



ADDRESSING MODERN SLAVERY

How we will work with you to address the risks of modern slavery in your business operations and supply chains



WHY YOUR COMPANY NEEDS TO ADDRESS MODERN SLAVERY

An estimated 49.6 million men, women and children worldwide are victims of modern slavery, with more than half of them in the Asia-Pacific region, where there are strong links to Australian businesses.

The uncomfortable truth: there is a high likelihood that modern slavery and labour exploitation are occurring in your supply chains.

At Sustainable Business Matters, we work with values-based companies like yours that are passionate about eliminating these human rights abuses from all parts of their business operations and supply chains.

We will help you create change, and produce a detailed, meaningful Modern Slavery Statement that demonstrates to your stakeholders that you take this matter seriously.

Compliance with the Modern Slavery Act 2018 (Cth)

To produce a Modern Slavery Statement that complies with the Commonwealth Modern Slavery Act 2018, you need to meet seven mandatory criteria. A Modern Slavery Statement must, in relation to each reporting entity covered by the statement:

1. **Identify** the reporting entity
2. Describe the reporting entity's **structure, operations and supply chains**
3. Describe the **risks of modern slavery practices** in the **operations and supply chains** of the reporting entity and any entities it owns or controls
4. Describe the **actions taken** by the reporting entity and any entities it owns or controls to **assess and address** these risks, including **due diligence** and **remediation processes**
5. Describe how the reporting entity **assesses the effectiveness** of these actions
6. Describe the **process of consultation** with any entities the reporting entity owns or controls (a joint statement by these entities must also describe consultation with the entity giving the statement)
7. Include any other **relevant information**

The government also wants to know how the **COVID-19 pandemic** has affected your business operations and supply chains, what potential modern slavery impacts it has had, and how these impacts are being addressed.

HOW WE WILL WORK WITH YOU

We will work with you over a number of different phases to ensure you are complying with the requirements of the Act. This process can take anywhere from four to twelve months.

- **Phase 1:** Training, gap analysis and action planning
- **Phase 2:** High-level risk assessment to ensure you understand your modern slavery risks
- **Phase 3:** Taking action to mitigate risks, including supplier engagement
- **Phase 4:** Producing your Modern Slavery Statement



PHASE 1: TRAINING, GAP ANALYSIS AND ACTION PLANNING

1A. Training

Understanding modern slavery is the first step in the process. How will your team know how to look for modern slavery in your business operations and supply chains if they don't know what it is?

In the training, your team will learn about:

- The different types of modern slavery
- How modern slavery may occur within your business operations and supply chains
- How your company may be contributing to modern slavery
- Human rights, labour rights and labour exploitation
- Modern slavery legislation – the Modern Slavery Act 2018 (cth)
- Why it is important for your company to be addressing modern slavery
- What your stakeholders expect of you in terms of tackling modern slavery and human rights abuses
- The steps involved in meeting the seven mandatory criteria under the commonwealth Modern Slavery Act

1B. Gap analysis

Sustainable Business Matters will conduct a **review of your company's policies and procedures** to understand what systems and processes you have in place that are relevant to addressing modern slavery.

We will engage with you and your team to understand **what is important to your business, your stakeholders and your clients**. This includes evaluating client tenders, contracts and email requests.

1C. Action plan

Using the results of the gap analysis, Sustainable Business Matters will develop an **Addressing Modern Slavery Action Plan** to assist you in prioritising your next steps.

There is a lot to consider during this process, and it can be overwhelming. Rest assured that we will help you map this out step by step, so you understand what needs to be done, what resources are required and how to allocate responsibilities and determine a timeframe for completion.

OUTCOMES OF PHASE 1

1. Your team will understand the different types of modern slavery
2. Your team will understand what your stakeholders expect of you in terms of addressing modern slavery
3. You will have an action plan outlining the next steps involved in meeting these expectations

Phase 1 will help you comply with criterion four of the seven mandatory criteria under the Commonwealth Modern Slavery Act.

PHASE 2: HIGH-LEVEL MODERN SLAVERY RISK ASSESSMENT

Phase 2 focuses on understanding **where** modern slavery may be occurring in your business operations and supply chains. How will your team know how to tackle modern slavery if you don't know where it is happening?

2A. Supply chain mapping

We will help you map your supply chains in detail, so we know:

- **What** products, materials, goods and services you are procuring
- **Where** these products, materials, goods and services come from
- **How much** these products, materials, goods and services cost

We'll take a deep dive into your procurement processes to identify where there are risks of modern slavery. (Note: this includes all your operational and business-related expenses.)

2B. High-level risk assessment

In this step, we will gather all your data and put it into our database to determine where the highest risks of modern slavery are within your business operations and supply chains.

We will look at all of the following categories:

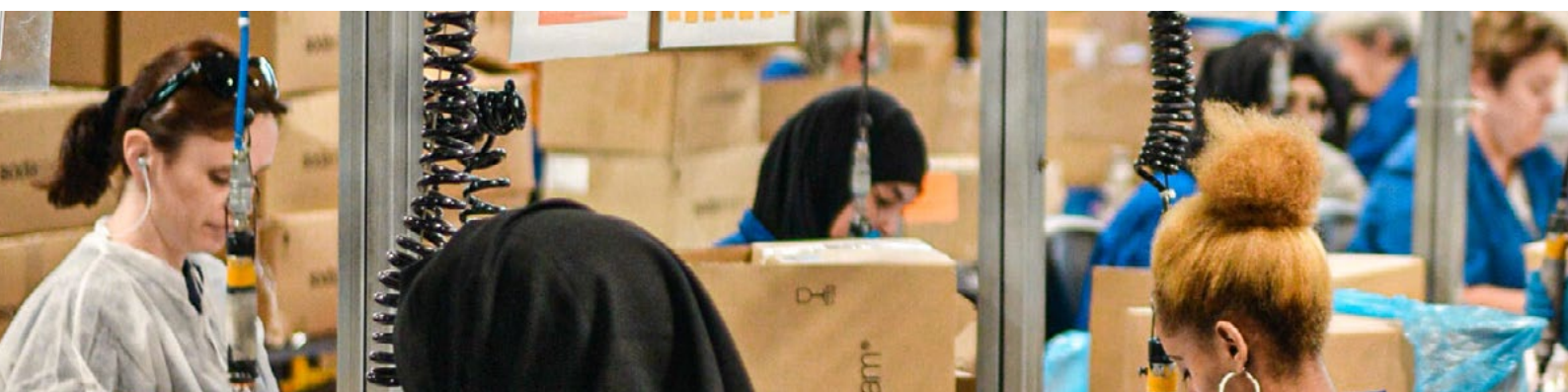
- High-risk countries
- High-risk products and materials
- High-risk goods and services
- High-risk worker types
- COVID-19 related human rights risks

We can also help you **undertake a human rights risk assessment** in conjunction with the modern slavery risk assessment.

OUTCOMES OF PHASE 2

1. Your team will understand **where modern slavery** may be occurring within your business operations and supply chains
2. Your team will understand which **types of modern slavery** may be prevalent within your supply chains

*Phase 2 will help you comply with **critterion three** of the seven mandatory criteria under the Commonwealth Modern Slavery Act.*



PHASE 3: TAKING ACTION TO MITIGATE RISKS

3A. Supplier engagement

Sustainable Business Matters will help you develop a **Supplier Engagement Strategy** that includes:

- Your Expectations and Requirements Around Modern Slavery
- Supplier Communication Methods
- Feedback Channels
- Supplier Leverage
- Supplier Capacity Building

Supplier engagement can be challenging, but it can also be rewarding. This process will help you better understand your suppliers, with the aim of involving them in the process of bringing about change. The ideal outcome is for all your suppliers to participate, but this won't always be possible.

This process typically includes the development of a **Suppliers' Code of Conduct**.

3B. Evaluation of individual suppliers

We will help you take targeted action towards suppliers that have been deemed high-risk during the high-level risk assessment in Phase 2.

We will send **Supplier Self-Assessment Questionnaires** to your suppliers to help us understand what processes and policies they have in place so we can better assess whether they should be classified as high-risk.

We will conduct a detailed evaluation of suppliers and produce individual **Supplier Action Plans** or conduct remediation if we have any concerns about modern slavery risks.

3C. Human Rights Policy

We will help you develop a **Human Rights Policy** that outlines your company's commitment to upholding human rights, based on international human and labour rights principles, standards and guidelines.

3D. Remediation Procedure

We will help you produce a **Remediation Procedure** that outlines the steps to be taken when modern slavery is detected within your business operations and supply chains.

3E. Addressing Modern Slavery Evaluation Tool

We will help you create an **Addressing Modern Slavery Evaluation Tool**. It serves a number of purposes, including helping you track and evaluate the actions you have taken to assess and address modern slavery risks, and helping you map out the actions you will take in the future.

OUTCOMES OF PHASE 3

1. Your team will understand how to work with your suppliers to get the best possible results.
2. Your team will understand the modern slavery risks of your individual suppliers and be able to determine whether further action is required to mitigate these risks.

*Phase 3 will help you comply with **criteria four and five** of the seven mandatory criteria under the Commonwealth Modern Slavery Act.*

PHASE 4: DEVELOPING YOUR MODERN SLAVERY STATEMENT

In this phase we will help you produce a Modern Slavery Statement in line with the seven mandatory criteria set out in the Commonwealth *Modern Slavery Act*. It will be a comprehensive, meaningful statement that demonstrates your strong social and ethical values and your commitment to take this matter seriously.

This is where all the hard work, dedication and commitment finally pay off – it's your time to shine! This is not a box-ticking exercise – it's real, transformational change that you can be proud of.

OUTCOMES OF PHASE 4

1. Your company will have a comprehensive, meaningful modern slavery statement that complies with the seven mandatory criteria of the Commonwealth *Modern Slavery Act*.

ABOUT SUSTAINABLE BUSINESS MATTERS

Libby Staggs is the owner and founder of Sustainable Business Matters, and is an expert strategist in sustainability, modern slavery and human rights supply chain management.

Libby is also an active and influential member of the eco-labelling and green community, is a Green Star Associate with the Green Building Council of Australia (GBCA), and in 2018 was a participant on the GBCA's Expert Reference Panel for Human Rights.

She has 14 years' experience working with product manufacturers and retailers who want to elevate their ethical and social sustainability standards. She partners exclusively with values-driven organisations, to educate, inspire, empower and activate.



WANT TO KNOW MORE?

Do you have any other questions about modern slavery risks within your company? If you'd like to chat, we offer an obligation-free discovery call. You can ask us anything you'd like to know about the process of developing a **Modern Slavery Statement** for your company.

Our principal, Libby Staggs, can be contacted on:

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