

MODERN SLAVERY STATEMENT

1 July 2021 – 30 June 2022

This statement is published by the Australian Nuclear Science and Technology Organisation (ABN 47 956 969 590) (ANSTO) in accordance with the Modern Slavery Act 2018 (Cth). Three core values underpin the ANSTO organisation: safe, secure and sustainable. At ANSTO, we understand that ethical conduct and protecting human rights is critical to upholding these values. We are committed to contributing to the eradication of modern slavery through compliant, responsible and ethical business practices. This statement outlines how we assess and address modern slavery risks in our business and supply chain, and our plans for continuous improvement in the future

About Us

ANSTO is an Australian Government Corporate Commonwealth entity established under the Australian Nuclear Science and Technology Organisation Act 1987 (Cth). ANSTO is one of the largest public research organisations in Australia, conducting research in nuclear science and technology across a number of fields including health. We provide expert advice to the Australian Government in relation to nuclear-related matters, coordinate with international nuclear organisations and partner with research bodies and universities. We facilitate training and education, including through scientific research fellowships, and make available our state-of-the-art facilities, equipment and expertise to further research and development. ANSTO operates landmark Australian infrastructure for its research including the Open Pool Australian Lightwater (OPAL) multi-purpose reactor, the Centre for Accelerator Science, Australian Centre for Neutron Scattering, the National Deuteration Facility and the Australian Synchrotron. ANSTO's main campus and registered office is New Illawarra Road, Lucas Heights NSW. There are two other key facilities located in Clayton Victoria and Camperdown NSW. We employ approximately 1,370 people across Australia and regularly host scientists and students to further their research. ANSTO performs the procurement function on behalf of its subsidiaries.

Our Supply Chain

The supply chain for ANSTO remains consistent at over 4,000 suppliers and procures a diverse range of goods and services, predominantly scientific and engineering plant and equipment, nuclear materials, IT hardware and software, security and laboratory consumables. ANSTO supports and engages in research partnerships and knowledge sharing activities with a number of international partners through both formal institutional partnerships and approved collaborations. ANSTO participates in whole-of-government procurement through shared Commonwealth contracts, as well as engaging in direct procurement from suppliers. ANSTO records procurement activities on Austender as required by the applicable Commonwealth Procurement Rules, and it also discloses contracts entered into in accordance with the requirements of a Commonwealth entity.

Risks of Modern Slavery in ANSTO's supply chain

Consistent with the risk-based approach of the Commonwealth Government and the UN Guiding Principles on Business and Human Rights, ANSTO's approach to assessing the risk of modern slavery is primarily through its supply chain. In assessing the risk ANSTO relies on Commonwealth and other relevant guidance to target products and services, sectors and locations in which modern slavery has been found to take place, including high risk communities, countries and industries.

ANSTO has reviewed the spend profile and consistent with previous years has identified the following products as being the highest risk:

- Garments (uniforms, gloves, and other protective equipment)
- Electronics
- Chemical suppliers (Elements and Mining)

To minimise the risk, ANSTO:

- Does not procure the above products directly from producers linked to geographical locations identified to be at a higher risk of modern slavery.
- Procures its electronics from a whole-of-government contract, leveraging the benefit of the Commonwealth's due diligence process.
- Procures garments through an Australian distributor which has provided ANSTO with a statement confirming that it has zero tolerance to all forms of Modern Slavery and is constantly evaluating the compliance of its supply chain.
- Procures its chemicals from local distributors who have conducted continuous due diligence on the supply chain via active surveillance audits and have provided supporting Modern Slavery Statements.

ANSTO has developed a process to screen suppliers to identify whether any high-risk products may be sourced indirectly from high-risk communities or geographic locations and to verify the steps taken to ensure compliance with the Modern Slavery Act. The spend profile has not changed from previous years and there have been no claims or reported instances of modern slavery in our supply chain.

Addressing the Risks of Modern Slavery

Consistent with ANSTO's values, our policies and processes have a strong focus on ethics. We have in place a Code of Conduct, which sets clear expectations of all personnel in respect to ethical and legal compliance.

Our procurement strategy, guidelines and policy both align with the Code of Conduct, with an emphasis on transparency, ethics and risk management. ANSTO's procurement function has well-defined processes and procedures to ensure that all procurement activity complies with the Commonwealth Procurement Rules, including that the lowest price is not the sole determinant in achieving value for money.

ANSTO requires its suppliers to adhere to the same high ethical standards. Our standard procurement contract templates include a requirement for suppliers to comply with the obligations under the Modern Slavery Laws (defined in the contract as the Modern Slavery Act 2018 (NSW) and the Modern Slavery Act 2018 (Cth), including to:

- Identify, assess and address risks of modern slavery practices in the operations and supply chains of the provision of the goods and services.
- Provide information reasonably required by ANSTO and comply with reasonable directions for the purposes of enabling ANSTO to comply with its modern slavery obligations.
- Ensure personnel responsible for managing the operations and supply chains under the contract are trained to identify and report Modern Slavery.
- Prepare and implement a modern slavery risk management plan in relation to the performance of the contract which at the minimum addresses:
 - The supplier's steps to identify and assess risks of modern slavery practices in the operations and supply chains used in the performance of the contract.
 - The Supplier's processes for addressing any modern slavery practices of which it becomes aware in the operations and supply chains used in the performance of the contract.
 - the content and timing of training for personnel about modern slavery.
 - the grievance mechanism/s available to personnel to handle complaints or grievances about modern slavery practices.
- Comply with its modern slavery risk management plan.

- If it becomes aware of modern slavery practices to take all reasonable action to address or remove practices and remediate any adverse impacts caused or contributed to by the supplier.

In terms of continuous improvement and monitoring, ANSTO encourages its staff to report any instances of illegal or unethical conduct. All personnel have access to Fair Call, an independently monitored reporting service.

As part of continuous improvement and business as usual practices ANSTO has:

- Maintained the Approach to Market template to require compliance with modern slavery laws.
- Maintained the vendor creation template forms to include checklists to screen vendors as part of the supplier enablement process to provide modern slavery statements.
- Enhanced the functionality of the Procurement technology database to record & store Modern Slavery Statements under the vendor records.
- Conducted regular awareness training with all ANSTO staff involved in the Sourcing & Procurement activities on the requirements of Modern Slavery activities and the risk associated in dealing with high-risk categories, communities and countries.

The impact of the COVID 19 pandemic has changed the risk profile for modern slavery and ANSTO is aware of the need to increase vigilance with respect to modern slavery and supply chain dynamics around PPE goods, for example. As an organisation, ANSTO is also aware of the wider impact of pandemic responses on global and local supply chain integrity, short term employment contracts, the equitable support of parents during lockdown events and the effective support and management of work from home arrangements. ANSTO maintains policies and procedures to address and mitigate these risks and shares good practice when appropriate to do so.

Assessing the effectiveness of the actions being taken to address modern slavery risk

To monitor the effectiveness of the actions taken to address modern slavery risks, ANSTO has undertaken the following measures:

- Continued to engage suppliers of high-volume items, including the garment distributor, to review their policies and processes with respect to modern slavery compliance.
- Targeted suppliers of some higher risk items i.e., chemicals, general stationery, and electronic instruments to present results of “active surveillance” audits of the respective supply chains confirming compliance.
- Continued the formal “performance review”, which is based on risk and contract value and is conducted on a regular basis. This includes a review of the Modern Slavery Statements for suppliers of high-risk categories. The reviews are documented and stored in the Procurement database.
- Tracked and monitored staff training with respect to modern slavery.

Our next steps

ANSTO took a multi-faceted approach which established a strong baseline from which to build and measure its ongoing treatment and reporting of modern slavery risk. ANSTO will continue to embed the strategies outlined in this Statement, with an additional focus on the following areas over the next 12-month reporting period.

- Maintain the level of training including new staff on the awareness and application of modern slavery risk treatment by ANSTO staff in their procurement and contract management activities;

- Further segment suppliers into different risk categories based on the type or manufacturing location of what they supply to the ANSTO;
- Expand the risk-based vendor checks on what measures/audits are conducted under an active surveillance of compliance to their policies and Modern Slavery risk management plan; and
- Continue to actively monitor the second tier of current ANSTO suppliers in high-risk categories;
- Continue to maintain our policies and contract templates to reflect our position with respect to modern slavery; and

Approval

The Board is the principal governing body of ANSTO and approves this statement.

Signed in accordance with a resolution of the Board for and on behalf of the ANSTO by its responsible member:



The Hon Dr Annabelle Bennett, AC SC FAA FAL
Board Chair

22 December 2022