

Hawiti Tufa from Ethiopia had been living in severe pain for more than a year before receiving trachoma surgery from a doctor trained by The Fred Hollows Foundation.



The Fred Hollows
Foundation

MODERN SLAVERY STATEMENT

Traditional Owner Reggie Uluru travelled 460km by bus from his community at the base of Uluru to access cataract surgery at Alice Springs Hospital.



VISION & VALUES



WHO WE ARE

The Fred Hollows Foundation is an international development organisation which has worked in some of the world's most remote and under-served communities for over 30 years. We are independent, not-for-profit, politically unaligned and secular.



OUR VISION

A world in which no person is needlessly blind or vision impaired.



OUR PURPOSE

To deliver bold eye health solutions that transform lives.

We work around the world so that no one is left behind, and in Australia we work tirelessly to ensure that Aboriginal and Torres Strait Islander people can always exercise their right to sight, good health and self-determination.

In addition to delivering life-changing surgeries and treatments, our priority is to strengthen health systems around the world. We do this by training local doctors and health workers and collaborating with governments and local health organisations in the countries where we work.



OUR VALUES

Our values of Integrity, Empowerment, Collaboration, Action and Resourceful underpin every aspect of our work both in Australia and around the globe.

INTRODUCTION

As an Australian entity with annual revenue over \$100m in 2023, The Fred Hollows Foundation ABN 46 070 556 642 (The Foundation) is required to publish a Modern Slavery Statement under the Modern Slavery Act 2018 (Cth).

This Modern Slavery Statement (Statement) reports on The Foundation's activities to address the risks of Modern Slavery in its operations and supply chains for the financial year 1 January to 31 December 2023 and was prepared by The Foundation's Modern Slavery task team.

The Foundation's Board is committed to taking action to address Modern Slavery throughout the organisation, to make improvements internally and to model responsible corporate behaviour, and to collaborate with partners to create positive change. The Foundation condemns all forms of Modern Slavery and will take a human rights-based approach to tackling Modern Slavery risks in its operations and supply chains. In this Statement we refer to Modern Slavery using the definition by the Australian Department of Home Affairs:

Modern slavery describes situations where offenders use coercion, threats or deception to exploit victims and undermine their freedom.

Practices that constitute Modern Slavery can include:

- human trafficking
- slavery
- servitude
- forced labour
- debt bondage
- forced marriage, and
- the worst forms of child labour¹¹

All images in this statement are representative of The Foundation's work generally and do not reflect people who have experienced modern slavery.

¹¹ <https://www.homeaffairs.gov.au/criminal-justice/Pages/modern-slavery.aspx#:~:text=Expert%20Advisory%20Group-,Overview,victims%20and%20undermine%20their%20freedom.>

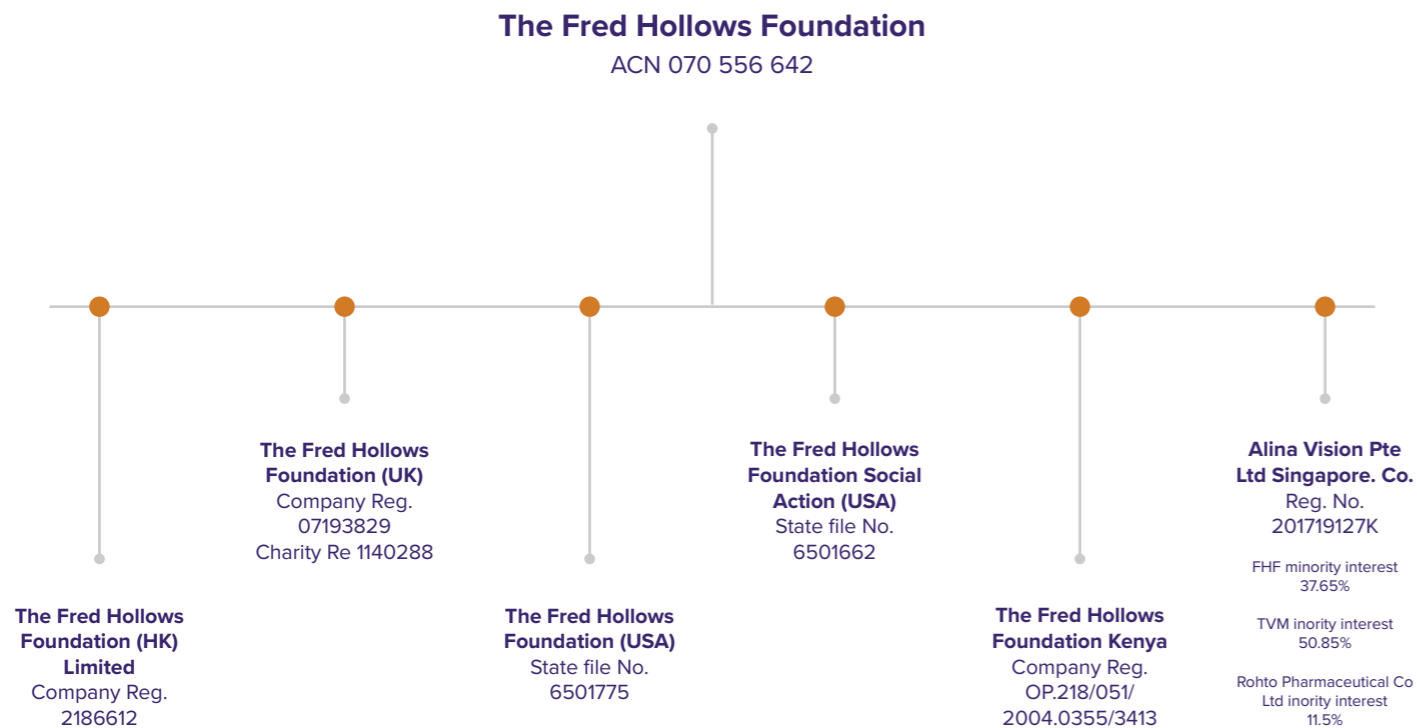
STRUCTURE

The Fred Hollows Foundation is an independent, not-for-profit, politically unaligned, and secular international development organisation working towards eliminating avoidable blindness around the world. Founded in 1992 to carry on the work of the late Professor Fred Hollows, world-renowned eye doctor and humanitarian, the eponymous Foundation today implements sight-saving programs in over 25 countries worldwide.

The Fred Hollows Group consists of related entities in Australia, Hong Kong, Kenya, UK and USA. The Foundation also has a minority interest in a Singapore entity with eye health operations in Vietnam. These entities come together in a governance model based on principles of tight integration and local empowerment; working together we can be greater than the sum of our parts.

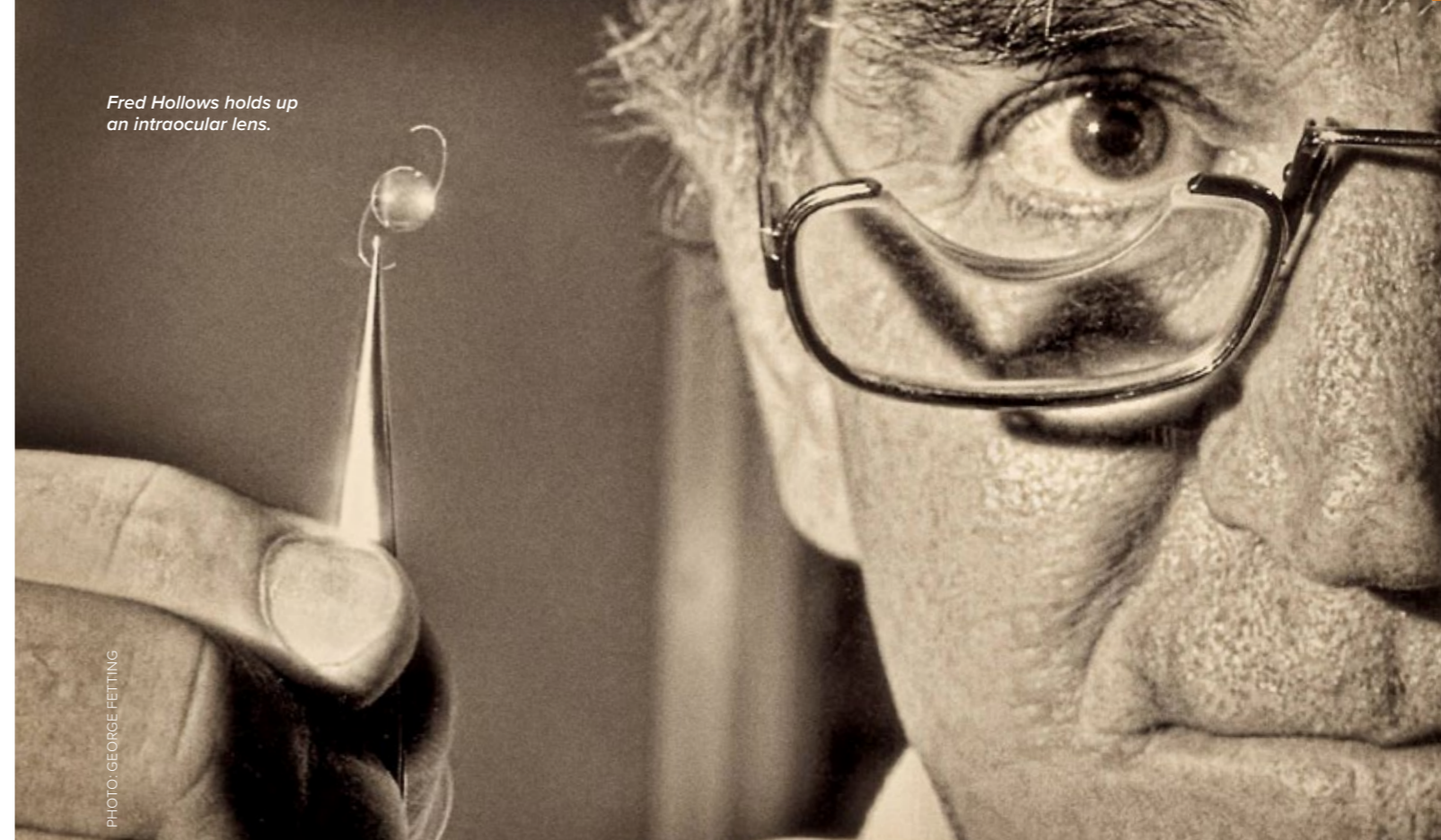
THE FRED HOLLOWS FOUNDATION GROUP

Last updated 2 April 2024



The Foundation and each entity enter into a Collaboration Agreement that seeks to ensure a shared purpose and global synergy between entities whilst encouraging empowerment.

The Foundation is fully accredited by the Australian Government's Department of Foreign Affairs (DFAT) and Trade and is a recipient of funding under DFAT's Australian NGO Cooperation Program. The Foundation is also a signatory to the Australian Council for International Development's (ACFID) Code of Conduct.



Fred Hollows holds up an intraocular lens.

PHOTO: GEORGE FETTING

OPERATIONS

The Foundation is a global organisation with its head office in Sydney and branch offices in 13 countries with programs delivered in over 25 countries.

The Foundation is led by its Board, CEO and Executive Leadership Team (ELT). Country Managers and other leaders inform the ELT through the Programs and Public Affairs Executive Directors as thematically appropriate. Globally The Foundation has 410.9 FTE employees.

Our activities are conducted through partnerships with local organisations, 75% of which are government entities.

SUPPLY CHAINS

Generally, each international branch office and the corporate global office undertake their procurement and manage their own accounts payables. When support is required from each international branch office, the corporate global office undertakes account payables on behalf of international offices. This provides flexibility and autonomy to branch offices while also centralizing support and expertise when required.

Direct procurement ranges from small stationery items to complex medical equipment purchased at times on behalf of our implementing partners for logistical reasons.

MODERN SLAVERY RISKS – OPERATIONS

The Foundation predominantly operates through its branch offices some of which are located in countries

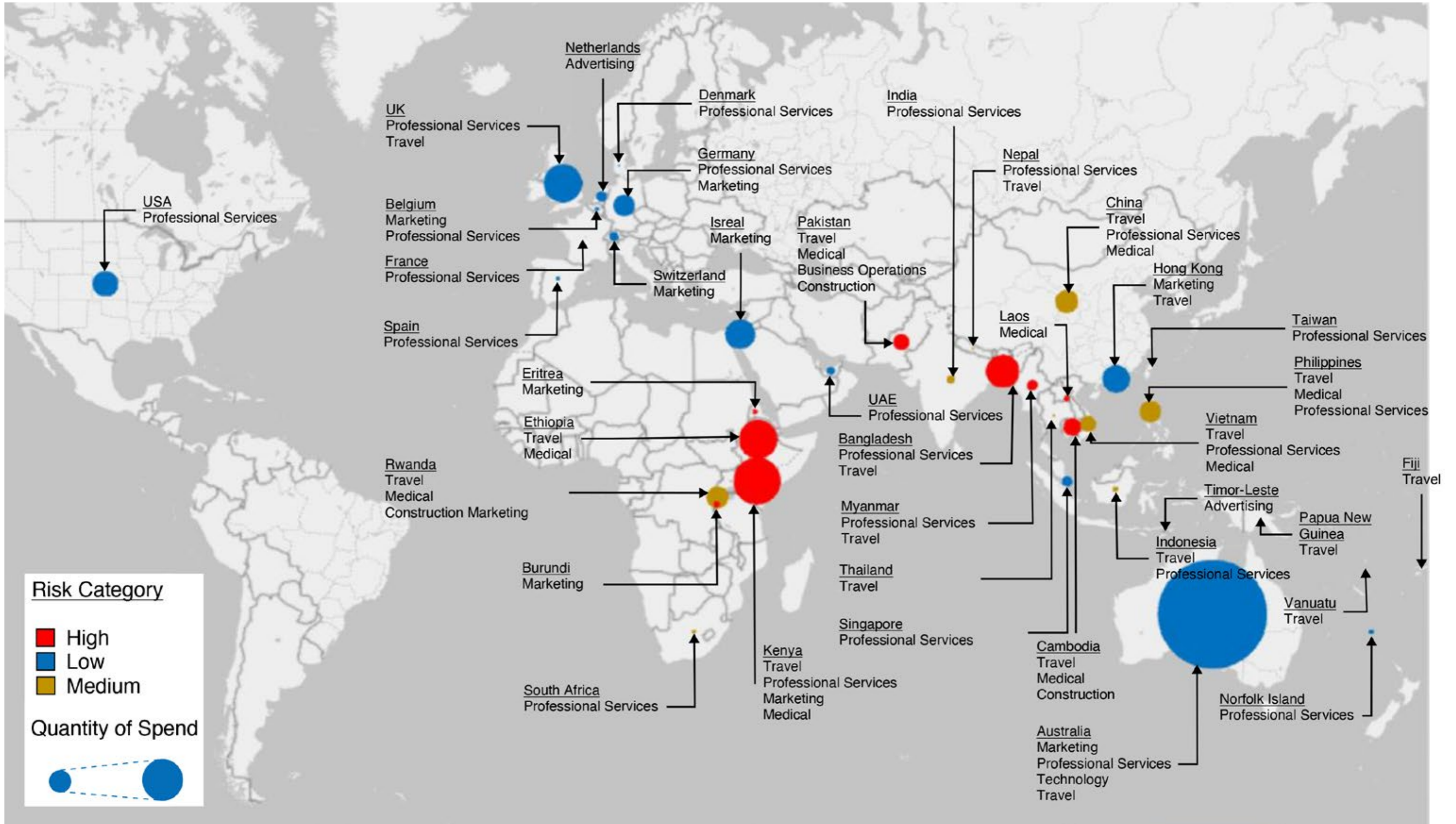
that are considered high-risk locations. For example, Pakistan, Bangladesh, Eritrea where there may be a weak rule of law or high conflict areas which can create an environment where Modern Slavery practices thrive. Associated risks for these branch offices relate to any contracted workforce engaged within that office because there may not be a high standard of labour practices (including recruitment) within that context.

Whilst The Foundation has a Speak-Up Policy in place that encourages a speaking up culture, we acknowledge a lack of accessibility to some primary beneficiaries who may not have internet access. Further, we note that while translators will be promptly arranged a complainant may not have immediate access to a person fluent in their own language as part of our complaints handling procedure. This increases the risk of Modern Slavery going undetected in our operations.

MODERN SLAVERY RISKS – SUPPLY CHAIN

Modern Slavery risks identified within the first tier of the supply chain include global travel and accommodation, IT software and hardware, merchandise such as clothing used for the promotion of The Foundation, cleaning services, hospitality services and medical equipment. Due to current e system limitations, we are not yet able to extract data breakdown for a handful of expenditure categories including hospitality, cleaning, medical equipment and textiles / clothing. However, we are working towards this through pipeline system upgrades and we endeavour to improve our data capabilities in coming yearst:

WORLD MAP



Patients in Vietnam's Quang Tri province test their restored vision one day after surgery.

ACTIONS TO ADDRESS MODERN SLAVERY RISKS

The Foundation is committed to acting ethically and with integrity in our business relationships. This includes taking steps to ensure that there is no Modern Slavery in any part of our business or in our supply chain. A small cross-divisional task team has been working together on actions to address Modern Slavery.

Several of The Foundation's global policies have elements that touch on matters relating to Modern Slavery, demonstrating our commitment to the well-being of everyone with whom The Foundation comes into contact.

- Safeguarding People Policy – express provisions relating to Modern Slavery
- Financial Crime Policy – whilst Modern Slavery is not expressly mentioned, there is an acknowledged link between it and financial crime to which we have zero tolerance
- Human Rights, Equity and Inclusion – commitment to the universal principles of Human Rights
- Procurement Policy – aspiration to following ISO 20400 principles of sustainable procurement.

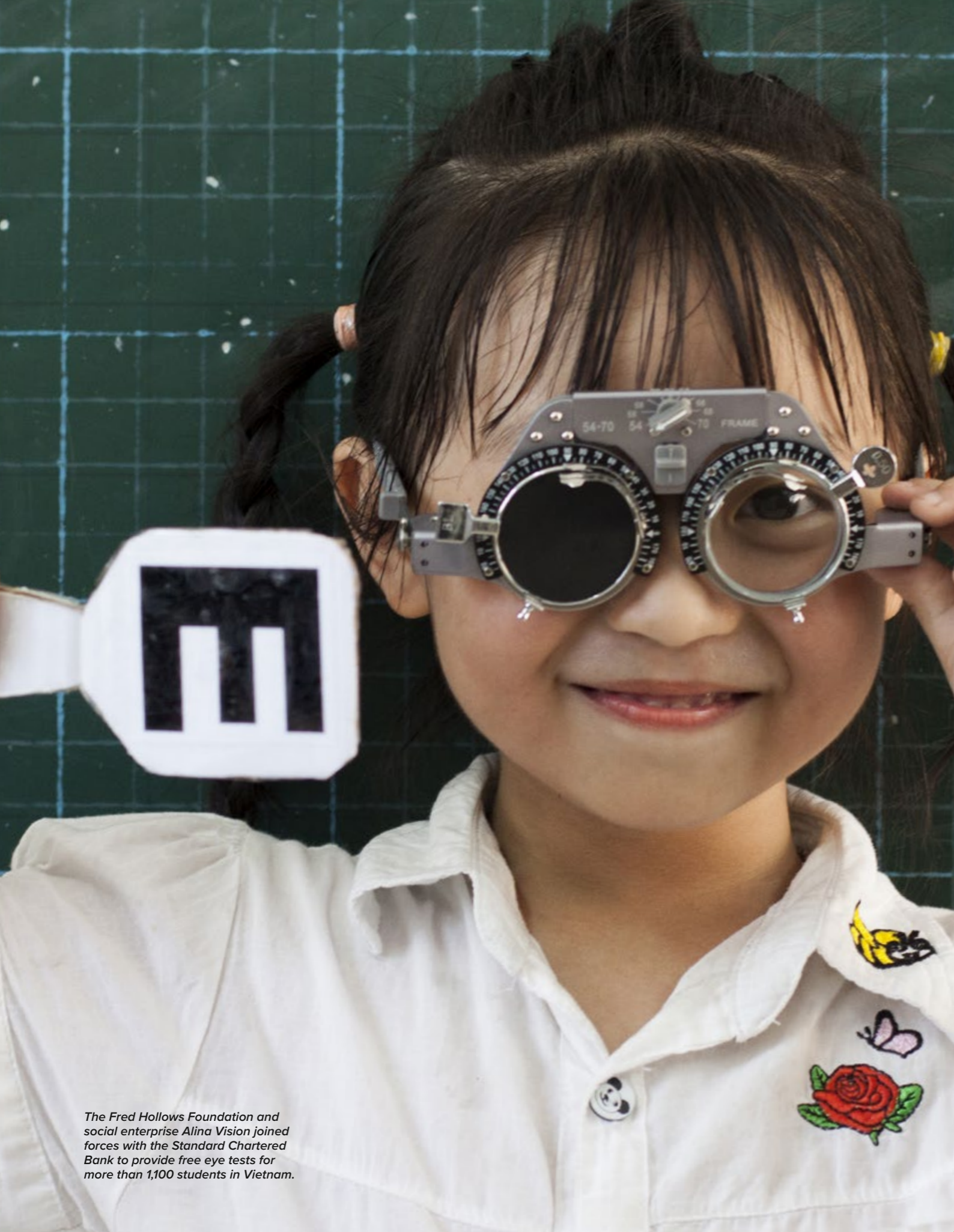
As part of our commitment in 2023 we commenced a review of our current systems and policies to identify and assess potential areas for improved actions, which led to the process of developing a "Code of Conduct" and "Supplier Self-assessment Questionnaire" with the aim to work with our service providers, suppliers, and contractors to share our commitment to act lawfully and ethically. These documents and processes are under review, with the Code of Conduct planned to be implemented in 2024. We have started to investigate options to support our supplier due diligence processes to suit The Foundation's operational footprint and eye to charitable expenditure ratios. We aim to review and potentially incorporate into our technology roadmap over the next 24-36 months.

In 2023 The Foundation conducted several virtual Safeguarding People training sessions for Implementing Partners and staff separately, the content of which includes information on Modern Slavery. The Implementing Partner sessions throughout the year were attended by over 200 people, including stand-alone virtual sessions for Solomon Islands, Kenya and Myanmar. In person trainings were conducted in the Philippines and Kenya.

As part of The Foundation's risk management process all third parties, including our implementing partners, any recruitment agencies, and all employees are screened through the World Check One platform. This platform screens for alerts relating to human trafficking offences, among other areas of concern, against publicly available data sources and screenings are conducted on an ongoing basis.



PHOTO: SANDY SCHELTEMA/THE AGE



The Fred Hollows Foundation and social enterprise Alina Vision joined forces with the Standard Chartered Bank to provide free eye tests for more than 1,100 students in Vietnam.

All relevant Foundation contract templates include clauses that require third parties to, for example, take all reasonable steps to ensure that there is no modern slavery or human trafficking in the Supplier's or its subcontractors' supply chains or in any part of their business.

The Foundation uses recruitment agencies only on a very limited basis to support where it becomes necessary. In 2023 9 staff were recruited in this manner. All international job advertisements include advice that "Fred Hollows Foundation will never ask for a fee during any stage of the recruitment process."

To address risk within The Foundation's investment portfolio The Foundation takes an approach which is intended to achieve returns consistent with its risk appetite whilst incorporating consideration of Environmental, Social and Governance (ESG) objectives. The Foundation supports the United Nations Principles for Responsible Investment (UNPRI). The Foundation has made a commitment to adopt and implement the UNPRI, consistent with its fiduciary responsibilities.

In 2023, BCD was elected as our global travel management company partner. BCD travel integrates ESG factors into its booking process, with a particular emphasis on environmental sustainability. We also prioritise consideration of ESG when evaluating and selecting a supplier, and similarly, when procuring laptops for the organisation we consider suppliers' Modern Slavery statements as part of the selection process.

The Foundation has been a member of the Modern Slavery Charities and NFP Forum since it was formed in 2021. This group's purpose is to collaborate and support those working on this issue for their respective organisations within the Not-for-profit sector.

EFFECTIVENESS OF ACTIONS

Assessment of the effectiveness of our actions in 2023 includes only those actions where effectiveness could be measured. As such, awareness-raising was the most significant action undertaken throughout 2023 in that numbers of attendees at Safeguarding People training sessions are recorded.

- Global orientation videos were provided to 92 new starters.
- The main virtual training session conducted for implementing partners was attended by over 200 logged in users which may have included multiple participants under one login, for example hospital training rooms.

The above activities will be assessed on an annual basis.

CONSULTATION

Given the nature and structure of The Foundation, being that all related entities are now wholly owned or controlled subsidiaries, specific entity consultation is deemed to be not required. Consultation on the Modern Slavery Statement is conducted through The Foundation's global Safeguarding Forum.

OTHER INFORMATION

Future planning for The Foundation's approach to tackling modern slavery in its operations and supply chains over the coming year/s include:

- Socialise and implement the Code of Conduct.
- Review and assessment of Internal Audit process to identify potential opportunities to incorporate considerations of modern slavery.
- Improving access to Safeguarding People training by providing translated versions of material, live interpretations for virtual training and possibly sourcing local service providers to ensure local contextual considerations are incorporated.
- Investigate systems or platforms to support The Foundation's supplier due diligence processes.

BOARD APPROVAL

This statement was approved by The Foundation's Board at its meeting on 17 May 2024.



Jane Madden, Chair

17 May 2024



The Foundation makes a follow-up visit to screen people from a village in Baragoi, Kenya.



**The Fred Hollows
Foundation**

