

## MODERN SLAVERY STATEMENT

1 July 2022 – 30 June 2023

This statement is published by the Australian Nuclear Science and Technology Organisation (ABN 47 956 969 590) (ANSTO) in accordance with the *Modern Slavery Act 2018* (Cth). Three core values underpin ANSTO: safe, secure and sustainable. At ANSTO, we understand that ethical conduct and protecting human rights is critical to upholding these values. We are committed to contributing to the eradication of modern slavery through compliant, responsible and ethical business practices. This statement also outlines our efforts to monitor, assess and address modern slavery risks in our business and supply chain, and sets our plans for continuous improvement.

### About Us

ANSTO is an Australian Government Corporate Commonwealth entity established under the Australian Nuclear Science and Technology Organisation Act 1987 (Cth). ANSTO sits within the Department of Industry, Science and Resources (DISR) portfolio. ANSTO has a Board of Directors appointed by the Australian Government. ANSTO's Chief Executive Officer (CEO) is appointed by the Board and endorsed by the Australian Government Cabinet. The responsibility for procurement processes is held under the Chief Operating Officer (COO), where the COO directly reports to the CEO.

ANSTO is the largest producer of nuclear medicine in Australia and one of the largest public research organisations in Australia, conducting research in nuclear science and technology across a number of fields including health. ANSTO provides expert advice to the Australian Government in relation to nuclear-related matters, coordinates with international nuclear organisations and partners with research bodies and universities. ANSTO facilitates training and education, including through scientific research fellowships, and makes available its state-of-the-art facilities, equipment and expertise to further research and development. ANSTO operates landmark Australian infrastructure for its research including the Open Pool Australian Lightwater (OPAL) multi-purpose reactor, the Centre for Accelerator Science, Australian Centre for Neutron Scattering, the National Deuteration Facility and the Australian Synchrotron. ANSTO's main campus and registered office is New Illawarra Road, Lucas Heights NSW. Its other key facility is located in Clayton, Victoria. ANSTO employs approximately 1,350 people across Australia and regularly hosts scientists and students to further their research. ANSTO performs the procurement function on behalf of its subsidiaries.

### Our Supply Chain

The supply chain for ANSTO remains consistent year-on-year at over 4,000 suppliers. ANSTO procures a diverse range of goods and services, predominantly scientific and engineering plant and equipment, nuclear materials, IT hardware and software, security and laboratory consumables. ANSTO supports and engages in research partnerships and knowledge sharing activities with several international partners through both formal institutional partnerships and approved collaborations. ANSTO participates in whole-of-government procurement through shared Commonwealth contracts, as well as engaging in direct procurement from suppliers. ANSTO records procurement activities on Austender as required by the applicable Commonwealth Procurement Rules, and also discloses contracts entered in accordance with the requirements of a corporate Commonwealth entity.

**Our process of consultation in the development of the Statement with any entities owned or controlled.**

To prepare this Statement, during the reporting period this statement covers, all internal stakeholders and companies/entities owned or controlled (refer to the Table A below) were actively engaged in the development of this statement. The details of the reporting requirements of the *Modern Slavery Act 2018*, information regarding the actions to be taken to address these requirements and provided them with relevant materials and updates where discussed.

The consultation processes included:

- An organisation-wide review to gauge the level of engagement, knowledge and/or actions taken to understand or address modern slavery risks.
- Consultations with internal stakeholders across business areas with potential modern slavery risk factors or who play a role in risk mitigations. These stakeholders included representation from procurement, facilities management, business development, information management and technology functions.
- A review of the Statement’s contents by relevant personnel throughout the drafting process by senior managers including Procurement, Finance, Regulatory and Governance, and the Business.

**Table A**

No	Entity	ABN	Reporting Entity
1	PETTECH Solutions Pty Ltd	81 125 708 063	No
2	ANSTO Nuclear Medicine Pty Ltd	84 165 322 752	No

**Risks of Modern Slavery in ANSTO’s Supply Chain**

Consistent with the risk-based approach of the Commonwealth Government and the UN Guiding Principles on Business and Human Rights, ANSTO’s approach to assessing the risk of modern slavery is primarily through its supply chain. In assessing the risk, ANSTO relies on Commonwealth and other relevant guidance to target products and services, sectors and locations in which modern slavery has been found to take place, including high risk communities, countries and industries.

ANSTO has reviewed the spend profile and consistent with previous years has identified the following products as being the highest risk:

- Garments (uniforms, gloves, and other protective equipment).
- Electronics.
- Chemical suppliers (Elements and Mining).

To minimise the risk, ANSTO:

- Does not procure the above products directly from producers linked to geographical locations identified to be at a higher risk of modern slavery.
- Procures electronics from a whole-of-government contract, leveraging the benefit of the Commonwealth’s due diligence process.

- Procures garments through an Australian distributor which has provided ANSTO with a statement confirming that it has zero tolerance to all forms of Modern Slavery and is constantly evaluating the compliance of its supply chain.
- Procures chemicals from local distributors who have conducted continuous due diligence on the supply chain via active surveillance audits and have provided supporting Modern Slavery Statements.

ANSTO has developed a process to screen suppliers to identify whether any high-risk products may be sourced indirectly from high-risk communities or geographic locations and to verify the steps taken to ensure compliance with the *Modern Slavery Act*. The procurement spend profile has not changed from previous years and there have been no claims or reported instances of modern slavery in our supply chain.

## Addressing the Risks of Modern Slavery

Consistent with ANSTO's values, our policies and processes have a strong focus on ethics. A Code of Conduct, which sets clear expectations of all personnel in respect to ethical and legal compliance is in place.

ANSTO's procurement strategy, guidelines and policy both align with the Code of Conduct, with an emphasis on transparency, ethics and risk management. The procurement function has well-defined processes and procedures to ensure that all procurement activity complies with the Commonwealth Procurement Rules, including that the lowest price is not the sole determinant in achieving value for money.

ANSTO requires its suppliers to adhere to the same high ethical standards. Standard procurement contract templates include a requirement for suppliers to comply with the obligations under the Modern Slavery Laws (defined in the contract as the *Modern Slavery Act 2018* (NSW) and the *Modern Slavery Act 2018* (Cth), including to:

- Identify, assess and address risks of modern slavery practices in the operations and supply chains of the provision of the goods and services.
- Provide information reasonably required by ANSTO and comply with reasonable directions for the purpose of enabling ANSTO to comply with its modern slavery obligations.
- Ensure personnel responsible for managing the operations and supply chains under the contract are trained to identify and report Modern Slavery.
- Prepare and implement a modern slavery risk management plan in relation to the performance of the contract which at the minimum addresses:
  - The supplier's steps to identify and assess risks of modern slavery practices in the operations and supply chains used in the performance of the contract.
  - The Supplier's processes for addressing any modern slavery practices of which it becomes aware in the operations and supply chains used in the performance of the contract.
  - The content and timing of training for personnel about modern slavery.
  - The grievance mechanism/s available to personnel to handle complaints or grievances about modern slavery practices.
- Comply with its modern slavery risk management plan.
- If it becomes aware of modern slavery practices to take all reasonable action to address or remove practices and remediate any adverse impacts caused or contributed to by the supplier.

In terms of continuous improvement and monitoring, ANSTO encourages its staff to report any instances of illegal or unethical conduct. All personnel have access to an independently monitored reporting service.

As part of continuous improvement and routine business practices ANSTO has:

- Maintained the Approach to Market template to require compliance with modern slavery laws.
- Maintained the vendor creation template forms to include checklists to screen vendors as part of the supplier enablement process to provide modern slavery statements.
- Enhanced the functionality of the Procurement technology database to record and store Modern Slavery Statements under the vendor records.
- Conducted regular awareness training with all ANSTO staff involved in the Sourcing and Procurement activities on the requirements of Modern Slavery activities and the risk associated in dealing with high-risk categories, communities and countries.

## **Assessing the Effectiveness of the Actions being taken to Address Modern Slavery Risk**

To monitor the effectiveness of the actions taken to address modern slavery risks, ANSTO has undertaken the following measures this year:

- Analysed its spend data for both operations and supply chain, which considered risk based on category, industry, geography and potential intersections with vulnerable people.
- Reviewed the nature of its operational activities for exposure to worker vulnerability and industries exposed to modern slavery risk in each geography.
- Conducted internal stakeholder interviews to validate findings and check for any additional information not found in spend or public data.

Continued to engage suppliers of high-volume items, including the garment distributor, to review their policies and processes with respect to modern slavery compliance.

- Targeted suppliers of some higher risk items i.e., chemicals, general stationery and electronic instruments to present results of “active surveillance” audits of the respective supply chains confirming compliance.
- Continued the formal “performance review”, which is based on risk and contract value and is conducted on a regular basis. This includes a review of the Modern Slavery Statements for suppliers of high-risk categories.
- Tracked and monitored staff training with respect to modern slavery.
- Commenced a review of our Procurement contracts to include stronger Modern Slavery clauses and the procurement process flow including the supplier performance.

## **Our Next Steps**

ANSTO takes a multi-faceted approach which established a strong baseline from which to build and measure its ongoing treatment and reporting of modern slavery risk. ANSTO will continue to embed the strategies outlined in this Statement, with an additional focus on the following areas over the next 12-month reporting period:

- Maintain the level of training, including for new staff on the awareness and application of modern slavery risk treatment by ANSTO employees in their procurement and contract management activities.
- Further segment suppliers into different risk categories based on the type or manufacturing location of what they supply to ANSTO.
- Expand the risk-based vendor checks on what measures/audits are conducted under an active surveillance of compliance to their policies and Modern Slavery risk management plan.

- Continue to actively monitor the second tier of current ANSTO suppliers in high-risk categories.
- Continue to maintain our policies and contract templates to reflect our position with respect to modern slavery and to include environmental, social and governance requirements.
- Establish a Sustainable Procurement Working Group with oversight of modern slavery risks within our goods and services contracts.

## Approval

The Board is the accountable authority and principal governing body of ANSTO and approves this statement.

Signed in accordance with a resolution of the Board for and on behalf of the ANSTO by its responsible member:

A handwritten signature in blue ink, appearing to read 'Annabelle Bennett', is written over a horizontal line.

The Hon Dr Annabelle Bennett, AC SC FAA FAL  
Board Chair

8 December 2023