



The Fred Hollows
Foundation

Modern Slavery Statement

20
24



1. INTRODUCTION

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 2024 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 labour¹*

2. VISION & VALUES

2.1. 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.

2.2. OUR VISION

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

2.3. OUR PURPOSE

To deliver bold eye health solutions that transform lives.

2.4. OUR VALUES

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

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.

¹ <https://www.homeaffairs.gov.au/criminal-justice/Pages/modern-slavery.aspx#:~:text=Expert%20Advisory%20Group-.Overview,victims%20and%20undermine%20their%20freedom.>

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.

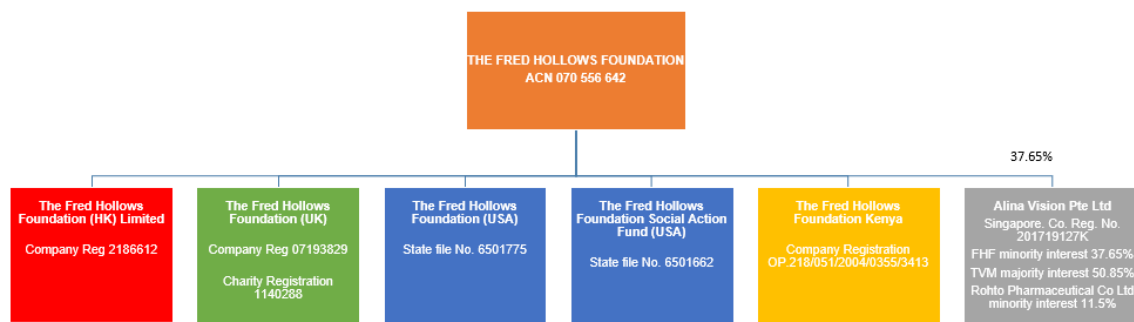
3. STRUCTURE

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.



THE FRED HOLLOWES FOUNDATION GROUP

[Last updated 2 April 2024]



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.

3.1. OPERATIONS

- The Foundation has its head office in Sydney and branch offices in 13 countries with programs delivered in over 25 countries.
- The Foundation is led by a Board, CEO and Executive Leadership Team (ELT). Globally The Foundation has 428 FTE employees.
- Our activities are conducted through partnerships with local organisations, 75% of which are government entities.

3.2. SUPPLY CHAINS

Generally, each international branch office and the corporate global office undertake their own procurement and manage their own accounts payable within the guardrails of the global office standards and procedures. On occasion the global corporate office undertakes direct accounts payable services on behalf of international offices where that office has limited capacity. This provides flexibility and autonomy to branch offices while also centralising support and expertise when required.

4. MODERN SLAVERY RISKS

4.1. OPERATIONS

The Foundation predominantly operates through its branch offices, some of which are located in countries that are considered high-risk locations 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.

The Foundation has a Speak-Up Policy in place that encourages a speaking up culture, which includes a phone number and email address. However, 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 limits our ability to detect Modern Slavery in our operations.

4.2. SUPPLY CHAIN

Our approach for this Statement is to identify the highest risks by basing the assessment of supplies on:

- High-risk location of the supplier
- High-risk industry

As such, we have identified 0.94% of suppliers within our supply chain fall into these categories, where Modern Slavery may be present in their activities or supply chains.

5. ACTIONS TO ADDRESS MODERN SLAVERY RISKS

5.1. PEOPLE

- Task Team: A small cross-divisional task team has been working together on actions to address Modern Slavery.
- Training Sessions: In 2024, The Foundation conducted several virtual Safeguarding People training sessions for Implementing Partners and staff separately, including information on Modern Slavery. Globally 122 new starters viewed this training. Over 200 people attended the Partner training sessions, with stand-alone virtual sessions for partners from Pakistan, Jordan, Afghanistan, and Palestine. In-person trainings were also conducted in Bangladesh and Kenya. Excluding Kenya (low prevalence) and Palestine (limited data), these are high-risk locations and providing this training is one means by which we have mitigated risks in our operations.
- Recruitment: The Foundation uses recruitment agencies on a limited basis. In 2024, 3 staff were recruited this way. All international job advertisements include advice that “The Fred Hollows Foundation will never ask for a fee during any stage of the recruitment process.”

5.2. PROCESSES

- Global Policies: Several of The Foundation’s global policies touch on matters relating to Modern Slavery:
 - Safeguarding People Policy: Express provisions relating to Modern Slavery.

- Financial Crime Policy: Acknowledged link between Modern Slavery and financial crime.
- Human Rights, Equity and Inclusion: Commitment to universal principles of Human Rights.
- Procurement Policy: Aspiration to follow ISO 20400 principles of sustainable procurement.
- Supplier Code of Conduct: Implemented updated Supplier Code of Conduct (Working Together Principles) included in main goods and services agreement templates. Engaged 126 third parties under these templates in 2024.
- Risk Management: All third parties, including implementing partners, recruitment agencies, and employees, are screened through the World Check One platform for alerts relating to human trafficking offences and other areas of concern.
- Contract Clauses: All relevant Foundation contract templates include clauses requiring third parties to take all reasonable steps to ensure no modern slavery or human trafficking in their supply chains or business.

5.3. SYSTEMS

- Investment Portfolio: The Foundation addresses risk within its investment portfolio by incorporating Environmental, Social, and Governance (ESG) objectives. Supports the United Nations Principles for Responsible Investment (UNPRI) and has committed to adopt and implement the UNPRI.
- Travel Management: The global travel management company partner, BCD travel, integrates ESG factors into its booking process, emphasizing environmental sustainability.
- Supplier Evaluation: ESG considerations are prioritized when evaluating and selecting suppliers, including reviewing suppliers' Modern Slavery statements when procuring laptops for the organization.
- Modern Slavery Charities and NFP Forum: The Foundation has been a member since its formation in 2021, collaborating and supporting those working on Modern Slavery issues within the Not-for-profit sector.

6. EFFECTIVENESS OF ACTIONS

Assessment of the effectiveness of our actions in 2024 includes only those actions where effectiveness could be measured. As such, awareness-raising was the most significant action undertaken throughout 2024.

- Global Orientation Videos: Provided to 122 new starters.
- Virtual Training Sessions: The main virtual training session conducted for implementing partners was attended by around 200 logged-in users, which may have included multiple participants under one login, such as hospital training rooms.

The above activities will be assessed on an annual basis.

We also assess the effectiveness of our actions through various qualitative assessments, including:

- Internal Audit: Regular internal audits are conducted to review and evaluate our processes and policies. These audits help identify areas for improvement and ensure compliance with our standards.
- Board Review: Our Board of Directors regularly review our initiatives and progress. This oversight ensures that our strategies are aligned with our ethical commitments and organizational goals.

Through these monitoring functions, we strive to continuously improve our approach to addressing Modern Slavery and uphold our commitment to ethical and responsible business practices.

7. CONSULTATION

Given the nature and structure of The Foundation, being that all related entities are now wholly owned or controlled subsidiaries or where The Foundation is a minority shareholder, specific entity consultation is deemed to be not required.

8. OTHER INFORMATION

Actions The Foundation is committed to in the coming year/s include:

2025

Engage with identified high-risk suppliers with whom we spent the highest amounts – either via supplier questionnaire or direct conversation, as appropriate in the context

Conduct at least 2 awareness-raising activities for staff engaged in procurement

Medium-Long Term

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 for potential incorporation into our Technology Roadmap.

Improve monitoring and awareness of Supplier's Modern Slavery obligations by:

- 1) ensuring that suppliers are educated and have a clear understanding of the code of conduct,
- 2) establishing clear communication channels to make sure questions or concerns are addressed quickly,
- 3) monitoring compliance by regular audit checks; and
- 4) following up on any identified non- compliance.

9. BOARD APPROVAL

This statement was approved by The Foundation's Board at its meeting on 27 May 2025.



Jane Madden, Chair

27 May 2025



The Fred Hollows
Foundation



www.hollows.org