



The Modern Slavery Act (the "Act") requires the lodgment of a "modern slavery statement" by any entity that has annual consolidated revenue of at least AUD100 million over its twelve month reporting period and is either an Australian entity at any time in that reporting period or a foreign entity carrying on business in Australia at any time in that reporting period. The Act also contemplates voluntary reporting.

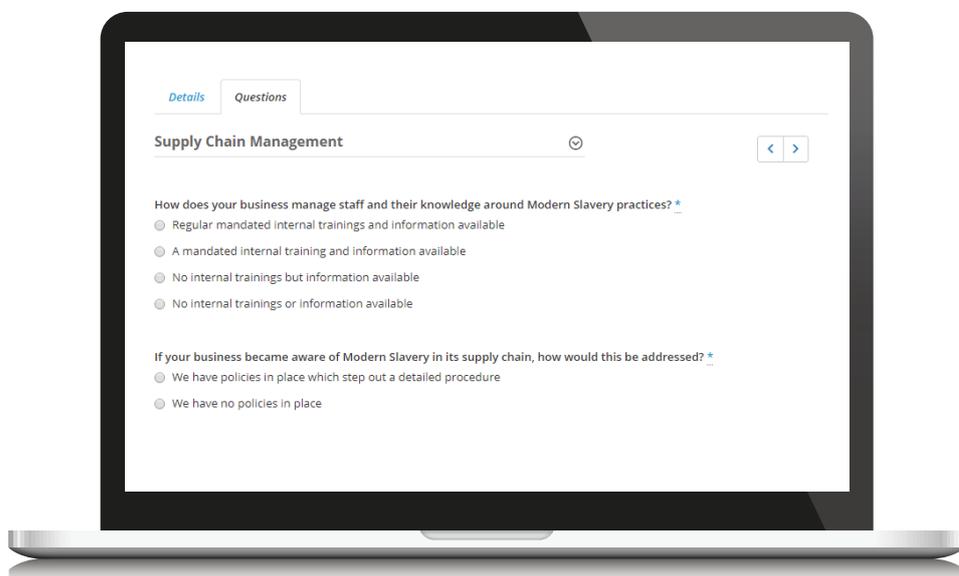
We have developed a modern slavery portal to assist our client's compliance with the Act by assisting with identifying modern slavery and risks in their supply chains. In addition, the modern slavery portal was developed to deliberately integrate compliance with certain mandatory reporting criteria required in modern slavery statements including:

- detail of the reporting entity's structure, operations and supply chains;
- description of the risks of modern slavery practices in the operations and supply chains;
- description of the actions taken to assess and address these risks, including due diligence and remediation processes; and
- description of how the reporting entity assesses the effectiveness of these actions.

Modern Slavery Portal

Supplier Questionnaire

The modern slavery portal securely hosts and automates the distribution and collation of supplier questionnaires allowing efficient collaboration with suppliers to understand their current position regarding modern slavery. Cowell Clarke works with our clients to design the supply chain questionnaire to ensure it appropriately meets compliance standards as well as being customised to our client's business structure, risk appetite and knowledge of suppliers.



Risk Assessment

Based on supplier responses to the portal questionnaire, a risk assessment is calculated, resulting in suppliers being characterised as high, medium, low risk or very low risk. In collaboration with our clients' preferences and risk appetite, Cowell Clarke incorporates high-level approval and/or legal recommendation workflows into the portal ensuring, that the risk is remediated appropriately.

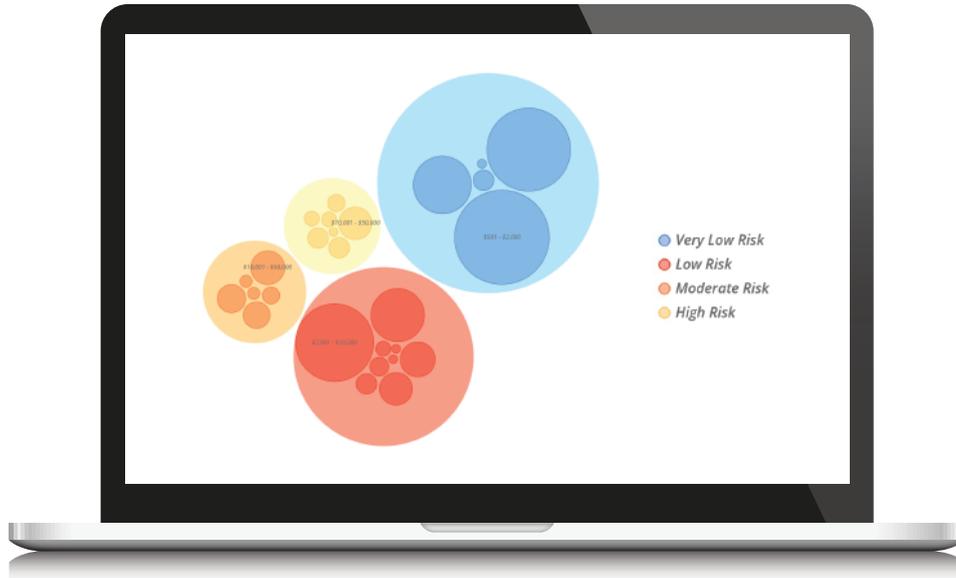


Red Flag Group Due Diligence

Cowell Clarke has incorporated independent due diligence screenings into the modern slavery portal through collaboration with Red Flag Group IntegraCheck®. These independent screenings integrate a further layer of risk management accumulating a wide range of publicly available information. The report produced through the screening can be accessed via the portal with remediation recommendations (if requested).

Reporting

The modern slavery portal consolidates numerous valuable data points into robust reporting functionality assisting in ongoing risk and supply chain management as well as summarising the essential reporting criteria for the modern slavery statement.



Know Your Supplier

Cowell Clarke's portal can also be used for much more than modern slavery compliance. We have developed a 'know your supplier' questionnaire to assess broader commercial considerations when entering into a supplier relationship. This can encompass assessments of a supplier's insurance, environmental conservation, anti-bribery compliance as well as modern slavery risks. By using the Know Your Supplier questionnaire you can ensure that you are comprehensively assessing, identifying and tracking risks of suppliers who enter into your supply chain.

Contact Information

For additional information relating to the modern slavery portal and how the solution can be of assistance to your business, contact below:



Megan Jongbloed

Director

D: +61 8 8228 1107

E: mjongbloed@cowellclarke.com.au



Emma Peters

Senior Associate

D: +61 8 8228 1169

E: epeters@cowellclarke.com.au

ADELAIDE

Level 9, 63 Pirie Street
Adelaide SA 5000
T: +61 8 8228 1111

www.cowellclarke.com.au

Liability limited by a scheme approved under
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SYDNEY

Level 21, 133 Castlereagh Street
Sydney NSW 2000
T: +61 2 8089 3199