



Modern Slavery Statement

for the financial Year 1 January to 31 December 2025



Save the Children

Save the Children Australia's Modern Slavery Statement (2025)

Introduction

This Modern Slavery Statement (**Statement**) for Save the Children Australia (ACN 008 610 035) (**SCAus**) is submitted pursuant to s 5(1)(a) and s13 of the *Modern Slavery Act 2018* (Cth) (**Act**). This Statement covers the reporting period from 1 January 2025 to 31 December 2025.

SCAus is an independent child rights organisation. Modern slavery, including trafficking, forced marriage, servitude, forced labour, as well as forced recruitment for armed conflict, prostitution, pornography and other illicit activities represent some of the worst child rights violations. SCAus works with children and families in Australia and around the world who have experienced or are at risk of these forms of slavery. SCAus aims to help address the root causes of modern slavery, as well as to support rehabilitation of those affected and protect them from further harm.

1. Reporting Entities

s16(1)(a) of the Modern Slavery Act 2018 (Cth)

This statement is made on behalf of SCAus and entities of which SCAus is the sole member, Save the Children Impact Fund Limited (ACN 634 440 145), Library For All Limited (ACN 602 320 865) and the Centre for Evidence and Implementation Limited (ACN 625 430 177).

2. About Us – Our Structure, Operations and Supply Chains

s16(1)(b) of the Modern Slavery Act 2018 (Cth)

About SCAUs

SCAus focuses on championing child rights and providing a voice for young people. Its work spans health, education, emergency response, and child protection, addressing issues from climate change to violence against children. With a history of advocacy since 1919, the mission of SCAus extends to ensuring every child's right to survival, protection, development, and participation. Supported by volunteers, members, employees, and partners, SCAus aims for a world where every child has a healthy start, education, and a safe life free from violence.

SCAus Structure

SCAus is a public company limited by guarantee, registered with the Australian Charities and Not-for-profits Commission. SCAus is endorsed by the Australian Taxation Office as a Public Benevolent Institution.

The board of SCAus is responsible for overall governance of the organisation. Sub-board committees assist the board in fulfilling its responsibilities.

The Chief Executive Officer of SCAus, Mathew Tinkler, is accountable to the board and leads the executive team.

SCAus has a robust governance framework and organisational structures comprising policies, procedures and systems, operating within audit and risk management frameworks.

Operations:

SCAus' primary operations consist of:

- implementing programs in the fields of health, education and child protection in Australia and overseas,

- advocacy on child rights and protection, and
- fundraising activities include selling second-hand clothing in opportunity shops around Australia.

The operations of SCAus' controlled entities include consulting, education, research and impact investing.

At the end of 2025, SCAus employed a total of 784 people. Library for All Limited employed 11 people.

SCAus in the Pacific

SCAus, via its wholly owned subsidiary Pacific entities, implements projects in Papua New Guinea, Solomon Islands, Vanuatu and Tonga.

Table 1: SCAus' operations in the Pacific.

Country	Entity	Employees (as at 31 Dec 2025)
Papua New Guinea Established 2011 	Save the Children in Papua New Guinea (SCIPNG) Inc. Association No. 5-4999 under PNG Associations Incorporation Act	47
Solomon Islands Established 2004 	Save the Children Solomon Islands Trust Board (Incorporated) CT 14 of 2015 under Solomon Islands Charitable Trusts Act	83
Vanuatu Established 2013 	Save the Children in Vanuatu Association Committee Inc. No. 012567 under Vanuatu Charitable Associations (Incorporation) Act	58
Tonga 	Save the Children Tonga Trust	3

3. Risks of modern slavery practices in SCAus operations and supply chains^{16(1)(c) of the Modern Slavery Act 2018 (Cth)}

SCAus purchasing extends to local, metropolitan, and regional areas, as well as internationally. SCAus engages third-party suppliers for various operational requirements. Major expenditure

categories also include subcontractor costs, leased property expenses, communications, consulting services and utilities.

SCAus areas of spend include:

- **Program delivery partners and sub-contractors:** This is considered low risk. SCAus mitigates risk by conducting thorough due diligence in partner/contractor selection and requiring contractual compliance with SCAus Supplier Code of Conduct and Child Safeguarding Policies as applicable.
- **Electronic Goods:** SCAus purchases electronic devices (e.g. laptops, monitors, phones) and other related items to facilitate its office operations and service delivery. This industry poses a risk due to global supply chains often involving several sub-contracting arrangements with the potential for use of forced labour in mining raw materials and assembling components.
- **Cleaning and Waste Management Services:** SCAus engages service providers for cleaning and waste management. The cleaning industry poses a risk of modern slavery, and SCAus relies on suppliers to adhere to the Act. SCAus does not directly oversee employment of third-party contract staff. Additional internal systems and procedures include supplier vetting and mandating compliance with SCAus' Supplier Code of Conduct.
- **Clothing, Textiles, and Miscellaneous Products:** SCAus' procurement extends to clothing and textiles, such as t-shirts, lanyards, and tote bags. Although direct oversight of these suppliers' operations is beyond its capacity, SCAus sources from companies that are transparent about labour practices, especially those operating in regions known for labour risks. In these circumstances, SCAus ensures its commitment by engaging in collaborative efforts to assess its supply chains by undertaking company research and completing due diligence checks of companies.

In addition to procurement, SCAus receives donated items from individuals and companies. SCAus is aware of the potential modern slavery risks due to limited oversight over the source of these donations. SCAus' commitment involves collaborating with donors and partners to understand their history, policies and actions taken to prevent modern slavery before accepting major donations, in accordance with its Donation Acceptance and Refusal Policy.

4. Actions taken to assess and address modern slavery risks including due diligence and remediation - Section 16(1)(d) of the Modern Slavery Act 2018 (Cth)

SCAus is committed to taking steps to reduce the risk of modern slavery occurring in its organisation and its supply chains, including through the following means:

- **Awareness:** Promoting awareness of modern slavery risks with all staff and suppliers and mandating compliance with its Code of Conduct.
- **Prevention:** Conducting due diligence during selection of suppliers and donors to mitigate modern slavery risks.
- **Reporting:** Maintaining mechanisms for individuals to report modern slavery issues or concerns. Concerns about modern slavery may be raised with any member of the executive team, General Counsel, or via the whistleblower channel.

- **Responding:** Taking appropriate action when SCAus becomes aware of potential modern slavery issues.

Actions (2025)

Note: The following actions align with commitment outlined in SCAus' 2024 Modern Slavery Statement, as well as ongoing initiatives from prior reporting years.

1. Reducing the risk of modern slavery within SCAus' supply chain:

1.1. The Modern Slavery Working Group

In 2024, SCAus established its Modern Slavery Working Group (MSWG) to strengthen governance and coordination of its response to modern slavery risks. The MSWG comprises representatives from risk, procurement, supporter engagement, and legal teams, and is responsible for developing and overseeing a framework to support staff in meeting SCAus' modern slavery obligations.

In 2025, the MSWG:

- Agreed on its operational framework and Terms of Reference.
- Commenced formal reporting to the SCAus Risk Management Committee, ensuring enhanced oversight, accountability, and integration of modern slavery considerations across organisational risk processes. Modern slavery is now a standing agenda item, enabling regular updates and input.

1.2. Supplier Risk Assessment and Due Diligence

SCAus continues to assess suppliers that may present modern slavery risks. Building on the 2024 review and ongoing contractual requirements to adhere to the SCAus Supplier Code of Conduct, SCAus leverages its Modern Slavery Risk Assessment Tool to improve visibility of risks among suppliers and donors.

Suppliers identified as medium or high risk continue to undergo enhanced due diligence before engagement. All contractors are required to provide a contractual commitment relating to modern slavery.

The Supplier Code of Conduct was refreshed to better reflect current standards and expectations including in relation to modern slavery.

1.3. Procurement Bulk Vetting and System Improvements

The Procurement team undertook a second bulk supplier vetting process during 2025.

Outcomes included:

- No suppliers were identified as high risk.
- Several suppliers were assessed as medium risk and will continue to be monitored.
- The Modern Slavery Risk Assessment Tool is being revised based on lessons learned and feedback from this review.
- The MSWG agreed on clear criteria for when the tool should be applied to streamline efficient and risk focused assessments.

2. Strengthening Internal Capability and Awareness

The MSWG identified Australian Federal Government resources as suitable foundations for modern slavery awareness training for Directors. Work has commenced on adapting these materials for SCAus' governance context, with input from the Organisational Development Advisor.

Policy and Governance:

SCAus ensures that, where relevant, its policies focus on reducing the risk of modern slavery in its operations and supply chain, including:

- *Code of Conduct* - This sets out expectations for the behaviour of all SCAus employees and volunteers and states that SCAus endorses the concept of human rights in general and child rights in particular, and commits to respecting and safeguarding those rights in all decisions and actions. The Code of Conduct specifies SCAus' opposition to modern slavery and its commitment to ensuring that its supply chain is free from modern slavery risks.
- *Supplier Code of Conduct* – This sets out the expectations and mandates certain behaviours and commitments of all SCA suppliers, including its contractors. Applicable third parties engaging with SCAus are required to contractually commit to compliance with this Code.
- *Child Safeguarding Policy* - The Child Safeguarding Policy confirms standards for staff and partners regarding identifying and reporting child exploitation and abuse.
- *Donation Acceptance and Refusal Policy* – This Policy governs the acceptance of donations in situations where there is a perceived risk to SCAus' programming, reputation, financial position or brand in accepting a donation.
- *Procurement Policy* – This policy outlines SCAus' approach to sourcing, selecting and vetting suppliers. The vetting activities performed in accordance with this Policy assists SCAus to identify suppliers who have committed modern slavery offences.
- *Whistleblower Policy* – The Whistleblower Policy and publicly available complaints mechanism facilitate the anonymous raising of whistleblower complaints, including in relation to modern slavery. SCAus encourages individuals to report any misconduct they observe and strictly prohibits retaliation against a whistleblower in accordance with applicable legislation.

Remediation

SCAus has established and implemented policies, procedures, guidance documents and reporting mechanisms to help to prevent and detect modern slavery risks and to take appropriate urgent action to address risks as they arise. The SCAus Executive and Board have oversight of these. Any potential incidents of modern slavery are reported to the Executive with proposals for remediation where applicable.

In the next reporting period:

SCAus is dedicated to ongoing development of awareness and capability within its workforce. SCAus will develop mandatory modern slavery training obligations for its senior leaders.

For Further details on plans to address modern slavery risks, see Annexure A.

5. Assessing the effectiveness of actions taken

Section 16(1)(e) of the Modern Slavery Act 2018 (Cth).

SCAus is committed to approaching its modern slavery obligations with an objective of continuous improvement. In 2025, this work was primarily progressed by the SCAus MSWG.

Whilst progress was made during 2025, there is room for improvement on raising awareness and capability of the wider workforce. SCAus' procurement and supporter engagement teams are embedding modern slavery considerations in their processes; such risks could be better identified within other aspects of SCAus operations. The Risk Management Committee will continue to consult internally about how SCAus can better raise awareness and embed modern slavery practices more comprehensively across the organisation.

6. Consultation

Section 16(1)(f) of the Modern Slavery Act 2018 (Cth)

SCAus receives centralised support from finance, human resources, risk, safeguarding, business services, technology, and legal teams. All group policies and procedures are developed and approved under the Save the Children Policy Framework, which mandates a consultation process throughout the organisation, including with controlled entities of SCAus as applicable.

This Statement was prepared in consultation with SCAus Executive and senior management, including its Principal Child Protection Advisor.

Governing Body Approval

This Modern Slavery Statement was approved by the board of Save the Children Australia on 21 May 2026



Larry Kamener
Board Chair

ANNEXURE A:
Save the Children Modern Slavery Workplan 2026

What is the outcome we are seeking	Actions	How we will do it	Timeframe
Reduce the risk of modern slavery within SCAus' supply chain	1. Continue reviewing supply chain to reduce risk. Ensure contractual commitment relating to modern slavery when engaging contractors.	Implement process improvements for supplier and partner vetting where identified. This includes for procurement and DARP/supporter engagement processes.	Q3 – Q4 2026 (and ongoing)
Further Internal Capability – increased awareness and understanding of modern slavery among Directors and senior leaders.	1. Increase awareness and understanding of modern slavery risks in SCAus' programs.	- Maintain active engagement between Modern Slavery Working Group and Risk Management Committee. - Integrate updates relating to penalties, reporting obligations and regulator powers into quarterly briefings.	Ongoing
	2. Develop and mandate modern slavery training in Director and senior leader induction.	Mandate modern slavery training for senior management/Directors.	Q3 – 2026 (and ongoing)
	3. Run internal campaign to raise awareness of modern slavery.	i. Coordinate communications for Anti-Slavery Day (18 October). ii. Make organisation aware of MSWG. iii. Soft-launch articles on intranet or newsletters aligned with Commissioner updates and consultation milestones.	Q4 – 2026 (and ongoing)

Ensure SCA is positioned to meet strengthened reporting criteria and regulatory scrutiny	Begin aligning SCAus reporting processes with proposed expanded mandatory criteria (grievance mechanisms, remediation, consultation with controlled entities). Prepare for a stronger enforcement regime by documenting processes, ensuring accuracy in statements.	- Review 2025 SCA Modern Slavery Statement against new draft criteria - Enhance data-collection tools to ensure detailed reporting. - Review record keeping.	Ongoing
--	---	--	-----------------------

Annexure B
Approval and Mandatory Criteria

Mandatory Criteria

Mandatory Criteria	Page
a) Identify the reporting entity.	2
b) Describe the reporting entity's structure, operations and supply chains.	2-3
c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	3-4
d) Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	4-6
e) Describe how the reporting entity assesses the effectiveness of these actions	7
f) Describe the process of consultation on the development of the statement with any entities and the reporting entity owns or controls.	7