



# World Vision Australia Modern Slavery Statement for the Financial Year 2022/23

### I. Introduction

World Vision Australia (ABN 28 004 778 081) (**WVA**) is a reporting entity within the meaning of section 5(1)(a)(i) of the *Modern Slavery Act 2018* (Cth) (**Act**). This is a modern slavery statement as required under section 13 of the Act (**Statement**) for the financial year 1 October 2022 to 30 September 2023 (**Reporting Period**). This Statement outlines WVA's continued efforts to tackle modern slavery in its supply chain and wider activities.

# 2. Organisational structure

#### World Vision Australia

WVA is a Christian relief, development and advocacy organisation. Our focus is on helping the world's most vulnerable children overcome poverty and experience fullness of life.

WVA is regulated by the Australian Charities and Not-for-profits Commission as a registered charity under the *Australian Charities and Not-for-profits Commission Act 2012* (Cth). We are registered as a public company limited by guarantee under the *Corporations Act 2001* (Cth).

WVA is a signatory to the Australian Council for International Development (**ACFID**) Code of Conduct, which is a voluntary, self-regulatory sector code of good practice. As a signatory, we are committed to adhering to the ACFID Code of Conduct and conducting our work with transparency, accountability and integrity.

WVA is fully accredited by the Australian Government through its Department of Foreign Affairs and Trade. The accreditation process provides the Australian Government and the Australian public with confidence that they are funding a professional, well managed, community-based organisation capable of delivering good development outcomes.

WVA's Board is the ultimate decision-making body of WVA and is responsible for its overall governance. Our Board oversees the determination and implementation of policies and processes that reflect good corporate governance.

WVA's registered office is located at 1 Vision Drive, Burwood East, Victoria 3151.

The total number of WVA employees as at 30 September 2023 was approximately 472, comprised of 336 full-time, 54 part-time and 82 casual employees.

WVA does not own or control any separate legal entities and is therefore not required to report on the criterion described in section 16(1)(f) of the Act.

#### World Vision International Partnership

WVA is part of a global network of entities which together form the World Vision Partnership (**WV Partnership**). The WV Partnership delivers humanitarian relief and development programs to vulnerable communities across the world. The WV Partnership is not a partnership in the legal sense; it is underpinned by the World Vision International Covenant of Partnership that documents the foundational arrangements and agreed principles of all WV Partnership entities. In this context, WVA is a "twin citizen" operating in Australia but also with international commitments to the extent that they are consistent with Australian laws.

#### WVA Core Values and Mission

Our Christian faith is central to our work and we believe that every child has the God-given right to reach their full potential. We serve all people, regardless of religion, race, ethnicity or gender. We

collaborate with people of different faiths and people of no faith who share common values of compassion, love and mercy.

WVA has a zero-tolerance stance on acts of modern slavery and human trafficking. WVA is proactive in taking steps to prevent such acts occurring within its own supply chain. We partner with organisations that also observe appropriate ethical standards. As one of the world's largest humanitarian organisations, we use our scale and influence to address the entrenched, systemic issues that lead to poverty. WVA's core values and mission align with the spirit of the Act and the task of eliminating modern slavery.

# 3. Operations and supply chains

Through community development, humanitarian and emergency relief, and advocacy, WVA is dedicated to helping children, families and communities overcome poverty and injustice.

The WV Partnership operates in approximately 100 countries around the world, with WVA-funded programs predominantly conducted in Africa, Asia and the Pacific, the Middle East and Eastern Europe. The countries in which WVA operates may be found in our Annual Reports at <a href="https://www.worldvision.com.au/about-us/annual-reports">https://www.worldvision.com.au/about-us/annual-reports</a>. WVA also conducts programs involving First Nations communities in Australia.

WVA's suppliers are predominantly located in Australia. WVA engages various suppliers to carry out activities that further WVA's charitable purpose, including in the areas of fundraising, marketing, IT, office facilities and employment. During the Reporting Period, WVA did not work directly with many suppliers in high risk sectors for modern slavery such as extractives, construction or fishing. WVA routinely engages a small number of suppliers in the high risk industries of clothing and apparel, electronics, cleaning, coffee and cocoa. WVA has policies and procedures in place as described in this Statement to mitigate the risk of modern slavery affecting its supply chains.

Programs financed by WVA-raised funds are mostly delivered overseas by WV Partnership entities (each a **Field Office**), with appropriate technical oversight and support provided by WVA. Each Field Office engages local suppliers in the course of implementing World Vision programs. All WV Partnership entities are subject to WV Partnership policies (described in section 5 below) that contribute to reducing modern slavery risk by promoting human rights and high ethical standards. In some circumstances, WVA partners with non-World Vision entities for program implementation and enters into appropriate contractual arrangements with these entities which include clauses to mitigate risks of modern slavery.

WVA engages with a range of private donors and corporate partners that provide voluntary support for our fundraising and advocacy activities. During the Reporting Period, WVA continued to undertake its thorough due diligence process prior to entering into such partnerships, as further detailed in section 5.

Additionally, WVA operates a social enterprise business involving ethically sourced coffee (including café operations and roastery) in Australia using the registered business names "Little Things Cafe" and "Change Coffee".

# 4. Risks of modern slavery practices in WVA's operations and supply chains

#### **Suppliers**

In assessing suppliers for modern slavery risk, WVA separates engagements into high and low risk categories and focuses on high risk categories as a priority. High risk operations include supplier engagements which involve specific high risk countries or industries. WVA predominately uses Walk Free's Global Slavery Index to inform our risk approach and keep up to date with global trends in modern slavery risk across countries and industries. During the Reporting Period, supplier engagements at WVA identified as high risk include purchase of clothing items, IT equipment and electronic components for organisational operations, cleaning services and agricultural products such as cocoa and coffee beans for domestic roastery operations. Other suppliers engaged by WVA are service providers typically located in Australia and considered low

risk.

#### **Corporate Partners**

WVA engages with like-minded corporate partners that share WVA's vision to serve the world's most vulnerable children and wish to support our fundraising and advocacy activities. WVA staff routinely complete a due diligence checklist to identify key risks of prospective partnerships. The due diligence checklist includes comprehensive questions related to child and adult labour, exploitation and specific questions to assist with the identification and assessment of modern slavery risk within the potential partner's supply chains. These questions focus on countries, industries and supply chains with high risks of modern slavery.

During the Reporting Period, our due diligence enquiries identified one prospective partner operating in an industry with significant modern slavery risk. As part of our assessment of this organisation, we reviewed its modern slavery statement and were satisfied that the organisation has sufficient procedures and practices in place to mitigate modern slavery risk. Additionally, our enquiries did not identify any adverse findings against the organisation in relation to modern slavery. As a result, WVA has approved this corporate relationship, but will continue to monitor modern slavery risks in relation to this entity to inform whether an ongoing relationship with WVA remains aligned to our own values and objectives.

#### **Field Offices**

WVA, through World Vision Field Offices, operates in certain areas of the world which have a higher risk of modern slavery. Throughout the Reporting Period, World Vision Field Offices continued to be bound by a range of policies and procedures that mitigate the risk of modern slavery in their supply chains, as further detailed below in section 5ii.

# 5. Actions taken by WVA to assess and address modern slavery risks

During the Reporting Period, WVA continued to undertake key measures to assess and address modern slavery risk, including in the areas of screening, due diligence, contractual arrangements and policy implementation, as further detailed below.

#### Screening and Due Diligence

WVA conducts criminal record checks and working with children checks for key personnel of domestic contractors who have access to children or child data held by WVA. As many modern slavery practices also amount to criminal offences, these checks help to reduce the risk of WVA engaging with parties who have been convicted of crimes that undermine human rights and safeguarding.

WVA conducts due diligence, including modern slavery risk assessment, for suppliers that fall within the scope of WVA's procurement process. Suppliers identified as operating in high risk categories in section 4 above must complete a modern slavery declaration form to explain their approach to mitigating risks of modern slavery within their organisation and supply chains prior to progressing to further procurement stages.

High risk suppliers must also address on the modern slavery declaration form whether they comply with the United Nations International Labor Organization Conventions on the elimination of all forms of forced or compulsory labour and the effective abolition of child labour, whether they have policies and procedures in place that prohibit modern slavery, and explain the employment conditions they offer to workers.

All prospective corporate partners are assessed in line with WVA's due diligence checklist (discussed in section 4 above) which includes targeted questions to assist with the identification and assessment of modern slavery risk in a prospective partner's business and supply chains. Once completed, the due diligence checklist is then forwarded to WVA's Risk team for review. Whether a relationship with the entity is approved by WVA Risk will depend on a number of factors, including the level of modern slavery risk exposure posed by the entity and the conditions that need to be imposed should the relationship go ahead. If insufficient information has been provided in relation to modern slavery risks, further information is sought from the prospective partner to determine whether the entity meets the high ethical standards that are pre-requisite to

WVA entering into a partnership.

#### **Contracts**

WVA enters into written agreements with suppliers, contractors, corporate partners and program implementation partners on appropriate terms and conditions to ensure that a high level of transparency, accountability and ethics is upheld by external parties with whom we work. Contractual obligations include, for example, assurances that the counterparty employs practices consistent with those under relevant employment and labour laws, a requirement for the counterparty to take reasonable steps to minimise the risk of modern slavery in its supply chains, and a commitment to WVA's Modern Slavery Act Compliance Protocols (discussed below).

Where WVA engages a third party that will have access to children or adult beneficiaries of World Vision programs or personal data about those individuals, the contract with that party requires it to comply with WVA's Safeguarding Behaviour Protocols to minimise risk of sexual exploitation and other forms of harm and slavery-like practices.

WVA has a Supplier Code of Conduct that sets out the minimum legal, ethical, social and environmental standards WVA expects its suppliers to meet. The Supplier Code of Conduct is incorporated by reference in WVA's standard form supplier contracts and includes a range of measures to address and minimise the risk of modern slavery in WVA's supply chains, including a requirement for suppliers to adhere to WVA's Modern Slavery Act Compliance Protocols. Amongst other things, these protocols identify the actions WVA requires suppliers to take to prevent modern slavery and the process for engaging with WVA if a supplier identifies a case of modern slavery. The Supplier Code of Conduct also requires WVA's suppliers to commit to human rights, fair employment practices and ethical business activities in their supply chains. Specific standards are detailed in the Supplier Code of Conduct in relation to areas such as working conditions, wages, immigration, lawful subcontracting and how to report concerns via WVA's complaints or whistleblowing mechanisms. Collectively, these measures contribute to WVA assessing and addressing modern slavery risk in its supply chains by establishing contractually binding, high standards of conduct for suppliers to satisfy.

Additionally, WVA's procurement process and tender documentation require tenderers to explain their approach to mitigating risks of modern slavery in their supply chains. Responses provided are taken into consideration when evaluating and selecting successful candidates.

#### Remediation process

WVA has a range of remediation mechanisms and processes in place to address various instances of human rights violations, including cases of modern slavery.

WVA has an independent whistle-blowing hotline to encourage staff, contractors and a range of other eligible parties to report misconduct in a confidential and anonymous manner. The WV Partnership maintains similar global grievance procedures.

WVA takes a "survivor-centered" approach to reported breaches of WVA's Child and Adult Safeguarding Policy, prioritising the interests of the survivor who has suffered harm. This policy prohibits a range of behaviour that is consistent with the meaning of modern slavery (see section 5.ii below). For more information on our grievance procedures please refer to WVA's <a href="Complaints Policy">Complaints</a> Policy and Child and Adult Safeguarding Policy on our website.

WVA's standard form contracts with suppliers, corporate partners and implementation partners typically include dispute resolution provisions (including an escalation mechanism) if a concern arises during the engagement. Remedial action may include ending our business relationship with entities that do not adequately address modern slavery risks or incidents.

#### **Policies**

A range of policies contribute to assessing and addressing risks of modern slavery in operations and supply chains within WVA and the WV Partnership, including the following:

#### i. Relevant WVA Policies

Contract and Procurement Policy – requires WVA to manage its contracting and

procurement practices in a manner that upholds high ethical standards. This policy also requires staff to conduct procurement due diligence on suppliers, including in relation to modern slavery and compliance with the Act.

<u>Child and Adult Safeguarding Policy</u> – WVA subscribes to the WV Partnership Child and Adult Safeguarding Policy (as contextualised for Australian laws) described below under section 5.ii.

<u>Risk Management Policy</u> – sets out organisational approach to identify key risks and maintain adequate controls to manage those risks in a pro-active manner.

<u>Protected Disclosure Policy</u> – promotes an environment and culture where WVA staff and other relevant parties feel safe to speak up when there are reasonable grounds to suspect that WVA, its directors or employees are not acting ethically or in accordance with laws and obligations applicable to WVA. This includes reporting any concerns in relation to modern slavery which may be taking place within WVA's business or supply chain.

<u>Code of Conduct Policy</u> – establishes WVA's commitment to ethical and legal conduct, and requires adherence by staff to Australian laws and organisational policies.

#### ii. Relevant WV Partnership Policies

<u>WV Partnership procurement policies</u> – set out principles of ethical and sustainable procurement, including a supplier code of conduct requiring suppliers of Field Offices to observe international labour conventions and comply with World Vision's Child and Adult Safeguarding Policy.

WV Partnership Child and Adult Safeguarding Policy and guidelines – establish World Vision's commitment to do no harm to any child anywhere nor to adults living where World Vision has a programming presence. The policy sets out World Vision's zero tolerance stance on incidents of violence or abuse against children or adults, including sexual exploitation or abuse and other practices consistent with the meaning of modern slavery. The guidelines prohibit hiring children for child labour i.e. work that is mentally, physically, socially, or morally dangerous and harmful to children, or that interferes with their schooling.

<u>WV Partnership Disaster Management and Conflict Response Policy</u> – sets out humanitarian principles that underpin World Vision's humanitarian work, and affirms, among other things, principled humanitarian action and humanitarian protection.

The WV Partnership is committed to a number of external international humanitarian standards and protocols, including the Code of Conduct for the International Red Cross and Red Crescent Movement and Non-Governmental Organisations in Disasters, United Declaration of Human Rights, and the UN Convention on the Rights of the Child. Our programs and advocacy are based on these international standards.

WVA partners with World Vision Field Offices overseas to implement programs in-country. Field Offices are also bound by the WV Partnership Policies discussed above, which contributes to mitigating risk of modern slavery in this aspect of WVA's supply chain. World Vision International monitors compliance by Field Offices with WV Partnership policies and provides regular reports to WVA on their capacity building, including safeguarding and other areas that relate to modern slavery practices. Further, WVA's project management system requires WVA's country impact managers to check on the progress of the safeguarding action plan with the relevant World Vision Field Office.

## **Training**

WVA periodically conducts procurement and contracting training for staff in key roles with purchasing or decision-making power. When this training is undertaken, it includes a focus on due diligence under WVA's Contract and Procurement Policy and relevant procedures, as well as specific requirements under the Act. All WVA staff are required to complete safeguarding training every two years.

#### Ethically Sourced Coffee Beans & Cocoa

WVA sources coffee beans and cocoa to support its social enterprise café and roastery businesses.

These products are considered high risk industries for modern slavery. WVA addresses this risk by leveraging three ethically sourced supply chains; Fairtrade, Rainforest Alliance and B-Corp Certified. This enables competitive sourcing and effective management of supply, while ensuring the coffee and cocoa continue to be purchased from ethical producers.

# 6. How WVA assesses the effectiveness of actions being taken to assess and address modern slavery risks

WVA conducts regular audits regarding compliance with policies and the effectiveness of its processes. WVA periodically reviews and updates its policies and processes.

WVA is committed to approaching its modern slavery obligations with a mindset of continuous improvement and seeking opportunities to better its practices and procedures over time. WVA has a working group of key internal stakeholders that meet on a regular basis to assess whether our modern slavery practices and procedures are effective. WVA also has an intranet site to provide information to staff in relation to modern slavery processes.

### 7. Other relevant information

WVA remains committed to keeping its policies, procedures and training under review and updating these as needed in order to maximise the contribution it makes to tackle modern slavery.

This Statement has been approved by the Board of World Vision Australia and signed on their behalf

**Peter Trent** 

Chair of the Board World Vision Australia