



Modern Slavery Statement

Development Victoria

6 December 2023



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CRITERION ONE

IDENTIFICATION OF THE REPORTING ENTITY

The reporting entity for this Modern Slavery Statement is Development Victoria (ABN 61 868 774 623) which is a statutory public non-financial corporation incorporated on 1 April 2017 under the *Development Victoria Act 2003 (Vic)*. Development Victoria's registered office is Level 9, 8 Exhibition Street Melbourne.

This is Development Victoria's fourth Modern Slavery Statement under the Modern Slavery Act 2018 (Cth) and sets out the actions taken to assess and address modern slavery risks in Development Victoria's operations and supply chains. This document is for the 2022-23 Financial Year (the Reporting Period). This statement has been approved by the Board of Development Victoria on 6 December 2023. The Board of Development Victoria has authorised the Chairperson of the Board to sign this statement on its behalf.



Megan Haas
Chairperson of the Board, Development Victoria

Date: 6 December 2023

CRITERION TWO

STRUCTURE, OPERATIONS AND SUPPLY CHAINS OF DEVELOPMENT VICTORIA

About Development Victoria

At Development Victoria, we create places for people.

We're a government agency partnering with industry and communities to transform ambitious ideas into reality.

We balance community needs with commercial discipline – and our experience shows that sustainable, liveable places deliver the best long-term return for all.

We reimagine iconic places like the Melbourne Arts Precinct and State Basketball Centre to transform them for future generations.

We develop entire precincts like Docklands and Fitzroy Gasworks, unlocking public land to create connected, sustainable places where people can live, work play and thrive.

We build homes close to jobs, services and transport – and we sell them to Victorians on average incomes, so they too can have the security of a place to call home.

Together, we deliver places that make a genuine difference to the people of Victoria.

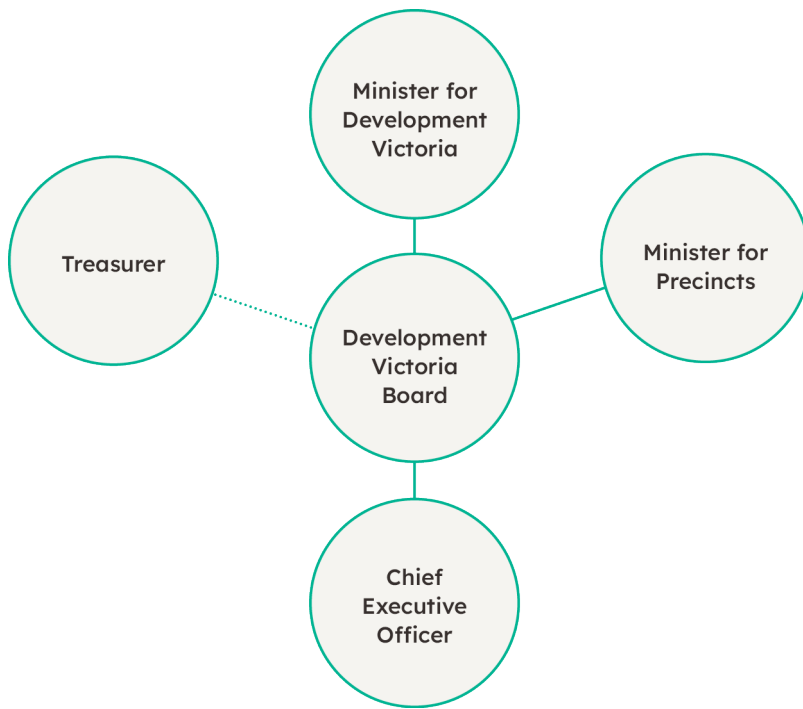
Structure

Development Victoria is a statutory authority governed by a Board of Directors (the Board) with the role and function of the Board established under the *Development Victoria Act 2003* (Vic) (the DV Act).

The Board has responsibility for strategic oversight of the organisation and considers projects presented by Management for approval, before they are presented to the Minister, currently the Victorian Minister for Development Victoria.

Under the DV Act, Development Victoria is subject to the general direction and control of the Minister, including any specific directions given by the Minister with the approval of the Treasurer and/or Minister for Precincts.

Development Victoria is a Public Non-Financial Corporation (PNFC) operating in accordance with guidelines established by the Department of Treasury and Finance.



Operations

Development Victoria was established on 1 April 2017 and operates under the DV Act. The functions of the organisation set out in the Act include:

- Carrying out property development and social and economic capital works projects in accordance with government policies and strategies
- Providing advisory services
- Developing declared projects

The Act requires Development Victoria to carry out its functions using commercial disciplines.

Development Victoria also has powers under the *Docklands Act 1991*.

Development Victoria's operations are primarily conducted in Victoria and it does not operate any global or offshore operations. More specifically, Development Victoria's operations include:

- managing and advising on property development including government declared projects;
- revitalising land and buildings;
- developing healthy and affordable housing;
- enhancing environments that enrich communities in the areas Development Victoria works in;
- providing opportunities for struggling Victorians to get onto the property ladder; and
- offering an advisory service for other government agencies to support social and economic capital works projects.

All of Development Victoria's operations are guided by five policy pillars as detailed below.



In conducting these operations, Development Victoria employs approximately 340 staff and engages specialist construction service project managers and consultants on a contract by contract basis.

The majority of personnel work under a hybrid model working both remotely and based at Development Victoria's head office of Level 9, 8 Exhibition Street Melbourne with a number of personnel at other site offices across Melbourne or totally working remotely.

To deliver on these policy pillars and the objectives of the DV Act, Development Victoria's operations include:

- direct employment of personnel to deliver projects and provide support services;
- direct engagement of contractors and construction services consultants, including through entering into long term development agreements, to support the delivery of projects and provide specialist services and advice;
- direct engagement of construction contractors to deliver project works;
- procurement, divestment and retention of real estate assets;
- leasing of property; and
- purchasing of goods and services including ICT, office equipment, stationery and staff amenities.

As part of its operations, Development Victoria holds interests from time to time in unincorporated joint ventures. To the extent that Development Victoria is able to direct the activities of those joint ventures, Development Victoria requires the joint venture to comply with its policies and procedures. Development Victoria may be the beneficiary under, or control trusts established for the purpose of implementing Development Victoria's objects and functions and those trusts would undertake a limited range of activities related to holding property.

Supply Chain

During the Reporting Period, Development Victoria entered into approximately 730 contracts with predominately Australian suppliers in the following procurement categories:

- Head contractor (management and delivery of construction works);
- Building contractor (construction works);
- Architectural services;
- Civil contractor (construction works);
- Real estate agency services;
- Design services;
- Consultancy services (non-specific consultancy or multi-disciplinary practice);
- Legal services;
- Quantity surveyor services;
- Maintenance services;
- Marketing and communications services;
- Utility providers;
- ICT services (telecommunications, software, hardware and hosting services);
- Printing, copying and stationary (office supplies);
- Probity advisory services;
- Project management construction services;
- Travel;
- Traditional Owner engagement;
- Professional memberships;
- Transportation; and
- Catering.

Development Victoria's supply chain also includes subcontractors, subconsultants and suppliers of goods and services to Development Victoria's contractors and consultants which can be several levels below the entity directly engaged by Development Victoria.

In addition, Development Victoria obtains services from other government departments/agencies, statutory authorities and statutory corporations such as utility providers.

No significant contracts were let to offshore suppliers during the Report Period.

Arrangements with Suppliers

As a statutory authority, Development Victoria complies with Victorian government policies in relation to the procurement of suppliers. These include:

- Ministerial Directions for Public Construction Procurement in Victoria;
- Local Jobs First Policy;
- Social Procurement Framework;
- Building Equality Policy;
- Fair Jobs Code and
- Whole of Government requirements in relation to probity.

These policies include a range of measures that mitigate the risk of modern slavery. For example, the Local Jobs First Policy requires suppliers to report on the Australian and New Zealand (local) component of all materials and labour used in projects above a specified value threshold and encourages suppliers to source locally wherever possible. Locally produced construction materials and services have a low risk of modern slavery.

The Fair Jobs Code requires suppliers for larger contracts to hold a Pre-Assessment Certificate. This requires them to demonstrate that they comply with existing industrial relations and workplace health and safety laws which prohibit modern slavery practices.

Suppliers are generally procured on a contract by contract basis and sourced via:

- direct selection for low value contracts;
- limited tender (three or more written quotes) for mid value contracts; or
- open tender or selection from approved government and agency pre-qualification registers for high value contracts.

These contracts include short term service provision through to major design and construction projects that run for several years.

CRITERION THREE

RISKS OF MODERN SLAVERY PRACTICES IN THE OPERATIONS AND SUPPLY CHAINS

Development Victoria's Operations

Development Victoria directly employs all staff and engages a number of contracted resources in its operations. Employees up to and including Level 5 are employed in accordance with a negotiated Enterprise Agreement. Senior employees (Director level and above) are engaged under individually negotiated contracts that are fair to both parties. Contracted resources such as construction service providers and specialist project managers are directly engaged under Development Victoria's Minor Services Agreement or Supplier Panel Agreements at agreed market rates.

Staff and some contracted resources are provided with flexible working arrangements and can work at Development Victoria's head office, a project site office or remotely. They also have the ability to nominate when they will be available to work subject to management approval and operational requirements.

As Development Victoria does not subcontract its workforce through labour hire or other arrangements, it considers its operations to have a negligible risk of modern slavery.

Development Victoria's Supply Chain

Development Victoria's operations are focused on the construction industry which, according to the Human Rights Commission, has inherent risks of modern slavery practices.¹ These risks have been identified and are mitigated through Development Victoria's procurement practices as well as compliance with Victorian government policy.

¹ See <https://humanrights.gov.au/our-work/rights-and-freedoms/publications/property-construction-and-modern-slavery-2020>

In particular, the Local Jobs First policy requires suppliers to source as much locally produced materials as possible and to report on the percentage of local materials used in construction. For larger projects (valued at over \$50 million), the percentage of local materials used must meet or exceed the threshold set by the Minister for Jobs and Industry which is a minimum of 90%. These local content requirements minimise the amount of imported materials which could be produced under modern slavery conditions.

The Local Jobs First policy also maximised the amount of local labour used in projects which mitigates the risk of modern slavery by significantly limiting opportunities for offshoring labour.

The risk of any modern slavery occurring at the DV site is negligible as sites are generally managed by head contractors who are contractually bound to fully comply with industrial relations and work health safety requirements. In addition, many of Development Victoria's sites are unionised which ensures that workers are treated fairly and receive their entitlements effectively mitigating any risk of modern slavery at a Development Victoria worksite.

Nevertheless, residual risks may be present at lower tiers of the supply chain where Development Victoria has limited oversight of work practices or where work is carried out off-site or overseas.

Supply Chain Risk Assessment Outcomes

Development Victoria conducts ongoing in-depth modern slavery risk assessments of the various categories of procurement within its supply chain to identify potential areas of risk of modern slavery in accordance with the steps set out in Criterion Four.

Our risk assessment is based on a methodology which includes Development Victoria considering a number of indicators of modern slavery risks including sector and industry, the type of products and services, geographical location and specific entity risk, for each of the supply categories that Development Victoria identified in its supply chain as described in Criterion Two. The methodology for the analysis is set out in the Supply Chain Risk Assessment section in Criterion Four.

Based on these assessments; Development Victoria is confident that it is not a direct cause of any modern slavery risk. We consider that the risk of modern slavery in most of the procurement categories identified in our supply chain are negligible or low. We have identified that there is a potential for the risk of modern slavery in our supply chains with several suppliers of Building and Construction works.

Potential risks may occur in very limited situations where work or material manufacturing is carried out offsite or overseas. These risks may include:

- the use of trafficked or indentured low skilled or agency/labour hire workers
- child labour used in the manufacture of imported products such as bricks, cement, steel or timber;
- materials manufactured by offshore workers who are denied basic freedoms or minimum wages; and
- migrant or otherwise disadvantaged workers forced to work excessive hour or in dangerous conditions under the threat of deportation or other consequence.

This information is set out in the Risk Profile Table below.

Risk Profile Table

| Risk | Description of Risk |
|--------------------------|--|
| Sector / Industry | <p>We have identified a number of sectors and industries relevant to our operations and supply chains that may have a higher potential for modern slavery risks because of their characteristics, products and processes. These characteristics include the use of unskilled or temporary labour, use of employment agencies, outsourcing or contract workers potential use of foreign workers, offshore manufacturing and long, complex supply chains.</p> <p>These sectors include offshore building and construction, civil contractors, maintenance and ICT services industries.</p> |
| Product / Service | <p>We have identified a number of products and services within our supply chains that may have a higher potential for modern slavery risks due to the way in which those products are produced, provided or used. These characteristics include products or services being used or sourced where market competition and cost requirements or delivery timeframes may require suppliers to engage in excessive working hours, make cost savings on labour hire or rapidly increase the labour force.</p> <p>These products and services are associated with the building and construction, civil contractors, and maintenance and ICT services industries.</p> |
| Geographic | <p>We have identified a number of countries or regions within our supply chains that may have a higher potential for modern slavery risks due low modern slavery protections or where labour/materials are not appropriately identified; where products manufactured or sourced from countries with no modern slavery protections with a high vulnerability to Modern Slavery or where the source of labour / materials is not identified; or potential for services sourced from countries with an identified vulnerability to Modern Slavery.</p> <p>Considering the characteristics detailed above, some sectors within our supply chain may be at risk of modern slavery with products or services sourced from India, Indonesia, China or other south-east Asian countries with a moderate vulnerability to Modern Slavery.</p> |
| Specific Entity | <p>Our risk assessment has not identified any specific supply chain risks associated with a particular company or business due to their poor human rights and / or labour practices record, poor governance structures and a lack of robust policies and / or responsible purchasing practices.</p> |

CRITERION FOUR

ACTIONS TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS INCLUDING DUE DILIGENCE AND REMEDIATION PROCESSES

The actions below were designed to assess and address the potential for Development Victoria to cause, contribute to, or be directly linked to modern slavery through its operations and supply chain.

Development Victoria has undertaken a broad range of activities to assess and address modern slavery risks in its operations and supply chains. These include:

- business engagement activities to obtain buy-in and support from all of Development Victoria's operations;
- a comprehensive risk analysis of Development Victoria's activities with a focus on where Development Victoria can most influence its supply chain;
- development of a comprehensive questionnaire issued to key suppliers and business partners;
- development, publication and communication of Development Victoria's Modern Slavery Policy;
- inclusion of modern slavery compliance requirements in tender documentation;
- inclusion of modern slavery compliance and reporting obligations in all standard form contracts;
- annual staff training on what constitutes modern slavery as well as how to recognise modern slavery risks;
- focus groups with contract managers to workshop strategies to identify and support suppliers and business partners to proactively take steps to mitigate modern slavery risks;
- inclusion of a questionnaire as part of onboarding potentially at-risk construction suppliers to identify their approach to modern slavery;
- provision of training and support to contract managers to assist them to work with suppliers and business partners to address potential modern slavery risks and
- documented staff procedures on steps to take if the risk of modern slavery is identified or suspected.

Further details of these activities are set out below.

The Director, Procurement Strategy & Compliance has operational responsibility for developing and implementing Development Victoria's modern slavery risk mitigation activities with oversight from the Group Head, Legal, and Advisory and the Executive Team.

The relevant proposal manager and contract manager for each procurement has responsibility for checking that a supplier agrees to comply with Development Victoria's Modern Slavery Policy as well as alerting an Executive Team member if a modern slavery risk is identified or suspected.

An Executive Team member in consultation with the Group Head, Legal and Advisory will determine what actions should be taken to respond to and remediate any identified or potential modern slavery risks.

Business Engagement Activities

Development Victoria has a Procurement Working Group which includes representatives from each division of its operations. The scope of the Procurement Working Group includes providing assistance with respect to Development Victoria's approach to the assessment and management of the risks of modern slavery. The Procurement Working Group was involved in the preparation and endorsement of Development Victoria's ongoing modern slavery risk assessment programme including strategies for mitigating the risk of modern slavery in the supply chain as well as the specific onboarding supplier questionnaire. Group members are also encouraged to share information about modern slavery with their divisions as well as to alert the rest of the Procurement Working Group to any issues and risks.

The Development Victoria Executive Team was briefed on the ongoing modern slavery compliance activities.

Development Victoria's Board has also been regularly updated on the modern slavery compliance activities including key milestones of action items.

Supply Chain Risk Assessment

Development Victoria has conducted a modern slavery risk assessment of the various categories of procurement within its supply chain with ongoing monitoring to address any changes to the risk profile.

In the initial consideration of Development Victoria's supply chain, it was decided to exclude the other government departments/agencies and statutory corporations as they were considered low risk and suppliers below a particular dollar threshold were excluded. These entities form part of Development Victoria's supply chain but have been excluded from further analysis as they are considered to be of low risk in terms of modern slavery.

Procurement categories where few low value contracts were let have also been excluded from the analysis as Development Victoria has little to no influence over these suppliers.

Step One – Risk Assessment

As noted above in Criterion Three, Development Victoria undertook a risk assessment to identify any key modern slavery risks that existed within our operations and supply chains.

We then prioritised those key risk business and supply relationships in accordance with steps two and three below, based on where we had the greatest leverage to mitigate the potential modern slavery risks that existed in the relationship.

Step Two – Opportunity Assessment

Development Victoria conducted a comprehensive Modern Slavery Supplier Chain Risk Assessment commencing with an Opportunity Assessment undertaken to determine the category of suppliers where Development Victoria is likely to have the most influence. The Opportunity Assessment identified four categories of suppliers being:

- High value suppliers who comprise the top suppliers by expenditure;
- Strategic Relationships where a supplier provided specialist or strategically important goods/services and where there is a long-standing relationship evidenced by the number of contracts let;
- Key Customers where the level of the supplier's revenue is a significant portion of the supplier's overall revenue which is captured in the analysis of high value suppliers; or
- a supplier of High Potential where forecast expenditure could potentially be of a level that would see the supplier reclassified to one of high value.

Of these categories, High Potential suppliers are unable to be identified as contracts are awarded through a competitive tender process rather than being based on existing relationships.

Step Three – Identification of Key Suppliers

A report was generated from Development Victoria's Project Management Information System (PIMS) to list all suppliers with active or ongoing contracts approved from 1 February 2019 to 31 January 2021. The supplier's ABN was used as the unique identifier to avoid duplications. Historical (imported) and revenue contracts were excluded. This identified 1080 suppliers and business partners, excluding other government agencies and statutory authorities. The majority of these suppliers were excluded from the Opportunity Assessment as they were either engaged on a single contract or low value basis.

The top 50 suppliers in terms of number of contracts let or value of contracts were used to identify industries and categories of goods and services procured. A risk analysis was conducted for each of the categories based on sector and industry risks, product and services risks, geographic risk and specific entity risks. Each category was assigned a risk rating ranging from medium through to negligible. No high-risk categories were identified.

The key suppliers were selected from categories where the risk rating was medium or low with the opportunity assessment used to determine where Development Victoria was in a position to have the most influence.

As part of the ongoing monitoring, any new suppliers of construction works or service were identified with a questionnaire distributed to suppliers where the contract let exceeds \$3 million. Responses to the questionnaire were assessed by subject matter experts in the Procurement Team to determine if further investigation is required. There were no significant risks identified during the reporting period.

Step Four – Development of Supplier Questionnaire

A comprehensive supplier questionnaire was developed in the previous reporting period in consultation with Development Victoria's external legal advisors, the Procurement Working Group and the General Counsel and subsequently endorsed by the Executive Director, Legal, Risk and Compliance during the previous reporting periods. The questionnaire required suppliers to provide details regarding their:

- corporate structure;
- workforce and labour hire arrangements;
- supply chain;
- steps they have undertaken to address modern slavery including providing copies of their policies and procedures where applicable; and
- approach to governance and compliance monitoring.

This questionnaire was signed by the Executive Director, Legal, Risk and Compliance and sent to identified key suppliers excluding key suppliers who had submitted a response during the previous reporting period.

The findings from the data return analysis informed our assessment and is summarised in the Supply Chain Risk Assessment Outcomes section in Criterion Three.

Given the low risk profile of Development Victoria's supply chain, an alternative approach was implemented during the reporting period.

The area where there is a potential risk of modern slavery is with construction contractors where there is a modern slavery risk with materials sourced from offshore. As Development Victoria does not have direct control over these suppliers, a simplified questionnaire was developed for suppliers during the onboarding process to assess their understanding and processes for addressing modern slavery risks. If Development Victoria identifies that they either have a lack of robust policies and processes or the supplier does not demonstrate a good understanding of modern slavery risks, Development Victoria will, as appropriate, work with the suppliers to improve their level of compliance.

This simplified questionnaire will be required from any new construction works suppliers that are let a contract over a nominal value and commenced during the subsequent reporting period.

Development Victoria's Modern Slavery Policy

Development Victoria's Modern Slavery Policy was developed in consultation with its external legal advisors, the Procurement Working Group, Executive Team and Development Victoria's General Counsel. The Modern Slavery Policy sets out the responsibilities of Development Victoria, its employees, suppliers, business partners and development partners in observing and upholding Development Victoria's position on Modern Slavery. The Modern Slavery Policy was published on Development Victoria's website and is publicly accessible at https://www.development.vic.gov.au/about/policies-and-disclosures?page=modern_slavery_policy.

The Modern Slavery Policy was reviewed during the reporting period with minor updates made.

Tender Documentation and Standard Form Contracts

Development Victoria's tender documentation was updated to include a section on modern slavery which provides information to bidders as well as directing them to Development Victoria's Modern Slavery Policy. As part of their conforming submission, bidders must declare that they have read, understood and will comply with Development Victoria's Modern Slavery Policy.

Development Victoria's approved standard form contracts (including any whole of government contracts issued by Development Victoria) were reviewed and amended to include modern slavery clauses. These clauses require suppliers to comply with all modern slavery legislation and upon request, provide reports with data to enable Development Victoria to comply with modern slavery legislation.

The amendments to the tender documents and standard form contracts were approved by the Director Procurement Strategy and Compliance.

Contracts and tender documentation were reviewed during the reporting period and no substantial changes to the modern slavery clauses were required,

Staff Training

During the initial reporting period, all Development Victoria staff were required to participate in a program of training designed to raise awareness of modern slavery risks in the organisation's supply chain and the construction industry in general. This training also covered Development Victoria's Modern Slavery Policy and steps to be taken if modern slavery risks are identified or suspected. A training module was recorded and made accessible in Development Victoria's Learning and Development Teams pages along with virtual face to face training provided to staff at regular team meetings

Additional Modern Slavery training refresher sessions were provided with staff to raise awareness on how to identify potential Modern Slavery risks and the required actions to be undertaken in such instances. Refresher sessions have been prepared in the Development Victoria e-learning platform and were piloted with select groups during the reporting period. Commencing from the subsequent reporting period, all staff will need to complete the e-Learning module and competency assessment on an annual basis.

The Development Victoria Procurement Team are the operational subject matter experts in modern slavery compliance and provide guidance to staff and the Executive Team in the unlikely event that a modern slavery risk is identified and requires management.

Modern Slavery Procedure

A copy of Development Victoria's Modern Slavery Policy and staff procedure is published on Development Victoria's intranet and is accessible to all staff and contracted personnel. The procedure was established to guide staff in their management of modern slavery risks and requires staff to:

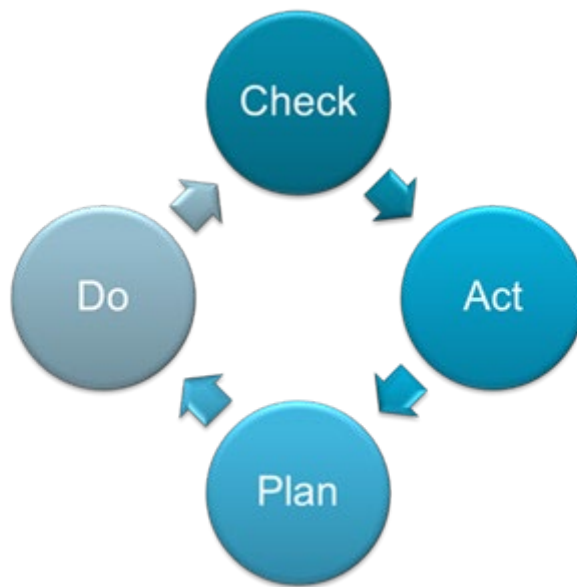
- ensure Development Victoria’s Modern Slavery Policy and requirements are communicated to all suppliers either through the tender process or by completing a supplier declaration;
- raise any genuine grievance with respect to modern slavery matters in Development Victoria’s operations with an Executive Team member;
- raise any suspected or identified modern slavery concerns with a supplier with an Executive Team member or the General Counsel; and
- proactively take steps to identify any risk of modern slavery within Development Victoria’s supply chain but not take action unless authorised by the Executive or the Executive Director Legal, Risk and Compliance.

The Modern Slavery Procedure was reviewed during the reporting period with no significant changes required.

CRITERION FIVE

DEVELOPMENT VICTORIA'S EFFECTIVENESS OF ACTIONS BEING TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

Development Victoria intends to continuously assess the effectiveness of the actions undertaken to address the risk of modern slavery in its operations and supply chains using the 'Plan, Do, Check, Act' approach to promote the Organisation's continuous improvement.



The steps are as follows:

Plan

Undertaken during the Reporting Period where Development Victoria assessed the requirements to address modern slavery and developed its approach.

Do

Undertaken during the Reporting Period whereby Development Victoria conducted a risk assessment of its operations and supply chains, provided ongoing staff training and undertook other activities detailed under Criterion Four of this Statement.

Check

This phase commenced at the conclusion of the Reporting Period to assess the effectiveness of the activities undertaken.

The Procurement Working Group consulted with personnel responsible for conducting procurements to determine the effectiveness of the training activities, assess gaps and, where appropriate, provide recommendations for additional training and support. No additional recommendations were made during the reporting period as the current activities were determined to be effective.

All Development Victoria's policies and procedures were reviewed during the current reporting period i.e. financial year 2022/23.

Act

This phase is ongoing and incorporates activities to further reduce the risk of modern slavery within Development Victoria's operations and supply chains. The extent and specifics of these activities are guided by the outcomes of the Check phase (above) but may be expanded to include the following:

- working with suppliers and the Industry Capability Network to encourage the sourcing of locally manufactured products with an inherent low to negligible risk of modern slavery;
- providing additional training to senior staff (Leadership Teams) to empower them to work with key suppliers to address modern slavery risks;
- providing refresher training to staff focusing on risks identified in the supply chain;
- conducting internal compliance check to confirm that staff understand the policy and procedures and are applying these principles when conducting procurements;
- ongoing review of procurements to identify if contracts are awarded to high risk suppliers;
- continual review of Development Victoria's Modern Slavery Policy or staff procedures; and
- assessment of systems to assist staff to identify potential risks of modern slavery when sourcing suppliers.

CRITERION SIX

DESCRIBE THE PROCESS CONSULTATION WITH ANY ENTITIES THE REPORTING ENTITY OWNS OR CONTROLS

Development Victoria's approach to consultation across its operations is described in Criterion Four above. This included the involvement of Development Victoria's Procurement Working Group which has representatives from each division of its operations. On an ongoing basis, Development Victoria will consider the extent to which further consultation is required with any entity that it owns or controls to assess and address the risks of modern slavery in their operations and supply chains.

CRITERION SEVEN

ANY OTHER RELEVANT INFORMATION

Development Victoria's Procurement Working Group meets on a monthly basis and will determine the activities to be undertaken in relation to the organisation's continuous improvements for assessing and reporting potential Modern Slavery risks. This will include considering the actions identified as part of Criterion Five above.

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