

Newcastle Permanent Building Society Limited

Modern Slavery Statement

Under the *Modern Slavery Act 2018* (Cth)

Reporting period: 1 July 2021 – 30 June 2022

Message from the CEO

Here at Newcastle Permanent our purpose is trusted banking and we show this through safeguarding the success and wellbeing of our customers, our people and our community.

As one of Australia's leading customer-owned financial institutions we have a responsibility to lead by example on important social issues. We strive to conduct our business responsibly and ethically to ensure we protect the human rights of those we employ directly and those whose employment we support through our supply chain.

In what has been a challenging economic year, our focus has remained firm on enhancing the review, analysis and assessment of our operations, investments and supply base.

We've seized opportunities identified last financial year and strengthened our commitment to mitigating modern slavery risks within our footprint. We've implemented new training programs, new policies, commenced working groups and collaborated with industry to support our maturing response to modern slavery.

This modern slavery statement reflects our progress to date and highlights our commitment to our obligations as we continue to evolve to support the rights of decent work for all.



Bernadette Inglis
Chief Executive Officer

This statement was approved by the Board of Newcastle Permanent Building Society



Jeffrey Eather
Chair

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PART ONE – Mandatory Reporting Requirements under the Act

1. Newcastle Permanent Building Society Limited (“**Newcastle Permanent**”) is proud to lodge our third consecutive Modern Slavery Statement, reporting on our continued action to identify and respond to the risks of modern slavery in our operations and supply chains in accordance with the *Modern Slavery Act 2018* (Cth) (the Act).

Who we are

2. The mandatory reporting entity is Newcastle Permanent Building Society Limited – ABN 96 087 651 992.
3. Newcastle Permanent owns or controls the following associated entities, which are consolidated into the group for annual accounting, reporting and auditing purposes. These associated entities are:
 - Newcastle Permanent Community Foundation Company Limited – ABN 26 589 812 647
 - Newcastle Permanent Charitable Foundation
 - Newcastle Permanent Funding Trust No.1
4. None of these associated entities meets the statutory revenue threshold to be considered individual reporting entities under the Act. However, we have continued the approach developed in prior reporting periods, of including the procurement data of these entities in our risk assessments undertaken (further detailed below at Part Two). This has enabled Newcastle Permanent to tailor an overall response that accounts for the entirety of the group risk. We have also continued to communicate our ongoing measures to all associated entities.
5. At Newcastle Permanent our core values underpin everything we do, including our approach to modern slavery:
 - We are here for our customers
 - We strive to act responsibly and ethically
 - We strive to be a sustainably responsible organisation
 - We are focused on operating in an ethical manner that builds trusted relationships
 - We work to support our customers and local communities in building towards the future
6. Our maturing response to modern slavery, and our broader ESG approach, has continued to evolve to ensure it continues to align with expectations from our people, our customers, the community, and relevant regulatory requirements or practices.

Our structure and operations

7. Newcastle Permanent is a member-owned mutual building society and public company. We are owned by, and reinvest profits for the benefit of, our customers. The centrality of our customers and relationship with our local and regional communities is a vital part of who we are.
8. As a mutual building society, Newcastle Permanent’s core operations revolve around our provision of various personal and business financial services including:

Personal Finance and Retail Banking Products

- Transaction Accounts
- Savings and Investment Accounts
- Personal Loans
- Home Loans
- Visa Credit Cards and Debit Cards
- Home Insurance
- Car Insurance
- Caravan and Trailer Insurance
- Financial Planning and Advice

Business Banking Products

- Business Accounts
 - Term deposits
 - Merchant facilities
 - Business Insurance
 - Trust Account facilities
9. Our headquarters are in Newcastle, NSW. We have 47 branches in our network, located throughout the Central Coast, Hunter region, mid and Central West and the Northern NSW Coastal Area. We also have a further presence online, through our broker network, including within the Queensland market.
 10. During this reporting period Newcastle Permanent was appointed to the Panel of Lenders for the Government backed Family Home Guarantee program after a comprehensive and competitive nomination process. Participation in these programs supports Newcastle Permanent's on-going commitment to the community by assisting more people into their own homes, especially in Regional NSW.
 11. As a regionally based building society, a fundamental part of our organisational ethos is a commitment to support our local communities and provide various local sponsorship programs.
 12. We primarily facilitate our community support through the Newcastle Permanent Charitable Foundation ("the Foundation"), which is a community support fund established for the purpose of enabling our charitable activities and operations by providing grant funding for eligible not-for-profit organisations and community groups.
 13. During the reporting period, the Foundation has maintained its focus in supporting community health and well-being for disadvantaged and marginalised people in our communities. The Foundation distributed \$1,634,000 in grant funding during this reporting period. The Foundation's Trustee is the Newcastle Permanent Community Foundation Company Limited. The Newcastle Permanent Funding Trust No. 1 is a securitisation trust program established under a master trust deed.
 14. In this reporting period, we have experienced growth in our operations and customer base. Newcastle Permanent now have approximately 330,000 customers across Australia and employs 943 staff members across our various branches and locations.
 15. As flagged in our Second Modern Slavery Statement, Newcastle Permanent has announced our intention to undertake a merger with the Newcastle based mutual bank, Greater Bank Limited. We are pleased to report that our due diligence phase has been completed. At the date of preparing this statement, Newcastle Permanent is operating under a Merger Implementation Agreement (MIA).
 16. We have submitted all relevant regulatory approvals and paperwork to the Australian Prudential and Regulation Authority (APRA) for review and we anticipate being in a position to report on the outcome of the proposed merger in our next Modern Slavery Statement. We continue to factor the proposed merger into our modern slavery commitments for future reporting periods, outlined further in Part Four, to ensure that this forms a key part of any organisational transition.

Our Supply Chains

17. Given our operations have not materially shifted since our last Statement, our supply chains have remained relatively static over this reporting period. Newcastle Permanent has over 620 direct Supplier relationships supporting our operations providing goods and services in the following industry categories:
- Accounting services;
 - Architectural services;
 - Banking services;
 - Business services;
 - Cleaning providers;
 - Computer and technical services;
 - Market research services;
 - Legal services;
 - Employment placements services;
 - Telecommunication services;
 - Courier services;
 - Maintenance and repair services;
 - Security providers;
 - Printing and office stationary providers; and
 - Retail trade.
18. The industry categories that we procure from have not varied significantly across the respective reporting periods, which is reflective of the continuity and consistency of our business services and financial product offerings.
19. These suppliers are all either located in Australia or Australian based subsidiaries of major global conglomerates.

Our investments

20. During the reporting period, Newcastle Permanent and the Foundation's investment portfolios remained largely unchanged from prior reporting periods. Our investments remain primarily held in other banks and financial services providers with Australian based operation.

PART TWO – Assessing Modern Slavery Risks in our Operations and Supply Chains

21. Newcastle Permanent, by virtue of our professional services focused model, remains inherently low risk in terms of exposure to modern slavery in our operations and supply chains. Accordingly, during the reporting period we did not identify, through our risk assessment processes, any suspected instances of modern slavery in our operations, supply chains or investment portfolios. We also have not been alerted to any reports of concern through existing whistleblower mechanisms.
22. Nonetheless, we recognise that our relatively low modern slavery risk profile does not alleviate our responsibility to actively assess our operations and supply chains.

Supply Chain Risk

23. During this reporting period we continued our partnership with our subject matter expert to undertake risk assessments using their proprietary technology to analyse the cumulative modern slavery risk, through to the tenth tier, of our supply chains which assesses the complex interaction between factors including:
 - total supplier spend amount (i.e. the value of our direct supplier contracts);
 - industry category, including industries that, in turn, feed into particular categories further down the supply chain;
 - geographical area of operation; and
 - depth of tiering within the supply chain(s)- e.g., 3rd tier supplier, 5th tier supplier, etc.
24. Appendix 1 contains a summary of the risk assessment methodology used for our risk assessments.
25. The assessment, based on procurement data for this reporting period, has identified the areas of greatest theoretical exposure to modern slavery risk in our supply chain is most concentrated at **tier two and three**, specifically within the following industry categories:
 - Australian Suppliers of Periodicals
 - Australian Computer and Technical Services
 - Australian Business Services and Services to Finance
26. This is the third consecutive reporting period that the industry of Australian Computer and Technical Services has been identified in the risk assessment, as an area of heightened supply chain risk. The commentary set out in our Second Statement remains relevant in understanding the risks that are associated with the use of high-risk computer / electronic hardware, which are well recognised to often be manufactured in high risk locations, including China and Malaysia, using high risk raw inputs.
27. Given the prevalence of this industry category over multiple reporting periods, it is a key area of ongoing and prolonged focus that remain a priority for individual and product-category-based supplier due diligence. It also underscores the importance of pursuing opportunities for further industry collaboration to encourage broader positive change.
28. Additionally, our external partners have continued to monitor the specific risks posed by the two suppliers referred to in our second reporting period as having alleged linkages to Uyghur forced labour, including assessing media reports and the current Modern Slavery Statements and Corporate Sustainability reports of these two entities. ¹Whilst we are presently satisfied that reactive measures such as the suspension or termination of these supplier relationships is not warranted, we continue to evaluate any risks posed by these suppliers on an ongoing basis. This includes monitoring of company and product/company blacklisting under international instruments designed to combat the state sanctioned forced labour of the Uyghur people, such as the recently passed US legislation, the Uyghur Forced Labor Prevention Act.
29. The risk exposure for the categories of Business Services and Services to Finance remains largely the same as the risks posed by the Computer and Technical Services industry, given the similar usage of high-risk electronic componentry. Again, these industries have also been flagged in prior risk assessments, indicating the longevity of our risk exposure with these industry categories. As such, we will continue to monitor the suppliers operating in this industry and focus due diligence efforts, particularly at the point of contract engagement.

¹See further Australian Strategic Policy Institute's 2020 Report: Uyghurs for sale: 'Re-education', forced labour and surveillance beyond Xinjiang', available at <https://www.aspi.org.au/report/uyghurs-sale>.

Australian Periodicals

30. The updated risk assessment identified an additional category in relation to our procurement spend over our third reporting period. This category of 'Periodicals' includes suppliers from which we purchase subscription-based services. There is a strong overlap between our suppliers operating in this industry category and the above industry category of 'Business services'. Therefore, rather than representing a material shift in our procurement decisions and overall risk profile, the flagging of this additional industry category is indicative of the intersecting nature of our supply chains, such that the same high-risk componentry (e.g. computers and electronics) continues to permeate across multiple industries.

Investment Supply Chain Risk

31. Newcastle Permanent has undertaken bi-annual risk assessments on our investment portfolio and the investments held by the Foundation across the reporting period, using the proprietary technology developed by our external partners.
32. Our investment mandate has not differed from the first and second reporting periods and we continue to invest in accordance with our internal investment policies. As a result, we invest only in Australian-based diversified banks, specialised finance, Australian-based regional banks and government-controlled financial institutions, which are assessed as having an overall lower risk profile.
33. The Foundation's investment portfolio remains largely the same as prior reporting periods, due to the exclusive investment in Australian asset management and custody banks managed by Australian based managers, with underlying investments held in cash and fixed income investments, international equities and domestic growth assets. In accordance with our due diligence process a self-assessment questionnaire was issued to our investment advisor as part of the agreement renewal process, which is covered in more detail in Part Three. The Foundation's investment advisor has a responsible investments framework, is a signatory to the United Nations Principles for Responsible Investment and a member of the Responsible Investment Association Australasia (RIAA).
34. We are pleased to report that across the bi-annual risk assessments, the risk profile, specifically the theoretical slavery footprint per million dollars invested, remained very low and unchanged for both the Newcastle Permanent investments and the Foundation investments that are managed by an external investment advisor who places the funds with the external fund manager. We will continue to monitor the respective investment portfolios by continuing the six (6) monthly risk assessments and reporting on any material changes or follow up actions undertaken in future statements.

Assessed Risks in our Operations

35. In addition to conducting risk assessments across our supply chains, Newcastle Permanent recognises that as a provider of financial services, we may have vulnerable customers who are trapped in circumstances of modern slavery attending our branches and utilising our facilities and services. Whilst Newcastle Permanent are not causing or contributing to such instances, we recognise our role as a potential point of contact and possible risk detection for vulnerable and exploited individuals. In recognition of this operational risk, we continue to support training for our customer facing staff about financial indicators of modern slavery.
36. Similarly, the services offered as part of our banking operations may inadvertently enable transactional activities that perpetuate financial crimes and associated modern slavery activities, including online sexual exploitation of children or illegal transfers of recruitment fees. To address these risks, Newcastle Permanent strictly adheres to certain anti-money laundering legal and regulatory frameworks (including AUSTRAC protocols), which address overlapping modern slavery risk indicators. Upon detecting any red flags in accordance with these regulations, Newcastle Permanent is committed to strictly adhering to all proper reporting protocols.
37. We also recognise that, as a professional services business, we have linkages to higher risk supplier industries as part of our day-to-day operations. This includes the use of commercial cleaners, caterers, and facilities management services. These industries are recognised areas of elevated modern slavery risk within the domestic Australian context, due to the presence of vulnerable workers, low barriers to entry and a proliferation of subcontracting arrangements clouding the exploitative nature of working arrangements. Whilst our linkages to these industries are typical of any Australian professional service provider and financial institution, we continue to take this operational risk exposure seriously, and continuously monitor our suppliers within these categories for any indicators of elevated modern slavery risk

PART THREE – Addressing Modern Slavery Risks

38. Newcastle Permanent remains committed to improving our modern slavery actions and responses year-on-year. This reporting period we;
- finalised the Vulnerable Person's Policy;
 - continued providing modern slavery training to our supplier management and customer facing teams;
 - provided access to modern slavery training to our Suppliers;
 - conducted risk assessments on our top 120 Suppliers;
 - issued 171 Self-Assessment Questionnaires to non-reporting Suppliers; and
 - conducted quarterly Working Group sessions to review progress on achieving our commitments set out in our second Modern Slavery Statement.

Internal Governance

Policy Updates

Modern Slavery Clauses

39. In our First and Second Modern Slavery Statements, we reported on our efforts to introduce and roll out modern slavery specific clauses for our Supplier Agreements. These clauses have been developed to require our suppliers to address modern slavery in their own supply chains and operations.
40. We have continued to extend the scope of this initiative during the current reporting period, and we have now integrated the modern slavery clauses into 171 supplier agreements. This represents approximately 43% of all suppliers with expected expenditure greater than \$100,000 that have been assessed as having a potentially elevated modern slavery risk. Newcastle Permanent continues to use the process of contract negotiation as a vehicle to ensure our anti-slavery expectations are clearly communicated to suppliers.
41. Given the frequency with which we enter into contracts, this initiative will continue in all foreseeable reporting periods, as the requirement to include such clauses is assessed when engaging new suppliers or when an existing agreement is reviewed for renewal or extension. As such, we will continue to provide limited status updates in future reporting periods, only with respect to the percentage of modern slavery clauses rolled out for suppliers with higher theoretical risk profiles and contracts with an estimated expenditure greater than \$100,000.

Strategic Procurement Policy

42. A key focus of the second reporting period was the development, approval and initial implementation of the Strategic Procurement Policy, which established an in-built supplier modern slavery risk assessment as a mandatory feature of the procurement process.
43. During this reporting period the Strategic Procurement Policy was fully operationalised and we continued to screen and assess the Modern Slavery risks of all new and prospective suppliers utilising the sophisticated tools provided by our external partners and our internally developed desktop review risk matrix. This internal review process focuses on assessing the due diligence systems of suppliers that are reporting entities and for non-reporting entities, possible linkages to high-risk geographies and industries. Neither our internal, or external risk assessments have revealed any instances of modern slavery within our supplier base that warranted further follow up or remedial action. We have scheduled a review of the strategic procurement policy during the next reporting period and will provide any resulting updates on the outcome of this policy in our next statement.

Vulnerable Persons Policy

44. During this reporting period we finalised the review, update, and operationalisation of our Vulnerable Persons Policy to include modern slavery specific clauses. The ambit of this policy is to provide frontline staff with the necessary processes to detect and respond to any suspected victims that may present at our branches, including a focus on detecting key financial indicators of potential slavery conditions. This policy was published in our controlled document management system (CDMS) and is available to all staff across the organisation. This Policy will assist in identifying and combatting modern slavery at the point of financial transactions.

Governance Structures and Oversight

Working Group

45. In our second Modern Slavery Statement, Newcastle Permanent committed to refining our approach to managing modern slavery risk to ensure we are operating a 'fit for purpose' method of organisational oversight. In the FY22 reporting period, this took the form of building the capabilities of our working group to steer and monitor our modern slavery approach. While the Group was established during the first reporting period, we have given thought to maturing the mandate and operation of the Group, so that we move towards deeper operational engagement across the organisation.
46. The group is now comprised of the following members:
- the Chief Operating Officer;
 - the Business Manager of Transformation and Operations;
 - the Manager Procurement and Stores; and
 - additional internal stakeholders by invitation /as required basis.
47. The working group met on a quarterly basis throughout the reporting period and used this Group as a vehicle to more meaningfully track our progress and assess the effectiveness of our initiatives.

Education and Training

48. Newcastle Permanent has provided tailored training to build internal awareness in previous reporting periods. In our second statement, we set ourselves a specific goal to ensure all team members with modern slavery related responsibilities completed Modern Slavery training. Therefore, in our third reporting period we continued to roll out the specialised training programs developed in the second reporting period, and introduced mandatory Modern Slavery training for all contract owners as they perform a key role in overseeing our risk exposure.
49. Newcastle Permanent also established a process to monitor movements in the contract owner team to ensure training obligations are met. As a result, by the end of the reporting period a total of 143 staff members completed the training, including 99 contract owners and 44 contract administration staff, which represents a significant increase from the prior reporting period.
50. Over 300 frontline staff have also completed the specialist modern slavery training, which is now an integral part of their induction process.

Supplier and Investment Engagement and Due Diligence

51. Newcastle Permanent's approach to due diligence during the reporting period has centred on engagement and screening our suppliers. In addition to the risk assessments undertaken in accordance with our strategic procurement policy, our supplier due diligence and engagement has taken the following forms:
- conducted external detailed risk assessments for new suppliers;
 - issued supplier self-assessment questionnaires; and
 - continued providing modern slavery education material to select suppliers.

External Risk Assessment Screening of New Suppliers

52. As an extension of the Strategic Procurement Policy, Newcastle Permanent has conducted detailed risk assessments on a number of prospective suppliers prior to approving and on-boarding.

Supplier Self-Assessment Questionnaires

53. A major focus area during this reporting period was improving supplier engagement outcomes through modern slavery self-assessment questionnaires, which was identified in our second modern slavery statement as a key area of ongoing due diligence.
54. Self-Assessment Questionnaires were sent to approx. 171 Suppliers, which is an increase from previous reporting periods. Overall, responses were received from approx. 58% of the surveyed suppliers. In conjunction with our external partners and other industry bodies, this will be an area to focus on in future reporting periods.

55. The responses received were reviewed and weighted by our external partners and this information will assist in our approach to individual engagement. While maintaining the anonymity of our suppliers, the following was observed from the survey responses:

- almost three quarters of respondents report to have at least one linkage to known areas of high risk within Australia, such as a reliance on commercial cleaning or use of solar panels;
- there is a large disparity in how the respondents are seeking to identify and assess modern slavery risk. Half the respondents had no or very minimal systems in place to map their supply chain or screen supplier risk. However, the remaining suppliers reported having sophisticated and robust risk identification frameworks in operation;
- all but one of the assessed suppliers reported the existence of some form of policy or governance structures to address modern slavery, or an intention to introduce such measures in the near future; and
- across the areas of due diligence, grievance mechanisms and remedial frameworks, the suppliers scored the lowest in the category of ‘remedy’, with just over a third of suppliers reporting to have a formal mechanism in operation.

Education for Suppliers

56. In our Second statement, we committed to providing our Suppliers with access to Modern Slavery training, so throughout this reporting period we provided over one hundred of our Suppliers with access to online education modules developed by our external partners.

57. During the reporting period, we also enlisted our contract owner team to engage with our suppliers to encourage them to complete the Self-Assessment Questionnaires and complete the Modern Slavery Training.

Industry Collaboration and External Stakeholder Engagement

58. The final key commitment flagged as a focus area for FY22 was to increase our participation in industry collaboration. As our industry matures in its response to modern slavery over successive reporting periods, we want to engage in collective action to leverage greater change.

59. Initial steps in this process included participating in the following initiatives and forums to improve our understanding of how our industry is currently addressing modern slavery:

- a. Engagement at the 2022 Chartered Institute of Procurement and Supply (CIPS) conference with the modern slavery discussion and panel sessions.
- b. Participation in numerous industry specific modern slavery discussions and interactive webinars with ethiXbase, GRC Solutions and Informed 365.

PART FOUR – Measuring the Effectiveness of our Modern Slavery Response

65. Over the two past reporting periods, Newcastle Permanent has established a framework of key performance indicators to track progress, to allow us to take stock of our efforts and interrogate the effectiveness of our approach, to allow for an agile response that is sensitive to our unique risk profile.
66. Our working group has taken the responsibility of actively reviewing progress at quarterly intervals against the following indicators, to ensure Newcastle Permanent continues to fulfil our commitments and strive towards continuous improvement:

Key Performance Indicator	Progress indication
Undertake desktop reviews, and further investigation of <i>suppliers</i> with an elevated risk profile and are also reporting entities under Act.	Completed. Internal desktop reviews completed and external risk assessment of 120 suppliers by consultant.
Issue targeted questionnaires to <i>suppliers</i> that are not reporting entities under the Act.	Completed. Issued 171 surveys during the reporting period.
Undertake desktop reviews, and further investigation of <i>investment providers</i> with an elevated risk profile that are reporting entities under Act.	Completed. External risk assessment completed for Investment portfolio and Foundation Portfolio in December 2021 and June 2022.
Issue targeted questionnaires to high-risk <i>investment providers</i> that are not reporting entities under the Act.	Completed. Survey issued to investment advisor ahead of contract renewal.
For all <i>suppliers</i> on which Newcastle Permanent expects to spend more than \$100K in total to undertake modern slavery training.	Completed. Training modules issued to 111 suppliers.
For all contract owners to undertake modern slavery training.	Completed. A total of 99 contract owners and 44 contract admin staff have completed training.
Reporting on a periodic basis of activities of the Modern Slavery Working Group and ongoing compliance obligations	Completed and ongoing. Working Group met on quarterly basis.

67. Newcastle Permanent intends to revisit our existing framework upon confirmation of the merger with Greater Bank Limited. It is understood that as a result of the merger we may need to review the approach to managing modern slavery issues, including the metrics currently used to evaluate our risk frameworks, and roadmap to continuous improvement.
68. In future reporting periods, we will develop a modern slavery roadmap for the merged organisation and provide specialist training to the new Board of Directors.
69. Pending the merger, Newcastle Permanent will assess the viability of undertaking the following additional measures in future reporting periods:
- Reviewing the suitability of supplier self-assessment questionnaires, given the low response rate over consecutive reporting periods and exploring ways to bolster supplier engagement;
 - Review the necessity of updating or refreshing our tailored training content for staff, particularly our contract owners and customer facing staff;
 - Development of a Supplier Code of Conduct and a Modern Slavery Grievance Policy, given there have been no reports of actual or suspected instances of modern slavery through existing grievance mechanisms; and
 - Undertaking desktop audits of suppliers assessed as high risk.

PART FIVE – Consultation with Controlled Entities and Other Relevant Information

70. All necessary consultation and engagement across all controlled entities has occurred in relation to the modern slavery response over the reporting period, as set out in this Statement.
71. We have assessed procurement data from all controlled entities set out above at paragraph [5] above to inform our risk assessment detailed at Part Two and we have sought to prepare this statement with input and consideration from these entities.
72. As detailed throughout this statement, pending approval from the Australian Prudential Regulation Authority, we anticipate undergoing a merger with Greater Bank in upcoming reporting periods in accordance with our executed Merger Implementation Agreement. We will continue to report on the impact this has on our overall modern slavery risk profile in future statements.

APPENDIX – Initial Risk Assessment Methodology Summary

1. As discussed in Part Two of this Statement, we have continued our engagement with external subject matter experts to carry out the same comprehensive risk assessment in relation to new supplier categories that were not previous subject to assessment. This baseline exercise provides the basis for our subsequent focus for ongoing due diligence and remediation activities across not only the present reporting period but also for upcoming years.
2. Incorporating company spend data throughout global markets, we have utilised external partners with proprietary technology to trace the economic inputs required to produce products and services sourced from Tier 1 suppliers to Tier 2 suppliers, Tier 2 suppliers to Tier 3 suppliers, and so on, all the way to Tier 10 suppliers of the supply chain of WPP AUNZ's top suppliers by spend.
3. This supply chain mapping was performed using a balanced, global Multi-Regional Input-Output (MRIO) table that links supply chain data from 190 countries, and in relation to 15,909 industry sectors. This MRIO table is assembled using the following sources:
 - The United Nations' (UN) System of National Accounts;
 - UN COMTRADE databases;
 - Eurostat databases;
 - The Institute of Developing Economies, Japan External Trade Organisation (IDE/JETRO); and
 - Numerous National Agencies including the Australian Bureau of Statistics.
4. The MRIO is then examined against the following international standards:
 - The UN Guiding Principles on Business and Human Rights;
 - The Global Slavery Index;
 - International Labour Organisation (ILO) Global Estimates of Modern Slavery; and
 - The United States' Reports on International Child Labour and Forced Labour.
5. A proprietary algorithm has then been applied to synthesise publicly available risk data against the exclusively licensed MRIO table. The result of this process is the creation of a modern slavery risk profile to Tier 10 for each supplier of WPP AUNZ.
6. This analysis was performed for the purposes of risk identification under Section 16(1) (c) of the Act. No information confirms the actual existence of non-existence of slavery in WPP AUNZ's supply chains, operations or investments. Analysis was undertaken at the industry and country level. It does not account for variances at the entity, region or product level.
7. The multi-faceted approach to modern slavery risk assessment that we have undertaken has included examination and analysis of the following:
 - The individual suppliers and industries with the most elevated risk of modern slavery;
 - Supply chain and investment plots to provide a visual representation of the supply chains for WPP AUNZ' top 3 first tier industries;
 - Plotting the relative slavery risk in the supply chain by tier, up to tier 10;
 - Geographical depiction of the cumulative risk of modern slavery across the supply chain around the world; and
 - An overview of the classification of the first tier of our supply chain by country and industry, including relative modern slavery risk.
 - Suppliers in our supply chains and operations that posed any calculated risks in relation to modern slavery were identified.