

Think modern slavery doesn't matter to you, think again



We get it, the Commonwealth Modern Slavery Act) (that we wrote about [here](#)) has a \$100 million annual threshold for reporting requirements. Your organisation doesn't turn over that much so yippee you get to tune out... Well, not quite.

The Act requires large organisations to report on the risk of modern slavery in their supply chain. Unless you are operating in a vacuum, at least one of your customers is bound to report (or one of their customers, or one of their customer's customers, geddit?). A supply chain is literally a chain, and if at least one of the businesses up the chain from you is bound by the Act, you will probably be asked about risks of slavery in your own chain.

There is, and should be, nowhere to hide. Investigations of smaller businesses that make up reporting entities' supply chains are already occurring and many reporting entities are passing down obligations via their supply contracts. Sooner or later you will be asked about your supply chain!

Not investigating your supply chain could lead to reputational and legal risks and potential damage to, or even loss of, commercial relationships. Ouch.

If you really want to get ahead of the game, you can voluntarily report under the Act or otherwise think about embedding the UN guiding principles on business and human rights into your supply chain.

To prep for the effects of the Act or just to get ahead of the game we recommend the following:

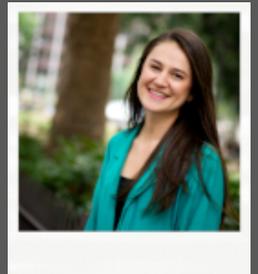
- map your operations and supply chains as far as you can.
- conduct audits and due diligence to assess the risk of modern slavery in your supply chain.
- introduce an anti-slavery policy and/or a modern slavery action plan.
- incorporate obligations under the modern slavery legislation into your supplier contracts so that if you're asked to assist an organisation you supply to, you can ask organisations who supply to you to assist you too.
- consider voluntarily reporting under the Act. Good business, and just good.

Questions? Give us a call.



Justin Cudmore
Partner

+612 8216 3015
[Email Justin](#)



Emilie Blake
Lawyer

+61 8216 3060
[Email Emilie](#)

Marque Lawyers Pty Ltd
Level 4, 343 George St
Sydney NSW 2000

Ph : +61 2 8216 3000
Fax: +61 2 8216 3001

[Visit Website](#)

