

# Modern Slavery Statement

2022



# Contents

A Message from ASC	1
Our Achievements	2
About our Statement	3
About ASC	3
Organisational Structure	3
Operations and People	4
Supply Chain	4
Policies and Governance	5
Modern Slavery Framework	6
Governance Structure	7
Policies and Procedures	8
Modern Slavery Risks	9
Operations	9
Supply Chain	9
Modern Slavery Due Diligence and Risk Management	12
Managing Operational Risks	12
Managing Supply Chain Risks	12
Remediation	13
Monitoring Performance and Reporting	14
Looking Ahead: 2022-2023	15
Appendix	16

# A Message from ASC

On behalf of ASC Pty Ltd (ASC), we are pleased to endorse the company's 2022 Modern Slavery Statement.

This document charts the progress of ASC's Modern Slavery Three-Year Risk Management and Implementation Plan (2020-2022), including this period's focus on continuous improvement.

Important steps were taken across all four strategic pillars: Corporate Governance; Policies and Procedures; Due Diligence; and Monitoring and Reporting. Notably, we reviewed and updated many policies and procedures, implemented and began monitoring modern slavery key performance indicators (KPIs), and broadened our modern slavery risk assessments for suppliers to include those outside Tier 1 Australia-based businesses.

This was achieved in a challenging operating environment, with ongoing economic and labour pressures caused by the COVID-19 pandemic.

While the 2020-2022 plan is complete, it does not signify an end to our efforts. ASC's Modern Slavery Working Group (MSWG) has developed a new 2023-2025 plan to ensure this critical work continues.

An exciting element of this new plan will be the opportunity to share local and international knowledge and experience, through avenues such as industry partnerships and membership of the UN Global Compact – Modern Slavery Community of Practice.

We remain committed to identifying, mitigating and eliminating modern slavery from our operations and supply chain, aligned with ASC's mission, vision and core PRIDE values: Protect, Respect, Integrity, Discipline and Excellence.

This statement was approved by the ASC Board on 11 November 2022.



Bruce Carter  
CHAIRMAN



Stuart Whiley  
MANAGING DIRECTOR AND  
CHIEF EXECUTIVE OFFICER

# Our Achievements



## 2021-2022

### Corporate Governance

- Developed ASC's Modern Slavery Three-Year Risk Management Implementation Plan for 2023-2025.

### Policies and Procedures

- Updated policies, procedures and Supplier Code of Conduct in line with our current modern slavery risk management practices.

### Due Diligence

- Completed annual risk review of Tier 1 suppliers in accordance with our modern slavery risk framework.
- Engaged a third party to expand our supply chain risk assessment beyond Tier 1 suppliers.
- Completed modern slavery risk awareness activities with high-risk suppliers.

### Monitoring and Reporting

- Implemented modern slavery KPIs and ongoing monitoring.

# About our Statement

This Modern Slavery Statement is made by ASC as a joint statement under the *Modern Slavery Act 2018*<sup>1</sup> (the Act), for the 2021-2022 financial year. It covers ASC Pty Ltd and its subsidiaries: ASC AWD Shipbuilder Pty Ltd, and ASC OPV Shipbuilder Pty Ltd (together, for the purposes of this statement, "ASC"). The statement was developed in consultation with each subsidiary.

## About ASC

ASC has proudly served as Australia's sovereign submarine builder and sustainer for more than 35 years. As the nation's only sovereign-owned submarine company, we proudly serve the frontline of Australia's naval defence capability. Supported by our predominantly Australian supply chain and highly skilled workforce, we deliver world-class submarine performance to the Royal Australian Navy (RAN).

We leverage the opportunities provided by our central role in Australia's maritime defence value chain to influence and drive actions to better identify and address modern slavery risk.

## Organisational Structure

ASC is a proprietary company limited by shares registered under the *Corporations Act 2001* and is subject to the *Public Governance, Performance and Accountability Act 2013*. All ASC share capital is owned by the Commonwealth of Australia, represented by the Minister for Finance. ASC is a Government Business

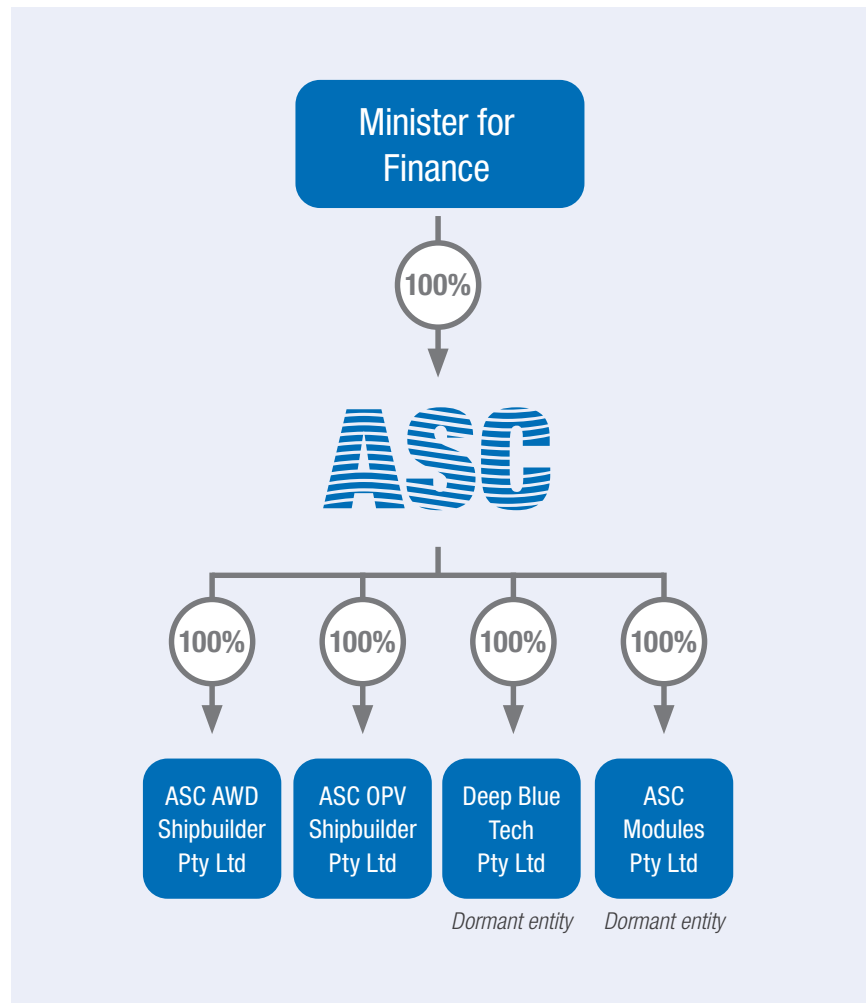


Figure 1: ASC Group structure.

Enterprise (GBE) pursuant to s. 5(2)(a) of the *Public Governance, Performance and Accountability Rule 2014*.

ASC has two active wholly Australian Government-owned subsidiaries (ASC AWD Shipbuilder Pty Ltd and ASC OPV Shipbuilder Pty Ltd) and two dormant

subsidiaries (Deep Blue Tech Pty Ltd and ASC Modules Pty Ltd). ASC's Executive Team and Board manage and govern ASC, including all subsidiaries. ASC's group structure is shown in Figure 1.

**Vision:** To be Australia's sovereign submarine builder and maintainer – indispensable in delivering our nation's maritime strategy.

**Mission:** To be a trusted and efficient partner with sovereign design, build and sustainment capabilities, driving best value for our customers.

<sup>1</sup> *Modern Slavery Act 2018* (legislation.gov.au)

## Operations and People

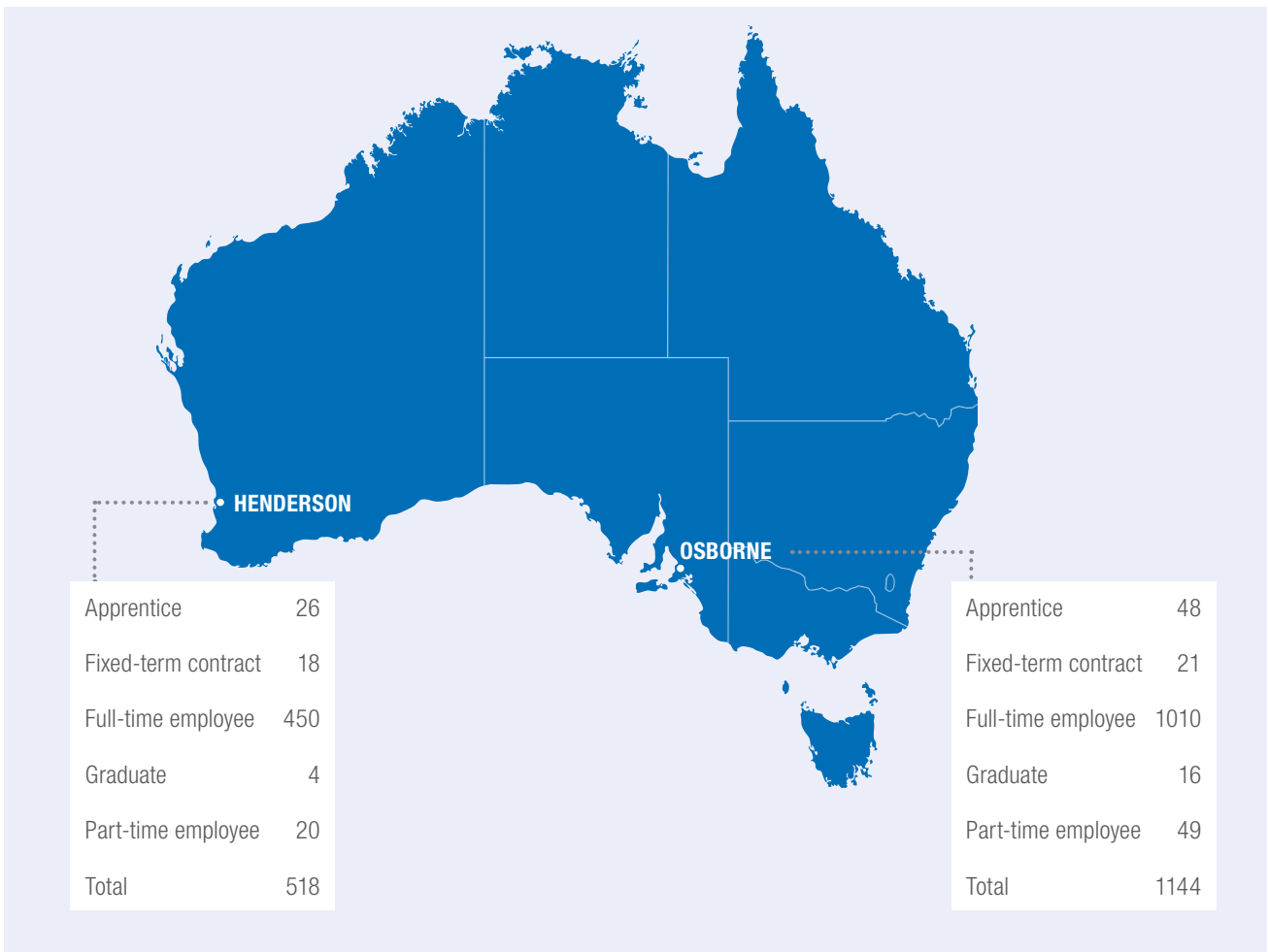


Figure 2: ASC's workforce as at 30 June 2022.

ASC's workforce of more than 1,600 employees nationally is located at ASC's sites in Osborne, South Australia and Henderson and Garden Island, Western Australia. Approximately 90% of employees are permanently employed, around 2% are on fixed-term contracts and the remainder are casual. As of 30 June 2022, 1% of ASC's apprentices were under 18 years of age.

During the 2021-2022 reporting period, ASC was contracted to the Australian Government to deliver the Sovereign Shipbuilding Talent Pool to retain, grow and develop the shipbuilding workforce

impacted by the Attack Class Submarine Program's discontinuation. This resulted in an increase of 179 new employees by 30 June 2022.

### Supply Chain

ASC manages the largest and most complex supply chain operations ever required by the RAN. ASC is integral to Australia's sovereign naval industrial capability through our partnerships, supply chain excellence and high levels of Australian industry content. Over 90% of our suppliers are domestic businesses.

ASC is committed to maximising Australian industry participation to enhance Australia's sovereign submarine capability.

Our supply chain includes a diverse range of suppliers spanning numerous sectors. During the reporting period, ASC's total supplier spend was \$392.38 million across 1,235 suppliers. The majority of our direct, or "Tier 1", suppliers are located in Australia, Europe and North America.

# Policies and Governance

At ASC, we live by our PRIDE values: Protect, Respect, Integrity, Discipline and Excellence. This ensures we build a safe, engaged and customer-focused culture, which underpins our four modern slavery strategic pillars (Figure 3). This foundation provides the governance and corporate structure to develop, implement and monitor our approach to eradicating modern slavery throughout our operations and supply chain.



Figure 3: ASC's modern slavery commitment, strategic pillars and PRIDE values.

## Modern Slavery Framework

ASC's commitment to eradicate modern slavery in its operations and supply chain is guided by our Modern Slavery Three-Year Risk Management Implementation Plan (2020-2022). Adopting a three-phase approach (Figure 4), the plan provides the framework to identify, assess and manage our modern slavery risks, and monitor progress against commitments and the Act.

In 2021-2022, we entered the plan's third and final phase, Continuous Improvement, where we enhanced our practices and approach to modern slavery risk.

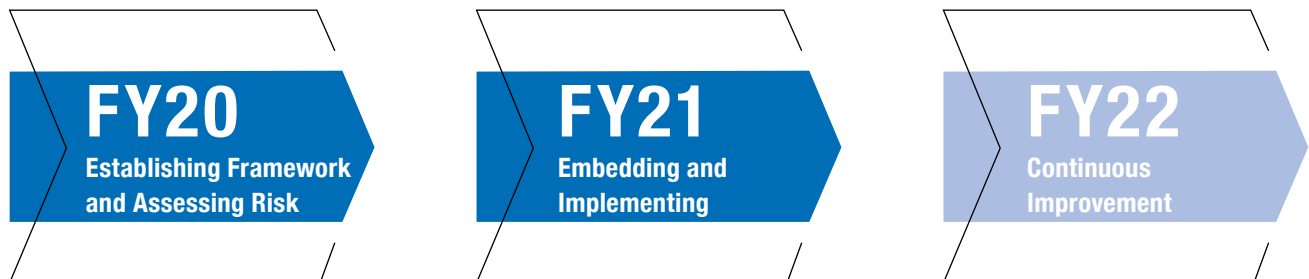


Figure 4: The three phases of ASC's Modern Slavery Three-Year Risk Management Implementation Plan (2020-2022).

During the reporting period, ASC's MSWG developed the company's Modern Slavery Three-Year Risk Management Implementation Plan for 2023-2025. The new plan has been endorsed by ASC's Modern Slavery Executive Sponsors.

PRIORITY AREAS FOR 2023-2025	PLANNED ACTIVITY
<b>Reporting</b>	<ul style="list-style-type: none"> <li>Draft and submit an annual Modern Slavery Statement to the Australian Border Force each year.</li> </ul>
<b>Policy and Governance</b>	<ul style="list-style-type: none"> <li>Continuously review and enhance policies relating to ASC's modern slavery risk.</li> <li>Annually review and update modern slavery KPIs.</li> <li>Seek United Nations Global Compact – Modern Slavery Community of Practice membership and actively participate.</li> </ul>
<b>Procedures</b>	<ul style="list-style-type: none"> <li>Continuously review and enhance ASC's procedures and processes relating to modern slavery.</li> <li>Continuously review and enhance ASC's contract and purchase order templates with regards to modern slavery obligations.</li> </ul>
<b>Risk</b>	<ul style="list-style-type: none"> <li>Complete annual modern slavery risk assessments for ASC operations, including other ASC entities and onsite contractors.</li> <li>Develop an action plan to monitor risk mitigation activities following risk assessments.</li> <li>Develop a trend analysis report to track ongoing category/country modern slavery risk.</li> </ul>
<b>Awareness</b>	<ul style="list-style-type: none"> <li>Raise ASC employees' awareness of modern slavery risks via an annual training module, with further targeted training for supply chain personnel.</li> <li>Investigate potential partnerships with industry groups.</li> </ul>



## Governance Structure

ASC has established a robust governance structure to oversee modern slavery risk management across our operations and supply chain. This structure defines the roles and relationships between our shareholder, the Minister for Finance; the ASC Board; management; employees; and supply partners (Figure 5).

**The Business Assurance and Security Committee** is responsible for assessing ASC management's approach to minimising and managing the company's exposures to all areas of material business risks, including modern slavery. The committee met four times in 2021-2022.

**The Executive Safety, Environment and Quality (ESEQ) Council** is responsible for reviewing ASC's strategies, policies, risk exposure, targets and performance. Where appropriate, it reviews our suppliers' and contractors' work health and safety, quality assurance, environmental sustainability and product safety. The ESEQ met four times in the reporting period.

**The Executive Risk Management Committee (ERMC)** is responsible for overseeing ASC's Risk Management Framework, in alignment with AS/NZS ISO 31000:2018 Risk Management Standard. The ERMC is principally responsible for establishing and maintaining ASC's risk profile, which includes monitoring risk reporting, identifying material risk, and advising the Executive and Board on risk-related matters, including modern slavery. The ERMC met 12 times in the reporting period.

**The Human Resources and Remuneration Committee (HRRC)** assists the Board to fulfil its corporate governance and oversight. This includes performance measurements and accountability frameworks; recruitment

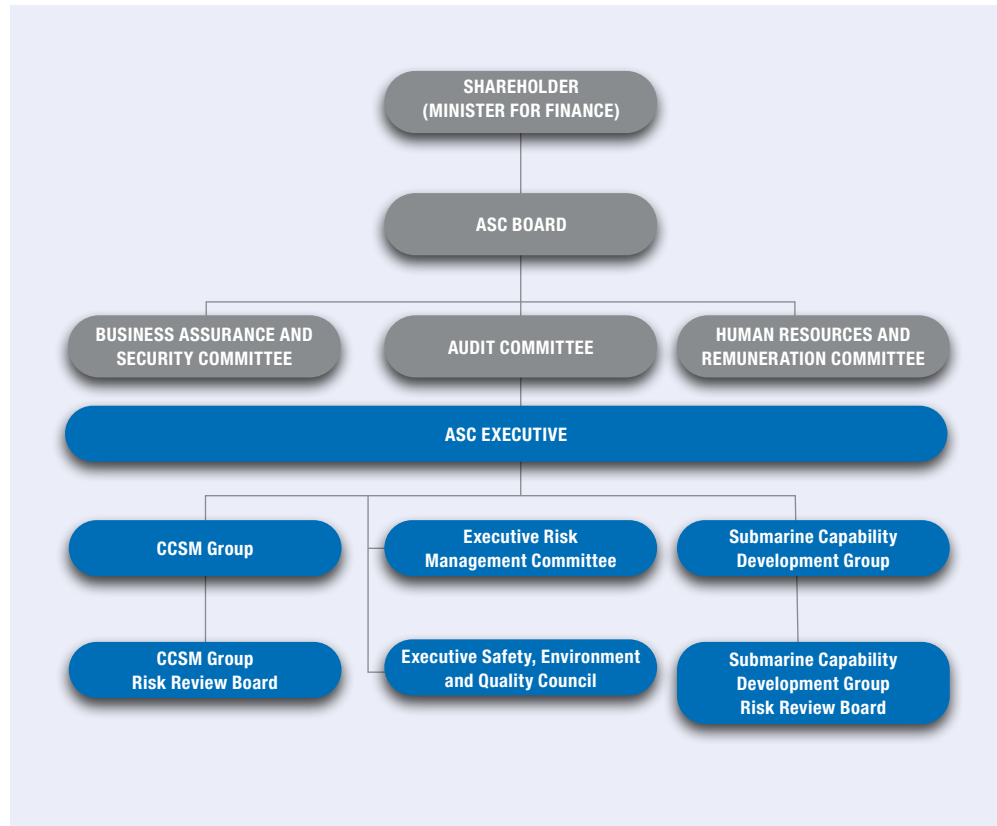


Figure 5: ASC's modern slavery governance structure.

and retention; talent management and succession planning; and remuneration components. The HRRC met five times in the reporting period.

**The MSWG** operates across departments and is sponsored by two ASC Executive Managers. The MSWG is tasked with providing governance and leadership to deliver ASC's modern slavery commitments, including:

- Implementing our modern slavery compliance framework to identify, address and remediate modern slavery risk.
- Overseeing the development of ASC's annual Modern Slavery Statement.
- Tracking implementation of ASC's current Modern Slavery Three-Year Risk Management Implementation

Plan to improve our systems, processes and controls.

- Developing ASC's new Modern Slavery Three-Year Risk Management Implementation Plan (2023-2025).
- Developing and delivering an ongoing system of education to build awareness of modern slavery across ASC's Board, Executive, staff and suppliers.
- Providing regular progress reports to the Executive and Board.

The MSWG met six times in the reporting period.

## Policies and Procedures

ASC has established formal codes of conduct for employees and suppliers. Both codes were updated in 2021-2022.

ASC also reviews and updates its Modern Slavery Process, Whistleblower Protection Process, Supply Chain Policy and Procurement Manual where required.

POLICY/PROCESS	ASC	SUPPLIERS	PURPOSE
<b>Modern Slavery Process</b>	✓	✓	Describes ASC's commitments with respect to the Act; what it is doing to manage modern slavery risk; and how it will identify, report, investigate and remediate instances of modern slavery.
<b>ASC Code of Conduct</b>	✓		Articulates the high standards of honesty, integrity, ethical and law-abiding behaviour expected of ASC's directors, employees and contractors.
<b>Supplier Code of Conduct</b>		✓	Outlines expected supplier behavioural standards in relation to ASC's values; labour and human rights, including compliance with the Act; health and safety; environment and community; and confidentiality.
<b>Anti-Fraud Process and Fraud and Corruption Control Framework</b>	✓	✓	Outlines ASC's commitment and approach to complying with laws and regulations addressing fraud, bribery and corruption that can facilitate slavery and other forms of exploitation in the value chain.
<b>Whistleblower Protection Process</b>	✓	✓	Ensures any ASC employee disclosing a contravention of the law, including the Act, can do so without fear of reprisal, and with certainty of fair and confidential treatment.
<b>Risk Management Framework</b>	✓		Includes guidance for the identification and management of modern slavery risks.
<b>Supply Chain Policy</b>	✓	✓	Seeks to deliver a safe, secure, sustainable and value-for-money supply chain through an effective governance framework that enables good-faith dealings and transparent commercial processes. By creating sustainable supply, ASC ensures that the economic and other benefits of our procurement spend flow through more equitably to all workers in our supply chain.
<b>Procurement Manual and Guide</b>	✓		Stipulates all ASC procurement activities should be undertaken in a fair and ethical manner consistent with our Code of Conduct, with particular emphasis given to consideration of modern slavery risks. Outlines key procurement principles: achieve best value for money; apply fair and effective competition; and undertake procurement in an ethical manner.
<b>People and Culture Manual</b>	✓		Provides an overview of ASC's People and Culture-related policies and procedures; details conditions of employment; and outlines how we are complying with our <i>Fair Work Act 2009</i> <sup>2</sup> obligations.

<sup>2</sup> *Fair Work Act 2009* (legislation.gov.au)

# Modern Slavery Risks



ASC's central role in the Australian naval shipbuilding and sustainment supply chain provides the opportunity to influence and drive action to further identify and address modern slavery risks throughout the industry.

## Operations

The nature of ASC's work requires a highly skilled workforce. ASC's employees are located in Australia and perform a wide range of roles, including engineering, operations, program management, supply chain and corporate services.

ASC conducted a risk assessment in 2019-2020 for these roles and found them to be at low risk of modern slavery, in consideration of the company's mature human resource policies, systems and procedures. While this remains unchanged in 2021-2022, during the reporting period we implemented approaches to ensure we maintain compliance with our *Fair Work Act 2009* obligations.

## Supply Chain

The majority of ASC's direct, Tier 1 suppliers are located in Australia, with the remaining supply relationships located across Europe, North America and Asia.

The main supply categories include defence equipment; machinery; professional services; transport and logistics; and human resource and employment services.

In 2021-2022, ASC undertook a third modern slavery risk assessment of Tier 1 suppliers with which the company had an associated spend in the previous 12 months.

This process considered geographic and industry risk factors to identify suppliers with the greatest inherent modern slavery risks, using global country risk assessment sources. Key outcomes included:

- ASC has more than 1,200 Tier 1 suppliers in 15 countries, with over 90% in Australia.
- The majority have an inherent medium/low risk rating as they are mostly based in Australia, Europe and North America, areas with lower modern slavery risks.
- Suppliers with an inherent medium/low risk rating represented 57% of our total annual procurement expenditure.
- ASC established relationships with 292 new suppliers in 2021-2022, of which 14% were assessed to have an inherent medium/low risk rating.
- More than 95% (277) of these new suppliers are located in Australia, with the remainder spread across Europe, North America and Singapore.

## Supply Chain *continued*

### TIER 1 SUPPLIERS RISK ASSESSMENT 2021-2022: KEY POINTS

**Less than 2%**





of suppliers were assessed as high-risk. These businesses represent less than 1% of our procurement spend.





**95%**

of ASC's high-risk suppliers are located in Australia. This risk reflects the high inherent risk of the categories of goods and services provided.

**Top 10 suppliers**

by spend account for approximately 40% of total procurement spend. Five of these top suppliers were identified as medium-risk and have been prioritised for additional assessment and engagement in 2022-2023.

ALL SUPPLIERS		
INHERENT RISK CATEGORY	#	% OF SUPPLIERS
 High	19	2%
 Medium	474	38%
 Medium/low	742	60%
 Low	0	0%

NEW SUPPLIER SUBSET		
INHERENT RISK CATEGORY	#	% OF NEW SUPPLIERS
 High	1	1%
 Medium	119	41%
 Medium/low	172	58%
 Low	0	0%

While the inherent modern slavery risk is low for the majority of ASC's predominantly Australia-based Tier 1 suppliers, it can be high in the categories of goods and services they provide, either due to the industry they operate in, or their supply chains.

ASC acknowledges the need for effective controls to minimise the likelihood of contributing to exploitative practices through our business activities. We have commenced further assessment of suppliers who provide categories of goods and services with a higher inherent risk of modern slavery and will continue to work with them to identify and mitigate potential upstream risks.

The following table sets out our high-risk suppliers' procurement categories, the Tier 1 countries we source from and the likely indicators driving their risk rating.

CATEGORY OF GOODS AND SERVICES	TIER 1 SOURCING COUNTRIES	INDICATORS OF INHERENT RISK
Apparel and accessories, such as cotton bags and t-shirts, leather bags, and protective cases	Australia	There are high risks related to the apparel and textile manufacturing industry, including forced and child labour, and human trafficking. The sector's supply chain complexity reduces the visibility of issues within it, everywhere from animal and cotton farming to the weaving, dying and manufacturing of apparel. Cotton and leather are typically produced in areas with high modern slavery risks, like China and Brazil. These countries are associated with a high risk of forced labour. The apparel and textile industry is highly labour intensive, with disproportionate numbers of low-skilled and migrant workers who may not have the knowledge and/or bargaining power to speak up and demand their human rights be upheld. Low-skilled and migrant workers are frequently exposed to excessive working hours, underpayment and poor working conditions.
Electronic components, such as for the maintenance of equipment including marine lights, solar, batteries and switches	Australia	The electronics manufacturing industry has been linked with numerous instances of labour exploitation. These present throughout complex supply chains, making mitigation difficult – everywhere from the mining of raw minerals to the manufacture of finished products. The industry is at higher risk for forced labour and human trafficking throughout its supply chain, including the use of migrant labour, particularly in countries like China and Malaysia where electronics are largely produced.
Timber pallets and building products	Australia	The wood-based-products industry is at higher risk for forced labour and human trafficking. While Australian-grown timber is considered low-risk for modern slavery, finished-product supply chains carry risks further upstream. Production processes in countries with fewer industry regulations, or poor governance and implementation, elevate workers' risk of exposure to hazardous working conditions. The industry's seasonal nature and use of low-skilled migrant labour and subcontracting all increase modern slavery risk.
Healthcare supplies, such as protective equipment, including safety glasses	Australia	The healthcare supplies industry is at higher risk for forced labour and human trafficking. This risk has been exacerbated due to increased demand for personal protective equipment as a result of the COVID-19 pandemic. While ASC's suppliers are Australia-based, modern slavery risks may be found in their products' manufacture. Factors such as complex and/or opaque supply chains, frequent use of migrant labour and exploitative work practices, such as excessive overtime, all increase modern slavery risk.
IT consulting and other services	Singapore	IT consulting and other services are at higher risk for forced labour. This risk is exacerbated when services are subcontracted to providers in locations with lower labour standards and costs. This may pose challenges in monitoring workforce management and potential higher-risk practices, such as further outsourcing or labour hire.
Food product distribution	Australia	Food distribution services are likely to rely on an indirect employment model, such as labour hire, contracting or subcontracting. This minimises visibility of workforce exposure to business and operational risk. Food processing has been recognised as a dangerous job, with a high risk of accidents, injuries and illness, leading to dangerous working conditions. At a broader level, the food and agriculture industry has been linked to child labour and forced labour exploitation in countries where these industries operate. Other factors, such as seasonal work practices, long hours and frequent use of unskilled and migrant labour, also add significant risk.

# Modern Slavery Due Diligence and Risk Management

ASC seeks to raise its suppliers' understanding of modern slavery and identify any high-level risks. The MSWG continuously reviews the actions in ASC's Modern Slavery Three-Year Risk Management Implementation Plan to ensure we are enabling a deeper understanding and examination of risks within our supply chain, and maintaining relevance as we progress our commitments.

## Managing Operational Risks

ASC's operational activities were assessed as having an inherently lower risk of modern slavery, within the context of Australia and the company's human resource systems and controls. In 2021-2022, we focused our efforts on implementing the following controls to maintain compliance with labour requirements and understand modern slavery risks.

### Enterprise Bargaining Agreement (EBA)

ASC negotiates four EBAs with our workforce every three years. In 2021-2022, we ratified agreements for three of these: Staff Agreement – Western Australia; Team Lead Agreement – South Australia; and Team Lead Agreement – Western Australia. All three were operational as of 30 June 2022.

The EBAs cover approximately 30% of ASC's total permanent workforce. We also engage trade labour hire providers and mitigate any risk by negotiating these contracts on the same principles as agreed within the relevant ASC EBA.

### External Remuneration Review

ASC's HRRC is responsible for undertaking annual reviews of our remuneration policy and strategy, which covers approximately 69% of our salaried employees. As part of this process, salary bands were benchmarked against market data during the reporting period, with adjustments made to address any inequities.

### Training

Introductory human rights training is mandatory for all ASC employees, and modern slavery training is mandatory for those in roles that have regular touchpoints with potential human rights risks throughout our supply chains.

## Managing Supply Chain Risks

### Supply Chain Risk Identification and Assessment

In 2021-2022, ASC continued to focus on assessing and addressing modern slavery risks in its supply chain. We implemented due diligence and remediation procedures to support high-risk suppliers in taking action to mitigate relevant risks.

ASC engaged an independent consultant to conduct its third annual modern slavery risk assessment, identifying inherent risks with Tier 1 suppliers. The assessment considered three key indicators: country, industry factors and industry controversy.

Country risk ratings were established through an analysis of human rights databases, indices and reports from internationally recognised bodies,

including the Global Rights Index, international labour organisations and the World Bank. Modern slavery industry risk ratings were established by analysing labour intensity, skill level, the presence of opaque intermediaries, industry regulation levels, the presence of migrant labour and known modern slavery violations.

An inherent modern slavery risk score was then calculated for each Tier 1 supplier for all forms of modern slavery, including forced labour, child labour, forced marriage and human trafficking.

### Supply Chain Risk Mitigation

In 2021-2022, we continued engaging with Tier 1 ASC suppliers identified as being at high risk of engaging in modern slavery, to further understand their modern slavery risk. This included assessing each supplier's inherent risk rating in detail and evaluating their responses to our Modern Slavery Questionnaire.

Three suppliers required follow-up actions. These actions included raising the suppliers' awareness of modern slavery risks – both internally and in their supply chains – and discussing their management of them. All actions were completed in the period.

ASC also engaged a third-party consultant to expand its supply chain risk assessment beyond Tier 1 suppliers. We will continue to work with the consultant on this in 2022-2023.

# Modern Slavery Due Diligence and Risk Management *continued*

## Remediation

ASC has embedded grievance mechanisms and whistleblower protection processes available to its workforce and suppliers, enabling them to confidently raise concerns relating to incidents of modern slavery, human trafficking or human rights issues.

The Whistleblower Protection Process outlines how to report a business conduct concern, what happens when a report is made, and how we protect the reporter.

We do not tolerate any form of retaliation against anyone for reporting a business-conduct concern. This process is publicly available on ASC's website.

We are committed to investigating all reported instances of actual or suspected modern slavery. Where an investigation confirms the presence of modern slavery in our supply chain or operations, we will initiate remediation steps detailed in our modern slavery process.

ASC encourages all its employees, contractors and suppliers to report concerns where ASC values and codes of conduct are not followed. No such incidents were reported in 2021-2022.



# Monitoring Performance and Reporting

The MSWG governs the implementation of ASC's modern slavery compliance framework and monitors progress against its Modern Slavery Three-Year Risk Management Implementation Plan. The MSWG is also responsible for providing the ASC Board with updates on the progress of our modern slavery program.

The group's primary objectives over the reporting period were to develop ASC's Modern Slavery Three-Year Risk Management Implementation Plan for 2023-2025; update ASC's Supplier Code of Conduct and procurement templates in line with the company's current modern slavery risk management practices; expand supply chain risk assessment beyond Tier 1 suppliers; and implement and establish ongoing monitoring of ASC's modern slavery KPIs. Effectiveness in these areas is measured through the following mechanisms:

EFFECTIVENESS MECHANISM	ACTIVITY COMPLETED IN 2021-2022
<b>Monitoring compliance with policies and procedures</b>	<ul style="list-style-type: none"> <li>Updated ASC's Supplier Code of Conduct and procurement templates in line with ASC's current modern slavery risk management practices.</li> </ul>
<b>Internal reporting on compliance and progress</b>	<ul style="list-style-type: none"> <li>Implemented and established ongoing monitoring of ASC's modern slavery KPIs.</li> <li>Completed an annual risk review of Tier 1 suppliers in accordance with ASC's modern slavery risk framework.</li> <li>Engaged a third party to expand supply chain risk assessment beyond Tier 1 suppliers.</li> <li>Implemented awareness raising activities with high-risk suppliers identified in the last reporting period.</li> </ul>
<b>Review and revision of approach to support continuous improvement</b>	<ul style="list-style-type: none"> <li>Completed Modern Slavery Three-Year Risk Management Implementation Plan for 2023-2025.</li> </ul>

To measure the impact of our due diligence approach, we identified a set of modern slavery KPIs to track our effectiveness in identifying and managing risks. The table below outlines our 2021-2022 performance against these indicators.

ASC MODERN SLAVERY KPIs	TARGET	2021-2022 STATUS
<b>Reporting:</b> Percentage of new supplier qualifications assessed against modern slavery criteria	100%	100%
<b>Policy and Governance:</b> Milestones completed in accordance with Modern Slavery Three-Year Risk Management Implementation Plan	100%	100%
<b>Policy and Governance:</b> Supplier Relationship Management (SRM) Plans that include consideration for modern slavery risk mitigation in supplier operations and supply chains	100%	100%
<b>Risk:</b> Mitigation plans approved and implemented for suppliers identified as high-risk for modern slavery	100%	100%



# Looking Ahead: 2022-2023

Since launching our modern slavery program, ASC has been committed to continuous learning and program-design innovation, to mitigate and address the risks of modern slavery in our supply chain.

In 2022-2023, we will continue to strengthen our approach to identifying, mitigating and remediating risks.

To do this, we have set the following strategic priorities:

- Continue to expand supply chain risk assessment beyond Tier 1 suppliers.
- Review opportunities to share knowledge, such as through industry partnerships and membership of the UN Global Compact – Modern Slavery Community of Practice.
- Further develop action plans to address high modern slavery risks and ensure a consistent approach.
- Monitor media to identify and mitigate potential supply chain risk.



# Appendix

ASC prepared this Modern Slavery Statement 2022 in accordance with the mandatory criteria listed in s. 16(1) of the Act. The table below lists these criteria and the sections in our statement that address each.

REFERENCE	AUSTRALIAN MODERN SLAVERY ACT 2018 MANDATORY REPORTING REQUIREMENT	LOCATION OF INFORMATION
<b>s. 16(1)(a)</b>	Identify the reporting entity.	Page 3 – About our Statement
<b>s. 16(1)(b)</b>	Describe the structure, operations, and supply chains of the reporting entity.	Page 3 – About ASC
<b>s. 16(1)(c)</b>	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls.	Page 9 – Modern Slavery Risks
<b>s. 16(1)(d)</b>	Describe the actions taken by the reporting entity, and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes.	Page 5 – Policies and Governance Page 12 – Modern Slavery Due Diligence and Risk Management
<b>s. 16(1)(e)</b>	Describe how the reporting entity assesses the effectiveness of such actions.	Page 14 – Monitoring Performance and Reporting
<b>s. 16(1)(f)</b>	Describe the process of consultation with: i) any entities that the reporting entity owns or controls; and ii) in the case of a reporting entity covered by a statement under section 14 – the entity giving the statement.	Page 3 – About our Statement
<b>s. 16(1)(g)</b>	Include any other information that the reporting entity, or the entity giving the statement, considers relevant.	Page 15 – Looking Ahead: 2022-2023



**ASC Pty Ltd**

ACN 008 605 034

Registered and Head Office  
694 Mersey Road, Osborne  
South Australia 5017

**T** +61 8 348 7000

**F** +61 8 348 7001

**W** [asc.com.au](http://asc.com.au)

Find and follow us on:  
Facebook - LinkedIn - Instagram - YouTube

