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Modern Slavery Statement 2022-2023

SSI For equality
of life.

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SSI acknowledges the Aboriginal and Torres Strait Islander peoples as the First Australians and Traditional Custodians of the lands where we live, learn and work. We pay respect to Elders past and present and recognise their continuous connection to Country.

1. Introduction

Settlement Services International Limited (SSI) (ABN 38 031 375 761) is a community organisation and social business that supports newcomers and other Australians to achieve their full potential.

SSI and its subsidiary entities (SSI Group) are committed to combatting modern slavery in their operations and supply chains. This is SSI's third Modern Slavery Statement, prepared pursuant to the Modern Slavery Act 2018 (Cth) (Act), and it outlines the steps the SSI Group has taken during the financial year ending 30 June 2023 to identify, assess and address any potential risks of modern slavery practices in its business operations and supply chains.

2. About us

The SSI Group takes an integrated approach to its work, striving to understand how individuals can thrive within the community in which they live – and the wider Australian society. The SSI Group supports individuals, children, families and communities via a range of vital human services, from settlement support of newcomers and refugees, through to programs in employment and education, and health, wellbeing and social supports for all Australians, new and old.

Some of the communities we serve include: asylum seekers, refugees, and migrants; children, young people, and families; and people living with disability. The SSI Group's activity areas include facilitating settlement and employment, creating community engagement, providing community services, advocacy, developing corporate programs, and influencing international affairs.

To meet this commitment, the SSI Group engages a wide range of professionals including case workers in both settlement and foster care, community engagement and development officers, National Disability Insurance Scheme local area coordinators, youth workers and employment consultants. In addition, the SSI Group has a flexible workforce of Multicultural Support Officers. The service delivery workforce is supported by a Corporate Office function.

The SSI Group is committed to striving to act ethically and with integrity in all business relationships and to implement and enforce effective systems and controls to reduce the risk of modern slavery in the organisation and its supply chains.

The following sets out the mission, vision and values of the SSI Group.

Our mission:

We empower our clients to fully participate in the economic, social, civic and diverse cultural life of Australia, creating a more equitable, resilient, enriched and inclusive society.

Our vision:

To achieve a society that values the diversity of its people and actively provides support to ensure meaningful social and economic participation and to assist individuals and families to reach their potential.

Our values:

Respect, accountability, and inclusion.

2.1. Structure

SSI is a company limited by guarantee and registered under the Corporations Act 2001 (Cth). SSI is also a public benevolent institution registered with the Australian Charities and Not-for-Profits Commission (ACN 606 196 070). SSI’s corporate office is in the Sydney suburb of Ashfield, located at Level 2, 158 Liverpool Road, Ashfield, 2131. SSI has four subsidiaries as outlined below. At the end of the 22/23 financial year, the SSI Group, including SSI’s subsidiaries, employed 1118 staff and operated out of 40 metro and regional NSW, Queensland and Victorian offices and locations.

The SSI Group Board of Directors is responsible for the overall governance of the organisation and is the decision-making body for the SSI Group. The Board Committees assist the Board in fulfilling its corporate governance and oversight responsibilities in relation to risk and compliance obligations. The SSI Group Chief Executive Officer (CEO), Violet Roumeliotis, is accountable to the Board and leads SSI’s Executive Team.





The SSI Group has a robust organisational structure and governance capability, including SSI Group-wide policies, procedures and systems, operating within strong audit and risk management frameworks.



2.2. SSI's subsidiaries

Like SSI, SSI's subsidiary entities are all not-for-profit (NFP) companies limited by guarantee registered with the Australian Charities and Not-for-Profits Commission. SSI's subsidiary entities during the 2022-2023 reporting period were as follows.

Table 1: SSI's subsidiaries

Brand (in addition to SSI)	Entity details
	Access Community Services Limited (ACSL) ABN 45 149 783 639 ACSL is a community based organisation committed to development and capacity building. ACSL has over 30 years of experience providing services to migrants, refugees and Australian-born clients • 106 staff members
	Access Community Enterprises Limited (ACEL) ABN 79 108 738 629 ACEL assists culturally and linguistically diverse (CALD) and mainstream clients with hands-on experience, relevant skills and continual career support to facilitate long-term employment • 5 staff members
	Brisbane Multicultural Arts Centre Limited (BEMAC) ABN 80 964 149 BEMAC is a subsidiary of ACSL. BEMAC offers programs and activities to diverse communities to encourage inclusion and self-development in collaboration with ACSL • 7 staff members
	Multicultural Centre for Mental Health and Well Being Limited (Harmony Place) ABN 36 566 115 721 Harmony Place is a subsidiary of ACSL that provides support in NDIS, mental health, and care coordination to people from all walks of life • 0 staff members



In addition to the above SSI subsidiaries, the following brands were associated with the SSI Group during the reporting period.

Ignite® Small Business Start-ups
IgniteAbility Small Business Start-ups™
Work + Stay
Multicultural Sports Club Queensland
Multicultural Youth Queensland

2.3. Operations

The SSI Group is one of the largest providers of support services for migrants, refugees and asylum seekers in Australia, and about 45 per cent of funding is linked to new arrivals. The SSI Group also delivers services in a number of other human services areas, to support all people who have experienced vulnerability to build capacity and enable them to overcome inequality.

The SSI Group operates out of 40 locations in metro and regional NSW, Victoria, and Queensland.

The SSI Group undertakes a range of operational activities to pursue its business strategy and purpose. These include the following:

- **Direct employment of workers:**

The SSI Group employs, contracts and seconds a range of individuals to assist and support in the delivery of SSI programs and services.

- **Provision and delivery of services:**

The SSI Group delivers a range of programs to the community including:

- Settlement support services for new arrivals to Australia
- Social inclusion and community engagement programs
- Community health and wellbeing programs, including domestic violence
- Disability services including NDIS Local Area Coordination services
- Multicultural Foster Care programs
- Employment services
- Entrepreneur support services through the Ignite program
- Recruitment services, through the Work+Stay program
- Home Care Workforce Support program

- Arts and culture programs
- Training services
- Housing support services, and
- Capacity building programs and advocacy efforts.

- **Leasing of property:**

The SSI Group's Housing Programs support clients with securing short- and long-term accommodation – some of these programs involve the leasing of properties by the SSI Group, which are then sub-leased to clients.

- **Research:**

The SSI Group collaborates with other NFPs, research organisations and universities to conduct research and participate in research to better understand the needs and aspirations of the communities it serves.

- **Fundraising and charitable activities:**

The SSI Group engages in charitable activities beyond its normal provision of services. This includes obtaining funding from donors and corporate partners for the provision of initiatives such as scholarships for refugees, sponsorship of arts and culture festivals, other community engagement activities, as well as in-kind donations for goods and services.

- **International Operations:**

SSI works to influence global policy around migrants, refugees and people seeking asylum. SSI participates in key global forums, provides thought leadership and contributes to capacity building of the sector through key partnerships.

2.4. Supply chains

Purchases by the SSI Group are made locally in metro and regional areas where the SSI Group operates, as well as internationally, particularly for software licensing and information technology and communications (ITC) goods and services. Having examined the Modern Slavery Statements of some of the SSI Group's larger international suppliers, for example, multinational computer technology companies, it can also be noted that the supply chains of these organisations extend into China, South-East Asia and other regions. The SSI Group also procures goods and services from third-party suppliers and subcontractors.

As reported in the last Statement, major spend categories include subcontractor costs, including salaries and employment costs, ITC goods and services used by SSI Group staff, white goods, leased property costs, including office spaces and housing for clients, communications, consultants and utilities.

Through the function provided by Infomed365, the SSI Group continues to seek confirmation from its larger suppliers regarding the existence of Modern Slavery Policies and Statements.

3. Approach to modern slavery

3.1. Overview

The SSI Group is committed to implementing systems to:

- **Identify and assess** potential areas of risk of modern slavery occurring in its operations and supply chains
- Mitigate the risk of slavery and human trafficking occurring in its operations and supply chains, and
- **Monitor** potential areas of risk in its operations and supply chains.

To achieve these goals, the SSI Group is working towards, or aspires to:

- Review and address operational risks that are not consistent with the values of SSI Group and provisions of the Act
 - Conduct due diligence on the modern slavery risks in its supply chain and operations
 - Periodically conduct audits on large or high-risk suppliers and contractors and SSI's own operations
 - Take steps deemed necessary to address any risks or potential risks that have been identified
 - Implement a process to assess the effectiveness of the steps taken to address potential risks of instances of modern slavery
 - Monitor and review the effectiveness of the modern slavery risk management framework and processes, and
 - Provide SSI Group staff with adequate training to increase awareness and understanding of risks and consequences of modern slavery as appropriate.
-

3.2. Highlights of this year's progress

During the financial year (FY) 2022-23, the SSI Group took several important steps in its approach to combating modern slavery. The SSI Group will continue to build on these strategies and actions, and assessing their effectiveness, during the next reporting period.

In summary, during the FY2023 the SSI Group:

- Continued to utilise Infomed365's self-assessment questionnaire for assessing suppliers, delivered training to managers on using Infomed365, and continued participation in the Purpose consortium with other NFPs
- Continued to engage with suppliers to ensure a mutual commitment to combatting modern slavery, and to include modern slavery provisions in contracts with its suppliers, contractors and subcontractors to support that commitment
- Continued the mandated requirement for staff to undertake Modern Slavery E-Module training, in order to raise awareness of the prevalence and impact of modern slavery
- Engaged with the New South Wales (NSW) Anti-Slavery Commissioner (Commissioner) and connected the Commissioner to a migrant community in regional NSW to consult regarding modern slavery
- Virtually attended the Attorney-General's Department 2023 Modern Slavery Conference, by invitation, and the Modern Slavery: A Fireside Chat with the Anti-Slavery Commissioner Dr James Cockayne and recorded learnings from both forums

- Received funding under the National Action Plan to Combat Modern Slavery 2020-25 Grants Program to work with communities at risk of modern slavery
- The CEO of SSI was appointed to the NSW Advisory Panel on modern slavery (July 2023).

These initiatives will be expanded upon in the remainder of the Statement.

3.3. Consultation with subsidiary entities

Although none of SSI's subsidiaries are reporting entities themselves under the Act, the SSI Group recognises the importance of a collaborative approach in combatting modern slavery risks within the group's operations and supply chains.

SSI and its subsidiaries have integrated their operations, which includes oversight of SSI's subsidiaries by senior management within SSI, the same CEO and a mirror board. The financial systems and management processes across the SSI Group have also been integrated and are now managed centrally, meaning that all supplier transactions are now bound by the same processes and protocols.

This Statement reports on risks and actions taken across the whole SSI Group, including SSI's subsidiary entities in the FY2023. Considering the integrated structure, senior management overseeing SSI's subsidiaries have been consulted and have reviewed and had input into this Statement, including the State Director for Queensland.

4. Identifying and assessing risks

The SSI Group has taken steps towards identifying risks of modern slavery practices in its operations and supply chains. Through a high-level assessment of SSI Group's supplier list, the SSI Group has been able to identify high, medium and low risk suppliers.

The following modern slavery risks (including potential or possible risks) have been identified in operations and supply chains.

SSI Group Operations Identified Risks

- The SSI Group engages volunteers and students in most of its programs and is conscious of modern slavery considerations. During the FY2023 reporting period, the SSI Group engaged 98 volunteers and 51 student placements. Volunteers are informed at the application stage, during onboarding, and at induction, that they may volunteer up to a maximum of 16 hours per week. Additionally, volunteer supervisors are reminded of this regularly.
- The SSI Group's Employment Services programs and its Work + Stay recruitment program seek to place vulnerable people in employment opportunities. The SSI Group undertakes modern slavery due diligence on the employer companies, however, acknowledges there are limitations as to the due diligence checks, as well as a risk that the employers may not comply with the SSI Group's modern slavery mitigation requirements. As part of our commitment to protecting the rights of vulnerable workers, the SSI Group also participates in the National Panel of Assessors Program.

Supply Chains Identified Risks

- The SSI Group engages with multinational suppliers in the IT and Telecommunications industries as detailed above. Based on the nature of these types of organisations (as having highly complex global supply chains), and on the published Modern Slavery Statements of these organisations, the SSI Group can identify the following possible risks:
 - Lack of control over overseas workforces as these organisations typically operate and have suppliers in geographically high-risk regions, and in industries that are known to be high risk for workers (for example, mining and manufacturing). As such, there is a risk that the SSI Group's suppliers will not have sufficient control over forced labour and exploitation within their own supply chains.
 - Risk of using third party suppliers who have not conducted any form of modern slavery risk assessment.
- The SSI Group engages suppliers of cleaning and other maintenance services, for the maintenance of its premises. The cleaning industry is a known high-risk industry, and the SSI Group does not have oversight of the working conditions of these suppliers other than for a commitment from such suppliers to comply with the Act.
- The Humanitarian Settlement Program (HSP) provides refugees in Australia with support services. The HSP utilises a range of subcontractors and suppliers to deliver services to clients. Whilst the SSI Group undertakes modern slavery due diligence on the subcontractors and major suppliers by requiring completion of the questionnaire on the Informed365 platform, there may be value in

undertaking additional supplier audits of larger suppliers.

- The SSI Group subcontracts a number of Migrant Resource Centres (MRCs) all of which are NFPs, to deliver services to local communities. This accounts for approximately 10% of SSI Group's total expenditure. The MRCs are not reporting entities under the Modern Slavery Act 2018 (Cth). As such, a high-level risk assessment of the operations and supply chains of those subcontractors may not have been undertaken, which may pose a risk to the SSI Group.
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5. Actions and measuring effectiveness

5.1. Due diligence

5.1.1. Supplier Assessment

Self-Assessment Questionnaire (SAQ)

During the FY2023 reporting period, the SSI Group continued the implementation of its initial Modern Slavery Questionnaire (Questionnaire) process that was developed.

A representative from the SSI Group continued attending regular meetings with the consortium of NFPs called Purpose, through Informed365, to benefit from the combined use of an external supply chain management application. Purpose has an imbedded Questionnaire which enables the SSI Group's suppliers to complete, view and update their responses in real time through the platform. Through the consortium approach, suppliers who have already completed the Questionnaire for another NFP consortium member can choose to share their previous answers with the SSI Group as well, thereby helping to reduce barriers to suppliers completing the Questionnaire. The Purpose platform includes a risk assessment of suppliers based on their answers to key questions, which enables the SSI Group to make a better assessment.

During the reporting period, the SSI Group identified that the Purpose platform could be better utilised to identify and mitigate potential risks in relation to suppliers. Utilisation of the platform to its fullest capacity has been a challenge due to limited resourcing. The SSI Group will consider strategies to address this in the FY2024.

Supplier audits

Due to resourcing constraints during the FY2023 reporting period, the SSI Group was unable to commence implementing its supplier audit procedure as intended. The SSI Group may undertake sample auditing of larger suppliers in the next reporting period.

5.1.2. Tender strategy

The SSI Group Bids and Tenders unit conducts a due diligence process of funders with whom it intends to respond to tenders. As part of this process, and particularly for philanthropic alliances, consideration is given to who the funder is, including whether there is ethical alignment with the SSI Group's values and aligned with SSI's fundraising framework.

Where it is indicated that as part of the tender the SSI Group will partner with an organisation, the Bids and Tenders unit encourages Executive management to conduct further due diligence. Additionally, the Questionnaire is embedded in the contract review process, including for partnership agreements and Memorandums of Understanding. This forms a crucial part of SSI Group's process in the Bids and Tenders unit. Its effectiveness may be considered in future reporting periods.

5.1.3. Modern slavery contract clauses Actions taken

In the FY2023 reporting period, the SSI Group continued to include Modern Slavery clauses in contracts with new suppliers and partners (including international partner organisations), since first introducing these in April 2020. Such clauses have also been included in existing SSI Group contracts when they are due for review or renewal.

The SSI Group has many contracts with suppliers, contractors, and subcontractors,

with new contracts being entered into regularly. During the reporting period, as a standard practice, the SSI Group continued to negotiate with most new suppliers, contractors and subcontractors to include clauses within the contractual arrangements requiring them to:

- Represent, warrant and undertake that they conduct their business in a manner that is consistent with the principles of any applicable Modern Slavery laws, even if they do not have a statutory duty to comply with such laws
- Take reasonable steps to:
 - assess, address and reduce any risks of modern slavery or human trafficking in their supply chains or in any part of their operations
 - ensure that each of their consultants, subcontractors, agents and suppliers also conduct business in the manner described above (noting that this may require them to review contractual arrangements with their own suppliers), and
 - notify the SSI Group if they become aware of any actual or suspected modern slavery practices in their own operations or in a supply chain that has a connection with their arrangement with the SSI Group.
- Comply with any requests by the SSI Group to provide evidence of their assessment of modern slavery risks in their supply chains.

Measuring effectiveness

During the FY2023 reporting period, most suppliers, contractors, and subcontractors agreed to include modern slavery clauses in their contracts with the SSI Group. On the rare occasion where a supplier refuses to incorporate modern slavery clauses into their contracts, an informal risk assessment is undertaken by management to determine whether the SSI Group will engage with the supplier.

The SSI Group will continue to monitor the amenability of suppliers, contractors and subcontractors to accept amendments to contracts regarding modern slavery provisions and will also strengthen its risk assessment process where suppliers refuse such amendments to their terms.

The contractual clauses coupled with the SSI Group's other supplier engagement actions in relation to modern slavery identified above [see section Due Diligence: Supplier Assessment] help to inform the SSI Group's stakeholders of its position against modern slavery practices and assist to determine if those stakeholders have a similar commitment to addressing modern slavery.

5.2. Remediation processes

Actions taken

The SSI Group has a standalone Whistleblower Policy, providing a formal and confidential mechanism for staff and other stakeholders to report suspected misconduct and improper affairs, which may include identified risks of modern slavery practices. Staff can also raise concerns about their own working conditions through the SSI Group's Grievance Resolution Policy and Procedure. The Whistleblower Policy was updated and approved by SSI Group's Board during the reporting period on 29 June 2023.

All staff are required to complete the online Whistleblowing Training course provided by the SSI Group. To ensure the effective implementation of the policy, additional training is provided to executive staff and members of the Board, with the next session planned for the FY2024.

In addition, under the contractual provisions [see section Due Diligence: Modern Slavery Contract Clauses], the SSI Group's suppliers and contractors are contractually obligated to notify the SSI Group of any risks of modern slavery practices in their own operations and supply chains relating to their work with the SSI Group. Where a modern slavery risk is identified or suspected, the SSI Group (or the relevant subsidiary) aims to work with the supplier, contractor or subcontractor to better understand the risk and develop a remediation plan, if appropriate.

Measuring effectiveness

SSI Group's policies and procedures are all subject to a regular review process, which provides an opportunity to identify areas for improvement. To supplement the Whistleblower Policy, training will also be held in the 2023-2024 financial year.

5.3. Staff training

Actions taken

During the FY2022-23 reporting period, staff of the SSI Group continued to engage in the mandatory Modern Slavery e-learning module, designed to: raise awareness of modern slavery to recognise what it is; understand why it is relevant to our organisation; what SSI and its subsidiaries are doing to address modern slavery; and what staff responsibilities are in terms of reporting modern slavery risks. Staff are required to complete an assessment task to confirm their understanding of the e-module.

In the FY2023 reporting period, the SSI Group, in conjunction with Informed365, delivered training to managers on using the platform to onboard suppliers for completion of the Questionnaire and reviewing Questionnaires. A refresher training on using Informed365 will be held in the FY2024 with managers invited to attend. Additionally, an informal session on modern slavery will be presented to all staff during a "Lunch n' Learn" session.

Measuring effectiveness

In order to complete the e-module, staff will need to obtain a minimum score of 80% to demonstrate sufficient understanding of modern slavery principles. As at 30 June 2023, 648 staff members had completed this e-module, with more staff to complete the e-module in the next reporting period.

5.4. Recruitment and employment

Actions taken

People have always been the SSI Group's most important asset and the means through which we provide support to our diverse client base. Our ongoing work around our people includes increasing the diversity of our workforce, striving to create safer, healthier workplaces, and encouraging learning and personal growth among individual staff members.

In addition to the SSI Group's recruitment policy that mandates Criminal History and "Working with Children" background checks, and "right to work" compliance checks, SSI Group staff are employed or contracted in accordance with the Fair Work Act 2009 (Cth), industry awards where applicable (such as the SCHCADS award) and Work Health and Safety laws. In addition to the SSI Group's Grievance Resolution Policy and Procedure, all SSI Group staff are supported by a highly qualified People and Culture team, whereby working conditions and concerns are acknowledged and resolved. This is supported by the SSI Group's Flexible Working Policy, which goes beyond Fair Work Act 2009 (Cth) and award standards.

Measuring effectiveness

The SSI Group's policies and procedures are all subject to a regular review process, which provides opportunity to identify areas for improvement. Staff are also consulted about their experiences of working at SSI Group through comprehensive staff-wide surveys, providing them with an opportunity to raise concerns. During the FY2023 reporting period, the SSI Group staff were asked to complete a Pulse Survey. The Pulse Survey received a 69% completion rate and an

engagement score of 76%. The information gathered from the survey provided evidence that our workforce is experiencing high levels of satisfaction with people stating that they are proud to work at the SSI Group, being the highest rated response.

6. Other activities

6.1. Funding to combat modern slavery

In the FY2023 reporting period, the SSI Group was awarded a grant under the National Action Plan to Combat Modern Slavery 2020-2025 (Round 2) by the Federal Government for the SToP (Strategies to Prevent) Modern Slavery Project (the Project), to be delivered over two years. The Project aims to build the capacity of multicultural communities to increase awareness, and implement prevention strategies, to combat and reduce modern slavery in Australia. It will focus on community education, particularly around forced marriage, servitude, trafficking, and serious exploitation of labour. In the first year, the Project will focus on training bilingual staff and developing culturally appropriate materials and tools, including the use of vignettes to trigger conversation and discussions. In the second year, a bilingual workforce will use the materials to conduct information and awareness raising sessions with targeted communities, schools and settlement and migrant organisations across Queensland, New South Wales and Victoria.

6.2. Engagement with NSW Anti-Slavery Commissioner

During the FY2023 reporting period, the SSI Group Executive representatives met with the NSW Commissioner to discuss defining forms of modern slavery and servitude, and the scope of the Commissioner's role. The Commissioner is interested in exploring how the SSI Group and the Commissioner's office can work together, which the SSI Group supports.

During the reporting period, the SSI Group invited the NSW Commissioner to Armidale for the launch of the SSI Group commissioned research entitled "Reflecting on 5 years in Armidale" and follow-up informal meeting with Ezidi community representatives, facilitated by SSI Group staff. The meeting with Ezidi supporters and a representative of the community discussed issues the Ezidi have encountered and their ongoing settlement needs. The NSW Commissioner was interested to hear of both historic and current issues of modern slavery and may consider the experiences shared as he formulates his workplan.

6.3. Modern Slavery Conference and Fireside Conversation

During the FY2023 reporting period, an attendee from the SSI Group virtually attended the 2023 Modern Slavery Conference, hosted by the Commonwealth Attorney-General's Department, in partnership with the Australian Institute of Criminology. The theme was "Taking Action Together", which reflected on collaborative modern slavery responses. The conference

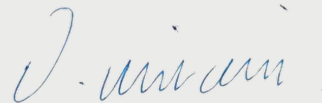
brought together speakers and stakeholders from business, academia, government, civil society and survivors to collaborate on responses. Attendees from the SSI Group also attended “Modern Slavery: A Fireside Chat with the Anti-Slavery Commissioner Dr James Cockayne” on 23 February 2023. The purpose of this session was to discuss the Modern Slavery Act 2008 (NSW) and was predominantly attended by NFPs.

6.4. Appointment to the NSW Advisory Panel

Whilst this falls within the new financial year, the SSI Group note that the CEO of the SSI Group, Violet Roumeliotis AM, was appointed to the NSW Advisory Panel in July 2023. The Advisory Panel will provide advice and guidance to the NSW Commissioner whilst implementing his Strategic Plan 2023-2026, “Working Together for Real Freedom”. Advisory Panel members include leaders from human rights groups, business, public services, researchers, and community organisations. The SSI Group looks forward to engaging on the NSW Advisory Panel in an effort to combat modern slavery.

7. Authorisation

This Modern Slavery Statement was approved by the Board of Settlement Services International Limited on 28 September 2023. Please also refer to Annexure A: Approval and Mandatory Criteria for further details.



Voula Messimeri
SSI Group Chair

Annexure A: Approval and mandatory criteria

Principal Governing Body Approval

This Modern Slavery Statement was approved by the principal governing body of Settlement Services International Limited, and its subsidiaries, Access Community Services Limited, Access Community Enterprises Limited, Brisbane Multicultural Arts Centre Limited and Multicultural Centre for Mental Health and Well Being Limited (SSI Group) as defined by the Modern Slavery Act 2018 (Cth) (the Act) on 28 September 2023.

Signature of Responsible Member

This Modern Slavery Statement is signed by a responsible member of SSI Group as defined by section 4 of the Act.

Signature 

Date **29 November 2023**

Voula Messimeri
SSI Group Chair

Mandatory criteria

The following table indicates the page number/s of the statement that addresses each of the mandatory criteria in section 16 of the Act.

Mandatory Criteria	Pages
a) Identify the reporting entity	3-5
b) Describe the reporting entity's structure, operations and supply chains.	4-7
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.	10-11
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.	12-15
e) Describe how the reporting entity assesses the effectiveness of these actions.	12-15
f) Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).	9
g) Any other information that the reporting entity, or the entity giving the statement, considers relevant.	16-17

We're SSI.
We stand for a world in which everyone
has access to equal opportunity.
We are driven by equality, empathy,
and celebration of every individual.
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