

# Modern Slavery Supplier Toolkit

April 2026



# Table of Contents

<b>Section 1. Introduction</b>	
Why has Ausgrid published this toolkit ?	4
The legal stuff	5
How to use this toolkit	6
Let's work together	7
Feedback welcome	8
<b>Section 2. Modern slavery information</b>	
What is modern slavery ?	10-11
Modern slavery exists in Australian business'	12
What modern slavery may look like	13
Australia modern slavery legislation	14-15
Want to know more about modern slavery?	16
<b>Section 3. Modern slavery risk mitigations</b>	
Five essential modern slavery risk mitigation actions	18
How does Ausgrid address these measures?	19
Statement of support	20
Risk assessment	21
Due diligence	22
Grievance mechanism	23
Remediation process	24
Modern Slavery Statement	25
<b>Section 4. A beginners guide</b>	
The Basics: A beginners guide	27



# Section 1. Introduction



# Why has Ausgrid published this toolkit ?

Our large supplier footprint provides an opportunity to raise awareness and help our suppliers meet their modern slavery obligations.

**Ausgrid is the largest distributor of electricity on Australia's east coast, our grid powers the economic engine room of NSW.**

In FY25, Ausgrid purchased more than \$1 billion of goods and services from more than 1,500 local and international suppliers.

Ausgrid's significant purchasing power places it in a unique position to influence the management of modern slavery risks in its supply chain and the supply chains of its suppliers.



This tool kit is designed to help Ausgrid's suppliers comply with its expectations regarding Modern Slavery risk management.



This work supports our own commitment to respecting and supporting human rights across our operations and supply chain.



Ausgrid applies a continuous learning approach to its human rights activities. We welcome feedback on this toolkit and look forward to working together with our suppliers to improve human rights outcomes for workers in our supply chains and operations.

# The legal stuff

This toolkit is a learning tool; it is not legal advice.

Ausgrid does not claim to be a modern slavery expert – rather, we are sharing our learnings to assist our suppliers to improve their response to managing modern slavery risk.

All research and documentation referenced, including other organisations' modern slavery statements, are referenced in good faith and with the primary purpose to uplift and improve responses to modern slavery and to manage modern slavery risk.

Ausgrid applies a continuous learning approach to modern slavery. We will evolve and adapt this toolkit based on stakeholder feedback, the evolution of best practice and any changes to legislation.

**Disclaimer:** this document contains general information only and is not a substitute for you obtaining independent legal or other professional advice. You are responsible for obtaining your own independent legal advice. Neither Ausgrid nor its affiliates, nor its and their respective employees, contractors or agents provides any warranty or takes any responsibility for the accuracy or content of this document, or any third-party websites linked within this document. You use this document at your sole risk and must not rely on it.



# How to use this toolkit

This toolkit is designed to be flexible and practical, to help uplift your response to modern slavery risks in your business.

This toolkit can be used three ways:

1

**Basics:** Don't have much time and need to know the basics to address modern slavery risks?

Go straight to [Section 4 The Basics: A beginner's guide](#)

2

**Learning Tool:** Want to learn about modern slavery and what you can do to address modern slavery risks in your organisation and supply chain?

Read this toolkit as a book, use the resources in the "Want to know more sections" and share these learnings within your organisation or your own supply chain.

3

**Deep Dive:** Have a particular modern slavery mitigation you need help with ?

Go to [Section 3. Modern Slavery Risk Mitigations](#) and use the relevant page to learn more about best practice.

# Let's work together

If a modern slavery incident is identified in relation to goods or services supplied to Ausgrid, we want to know.

If a modern slavery incident is identified in relation to goods or services supplied to Ausgrid, we want:

- to know and work with you
- you to appropriately disclose the incident and the steps taken to address it

Here are some examples of organisations that have reported on modern slavery incidents in their supply chain:

- [ALDI 2024 Modern Slavery Statement](#)
- [Wesfarmers 2025 Modern Slavery Statement](#)
- [Apple 2025 Modern Slavery Statement](#)
- [Coles Group 2025 Modern Slavery Statement](#)

Our [External Partner Code of Conduct](#) communicates our expectations of our external partners and their supply chains in providing goods and services to our organisation



# Feedback welcome

Ausgrid welcomes feedback on this toolkit

Ausgrid is committed to a continuous learning approach in addressing modern slavery risks within our own practices.

We understand that best practice in this area is evolving, and we are open to adapting our activities and resources accordingly.

Feedback from our suppliers and stakeholders is highly valued.

Have feedback? Contact Ausgrid at [enquiries@ausgrid.com.au](mailto:enquiries@ausgrid.com.au)



## Section 2. Modern slavery information



# What is modern slavery ?

Modern slavery describes situations of serious exploitation in Australia or abroad where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom.



## Forced Labour

When a person is compelled to work under threat of punishment and has not willingly offered to do so.<sup>1</sup>

A migrant worker is promised a construction job in another country. Upon arrival he is coerced into working long hours without pay. The employer withholds his identification documents and threatens to report him to immigration authorities if he tries to leave or complain.



## Deceptive Recruitment Practices

When a person has been misled during the hiring process to entice them into accepting a job offer under false pretences AND the job involves exploitation through a type of modern slavery.

A young man responds to an advertisement for seasonal farm work that promises good pay and free accommodation. Upon arriving, the job is not as described, he is paid very little and must work long hours in poor conditions.



## Debt Bondage

When a person pledges their services, or those of someone under their control, as collateral for a debt;  
AND the debt can't be paid off;  
OR the duration and nature of those services are not defined or limited.<sup>1</sup>

A young woman is promised a well-paying job in another country. Upon arrival, she discovers that the job does not exist, and instead, she is forced into sex work to repay a debt to her traffickers.



## Servitude

When a person's personal freedom is significantly restricted, and they are not free to stop working or leave their place of work.<sup>2</sup>

A woman is brought into a home under the pretence of being a nanny. Once there, she finds herself living in the home and working long hours without compensation. She is unable to leave due to threats from her employer and confiscation of her identification documents.

 In an Australian employment context, deceptive recruitment practices, debt bondage and servitude are the most common risks.

1. [Hidden in Plain Sight, Defining and measuring modern slavery](#), Parliament of Australia  
 2. [Addressing Modern Slavery in Government Supply Chains: A toolkit of resources for Government procurement officers](#), Attorney Generals Department Australia

# What is modern slavery ?

Modern slavery describes situations of serious exploitation in Australia or abroad where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom.



## Forced Marriage

When a person gets married without freely and fully consenting,  
BECAUSE they have been coerced, threatened or deceived,  
OR BECAUSE they are incapable of understanding the nature and effect of a marriage ceremony, for reasons including age or mental capacity.<sup>2</sup>

A young woman is coerced into marrying a man she has never met, under the threat of violence or harm to her family.



## Slavery

When a person is viewed as property and lacks freedom to make their own choices or decisions or can choose their own work.  
When a person has any or all powers associated with the right of ownership exercised over them.<sup>1</sup>

A man may be captured and sold to a plantation owner, where he is made to work long hours in harsh conditions, with no freedom to leave or make choices about his life.



## Human Trafficking

When a person is recruited, transported, transferred, harboured or taken possession of,  
BY MEANS INCLUDING threat, use of force, coercion, abduction, fraud, deception, abuse of power, position of vulnerability, giving or receiving of payments, abduction for the purpose of exploitation.<sup>1</sup>

A girl is promised a better life and job overseas. Once she arrives, the job doesn't exist, and she is forced into prostitution to repay a debt to her traffickers. They use threats and violence to control her, making it impossible for her to escape or seek help.



## Worst Forms of Child Labour

When a child is subject to any form of modern (incl. compulsory recruitment for use in armed conflict);  
OR  
is used, procured or offered for prostitution, to produce pornography or for pornographic performances;  
OR  
is used, procured or offered for illicit activities, for the production and trafficking of drugs as defined in the relevant international treaties;  
OR  
must do work which, by its nature or the circumstances in which it is carried out, is likely to harm their health, safety or morals.<sup>3</sup>

 In Australia, the most reported form of modern slavery is forced marriage, labour exploitation and human trafficking

1. Protocol to Prevent, Suppress and Punish Trafficking in Persons Especially Women and Children, Palermo, 2000, Article 3  
2. People Smuggling and Human Trafficking, Attorney Generals Department Australia  
3. ILO, Convention concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour (No. 182), Geneva, 1999, Article 3.

# Modern slavery exists in Australian business

Modern slavery is real. It exists in Australia and in the supply chains of Australian businesses.

Maria, a migrant on a temporary visa, worked for commercial cleaning company contracted by a leading Australian property firm. Her supervisor frequently offered her and her colleagues cash-in-hand jobs for additional tasks like junk removal and demolition. However, they were not provided with proper protective equipment, and often found themselves locked inside the premises, unable to leave until the supervisor allowed it, with no defined working hours. When Maria raised concerns about these additional tasks, the supervisor threatened to fire her and the other workers, highlighting the exploitative conditions they faced.

A domestic worker was employed in the home of an Australian diplomat in Canberra. She was subjected to exploitative conditions, earning only \$11,212 for three years of work—approximately 65 cents an hour—while being denied proper wages and working excessive hours with minimal time off. Upon her arrival in Australia, her passport was confiscated, and she was not allowed to leave the house without permission. She eventually escaped with help from the Salvation Army after sharing her experiences with her family.

Korean workers in debt bondage were discovered on Australian construction sites, where they were involved in building offices and residential blocks. These workers lacked employment contracts and had no agreements regarding pay or working conditions. Hired through various contractors, they received no proper training or protective equipment and were instructed to use each other's safety induction cards. To repay loans taken from recruitment and migration agents, their salaries were heavily deducted with high interest rates, alongside costs for rent and food. They were crammed into small accommodations with seven or eight people, highlighting the exploitative and unsafe conditions they faced.

An Australian grocery chain conducted a social compliance audit that revealed foreign migrant workers from Nepal, Bangladesh, and Myanmar at a supplier site in Malaysia had paid excessive recruitment fees to a labour agent for their jobs. The audit also uncovered issues such as excessive overtime, the retention of identity documents, restricted movement, and withheld wages.

# What modern slavery may look like

Modern slavery is complex and difficult to identify, understanding “the signs” may help identify someone at risk.

<b>Isolation</b>	Victims may experience geographic, social, or linguistic isolation.
<b>Withholding or Underpayment of Wages</b>	There may be instances of unpaid wages or significant wage deductions.
<b>Excessive Working Hours</b>	Victims often work long hours without appropriate compensation.
<b>Debt Bondage</b>	Labor or services may be provided to repay an inflated debt.
<b>Deception About Work Conditions</b>	Individuals may be misled about the nature and conditions of their employment.
<b>Restricted Freedom of Movement</b>	Individuals may be monitored, guarded, or confined.
<b>Intimidation and Threats</b>	This can include threats of deportation or other forms of coercion.
<b>Physical and/or Sexual Violence</b>	Victims may face threats or actual violence.
<b>Confiscation of Documents</b>	Important documents (e.g. passports) are taken by their employer or a third party.
<b>Abusive Living and Working Conditions</b>	Victims often endure unsafe or degrading environments.
<b>Living at the Workplace</b>	Victims live at their workplace or in accommodation controlled by their employer.



# Australian modern slavery legislation

In 2018, Australia introduced legislation requiring any entity with a revenue >\$100M to produce an annual Statement.



Commonwealth legislative obligations will evolve as consultation on the agreed recommendations occur – monitor any further publications

2011

United Nations publishes [Guiding Principles on Business and Human Rights](#)

2018

[Modern Slavery Act 2018 \(NSW\)](#) (did not come into effect until 2022)  
[Modern Slavery Act 2018 \(Commonwealth\)](#)

2022

[NSW Anti-Slavery Commissioner](#) started

2023

[Guidance on Reasonable Steps to Manage Modern Slavery Risks in Operations and Supply-Chains](#) published  
[Modern Slavery Act 2018 \(Cth\) statutory review](#) (provides 30 recommendations) published

2024

[Australian Anti-Slavery Commissioner](#) started

2025

[Response to Modern Slavery Act 2018 \(Cth\) statutory review \(30 recommendations\)](#) published

2026

[Recommendations to strengthen Australia's modern slavery laws – Issues Paper](#) published

# Why does Australia have modern slavery legislation ?

To encourage businesses to take action to address modern slavery risks and protect workers in their operations and supply chains



**Australian Government**  
**Attorney-General's Department**

The Commonwealth *Modern Slavery Act 2018* entered into force on 1 January 2019.

The Act established a national modern slavery reporting requirement.

This reporting requirement applies to large businesses and other entities in the Australian market with annual consolidated revenue of at least \$100 million.

- There are estimated **41,000 people living in modern slavery in Australia** and **49.6 million people globally**. (source: [Walk Free's Global Slavery Index](#))
- Modern slavery is a multi-billion-dollar business.
- Many Australian companies may be unaware that modern slavery practices are occurring in their supply chains or businesses.
- Statistically, the incidence of modern slavery within Australia appears to be relatively low, but it is likely that the statistics reflect a **low level of awareness of the issues**, and the actual incidence may be much higher, both domestically and overseas.
- By managing and reporting on the risks of modern slavery in their operations and supply chains, Australian entities join the international effort to eliminate modern slavery.
- They also help to protect themselves from **serious legal, reputational, operational and financial risks of being connected with modern slavery**.



The purpose of modern slavery legislation is to ensure the money an organisation spends does not inadvertently support modern slavery.

# Want to know more about modern slavery ?

Australia has many organisations providing information to educate advocates and provide services to support modern slavery victims

## AUSTRALIAN MODERN SLAVERY RESOURCES

- [Australian Attorney Generals](#)
- [The Australian Anti-Slavery Commissioner](#)
- [The Office of the NSW Anti-Slavery Commissioner](#)
- [Red Cross Modern Slavery resources](#)
- [Walk Free Global Slavery index](#)
- [Australian Human Rights Commission](#)
- [Anti-Slavery Australia](#)

## INTERNATIONAL MODERN SLAVERY RESOURCES

- [UN Guiding Principles on Business and Human Rights](#)
- [Business and Human Rights Centre](#)
- [International Labor Organisation](#)
- [Responsible Sourcing tool](#)
- [US Dept of Labor: Sourcing Strong](#)
- [US Dept of Labour: List of Goods Produced by Child or Forced Labor](#)
- [OECD Due Diligence Guidance for Responsible Business Conduct](#)

## SEE SOMEONE AT RISK ? CONTACT:

- [Australian Federal Police](#) on 131 237
- [Anti-Slavery Australia](#) :
  - Call: 02 9514 8115 (9am–5pm AET Mon–Fri)
  - Email: [ASALegal@uts.edu.au](mailto:ASALegal@uts.edu.au)
- [Domus 8.7](#) on 02 9307 8464
- The Salvation Army:
  - Call 1800 000 277 (9am–5pm, Mon to Fri)
  - visit their [website](#)



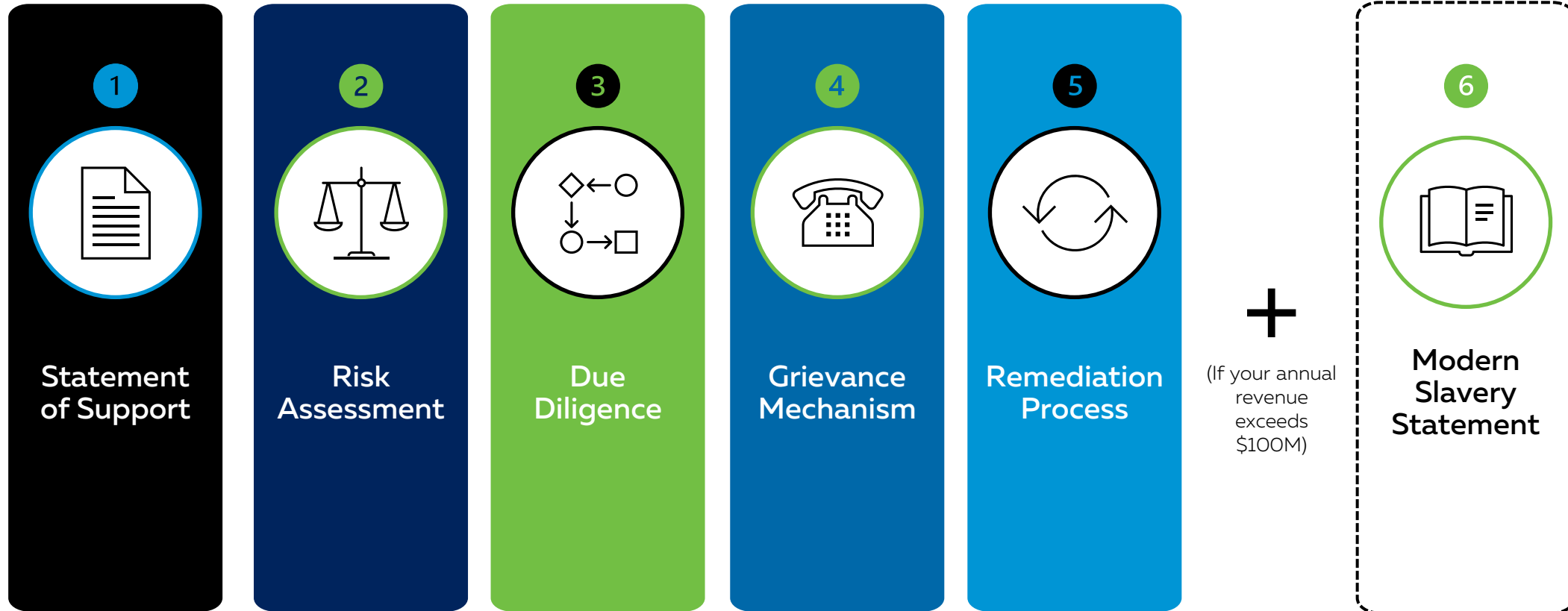
Modern slavery is an area of knowledge which is continually growing and evolving. Free and credible resources can be easily sourced online.

# Section 3. Modern slavery risk mitigations



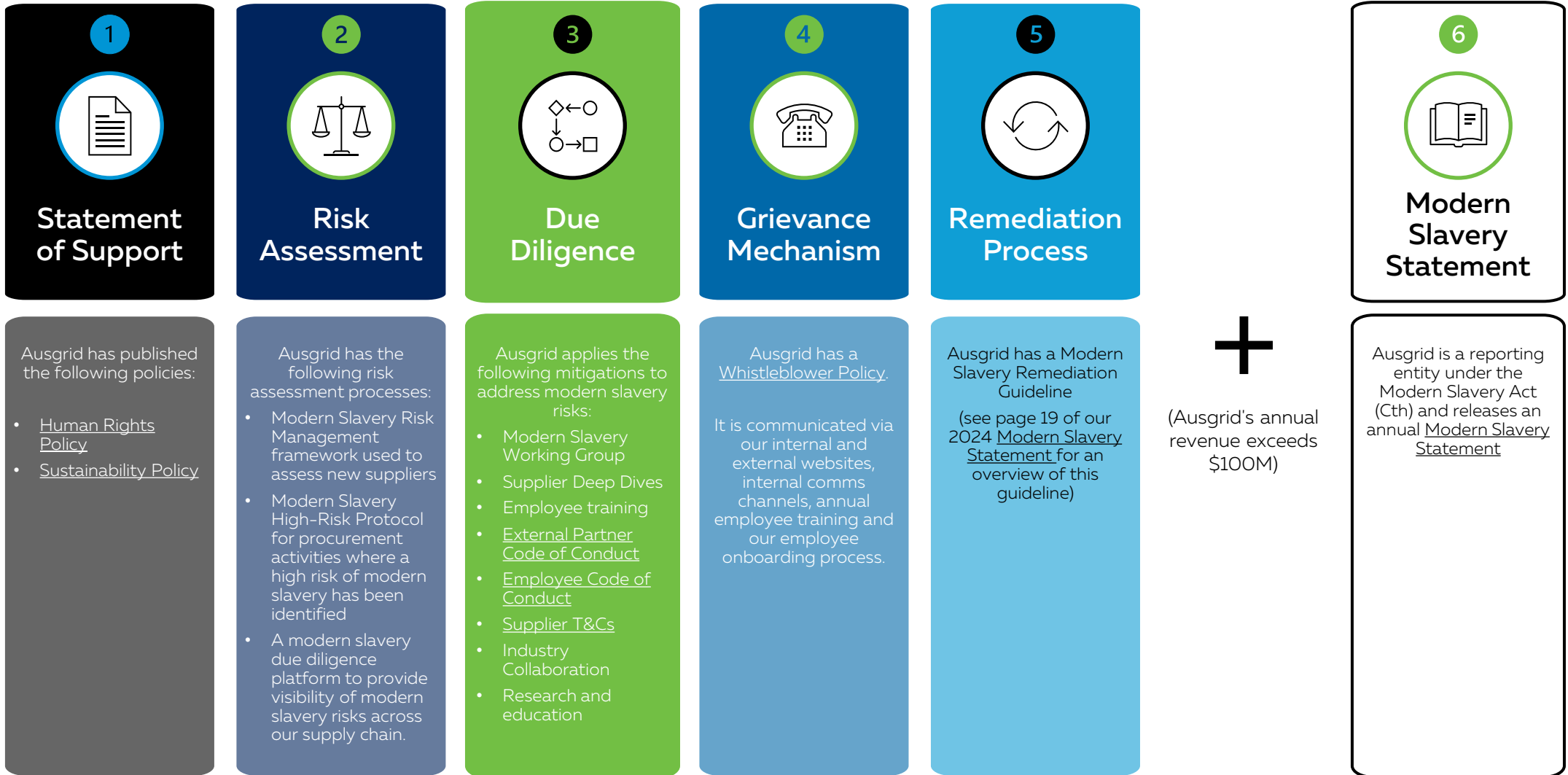
# Five essential modern slavery risk mitigation actions

Navigating modern slavery expectations can be daunting, here are five measures to mitigate against modern slavery risks



# How does Ausgrid address these issues ?

Ausgrid takes its responsibilities to address modern slavery in its operations and supply chain seriously.



# 1. Statement of support

A public facing document which clearly outlines your organisation's position on modern slavery and/or human rights.

## WHAT DO YOU NEED TO DO ?

Publish a statement which communicates to your workforce, suppliers and community your organisation's position on modern slavery and/or human rights.

Here are some suggestions on how to do this :

- A statement on your website or in your annual report  
A simple statement outlining your organisation's intentions on modern slavery and / or human rights.
- Human Rights Policy  
A standalone document which sets out an organisation's human rights intentions to the public.
- Modern Slavery Policy  
A standalone document which sets out an organisation's modern slavery intentions to the public.

## HUMAN RIGHTS OR MODERN SLAVERY POLICY EXAMPLES:

- **Export Finance Australia** [Statement of Human Rights](#) (statement)
- **Telstra** [Human Rights policy](#) (standalone policy)
- **City of Sydney** [Modern Slavery policy](#) (standalone policy)
- **Westpac** [Human Rights Position Statement and Action Plan](#)

## THINGS TO THINK ABOUT



- **Greenwashing**  
Be honest in your policy statements. Ensure it reflects genuine organisational commitment.
- **What are your existing policies?**  
Assess existing policies to ensure any new policies are integrated within the company's wider standards literature, e.g., employee codes of conduct; ethical sourcing standards; environment, health and safety guidelines; and social/community investment commitments. This avoids multiplicity of standards

## WANT TO KNOW MORE ?



- [A Guide for Business How to Develop a Human Rights Policy – United Nations Global Compact](#)
- [How to prepare a Modern Slavery Policy – Office of the NSW Anti-Slavery Commissioner](#)
- [Modern Slavery Information for small business – Small Business Commissioner NSW Government](#)

# 2. Risk assessment

Assess your operations (your workforce) and your supply chain (suppliers' workforce) for modern slavery risks

## WHAT DO YOU NEED TO DO ?

Conduct a risk assessment for vulnerability to modern slavery in the workforce of your own operations and supply chain.

### Here are some suggestions on how to do this:

- **Risk indicator assessment** Conduct a high-level assessment of your supply chain based on risk indicators i.e. category and/or geography.
- **Supplier level risk assessment** Ask your suppliers to provide information on their supply chain and workforce vulnerability and what risk mitigations are in place.
- **Risk assessment solution** Implement software which automates supplier questionnaires and the risk assessment process.
- **Third party audits** Engage a third party to conduct supplier audits.

## RISK ASSESSMENT EXAMPLES:

- **Telstra** used risk indicators such as category/sector, country, business model and vulnerable populations to assess modern slavery risk. See [2025 Telstra Group Modern Slavery Statement](#)
- **Treasury Wine Estates** used a human rights impact assessment (HRIA) to assess modern slavery risk across their operations and supply chain. See [2024 Statement on Human Rights and Modern Slavery](#)
- **Coles** used a combination of supplier screening, third party risk assessments, audit programs. See [2024 Coles Group Modern Slavery Statement](#)
- **Bendigo and Adelaide Bank** used the UNGP Continuum of Involvement to define their impact on human rights. See [2024 Modern Slavery Statement](#)

## THINGS TO THINK ABOUT



- **Australian based operations** Relying on Australian labour laws alone is insufficient; assess your operations to identify vulnerable workers, such as cleaners who face higher modern slavery risks.
- **Third party risk data** Third-party data sets help inform your risk assessment:
  - OASC: [Inherent Risk Identification Tool \(IRIT\)](#)
  - Walk Free: [Global Slavery Index](#)
  - Australian Border Force: [Register of sanctioned sponsors](#)
  - US Gov. Depart. of Labor: [Child & Forced Labor reports](#)
- **Near impossible to have no risk** It's unrealistic to claim a supply chain is free from modern slavery risk; organisations should instead identify where risks exist and their severity.
- **Assess degree of involvement** The UN Global Compact [Continuum of Involvement](#) helps understand if an organisation 'causes', 'contributes to' or be 'directly linked' to human rights risks and impacts.
- **Vulnerability is a key risk indicator** Identify key modern slavery [risk indicators](#) to assess worker vulnerability, with a particular focus on individuals who present multiple, compounding risk factors.

## WANT TO KNOW MORE ?



- [Identifying and Assessing Modern Slavery Risks – Australian Attorney General's Department](#)
- [Modern Slavery Risk Management A playbook for Australian SMEs to identify, manage and mitigate modern slavery risks – UN Global Compact](#)
- [Responsible Sourcing Tool](#)
- [Freedom House Global Freedom Information and Scores](#)

# 3. Due diligence

## What systems and processes are in place to manage Modern Slavery risks?

### HERE ARE SOME SUGGESTION ON DUE DILIGENCE ACTIONS TO PUT IN PLACE:

- **Training and Awareness programs** Online or in person training specifically on modern slavery and how it applies to their role or the organisation, including annual refresher training. Training can be provided to both employees and suppliers.
- **Supplier Selection Evaluation Criteria** Including modern slavery criteria in supplier selection criteria e.g. human rights policies or processes. Ensure this criteria has appropriate weighting in the overall scoring and assessment.
- **Social Audits or Third-Party risk monitoring** Evaluating an organisation's performance and behaviour specifically measuring its effects on society i.e. their compliance to human rights and fair working conditions.
- **Site Audits** Conduct a physical visit to assess suppliers' operations for compliance with human rights and fair working conditions.
- **Industry Collaboration** Working within your industry, with modern slavery experts or NGOs to share learnings and enable the broader uplift modern slavery risk responses.
- **Supplier Code of Conduct** Provide your suppliers with a statement of the behaviours which you expect from suppliers and their staff.

### THINGS TO THINK ABOUT



- **Ongoing maintenance and management** Due diligence actions require ongoing management and regular updates, such as refreshing training content and ongoing risk management. Good due diligence takes time and effort.
- **Prioritise** Prioritise efforts where they will have the biggest impact by focusing on the highest-risk areas, with due diligence scaled based on inherent risk (e.g. more detailed processes for higher-risk suppliers, industries, or regions).
- **Assessing effectiveness** Ensure there is a process to assess whether the due diligence action is serving its purpose. e.g. Is employees' awareness of modern slavery improving? Are suppliers adhering to the Supplier Code of Conduct?

### DUE DILIGENCE EXAMPLES:

- [Coles](#) provides online modern slavery training for staff, suppliers and stakeholders
- [Downer](#) use a supplier pre-qualification technology platform
- [Blackmores](#) conduct supplier location assessments and supplier audits
- [ALDI](#) has a Social Monitoring Program which conducts third party social audits
- [UTS](#) is home to Anti-Slavery Australia, the country's only specialist legal, research, and policy centre dedicated to ending modern slavery. It provides free legal services, advocacy, and education.
- [NIB](#) have both employee and supplier codes of conduct which address human rights
- [Stockland Corporation](#) have collaborated within the Australian property industry

### WANT TO KNOW MORE ?



- [What is human rights due diligence](#): Office of the Aust. Anti-Slavery Commissioner
- [Modern slavery due diligence: From policy to practice](#): Aust. Human Rights Institute
- [Guide for Property & Construction sector](#): Aust. Human Rights Commission
- [Guide for Financial Services sector](#): Aust. Human Rights Commission
- [Guide for Health Services sector](#): Aust. Human Rights Commission
- [Guide for Resource and Energy sector](#): Aust. Human Rights Commission

# 4. Grievance mechanism

## How someone in your organisation can report a modern slavery issue



"Grievance mechanisms can only be effective if the intended users know about their existence, understand how and when to use them, and trust them enough to do so". UN Global Compact

### WHAT DO YOU NEED TO HAVE ?

1. A communication channel for your workforce to report a modern slavery concern.
2. The communication channel communicated to your workforce in a meaningful way.
3. A documented process to follow (see Remediation Process).

#### Here are some suggestions on how to do this:

- **Simple Solution (small organisation)** A phone number and email address for your HR manager or other senior manager. Communicate this phone number in staff communications and onboarding training for new starters.
- **Advanced Solution (medium – large organisation)** Whistleblower mechanism which is extended to address modern slavery incidents. A whistleblower service can include email, fax, mail, website or mobile phone app.
- **International Solution** International worker grievance mechanism – local NGO and communication channel.

### GRIEVANCE MECHANISM EXAMPLES :

- **Winc** has extended their Whistleblower phone number to incorporate modern slavery concerns. See here [2024 Winc Modern Slavery Statement](#)
- **Coles** has multiple channels:
  1. Wages and conditions hotline and email
  2. Worker interviews
  3. STOPline (Coles externally hosted whistleblower service) which has phone, fax, email, mail and mobile phone app.
- **ALDI Australia** has in place:
  1. Whistleblower service (ALDI alert line)
  2. Multiple International Worker voice programs (see [ALDI 2024 Modern Slavery Statement](#))
- **Defence Housing Australia** has outlined their modern slavery grievance process online

### THINGS TO THINK ABOUT



- |   |  |
|---|--|
| • Workforce location?                       | Are they local, remote or international?   |
| • What languages does your workforce speak? | • Vulnerable workers are often migrant visa workers or workers with a culturally and linguistically diverse background.                    |
| • Workforce access to technology?           | • Vulnerable workers may have limited access to the internet or mobile phones.   |
| • Who will manage the channel?              | • Modern slavery is a complex and sensitive issue. The person responsible for responding to these enquiries must be appropriately trained. |

### WANT TO KNOW MORE ?



- [Whistleblower information](#) – Fair Work Commission Australia
- [Implementing Effective Modern Slavery Grievance Mechanisms](#) – UN Global Compact
- [Remediation and grievance mechanisms](#) – Doing Business With Respect for Human Rights
- [A Practical Guide for Effective Human Rights Grievance Mechanisms](#) – Australian Property Council

# 5. Remediation process

## What to do when someone reports a modern slavery issue

### WHAT DO YOU NEED TO HAVE ?

A documented process to follow if a modern slavery issue is reported.

Here are some suggestions on how to do this :

- **Simple process (small organisation)** High level process aligned with existing grievance process.
- **Mature process (medium – large organisation)** Modern slavery specific grievance process.

### REMEDIATION PROCESS EXAMPLES :

- **Westpac** [2024 Modern Slavery Statement](#)
- **Samsung** [Grievance Procedure and Access to Remedy](#)
- **Woolworths** [Human Rights Grievance process](#)
- **LUSH** [Modern Slavery Remediation Policy](#)
- **Coles Group**: [Ethical Sourcing Remediation Framework](#)

### THINGS TO THINK ABOUT



- **What is the goal?** To restore any individual or group who are harmed by a business's activities to the situation they would have been in had the impact not occurred. When this is not possible, remediation may provide other kinds of remedies that try to make amends for the harm caused.
- **Process to be victim centred** Organisations must have victims at the centre of the process to ensure their protection.
- **Degrees of influence and control** Companies have more ability to act where they directly contract with suppliers, and less influence further down the supply chain.
- **Complainant safety** Protecting the complainant's physical and psychological safety is paramount; remediation must be effective and prevent further harm

### WANT TO KNOW MORE ?



- [Modern slavery response & remedy framework – Walk Free](#)
- [Modern slavery in property & construction A practical guide for effective human rights remediation – Property Council of Australia](#)
- [Listening and responding to Modern Slavery in property and construction.](#)
- [A practical guide for effective human rights and grievance mechanism – Property Council of Australia](#)
- [Cleaning Accountability Framework](#)
- [Effective modern slavery grievance mechanisms – A Case Study Publication for Business – UN Global Compact](#)
- [Remediation and grievance mechanisms \(businessrespecthumanrights.org\)](#)

# 6. Modern Slavery Statement

Any Australian entity with a revenue over \$100m must produce and lodge an annual Modern Slavery Statement.

## WHAT DO YOU NEED TO DO ?

1. Write a Modern Slavery Statement (MSS) adhering to the criteria set out in the [Modern Slavery Act 2018 \(Cth\)](#) (see section 16).
2. Submit the MSS to the Attorney-General's [Modern Slavery Statements Register](#) within 6 months of the end of your organisation's reporting period.

A Modern Slavery Statement can range from a **simple word document** with each of the mandatory criteria addressed to a **graphic designed report** with each of the mandatory criteria addressed including reporting on other human rights related activities within your organisation. For example, some organisations have modern slavery action plans, case studies or other activities beyond the legislative requirements.

## MODERN SLAVERY STATEMENT EXAMPLES:

- **Gartner Australasia** ([word document](#) – simple company)
- **Atlassian** ([word document](#) – complex company)
- **Winc** ([graphic designed statement](#) – simple corporate structure)
- **APA Group** ([graphic designed statement](#) – complex corporate structure)
- **LUSH** ([website delivered statement](#) – complex supply chain)

## THINGS TO THINK ABOUT



### • NSW Modern Slavery legislation

This is the [NSW legislated Modern Slavery Act](#) which requires NSW state-owned corporations to submit an MSS to the Attorney General. This Act does not apply to commercial organisations. However, if you are a supplier to the NSW Government these obligations may impact you.

### • Modern Slavery legislative (Cth) review

In 2023 the [Modern Slavery Act 2018 \(Cth\)](#) was [reviewed](#), and 30 improvements were recommended. In December 2024, the government released its [response to the recommendations](#). The key change is new penalties will be introduced for:

- failure to submit statements
- providing false information; or
- failing to comply with remedial requests.

## WANT TO KNOW MORE?



- [Commonwealth Modern Slavery Act Guidance for Reporting Entities – Commonwealth Attorney General's Department](#)
- [Modern Slavery Disclosure Quality Ratings: ASX100 Companies Update 2025 – Monash University](#)
- [Modern Slavery Act Factsheet – Law Council Australia](#)
- [What businesses need to know about the Modern Slavery Review – Australian Human Rights Commission](#)
- [Government Response to the review of the Modern Slavery Act 2018 \(Cth\) – Commonwealth Attorney General's Department](#)

# Section 4. A beginner's guide



# The basics: A beginner's guide

Here are some suggested basic tools an organisation can put in place to get started

## GRIEVANCE MECHANISM

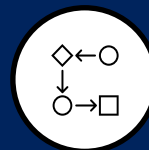


How someone in your organisation can report a modern slavery concern

Provide a phone number and email address for your HR manager or other senior manager or extend your whistleblower service to include modern slavery reporting

Communicate this phone number as the channel for reporting modern slavery concerns in high traffic areas, staff communications and onboarding training for new starters

## DUE DILIGENCE



Assess new suppliers for modern slavery risks

Put in place a simple Modern Slavery Supplier Assessment process as part of new supplier selection.

Use this simple NSW Government set of questions: [Modern Slavery Supplier Questionnaire](#)

## STATEMENT OF SUPPORT



A public facing document which clearly outlines your organisations position on modern slavery and /or human rights

Draft and publish a public statement of support for modern slavery.

Use this simple NSW Government Small Business page 6 [Anti-Slavery Policy Statement template](#)

## RISK ASSESSMENT



Assess your operations (your workforce) and your supply chain (suppliers' workforce) for modern slavery risks

Conduct a high-level assessment of your supply chain based on risk indicators.

Follow the advice of the [UN Global Compact Modern Slavery Risk Management](#) page 16.

[Walk Free Global Slavery Index 2023](#) and the [NSW Government Inherent Risk Identification Tool](#) may be helpful to understand what industries and countries have modern slavery risks.

## REMEDATION PROCESS



A documented process to follow if a modern slavery issue is reported

Document a process to follow if a modern slavery incident is reported in your operations or supply chain.

Communicate this process to key stakeholders within your business e.g. legal, HR, sustainability, risk and compliance, procurement, health and safety

Use this Walk Free Response and Remediation process: [Pg 12 Walk Free "Modern slavery response and remedy framework"](#)

## STAFF TRAINING AND AWARENESS



Provide online modern slavery training for your staff

Provide the following resource to your staff:

- [Anti-Slavery Australia free online training](#) (2 hours)



**Ausgrid Group is committed to working with its suppliers to eradicate modern slavery in all its forms.**