Modern Slavery Risk Management Plan
Warren Shire Council

July 2025

Prepared by

Sustainable Choice
(LGP Strategic Procurement Solutions)

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Definitions and acronyms

CAP	Corrective Action Plan
ESG	Environment, Social and Governance
GECA	Good Environmental Choice Australia – a non-profit organization that certifies products and services for environmental, health, and social impact.
GM	General Manager
GRS	See Guidance on Reasonable Steps
Guidance on Reasonable Steps	A framework developed by the NSW Anti-slavery Commissioner to assist entities to manage modern slavery risks in operations and supply chains. It sets out the main issues and concepts to be understood to meet reporting and due diligence expectations (i.e undertake 'reasonable steps') under NSW modern slavery legislation.
ILO	International Labour Organisation - a United Nations agency that sets international labor standards and promotes rights at work, decent employment, and social protection.
IPM	Infrastructure Project Manager
IRIT	See Inherent Risk Identification Tool
Inherent Risk Identification Tool	A mapping tool developed by the Office of the NSW Anti-slavery Commissioner and others to assist entities to identify the modern slavery risk associated with the different product categories from which they procure.
LGP	Local Government Procurement
Manex	Management Executives
Modern Slavery	Modern Slavery involves situations where individuals are subjected to exploitation, coercion, threats, or deception, undermining their freedom and dignity. It includes forced labour, slavery, servitude, debt bondage, human trafficking, deceptive recruitment for labour services, worst forms of child labour and forced marriage.
RFQ	Request for Quote
RFT	Request for Tender
TCO	TCO Certified is a global sustainability certification for IT products, ensuring they meet environmental and social responsibility criteria throughout their life cycle. TCO stands for "Tjänstemännens Centralorganisation", which is Swedish for "The Swedish Confederation of Professional Employees.
UNGP	United Nations Guiding Principles on Business and Human Rights

1   Introduction

This Modern Slavery Risk Management Plan (Plan) outlines Warren Shire Council's approach to identifying, assessing, and managing the risks of modern slavery within its operations and supply chains. As part of our commitment to ethical governance and compliance with the (NSW) *Local Government Act 1993*, Council seeks to implement reasonable steps to ensure that the goods and services we procure are not the product of modern slavery.
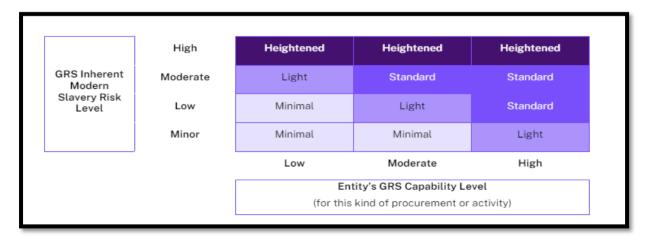
A total of 94 suppliers were invited to participate in a targeted survey developed to assess exposure to modern slavery risks. Of these, 30 suppliers completed the questionnaire. For an additional 17 non-responding suppliers, risk scores were sourced from the LGP's 2024 Modern Slavery Risk Assessment database, resulting in 47 suppliers being assessed in total.

The Plan identifies procurement categories with the highest potential for modern slavery risk, based on both supplier survey responses and insights from the IRIT. It highlights the need for targeted due diligence in areas where high risk categories intersect with medium to high risk supplier profiles. Suppliers flagged for further assessment have also been identified, with recommendations for Council to conduct an additional round of due diligence using publicly available data and direct supplier engagement.

The Plan serves to guide Council in preventing, detecting and responding to modern slavery risks while also providing transparency and accountability to our local community.

Under the NSW Anti-slavery Commissioner's Guidance on Reasonable Steps (GRS), Warren Shire Council's capability level in terms of modern slavery due diligence is determined as low. This means that Council is required to conduct heightened due diligence for procurements with high modern slavery risk, light due diligence for moderate and minimal due diligence for minor and low risk (see Figure 1).

The Plan is also aligned with Council's existing Risk Management Policy and Plan. It supports the integration of modern slavery risk controls into standard procurement and contract management processes, reinforcing Council's ethical and legal obligations.

Figure 1- GRS Due Diligence Levels

GRS Inherent Modern Slavery Risk Level	High	Heightened	Heightened	Heightened
	Moderate	Light	Standard	Standard
	Low	Minimal	Light	Standard
	Minor	Minimal	Minimal	Light
		Low	Moderate	High

Entity's GRS Capability Level
(for this kind of procurement or activity)

1.1 Alignment with Procurement Policy

The modern slavery risk management process outlined in this plan is fully aligned with Council's established Risk Management Policy and Plan. Council recognises that effective risk management is fundamental to achieving the objectives set out in the Community Strategic Plan and delivering services in a way that is ethical, efficient, and accountable.

Council's Risk Management Policy outlines a strong commitment to organisation-wide risk management, guided by the principles of AS ISO 31000:2018 – Risk Management Guidelines. This Policy ensures that risks are consistently identified, assessed, treated, monitored, and reviewed across all areas of Council's operations, including procurement. It reinforces the need to understand both internal and external risks that may impact service delivery, contractual obligations and strategic outcomes, and to embed risk management into all planning and decision-making processes.

Complementing this, Council's Risk Management Plan fosters a risk-aware culture that is applied across all departments, services and functions, including those delivered through third-party arrangements. It highlights the importance of shared responsibility, proactive stakeholder engagement and continuous improvement. The Plan also encourages innovation and ethical governance, supporting the integration of risk management into business-as-usual processes for staff, contractors and partner organisations alike.

Within this context, modern slavery risks, particularly those arising in procurement and supply chains, are managed using the same structured and systematic processes applied to other organisational risks. This includes logical and consistent risk identification, analysis, evaluation, treatment and monitoring. By aligning modern slavery risk mitigation with Council's broader risk management framework, this approach ensures coherence, avoids duplication and strengthens Council's ability to respond to complex ethical risks while fulfilling its responsibilities to the community.

Also, this alignment ensures that modern slavery considerations are embedded throughout Council's procurement activities and across its entire supply chain, thereby ensuring that all business relationships adhere to the highest ethical standards while promoting transparency, integrity and respect for human rights.
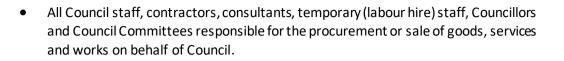
2 Objectives

The objectives of this Plan are to:
- Identify and assess risks of harm to people arising from modern slavery practices within Council's operations and supply chains.
- Implement strategies to mitigate identified risks.
- Take reasonable steps to ensure the goods and services Council procures are not linked to the exploitation of people, in line with the *Modern Slavery Act 2018* (NSW), the GRS and the *Local Government Act 1993* (NSW) and implement.
- Promote transparency and continuous improvement in managing and reducing modern slavery risks.
- Ensure Council's procurement actions align with human rights principles.

3 Scope

This Plan applies to:

- All Council staff, contractors, consultants, temporary (labour hire) staff, Councillors and Council Committees responsible for the procurement or sale of goods, services and works on behalf of Council.

3.1 Assessment team

The team involved in this project from LGP included:

- **Dr Hadi Vandchali**, Consultant, ESG and Procurement Services (Lead Consultant),
- **Tania Lalor**, Senior Consultant, Sustainable Procurement (Support Consultant),

Hadi is an environmental, social and governance (ESG) and procurement services consultant specialising in sustainable procurement. With over 16 years of combined experience across academic and industry roles, he has developed a deep understanding of supply chain operations and the strategic role of procurement in driving sustainability outcomes. His work has focused on identifying best practices, applying leading frameworks and leveraging the latest insights to support organisations in transforming procurement into a value-adding function. Hadi's background blends hands-on industry knowledge with strategic advisory experience, enabling him to develop and implement practical, forward-thinking solutions that align procurement with broader ESG goals.

Tania is a sustainability consultant specialising in sustainable procurement and a vital part of the Strategic Procurement Solutions Team. Tania provides professional consulting advice to guide the integration of sustainability (economic, social and environmental) considerations within procurement. With 25 years' experience in environment and sustainability in both the private and public sectors, she has been involved in environmental planning and assessment, tender evaluation, governance and sustainability in procurement. Tania also works with LGP Approved Contractors to better their sustainability awareness and performance. Tania is a regular speaker, workshop facilitator and coordinator for sustainable procurement related topics and has developed content for sustainable procurement and modern slavery related procurement documentation and training. Tania also designed and developed LGP's modern slavery risk assessment process that is applied annually across all LGP Approved Contractors and has been conducted for a number of Councils across their supplier base.

4 Risk Management Process

The risk management process outlined in this Plan consists of three key steps designed to help Council identify, respond to and monitor modern slavery risks within its procurement activities. These steps include: (1) risk identification and prioritisation, to determine where the greatest risks lie; (2) development of risk mitigation strategies, tailored to supplier risk ratings and category significance; and (3) setting and measuring performance targets, to track progress and ensure continuous improvement over time. Each of these steps will be discussed in detail in the following sections.

4.1 Risk Identification and Prioritisation

This step involves analysing modern slavery risks from two key perspectives. The first is salient risk, based on procurement categories identified as high-risk using the IRIT tool. The second is supplier-specific risk, derived from responses to the LGP Modern Slavery Survey. By combining these two perspectives, Council can prioritise areas where procurement activities may pose the greatest potential risk and focus mitigation efforts accordingly.

4.1.1 Salient modern slavery risks

Identifying and assessing salient modern slavery risks in Council's procurement activities is crucial to supporting ethical, transparent, and socially responsible procurement practices. Salient risks are those that have the most severe potential impact on individuals, particularly in categories where supply chains are complex, labour is low-cost and visibility is limited.

Each procurement category carries a different level and type of modern slavery risk and the potential impact can vary in significance depending on various factors such as the nature of the goods or services, the geographic source and the vulnerability of the workforce involved. By focusing on the most significant risks to people, Council can prioritise efforts where the harm is likely to be most serious and take meaningful action to prevent and address exploitation in its supply chains.

To assess the risks associated with Council's procurement activities the following factors were considered.

- What is the Inherent modern slavery risk level of Council's procurement categories?
- How might Council's procurement activities be involved in or connected to modern slavery, either directly or indirectly?
- What level of due diligence is Council required to undertake according to the GRS?

Inherent Risk
The inherent modern slavery risk level of each of Council's procurement categories was assessed according to the IRIT.

Involved or Connected to Modern Slavery
The following definitions were applied when assessing whether Council might be involved in or connected to modern slavery for each procurement category.

Causing modern slavery – Council directly creates or facilitates conditions that lead to modern slavery though its own actions or decisions. For example, Council hires contractors or manages projects that directly exploit workers.

Contributing to modern slavery – Council's actions or policies may not directly cause modern slavery but contribute to the conditions that enable it through their procurement practices. For example, Council may unknowingly engage a supplier that uses forced labour in its operations by not thoroughly vetting or monitoring suppliers.

Directly linked to modern slavery – Council may be indirectly connected to modern slavery through its procurement activities, partnerships or supply chain even if it is not directly involved in exploiting workers. For example, Council may purchase products from suppliers who have a supply chain that involves modern slavery.

Due Diligence Level
This was determined according to Figure 1 in Section 1.

According to the modern slavery risk assessment survey conducted between March and May 2025, the identification of salient risks was based on responses received from suppliers who completed the

questionnaire. The analysis focused only on the supplier categories for which survey data was available, recognising that the insights are representative of those who actively participated in the process. While this provides a valuable snapshot of potential modern slavery risks within Council's supply chain, it is important to note that the assessment does not account for non-responding suppliers. Further details regarding the number of suppliers invited to participate in the survey and the response rate are provided in the following section.

Row	Supplier Name	Category	IRIT Risk	Could Council be causing/contributing to/directly linked to risk?	Due Diligence Required
1	DATAVOICE COMMUNICATIONS (AUST)	ICT - telecommunications	High	Directly linked	Heightened
2	TRACSERV PTY LTD	Fleet vehicles Plant - Services	High	Directly linked	Heightened
3	UTILEX GROUP	Plumbing Supplies	High	Directly linked	Heightened
4	MACQUARIE TOYOTA	Fleet vehicles Fleet Maintenance	High	Directly linked	Heightened
5	SIDE EFFEKT PTY LTD	ICT - computer hardware purchase and disposal ICT - services	High	Directly linked	Heightened
6	TRILITY SOLUTIONS AUSTRALIA PTY LTD	ICT - computer hardware	High	Directly linked	Heightened
7	DELNORTH PTY LTD	Roadside safety products - made from steel, plastic, pvc	High	Directly linked	Heightened
8	DC & BC PLUNKETT	Construction and civil works Roads, paving and concreting	Moderate	Contributing to	Light
9	FULTON HOGAN INDUSTRIES P/L	Construction and civil works Roads, paving and concreting	Moderate	Contributing to	Light
10	HOLCIM (AUSTRALIA) PTY LTD	Roads, paving and concreting	Moderate	Directly linked	Light
11	SUPER SEALING	Roads, paving and concreting Bitumen Sealing	Moderate	Directly linked	Light
12	HUMES CONCRETE PRODUCTS	Roads, paving and concreting	Moderate	Directly linked	Light
13	IOR AVIATION PTY LTD	Aviation Fuel	Moderate	Directly linked	Light
14	PATCHES ASPHALT	Asphalt Supplies	Moderate	Directly linked	Light
15	AGL SALES PTY LTD	Electricity & gas utilities	Moderate	Directly linked	Light

16	SPLAT PLUMBING SERVICES	Construction and civil works Plant & equipment hire Plumbing Services	Low	Directly linked	Minimal
17	A1 TREE SERVICES (NSW) PTY LTD	Open space supplies & maintenance, including landscaping, playgrounds, bush regeneration and arboriculture	Low	Contributing to	Minimal
18	ACS EQUIP PTY LTD	Water bore maintenance	Low	Contributing to	Minimal
19	TYRES4U PTY LTD	Tyre Services	Low	Contributing to	Minimal
20	CENTRAL WEST LINEMARKING	Line marking services	Low	Contributing to	Minimal
21	MLB CONCRETE & CONSTRUCTION	Construction and civil works Plant & equipment hire	Minor	Directly linked	Minimal
22	BURTON ENVIRONMENTAL	Professional services Environmental Consulting (sole trader 1 employee)	Minor	Contributing to	Minimal
23	ROLLERS AUSTRALIA PTY LIMITED	Plant & equipment hire	Minor	Directly linked	Minimal
24	DWYERS TRANSPORT	Plant & equipment hire	Minor	Directly linked	Minimal
25	STATECOVER MUTUAL LIMITED	Insurance and WHS services	Minor	Contributing to	Minimal
26	NEILL EARTHMOVING	Construction and civil works Plant & equipment hire Quarry Operations	Minor	Directly linked	Minimal
27	BUILT ENVIRONMENT COLLECTIVE	Professional services	Minor	Contributing to	Minimal
28	RYAN MASON ENGINEERING	ENGINEERING SERVICES - FABRICATION	Minor	Contributing to	Minimal
29	LANGFORD & ROWE CONSULTING SURVEYORS PTY	Surveying	Minor	Contributing to	Minimal
30	COATES HIRES OPERATIONS P/L	Dry Hire of plant and equipment	Minor	Directly linked	Minimal
31	WATCHOUT TRAFFIC CONTROL	Traffic Control	Minor	Contributing to	Minimal
32	BARNSON PTY LTD	Design Consultant	Minor	Contributing to	Minimal
33	WESTRAC EQUIPMENT PTY LTD	Plant Sales Repairs	Minor	Directly linked	Minimal

34	WORKFORCE ROAD SERVICES	Traffic control	Minor	Contributing to	Minimal
35	CT MANAGEMENT GROUP PTY LTD	Professional consulting	Minor	Contributing to	Minimal
36	DOWNER EDI WORKS PTY LTD	Construction	Further Assessment	Directly linked	TBD^
37	QMAX PUMPING SYSTEMS PTY LTD	Mechanical	Further Assessment	Contributing to	TBD^
38	CONSETH SOLUTIONS PTY LTD	Construction and civil works Professional services	Further Assessment	Contributing to	TBD^
39	RDO EQUIPMENT PTY LTD	Electrical & mechanical services Construction & Agricultural Equipment	Further Assessment	Contributing to	TBD^
40	WESTTECH INDUSTRIAL CONTROLS PTY LTD	Electrical & mechanical equipment – other (including lighting and audio/visual)	Further Assessment	Directly linked	TBD^
41	LANDMARK PRODUCTS PTY LTD	Construction and civil works	Further Assessment	Directly linked	TBD^
42	BRD DESIGN & CONSTRUCTION PTY	Construction and civil works	Further Assessment	Directly linked	TBD^
43	MODUS AUSTRALIA	Construction and civil works - manufacture, supply and construct	Further Assessment	Directly linked	TBD^
44	THE TRUSTEE OF CENTRAL INDUSTRIES TRUST	Construction and civil works	Further Assessment	Directly linked	TBD^
45	PLAY PARKS	Play equipment supplies – various materials	Further Assessment	Directly linked	TBD^
46	IXOM OPERATIONS PTY LTD	water treatment chemicals and infrastructure	Further Assessment	Directly linked	TBD^
47	PRECISION CIVIL INFRASTRUCTURE	Construction and civil works	Further Assessment	Directly linked	TBD^

^TBD (To Be Determined) – This procurement activity has been identified in the IRIT as requiring further assessment, as it may involve labour and materials that present varying levels of modern slavery risk. Council staff should refer to the GRS resource _Modern Slavery Risks in Construction: An Overview_ to support the identification and assessment of associated risks.

4.1.2 Supplier risks

In March 2025, Council engaged Local Government Procurement (LGP) to conduct a modern slavery risk assessment of its suppliers. A survey was distributed to all Council suppliers to gather information on their approach to identifying, managing, and mitigating modern slavery risks within their operations and supply chains. The survey questions were aligned with the _Modern Slavery Act 2018 (Cth)_ and the reporting requirements for Australian modern slavery statements. The collected data was analysed and each responding supplier was assigned a modern slavery risk rating - High, Moderate or Low - based primarily on the strength of their existing measures and controls to address modern slavery risks.

The survey was sent to a total of 94 suppliers. Of these, 30 suppliers completed the questionnaire, providing the primary dataset for identifying category-specific modern slavery risks. The remaining suppliers either submitted incomplete responses or did not respond at all.

To ensure broader coverage, we undertook an additional analysis of the non-responding suppliers by cross-referencing them with the LGP's existing modern slavery risk assessment database from 2024. Through this process, we identified 17 suppliers who had previously completed our modern slavery questionnaire. Their existing risk scores were applied to the current assessment to ensure consistency and maximise data utility.

As a result, modern slavery risk ratings were successfully established for 47 out of the 94 suppliers (attached Excel file).

Risk ratings for current Council suppliers have been used to inform the development of some of the mitigation measures in this Plan.

4.1.3 Risk Mapping

The mitigation strategies have been prioritised by mapping salient and supplier risks as follows:

Priority Level	Procurement Category (Salient Risk-IRTI)	Supplier Risk (LGP Survey)
1	High risk, contributing to	High, Medium and Low risk
2	High risk, directly linked	High, Medium and Low risk
3	Moderate risk, contributing to Moderate risk, directly linked	Medium and Low risk
4	Low risk, contributing to Low risk, directly linked	Medium and Low risk
5	Minor risk, contributing to Minor risk, directly linked	Medium and Low risk

4.2 Risk Mitigation Strategies

This section outlines both general steps and targeted actions that Council can take to ensure their procurement processes are designed to minimise the risk of modern slavery. It includes baseline measures that should be embedded across all procurement activities, as well as tailored mitigation strategies based on the assessed risk level of Council's suppliers and the significance of the procurement category.

4.2.1 General

The following mitigation measures will be adopted to address modern slavery risks at an organisational level.

Mitigations Measure	*Associated 'reasonable step'	Action	Target	Responsible Party
Include modern slavery related commitments in Council's Procurement Policy and Guideline.	Commit	Review and update (if needed).	Reviewed once annually.	GM
Train all staff in modern slavery awareness and Council's modern slavery related commitments.	Commit	Ensure all staff receive and read factsheet and acknowledge this has been completed.	All staff receive and acknowledge annually.	GM
Include modern slavery related requirements in Statement of Business Ethics.	Commit	Review and update (if needed) Statement of Business Ethics.	Reviewed once annually.	IPM
Include modern slavery related requirements in Council's Procurement Procedure and Plan Template.	Plan	Review and update (if needed).	Reviewed once annually.	GM
Review and update Council's inherent modern slavery risks of procurement categories annually.	Plan	Review Council's procurement categories against IRIT risk levels to account for any updates.	100% of procurement categories annually.	GM

Facilitate modern slavery awareness among Council's suppliers by providing resources.	Commit / Manage	Provide suppliers with copy of Modern Slavery Awareness factsheet, Council's Procurement Policy and Statement of Business Ethics.	Received by at least 100% of Council's active suppliers in high risk categories.	Manex
Update and review Contract performance management template and ensure contract managers review modern slavery risks regularly.	Manage	Review and update template.	Reviewed once annually.	IPM
Require suppliers to sign and adhere to Council's Policy and Statement of Business Ethics.	Source	Ensure all suppliers commit to complying with Council's policy and Statement of Business Ethics by providing signed agreement when contracts are awarded.	Received by 100% of suppliers when contracts are awarded.	Manex
Ensure that any suspected or confirmed instances of modern slavery are responded to quickly, ethically and in a manner that protects affected individuals and prevents recurrence.	Remedy	Worksite and supply chain instances - Assist supplier to develop and implement a Remedial Action Plan and monitor progress. Worksite instances - Cease works immediately and ensure affected workers are removed from harm. Investigate and report to authorities as required.	100% of suspected or confirmed cases	Manex
Report annually on the steps taken by Council to ensure that goods and services procured throughout the year were not the product of modern slavery. The report will also include any any actions undertaken in response to issues raised	Report	Using the reporting template provided by the NSW Anti-slavery Commissioner's Office, address all sections. Include a copy of the report in Council's Annual Report and also submit a copy via the	Annually by 30 November	GM

by the NSW Anti-slavery Commissioner during the year.		Annual Reporting Form on the Commissioner's office website.		

*As defined in GRS

4.2.2 Heightened Due Diligence

According to GRS, Council is required to undertake heightened due diligence for procurements that have a high modern slavery risk level.

4.2.2.1 Priority 1

This priority level covers procurement categories identified as high risk in IRIT, where Council may be contributing to modern slavery risks.

Although no current suppliers in these high risk categories were identified through the survey, these are common procurement areas for councils and therefore warrant attention. Council is strongly encouraged to review its procurement processes to identify whether these categories are relevant and take steps to assess and mitigate associated risks.

For example, the following high risk categories have been flagged in IRIT.

High risk categories	Row in IRIT
Security Services	206
Cleaning Services	179
Couriers	254
Industrial and Construction Contingent Labour	290

Council should also remain aware of both current and future procurement activities linked to these high risk categories and take appropriate actions to assess and mitigate modern slavery risks.

For these categories the following mitigation measures will be adopted.

Mitigations Measure	*Associated 'reasonable step'	Action	Target	Responsible Party
GRS Model Tender Clause – Heightened version to be used for all RFQs and RFTs.	Source	Include Model Tender Clause – Heightened in all new RFQs and RFTs	Clause included in 100% of RFQs and RFTs for new contracts	Manex
Mandatory Pass required for response to tender clause. Responses that fail will be excluded from further consideration.	Source	Evaluate all tender responses and assign pass or fail.	100% of suppliers engaged receive 'Pass'	Manex
Mandatory weighting applied to Modern Slavery Tender Clause.	Source	Apply 5% weighting to Modern Slavery Tender Clause. Clause to be evaluated using the guidance provided with the GRS Model Tender Clause. An exert of this is included in Appendix A.	100% of RFQs and RFTs for new contracts	Manex
Ensure pricing allows for staff compensation in accordance with Australian labour laws.	Source	Review pricing, against estimated working hours and staff numbers, to determine if adequate.	100% of RFQ and RFT responses	Manex
GRS Model Contract Clause – Heightened to be used for all contracts.	Source	Include Model Contract Clause for all new contracts	Clause included in 100% of new contracts	Manex
Request evidence of proper staff compensation, compliance with safe working conditions in line with Australian labor laws and completion of	Source/Manage	Review documented evidence such as payroll records, worker contracts and safety audit reports.	Documented evidence obtained and reviewed from at least 50% of suppliers	Manex

relevant training, including Work Health and Safety (WH&S) certification.	Manage	Inspection of training records and certifications.		
	Manage	Verification of workplace conditions through safety audits on Council sites and collection of worker feedback.	2 sites audited annually	Manex
Require all contractors to complete a modern slavery self-assessment questionnaire annually.	Manage	Distribute questionnaire and ensure it is completed and returned annually. Review responses and identify areas of concern. Follow up with contractors who do not respond or who indicate risks and provide support or corrective actions as required.	100 % of suppliers	Manex
Train all Council staff that conduct procurements in these categories on the procurement process they are required to follow.	Improve	Identify and train required staff in the procurement process.	100% identified staff trained.	IPM
Audit procurement process to ensure compliance for modern slavery requirements.	Improve	Review procurement process to ensure modern slavery requirements are being adhered to in supplier contracts, sourcing and procurement decisions.	2 contracts audited per year with corrective actions implemented within 90 days of audit completion.	IPM
Suppliers assessed as high risk through Council's risk assessment process (response to annual	Manage	Communicate directly with suppliers rated as high risk to assist them in developing and implementing a Corrective	100% high risk suppliers within high risk categories	Manex

modern slavery self-assessment questionnaire) – Corrective Action Plan (CAP) Implementation.		Action Plan (CAP) that is appropriate for their business based on size and capacity and the risk of harm to people within their operations. (See Appendix B for guidance)		
Flag moderate risk rated suppliers as requiring enhanced due diligence.	Manage	Request additional documentation, including payroll records, worker contracts and safety audit reports. Where applicable, also request details of subcontractors and the use of third-party labour agencies.

Assess documentation to ensure there is no indication that exploitative practices may be present. | 100% moderate risk suppliers within high risk categories | Manex |
| Respond to identified exploitative practices | Remedy | Escalate to internal risk and compliance team and investigate. Require supplier to respond formally and transparently to the findings.

Request immediate suspension of harmful practices. If this does not occur alert authorities. | 100% of occurrences | Manex |

		Ensure the affected person(s)'s safety and wellbeing is the top priority. Avoid direct questioning that could cause distress or risk their safety. Engage with a specialist support service (e.g. NSW Anti-Slavery Commissioner's Office, Red Cross Support for Trafficked People Program) for advice on next steps. If a victim is identified as being in immediate danger call 000. Work with supplier to establish a Remediation Plan. Where a supplier is not willing to cooperate and demonstrates no meaningful remediation, proceed to suspend or terminate the contract and alert authorities.		

*As defined in GRS

In high risk procurement categories where Council may be <u>contributing to</u> modern slavery risk, Council's supplier risk assessment via LGP survey identified no current suppliers that responded to the survey.

4.2.2.2   Priority 2

This priority level refers to all Council's procurement categories identified as <u>high risk</u> in IRIT, where it has been assessed that Council could be <u>directly linked</u> to the risk of modern slavery.

It is strongly recommended that Council review these risks and identify the relevant categories within its procurement processes. For example, the following categories have been flagged as high-risk based on the initial list of Council suppliers. Some categories such as construction may require further assessment to confirm their risk level.

High risk categories	Row in IRIT
Plumbing	44
Safety Equipment	537
Electrical-Instrumentation	37
Steel Supplies	47
Cleaning Supplies	180
IT Supplies	309-314
Construction – Supplies	37,39,41,43-49
Mechanical -HVAC	41
Fleet Maintenance	253

Council should also remain aware of both current and future procurement activities linked to these high-risk categories and take appropriate actions to assess and mitigate modern slavery risk.

Within LGP's survey, it includes suppliers across all three risk levels—high, medium and low—as identified in the LGP modern slavery survey.

For these categories the following mitigation measures will be adopted.

Mitigations Measure	*Associated 'reasonable step'	Action	Target	Responsible Party
GRS Model Tender Clause – Heightened version to be used for all RFQs and RFTs.	Source	Include Model Tender Clause – Heightened in all new RFQs and RFTs	Clause included in 100% of RFQs and RFTs for new contracts	Manex

Mandatory Pass required for response to tender clause. Responses that fail will be excluded from further consideration.	Source	Evaluate all tender responses and assign pass or fail.	100% of suppliers engaged receive 'Pass'	Manex
Mandatory weighting applied to Modern Slavery Tender Clause.	Source	Apply 5% weighting to Modern Slavery Tender Clause. Clause to be evaluated using the guidance provided with the GRS Model Tender Clause. An exert of this is included in Appendix A.	100% of RFQs and RFTs for new contracts	Manex
GRS Model Contract Clause – Heightened to be used for all contracts.	Source	Include Model Contract Clause for all new contracts.	Clause included in 100% of new contracts	Manex
Utilise sustainability and ethical sourcing certifications to inform procurement decisions.	Source	Include and weight criteria in RFQs and RFTs relating to relevant sustainability and ethical sourcing certifications i.e for End User Devices and Network Hardware ask if products are TCO Certified, for cleaning products ask for GECA certification.	Criteria considered for inclusion for 100% of new contracts	Manex
Flag any remaining high and moderate risk rated suppliers as requiring enhanced due diligence.	Manage	Communicate directly with suppliers and offer further assistance to help them proactively manage and reduce risks. Require suppliers to act. Monitor progress every six (6) months, and where	100% high and moderate risk suppliers	Manex

		improvements are not evident, work with the supplier to explore next steps – up to and including potential non-renewal of the contract if risks remain unaddressed.		
Require all contractors to complete a modern slavery self-assessment questionnaire annually.	Manage	Distribute questionnaire and ensure it is completed and returned annually. Review responses and identify areas of concern. Follow up with contractors who do not respond or who indicate risks and provide support or corrective actions as required.	100 % of suppliers	Manex

*As defined in GRS

In high risk procurement categories where Council may be <u>directly linked to</u> modern slavery risk, Council's supplier risk assessment via LGP survey identified three (3) current suppliers rated as medium risk and four (4) current suppliers rated as low risk. A detailed list of these suppliers is provided in the table below.

Supplier Name	ABN	Category	IRIT Risk	Could Council be causing/contributing to/directly linked to risk?	Due Diligence Required	Final rate
TRACSERV PTY LTD	95003859069	Fleet vehicles Plant - Services	High	Directly linked	Heightened	Medium
UTILEX GROUP	16633732519	Plumbing Utilities	High	Directly linked	Heightened	Medium
DATAVOICE COMMUNICATIONS (AUST)	67653190115	ICT - telecommunications	High	Directly linked	Heightened	Medium
MACQUARIE TOYOTA	98002952687	Fleet vehicles Fleet Maintenance	High	Directly linked	Heightened	Low
SIDE EFFEKT PTY LTD	24168462075	ICT - computer hardware purchase and disposal ICT - services	High	Directly linked	Heightened	Low
DELNORTH PTY LTD	26051954977	Roadside safety products - made from steel, plastic, pvc	High	Directly linked	Heightened	Low
TRILITY SOLUTIONS AUSTRALIA PTY LTD	91101568914	ICT - computer hardware	High	Directly linked	Heightened	Low

4.2.3 Light Due Diligence

According to GRS, Council is required to undertake light due diligence for procurements that have a moderate modern slavery risk level.

4.2.3.1   Priority 3

This priority level refers to all Council's procurement categories identified as <u>moderate risk</u> in <u>IRIT</u>, where it has been assessed that Council could be

contributing to or directly linked to the risk of modern slavery. It includes suppliers across all three risk levels—high, medium and low—as identified in the LGP modern slavery survey.

For this category the following mitigation measures will be adopted.

Mitigations Measure	*Associated 'reasonable step'	Action	Target	Responsible Party
GRS Model Tender Clause – Streamlined version.	Source	Include Model Tender Clause – Streamlined in all new RFQs and RFTs.	Clause included in 100% of RFQs and RFTs for new contracts	Manex
Mandatory Pass required for response to tender clause. Responses that fail will be excluded from further consideration.	Source	Evaluate all tender responses and assign pass or fail.	100% of suppliers engaged receive 'Pass'	Manex
Ensure pricing allows for staff compensation in accordance with Australian labour laws.	Source	Review pricing, against estimated working hours and staff numbers, to determine if adequate.	100% of RFQs and RFTs responses for construction services contracts	Manex
Ensure transparency of subcontractor use in construction services contracts.	Source	Include criteria in RFQs and RFTs requiring suppliers to provide details of any subcontractors that may be used to deliver the contract and how the supplier will manage any related modern slavery risks.	Criteria included in 100% of RFQs and RFTs for new construction services contracts	Manex
	Manage	Require all construction services suppliers to maintain a Subcontractor Register that includes (at least) subcontractor details, dates of engagement, type of work, no. of workers, workforce	Contractual requirement for all construction services contracts.	Manex

		demographic, safety and compliance, any identified modern slavery risks and how they are managed and details of invoices and payments.		
GRS Model Contract Clause – Streamlined version.	Manage	Include Model Contract Clause - Streamlined for all new contracts.	Clause included in 100% of new contracts	Manex
Request voluntary evidence from contractors to assess modern slavery risks associated with subcontractor use, when contracts cannot be amended to include Subcontractor Register requirement.	Manage	Request all current contracted suppliers to provide: a list of subcontractors and labour hire providers they are using on Council projects; and confirmation (including evidence) that these subcontractors are licensed and comply with labour laws.	100% of current construction suppliers	Manex

*As defined in GRS

Council's supplier risk assessment via LGP survey identified one (1) current supplier rated as medium risk and seven (7) current suppliers rated as low risk. A detailed list of these suppliers is provided in the table below.

Supplier Name	ABN	Category	IRIT Risk	Could Council be causing/contributing to/directly linked to risk?	Due Diligence Required	Final rate
DC & BC PLUNKETT	40686739303	Construction and civil works Roads, paving and concreting	Moderate	Contributing to	Light	Medium
FULTON HOGAN INDUSTRIES P/L	54000538689	Construction and civil works Roads, paving and concreting	Moderate	Contributing to	Light	Low
HOLCIM (AUSTRALIA) PTY LTD	87099732297	Roads, paving and concreting	Moderate	Directly linked	Light	Low

SUPER SEALING	22868781289	Roads, paving and concreting Bitumen Sealing	Moderate	Directly linked	Light	Low
HUMES CONCRETE PRODUCTS	87099732297	Roads, paving and concreting	Moderate	Directly linked	Light	Low
IOR AVIATION PTY LTD	60056487453	Aviation Fuel	Moderate	Directly linked	Light	Low
AGL SALES PTY LTD	88090538337	Electricity and gas utilities	Moderate	Directly linked	Light	Low
PATCHES ASPHALT	89093821213	Asphalt Supplies	Moderate	Directly linked	Light	Low

4.2.4 Minimal Due Diligence

According to GRS, Council is required to undertake minimal due diligence for procurements that have a low and minor modern slavery risk level.

4.2.4.1   Priority 4

This priority level refers to procurement categories identified as a low risk in IRIT, where it has been assessed that Council could be contributing to or directly linked to the risk of modern slavery. It includes suppliers across all three risk levels—high, medium and low—as identified in the LGP modern slavery survey.

 For these categories the following mitigation measures will be adopted.

Mitigations Measure	*Associated 'reasonable step'	Action	Target	Responsible Party
GRS Model Tender Clause – Streamlined version.	Source	Include Model Tender Clause – Streamlined in all new RFQs and RFTs	Clause included in 100% of RFQs and RFTs for new contracts	Manex
Ensure pricing allows for staff compensation in accordance with Australian labour laws.	Source	Review pricing, against estimated working hours and staff numbers, to determine if adequate.	100% of RFQ and RFT responses for service-related contracts	Manex
GRS Model Contract Clause – Streamlined version.	Manage	Include Model Contract Clause – Streamlined in all new RFQs and RFTs	Clause included in 100% of RFQs and RFTs for new contracts	Manex

Continual monitoring of existing suppliers under standard procurement procedures.	Manage	Communicate with suppliers under standard procurement procedures and request re-confirmation of adherence to Council's Supplier Code of Conduct and monitor for any changes in their operations that may elevate modern slavery risk.	Modern slavery is integrated into contract management and supplier performance review process.	Manex

*As defined in GRS

Council's supplier risk assessment via LGP survey identified two (2) current suppliers rated as medium risk and three (3) current suppliers rated as low risk. A detailed list of these suppliers is provided in the table below.

Supplier Name	ABN	Category	IRIT Risk	Could Council be causing/contributing to/directly linked to risk?	Due Diligence Required	Final rate
SPLAT PLUMBING SERVICES	82381070536	Construction and civil works Plant & equipment hire Plumbing Utilities	Low	Directly linked	Minimal	Medium
A1 TREE SERVICES (NSW) PTY LTD	32098526786	Open space supplies & maintenance, including landscaping, playgrounds, bush regeneration and arboriculture	Low	Contributing to	Minimal	Medium
ACS EQUIP PTY LTD	67161876142	Water bore maintenance	Low	Contributing to	Minimal	Low
CENTRAL WEST LINEMARKING	96628075892	Line marking services	Low	Contributing to	Minimal	Low
TYRES4U PTY LTD	51159029357	Tyre Services	Low	Contributing to	Minimal	Low

4.2.4.2 Priority 5

Council's remaining procurement categories are assessed as <u>minor</u> risk. For these categories the following mitigation measures will be adopted.

Mitigations Measure	*Associated 'reasonable step'	Action	Target	Responsible Party
GRS Model Tender Clause – Streamlined version.	Source	Include Model Tender Clause – Streamlined in all new RFQs and RFTs	Clause included in 100% of RFQs and RFTs for new contracts	Manex
GRS Model Contract Clause – Streamlined version.	Manage	Include Model Contract Clause – Streamlined in all new RFQs and RFTs	Clause included in 100% of RFQs and RFTs for new contracts	Manex

*As defined in GRS

Council's supplier risk assessment via LGP survey identified two (2) current suppliers rated as medium risk and thirteen (13) current suppliers rated as low risk. A detailed list of these suppliers is provided in the table below.

Supplier Name	ABN	Category	IRIT Risk	Could Council be causing/contributing to/directly linked to risk?	Due Diligence Required	Final rate
MLB CONCRETE & CONSTRUCTION	98164797648	Construction and civil works Plant & equipment hire	Minor	Directly linked	Minimal	Medium
BURTON ENVIRONMENTAL	37919585156	Professional services Environmental Consulting (sole trader 1 employee)	Minor	Contributing to	Minimal	Medium
ROLLERS AUSTRALIA PTY LIMITED	50087309091	Plant & equipment hire	Minor	Directly linked	Minimal	Low
DWYERS TRANSPORT	44003454591	Plant & equipment hire	Minor	Directly linked	Minimal	Low
STATECOVER MUTUAL LIMITED	36090394755	Insurance and WHS services	Minor	Contributing to	Minimal	Low
NEILL EARTHMOVING	89064536974	Construction and civil works Plant & equipment hire Quarry Operations	Minor	Directly linked	Minimal	Low

BUILT ENVIRONMENT COLLECTIVE	22152885393	Professional services	Minor	Contributing to	Minimal	Low
RYAN MASON ENGINEERING	26083171055	ENGINEERING SERVICES - FABRICATION	Minor	Contributing to	Minimal	Low
LANGFORD & ROWE CONSULTING SURVEYORS PTY	34131828665	Surveying	Minor	Contributing to	Minimal	Low
COATES HIRES OPERATIONS P/L	99074126971	Dry Hire of plant and equipment	Minor	Directly linked	Minimal	Low
WATCHOUT TRAFFIC CONTROL	20112866001	Traffic Control	Minor	Contributing to	Minimal	Low
BARNSON PTY LTD	43088342625	Design Consultant	Minor	Contributing to	Minimal	Low
WESTRAC EQUIPMENT PTY LTD	63009342572	Plant Sales and Repairs	Minor	Directly linked	Minimal	Low
CT MANAGEMENT GROUP PTY LTD	15072083795	Professional consulting	Minor	Contributing to	Minimal	Low
WORKFORCE ROAD SERVICES	36136999374	Traffic control	Minor	Contributing to	Minimal	Low

4.2.4.3   Priority 5

This section presents a list of suppliers, along with their associated procurement categories, that have been flagged for further assessment based on Product (Authoritative Determinations) Vulnerable Populations Supply Chain Model Regulatory Context recommended by the IRIT tool. These suppliers fall within categories that often involve both labour and materials that are exposed to varying levels of modern slavery risk.

To strengthen risk evaluation, we recommend that Council undertakes an additional round of due diligence. This would include utilising the GRS resource _Modern Slavery Risks in Construction: An Overview_ to assist in identifying and assessing the level of risk associated with each individual procurement activity. It may also include reviewing publicly available information—such as company websites, sustainability reports, or corporate disclosures—as well as collecting direct information from suppliers through primary engagement.

This process can help clarify whether these suppliers are involved in other high risk categories not previously captured and support more accurate risk classification going forward.

Supplier Name	ABN	Category	IRIT Risk	Could Council be causing/contributing to/directly linked to risk?	Final rate
CONSETH SOLUTIONS PTY LTD	59640389788	Construction and civil works Professional services	Further Assessment	Contributing to	Medium
PRECISION CIVIL INFRASTRUCTURE	16097107956	Construction and civil works	Further Assessment	Directly linked	Medium
DOWNER EDI WORKS PTY LTD	66008709608	Construction	Further Assessment	Directly linked	Low
QMAX PUMPING SYSTEMS PTY LTD	95164437914	Mechanical	Further Assessment	Contributing to	Low
RDO EQUIPMENT PTY LTD	58060286759	Electrical & mechanical services Construction & Agricultural Equipment	Further Assessment	Contributing to	Low
WESTTECH INDUSTRIAL CONTROLS PTY LTD	82633444434	Electrical & mechanical equipment – other (including lighting and audio/visual)	Further Assessment	Directly linked	Low
LANDMARK PRODUCTS PTY LTD	99112000843	Construction and civil works	Further Assessment	Directly linked	Low
BRD DESIGN & CONSTRUCTION PTY LTD	71147454984	Construction and civil works	Further Assessment	Directly linked	Low
MODUS AUSTRALIA	53147987095	Construction and civil works - manufacture, supply and construct	Further Assessment	Directly linked	Low
THE TRUSTEE OF CENTRAL INDUSTRIES TRUST	18384018924	Construction and civil works	Further Assessment	Directly linked	Low

| PLAY PARKS | 37859250238 | Play equipment supplies – various materials | Further Assessment | Directly linked | Low |
| IXOM OPERATIONS PTY LTD | 51600546512 | Water treatment chemicals and infrastructure | Further Assessment | Directly linked | Low |

4.3   Measuring Targets and Identifying Challenges

The effectiveness of this Modern Slavery Risk Management Plan will be assessed through a structured monitoring and evaluation approach. Measurement will occur as follows:

- **Implementation Timeframe:**
  Measurement activities will begin following adoption of the Plan and continue on an ongoing basis as part of regular procurement and contract management processes.

- **Measurement Frequency:**
  Progress will be reviewed annually, in alignment with Council's broader reporting and governance cycles. Additional interim reviews may be undertaken as required, particularly in response to identified risks, supplier non-compliance, or changes in legislative requirements.

Council recognises that identifying and addressing modern slavery risks is a complex and evolving process. The ability to effectively measure progress may be influenced by several challenges, including:

- Limited visibility in complex supply chains, particularly beyond Tier 1 suppliers.
- Supplier capacity and engagement limitations, especially among small or regional suppliers with limited resources or awareness.
- Inconsistent or incomplete data, which can impact the ability to assess and compare performance across procurement categories.
- Changing legislative and regulatory requirements, which may require regular updates to processes, tools and training.

Measurement activities will be reviewed and refined over time to incorporate emerging best practices and to respond to challenges identified during implementation.

Council is committed to a process of continuous improvement. Insights gained through ongoing measurement will inform future updates to this Plan and associated procedures, strengthening Council's overall approach to modern slavery risk management.

5   Roles and Responsibilities

While specific responsibilities for each target are detailed throughout the Plan, the following outlines key roles in the overall implementation and oversight of the Modern Slavery Risk Management Plan:

- **Executive Leadership Team** – Provide strategic oversight, approve and adopt the Plan and allocate necessary resources.

- **Procurement Team** – Lead the implementation of the Plan within procurement processes, including risk assessment, supplier engagement, contract management, and data collection for reporting.

- **Contract Managers** – Apply modern slavery risk controls during procurement planning and contract management. Work with Procurement to monitor supplier performance and address any concerns.

- **Governance / Risk / Compliance** – Support procurement in ensuring alignment with legal and Policy requirements and assist with risk monitoring and reporting.

- **Suppliers** – Comply with contractual obligations and participate in due diligence processes.

- **All Staff involved in procurement** – Understand and apply modern slavery risk considerations in procurement activities and report any identified risks or concerns.

6 Review

Manex will review this Plan annually, and update it as needed. Additional reviews and updates may occur at any time in response to changes in legislative and regulatory requirements.

Appendix A

Evaluation Guidance for Heightened modern slavery due diligence procurements

This evaluation guidance has been sourced from the Guidance on Reasonable Steps (GRS) Model Tender Clause for heightened due diligence.

Requirement	
The Tender will be evaluated with reference to whether it has demonstrated that it is capable of taking reasonable steps to identify, assess and address Modern Slavery in its operations and supply chain and ensure compliance with Modern Slavery Laws. **Has the Tenderer demonstrated that it is capable of taking reasonable steps to identify, assess and address Modern Slavery in its operations and supply chain and ensure compliance with Modern Slavery Laws?**	
Assessment against the evaluation criteria	*Score*
Excellent: the response exceeds what is expected for the modern slavery criteria. The response therefore shows: - Excellent understanding of the reasonable steps required to identify, assess and address Modern Slavery in its operations and supply chain and ensure compliance with Modern Slavery Laws. - Demonstrated through relevant and thorough evidence. - The response also proposes additional value above that expected.	5
Very good: meets the modern slavery criteria to a high standard. The response therefore shows: - Very good understanding of the reasonable steps required to identify, assess and address Modern Slavery in its operations and supply chain and ensure compliance with Modern Slavery Laws. - Demonstrated through relevant evidence.	4
Good: meets the modern slavery criteria to a good standard. The response therefore shows: - Good understanding of the reasonable steps required to identify, assess and address Modern Slavery in its operations and supply chain and ensure compliance with Modern Slavery Laws. - Demonstrated through some evidence, but evidence lacking in some areas.	3
Fair: meets the modern slavery criteria to a fair standard. The response therefore shows: - Fair understanding of the reasonable steps required to identify, assess and address Modern Slavery in its operations and supply chain and ensure compliance with Modern Slavery Laws. - Demonstrated through minimal evidence, with evidence lacking in some areas.	2

Requirement	
Poor: partially addresses the modern slavery criteria, with obvious deficiencies The response therefore shows: - Minimal or low understanding of the reasonable steps required to identify, assess and address Modern Slavery in its operations and supply chain and ensure compliance with Modern Slavery Laws. - Minimal or low relevant evidence.	1
Fail: non response or complete failure to address the modern slavery criteria.	0

Use of Third-Party Certifications in Evaluation

Council may consider the use of third-party certifications as a valuable tool to verify compliance and ensure responsible practices within the supply chain. Third-party certifications provide independent, objective verification of a supplier's commitment to ethical practices and human rights, including the prevention of modern slavery.

Examples of certifications addressing modern slavery:

Certification	Relevant Products / categories	Description
Ethical Trading Initiative (ETI) Base Code	consumer goods, apparel, electronics, and food products	The ETI Base Code covers ethical labour practices and is used globally to ensure that suppliers uphold labour rights, including the elimination of forced and child labour.
Fair Trade Certification	agricultural products, textiles, and handicrafts	Fair Trade Certification ensures ethical sourcing of raw materials such as coffee, tea, cocoa, textiles, and artisan goods, addressing issues like forced labour, fair wages, and equitable working conditions.

SA8000 (Social Accountability International)	manufacturing, textiles, electronics, and construction	SA8000 sets standards for workplace conditions, including the prohibition of forced labour and child labour and ensures fair treatment and safe working environments for workers
Global Organic Textile Standard (GOTS)	textiles and apparel	GOTS is focused on organic textile products and also includes social criteria ensuring that labour conditions meet ethical standards. This includes prohibiting modern slavery in the production of organic cotton, wool and other textiles.
TCO Certified	electronics, ICT hardware, and technology products	TCO Certified is a certification for products like computers, monitors and other ICT hardware that ensures ethical manufacturing and labour practices throughout the product's lifecycle. It includes social responsibility criteria that address modern slavery risks, including working conditions, worker rights and compliance with labour laws in manufacturing environments. TCO Certified helps guarantee that products are sourced and produced in compliance with international labour standards
GECA (Good Environmental Choice Australia)	cleaning products, furniture, building and construction products, electronics and ICT hardware	GECA is an Australian certification that focuses on ensuring environmental sustainability, ethical labour practices and fair working conditions. While primarily an environmental certification, GECA's standards also incorporate social responsibility elements, such as adherence to fair working conditions and modern slavery prevention.
Sedex Members Ethical Trade Audit (SMETA)	consumer goods, apparel, food production, and electronics	SMETA is a widely adopted audit framework for assessing suppliers against ethical standards, including modern slavery, child labour, health and safety and working conditions. It is relevant across many procurement categories, particularly in industries with complex supply chains

Amfori BSCI (Business Social Compliance Initiative)	retail, manufacturing, agriculture, and electronics	Amfori BSCI is a platform focused on improving social performance and ethical labour practices. It is particularly relevant for procurement categories like consumer goods, apparel and electronics, ensuring that suppliers adhere to modern slavery standards.

Appendix B

Guidance for Preparing a Corrective Action Plan (CAP)

For Small, Medium, and Large Businesses

This guidance outlines what to include in a Corrective Action Plan (CAP) when modern slavery risks are identified in your organisation or supply chain. A CAP demonstrates your commitment to ethical practices and outlines practical steps to address any gaps.

1. Awareness and Education

Objective: Ensure your organisation and supply chain understand modern slavery risks and legal obligations.

All Businesses Should:
- Educate staff on modern slavery and their responsibilities.
- Include modern slavery information in onboarding and induction.
- Communicate expectations to Tier 1 suppliers.

Larger Businesses:
- Establish structured awareness campaigns and internal communication plans.
- Include modern slavery content in employee learning systems and regular compliance updates.

SMEs:
- Use materials like fact sheets or short videos. Relevant resources could be sourced from the [NSW Small Business Commissioner](#), [Australian Government](#), [Australian Red Cross](#) or [Local Government Procurement](#).
- Focus on raising awareness through toolbox talks or short team meetings.

2. Policy Development and Review

Objective: Establish clear policies that demonstrate a commitment to human rights, ethical sourcing, and fair work.

All Businesses Should:
- Develop and regularly update policies covering:
  - Human rights and labour practices
  - Ethical sourcing
  - Fair employment and payment
- Implement or update a Supplier Code of Conduct aligned with modern slavery expectations.

Larger Businesses:
- Ensure alignment with ESG frameworks and global standards (e.g. United Nations Guiding Principles on Business and Human Rights (UNGPs), the International Labour Organisation (ILO)).
- Embed policy compliance into contract terms and audit procedures.

SMEs:
- Focus on simple, clear policies and ensure they're communicated to staff and suppliers.

- Use available templates where resources are limited.

3. Risk Assessment and Management – Internal Operations

Objective: Identify and mitigate risks of modern slavery within your own workforce.

All Businesses Should:
- Assess internal risks such as labour hire, low-skilled roles or vulnerable worker groups.
- Establish confidential reporting channels.
- Promote a culture of fair pay, lawful employment and safe conditions.

Larger Businesses:
- Conduct formal internal risk assessments and workplace audits.
- Use data analytics or HR dashboards to flag potential issues.

SMEs:
- Conduct informal surveys or team check-ins.
- Use simple checklists to review practices like pay, visas and working hours.

4. Risk Assessment and Management – Supply Chain

Objective: Understand and reduce modern slavery risks across your supply chain.

All Businesses Should:
- Assess Tier 1 suppliers for risk based on sector, geography and labour practices.
- Request documentation such as policies, training records or audit results.
- Track and document any corrective actions.

Larger Businesses:
- Map the full supply chain beyond Tier 1 (where feasible).
- Engage in third-party audits or certifications for high risk suppliers.
- Implement risk-based supplier due diligence systems.

SMEs:
- Focus on Tier 1 supplier relationships.
- Ask key suppliers basic risk questions (e.g. use of subcontractors, sourcing locations).
- Use supplier declarations or adapted checklists.

5. Labour Verification and Subcontractor Oversight

Objective: Ensure all subcontractors and labour providers are operating lawfully and ethically.

All Businesses Should:
- Verify the right to work for all subcontracted or labour-hire staff.
- Include fair work expectations in all labour agreements.
- Apply your Supplier Code of Conduct to all external labour.

Larger Businesses:
- Require labour providers to report regularly on compliance (e.g. timesheets, visa checks).
- Use formal onboarding or compliance checks for subcontractors.

SMEs:
- Request and retain copies of key documentation (e.g. visa or ID).
- Limit use of unknown or high risk labour hire sources.

6. Training and Capability Building

Objective: Strengthen the ability of your workforce and suppliers to identify and respond to modern slavery risks.

All Businesses Should:
- Provide basic training to all relevant staff (e.g. procurement, HR, site managers).
- Offer information or awareness sessions to suppliers.

Larger Businesses:
- Deliver structured training programs (e.g. eLearning, webinars).
- Evaluate effectiveness through assessments or feedback surveys.

SMEs:
- Use simple online tools, videos or checklists.
- Seek free or low-cost training options (e.g. from NSW Small Business Commissioner, Australian Government, Australian Red Cross or Local Government Procurement).

What to Include in Your Corrective Action Plan (CAP)

Every CAP should clearly outline:

Section	What to Include
1. Summary of Identified Risks	Describe the risks found in your operations or supply chain.
2. Corrective Actions	Detail the actions you will take, who is responsible and the timeframes.
3. Monitoring and Reporting	Explain how you will track progress and ensure actions are completed.
4. Supporting Documents *(Optional)*	Attach policies, supplier responses, training records or other relevant materials.
5. Commitment Statement	A short statement signed by senior leadership confirming your commitment.