



Uniting Church in Australia
SYNOD OF VICTORIA AND TASMANIA

MODERN SLAVERY STATEMENT

FY20



Uniting



ethical
investing with purpose



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I Foreword

This joint modern slavery statement is made by The Uniting Church in Australia Property Trust (Victoria) ('the UCAPT V') and The Uniting Church in Australia Property Trust (Tas.) ('the UCAPT T') on behalf of The Uniting Church in Australia Synod of Victoria and Tasmania, Uniting (Victoria and Tasmania) Limited, Uniting Housing (Victoria) Limited, Uniting Housing (Australia) Limited, Uniting Ethical Investors Limited and Uniting AgeWell Limited.

The Uniting Church in Australia is a values-based organisation with a long-standing history of being vocal and lobbying for positive change on a broad range of human rights and social justice issues. We are committed to implementing and enforcing effective systems and controls to ensure modern slavery does not take place within our operations or supply chains. We respect the human rights of our employees, volunteers, consumers, suppliers and business partners, and we commit to identifying and managing any risks to these rights.

We will comply with relevant local and national laws related to human rights and modern slavery with respect to our employees and our business operations. The services we provide and the way we work strive to be human-centred and rights-based, as recognised and articulated in international declarations, treaties and covenants that aim to ensure peace and equality among all peoples. We are committed to building relationships with suppliers, contractors and business partners who share our purpose, values and commitment to ethical and legal business practices.

In accordance with the Federal Government's *Modern Slavery Act 2018 (Cth)* ('the Act'), this statement outlines the steps taken during

FY2019/20 to assess and address modern slavery risks within the reporting entities. In the first year of this work our areas of focus have been:

- ▶ Understanding our supply chains
- ▶ Developing relationships with our suppliers
- ▶ Identifying and improving process weaknesses that may increase the risk of modern slavery.

In preparing this statement, the reporting entities established a central oversight committee with membership from each entity who met regularly over more than 12 months. The committee agreed a general approach for identifying and assessing risks and took a collaborative approach wherever central services were used or where common suppliers were identified to increase leverage.

This statement has been prepared and published in accordance with the Act.

This statement for The Uniting Church in Australia Synod of Victoria and Tasmania Group was approved by all the Members of the UCAPT V and UCAPT T as the parent entities on 4 November 2020.

Bob Hodges
Chairperson

The Uniting Church in Australia Property Trust (Victoria), and The Uniting Church in Australia Property Trust (Tas.)

4 November 2020



1. About the Uniting Church in Australia

Since the amalgamation of the Presbyterian, Methodist and Congregational churches in 1977¹, The Uniting Church has become the third largest Christian denomination in Australia, helping Australians in the search for meaning, purpose and community in life.

The Uniting Church is governed by four non-hierarchical, inter-related councils, each one with different responsibilities:

- ▶ The Uniting Church in Australia Assembly (the national council);
- ▶ Synod (the regional council);
- ▶ Presbyteries (the district council); and
- ▶ Congregations (the local council).²

The Synod of Victoria and Tasmania ('the Synod') is one of six Synods across the Uniting Church in Australia.

The Synod pursuant to Clause 15 (d) of the Basis of Union³ has responsibility for the general oversight, direction and administration of our worship, witness and service. A Synod Standing Committee acts on behalf of the Synod in respect of its responsibilities.

Through our historic and ongoing community work, we and our predecessors established and maintained several agencies to act as an extension of the Church including:

- ▶ Uniting (Victoria and Tasmania) Limited;
- ▶ Uniting AgeWell Limited;
- ▶ Uniting Ethical Investors Limited;
- ▶ Uniting Housing (Victoria) Limited; and
- ▶ Uniting Housing (Australia) Limited.

Each of these agencies implements the Synod's strategic directions in the fields of social welfare, public welfare, community services, aged care, investment management, and public housing. They act for the Synod, its presbyteries, congregations and institutions while reporting to the Synod Standing Committee.

1 The uniting of the Presbyterian, Methodist and Congregational Churches in 1977 is in accordance with each of the provisions of each State and Territory Acts of 1976 and 1977.

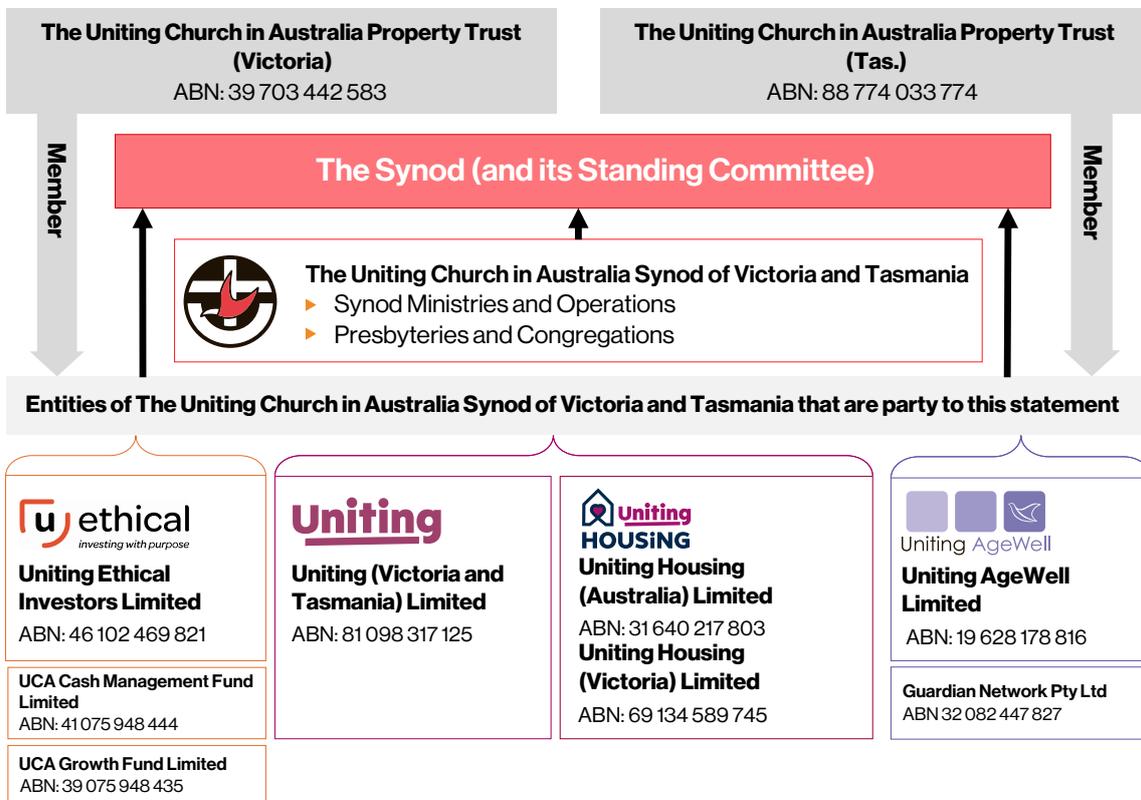
2 Referred to in Clause 15 of the Basis of Union which is a Schedule to each *The Uniting Church in Australia Act 1977* (Vic) and the *Uniting Church in Australia Act 1977* (Tas).

3 Which is Schedule One to each of the State and Territory Uniting Church Acts of 1976 and 1977.



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At union, property trusts were established in each state and territory [for the purposes of this statement, the relevant trusts are UCAPTV and UCAPTT to hold “trust property” in trust for The Church and “upon any other trust affecting the property”⁴. The UCAPTV and UCAPTT are constituted as corporations⁵, and are charities registered with the Australian Charities and Not-for-profits Commission. They control our related entities as members of those institutions. This statement covers our activities and legal entities controlled by the UCAPTV and UCAPTT, which are also members of each entity and is the reporting entity of this statement. Each entity reports to the Synod Standing Committee, the governing body. Our operating entities and their relationship are as below:



Uniting Housing (Australia) Limited and Uniting Housing (Victoria) Limited outsource a range of operational and administrative services to Uniting (Victoria and Tasmania) Limited (Uniting). The outsource arrangement includes end-to-end procurement of all goods and services. For that reason, the Modern Slavery Statement is being made by Uniting on behalf of all three entities.

4 The powers and duties of the UCAPTV are set out in Section 13 of *The Uniting Church in Australia Act 1977* (Vic); and powers and duties of the UCAPTT are set out in Section 11 of the *Uniting Church in Australia Act 1977* (Tas).

5 By Section 12(1) of *The Uniting Church in Australia Act 1977* (Vic); and Section 10(1) of the *Uniting Church in Australia Act 1977* (Tas).



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1.1 Approach

Our entities approached their respective modern slavery risk assessments by assessing their operations and supply chains according to key risk indicators across the following aspects of the supply chain:

- (a) products or service type, and nature of production
- (b) sector and industry, and types of employment arrangements generally applied
- (c) geographic distribution of supply chain
- (d) entity and structure of suppliers.

The specifics of each entity's approach varied due to differences in the nature of their operations and the sector they operate within. Further details are provided within individual entity sections of this statement. Where entities identified common supply chains with potential modern slavery risks, a joint approach to further assessment and supplier engagement was taken to reduce duplication and increase market leverage.





I 2. Justice and International Mission

2.1 About the Justice and International Mission Cluster

The Synod's Justice and International Mission Cluster ('JIM Cluster') advocated for supply chain transparency legislation from 2011. The JIM Cluster is a section of staff within the Synod dedicated to resourcing church members to take action on issues of social justice, human rights, environmental protection and global development.

We were represented on the Supply Chain Working Group of the Attorney-General's National Roundtable on Slavery and Human Trafficking that recommended the legislation to the Minister. We participated in the parliamentary and departmental inquiries in the process of developing and passing the Act into law. We were represented on the advisory body that drafted the guidance to reporting entities on implementation of the Act.

We continue to be represented in the Australian Government's National Roundtable on Slavery and Human Trafficking.

We have been part of global campaigns to address modern slavery in specific industries and locations. These have included:

- ▶ the cocoa industry in West Africa
- ▶ cotton production in Uzbekistan
- ▶ the seafood industry in Thailand
- ▶ rubber glove production in Malaysia
- ▶ the tinned fruit and vegetable industry in Thailand
- ▶ the garment industries in India and Cambodia.

We have also campaigned to the Commonwealth Government for reforms to address modern slavery-like situations on Australian farms, that usually involve people on temporary visas.

We have experience in organising on-the-ground investigations into businesses, working in collaboration with local non-government organisations and trade unions with the appropriate expertise.

Given the experience and capabilities of the JIM Cluster, and the overlap of some suppliers between entities, the JIM Cluster coordinated investigations into the entities suppliers on their behalf. The following section outlines specific interactions the JIM Cluster had with suppliers that represented a high risk of modern slavery in one or more of the entities supply chains. Each of the suppliers investigated relate to at least one of the reporting entities covered by this statement, with many of the suppliers being used by more than one. A materiality threshold of \$25,000 of purchase in the previous 12 months was applied in deciding which suppliers to engage with, with the exception of Google and Facebook.



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We took the view that for any supplier where our purchase was below \$25,000, we were unlikely to be able to influence the behaviour of the supplier in dealing with modern slavery risks.

2.2 Investigation into Facebook and Google's destruction of evidence

We were concerned about reports that Facebook and Google may have been destroying evidence relevant to human trafficking cases. The 2018 documentary *The Cleaners* exposed the use of people in the Philippines as content managers to screen social media and remove abusive material, including child sexual abuse material. They reported destroying the online evidence of child sexual abuse without referring it to the police. While our reporting entities make limited payments to Facebook, we directly use Facebook and Google products in our work. We wrote to Google in Australia and Facebook in Singapore.

Facebook provided written assurance that evidence of online child sexual abuse material was preserved and notification provided to law enforcement. However, they were unwilling to share the names of the contracted content manager companies around the world.

Google in California said it made use of software to detect child sexual abuse material on its platforms. If it is made aware of child sexual abuse material, it removes it from its service. It also reported it to the US National Centre for Missing and Exploited Children.⁶ Google's response did not clarify if it contracted content management to companies located in places such as the Philippines.

2.3 Modern slavery in our grocery stores

We wrote to Coles Supermarkets Australia Pty Limited (ACN: 004 189 708) ('Coles'), Woolworths Group Limited (ACN: 000 014 675) ('Woolworths') and ALDI Foods Pty Limited (ACN: 086 210 139) ('ALDI') on March 9 2020 seeking meetings to discuss their auditing processes to detect and respond to risks of modern slavery in their supply chain. Food products produced both in Australia and overseas are high risk of modern slavery within the supply chain. All three companies are direct material suppliers to the reporting entities. Coles agreed to meet, but the COVID-19 crisis delayed the meeting.

Woolworths met with us on 25 June 2020. Woolworths confirmed that its direct auditing process applied to its own brands. For other brands stocked in Woolworths stores, suppliers are required to adhere to Woolworths' *Responsible Sourcing Policy* and Standards as part of their Vendor Trading Terms. Woolworths also pointed out it had made some of its suppliers' names and addresses public on its website, which we had previously requested in meetings with Woolworths.

6 Correspondence from Security Counsel, Child Safety Team, Google, to the Uniting Church in Australia, 17 June 2019.



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Woolworths agreed to continue discussions about how we might work together to address modern slavery risks in supply chains and enhance existing detection activities.

Coles met with us on 3 July 2020. Coles outlined the improvements that they had made to their ethical sourcing practices since their previous engagement with us. These included direct engagement with a number of Australian unions and an increase in the number of staff in the ethical sourcing area to seven. Coles' focus at this time remained on its own brand products. Apparel suppliers are publicly disclosed on its website, while for other products Coles discloses the country of origin. It was agreed that we would explore opportunities to collaborate with Coles on addressing modern slavery risks relevant to our supply chains being purchased from Coles.

We met with ALDI on 3 July 2020. ALDI indicated that they seek to assess modern slavery risk for all the brands they stock. Within high-risk areas ALDI requests suppliers to maintain continuous coverage of third-party audits. Risk is also assessed from reports produced by Government and non-government organisations. ALDI has an ethical sourcing team in Australia as well as teams in a number of locations in Asia. ALDI is focusing on improving grievance mechanisms within the supply chain, which the Synod agreed would be an enhancement to what ALDI is currently doing. We look forward to continuing discussions with ALDI regarding modern slavery risks that are relevant to our supply chains of products purchased from ALDI stores.

We contacted Rayner's Fruit and Veg Wholesalers (ABN: 80 279 755 673) in Stawell on July 2 2020. They indicated they had no policies or practices to detect the risk of modern slavery in their purchasing of fruit and vegetables from Australian farms. They assisted us by disclosing their main supplier. We spoke to that supplier who indicated that they purchase from a large number of farms directly and from agents. They do not have any processes in place to detect the presence of modern slavery on any of the farms they are purchasing from.

2.4 Rubber glove production

In March and April 2020, we received reports of workers from Nepal, Myanmar, Indonesia and Bangladesh in rubber glove factories in Malaysia being subjected to illegal recruitment fees, long hours, low wages, passport confiscation and overcrowded accommodation.⁷

7 Pete Pattison, 'NHS urged to avoid PPE gloves made in 'slave-like' conditions in Malaysia', *The Guardian*, 23 April 2020.



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Workers were allegedly afforded a lack of protection from the risks of the COVID-19 outbreak.⁸ They were sleeping 20 to 40 in a dormitory, travelling with 45 workers on a factory-owned bus and required to use the same thumbprint scanner at the factories.⁹ It was alleged some of the migrant workers were required to pay between US\$1000 and US\$5000 to recruitment agents to secure jobs in the rubber glove factories.¹⁰ It was alleged that at some factories, workers were not permitted to leave their work stations to go to the toilet. They needed to urinate at their work station.¹¹ In March 2020, there were reports that auditors trying to check on labour conditions in the Malaysian-based rubber glove factories were being denied entry.¹² One media report alleged workers were forced to work 12-hour shifts, with many working for weeks with no rest day.¹³ The same report alleged workers faced coercion if they tried to take any days off because of sickness.¹⁴ There was a report that security guards were being used by one manufacturer to intimidate workers at their homes so they would attend work.¹⁵

We met with the Uniting AgeWell's supplier of rubber glove, CH2, by phone on 12 August 2020 after a considerable delay in being able to secure a meeting due to the COVID-19 pandemic. They offered reassurance they did not source from a particular factory run by Top Glove in Malaysia that had been subject to an import suspension by US authorities on suspicion of forced labour in the factory. We requested disclosure of any Malaysian factories that the rubber gloves we were purchasing may have come from and offered to collaborate to address any modern slavery risk.

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- 8 Caleb Quinley, 'I don't feel safe': Migrants making PPE gloves for hospitals allege labour abuse and exploitation', *The Independent*, 26 April 2020.
- 9 Pete Pattison, 'NHS urged to avoid PPE gloves made in 'slave-like' conditions in Malaysia', *The Guardian*, 23 April 2020; Andy Hall, 'Don't forget the people behind the PPE – migrant workers meeting the surge in demand for medical gloves', *The Telegraph*, 17 April 2020; and Jo Harper, 'Rubber glove shortage exposes migrant worker abuse in Malaysia', DW, 27 April 2020, www.dw.com/en/rubber-glove-shortage-exposes-migrant-worker-abuse-in-malaysia/a-53256054.
- 10 E-mail from Andy Hall, 31 March 2020.
- 11 Joe Lo, 'If you think NHS workers have it bad, just look at the people who equip them', *The Independent*, 16 April 2020.
- 12 E-mail from Andy Hall, 31 March 2020.
- 13 Jo Harper, 'Rubber glove shortage exposes migrant worker abuse in Malaysia', DW, 27 April 2020, www.dw.com/en/rubber-glove-shortage-exposes-migrant-worker-abuse-in-malaysia/a-53256054.
- 14 Jo Harper, 'Rubber glove shortage exposes migrant worker abuse in Malaysia', DW, 27 April 2020, www.dw.com/en/rubber-glove-shortage-exposes-migrant-worker-abuse-in-malaysia/a-53256054.
- 15 Caleb Quinley, 'I don't feel safe': Migrants making PPE gloves for hospitals allege labour abuse and exploitation', *The Independent*, 26 April 2020.



2.5 IT Hardware

We recognise that there may be a high risk of modern slavery in technology hardware. We conducted research to identify the specific risks in the supply chains of the reporting entities, with the findings so far available at:

▶ www.victas.uca.org.au/news-events/uca-statements/.

The initial two areas of risk we began investigating were in relation to reports of forced child labour in the production of cobalt in the Democratic Republic of Congo to be used in lithium-ion rechargeable batteries, and possible modern slavery in Chinese factories producing electronic hardware.

We contacted Electronics Watch to see if they could advise of any specific information they had about modern slavery risks in the products that we purchase. They invited us to become an affiliate of Electronics Watch.

Electronics Watch is an independent monitoring organisation, bringing together public sector buyers and civil society organisations in electronics production regions, with experts in human rights and global supply chains. They are a not-for-profit non-governmental organisation incorporated under Dutch law (No. 62721445 in the Dutch Chamber of Commerce Trade Register).

At the Commonwealth Government National Roundtable on Slavery and Human Trafficking we asked the Commonwealth Government to facilitate a working group on the modern slavery risk in technology hardware with reporting entities.

Given that technology hardware products are likely to be common to the vast majority of reporting entities, including the Commonwealth Government itself, it would make sense that reporting entities adopt a common position on addressing the risks of modern slavery in technology hardware. At the time of writing this report, we were waiting for a response from the Commonwealth Government.





I 3. Synod of Victoria and Tasmania

The Synod is one of six councils of the Uniting Church in Australia and it has oversight, direction and administration of the worship, witness and service of the Uniting Church in its region of responsibility, being Victoria and Tasmania. Within our Synod, there are eight Presbyteries which are regional councils of the Church and over 500 individual Congregations, each with their own church council. To support in our central role, a body referred to as 'Synod Ministries and Operations' ('SMO') has been established to resource the wider Church and provide various administrative and support services.

As a religious body, our operations are focused on the provision of worship and missional services amongst the wider community. In our role of resourcing the Church and providing the opportunity for further learning in theology, we have established the Pilgrim Theological College which provides accredited studies in theology, philosophy and ministry.

We also provide a range of missional services to the community across the life of the Church such as all-inclusive camp programs across Victoria, operation of opportunity shops, emergency relief, community support services, and social groups.

In delivering services to the community we operate a grant program to provide direct financial support for a wide range of initiatives across the life of the Church, including grants to Uniting. Other key areas of spend required to support our operations include property maintenance and development, information technology, insurance and utilities.

3.1 Assessment of modern slavery risk in our supply chain

As our first modern slavery risk assessment, and given the limited supplier and spend data available, our risk assessment for this reporting period focused on understanding our spend and supply chain through spend analysis and categorisation, desktop research of suppliers, and supplier engagement in key risk areas. As the vast majority of our tier one suppliers are local, and due to a lack of detailed supplier data, we did not undertake a geographic risk assessment of our suppliers. This work was completed in partnership with our JIM Cluster which coordinated a range of supplier investigations for all the reporting entities as detailed in Section 2.



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3.1.1 Synod Ministries and Operations

The below table provides an overview of some of the inherent risk spend categories identified.

Spend category	Comments
Food services	<p>While a low spend category overall, the food services category is considered high risk for modern slavery, due to the nature of labour used in some parts of the agriculture industry, and is a critical spend category for our camping programs.</p> <p>The JIM Cluster coordinated a central investigation as reported in section 2.3 of this statement.</p>
Information technology (IT) hardware	<p>We recognise that there may be a high risk of modern slavery in IT hardware. This continues to be an area of active investigation coordinated by our JIM Cluster as reported in section 2.5 of this statement.</p>
Property maintenance and development	<p>The majority of spend relates to the labour costs of contractors, with the key risk relating to the manufacturing supply chain of materials and parts which is many tiers down SMO's supply chain.</p> <p>SMO uses preferred contractors wherever possible. In procuring contractors for work, cost is not the only consideration and proposals are assessed on their achievability to prevent underquoting which may increase the risk of modern slavery in the supply chain.</p>
Cleaning services	<p>Given the inherent risk in cleaning services, which was heightened by COVID-19, SMO undertook a review of its cleaning contractor and was satisfied that appropriate pay and entitlements, as well as OHS arrangements, were in place for all staff and that inappropriate sub-contracting was not occurring. In response to COVID-19, SMO engaged in negotiations to formally adjust the scope of services with appropriate increase to cost.</p> <p>Our cleaning services provider is currently seeking certification through the Cleaning Accountability Framework.</p>



3.1.2 Congregations

A risk assessment of congregation spend using financial reporting available from our congregations identified the following spend categories which may include modern slavery risks in the supply chain.

Spend category	Comments
Property maintenance and development	<p>The majority of spend relates to the labour costs of local contractors, with the key risk relating to the manufacturing supply chain of materials and parts which is many tiers down the supply chain.</p> <p>Given the localised and minimal nature of congregation spend, we have little to no ability to affect change to the supply chain. However, the Synod's Property Services Team have oversight of all property projects >\$50K or where a building permit is required, and directly coordinate those over \$1M.</p>
Food services	<p>Many of our congregations procure foods from local grocery stores to share at various community gatherings. While a low spend category, we recognise the inherent risk in this sector.</p> <p>The JIM Cluster coordinated a central investigation of major grocery suppliers as reported in section 2.3 of this statement.</p>

3.2 Processes and controls to mitigate modern slavery risks

SMO provides oversight on the terms for employment to ensure appropriate conditions for those people employed across the Church. A central payroll service is used to ensure pay and entitlements are accurately and consistently applied.

SMO uses a decentralised procurement approach with minimal oversight and reporting for routine procurement activities. Controls to ensure that modern slavery is a key consideration throughout the procurement process had not previously been implemented. However, we use available spend reporting to identify and assess modern slavery risks in our supply chain. Our analysis is based on the US Department of Labour List combined with our knowledge of sector risks from the JIM Cluster. Where potential risks are identified we work in consultation with our JIM Cluster to investigate through engagement with our supply chain to better understand the risk, and if real, to lobby for change through our suppliers. Where we are unsatisfied with the response, we would then consider seeking an alternate supplier(s).



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Under the inter-conciliar operating model, the Synod does not direct the activities of Presbyteries and Congregations, including how they undertake procurement, nor is there detailed reporting in relation to procurement. That means we do not know centrally what products and services have been purchased from specific suppliers. As such, the Synod has limited oversight or ability to review and analyse procurement activities, other than from general financial reporting provided.

3.3 Steps taken for remediation and improvement

Steps taken to date

We have taken the first steps to gaining transparency over our spend and understanding our supply chain which was a key area of focus for this reporting period.

Through the Synod's JIM Cluster, we have engaged with material suppliers from those spend categories identified to have higher risks of modern slavery to gain a better understanding of the supply chains and address potential risks therein. This engagement is outlined in section 2 of this statement.

Work has now commenced to update our procurement policy and processes with consideration of modern slavery to be embedded in the end-to-end process. This is expected to be finalised in the first half of our FY21 and will include providing training to key staff on these processes. Compliance audits will be used to indicate the effectiveness of this training.

Our Future Plans

In our continuous commitment to identify and combat modern slavery risks, we aim to:

- ▶ finalise and embed our updated procurement policy and processes;
- ▶ provide modern slavery risk awareness training to our key staff involved in procurement activities;
- ▶ continue to investigate high risk categories of spend;
- ▶ implement use of supplier surveys for all suppliers that we have material spend with to gain greater insight into those supply chains; and
- ▶ continuously engage with suppliers to identify and mitigate modern slavery risks.





I 4. Uniting Vic. Tas.

4.1. Introduction

Uniting (Victoria and Tasmania) Limited ('Uniting') is one of the largest community service providers across Victoria and Tasmania, with over 3700 employees and 2400 volunteers. Uniting is the community services organisation of the Church and was formed via the transfer of operations, assets and liabilities from 21 UnitingCare agencies on 1 July 2017. Uniting delivers a broad range of programs and services in the areas of crisis and homelessness, alcohol and other drugs, child, youth and families, mental health, disability, early learning, employment and aged & carer.

Uniting Housing (Australia) Limited and Uniting Housing (Victoria) Limited outsource a range of operational and administrative services to Uniting. The outsource arrangement includes end-to-end procurement of all goods and services. For that reason, this Modern Slavery Statement is being made by Uniting on behalf of all three entities.

As well as providing services directly, Uniting also partners with other community service providers to deliver services. An example is the Disability and Carer Support Program in which Uniting participates as part of the Victorian Carer Gateway Consortium.

Uniting's major areas of procurement are in infrastructure-related products and services (property and ICT) and frontline labour to support the broad range of programs and services.

With the exception of Property, ICT and other major projects, procurement at Uniting is largely decentralised. The Procurement function provides policy and governance for procurement across the organisation along with the processes and tools that are used to purchase and contract suppliers of goods and services. Functionally, individual business groups conduct their own procurement activities, and engage with the Procurement function where the materiality or complexity warrants assistance. Property and ICT administer procurement from their own centralised functions.

4.2 Assessment of modern slavery risk in our supply chain

Uniting primarily procures infrastructure (property and ICT) and frontline labour to support the range of programs and services that we provide to the community. ICT has the highest risk profile of these three key procurement streams due to the supply chains of materials and support services that extend into geographic regions known to present modern slavery risk. Property has a lower risk profile which is mainly centred around supply of furniture and fittings that could originate from geographic regions known to present modern slavery risk. Frontline labour has a relatively low risk profile based on a labour force that is grounded in Australia.



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Two methods of assessment have been undertaken to assess Uniting's supply chain for modern slavery risk.

1. Profiling of Uniting's supplier register to identify high risk suppliers and industry sectors that require investigation. This profiling exercise was conducted by Mark Zirnsak - Senior Social Justice Advocate at the Synod's JIM Cluster.

Suppliers were assessed for risk of modern slavery where the purchase from the supplier in 2019 was greater than \$25,000. Suppliers were identified as high risk by being known to source products on the US Department of Labour list for goods of higher risk of forced labour in their production (www.dol.gov/sites/dolgov/files/ILAB/ListofGoods.pdf) or where the JIM Cluster was aware of reports or research that had previously identified the presence of modern slavery in the production of a good or service.

2. ICT and Property each conducted a survey of their top 10 suppliers (by spend) to obtain information regarding their supply chains and modern slavery reporting.

The survey was created to understand if Uniting's key suppliers

- ▶ Are required to provide an annual Modern Slavery Statement in Australia, or report in any jurisdiction other than Australia
- ▶ Have assessed their supply chain for risks of modern slavery
- ▶ Have a subjective view of where modern slavery risk could exist in their supply chain
- ▶ Are aware of any organisation in their supply chain using a migrant workforce or requiring employees to pay a "Recruitment Fee" before they can start work.

4.2.1 Information Communication & Technology (ICT)

Uniting adopted a dual approach of direct engagement via survey and open source public record assessment and analysis to examine the modern slavery responses of major ICT suppliers of equipment and services. Eight of the ten organisations reviewed have a legal presence in Australia. All of those with a presence in Australia responded to the survey and three of them confirmed that they are required to report under Australian law.

In many cases critical ICT equipment is only available in Australia via intermediaries (resellers) and the manufacturer has little presence in Australia. As resellers are unable to respond on behalf of other parties due to legal liability, Uniting was able to draw upon reporting in other key jurisdictions such as the State of California (United States) Transparency in Supply Chains Act 2010 and the United Kingdom *Modern Slavery Act 2015*. California is the jurisdiction housing HQs for many major multinational ICT suppliers.



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The combined analysis confirmed that major global suppliers of ICT equipment and services demonstrated committed and practical undertakings to address risks of modern slavery, and that Australian domiciled entities intended to comply with required mandatory reporting and actions.

Uniting is committed to the ethical sourcing of ICT equipment and services and expects that suppliers and partners continuously show alignment to this core value.

4.2.2 Property – Asset Management

Uniting has inherited a large number of small-scale local area contractors as a result of the merger of the 23 founding agencies and as such still works with many of these small-scale contractors and sole operators with limited systems. Given this it was decided to review the larger contracts (by spend) which had been in place for capital works and services in the relevant period. Contractors were contacted directly and surveyed with subsequent follow up.

The greatest risk in this area is employers sourcing labourers and low skilled employees at below- award rates in order to reduce quotes and win the work. This is somewhat safeguarded by;

- ▶ these contracts being associated with trades that are often unionised and have a heightened understanding of occupational health and safety regulations and compliance and as such require appropriate employment practices in support of this
- ▶ Uniting facility management staff being experienced and cognisant of the inherent risk in the sector and the potential reputational risk to the organisation of inappropriate practices being revealed
- ▶ competitive quoting undertaken by staff familiar with the industry who review and check bids against estimated hours and industry pricing.

Following the bringing together of its facilities management activities, Uniting is currently undergoing a period of contract consolidation and is preparing contract scopes for various asset services and engaging in procurement with standard contract and procurement documents. These template documents incorporate specific references to modern slavery risk and management of such.

4.3 Processes and controls to mitigate modern slavery risks

Controls have been established in Uniting's procurement and contracting processes to ensure that modern slavery is a key consideration throughout the procurement process

Procurement Policy Uniting has updated its Procurement Policy to include Modern Slavery in the decision-making process. The policy directs purchasers to the Contracts & Procurement intranet page for a list of suppliers, categories and countries that present a risk of modern slavery occurring. Purchasers are then referred to the Contracts & Procurement team for investigation if a risk is indicated.



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Tender Documentation Uniting's tender documentation has been reviewed and now includes modern slavery questions requiring a response from vendors.

Procurement Hub Uniting participates in a collaborative procurement arrangement with seven other Uniting Church entities across Australia known as the UCA Procurement Hub. Accenture is currently contracted to provide services to the Hub including establishing supply arrangements for commonly procured goods and services. The Uniting Church entities have collaborated to ensure that Accenture is accountable for making modern slavery as part of supplier selection criteria when undertaking sourcing activities.

4.4 Steps taken for remediation and improvement

Steps taken to date

We have profiled our supplier register to identify high risk suppliers and industry sectors. We have additionally sought attestations and evidence from our top 20 suppliers across Property and ICT of their compliance with the Act. These measures are the first step to gaining transparency across our supply chain which was a key area of focus for this reporting period.

The Procurement Hub in which Uniting is a participant is assessing modern slavery risk as part of supplier selection criteria. This engagement is outlined in section 4.3 of this statement.

Uniting's procurement policy has been updated so that identifying the risk of modern slavery is embedded in our procurement processes.

Our Future Plans

We commit to continuously improve our processes to identify and combat modern slavery risks.

In doing so we will:

- ▶ Develop a Social Procurement Policy to include modern slavery as a key pillar to provide a methodology of assessment alongside value-for-money decision-making when purchasing
- ▶ Promote awareness and active assessment of modern slavery risks to all staff via our intranet who are involved in procurement activities
- ▶ Ensure contract templates include appropriate clauses relating to anti-slavery laws
- ▶ Continue to investigate high risk categories of spend
- ▶ Continuously engage with suppliers to identify and mitigate modern slavery risks.





I 5 U Ethical

5.1 Introduction

We are an ethical investment manager with approximately 25 employees, primarily office-based and located in Melbourne, Australia. Our core business is issuing and managing investment products. We also provide loans to commercial borrowers and community organisations.

Our investment process applies strict ethical screens. We seek to invest in companies that promote human welfare and dignity and environmental sustainability, with positive environmental, social and governance (ESG) ratings and with strong alignment to the United Nations sustainable development goals. We avoid industries that are detrimental to society or the environment.

We are also a social enterprise. The majority of our operating surplus forms a community contribution made via Synod.

We are governed by an independent board of directors. The board has established three committees to advise it on key governance areas: the investment committee, the audit, risk and compliance committee and the people and nominations committee. The board provides strategic guidance and effective oversight of the company and management.

We consider modern slavery an important, albeit complex, topic and seek to contribute to the elimination of these practices across the world. Our strategy to identify and manage modern slavery risks involves first determining the appropriate standards and then incorporating these into our ethical investment methodology, our ongoing engagement with the companies we invest in, as well as with our key suppliers and service providers.

5.2 Assessment of modern slavery risk in our supply chain

5.2.1 Investments risk assessment

Modern slavery risk assessment methodologies within the asset management industry vary in level of detail. U Ethical prides itself in being an industry leader in responsible investment, and our investment team uses a range of tools and resources to assess potential modern slavery risks within the companies in our portfolios.

They include evaluating controversies highlighted through MSCI ESG Research's screening tools, the ISS proxy voting platform adopting the SRI policy framework as well as modern slavery exposures identified by the JIM Cluster. Through a combination of quantitative screening coupled with active direct qualitative assessment of all companies considered for portfolio inclusion, we integrate environmental, social and governance (ESG) analysis into our process for creating long-term sustainable value for our investors.



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We currently invest in securities issued by approximately 100 companies across our cash, fixed income and equities products. Our portfolio holdings are published on our website at www.uethical.com. These companies are domiciled in Australia, the US, Europe, the UK and Japan, but have operations and complex supply chains across a wide range of developed and emerging markets.

We have examined all of our portfolios, which were exposed to nine of the eleven Global Industry Classification Standard (GICS) sectors. This identified key risks related to modern slavery within the consumer discretionary, consumer staples, healthcare, industrials, information technology and real estate sectors. Fixed income holdings also included exposure to government and not-for-profit organisations, such as the Commonwealth of Australia and the University of Sydney, as well as direct lending to a range of commercial and community borrowers, none of which flagged material risks.

Through a process of active engagement and peer collaboration, U Ethical encourages all portfolio companies with exposure to modern slavery risks to implement robust supply-chain management strategies. We believe that as community expectations increase for companies to exercise ethical supply chain standards, the focus on this important component of ESG policy will demand a more rigorous response from the investment industry and the corporate sector, as well as in consumer behaviour. Our active approach in heightening awareness is designed to increase corporate transparency and to contribute to growing corporate recognition of and action on modern slavery issues.

In addition to the direct overview and analysis of our portfolio exposures, U Ethical collaborates with other active practitioners of socially responsible investment to raise awareness of modern slavery considerations and to maximise the impact of efforts to alleviate its consequences.

5.2.2 Supply chain risk assessment

We applied a practical approach to assessing, prioritising and mitigating salient modern slavery risk where we have the most meaningful leverage in our business relationships. We identified and categorised 96 tier-one suppliers and service providers (“suppliers”) in the financial year to 30 June 2020. We analysed, to varying depths, the risk clusters based on industry sectors, operating jurisdictions, business model, products or services provided and spend. The risk indicators applied were:

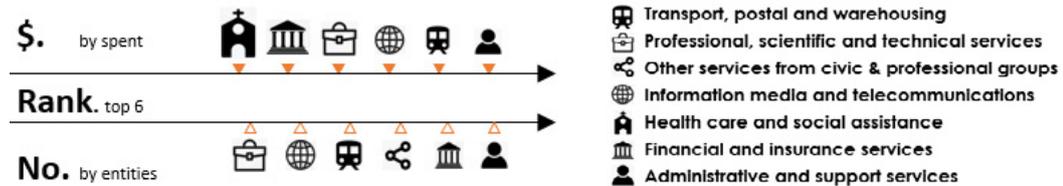
- ▶ identifying whether a supplier’s operations take place in repressive regimes;
- ▶ reviewing publicly available media/legal reports that indicated labour exploitation by our suppliers;
- ▶ engaging with our top eight suppliers by spend.



MODERN SLAVERY STATEMENT

General industry analysis*

The graphic below shows our total expenditure on external suppliers between 1 July 2019 and 15 June 2020 ranked by industry sector, spend and count:



Product and sector risks*

We also identified the sectors (or sub-sectors) with potential modern slavery risks given the nature of the services and products¹⁶ supplied. These amounted to 9.4% of our total supplier count and 0.5% of spend. In descending order of spend, they were: (i) accommodation and food services, (ii) manufacturing, (iii) food retailing, and (iv) construction. In particular, 72% of our spend comprised lump sum payments for the administrative and support services provided by Synod Ministries and Operations, including property services (building management, cleaning, office supplies and furniture) and IT services. We acknowledge the Synod’s own efforts in assessing and remediating modern slavery risks in its operations.

Geographic risks*

The majority of our tier-one suppliers only operate in low-risk countries.¹⁷ Of the top 33 suppliers by spend (transaction ≥\$10k), 94% operate domestically.



Individual risks



We conducted a media search of publicly available material on all 96 suppliers using global risk database Refinitiv and identified only one former supplier (low-spend) involved in a relevant legal case in the US in 2015.



We also sent out modern slavery risk questionnaires to our top suppliers by spend. Most have yet to submit a full response. We will conduct desktop reviews upon receipt, which is anticipated in the next quarter.

16 [List of Goods Produced by Child Labor or Forced Labor, US Bureau of International Labor Affairs, 20 September 2018](#)

17 High risk jurisdictions include conflict-affected zones, countries where there is weak rule of law, high levels of corruption, where the governments do not or are unable to fulfil their duty to protect human rights or Economic Processing Zone jurisdictions: page 15, “Modern Slavery Risks, Rights and Responsibilities: A Guide for Companies and Investors”, Australian Council of Superannuation Investors, February 2019

*All figures are approximations



5.3 Processes and controls to mitigate modern slavery risks

5.3.1 Investments and operations

With the aim of delivering sustainable long-term investment outcomes, our ethical investment framework integrates ESG factor analysis alongside quantitative and qualitative assessment across all asset classes. Through active stewardship, we encourage the companies we invest in to adopt best-practice ESG standards. Ethical and ESG screening takes place before any investment decision is made. The investment team discusses emerging ethical and ESG controversies as they arise, including any need to address a specific issue with a particular company.

Our ESG research incorporates a range of human rights factors and assesses company performance against these based on their materiality to the business. We expect the companies that we invest in to meet internationally recognised human rights standards and to accept responsibility for this throughout their supply chain. We noted that many of our existing ESG human rights controversies overlap with modern slavery controversies, for example: displacement or relocation of vulnerable groups; adverse impact on human rights to land, food and water; exploitation of migrant workers and children; and sovereign debt with a suppressive and undemocratic regime.

5.3.2 Operations and supply chain

U Ethical complies with Australian employment laws and we therefore identified minimal modern slavery risks in our internal operations.

Our third-party procurement and outsourcing comprises mainly:

- ▶ fund services, e.g. custody and fund administration
- ▶ professional services, e.g. legal, audit, tax, design and IT;
- ▶ other services, e.g. advertising, business travel, catering and accommodation; and
- ▶ administrative and support services provided by Synod Ministries and Operations.

The size and nature of our business as a regulated financial services company means we employ targeted strategies and formal controls to outsourcing of material business activities, which includes, but are not limited to:

Pre-appointment – supply chain due diligence check, risk assessment and legal contracts review, including modern slavery risks considerations; and

On an annual basis – monitoring performance and compliance system of key service providers.



5.4 Steps taken for remediation and improvement

As part of our continuous commitment to be ethically-driven and socially responsible, a number of steps were taken to improve our processes to identify, mitigate and manage any modern slavery risks across both our investments and supply chain.

We anticipate that, as attention on this topic grows and transparency improves, we will continue to strengthen our assessment of business practices and engage with companies where we believe more resolute action is required.

Steps taken to date	
Investments	Supply Chains
<p>Our ethical investment policy specifically mandates the review of companies for unacceptable business activities including potential modern slavery controversies.</p> <p>We integrate the evaluation of environmental, social and governance (ESG) factors into our investment process to assist us in managing this risk. The investment team uses a wide range of external resources, such as MSCI ESG Research, sell-side research, company reports, management meetings and industry body publications. A core element of our ethical / ESG review is to examine labour management and supply chain issues.</p> <p>We are a member of the Responsible Investment Association of Australasia (RIAA), a signatory to the UN Principles for Responsible Investment (UNPRI) and also a certified B Corp.</p> <p>We have an independent board that has delegated responsibility to the investment committee to oversee the investment team's activities and the effective implementation of the ethical investment policy. We also have an ethical advisory panel including independent experts which is consulted on key ethical issues.</p>	<p>We have taken the first step towards mapping our supply chain to identify general modern slavery risks. We have also engaged with or conducted research on our suppliers to identify our specific modern slavery risks.</p> <p>We have updated the outsourcing and procurement policy to embed modern slavery risk management throughout the process, enabling a risk-conscious view and transparency in our supply chain, including:</p> <ul style="list-style-type: none"> ▶ adopting the 'probity' principles; ▶ ensuring we continue to apply our code of ethics and conduct in our business practices; ▶ setting due diligence criteria and steps, pre and post appointment, to identify, monitor and mitigate modern slavery risks; and ▶ adding long-term or material outsourcing and procurement activities into our annual compliance monitoring program. <p>We have started the implementation steps internally and externally, including reviewing new proposals against the updated risk procedure and engaging our top suppliers.</p>

18 List of Goods Produced by Child Labor or Forced Labor, US Bureau of International Labor Affairs, 20 September 2018.



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Our Future Plans	
Investments	Supply Chains
<p>As the reporting from companies improves over time, we expect to gain further insight into the ways we can improve our processes. Where we become aware of companies with severe modern slavery issues, we will exclude them from our portfolios.</p> <p>Where we become aware of companies with moderate modern slavery issues, we will engage with them and aim to ensure that subsequently there is adequate remediation and process improvement to address these issues. This will include firm communication to company management noting our concerns and expected actions.</p> <p>Where appropriate, we shall seek to meet with company management, in-person or via technology, to discuss our views.</p> <p>Our investment team will monitor these activities over the following six months and will continue to engage with the company if progress has been made but not to a satisfactory level.</p> <p>If the response continues to be unacceptable, we will then either:</p> <ul style="list-style-type: none"> ▶ seek further engagement with the company through collaborative efforts with industry peers and working groups, such as RIAA and UNPRI, to lobby for additional change (this approach has proven successful in the past and may incorporate public campaigns, forcing shareholder resolutions or continued lobbying); or ▶ as existing shareholders, query senior management through shareholder briefings; or ▶ exit the share register and place the company on the excluded companies list. 	<p>With regard to our degree of causation or linkage to our potential modern slavery risks, we acknowledge the need:</p> <ul style="list-style-type: none"> ▶ to collaborate with and collect information from our main suppliers enabling us to evaluate our tier one supply chain more effectively; and ▶ for ongoing risk assessments of products and services provided by our tier-two suppliers. <p>As part of our continuous commitment to identify and combat modern slavery risks, we aim to:</p> <ul style="list-style-type: none"> ▶ design and conduct targeted reviews of our suppliers and service providers operating within the financial services industry, considering ILAB reports or other relevant data sources; ▶ provide modern slavery risk awareness training to our team; ▶ apply the outsourcing and procurement policy and processes and monitor the outcomes; ▶ continuously engage with suppliers to identify and mitigate such risks; and ▶ improve existing supplier agreements through the inclusion of modern slavery prevention obligations. <p>We will continue to evolve our approach and criteria in assessing our suppliers and service providers' risks, especially for modern slavery. This includes:</p> <ul style="list-style-type: none"> ▶ conducting monitoring on an annual basis; ▶ developing risk indicators to measure our effectiveness in preventing modern slavery in our business and supply chain; ▶ identifying improvement opportunities within our supplier and service provider framework.





I 6. Uniting AgeWell

6.1 Introduction

As an organisation of the Uniting Church in Australia, Uniting AgeWell Limited ('Uniting AgeWell') has a long history of providing residential and community services to older Australians across Victoria and Tasmania. Uniting AgeWell service options include:

- ▶ Residential Care
- ▶ Independent and Assisted Living
- ▶ Home Care
- ▶ Social Support
- ▶ Allied Health and Therapy programs
- ▶ Respite and Carer Support

Uniting AgeWell also wholly owns a subsidiary company, Guardian Network Pty Ltd that provides in home support services. This Statement is a consolidated statement that covers both Uniting AgeWell and Guardian Network Pty Ltd. The organisational focus is on creating both a good life and quality outcomes for older people. This informs not only the work done every day, but is at the heart of our organisational decision-making. Uniting AgeWell's reason for being is to create caring communities where every older person feels welcome and supported in ways that matter to them.

Our 2,600 plus staff and 600 volunteers are dedicated to providing the highest quality care and support to clients to enable them to live well with choice and peace of mind; and to live satisfying and fulfilled lives, where they can be active and connected members of their community.

Uniting AgeWell employs people in 152 different roles – from hotel services and administration to nurses, chaplains and care workers – with 72 per cent of staff directly supporting clients in care roles. Uniting AgeWell celebrates diversity and has inclusive work practices and policies to ensure our staff and clients always feel welcome, valued and respected.

Uniting AgeWell is governed by a Board of Directors. Working with the Chief Executive Officer and Senior Executive Team, the directors help shape the direction of the organisation through governance and stewardship, and provide the highest standards of ethical conduct and practice. Board directors sit on various sub-committees that advise on key governance areas. These include: Audit and Risk; Finance; Mission; Property and Development; Clinical Governance; Governance; and AgeWell Community Advisory Committee.

Find out more about what we do at: unitingagewell.org



6.2 Assessment of modern slavery risk in our supply chain

Measuring and managing our supply chain risks

Uniting AgeWell is committed to measuring, managing and eliminating any human rights violations in our supply chain through:

- ▶ **Supplier Sustainability Principles** – to be established to reflect our strong commitment to conducting our supply chain management in a responsible and sustainable manner, setting minimum expectations for supplier compliance with human rights laws as they pertain to employees and business operations. As part of our broader approach to sustainability, we seek to engage and encourage suppliers and partners who share this understanding and commitment.
- ▶ **Risk management and due diligence** – In 2020-21 Uniting AgeWell plans to enhance risk management processes to include risk-based supplier segmentation to identify suppliers that may pose greater human rights/modern slavery risks. Existing supplier agreement templates have been updated to refer specifically to the Act and new suppliers already contract on these terms.

6.3 Processes and controls to mitigate modern slavery risks

Our position on modern slavery

Defined as exploitative practices that violate an individual's dignity and human rights, including human trafficking, servitude, forced labour, debt bondage, and wage theft, all forms of modern slavery are serious crimes under Australian law. Uniting AgeWell rejects any form of modern slavery, and we are committed to implementing and enforcing effective systems and controls to ensure it does not take place within our own business or our supply chains. Wherever we operate, we respect the human rights of our employees, clients, suppliers and business partners, and we aim to identify and manage any risks related to these rights.

Our workplace

We are committed to complying with relevant local and national laws related to human rights and modern slavery with respect to our employees and our business operations. As part of Uniting AgeWell's commitment to treating people with respect and dignity as individuals, we do not tolerate any form of discrimination or harassment, and we strive to be an equal opportunity employer in all locations. We are committed to ensuring our employment conditions align with minimum wages, hours of work, appropriate leave provisions and the ability to sustain the health, safety and wellbeing of our employees, contractors, clients and visitors. We are also committed to creating and maintaining both a diverse workforce and an inclusive and safe workplace for all.



6.4 Steps taken for remediation and improvement

Measuring and managing our workplace risks

As an agency of the Synod of Victoria and Tasmania, Uniting AgeWell has initiated the process of monitoring and reviewing our own quality and risk frameworks, policies, systems and processes. We are dedicating resources to measure, manage and eliminate any human rights violations in our workplaces through:

- ▶ **Policies and governance** – our Board leads our directorates to implement strong corporate governance ensuring all decisions and actions are based on transparency, integrity, responsibility and performance for long-term sustainability.
- ▶ **Ethics and conduct** – we recognise that our employees, contractors, directors and agents must maintain a compliant and ethical approach to business practices, and we are committed to dealing honestly and fairly with our clients, and to manage the risk of unfair client outcomes wherever we operate.
- ▶ **Employee training and awareness** – informing our teams of their obligations to uphold laws, regulations, codes or standards as applicable. In addition to existing training modules, we will create new modules to address the identification and management of human rights issues.

Steps taken to date

We have profiled our supplier register to identify high risk suppliers and industry sectors. We have sought attestations and evidence from our top 10 suppliers. These measures are the first step to gaining transparency across our supply chain which was a key area of focus for this reporting period.

The Procurement Hub in which Uniting AgeWell is a participant is assessing modern slavery risk as part of supplier selection criteria.

Uniting AgeWell's procurement policy has been updated so that identifying the risk of modern slavery is embedded in our procurement processes.

Our Future Plans

We commit to continuously improve our processes to identify and combat modern slavery risks. In doing so we plan to:

- ▶ Develop Supplier Sustainability principles to incorporate into a Social Procurement Policy which includes modern slavery as a key pillar assessment alongside value-for-money decision-making when purchasing.
- ▶ Promote awareness and active assessment of modern slavery risks to all staff who are involved in procurement activities.
- ▶ Ensure supplier contracts include appropriate clauses relating to anti-slavery laws.
- ▶ Continue to investigate high risk categories of spend.
- ▶ Continuously engage with suppliers to identify and mitigate modern slavery risks.
- ▶ Develop key performance indicators to measure effectiveness in preventing modern slavery in any part of our business or supply chains.
- ▶ Update relevant Uniting AgeWell policies to specifically reference modern slavery.