

<b>Policy Name</b>	Modern Slavery Policy		
<b>Approver</b>	Board	<b>Owner</b>	Chief Risk Officer
		<b>Lead</b>	Senior Manager – Modern slavery

Version	Date of Approval	Summary of changes made	Next review due
1.0	29 June 2020	New policy created	
2.0	23 June 2023	Policy updated	
2.1		Minor Revisions to update position titles and defined terms at 13 March 2024	2025

## 1 Purpose

This policy sets out Australian Red Cross' commitment to:

- (a) Promoting a whole-of-community approach to addressing Modern Slavery.
- (b) Complying with all applicable laws and regulations relating to Modern Slavery in its Operations and Supply Chains, including the Modern Slavery Act.
- (c) Supporting Modern Slavery survivors and proactively working to understand their lived experience to inform how Australian Red Cross addresses modern slavery.

## 2 Scope and Audience

This Policy:

- (a) Applies to the Humanitarian Services division of Australian Red Cross.
- (b) Does not apply to Lifeblood.

**Note:** Lifeblood has a separate Corporate Social Responsibility and Modern Slavery Policy. For details please contact Lifeblood. Details are available at [lifeblood.com.au](http://lifeblood.com.au)

## 3 Policy

### 3.1 Australian Red Cross' Commitments

Australian Red Cross is committed to:

- (a) Promoting a whole-of-community approach to prevent Modern Slavery based on the evidence and experience of delivering the Support for Trafficked People Program.
- (b) Complying with all applicable laws and regulations relating to Modern Slavery, including the *Modern Slavery Act*.
- (c) Raising awareness of Modern Slavery amongst Australian Red Cross People, Suppliers and Partners.
- (d) Investigating, mitigating, and remediating any incidents, near misses or concerns of Modern Slavery in its Operations and Supply Chains in a timely manner and referring any people impacted to appropriate support.
- (e) Engaging with Suppliers, Partners and donors that:
  - (i) Comply with applicable laws and regulations on Modern Slavery.
  - (ii) Adopt a proactive approach to identifying and addressing Modern Slavery in their Operations and Supply Chains.
  - (iii) Investigate, mitigate, and remediate any incidents, near misses or concerns of Modern Slavery in their Operations and Supply Chains in a timely manner.

### 3.2 Obligations of Australian Red Cross People

All Australian Red Cross People must:

- (a) Ensure Australian Red Cross complies with all applicable laws and regulations relating to Modern Slavery in any jurisdiction where Australian Red Cross operates, including the Modern Slavery Act.

- (b) Comply with all policies and procedures in relation to engaging with Suppliers, Partners, and Donors.
- (c) Undertake Modern Slavery training as determined by Australian Red Cross.
- (d) Identify, address and report any Modern Slavery incidents, near misses or material risks within Operations and Supply Chains in a timely manner.

**Note:** Incidents, near misses and concerns can be reported as set out at [redcross.org.au/speakup/](https://redcross.org.au/speakup/) or (for internal users only) [The Lounge > Departments > Risk and Compliance > Speak Up Report It.](#)

### 3.3 Obligations of Suppliers and Partners

- (a) All Suppliers and Partners must:
  - (i) Ensure they comply with all applicable laws and regulations relating to Modern Slavery (including the Modern Slavery Act) in any jurisdiction where they operate.
  - (ii) Use best endeavours to ensure there is no demonstrated Modern Slavery in their supply chains and operations.
  - (iii) Engage in due diligence (including completing risk assessments and correcting actions) and training on Modern Slavery if reasonably requested by Australian Red Cross.
  - (iv) Have a process in place to enable Workers in their operations and supply chains to raise concerns about their work conditions.
  - (v) Notify Australian Red Cross within 5 business days' of becoming aware of any material risk of Modern Slavery in their Operations or Supply Chains.

**Note:** Incidents, near misses and concerns can be reported as set out at [redcross.org.au/speakup/](https://redcross.org.au/speakup/)

- (vi) Use best endeavours to address any material risk of Modern Slavery identified and to prevent the recurrence of the conditions or circumstances which gave rise to the material risk in an effective and timely manner.
- (b) All Suppliers must acknowledge and comply with the principles set out in the Supplier Code of Conduct.

### 3.4 Breaches of this policy

- (a) Any breaches of this policy may lead to disciplinary action. Depending on the severity of the breach, such disciplinary action against:
  - (i) Australian Red Cross People may include reprimand, formal warning, demotion, stand down, suspension, or termination.
  - (ii) Suppliers, partners, or other parties may include suspension, or termination, including of any agreement.
- (b) Breaches of applicable laws or regulations may also result in prosecution by the appropriate authorities.

## 4 Other

### 4.1 Definitions

Term	Definition
Australian Red Cross	Australian Red Cross Society
Australian Red Cross People	As the context requires, all employees, volunteers, and members of Australian Red Cross
Donor	An individual, group, entity, corporation, or another party who makes a Donation on a one off or a regular basis. Donor does not include: <ul style="list-style-type: none"> <li>(a) the Australian Commonwealth Government</li> <li>(b) the government of an Australian State or Territory</li> </ul>
Humanitarian Services	The teams and programs responsible for undertaking the humanitarian work of Australian Red Cross and the supporting functions required

Term	Definition
Lifeblood	Australian Red Cross Lifeblood, the trading name of Australian Red Cross Blood Service established under Rule 19.1
Modern Slavery	Any conduct that constitutes modern slavery under the <i>Modern Slavery Act 2018</i> (Cth) (or any amendment or substitute to that Act from time to time), including slavery, servitude, forced labour, human trafficking, debt bondage, slavery like practices, forced marriage and deceptive recruiting for labour or services
Modern Slavery Act	<i>Modern Slavery Act 2018</i> (Cth), as amended from time to time
Operations	Activity undertaken by an organisation to pursue its objectives and strategy in Australia or overseas, including: <ul style="list-style-type: none"> <li>(a) Direct employment of workers</li> <li>(b) Provision and delivery of products or services</li> <li>(c) Processing and production</li> <li>(d) Financial investments (including investments in non-managed/operated joint ventures)</li> <li>(e) Managed/operated joint ventures</li> <li>(f) Leasing of property, products and/or services</li> <li>(g) Research and development</li> <li>(h) Charitable activities</li> <li>(i) Distribution, purchasing, marketing and sales</li> </ul>
Partner	Any organisation who is collaborating with Australian Red Cross or proposes to operate a joint venture. An indication that an organisation is a partner is that they may have permission to use the Australian Red Cross logo in conjunction with their own
Rules	The Rules of the Australian Red Cross dated 2 August 2013 (as amended or substituted from time to time)
Supplier	Any organisation or person who supplies Australian Red Cross with goods or services, and includes their officers, directors, subcontractors, agents, related entities, and consultants
Supply Chains	The products and services (including labour) that contribute to an organisation's own products and services. This includes products and services sourced in Australia or overseas and extends beyond direct suppliers, and includes: <ul style="list-style-type: none"> <li>(a) Products provided to the organisation by suppliers</li> <li>(b) Services provided by suppliers</li> <li>(c) Products and services used by indirect suppliers in the organisation's supply chains</li> </ul>

#### 4.2 Related Documents

- (a) Procurement Policy, and procedures.
- (b) Supplier Code of Conduct.
- (c) Partnership Protocol Policy.
- (d) Fundraising and Donations Policy.
- (e) Whistleblower Policy.
- (f) Policy Statement - Complaints, Concerns and Feedback Policy.

#### 4.3 Related legislation / standards

- (a) *Modern Slavery Act 2018* (Cth)
- (b) International Labour Organisation (**ILO**) conventions.