

## POLICY: COMBATTING MODERN SLAVERY

St Vincent de Paul Society National Council of Australia Incorporated (ABN 50 748 098 845, ABRN 61807 9952) is the superior council for the Society in Australia. The Society in Australia includes every entity that operates across the Australian States and Territories, referred to as a State Council or a Territory Council, and includes any related entity that operates under a State Council or a Territory Council.

In this Combatting Modern Slavery Policy, the terms “we”, “our”, “us” and “the Society” refer to the National Council, to a State Council or to a Territory Council, and to any related entity that operates under a State Council or a Territory Council.

### OVERVIEW

We are committed to combatting modern slavery in the operations and the supply chains of all entities that make up the Society in Australia.

We require all entities that make up the Society in Australia to put in place systems to:

1. Identify and assess potential areas of risk of modern slavery occurring in our supply chains;
2. Mitigate the risk of slavery and human trafficking occurring in our supply chains; and
3. Monitor potential areas of risk in our supply chain.

We will adhere to the reporting requirements of the *Modern Slavery Act 2018 (Cth)* and we will review our workplace policies and procedures to assess their effectiveness in identifying and tackling modern slavery issues.

### PURPOSE

The Society is committed to acting ethically and with integrity in all our commercial relationships and to putting in place effective systems and controls designed to identify whether slavery or human trafficking is likely to be taking place anywhere in our supply chains.

Where slavery or human trafficking is likely to be taking place in a supply chain, we will look to sourcing the goods or services from an ethical supplier.

### SCOPE

The *Modern Slavery Act (2018)* applies to entities based or operating in Australia with annual consolidated revenue of more than \$100 million. As at March 2021, this threshold is met by a number of, but not all, Society entities operating in Australia.

National Council supports the intent of The *Modern Slavery Act (2018)* and its application to all the Society entities operating in Australia and, to those Society entities in overseas countries where a country's National Council receives moneys from Australia for the conduct of activities in the recipient country.

### DEFINITIONS

**Modern slavery:** is any conduct where a person is being exploited to work and is unable to leave of their own will, due to threats of violence, coercion, abuse of power or deception. Modern slavery includes the worst forms of child labour, forced labour, slavery, servitude, debt bondage, human trafficking, deceptive recruitment and forced marriage. Any offence under Division 270 or 271 of the *Commonwealth Criminal Code* constitutes modern slavery.

**Consolidated revenue:** refers to the total revenue of the entity for a reporting period, or if the entity controls other entities, the total revenue of the group of controlled entities for a reporting period.

## POLICY

### Suppliers and contractors

The Society has zero tolerance for practices of modern slavery and expects everyone involved in our supply chains be aware of our commitment to end such practices.

The Society will move toward audits of suppliers and contractors. We will ensure that contracts between the Society and our suppliers/contractors include clauses requiring compliance with the *Modern Slavery Act 2018*.

Below are some questions that could be helpful to consider when seeking information from suppliers/contractors:

- Do they hire low-skilled foreign or domestic migrant workers (directly or through recruiters)?
- Do they use recruiters who hire subcontractors to recruit workers?
- Do they have a policy/policies explicitly prohibiting workers and agents from the following practices?
  - Engaging in all forms of forced labour and human trafficking.
  - Engaging in child labour.
  - Withholding worker identity or immigration documents.
  - Using recruiters that do not comply with local labour laws of the country in which the recruiting takes place.

### Reporting Requirements

We acknowledge that the Councils, and any related entities that operate under a Council, that meet the legislated threshold will comply with the requirements of the *Modern Slavery Act (2018)*.

We are confident those Councils, and any related entities operating under a Council, that do not meet the legislated threshold provided for in the *Modern Slavery Act (2018)* will endeavour to carry out the following activities:

1. Address the questions outlined in this checklist:

#### Domestic Screening

- a) Do we hire low-skilled foreign or domestic migrant workers (directly or through recruiters) in our own business activities?
- b) Do we use recruiters who hire subcontractors to recruit workers and do these recruiters comply with the relevant Award?

#### Overseas Screening

- c) Do we or can we identify whether any of our suppliers employ directly or indirectly citizens or nationals from countries identified by the Commonwealth Government as partaking in modern slavery.

#### Organisational Policies

- d) Do we have a policy/policies explicitly prohibiting workers and agents from activities such as:
  - i) Engaging in all forms of forced labour and human trafficking?
  - ii) Engaging in child labour?
  - iii) Withholding worker identity or immigration documents?
  - iv) Using recruiters that do not comply with local labour laws of the country in which the recruiting takes place?

And do we, to the best of our ability and where possible, attempt to identify these prohibited practices in overseas countries.

- e) Do we have policies explicitly ensuring the following?
  - i) domestic wages meet national standards.
  - ii) accommodation provided for workers in Australia meets national housing and safety standards.

2. Endeavour to:

- a) review our policies to take this policy into account;
- b) conduct an audit on suppliers and supply contractors;
- c) take steps deemed necessary to address any risks or potential risks which have been identified by the audit; and
- d) implement a process to assess the effectiveness of the steps taken to address potential risks of instances of modern slavery.

## DOCUMENT INFORMATION

<b>TITLE</b>	Combatting Modern Slavery
<b>DOCUMENT TYPE</b>	Policy
<b>DOCUMENT NUMBER</b>	POL_03_NC
<b>AUDIENCE</b>	National Council, State and Territory Councils and related entities
<b>CATEGORY</b>	Governance
<b>LEGISLATION</b>	<b>Modern Slavery Act 2018 (Cth)</b> <b>Corporations Act 2001 (Cth)</b> <b>Tax Administration Act 1953 (Cth)</b> <b>Fair Work Act 2009 (Cth)</b>
<b>RELATED DOCUMENTS</b>	National Action Plan to Combat Human Trafficking and Slavery 2020-25
<b>VERSION</b>	4 March 2021
<b>REVIEW DATE</b>	January 2023
<b>RESPONSIBLE OFFICER</b>	National Council Chief Executive Officer
<b>APPROVER</b>	National Council
<b>ENQUIRIES</b>	National Council Chief Executive Officer