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| Supplier assessment questionnaire  Guidance for suppliers |

We have developed this guidance to assist you to complete our Supplier Assessment Questionnaire (SAQ).

At CPA Australia, we procure goods and services from a wide range of suppliers. We expect all our suppliers to take steps to manage potential and actual modern slavery risks in their operations and supply chains, as well as other risks of human rights harm.

We use this SAQ to help us understand how our suppliers are managing their modern slavery risks by asking for information through six questions. We understand that every supplier is different and that the actions taken by small suppliers to manage these risks may differ from larger suppliers, including due to differences in size and capacity. To assist you to complete this SAQ, we have outlined the types of actions we expect from smaller and larger suppliers for each question.

It is important that you respond to the SAQ questions honestly. If you are unable to respond to a question, we may contact you to better understand your situation. However, this does not necessarily mean we will not choose to work with you.

### Learn more?

There are a range of free resources and tools to support your entity to identify and manage modern slavery risks.

* The UN’s [Global Estimates of Modern Slavery: Forced Labour and Forced Marriage](https://publications.iom.int/books/global-estimates-modern-slavery-forced-labour-and-forced-marriage#:~:text=The%202021%20Global%20Estimates%20indicate%20there%20are%2050,one%20of%20every%20150%20people%20in%20the%20world.) and the Walk Free Foundation’s [Global Slavery Index](https://www.walkfree.org/projects/the-global-slavery-index/) explain how modern slavery can occur in business’ operations and supply chains.
* The Australian Government’s [guidance](https://www.homeaffairs.gov.au/criminal-justice/files/modern-slavery-reporting-entities.pdf) about the Modern Slavery Act explains key actions your entity can take to manage modern slavery risks.
* The Australian Government’s [online register](https://modernslaveryregister.gov.au/) includers modern slavery statements from large Australian and global businesses required to report under the Modern Slavery Act.
* The Walk Free Foundation’s [online toolkit](https://www.walkfree.org/projects/business-and-investor-toolkit/) also includes a range of free resources to support businesses to understand and manage their modern slavery risks.

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| SAQ Question | What do we expect from you as our supplier? | |
| 1. **Is your organisation required to comply with the Modern Slavery Act 2018 (Cth) (Modern Slavery Act)? If yes, please attach the latest modern slavery statement.** | **Why are we asking this question:** to help us to understand whether your entity is required to report under the Modern Slavery Act and, if so, confirm that your entity has complied with this requirement. CPA Australia is also required to report under the Modern Slavery Act and you can view our statement [here](https://www.cpaaustralia.com.au/about-cpa-australia/governance/modern-slavery-statement). | |
| **Larger supplier (over AU$100 million annual revenue):** if your entity is a larger supplier operating in Australia, we expect you to comply with the Modern Slavery act by preparing an annual modern slavery statement (statement).  This statement should meet all the mandatory criteria for content set out in the Modern Slavery Act, including by describing your entity’s modern slavery risks, actions to manage these risks, and how your entity assesses the effectiveness of its actions. We expect that your statement will be similar or better quality to other peers in your sector and will be at least 5-7 pages in length.  If your entity is not required to report under the Modern Slavery Act, please explain why in your response to this question. | **Smaller supplier (under AU$100 million annual revenue):** if your entity is a smaller supplier, you will not be required to report under the Modern Slavery Act. However, we encourage you to consider making a voluntary statement. The Australian Government’s [guidance](https://www.homeaffairs.gov.au/criminal-justice/files/modern-slavery-reporting-entities.pdf) about the Modern Slavery Act explains how to report voluntarily.  If your entity is not currently in a position to make a voluntary statement, you could also consider committing to make a statement in the future. Please explain in your response to this question whether you have or plan to make a voluntary statement. |
| **Please provide your response here.** | |
| 1. **Please confirm that your organisation is not aware of any ongoing investigations or charges within its supply chain in relation to modern slavery and other abuses.** | **Why are we asking this question:** to help us to understand whether any issues have been identified in your supply chain that we should be aware of. We understand that modern slavery and other human rights abuses can occur in any supply chain. If you are aware of an investigation or charge, we will work with you to understand the issues and how you are responding. | |
| **Larger and smaller suppliers:** it is important you advise us of any investigations or charges relating to modern slavery or other human rights abuses in your supply chain. This could include instances of modern slavery practices such as forced labour or debt bondage, as well as other human rights abuses such as underpayment, excessive working hours, or discrimination and harassment relating to workers. You do not need to advise us of current or past media reporting relating to modern slavery risks in your sector generally, unless these reports name your entity or an entity in your supply chain.  If you are aware of a previous investigation or charge that has now been resolved, it is also important that you explain to us what steps you have taken to ensure these issues will not reoccur. | |
| **Please provide your response here.** |  |
| 1. **Please provide information relating to action taken/planned to tackle modern slavery and other abuses within your organisation and the supply chains involved in the delivery of the proposed services.** | **Why are we asking this question:** to help us to understand whether your entity is taking appropriate steps to manage modern slavery and broader human rights risks in your operations and supply chains. We do not expect you to be able to certify that your supply chains are free from slavery and other human rights impacts. However, it is important that you can demonstrate that you are working to understand and manage modern slavery and other human rights risks and that the actions you are taking align with your modern slavery risk profile. We also understand that entities may be at different stages of implementing their response and encourage you to explain how you plan to further improve your response going forward. | |
| **Larger supplier (over AU$100 million annual revenue):** we expect that your entity is actively working to understand and manage modern slavery and broader human rights risks and that you are able to explain key actions in your response to this question. If your entity is required to report under the Modern Slavery Act, your statement should outline the key actions your are taking, which you can briefly summarise here.  In general, we expect suppliers to have taken (or have plans to take) the following actions to manage modern slavery or broader human rights risks: establish policies addressing these issues; use contact clauses with sub-suppliers / contractors to set clear expectations; deliver relevant training for internal staff; maintain a grievance mechanism for workers (such as a whistleblowing hotline); and engage with subcontractors and suppliers to better understand their risk profiles (such as a supplier due diligence process). | **Smaller supplier (under AU$100 million annual revenue):** we recognise that the actions your entity can take to manage modern slavery and other human rights risks may be limited by your size and capacity. At a minimum, we expect that your entity has policies in place to support you to respect the rights of your workers (such as an employment policy), which address modern slavery or issues relevant to modern slavery, such as setting requirements for free and fair working conditions. Please briefly identify and explain any relevant policies in your response to this question.  In some cases, your entity may operate in a higher risk sector for modern slavery, such as cleaning and property management; hospitality; ICT products and services; construction and maintenance services; merchandise; and office consumables. If your entity operates in one or more of these sectors, please also explain any additional steps you are taking to support you to manage modern slavery and other human rights risks. This could include any checks on suppliers, development of contract clauses, or requirements for subcontractors providing workers to support your operations. |
| **Please provide your response here.** | |
| 1. **Please provide details relating to the provision of training on modern slavery and other abuses for employees and personnel with responsibility for supply chain management in respect of the workers and supply chain that will deliver the services.** | **Why are we asking this question:** to help us understand whether key personnel within your entity are aware of modern slavery and other human rights risks and the actions they can take to help manage these risks. | |
| **Larger supplier (over AU$100 million annual revenue):** we expect that your entity provides internal training about modern slavery as either standalone training or as part of training on wider human rights issues. This training could be provided in person or online and by internal or third-party presenters.  In response to this question, you should be able to explain the training content, who within your entity receives this training, and how often the training occurs. In general, we would expect the level of detail and frequency of the training to align with your entity’s modern slavery risk profile. For example, entities operating in higher risk sectors for modern slavery (such as provision of lower skilled services) may need to provide more sophisticated training than entities in lower risk sectors. | **Smaller supplier (under AU$100 million annual revenue):** we generally expect that your entity provides at least limited training to some or all employees about modern slavery or broader human rights issues. This could include more general training that is not focused on modern slavery but covers relevant issues that help to safeguard against modern slavery such as health and safety and fair working conditions. Please outline any relevant training in your response to this question.  In some cases, we understand that it may not be practicable to provide training about modern slavery or broader human rights issues, including where your entity has a very small number of employees. If you do not currently provide training in this area, please explain why this is the case. |
| **Please provide your response here.** | |
| 1. **How would your organisation respond to any allegation of modern slavery or substandard working conditions in its operations or supply chains?** | **Why are we asking this question:** to help us to understand whether you would be able to respond effectively to an allegation of modern slavery or substandard working conditions relating to your operations or supply chains. | |
| **Larger supplier (over AU$100 million annual revenue):** we expect that you have considered how your entity would respond to an allegation of modern slavery or substandard working conditions. If your entity does not already have a written modern slavery response plan, we encourage you to develop one.  In response to this question, you should be able to briefly explain the key steps your entity would take in this scenario, including how you would work to investigate the allegation, as well as what you would do to remediate the harm caused and ensure a similar incident could not occur in future. You should also be able to outline how you would manage your response internally, such as through a cross functional working group. | **Smaller supplier (under AU$100 million annual revenue):** we expect that you are able to identify the basic steps that your entity would take to respond to any allegation of modern slavery or substandard working conditions in your operations or supply chains. This may include contacting Government authorities and taking steps (where possible) to support any victims. Please explain these steps in your response to this question.  If you have not previously considered how you would respond to this type of allegation, please explain whether you plan to consider this issue in future and how you will do so. This could include explaining whether you would use existing processes within the business or develop a stand alone plan. |
| **Please provide your response here.** | |
| 1. **Does your organisation engage in any other due diligence activities to identify, prevent and mitigate risks specific to modern slavery in its operations and supply chains? If so, please describe these activities.** | **Why are we asking this question:** to provide you with an opportunity to explain any other actions you are taking or plan to take in the future that support you to manage modern slavery risks. | |
| **Larger and smaller suppliers:** please identify any relevant actions you are taking to manage modern slavery risks not already outlined above. If you have described all relevant actions in your response to Question 3, you do not need to repeat this information here. | |
| **Please provide your response here.** | |
| 1. **What steps does your organisation take to prevent fraud and corruption in its operations and supply chains? Please describe these steps.** | **Why are we asking this question:** to help us understand the steps you are taking to prevent fraud and corruption. These are illegal practices and can facilitate and enable modern slavery. Examples of fraud and corruption include bribery and serious conflicts of interest. CPA Australia has a [Fraud and Corruption Policy](https://www.cpaaustralia.com.au/about-cpa-australia/governance/fraud-and-corruption-policy#:~:text=CPA%20Australia%20will%20not%20tolerate,the%20alleged%20offence%20has%20occurred.) which is available online. | |
| **Larger and smaller suppliers:** please identify any relevant actions you are taking to manage fraud and corruption. This could include implementing policies prohibiting fraud and corruption, providing training for employees about fraud and corruption, and prohibiting fraud and corruption in contracts with suppliers. | |
| **Please provide your response here.** | |