



# MODERN SLAVERY STATEMENT

2023



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# A Message from ASC

On behalf of ASC Pty Ltd (ASC), we are pleased to endorse the company's 2023 Modern Slavery Statement. This document charts the progress of ASC's Modern Slavery Three-Year Risk Management Implementation Plan (2023-25), including this period's focus on continuous improvement.

ASC's Modern Slavery Working Group (MSWG) developed its 2023-25 plan to support and strengthen ASC's commitment to identifying, mitigating and eliminating modern slavery from its operations and supply chain.

Highlights for the 2022-23 financial year (FY 2022-23) included implementation of its Supply Chain Intelligence tool, which allows ASC to enhance its risk assessment by providing increased visibility of Tier 2 suppliers, and provides capability to track external developments within ASC's supply chain through media monitoring.


ASC's modern slavery response is informed by its broader mission, vision, and core PRIDE values: Protect, Respect, Integrity, Discipline and Excellence.

This Statement was approved by the ASC Board on 13 December 2023.



Bruce Carter

CHAIR



Stuart Whiley

MANAGING DIRECTOR AND  
CHIEF EXECUTIVE OFFICER

# About this Statement

This Modern Slavery Statement is made by ASC as a joint Statement under the *Modern Slavery Act 2018* (the Act), for FY 2022-23. To assist readers, the format of this Statement follows the requirements of the Act. Annexure 1 on page 20 of this Statement maps the sections of the Statement against the requirements of the Act.

## Scope

This Statement describes the efforts and measures taken by ASC in relation to its operations and supply chain. These reflect improvements and advances ASC has made since the introduction of the Act and since issuing our Statements for financial years 2019-20, 2020-21, and 2021-22. It also outlines the company's plans for continuous improvement across future reporting periods. ASC's efforts are informed by evidence-based modern slavery risk identification and remediation.

# Highlights - FY 2022-23



## Strategic Pillars

### Corporate Governance

Renewal of ASC's Modern Slavery Three-Year Risk Management Implementation Plan for 2023-25.

### Policies and Procedures

Review of ASC's policies and procedures to determine compliance with regulatory and stakeholder expectations.

### Due Diligence

Commenced implementation of a Supply Chain Intelligence tool, to expand ASC's understanding of current and upstream supplier risk.

### Monitoring and Reporting

Met all key performance indicator (KPI) targets.

# About ASC

ASC has served as Australia’s submarine builder and sustainer for more than 35 years. ASC built the Collins Class submarines and now sustains the fleet in Osborne, South Australia and Henderson, Western Australia. Supported by its predominantly Australian supply chain and highly skilled workforce, the company delivers submarine capability and availability to the Royal Australian Navy (RAN).

## Organisational Structure

ASC is a proprietary company limited by shares registered under the Corporations Act 2001 and is subject to the *Public Governance, Performance and Accountability Act 2013*. All ASC share capital is owned by the Commonwealth of Australia (CoA), represented by the Department of Finance. ASC is a Government Business Enterprise (GBE) pursuant to s. 5(2) (a) of the *Public Governance, Performance and Accountability Rule 2014*.

ASC has two active wholly Australian Government-owned subsidiaries (ASC AWD Shipbuilder Pty Ltd and ASC OPV Shipbuilder Pty Ltd) and two dormant subsidiaries (Deep Blue Tech Pty Ltd and ASC Modules Pty Ltd). ASC’s Executive Team and Board manage and govern ASC, including all subsidiaries.

## Consultation:

ASC operates and is managed as an integrated group with overarching policies, systems and processes that are designed to be consistently applied across our operated assets and functions.

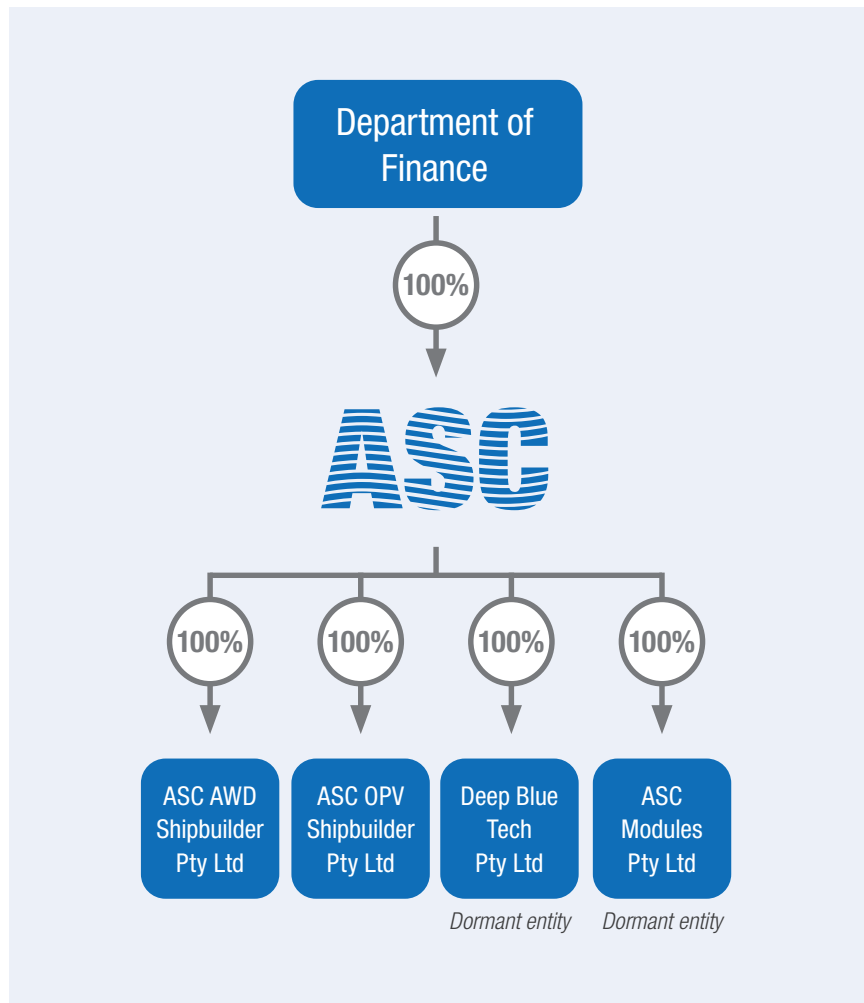


Figure 1: ASC Group structure.

By virtue of ASC’s centralised management structure, the consultation process for developing the Modern Slavery Statement included all active subsidiaries. ASC continues to take an interdisciplinary approach to modern slavery reporting. In FY 2022-23, ASC’s MSWG continued to include key representatives from Legal, People and Culture, Supply Chain, Security, Operations, and Internal Communications

to ensure a cross-functional view.

The MSWG, ASC Legal, Executive Manager Supply Chain, Executive Manager People and Culture, and the Managing Director and Chief Executive Officer, reviewed the Statement representing a broad range of internal and external stakeholders.

**Vision:** To be Australia’s sovereign submarine builder and maintainer – integral in delivering our nation’s maritime strategy.

**Mission:** To be a trusted and efficient partner with sovereign design, build and sustainment capabilities, driving best value for our customers.

## Operations and People

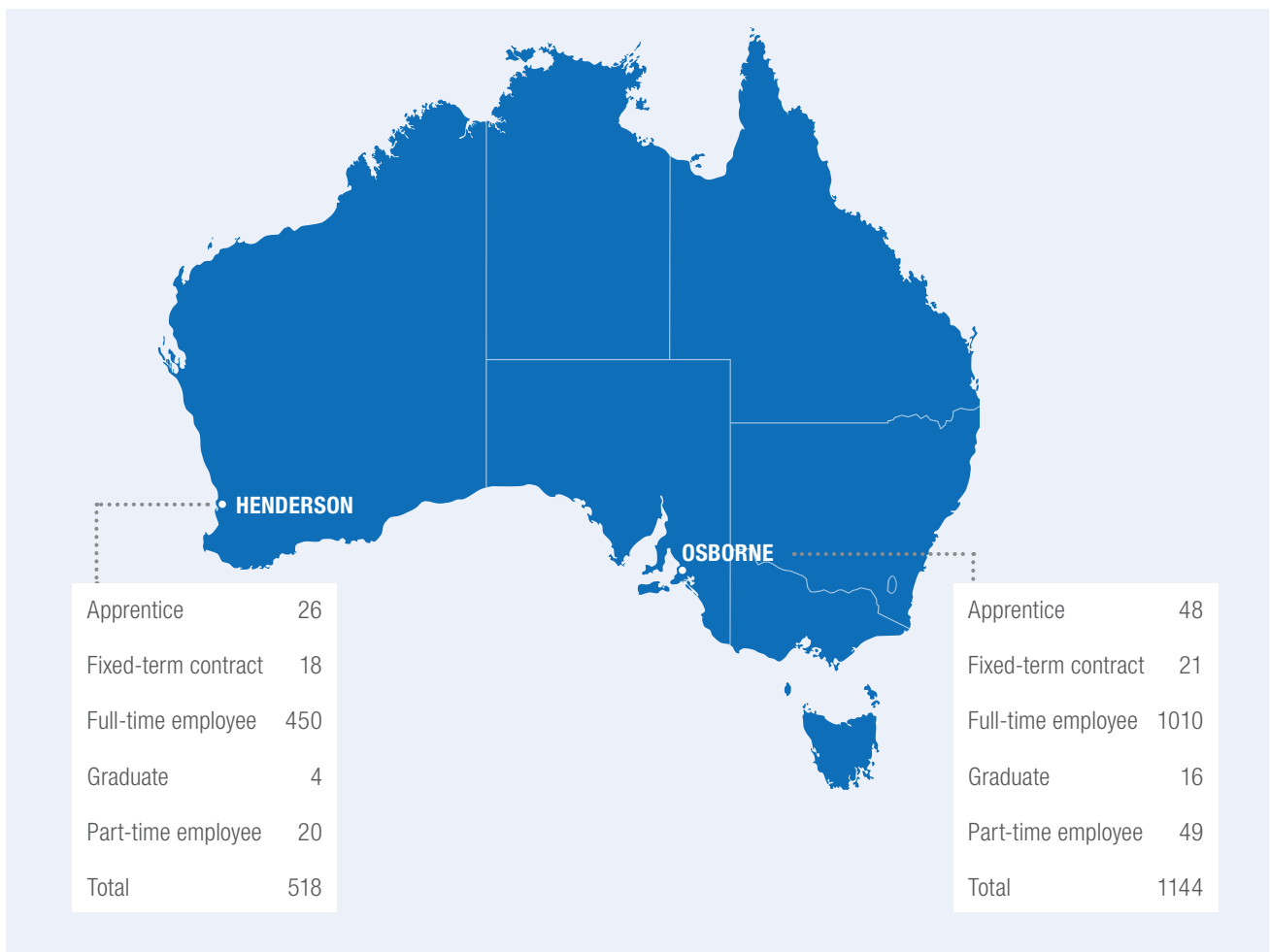


Figure 2: ASC's workforce as at 30 June 2023.

ASC's workforce of more than 1,900 employees is located at ASC's sites in Osborne and Port Adelaide, South Australia and Henderson, Bibra Lake and Garden Island, Western Australia. At 30 June 2023, approximately 97% of employees were permanently employed<sup>1</sup>, around 2% were on fixed-term contracts and the remainder were casual, with 0.4% of ASC's apprentices under 18 years of age.

During FY 2022-23 ASC continued its contract with the Australian Government to support the Sovereign Shipbuilding Talent Pool to retain, grow and develop

the shipbuilding workforce in Australia. This resulted in an increase of 71 new employees by 30 June 2023.

### Supply Chain

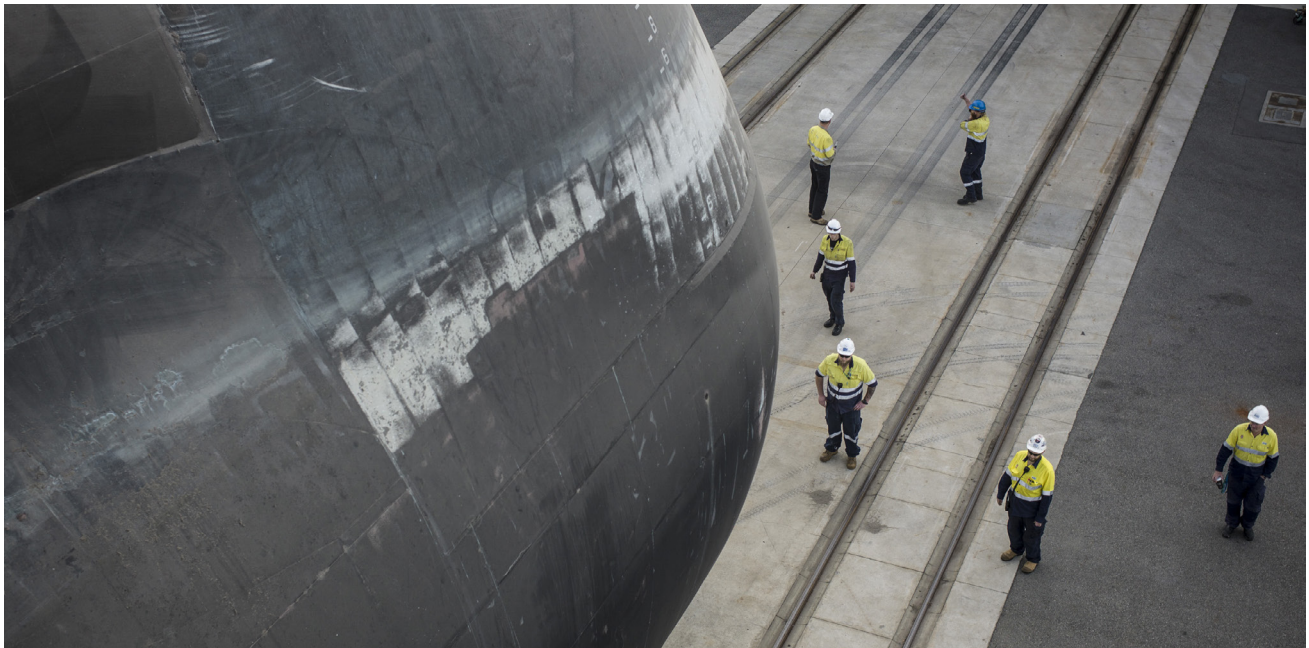
ASC manages the largest and most complex supply chain operation ever required by the RAN. ASC is integral to Australia's sovereign naval industrial capability through its partnerships, supply chain excellence and high levels of Australian industry content. Over 90% of its suppliers are domestic businesses. ASC is committed to maximising

Australian industry participation to enhance the nation's sovereign submarine capability.

ASC's supply chain includes a diverse range of suppliers spanning numerous sectors. During the reporting period, ASC's total supplier spend was \$392.38 million across 873 suppliers. The majority of its direct, or "Tier 1", suppliers are located in Australia, Europe and North America.

<sup>1</sup> This number includes full-time and part-time employees.

# Modern Slavery Risks



ASC's central role in the Australian naval shipbuilding and sustainment supply chain provides the opportunity to influence and drive action to identify and address modern slavery risks throughout the industry.

## Operations

The nature of ASC's work requires a highly skilled workforce. ASC's employees are located in Australia and perform a wide range of roles, including engineering, operations, program management, supply chain and corporate services.

ASC conducted a risk assessment in FY 2019-20 and found these roles to be at low risk of modern slavery, in consideration of the company's mature human resource policies, systems and procedures. This remained unchanged in FY 2022-23.

## Supply Chain

The majority of ASC's direct, Tier 1 suppliers are located in Australia, with the remaining supply relationships located across Europe, North America and Asia. The main supply categories include defence equipment; machinery and industrial manufacturing; distributors; professional services; transport and logistics; and human resource and employment services. In FY 2022-23, no significant changes in country or category risk impacted ASC's supply base.

In November 2023, ASC reflected on its modern slavery risk via a risk assessment of Tier 1 suppliers with which ASC had associated spend in the reporting period. This process considered geographic and industry risk factors to identify risk profiles of Tier 1 Suppliers, using global country risk standards, and industry risk categories based on the Global Industry Classification Standards. The assessment output generates one of four overall risk profiles: Low Risk, Medium Risk, High Risk or Very High Risk.

In FY 2022-23:

- ASC engaged over 800 Tier 1 suppliers in 15 countries, with over 90% based in Australia.
- The majority of suppliers have an inherent medium-risk rating. This reflects the higher risk inherent to their industries, as most suppliers are based in Australia, Europe and North America, which are geographical areas with lower modern slavery risks.
- Suppliers with a medium-risk rating represented 74% ASC's total annual procurement expenditure.
- ASC established relationships with 79 new suppliers, of which about 60% were assessed to have an inherent low-risk rating. More than 95% (76) of these new suppliers are located in Australia, with the remainder spread across Sweden, France and Singapore.



## Changes to supplier risk profiles

The methodology for ASC's fourth annual modern slavery risk assessment to identify inherent Tier 1 supplier risks was updated to include a wider range of human rights databases, a more comprehensive country risk profile and revised industry classifications. This methodology change, together with ASC's FY 2022-23 operational requirements, resulted in the following industries being identified as carrying the highest inherent modern slavery risks:





- Commercial Cleaning
- Containers and Packaging
- Electrical Equipment
- Electronic Equipment, Instruments and Components
- Machinery and Industrial Manufacturing
- Textiles and Apparel.





### TIER 1 SUPPLIER RISK ASSESSMENT FY 2022-23: KEY POINTS

**3.4%** of suppliers were assessed as high-risk. In this subset, 77% of these suppliers represented a low procurement spend, and 23% represented a medium or medium/high spend.

**93%** of ASC's high-risk suppliers are located in Australia. Though Australia's country risk profile is low, the inherent risk in the categories of goods and services provided drives the risk rating.

**Top 10 suppliers** by spend account for approximately \$207M of total procurement spend. Eight of these suppliers were identified as medium-risk and none presented a high risk.

ALL SUPPLIERS		
INHERENT RISK CATEGORY	#	% OF SUPPLIERS
 Very High	0	0%
 High	30	3%
 Medium	479	55%
 Low	364	42%

NEW SUPPLIERS IN 2022-23		
INHERENT RISK CATEGORY	#	% OF NEW SUPPLIERS
 Very High	0	0%
 High	1	1%
 Medium	31	39%
 Low	47	60%

The inherent modern slavery risk is medium for the majority of ASC's predominantly Australia-based Tier 1 suppliers, but can be high in the categories of goods and services they provide, either due to the industry they operate in, or their supply chains.

ASC continues to explore avenues to increase effectiveness of controls to minimise the likelihood of contributing to exploitative practices within its supply chain.

Table 1 sets out high-risk ASC suppliers' procurement categories, the Tier 1 countries ASC sources from and the likely indicators driving their risk rating.

CATEGORY	TIER 1 SOURCING COUNTRIES	INDICATORS OF INHERENT RISK
Commercial Cleaning	Australia	There is a high risk of forced labour, labour exploitation and human trafficking in the commercial cleaning sector. This risk is exacerbated due to complex and multilayered subcontracting used in the sector, where often providers are from locations with lower labour standards and costs. This may pose challenges in monitoring workforce management and potential higher-risk practices, such as further outsourcing or labour-hire.
Containers and Packaging	Australia	The containers and packaging industry is at a higher risk of labour exploitation. Increasingly, production has shifted to countries with fewer industry regulations, and/or poor governance and implementation, elevating workers' risk of exposure to hazardous working conditions. This is exacerbated by the increasing demand and pressure to produce cheaper goods that drives precarious conditions.
Electronic Equipment, Instruments and Components, and Electrical Equipment	Singapore/ Italy/USA/ Australia	The electronics and electrical manufacturing industry has been linked with numerous instances of labour exploitation. These present throughout complex supply chains, making mitigation difficult – everywhere from the mining of raw minerals to the manufacture of finished products. The industry is at higher risk of forced labour and human trafficking throughout its supply chain, including the use of migrant labour, particularly in countries like China and Malaysia where electronics are largely produced.
Textiles and Apparel	Australia	There are high risks related to the apparel and textile manufacturing industry, including forced and child labour, and human trafficking. The sector's supply chain complexity reduces the visibility of issues within it, everywhere from animal and cotton farming to the weaving, dying and manufacturing of apparel. Cotton and leather are typically produced in areas with high modern slavery risks, like China and Brazil. These countries are associated with a high risk of forced labour. The apparel and textile industry is highly labour intensive, with disproportionate numbers of low-skilled and migrant workers who may not have the knowledge and/or bargaining power to speak up and demand their human rights be upheld. Low-skilled and migrant workers are frequently exposed to excessive working hours, underpayment and poor working conditions.
Machinery and Industrial Manufacturing	USA	There are numerous instances of labour exploitation in the machinery and industrial manufacturing industry. Workers face hazardous working conditions through exposure to extreme and hazardous working environments and chemicals and through operating dangerous machinery. High levels of subcontracting within the sector, which increases the risk of human trafficking and exploitation, exacerbates this.

Table 1: High-risk ASC suppliers' procurement categories, Tier 1 sourcing countries and inherent-risk indicators.

# ASC's Approach

ASC is committed to the eradication of modern slavery in its operations and supply chain. ASC's approach is underpinned by its PRIDE values – Protect, Respect, Integrity, Discipline and Excellence – and guided by ASC's four strategic pillars of Modern Slavery Risk Management, which have been translated into an actionable three-year plan.



Figure 3: ASC's modern slavery commitment, strategic pillars and PRIDE values.

## Modern Slavery Risk Management Implementation Plan

In 2022, ASC successfully completed its first three-year Modern Slavery Risk Management Implementation Plan (2020-22). The company's 2023-25 Plan builds on this foundation to embed ASC's commitment to a tangible framework. Table 2 details a list of activities ASC has committed to for the 2023-25 timeframe with current progress.

ACTIVITIES	TIMELINE	PROGRESS
<ul style="list-style-type: none"> <li>Draft and submit an annual Modern Slavery Statement to the Australian Border Force each year.</li> </ul>	31 December annually	On track
<ul style="list-style-type: none"> <li>Continuously review and enhance policies relating to ASC's modern slavery risk.</li> <li>Annually review and update modern slavery KPIs.</li> </ul>	Ongoing	On track
<ul style="list-style-type: none"> <li>Continuously review and enhance ASC's procedures and processes relating to modern slavery.</li> <li>Continuously review and enhance ASC's contract and purchase order templates with regard to modern slavery obligations.</li> </ul>	Ongoing	On track
<ul style="list-style-type: none"> <li>Complete annual modern slavery risk assessments for ASC operations, including onsite contractors.</li> <li>Develop an action plan to monitor risk mitigation activities following risk assessments.</li> <li>Develop a trend analysis report to track ongoing category/country modern slavery risk.</li> </ul>	Annually	On track
<ul style="list-style-type: none"> <li>Raise ASC employees' awareness of modern slavery risks through an annual training module, with targeted training for supply chain personnel.</li> <li>Investigate potential partnerships with industry groups.</li> </ul>	Ongoing	On track

Table 2: ASC's risk management activities committed to for 2023-25 and current progress.

# Commitment and Governance

## Governance

ASC has established a robust governance structure to oversee modern slavery risk management across its operations and supply chain. This structure defines the roles and relationships between ASC's shareholder, the CoA (represented by Department of Finance); Board; Executive; employees; and supply partners.

The following ASC committees are responsible for assessing and managing modern slavery risks:

### The Business Assurance and Security Committee (BASC)

is responsible for assessing ASC management's approach to minimising and managing exposure to all areas of material business risks, including modern slavery. The committee met twice in the reporting period.

### The Human Resources and Remuneration Committee (HRRC)

assists the Board to fulfil its corporate governance and oversight. This includes performance measurements and accountability frameworks; recruitment and retention; talent management and succession planning; and remuneration components. The HRRC met five times in the reporting period.

### The Executive Safety and Environment (ESE) Council

is responsible for reviewing ASC's strategies, policies, risk exposure, targets and performance. Where appropriate, it reviews our suppliers' and contractors' work health and safety and environmental sustainability. The ESE Council met four times in the reporting period.

**The MSWG** operates across departments and is sponsored by two ASC Executive Managers. The MSWG provides

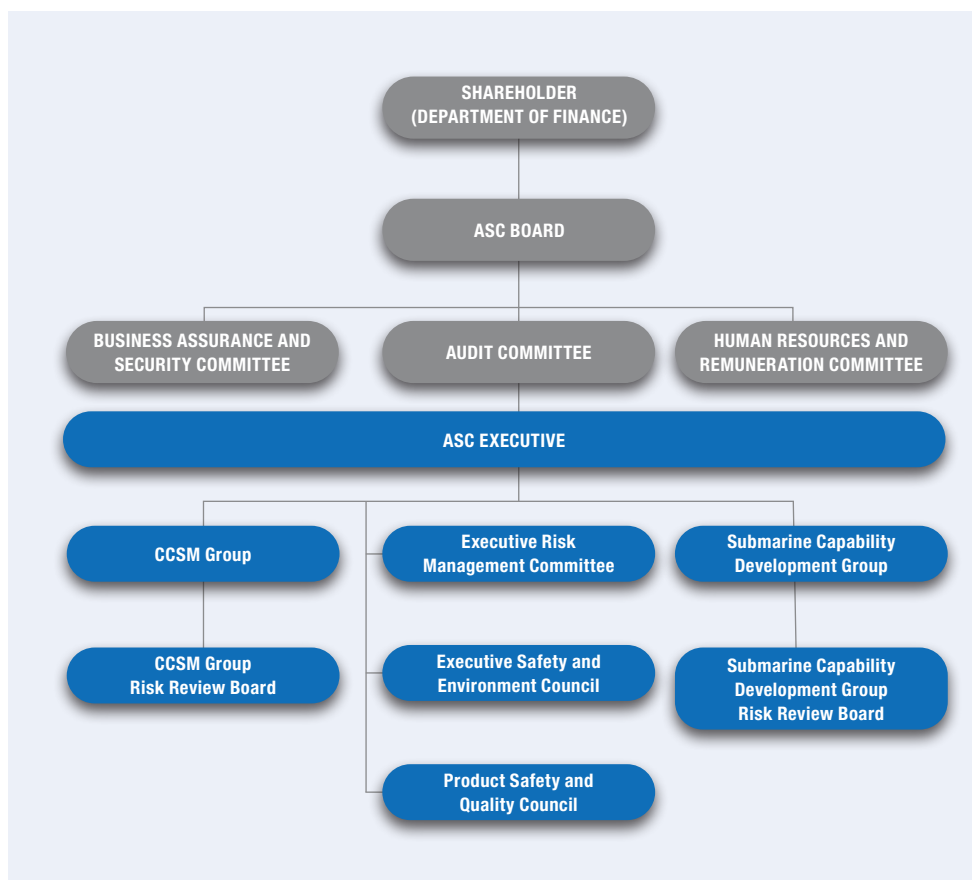


Figure 4: ASC's modern slavery governance structure.

governance and leadership to deliver ASC's modern slavery commitments, including:

- implementing its modern slavery compliance framework to identify, address and remediate modern slavery risk;
- overseeing the development of ASC's annual Modern Slavery Statement;
- tracking implementation of ASC's current Modern Slavery Three-Year Risk Management Implementation Plan;
- planning to improve ASC's systems, processes and controls;
- developing and delivering an ongoing system of education to build awareness of modern slavery across ASC's Board, Executive, staff and suppliers; and
- providing regular progress reports to the Executive and Board.

The MSWG met four times in the reporting period.

# Policies and Procedures

ASC has established formal codes of conduct for employees and suppliers. ASC regularly reviews its Modern Slavery Process, Whistleblower Protection Process, Supply Chain Policy and Procurement Manual and Guide to align with regulatory requirements and ASC's values. Updates are made when required.

POLICY/PROCESS	ASC	SUPPLIERS	PURPOSE
<b>Modern Slavery Process</b>	✓	✓	Describes ASC's commitments with respect to the Act; what it is doing to manage modern slavery risk; and how it will identify, report, investigate and remediate instances of modern slavery.
<b>ASC Code of Conduct</b>	✓		Articulates the high standards of honesty, integrity, ethical and law-abiding behaviour expected of ASC's directors, employees and contractors.
<b>Supplier Code of Conduct</b>		✓	Outlines expected supplier behavioural standards in relation to ASC's values; labour and human rights, including compliance with the Act; health and safety; environment and community; and confidentiality.
<b>Anti-Fraud Process and Fraud and Corruption Control Framework</b>	✓	✓	Outlines ASC's commitment and approach to complying with laws and regulations addressing fraud, bribery and corruption that can facilitate slavery and other forms of exploitation in the value chain.
<b>Whistleblower Protection Process</b>	✓	✓	Ensures any ASC employee disclosing a contravention of the law, including the Act, can do so without fear of reprisal, and with certainty of fair and confidential treatment.
<b>Risk Management Framework</b>	✓		Includes guidance for the identification and management of modern slavery risks.
<b>Supply Chain Policy</b>	✓	✓	Seeks to deliver a safe, secure, sustainable and value-for-money supply chain through an effective governance framework that enables good-faith dealings and transparent commercial processes. By creating sustainable supply, ASC ensures that the economic and other benefits of our procurement spend flow through more equitably to all workers in our supply chain.
<b>Procurement Manual and Guide</b>	✓		Stipulates all ASC procurement activities should be undertaken in a fair and ethical manner consistent with our Code of Conduct, with particular emphasis given to consideration of modern slavery risks. Outlines key procurement principles: achieve best value for money; apply fair and effective competition; and undertake procurement in an ethical manner.
<b>People and Culture Manual</b>	✓		Provides an overview of ASC's People and Culture-related policies and procedures; details conditions of employment; and outlines how we are complying with our <i>Fair Work Act 2009</i> <sup>2</sup> obligations.

Table 3: ASC risk management policies and their purposes.

<sup>2</sup> Fair Work Act 2009 (legislation.gov.au)

### **Requirements for suppliers**

ASC's Procurement Manual and Guide recognises that all procurement should be undertaken in a fair and ethical manner, in order to comply with ASC's Code of Conduct.

### **Supplier onboarding**

When new suppliers are onboarded, ASC's initial questionnaires include questions about possible modern slavery risks in the company's supply chain, its

understanding of their modern slavery obligations and how it will monitor modern slavery risk. This ensures ASC's procurement activities identify risk, so that appropriate mitigatory action can be undertaken.

### **ASC's form of engagement**

ASC's contract and purchase order templates set out minimum requirements for suppliers, and include a modern slavery clause within the terms and

conditions. While there have been instances where suppliers have asked for the modern slavery clause to be modified, most agree with the standard terms and conditions.

# Due Diligence and Risk Management

ASC seeks to raise its suppliers' understanding of modern slavery and assists its suppliers to identify high-level risks. The MSWG continuously reviews the actions in ASC's Modern Slavery Three-Year Risk Management Implementation Plan to ensure it enables a deeper understanding and examination of risks within ASC's supply chain, and maintains the Plan's relevance as ASC progresses its commitments.

## Managing Operational Risks

ASC's operational activities in FY 2022-23 were assessed as having an inherently lower risk of modern slavery, within the context of Australia and the company's human resource systems and controls. The company focused its efforts on implementing the following controls to maintain compliance with labour requirements and its understanding of modern slavery risks:

### Enterprise Bargaining Agreement (EBA)

ASC has four active EBAs across its workforce. ASC is also in the process of negotiating two new EBAs. Together, these EBAs cover approximately 30% of ASC's workforce.

ASC negotiates in accordance with the requirements of the *Fair Work Act 2009*.

All of ASC's EBAs have terms ensuring that any labour-hire employees covered by the respective agreement are entitled to the equivalent pay conditions of ASC's permanent employees.

### External remuneration review

ASC's HRRC is responsible for undertaking annual reviews of ASC's remuneration policy and strategy, which covers approximately 70% of ASC's salaried employees. This includes a review of external market rates to assess the continuing appropriateness of ASC salary bands. For FY 2022-23 this process was undertaken in September 2023.

### Training and Onboarding

As part of the onboarding process, ASC ensures its employees receive training in, and information on, appropriate grievance channels, ensuring they feel able and safe to raise any issues.

## Managing Supply Chain Risks

### Supply Chain Risk Identification and Assessment

In FY 2022-23, ASC continued to focus on improving its assessment of, and response to, modern slavery risks in its supply chain, implementing due diligence and remediation procedures to support high-risk suppliers in acting to mitigate relevant risks.

ASC also commenced implementation of a Supply Chain Intelligence tool, to understand modern slavery risks deeper in its supply chain. The tool will allow ASC to map and identify the risk levels of its Tier 1 and Tier 2 suppliers, by country and industry.

### Supply Chain Risk Mitigation

ASC takes a collaborative and risk-based approach to managing modern slavery risks in its supply chains. The company aims to achieve year-on-year improvements in its processes and systems to identify and respond to modern slavery risks.

### Direct Engagement

Following its 2022 risk assessment, ASC developed a Risk Action Plan with follow-up actions for material suppliers. In FY 2022-23, 19 Tier 1 suppliers were identified as high-risk. Follow-up actions included: a deep dive into each supplier's inherent risk rating; assessing supplier awareness of modern slavery legislation and supply chain risk; and reviewing media channels for any adverse articles. The suppliers were also invited to complete a more detailed questionnaire to supplement ASC's understanding of their business.

Modern slavery risk is included as a standard agenda item as part of ASC's periodic supplier meetings. This allows ASC's suppliers to raise any modern-slavery-related concerns or questions they may have, as well as providing ASC the opportunity to share its learnings in this area.

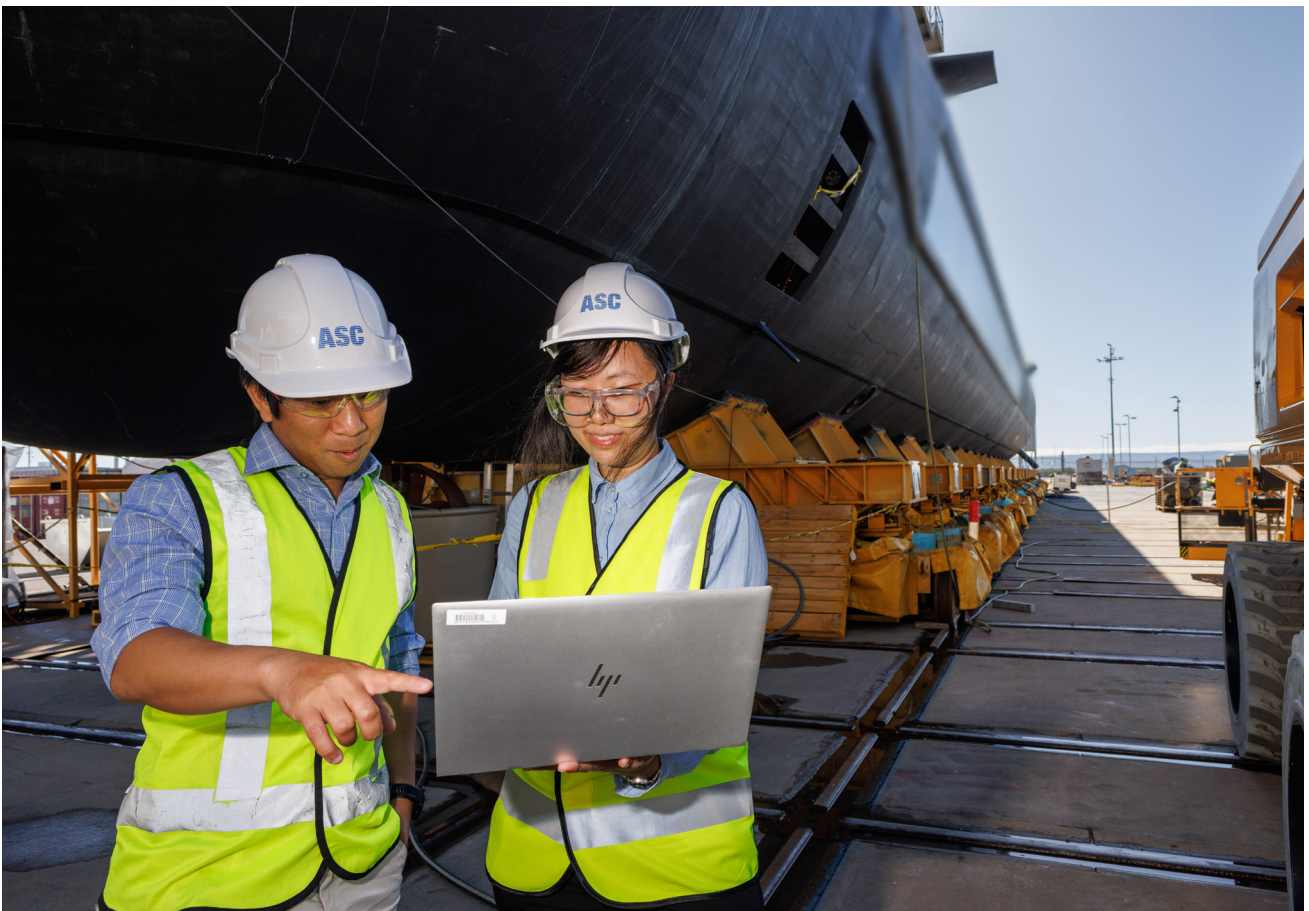


## Remediation and Grievance Mechanisms

ASC is committed to investigating all reported instances of actual or suspected modern slavery. Where an investigation confirms the presence of modern slavery in its supply chain or operations, ASC initiates remediation steps, which are detailed in its modern slavery process.

ASC's whistleblower reporting hotline is available and communicated to employees, contractors and suppliers to raise ethical or compliance concerns, including modern slavery. The Whistleblower Protection Process outlines how to report a business conduct concern, what happens when a report is made, and how ASC protect the reporter. ASC does not tolerate any form

of retaliation against an individual for reporting a business-conduct concern. This process is publicly available on ASC's website. No modern-slavery-related incidents were reported in FY 2022-23.



# Monitoring Performance and Reporting

The MSWG governs the implementation of ASC's modern slavery compliance framework and monitors progress against its Modern Slavery Three-Year Risk Management Implementation Plan. The MSWG is also responsible for providing the ASC Board with updates on the progress of ASC's modern slavery program.

## Assessing Effectiveness

### Continuous Improvement

ASC reviews its modern slavery compliance activities and follows a continuous improvement approach to increase the breadth and depth of modern slavery compliance activities over time through:

- regularly reviewing its internal KPIs and capturing any improvement opportunities; and
- reviewing progress against its commitments.

### Case Study 1

*In late 2022, ASC was made aware of possible instances of modern slavery among its indirect personal-protective-equipment-related suppliers. ASC identified this risk through its media monitoring processes. ASC proactively reviewed its direct and indirect supply of goods to identify high-risk products. The company then notified its suppliers to take appropriate steps to enhance their supply chain due diligence, and to review the need to purchase from any high-risk entities. In 2023, ASC continues to converse with suppliers regarding its stock, and continues to monitor the media to assess if any additional measures are required.*

### Performance

ASC's plan tracker will assist the company to assess the effectiveness of its approach to addressing modern slavery risks, and rate its progress against a range of priority activities. ASC will use the results to identify further continuous-improvement activities.

ASC also assesses its performance against quantitative KPIs. These targets, and the company's corresponding progress in FY 2022-23, are shown in Table 4.

ASC MODERN SLAVERY KPIs	TARGET	2022-23 STATUS
<b>Reporting:</b> Percentage of new supplier qualifications assessed against modern slavery criteria.	100%	100%
<b>Policy and Governance:</b> Percentage of milestones completed in accordance with Modern Slavery Three-Year Risk Management Plan.	100%	100%
<b>Policy and Governance:</b> Percentage of Supplier Relationship Management (SRM) Plans that include consideration of modern slavery risk mitigation in supplier operations and supply chains.	100%	100%
<b>Risk:</b> Percentage of Mitigation Plans approved and implemented for suppliers identified as high-risk for modern slavery.	100%	100%

Table 4: ASC modern slavery KPIs and current progress.

# Reflections and Looking Ahead: FY 2023-24

## Reflections

Since launching its modern slavery program, ASC has been committed to continuous learning and program-design innovation to mitigate and address the risks of modern slavery in its supply chain. The company is in the process of updating its modern slavery roadmap, and considering how it can undertake continuous improvement.

Modern slavery continues to be considered in ASC's overall ESG (Environmental, Social and Governance) approach, ensuring the company remains sustainable across all economic, environmental and social objectives.

<b>FUTURE PRIORITIES NOTED IN PREVIOUS STATEMENT</b>	<b>ACTION TAKEN IN FY 2022-23</b>
Continue to expand supply chain risk assessment beyond Tier 1 suppliers.	New Supply Chain Intelligence tool implemented to expand risk assessments beyond Tier 1 suppliers.
Review opportunities to share knowledge, such as through industry partnerships and membership of the UN Global Compact – Modern Slavery Community of Practice.	Prospects for some training-and-knowledge partnerships with external organisations reviewed.
Further develop action plans to address high modern slavery risks and ensure a consistent approach.	Risk Action Plans developed for 19 identified suppliers with a high risk of modern slavery.
Monitor media to identify and mitigate potential supply chain risk.	New Supply Chain Intelligence tool implemented to enable potential-risk suppliers to be flagged and track their media mentions.

Table 5: Actions taken to address priorities noted in previous ASC Modern Slavery Statements.

## Looking Ahead

In FY 2023-24, ASC will continue to strengthen its approach to identifying, mitigating and remediating risks. Some opportunities being considered include:

- expanding employee awareness through increased in-house training events, and Modern Slavery Roundtable sessions;
- continuing to implement the Supply Chain Intelligence tool to improve supply chain risk analysis and assessments beyond Tier 1 suppliers;
- assessing opportunities to enhance supplier oversight and engagement by leveraging analytical capabilities in ASC's new contractor management system; and
- increasing internal and external collaboration and knowledge sharing with industry bodies and suppliers.



# Annexure 1

ASC prepared this Modern Slavery Statement 2023 in accordance with the mandatory criteria listed in s. 16(1) of the Act. The table below lists these criteria and the sections in our statement that address each.

REFERENCE	AUSTRALIAN MODERN SLAVERY ACT 2018 MANDATORY REPORTING REQUIREMENT	LOCATION OF INFORMATION
<b>s. 16(1)(a)</b>	Identify the reporting entity.	Page 3 – About this Statement
<b>s. 16(1)(b)</b>	Describe the structure, operations, and supply chains of the reporting entity.	Page 5 – About ASC
<b>s. 16(1)(c)</b>	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls.	Page 7 – Modern Slavery Risks
<b>s. 16(1)(d)</b>	Describe the actions taken by the reporting entity, and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes.	Page 11 – Modern Slavery Risk Management Implementation Plan Page 12 – Commitment and Governance Page 13 – Policies and Procedures Page 15 – Due Diligence and Risk Management
<b>s. 16(1)(e)</b>	Describe how the reporting entity assesses the effectiveness of such actions.	Page 17 – Monitoring Performance and Reporting
<b>s. 16(1)(f)</b>	Describe the process of consultation with: i) any entities that the reporting entity owns or controls; and ii) in the case of a reporting entity covered by a statement under section 14, the entity giving the statement.	Page 3 – About this Statement
<b>s. 16(1)(g)</b>	Include any other information that the reporting entity, or the entity giving the statement, considers relevant.	Page 19 – Looking Ahead



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