



17 May 2017

Committee Secretary  
Joint Standing Committee on Foreign Affairs, Defence and Trade  
PO Box 6021  
Parliament House  
Canberra ACT 2600

Email: [jscfadt@aph.gov.au](mailto:jscfadt@aph.gov.au)

Dear Committee Secretary,

**Re: Inquiry into establishing a Modern Slavery Act in Australia**

The Qantas Group (the Group) is pleased to respond to the Joint Standing Committee on Foreign Affairs, Defence and Trade, Trade Subcommittee's request for submissions into its inquiry into establishing a Modern Slavery Act in Australia.

The Group is committed to implementing policies and procedures that meet its moral and ethical obligation to end all forms of modern slavery including servitude, forced and compulsory labour and human trafficking. We welcome the Joint Standing Committee's inquiry and efforts to drive transparency and identify international best practice for the prevention of modern slavery throughout businesses and supply chains.

The Group operates regional, domestic and international services to 25 countries, employs over 30,000 people and has in excess of 10,000 suppliers. The Group's portfolio also includes Jetstar, Qantas Freight and Qantas Loyalty

We are supportive of an appropriately scoped Modern Slavery Act in Australia, drafted in alignment with the United Kingdom's *Modern Slavery Act (2015)*. The Group's 2016 Modern Slavery Statement pursuant to that Act is available on our home page. It provides an overview of our commitment to end any form of modern slavery in our business and supply chain and to continuous improvement in the development of codes of practice, procedures, requirements and risk assessment and monitoring frameworks that address issues of modern slavery.

For the purposes of this submission we have commented on the following Terms of Reference:

- Identifying international best practice employed by governments, companies, businesses and organisations to prevent modern slavery in domestic and global supply chains, with a view to strengthening Australian legislation;
- Provisions in the United Kingdom's legislation which have proven effective in addressing modern slavery, and whether similar or improved measures should be introduced in Australia; and
- Whether a Modern Slavery Act should be introduced in Australia.

**Best practice**

The Group is committed to best practice in all that it does. We recognise the inherent dignity of our staff and the people working in our supply chains and each person's rights to freedom, justice and fair work conditions. To address modern slavery in our business and supply chains, key documents establish essential standards of personal and corporate conduct and behaviour expected of everyone who works for and with the Group.



Under the Qantas Group Code of Conduct and Ethics, the Group is committed to building and fostering a culture in which diversity is valued and to providing a workplace that is safe and respectful. This means that Group Employees must treat other employees, customers and suppliers and other people with trust, dignity, respect, fairness and equity.

We have established an effective whistle-blower reporting and investigation framework for employees to report breaches of any law, regulation, or any Qantas Group Policy. We take all reports of any breach of law, regulation or policy very seriously.

The Group seeks to act ethically and with integrity in all our business relationships and ensures that its procurement practices are transparent, fair and responsible. We require each supplier to adhere to its Supplier Requirements, which mandate that suppliers 'will not use child labour; and/ or use forced labour or involuntary labour.'

We recognise that continuous improvement in the development of codes of practice, procedures, requirements and risk assessment and monitoring frameworks that address issues of modern slavery is critical and we are committed to ensuring this occurs.

### **Provisions in the United Kingdom's legislation which have proven effective in addressing Modern Slavery, and whether similar or improved measures should be introduced in Australia**

There is a clear regulatory trend requiring larger organisations to, at a minimum, focus on modern slavery and report how modern slavery is being addressed in their business and supply chains.

The requirement under Section 54 of the UK *Modern Slavery Act* for businesses to publish an annual Statement outlining how the business addresses modern slavery, signed by a member of the Board, and made public, is a positive measure the Group supports. We see this as an opportunity to demonstrate to our investors and customers our strong commitment and approach to ensuring our business and supply chain do not harbour any forms of modern slavery.

To ensure increased transparency and accountability, consideration should be given to creating a central on-line repository accessible to the public for maintaining all modern slavery statements.

### **Whether a Modern Slavery Act should be introduced in Australia**

The Group supports the introduction of a Modern Slavery Act in Australia. As with the UK *Modern Slavery Act*, we see this as an opportunity for all organisations to consider the social impact of their operations and enable industry-wide transparency on modern slavery in business.

Although the Group supports similar reporting requirements in the proposed Australian legislation to the current UK *Modern Slavery Act*, we are concerned with the potential duplication of reports companies will be required to draft and publish to meet the requirements of these Acts and potentially future parallel legislation around the world. We recommend steps are taken to avoid this duplication.

We understand the introduction of a Modern Slavery Act in Australia will complement already existing laws, including the existing provisions under Australia's Criminal Code which criminalise modern slavery. The Group considers the introduction of a Modern Slavery Act in Australia is an opportunity for Australia and Australian companies to show leadership in our global region on this issue.

Yours sincerely,

**Andrew Parker**  
Group Executive Government, Industry and International Affairs