

MODERN SLAVERY STATEMENT

1 July 2023 – 30 June 2024

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 the ANSTO organisation: 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 chains, 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. The responsibility for procurement processes is held under the Chief Operating Officer (COO), where the COO directly reports to the CEO.

ANSTO is one of the largest public research organisations in Australia, conducting research in nuclear science and technology across a number of fields, including health, and has an essential role in domestic nuclear medicine manufacturing. On average ANSTO's radioisotopes are used in 10,000-12,000 nuclear medicine procedures each week, benefitting Australians battling cancer and other diseases. ANSTO produces ~80 percent of the parent radioisotope for the most commonly used nuclear medicine, essential in meeting this country's nuclear medicine needs.

ANSTO provides expert advice to the Australian Government in relation to nuclear-related matters, coordinates with international nuclear organisations and as a contributor to international knowledge creation and innovation partners with research bodies and universities. We facilitate training and education, including through scientific research fellowships, and make available our state-of-the-art facilities, equipment and expertise to further research and innovation. ANSTO operates landmark Australian infrastructure including the Open Pool Australian Lightwater (OPAL) multi-purpose reactor, the Centre for Accelerator Science, Australian Centre for Neutron Scattering, the National Deuterium Facility and the Australian Synchrotron. ANSTO's main campus and registered office is New Illawarra Road, Lucas Heights NSW. There is another key facility located in Clayton, Victoria. We employ approximately 1,461 people across Australia and regularly host scientists and students to further their research. ANSTO performs the procurement function on behalf of its subsidiaries.

Our Supply Chain

The supply chains for ANSTO remain consistent with over 4,000 suppliers. ANSTO procures a diverse range of goods and services, predominantly scientific, engineering plant and equipment, nuclear materials, IT hardware and software, cybersecurity 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 specialist suppliers. ANSTO records procurement activities on Austender as required

by the applicable Commonwealth Procurement Rules, and it also discloses all approved contracts in accordance with the requirements of a Commonwealth entity.

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

To prepare this Statement, we actively engaged and consulted with all internal stake holders and companies/entities we own or control (Refer to the **Table A** below) to collate and validate all information pertinent to this report. We discussed the details of the reporting requirements of the *Modern Slavery Act 2018*, information regarding the actions designed to address these requirements and provided each respondent with relevant materials and updates.

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 controls. These stakeholders included representation from procurement, facilities management, business development, information management and technology functions.
- The Statement is consistent with that of previous years. There has been no change in the Legislation or ANSTO’s obligations under it.

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

*Deregistered effective 21 May 2024

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 chains. 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 associated with the highest risk:

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

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 its electronics from a whole-of-government contract and established channel partners, 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 its 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.
- Procures paper supply from a whole-of-government contract leveraging the benefit of the Commonwealth's due diligence process.

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 expenditure 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. We have in place a Code of Conduct, which sets clear expectations for all personnel in respect to ethical and legal compliance.

Our procurement strategy, guidelines and policy both align with the Code of Conduct, with an emphasis on transparency, ethics and risk management. ANSTO's procurement function is centralised, has well-defined processes and procedures to ensure that all procurement activity complies with the Commonwealth Procurement Rules.

ANSTO requires its suppliers to adhere to the same high ethical standards. Our 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 to enable 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 the risks of modern slavery practices in the workforce recruitment, 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 workforce recruitment, 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 Fair Call, an independently monitored reporting service.

As part of continuous improvement and business as usual practices ANSTO has:

- Maintained the Approach to Market template to require compliance with modern slavery laws via returnable schedules.

- Maintained the vendor creation template forms to include checklists to screen vendors as part of the supplier enablement process to provide modern slavery statements.
- Maintained the functionality of the Procurement technology database to record & store Modern Slavery Statements under the vendor records.
- Conducted regular awareness training with all ANSTO staff involved in the Sourcing & 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:

- Quantitatively analysed our spend data for both operations and supply chain, which considered risk based on category, industry, geography and potential intersections with vulnerable people.
- Qualitatively reviewed the nature of our 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. The reviews are documented and stored in the Procurement database.
- Tracked and monitored staff training with respect to modern slavery.
- Finalised a review of our Procurement contracts and introduced stronger Modern Slavery clauses and the procurement process flow including the supplier performance.

Continuous Improvement Initiatives

ANSTO took 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 a continued focus on the following areas over the next 12-month reporting period.

- Maintain the level of training including new staff on the awareness and application of modern slavery risk treatments by ANSTO staff in their recruitment, procurement and contract management activities;
- Promote human rights due diligence across the organisation;
- Further segment suppliers into different risk categories based on the type or manufacturing location of what they supply to ANSTO;
- Continue to expand the risk-based vendor checks to lower levels in the supply chain 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; and
- Continue to maintain a Sustainable Procurement Working Group with oversight of modern slavery risks within our goods and services contracts.

Approval

The Board is the 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 black ink, appearing to read 'Michael Quigley', is written over a light blue horizontal line.

Mr Michael Quigley AM
Board Chair

5 December 2024