# Grievance Mechanisms and Remediation

**September 2026**

Disclosure by ASX100 Financials and Materials Companies as Reported in the Modern Slavery Statements under the 8R Framework

**INSIDE**

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**Highlights**

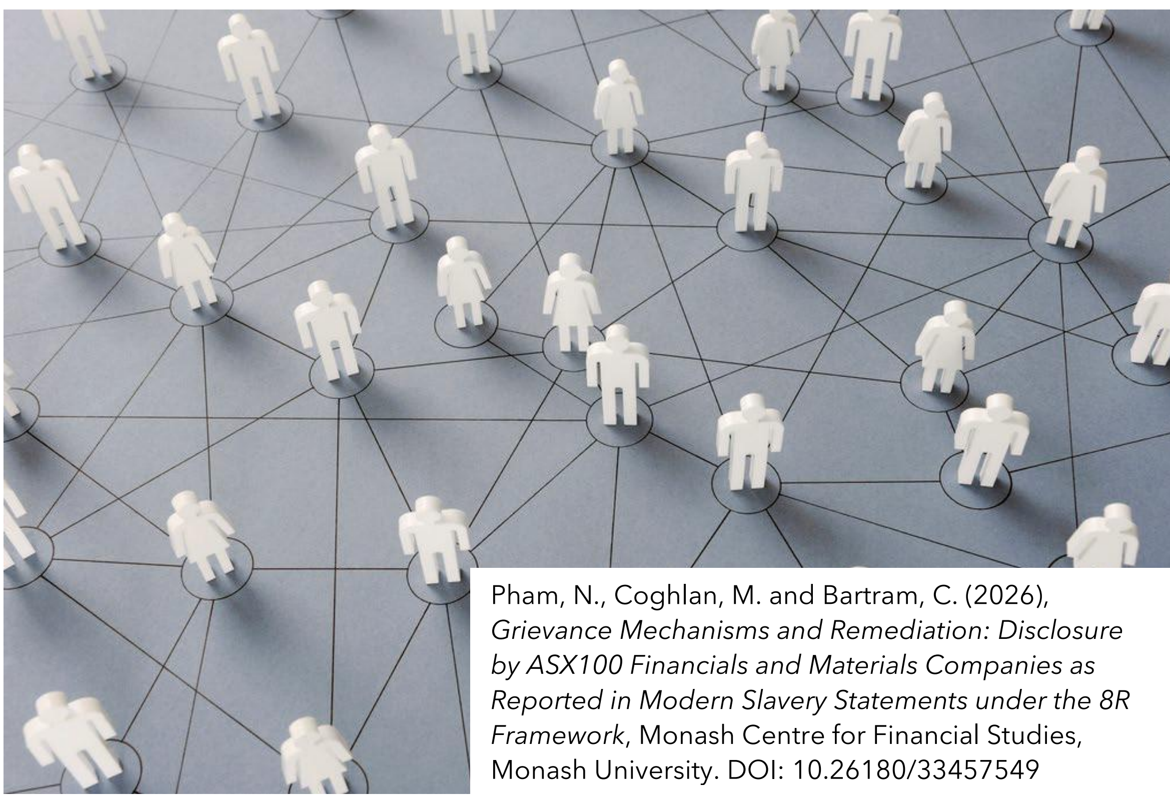
Grievance mechanism and remediation disclosures in modern slavery statements remain limited.

**New framework**

The 8R Framework introduced in this report offers a structured basis for disclosure and practice.

**Recommendations**

More specific disclosure expectations and regulatory guidance are needed if modern slavery statements are to become a more useful accountability mechanism for grievance systems and remediation.



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# Executive summary


This report examines the information disclosed about grievance mechanisms and remediation in the FY2024 modern slavery statements of 39 largest ASX100 Financials and Materials companies. It introduces the original 8R framework, a 40-question rubric anchored in the effectiveness criteria of the United Nations Guiding Principles on Business and Human Rights (UNGPs). The framework is organised around eight pillars – *Representation, Respect, Relationships, Receipt, Response, Remedy, Review and Reporting*.

The assessment is disclosure-based. It evaluates what companies report in their modern slavery statements. It does not verify the existence, quality or effectiveness of the underlying grievance and remediation practices.

As the Government considers mandatory disclosure requirements on grievance mechanisms and remediation in modern slavery statements, this report provides a timely, policy-relevant empirical survey of how far reporting entities currently disclose such information in their statements.

**Key findings:**

- Across the 39 companies reviewed, disclosure remains limited, with an average score of 14.28 out of 40, or 36 per cent of the 8R questions.
- Only five companies scored 20 or more, while most clustered in a long mid-tier and nine scored below 10, indicating that grievance and remediation disclosure in modern slavery statements is still underdeveloped across both sectors.
- Materials companies disclosed substantially more than Financials companies, averaging 17 compared with 11 points out of 40.
- The strongest area in both sectors is *Respect*, where many companies mention the scope, confidentiality and anti-retaliation protections.
- The weakest areas are *Remedy*, *Relationships* and parts of *Reporting.* The findings suggest that clearer expectations are needed on what entities should disclose about grievance design, remedy, review and outcome reporting if modern slavery statements are to serve as a meaningful accountability mechanism.


## Acknowledgments


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We also acknowledge the contributions from the Civil Society Organisations (CSOs), including the Human Rights Law Centre, the Red Cross, Anti-Slavery Australia, International Justice Mission, Electronics Watch, Migrant Justice, and the Salvation Army. The comments from the CSO Roundtable shed light on the practical barriers workers and survivors face when using company-level mechanisms.

We appreciate the support from the Monash Centre for Financial Studies (MCFS) Modern Slavery Research Program and the MCFS research assistants for data collection.

# Introduction

Large companies increasingly face heightened expectations to manage not only business risks, but also social risks embedded across their operations and global supply chains. Central to these expectations is the concept of a company's social licence to operate, the ongoing acceptance and trust granted by workers, communities, investors and society at large. Maintaining this licence requires companies to identify, manage and remediate adverse social impacts, including human rights violations and modern slavery practices, in a credible and transparent manner.

Businesses must establish channels through which potentially affected stakeholders can raise concerns, be heard, and seek redress. Workers, communities, and other rights-holders are often best placed to identify harms as they arise. Without accessible, trusted stakeholder mechanisms, companies risk remaining unaware of serious issues or responding too late, allowing grievances to escalate into systemic problems that can undermine trust, reputation, and long-term value.

Grievance mechanisms are formal or informal processes through which individuals or groups can raise concerns about adverse impacts and seek resolution. Grievance mechanisms function as early warning systems for companies as well as pathways to remedy for affected stakeholders.

Many large companies have extensive global operations and complex international supply chains and, as a result, have the potential to exert significant influence on labour practices worldwide. With this influence comes heightened responsibility. These companies are increasingly expected by investors, regulators and civil society to commit to providing working environments that are free from exploitation, human rights violations and modern slavery.

Under Australia's Modern Slavery Act (MSA), having effective grievance mechanisms and remediation processes is among the key actions that reporting entities need to take to address modern slavery risks in their operations and supply chains. The 2025-2026 government consultation on strengthening the MSA sought public views on further requirements and guidance for disclosing grievance mechanisms and remediation in the modern slavery statements. Transparent disclosure about how grievances are received, managed and resolved is essential to understanding whether companies' systems are credible, accessible, and trusted by those they are intended to protect.

This report is based on a collaborative research project between Monash University and the University of Sydney that examined information on grievance mechanisms and remediation disclosed in the FY2024 modern slavery statements of the largest Materials and Financials companies listed on the Australian Securities Exchange (ASX). It is intended for practitioners, regulators, investors and civil society organisations seeking to improve corporate grievance and remediation disclosure.

The project aims to develop a structured framework grounded in international standards and stakeholder perspectives, and to apply that framework to understand companies' current practices in disclosing information on human rights and modern slavery grievance mechanisms and remediation in their modern slavery statements.

Framework development combined a review of international laws and regulations, standards, guidance, best-practice notes and academic literature with consultations with responsible investment practitioners and CSOs to develop an understanding of good practices in grievance mechanisms and remediation disclosures.

The study focuses on modern slavery statements because they provide a common statutory disclosure document publicly available across the sample. As companies may publish additional information elsewhere, limiting the source boundary to the statement improves comparability but may understate broader public disclosure of current practice.

To provide an empirical observation, this report examines to what extent FY2024 modern slavery statements provide information that enables readers to assess grievance mechanisms and remediation against the effectiveness criteria of the UNGPs, as detailed in the 8R Framework. The review focuses on mechanisms related to human rights and modern slavery risks. The relevant question is not merely whether a channel exists, but whether the reported features are consistent with legitimacy, accessibility, predictability, equity, transparency, rights-compatibility, continuous learning, engagement and dialogue.

To demonstrate its practical application, the report includes an illustrative case study of the University of Sydney's grievance mechanism and its modern slavery statement, assessed against the 8R Framework.

The findings show that information on grievance mechanisms and remediation in modern slavery statements remains limited in both sectors, suggesting that the government would need to provide further guidance if it is to mandate detailed disclosure of grievance mechanisms and remediation.

# What is a Grievance Mechanism?

A grievance is a complaint or an expression of dissatisfaction raised by an individual or a group within communities about a real or perceived impact of a company's operations. According to the UNGPs, a grievance is "a perceived injustice evoking an individual's or a group's sense of entitlement, which may be based on law, contract, explicit or implicit promises, customary practice, or general notions of fairness of aggrieved communities". The term grievance mechanism refers to any "routinised, State-based or non-State-based, judicial or non-judicial process through which grievances concerning business-related human rights abuse can be raised and remedy can be sought" (Principle 25, page 27).

Grievance mechanisms are accessible directly to individuals and communities who may be adversely impacted by a business enterprise, including direct employees, contractors and subcontracted workers, supply chain workers, community members affected by a company's operations, trade unions and worker representatives, and other stakeholders acting on behalf of affected groups, such as civil society organisations.

Mechanisms are typically administered by organisations alone or in collaboration with other relevant stakeholders (UNGP 29).

In the context of human rights and modern slavery, grievance mechanisms provide a structured channel for workers, communities and other stakeholders to report actual or suspected harms, unsafe or unfair working conditions, exploitation, or other rights violations. Rather than relying on audits or third-party assessments, grievance mechanisms centre the experiences of rights-holders themselves.

Effective grievance mechanisms enable companies to listen to stakeholders, identify problems, and work collaboratively to address harms and prevent further injury to victims.

When well-designed and implemented, grievance mechanisms are an essential component of meaningful stakeholder engagement. They demonstrate a company's commitment to creating a fair and decent working environment, signal respect for worker welfare, and extend beyond a company's direct workforce to include workers throughout its supply chains. Having effective grievance mechanisms demonstrates how those commitments are operationalised in practice.

Conversely, ignored grievances or unanswered concerns can compound harm, erode trust, and transform manageable issues into significant legal, operational, and reputational risks.

The need for effective grievance mechanisms is particularly acute if the risk of modern slavery is high. Modern slavery risks frequently occur in complex, multi-tiered supply chains where visibility is limited, and power imbalances are significant. Supply chain workers, especially migrant and temporary workers, are often among the most critical users of grievance mechanisms, yet also the most vulnerable. Without accessible and trusted channels for raising concerns, workers may remain silent due to fear of retaliation, lack of awareness, language barriers, or distrust of company processes.

Effective grievance mechanisms help overcome these barriers by providing safe, confidential and culturally appropriate pathways to raise concerns and seek redress[1].

# Existing guidance and literature

The following international standards and guidelines have formed the foundation of the 8R Framework: the UNGPs (2011), the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct (2023), ILO Manual on Grievance Mechanisms (2023), and the reports from Global Compact Network Australia (2021 a & b) and other guidance from large development and financial institutions.

[1] For the purposes of this review, a company's whistleblower channel is treated as a grievance mechanism if it is mentioned in the modern slavery statement as such. Bank Track Organisation (2026) reports that an increasing number of banks have positioned whistleblowing channels as a possible avenue for raising human rights-related issues. While the two operate under different legal and normative regimes, a whistleblower program can be adapted to serve as a grievance mechanism, according to the guidance of the UN Global Compact Network Australia (UNGCNA, 2021b). The UNGCNA recommended key actions to modify whistleblowing hotlines to capture modern slavery grievances, including expanding the accessibility and scope of the whistleblower policy, ensuring whistleblower protections required under the Corporations Act, training for staff handling grievances, modifying the investigation process, and balancing transparency and whistleblowing confidentiality (UNGCNA, 2021b). In this review, we do not assess whether the company has made the necessary adaptations for the whistleblowing program to function fully and effectively as a grievance mechanism, acknowledging the limitations in treating them as equals.

The most prominent guidance for non-State-based grievance mechanisms is the United Nations Guiding Principles on Business and Human Rights (UNGPs) issued by the UN Office of the High Commissioner for Human Rights in 2011. Principle 29 requires companies to "establish or participate in effective operational-level grievance mechanisms for individuals and communities who may be adversely impacted" (Page 31). To ensure effective operation, these grievance mechanisms should meet the effectiveness criteria set out in Principle 31, including being legitimate, accessible, predictable, equitable, transparent, rights-compatible, a source of continuous learning, and – for operational-level mechanisms specifically – based on engagement and dialogue.

The goal is to identify adverse human rights impacts as a part of an enterprise's ongoing human rights due diligence. Once identified, these grievances will be addressed, and the adverse impacts will be remediated. Companies should also analyse complaint trends and patterns to identify and fix any systemic issues that may have caused grievances, thereby preventing harms from escalating.

The OECD Guidelines for Multinational Enterprises on Responsible Business Conduct (OECD Guidelines) (2023) cover all key areas of business responsibility, including human rights, labour rights, environment, bribery, consumer interests, disclosure, science and technology, competition, and taxation. The Guidelines require that governments establish "the National Contact Points (NCPs) for Responsible Business Conduct" and enterprises to "provide for or cooperate through legitimate processes in the remediation of human rights impacts where they identify that they have caused or contributed to those impacts" (Page 25). NCPs are an external pathway with which company mechanisms are expected to cooperate. The OECD Guidelines also recognises the core criteria of "legitimacy, accessibility, predictability, equitability, compatibility with the Guidelines, transparency, rights-compatibility, being a source of continuous learning, and are based on dialogue and engagement with a view to seeking agreed solutions" (Page 27).

Non-State-based grievance mechanisms also encompass project-based channels, with key guidance issued by the development and financial institutions such as the World Bank Group and its members. The International Finance Corporation (IFC)'s Good Practice Note (2009) on addressing grievances from project-affected communities provides guidance for projects and companies on designing grievance mechanisms, under the IFC Policy and Performance Standards framework. The guidance reflects the view that companies need to engage effectively with stakeholders by encouraging active participation and feedback from affected groups and that a mechanism to address affected communities' concerns is an important pillar of stakeholder engagement. While focusing on project-level grievance mechanisms in the private sector, IFC reminds businesses to engage with the formal justice system and other independent dispute resolution and accountability bodies to ensure that communities have the right to use alternative avenues for recourse. IFC models five principles and five process steps for a grievance mechanism: publicising, receiving and registering, reviewing and investigating, responding, and monitoring and evaluating.

On designing and implementing grievance mechanisms, the Office of the Compliance Advisor/Ombudsman[2] (CAO)'The Advisory Note (2008) describes the four phases: defining scope and goals; designing, implementing, and operating; and monitoring, reporting, and learning. Key advice includes involving the community in the design, ensuring accessibility, maintaining a wide scope of issues, developing culturally appropriate procedures, incorporating a variety of grievance

[2] The CAO (Office of the Compliance Advisor/Ombudsman) is an independent post that reports directly to the President of the World Bank Group. The CAO reviews complaints from communities affected by development projects undertaken by the private sector lending and Insurance members of the World Bank Group, the International Finance Corporation (IFC) and the Multilateral Investment Guarantee Agency (MIGA)

resolution approaches, maintaining and publicising multiple access points, reporting back to the community, and evaluating to improve the system. These two practical models of the IFC and CAO inform some questions in the Receipt, Response, Remedy, Review and Report pillars of the 8R framework.

Grievance mechanisms are also a key requirement under the Equator Principles, the voluntary guidelines that provide a framework for financial institutions to manage the environmental and social impacts of the projects they finance. Also based on the IFC Performance Standards, Equator Principle 6 requires that GMs be designed for use by Affected Communities and Workers and scaled to the project's risks, as part of the stakeholder engagement process. The Equator Principles provide further guidance to strengthen access to effective GMs and enable effective remedies[3] by developing a list of due diligence questions related to GMs' design, performance reporting and KPIs based on the UNGPs' effectiveness criteria.

In this review, we focus on the Financials and Materials ASX 100 companies, the two sectors with the largest number of companies listed on the ASX. Specifically in the finance sector, BankTrack's Human Rights Users Guide[4] supports rights-holders, representatives and civil society in raising human rights complaints with commercial banks and pursuing remedies. The guide notes that eight commercial banks globally have established or joined grievance mechanisms for people and communities affected by projects they finance, and discusses the role of bank mechanisms, whistleblowing channels, OECD NCPs, UN Special Procedures, independent accountability mechanisms, and industry-level mechanisms, thereby informing the Relationships pillar of the 8R Framework.

In the Materials sector, Walk Free (2022), together with the Human Rights Resource and Energy Collaborative (HRREC), produced a six-step framework for modern slavery response and remedy, substantially informing the process pillars of our 8R framework.

Despite a wide range of normative standards and guidance for grievance mechanisms, the Office of the High Commissioner for Human Rights (OHCHR) (2024), under the Accountability and Remedy Project (ARP)[5], observes significant gaps between the principles and practice. The OHCHR reports that few non-State-based grievance mechanisms fulfil their role due to limited accessibility to these mechanisms and a lack of adequate remedies. Despite a notable increase in companies having operational-level grievance mechanisms in response to private and public expectations as directed by the UNGPs, these mechanisms tend to be ineffective due to a lack of government regulation or oversight (Laplante, 2023). The author emphasises that governments can be liable for failing to protect human rights violated by private actors and to ensure effective access to remedies, therefore calling for more robust state regulation and oversight to ensure accountability of private mechanisms. The author also criticises the UNGPs for their ambiguities and for the inadequate guidance on their implementation provided by UN bodies.  As a result, there is no clear government regulation to monitor and enforce that corporate GMs handling human rights claims are effective, transparent and fair. Companies have full discretion in determining the designs, operations, and outcomes of these company-level GMs and remedies, often with little transparency (Laplante, 2023).

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[3] The Equator Principles. (2022). Tools to Enhance Access to Effective Grievance Mechanisms and Enable Effective Remedy. https://equator-principles.com/app/uploads/Tools-Access-to-remedy_FINAL.pdf
[4] Bank Track (2026). Bank Human Rights Complaints Channels: A Users' Guide. https://www.banktrack.org/campaign/hrusersguide
[5] Accountability and Remedy Project (ARP) I: Judicial mechanisms; ARP II: State-based non-judicial grievance mechanisms; ARP III: Non-State-based grievance mechanisms.

The Corporate Human Rights Benchmark (CHRB)[6] report notes that during the five years of benchmarking from 2018 to 2023, while the accessibility of GMs has improved for supply chain workers and other external individuals and communities, their effectiveness remains low.

The effectiveness and transparency level of corporate GMs remain underexplored in both industry and academic literature. Little empirical work has examined how companies design, operate and evaluate GMs. Existing industry benchmarking reports tend to treat GMs as a secondary issue rather than the focus. For example, the CHRB's report[7] assesses only four indicators related to grievance mechanisms out of the 23 questions in its annual benchmarking reports. The KnowtheChain food and beverage benchmark 2026[8] included only three indicators related to GMs among 35 questions. Across the seven pillars it assessed, Remedy has the lowest average theme scores in all regions. This gap suggests that current frameworks lack the granularity needed to assess whether corporate mechanisms meet the UNGP effectiveness criteria. The 8R Framework contributes a granular focus on architecture, process, remedy, learning, and disclosure, while acknowledging a clear distinction between disclosed information and verified practice. This study aims to establish empirical evidence to advance transparency in corporate grievance mechanisms and remediation.

# Framework development

There is a clear imperative for Australian companies to adopt effective grievance mechanisms and remediation. Based on domestic and international standards, existing literature, investor expectations and civil society guidance, the project team developed the 8R framework as a structured, theoretically grounded tool to guide companies, investors, regulators and civil society in evaluating effective GM disclosure and identifying gaps.

The theoretical foundation of the newly developed 8R framework is anchored in internationally recognised human rights standards and guidelines, notably the UNGPs, the OECD Guidelines, the reporting requirements outlined in the Australian Modern Slavery Act, and the victim-centred reporting protocols emphasised by the NSW Anti-slavery Commissioner.

The framework integrates core principles derived from these standards, including legitimacy, accessibility, predictability, equitability, transparency, rights-compatibility, and continuous improvement through stakeholder dialogue, into a structured approach encompassing eight interrelated pillars: **Representation, Respect, Relationship, Receiving grievances, Response, Remedy, Review, and Reporting**. Together, these pillars represent a baseline set of considerations and good practices for designing, implementing, evaluating the effectiveness of and reporting on grievance mechanisms and remediation.

The framework was refined by two rounds of consultations with investors and CSOs, with roundtable discussions organised by the University of Sydney, to incorporate rights-holder

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[6] World Benchmarking Alliance. (2024). *The State of Play on Business and Human Rights: Trends and Insights from Five Iterations of the Corporate Human Rights Benchmark (2018 – 2023)*. https://assets.worldbenchmarkingalliance.org/app/uploads/2024/11/CHRB-5X-Report-1.pdf
[7] See the 2026 CHRB Methodology: https://www.worldbenchmarkingalliance.org/sites/default/files/2026-02/CHRB_limited_application-%20FINAL.pdf
[8] KnowTheChain. (2026). 2026 *Food and Beverage Benchmark Report*. https://www.business-humanrights.org/en/from-us/briefings/2026-knowthechain-food-and-beverage-benchmark/

perspectives and investor expectations for an effective human rights program. Feedback was integrated into the final framework and scoring questions.

Using the 8R Framework, we assess the extent to which companies disclose evidence of:

- the existence of grievance mechanisms and remediation processes;
- accessible and well-communicated channels for raising concerns;
- monitoring and oversight of these channels; protections for privacy and against retaliation;
- additional safeguards designed to enhance stakeholder confidence; and
- reported information relevant to awareness, trust, use and functioning of these mechanisms.

While companies may promote information through many sources, such as online communications, annual reports (including sustainability reports), and other publicly available channels, this report focuses only on what companies disclose in their modern slavery statements. A YES records explicit disclosure within that boundary. A NO means that we do not find sufficient evidence within the statement. A NO does not establish that the underlying practice is absent.

***Responsible investment practitioners***

Comments on the draft indicators were sought from four responsible investment experts in Melbourne and Sydney investment communities in April and May 2025. The experts noted the importance of tracking data on worker views and company cases when developing indicators, including worker awareness and trust in grievance mechanisms, as well as transparency about the number of grievances received and resolved by companies. They also considered the existence of different types of grievance mechanisms which can help to provide sufficient access – whistleblower mechanisms, company hotlines, etc.- and the role of company collaboration in promoting grievance mechanisms within industries/supply chains and with other stakeholders such as NGOs and unions to be worth considering in assessing the broader company ecosystem of modern slavery remediation.

## *Civil Society Organisations*

The consultation roundtable with CSOs was organised by the Modern Slavery Unit at the University of Sydney in June 2025, bringing together the Human Rights Law Centre, Red Cross, Anti-Slavery Australia, International Justice Mission, Electronics Watch, Migrant Justice, and the Salvation Army, all of whom have deep experience working with people with lived experience of modern slavery. Participants were given the 8R framework questions and invited to suggest refinements, followed by an open discussion of their experience in supporting survivors or other complainants through grievance processes.

CSO participants highlighted that effective mechanisms should be free to access, address concerns promptly, be culturally appropriate, protect against retaliation, and not restrict or delay access to judicial or administrative remedies. They stressed the importance of active engagement with stakeholders, particularly those potentially affected, ensuring their involvement in design and operation to build legitimacy and trust. Crucially, companies should invest in understanding whether the grievance mechanisms put in place are genuinely known, accessible and trusted by workers and other stakeholders in practice.

In reviewing the 8R framework, the CSOs emphasised the need for companies to support complainants, including, but not limited to, financial, legal and psychological assistance, to reduce the power imbalance between the organisations and individuals in the process. Participants also underlined the importance of positioning the company-level GMs in a broader ecosystem of industry or multi-stakeholder initiatives and state-based mechanisms, as well as identifying appropriate pathways for referring cases to relevant authorities.

Reflecting insights from the CSO roundtable, the 8R framework places strong emphasis on confidence, trust, support, transparency, and accountability in grievance and remediation procedures and outcomes.

## The UNGPs' effectiveness criteria

Using information available in modern slavery statements, this study assesses whether statements disclose information regarding how large Australian companies address the UNGP 31 effectiveness criteria. Each question in the 8R framework maps to at least one effectiveness criterion.

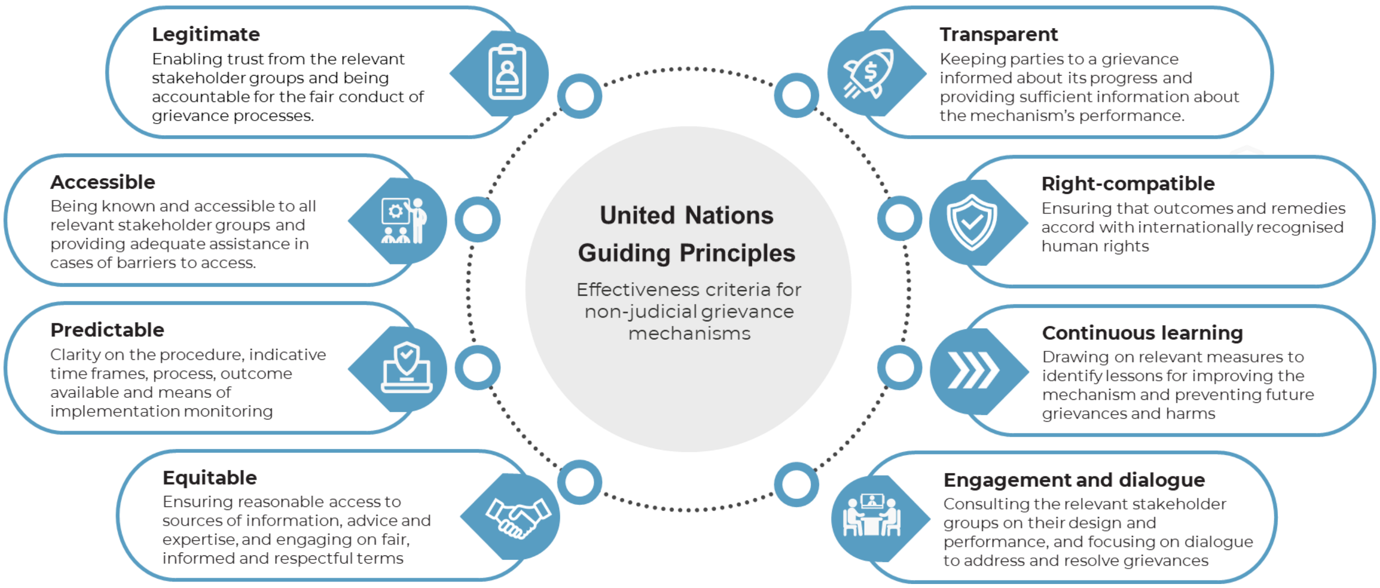


*Figure 1: UNGPs ' effectiveness criteria for grievance mechanisms*

According to the UNGP 31, in order to ensure their effectiveness, non-judicial grievance mechanisms should be:

*(a) Legitimate*: enabling trust from the stakeholder groups for whose use they are intended, and being accountable for the fair conduct of grievance processes;

*(b) Accessible*: being known to all stakeholder groups for whose use they are intended, and providing adequate assistance for those who may face particular barriers to access;

*(c) Predictable*: providing a clear and known procedure with an indicative time frame for each stage, and clarity on the types of process and outcome available and means of monitoring implementation;

*(d) Equitable*: seeking to ensure that aggrieved parties have reasonable access to sources of information, advice and expertise necessary to engage in a grievance process on fair, informed and respectful terms;

*(e) Transparent*: keeping parties to a grievance informed about its progress, and providing sufficient information about the mechanism's performance to build confidence in its effectiveness and meet any public interest at stake;

*(f) Rights-compatible*: ensuring that outcomes and remedies accord with internationally recognized human rights;

*(g) A source of continuous learning*: drawing on relevant measures to identify lessons for improving the mechanism and preventing future grievances and harms;

*(h) Based on engagement and dialogue*: consulting the stakeholder groups for whose use they are intended on their design and performance, and focusing on dialogue as the means to address and resolve grievances.

## The 8R Framework for Grievance Mechanism and Remediation

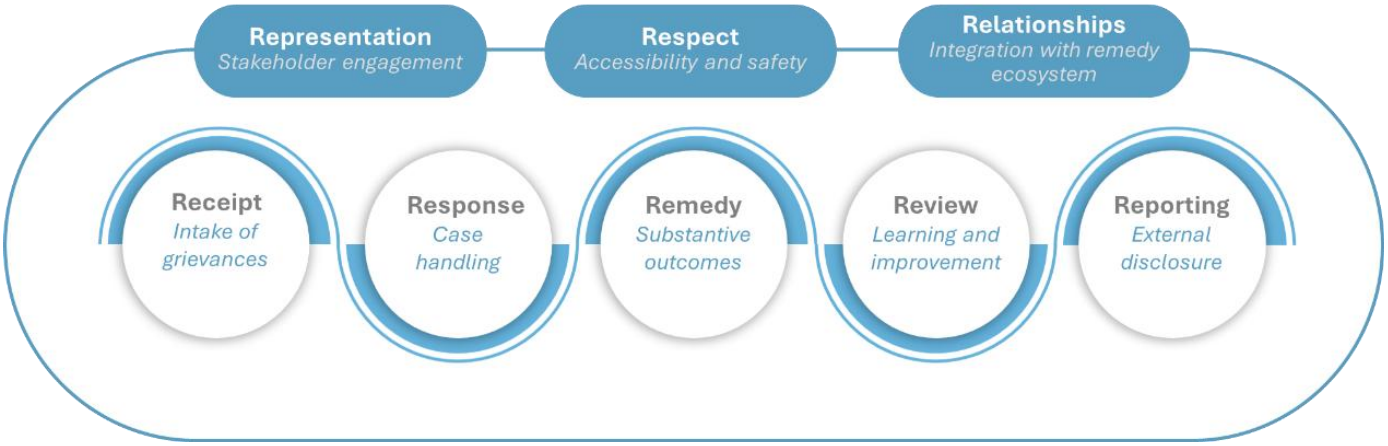


*Figure 2: Pillars of the 8R Framework*

The 8R framework comprises three overarching criteria – ***Representation***, ***Respect*** and ***Relationships*** – which form the foundational pillars underpinning its effectiveness.

- ***Representation*** – *Stakeholder engagement in design* emphasises active engagement and dialogue with stakeholders, ensuring grievance mechanisms are designed and operated collaboratively with those who may be impacted.
- ***Respect*** – *Accessibility and safety* underscore the necessity for equitable, confidential, and accessible processes, enabling stakeholders to participate safely and meaningfully.
- ***Relationships*** – *Integration with the remedy ecosystem* is about how the grievance mechanisms interact with external mechanisms.

Building upon these three foundational pillars, the framework outlines five lifecycle pillars:

- ***Receipt*** – *Intake of grievances* is about how accessible channels are established for stakeholders to voice concerns.
- ***Response*** – *Case handling* ensures transparent, timely, and accountable handling of grievances.
- ***Remedy*** – *Substantive outcomes* provides appropriate and satisfactory solutions to address harm.
- ***Review*** – *Learning and improvement* is about continuously improving the grievance mechanism through regular analysis and stakeholder feedback.
- ***Reporting*** – *External disclosure* involves transparent communication about grievance outcomes and processes.

Forty scoring questions sit beneath the eight pillars. Each question is guided by the effectiveness criteria of UNGP 31 and relevant guidance from the World Bank, IFC, UNGCNA, the Equator Principles, and the academic literature. The full mapping is provided in the Appendix.

Together, these 8Rs provide a structured rubric for disclosure assessment and evidence-based internal review, a useful reference framework for practitioners and policymakers. The case study of the University of Sydney at the end of the report illustrates how an organisation can adopt the framework for its internal review of disclosure and practice.

# 8R pillars and questions

R1

**Representation:** *Stakeholder engagement in design*

*Representation*, *Respect*, and *Relationships* are the foundational pillars of the 8R framework, as they relate to the overarching design and development of the GMs.

*Representation* addresses the legitimacy criterion under UNGP 31(a) and the rights-compatibility criterion under UNGP 31(f), by questioning whether GMs are grounded in internationally recognised standards.

*Representation* captures the requirements that GMs be designed and operated in dialogue with the stakeholders they are intended to serve. GMs are designed to ensure that stakeholders' best interests are considered. This pillar derives from the UNGP 31(h), which requires operational-level mechanisms to be based on engagement and dialogue with stakeholders. Other international guidance and frameworks have highlighted the importance of engagement and dialogue (The Equator Principles, 2022; NGCNA, 2021; IPIECA, 2012). While some aspects of GM design should be internal considerations, stakeholder perspectives are essential for improving the accessibility, remedies, trust, and transparency of the mechanisms (Rees, 2011). Harrison and Wielga (2023) empirically support this rationale, arguing that a GM has input legitimacy depending on who is represented in the mechanism; otherwise, a GM can reinforce the power of dominant stakeholders and marginalise less powerful workers in supply chains and potentially affected communities.

There are two questions in the *Representation* pillar.

Q1.1 Does the company explicitly reference international human rights standards (e.g., UNGPs, OECD Guidelines, ILO Conventions, or other equivalent international human rights frameworks) as the normative basis for its grievance mechanism design?

Q1.2 Does the company consult affected stakeholders or their legitimate representatives in grievance mechanism design?

R2

**Respect:** *Accessibility and safety*

*Respect* underpins the requirements of rights-compatible, equitable, accessible, confidential and culturally appropriate mechanisms, drawing on the UNGP 31 (b)(c) (d) and (f). The questions in this pillar examine whether companies' GMs explicitly cover all human rights issues, guarantee confidentiality and protection against retaliation and whether considerations have been given to removing barriers related to language, literacy, fear of reprisal and trauma in the design and operation of the GMs.

Other works that inform the questions in this pillar include Anti-Slavery International (2021), IFC Performance Standard 1 and Good Practice Note (2009), Australian Government Modern Slavery Guidance (2025) and the Equator Principles (2022). Anti-Slavery International (2021) documents that migrant workers are systematically excluded from corporate mechanisms due to language, retaliation fear, and lack of confidentiality – findings that reinforce the necessity of treating respect as a distinct framework pillar.

There are five questions in the *Respect* pillar.

Q2.1 Does the mechanism accept grievances across all human rights issues, or is it limited to only modern slavery?

Q2.2 Is the company's grievance mechanism available in multiple languages of potentially affected stakeholders?

Q2.3 Does the company's grievance mechanism ensure confidentiality?

Q2.4 Does the mechanism include explicit anti-retaliation protections to avoid reprisal?

Q2.5 Does the company incorporate trauma-informed principles in the design and operation of its grievance mechanism?

## R3 **Relationships:** *Integration with the remedy ecosystem*

The *Relationships* pillar captures how a company's GMs connect with the wider remedy ecosystems, including judicial mechanisms, state-based non-judicial bodies such as the OECD NCPs, labout authorities, support services, industry-based multistakeholder initiatives (MSIs) and collaborative initiatives managed by non-governmental organisations (NGOs) (UNGCNA, 2021). It is grounded in the UNGPs 25 and 29 – 31, which view company-level mechanisms as part of a wider remedy ecosystem that complements judicial remedies. The OECD Guidelines (2023) specifies the role of the NCPs when company mechanisms fail. IFC Performance Standard 1 requires that the company's mechanism not impede access to other judicial and administrative remedies or substitute for those provided through collective agreements (IFC, 2012). As such, a mechanism's effectiveness depends in part on its interoperability with external authorities.

Supply chain GMs are included in this pillar. The Modern Slavery and Human Rights Policy Evidence Centre (PEC)(2022), the UNGCNA (2021), IFC Performance Standard 2 (IFC, 2012) all emphasise the importance of supply chain mechanisms. Ideally, at the aspirational level, a company should (a) require suppliers to have grievance mechanisms, (b) verify their existence, (c) provide guidance or capacity support, and (d) extend its own mechanism to supply chain workers where supplier mechanisms are absent. Indeed, the Fashion Revolution's Fashion Transparency Index noted an increase in the number of companies requiring grievance mechanisms in their supply chains[9].

The pillar addresses the UNGP 31 (f) Rights-compatible criterion in that referral protocols must not restrict victims' access to judicial or state-based remedies, and 31(a) Legitimate, as reliance on independent external bodies enhances trust in the mechanism.

[9] Fashion Revolution, Fashion Transparency Index: 2021 Edition 72 (2021), https://issuu.com/fashionrevolution/docs/fashiontransparencyindex_2021

There are five questions in the *Relationships* pillar.

Q3.1 Does the mechanism have documented referral protocols to law enforcement, labour authorities, and support services for cases involving suspected criminal conduct or serious harm?

Q3.2 If the company reports a grievance to police, do they notify and consult with the complainant or their legitimate representatives?

Q3.3 Does the company belong to collaborative grievance mechanisms if available, e.g., industry, multistakeholder?

Q3.4 Does the company explicitly commit to cooperating in other grievance mechanisms, e.g., courts, tribunals, OECD NCPs, and UN Special Procedures?

Q3.5 Does the company require its suppliers to have grievance mechanisms?

R4

## **Receipt:** *Intake of grievances*

R4 – 8 Pillars address the effectiveness of the company's process in receiving, responding, remediating grievances, as well as reviewing and reporting on the mechanism performance. Questions under these pillars are informed by the IFC's guidance for projects and companies on designing grievance mechanisms (IFC, 2009), the ILO's grievance procedure in its *Manual on Grievance Mechanisms* (2023), Walk Free and the Human Rights Resources & Energy Collaborative (HRREC)'s response and remediation framework (Walk Free, 2022).

The *Receipt* Pillar concerns the intake of grievances from the company's perspective and the submission of grievances from the complainant's perspective. This process step requires companies to establish accessible channels through which stakeholders can submit concerns and their submission be promptly acknowledged. Proactive communication about these channels is critical to ensure that they are known, trusted and used by the intended users, as accessibility does not necessarily guarantee utilisation. Whether workers and other stakeholders actually use the provided GMs depends much on their confidence and trust in the channel.

Questions in this pillar cover accessibility, as a pre-submission channel-awareness item, the availability of multiple channels, and the support provided to complainants during the process, all addressing UNGP 31(b) – accessible and 31(d) – equitable.

There are five questions in the *Receipt* pillar.

Q4.1 Does the company proactively communicate the grievance mechanism and complaint process in ways that are accessible to affected stakeholders?

Q4.2 Does the company provide multiple channels for reporting a grievance, e.g., in-person, phone, online, third-party operated hotlines or through different business functions?

Q4.3 Does the company support affected stakeholders submitting grievances so they can participate in the grievance process in a fair and informed way, e.g., technical, financial, legal, linguistic, and psychosocial support?

Q4.4 Does the mechanism explicitly permit submission by legitimate representatives (including trade unions, worker representatives, civil society organisations, and legal counsel) acting on behalf of complainants?

Q4.5 Does the company timely acknowledge receipt of grievances?

R5

## **Response:** *Case handling*

The *Response* pillar encompasses transparent, timely and accountable handling of grievances once received. It is anchored in UNGP 31 (a) – legitimate, the process being handled by qualified personnel and trusted by stakeholder groups, 31(c) – predictable, which requires a clear, known procedure with an indicative time frame for each stage, 31(d) equitable, because proper attribution determines the level of remedy obligation, 31(e) – transparent and 31(f) – rights-compatible, regarding the types of outcomes available, and 31(h) – engagement and dialogue during the process.

IFC Performance Standard 1 (IFC, 2012) requires the use of an effective grievance mechanism in which grievances are responded to promptly and managed appropriately, through an understandable and transparent process that provides timely feedback to those concerned. Hence, the questions under this pillar concern the transparency and predictability of the triage and case assessment step that occurs after grievance intake, the roles and responsibilities of relevant functions and units in handling grievances, and communication with complainants throughout the process. The assessment of the submitted grievance should align with UNGPs 13, 17, and 19 on the cause/ contribute/ linked framework.  Companies should also ensure that personnel are trained in trauma-informed practice, human rights standards, cultural competency, confidentiality, and other obligations (OHCHR, 2021).

There are six questions in the *Response* pillar.

Q5.1 Does the mechanism publish clear, indicative timeframes for each stage, the range of possible outcomes, and how outcomes will be communicated?

Q5.2 Does the company assess whether it potentially caused, contributed to or is directly linked to the grievance in line with the UNGPs?

Q5.3 Does the company engage in structured dialogue with complainants and/or their legitimate representatives during the grievance process?

Q5.4 If the company and the complainant cannot agree on a resolution, can the grievance be escalated to independent third-party mediation at no cost to the complainant?

Q5.5 Does the company provide training to staff responsible for handling grievances and supporting complainants?

Q5.6 Do the relevant company functions participate in handling grievances, e.g., human resources, human rights, procurement, legal, finance, sustainability/ESG, operations?

R6

**Remedy:** *Substantive outcomes*

The *Remedy* pillar examines the provision of appropriate and satisfactory solutions and outcomes to address harm. It is derived from UNGP 25 on the responsibilities of states and businesses in ensuring access to effective remedy. Walk Free (2022: 5) defines remedy for human rights harm as "both the processes of providing remedy for an adverse human rights impact and the substantive outcomes that can counteract, or make good, the impact". The OHCHR (2024) provides further guidance on access to remedy in cases of business-related human rights abuse via non-state-based grievance mechanisms. It sets out the full remedy spectrum, including restitution, rehabilitation, compensation, satisfaction and guarantees of non-repetition. Companies should identify if complainants are satisfied with the outcome. According to the CHRB Report 2020, only 4% of the 225 allegations reviewed found that companies provided a remedy that victims considered satisfactory. Harrison & Wielga (2023) warn that corporate mechanisms may marginalise the more fundamental question of what outcomes are actually achieved for rights-holders.

Where the company is directly linked to a grievance (but did not cause or contribute to it), it should seek to use and build its leverage – including through collaboration with other buyers, investors, or civil society – to influence the responsible party to provide remedy (Walk Free; 2022), aligning with UNGP 13, 17 and 19 on leveraging power to influence outcomes.

The questions in this pillar address UNGP 31 criteria (f) rights-compatible and 31(d) equitable – remedies must be consistent with internationally recognised human rights standards, and 31(g) Continuous learning. Consultation with complainants requires systematically seeking and documenting feedback to ensure that remedies are proportionate to the severity of harm.

There are three questions in the *Remedy* pillar.

Q6.1 Does the company's grievance mechanism have the capacity to provide a full range of remedies, including restitution, compensation, rehabilitation, satisfaction, guarantees of non-repetition, and referral to external legal or psychosocial services?

Q6.2 Does the company consult complainants or their legitimate representatives on the satisfactoriness and adequacy of remedies provided?

Q6.3 Where the company is directly linked to a grievance (rather than causing or contributing to it), does it seek to use and build its leverage – including through collaboration with other buyers, investors, or civil society – to influence the responsible party to provide remedy?

## R7 **Review:** *Learning and improvement*

The *Review* pillar of the 8R framework captures UNGP 31(g), which requires mechanisms to be a source of continuous learning. Companies need to conduct regular, systematic analysis of GM performance, identify root causes of issues through grievance data, and draw lessons. The review should be planned with known frequency, methodology, and indicators, and require inputs from stakeholders. This pillar also reflects the continuous improvement requirement under Australia's Modern Slavery Act (2018).

Considerations should be given to the level of independence of such review – an important legitimacy safeguard, related to UNGP 31 criterion (a) Legitimate, as independent review enhances institutional legitimacy. There should be management oversight and accountability over the operation of GMs, as designated executive accountability enhances the legitimacy of the mechanisms.

Other works that inform the questions in this pillar include Harrison & Wielga (2023) on external review in MSIs, Equator Principles (2022), OHCHR (2021), and IPIECA (2012).

There are six questions in the *Review* pillar.

Q7.1 Does the company periodically and systematically review the effectiveness of its grievance mechanism, i.e., its design and operation, against defined key performance indicators (e.g., awareness, uptake rate, trust, resolution rate, complainant satisfaction, time from receipt to the completion of remedied grievances)?

Q7.2 Does the company consult complainants/ affected stakeholders to review the effectiveness, including whether they know and trust the grievance mechanism?

Q7.3 Does the company involve independent third parties (e.g., external auditors, civil society organisations, academic researchers) in reviewing the effectiveness of its grievance mechanism?

Q7.4 Does the company conduct root-cause analysis of systemic issues identified through grievance data?

Q7.5 Are findings from effectiveness reviews documented and translated into specific changes to mechanism design or operation?

Q7.6 Does senior management oversee and is accountable for the grievance mechanism?

## R8 Reporting: *External disclosure*

The *Reporting* pillar assesses the level of transparency in external communication about grievance processes, categories, outcomes and resolution time. It is grounded in UNGP 31(e) – transparency and Australia's Modern Slavery Act 2018, which mandates the disclosure of due diligence and remediation processes and actions. The annual benchmarking report on the modern slavery disclosure quality of ASX100 companies by Pham et al. (2025) notes that remediation and effectiveness reporting remain the weakest areas.

Companies should reflect and report on cases, on an anonymised basis, as case examples build stakeholder confidence – enhancing the legitimacy of GMs.

Companies are increasingly disclosing the number of grievances received and handled in their modern slavery statements. The Fashion Transparency Index (2021) reports that one out of four brands started to disclose data about the number of reported violations or grievances.

The questions in this pillar also address UNGP 31 criterion (g) Continuous learning.

There are eight questions in the *Reporting* pillar.

Q8.1 Does the company report the total number of grievances received through its mechanisms in the reporting period?

Q8.2 Of those, does the company report the number relating to modern slavery or other human rights issues?

Q8.3 Does the company report the grievances it caused or contributed to?

Q8.4 Does the company disclose remediation outcomes and the proportion of grievances resolved to the complainant's satisfaction?

Q8.5 Does the company publicly report the average or median time taken to complete remedied grievances?

Q8.6 Does the company disclose anonymised case examples of grievances received or remedied?

Q8.7 Does the company have a formal process for reporting grievance mechanism performance to the board or a relevant board committee on a regular basis?

Q8.8 Does the company adopt any internationally recognised reporting standards/ frameworks for reporting grievances and remediation?

# Data and methodology

This study is a descriptive content analysis focusing on the disclosure of GMs in modern slavery statements. Only information in the statement is scored.

There is no uniform practice for where grievance processes "sit" in a company's governance structure or how they are reported externally. Some companies rely on whistleblowing systems; others on ethics hotlines or stakeholder feedback channels, making it hard to compare practices across multiple company policies and reports. In practice, modern slavery statements are often among the most accessible places where companies consolidate information on how concerns are raised and addressed.

Furthermore, there is a growing expectation that modern slavery statements disclose GMs, the number and nature of grievances, and outcomes. Reviewing GMs and remediation disclosures through these statements therefore offers a more comparable lens on how companies design, use, and report such processes.

## Sample and scores

This study covers 39 FY2024 modern slavery statements in the S&P/ASX100 Index, as of the end of the reporting period, including 20 Financials and 19 Materials companies[10]. These sectors were selected as two of the largest ASX100 cohorts. This provides a comparison between a financial services sector and a physically intensive sector with concentrated operational and supply chain risks. Sector comparisons are descriptive only, as no claim of statistical significance or causal explanation is made.

Each statement was assessed against the 8R framework. A YES receives one point when the statement contains explicitly information sufficient to address the question. A NO receives Zero point if no/insufficient evidence is present. All questions are equally weighted.

Disclosure scores (points) represent counts of disclosed items, reported as pillar and total scores. Disclosure rates (%) are calculated as the proportion of statements receiving a YES for each question.

## Analytical approach and limitations

The assessment is based on disclosed information and does not verify whether reported processes exist and operate as described. Company scores are disclosure scores, not an assessment of operational effectiveness. This distinction matters for both interpretation and implementation of the framework.

Therefore, the findings of this study should be understood as an assessment of how GMs and remediation are disclosed in modern slavery statements. A direct evaluation of the effectiveness of the underlying company practices would require a study involving all internal policies, websites, supplier portals, whistleblowing frameworks or other channels, as well as inputs from relevant stakeholders.

We recognise the limitations of the current study as it risks underestimating practice in which mechanisms are well developed but only briefly referenced in the modern slavery statement. Additional limitations include the single reporting period, potential lag between practice and reporting, binary scoring that cannot capture all differences in disclosures, and equal weighting of indicators with different practical significance, providing opportunities for future research to validate the 8R framework across different contexts and assess how GMs operate in practice.

[10] The sectoral classification is based on the Global Industry Classification Standard (GICS) collected via Bloomberg.

# Findings

Overall, GM and remediation information provided in the modern slavery statements across the sample is limited, with an average score of only 14.28 out of 40 points, indicating that disclosures cover approximately 36% of the 40 scoring questions. Only five companies provide information on at least 20 of the 40 questions in the framework, while nine score below 10. While most scores range from 10 to 18 in the long mid-tier group, the distribution shows substantial variation, from between 33 and 2 out of 40. Eight of the top 10 companies are Materials, whereas eight of the lowest 10 are Financials.

Figure 3 presents company-level disclosure scores, with the highest observed score of 33 and the lowest at 2/40. The smaller tail of very low scorers indicates that some companies provide almost no meaningful disclosure on grievance and remediation processes in their modern slavery statement.

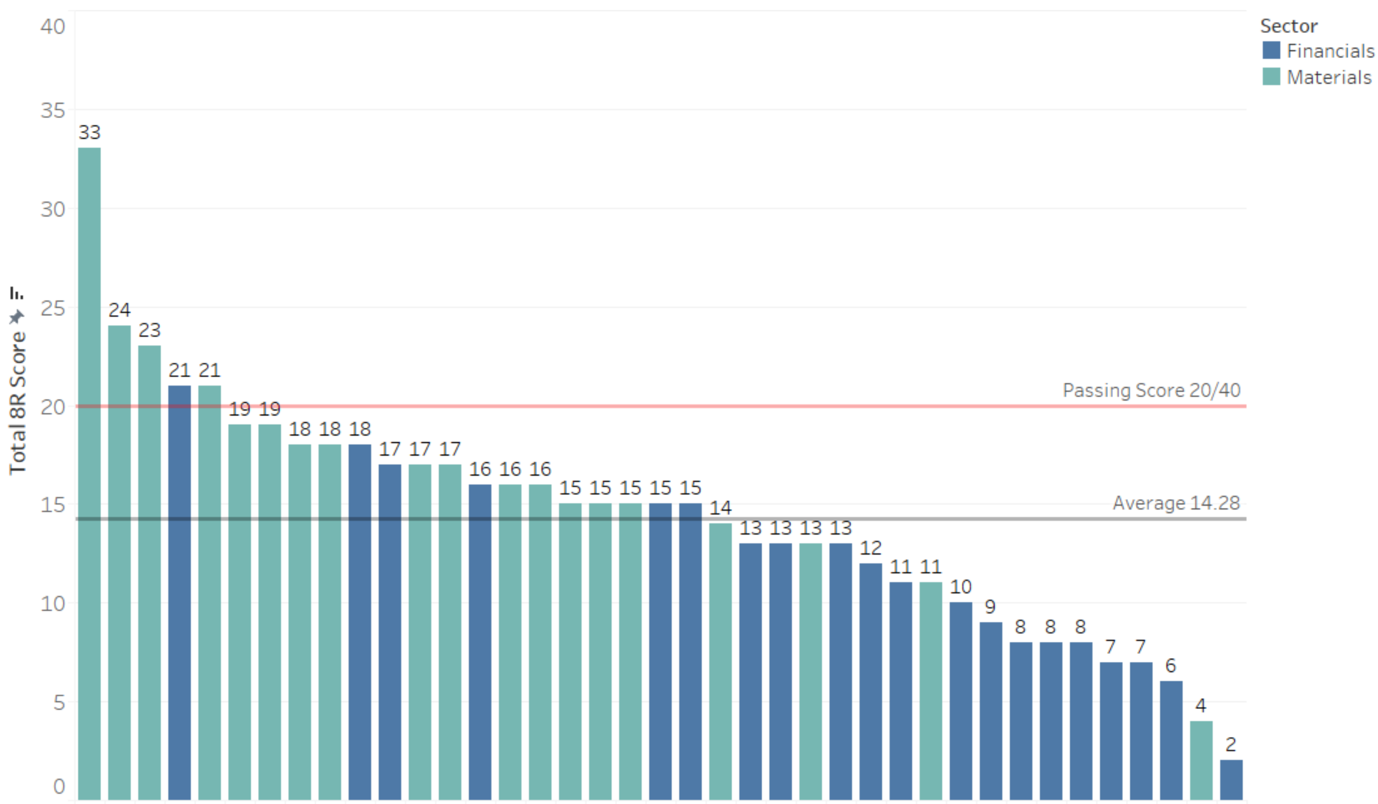


*Figure 3: The Total 8R Score of All Reviewed Companies*

The observation that most of these companies score below 20 out of 40 indicators suggests underdeveloped disclosure of specific information about the company's mechanism design, the complainant journey, grievances received, remedies, review and outcomes in their modern slavery statements.

## Sectoral analysis

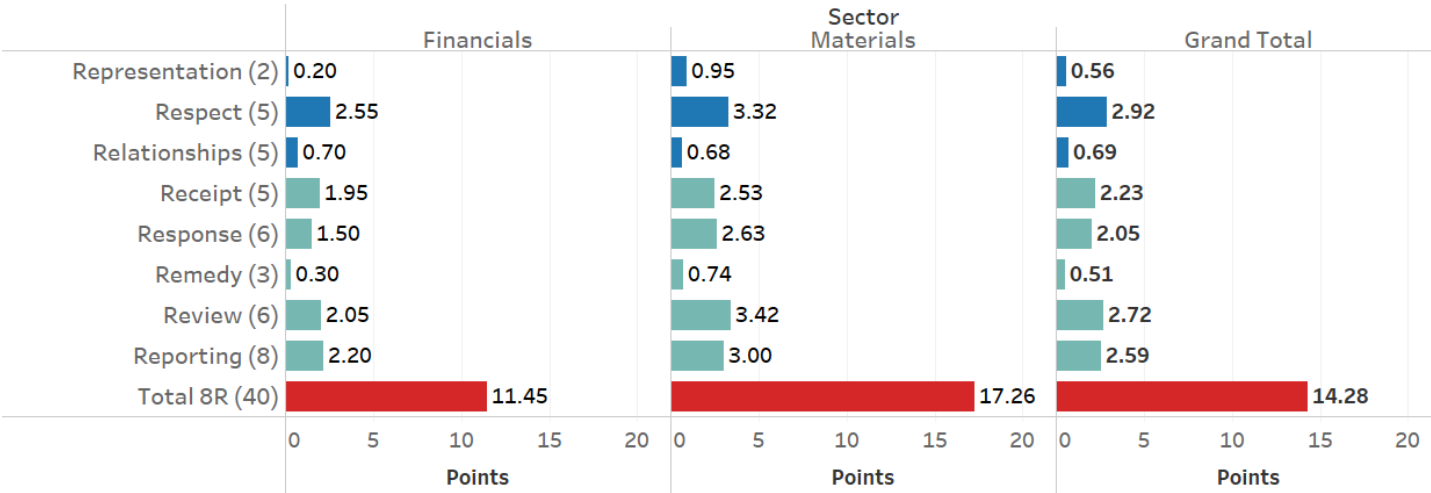


*Figure 4: Average disclosure score by pillar*

Several noteworthy findings emerged from the analysis:

Materials companies, on average, noticeably disclose more 8R information than Financials companies, over 17 versus 11 questions out of 40 (Figure 4). Except for a similar score for *Relationships,* in which both sectors receive a very low score, Materials statements have substantially more disclosures than those of Financials companies across all other pillars of the 8R framework.

Among the three foundational pillars, *Representation*, *Respect* and *Relationships* highlighted by the blue bars in Figure 4, *Respect* is the strongest pillar for which both Financials and Materials sectors score well with 2.55 and 3.32 points out of 5, respectively, indicating that slightly more than half of the questions are answered YES. Both *Representation* and *Relationships* are relatively weak, indicating limited disclosure about user participation in design and integration with the wider remedy ecosystem.

In practical terms, the Materials sector appears more likely to discuss grievance mechanisms in connection with operational settings, workers, suppliers, communities and human rights standards, and to provide information about the number of grievances received and handled, producing somewhat richer disclosure on the process, case handling, leverage and review. The Financials sector, by contrast, more often relies on high-level ethics or whistleblowing disclosures, which may signal that concerns can be raised but provide less insight into whether complainants can access dialogue, support, remedy and external escalation pathways.

This does not mean Materials companies necessarily operate more effective systems in practice. It does suggest, however, that Materials statements more often communicate grievance mechanisms as part of a broader human rights due diligence and remediation architecture, whereas Financials statements more often communicate them as governance or misconduct channels.

## Findings by Pillar

| Pillar | Question ID | Question | Financials | Sector Materials | Grand Total |
|---|---|---|---|---|---|
| **Representation** | Q1.1 | Does the company explicitly reference international human rights standards as the normative basis for its grievance mechanism design? | 15% | 79% | **46%** |
| | Q1.2 | Does the company consult affected stakeholders or their legitimate representatives in grievance mechanism design? | 5% | 16% | **10%** |
| **Respect** | Q2.1 | Does the mechanism accept grievances across all human rights issues, or is it limited to modern slavery? | 85% | 100% | **92%** |
| | Q2.2 | Is the company's grievance mechanism available in multiple languages of potentially affected stakeholders? | 20% | 63% | **41%** |
| | Q2.3 | Does the company's grievance mechanism ensure confidentiality? | 80% | 89% | **85%** |
| | Q2.4 | Does the mechanism include explicit anti-retaliation protections to avoid reprisal? | 70% | 68% | **69%** |
| | Q2.5 | Does the company incorporate trauma-informed principles in the design and operation of its grievance mechanism? | 0% | 11% | **5%** |
| **Relationships** | Q3.1 | Does the mechanism have documented referral protocols to law enforcement, labour authorities, and support services for cases involving suspected criminal conduct or serious harm? | 35% | 11% | **23%** |
| | Q3.2 | If the company reports a grievance to police, do they notify and consult with the complainant or their legitimate representatives? | 0% | 0% | **0%** |
| | Q3.3 | Does the company belong to collaborative grievance mechanisms if available, e.g., industry, multistakeholder? | 10% | 11% | **10%** |
| | Q3.4 | Does the company explicitly commit to cooperating in other grievance mechanisms, e.g., courts, tribunals, OECD NCPs, UN Special Procedures? | 5% | 5% | **5%** |
| | Q3.5 | Does the company require its suppliers to have grievance mechanisms? | 20% | 42% | **31%** |

*Figure 5: Disclosure rate to each question of Representation, Respect and Relationships Pillars*

Figure 5 shows uneven disclosure across *Representation*, *Respect* and *Relationships*. Q1.1 captures explicit normative grounding in international human rights standards for its GM design, and there is a stark contrast between the answers of the financial and material companies. 79% (15 out of 19) of companies in the Materials sector score a YES, versus only 15% (three out of 20) of Financials companies. A small number explicitly state that their grievance mechanism is designed to align with the effectiveness criteria of UNGP Principle 31, which represents the strongest disclosure under this pillar. In Financials, references to international standards regarding grievance design are far less common, and structural reliance on whistleblowing frameworks predominates.

Only four companies (10%) in the sample have evidence of consulting affected stakeholders or their legitimate representatives during the design process, per Q1.2 under *Representation*, even though the UNGP 31(h) requires GMs to be designed in dialogue with those for whom they are intended. This seems similar to an international observation reported by the World Benchmarking Alliance (2024), which found that only 6% of the reviewed companies explained how users were involved in mechanism design and performance.

In practical terms, without consulting affected stakeholders, mechanisms may be designed from the inside out rather than from the perspective of intended users. Disclosing how workers, suppliers' workers, communities, unions or civil society have been consulted to shape the design would enhance trust in the mechanisms.

Under the *Respect* pillar, disclosures cover questions Q2.1, Q2.3 and Q2.4 relatively well. 100% (85%) of Materials (Financials) companies mention explicitly that their GMs cover human rights issues. Most statements describe ensuring confidentiality and anti-retaliation protections to avoid reprisal. 63% of Materials companies report having GMs in multiple languages of potentially affected stakeholders, compared with 20% of Financials companies. Q2.5, about whether companies incorporate trauma-informed principles in GM design and operation, receives the lowest points, which is almost absent from disclosure. Only 5% (two statements) in the sample have relevant information to this question.

While not explicitly mentioning trauma-informed principles, both companies that receive a point for this question provide non-investigative resolution options for those impacted, wellness, psychological and other emotional and mental support. The OHCHR (2021) issues additional guidance, which includes companies having suitably qualified personnel or investing in training so that they can relate to right-holders in a culturally appropriate and sensitive manner, especially when there is trauma.

The *Relationships* pillar is weak across both sectors. Very few companies describe collaborative grievance mechanisms, cooperation with external mechanisms such as OECD NCPs or tribunals, or complainant-centred approaches when law enforcement referrals occur. While almost a quarter of the companies mention referring to law enforcement and other external authorities, none mention whether they notify or consult the complainant or their legitimate representatives when reporting a grievance to the police. This question is informed by the work of Anti-Slavery Australia (2022) on migrant workers' vulnerabilities in law-enforcement referrals, as well as insights from the CSO roundtable.

Q3.3 on collaborative GMs and Q3.4 on other external GMs, such as courts, tribunals, and the OECD NCPs, also receive a low disclosure rate, with only 10% and 5% of companies mentioning them, respectively. 31% of companies report that they require their suppliers to have GMs.

This matters because grievance mechanisms do not operate in isolation. Better practice under the 8R framework would mean showing how company channels interact effectively with the wider remedy ecosystem of external mechanisms, and how complainants are protected and consulted when external referrals are made, as guided by UNGPs 29–31 and UNGP 25.

| Pillar | Question ID | Question | Sector Financials | Sector Materials | Grand Total |
|---|---|---|---|---|---|
| **Receipt** | Q4.1 | Does the company proactively communicate the grievance mechanism and complaint process in ways that are accessible to affected stakeholders? | 75% | 95% | **85%** |
| | Q4.2 | Does the company provide multiple channels for reporting a grievance, e.g., in-person, phone, online, third-party operated hotlines or through different business functions? | 95% | 100% | **97%** |
| | Q4.3 | Does the company support affected stakeholders submitting grievances so they can participate in the grievance process in a fair and informed way, e.g., technical, financial, legal, linguistic, and psychoso.. | 15% | 32% | **23%** |
| | Q4.4 | Does the mechanism explicitly permit submission by legitimate representatives (including trade unions, worker representatives, civil society organisations, and legal counsel) acting on behalf of co.. | 5% | 11% | **8%** |
| | Q4.5 | Does the company timely acknowledge receipt of grievances? | 5% | 16% | **10%** |

*Figure 6: Disclosure rate to the Receipt pillar questions*

*Figure 6* shows that companies perform relatively well on some basic features under the *Receipt* pillar. Across both sectors, most companies say they proactively communicate about their GMs to potentially affected groups and provide multiple channels for raising grievances.

However, far fewer companies (only 23%) describe supporting complainants so they can participate in a fair and informed way. Similarly, only 8% of companies explicitly allow submissions by representatives such as unions or CSOs and 10% provide timely acknowledgement of receipt.

In *Receipt*, Materials companies outperform Financials. Yet, the disclosure rates remain low, suggesting that while companies have built and promoted grievance channels, fewer have described the support and communication provided to complainants during the submission process. Under the 8R framework, companies can improve by explaining not only where/how complaints can be made, but also who can submit them, what assistance is available and what users can expect immediately after submission.

| Pillar | Question ID | Question | Sector Financials | Sector Materials | Grand Total |
|---|---|---|---|---|---|
| **Response** | Q5.1 | Does the mechanism publish clear, indicative timeframes for each stage, the range of possible outcomes, and how outcomes will be communicated? | 5% | 5% | **5%** |
| | Q5.2 | Does the company assess whether it potentially caused, contributed to or is directly linked to the grievance in line with the UNGPs? | 35% | 74% | **54%** |
| | Q5.3 | Does the company engage in structured dialogue with complainants and/or their legitimate representatives during the grievance process? | 10% | 53% | **31%** |
| | Q5.4 | If the company and the complainant cannot agree on a resolution, can the grievance be escalated to independent third-party mediation at no cost to the complainant? | 0% | 5% | **3%** |
| | Q5.5 | Does the company provide training to staff responsible for handling grievances and supporting complainants? | 40% | 42% | **41%** |
| | Q5.6 | Do the relevant company functions participate in handling grievances, e.g., human resources, human rights, procurement, legal, finance, sustainability/ESG, operations? | 60% | 84% | **72%** |

*Figure 7: Disclosure rate to the Response pillar questions*

Figure 7 on the *Response* pillar shows that companies are much more likely to describe who is involved in handling grievances than how the response process works for complainants.

Across both sectors, the strongest area is multi-function involvement: 72% of companies state that relevant functions (such as HR, procurement, legal, finance or ESG) participate in handling grievances (Q5.6), with materials firms (84%) ahead of financials (60%). Training for staff responsible for grievances (Q5.5) is reported by around two-fifths of companies overall (41%), with near-parity between sectors.

A majority (54%) say they assess whether they caused, contributed to or are directly linked to a grievance in line with the UNGPs (Q5.2), but this is driven mainly by materials companies (74% vs 35% in financials). By contrast, very few firms publish clear timeframes, outcome ranges, and communication commitments (Q5.1: 5%), engage in structured dialogue with complainants or their representatives (Q5.3: 31% overall, but 53% in materials vs 10% in financials), or provide for escalation to independent third-party mediation (Q5.4: 3%).

Disclosures suggest that internal governance around grievance handling (who is involved, training, case assessment) is more developed than safeguards such as clarity on timelines, structured dialogue and access to independent mediation. This points to a significant disclosure gap between building internal structures for managing grievances and ensuring that complainants experience a predictable, participatory and rights-compatible response process.

This finding is similar to what was noted by Laplante (2023), that few companies have GMs at the most advanced level, which requires clearly published procedural information on grievance submission and handling, mediation, dialogue, facilitation, and/or capacity building as part of the complaint review process.

| Pillar | Question ID | Question | Sector Financials | Sector Materials | Grand Total |
|---|---|---|---|---|---|
| **Remedy** | Q6.1 | Does the company's grievance mechanism have the capacity to provide a full range of remedies, including restitution, compensation, rehabilitation, satisfaction, guarantees of non-repetition, and referral to external legal or psychosocial services? | 0% | 11% | **5%** |
| | Q6.2 | Does the company consult complainants or their legitimate representatives on the satisfactoriness and adequacy of remedies provided? | 0% | 11% | **5%** |
| | Q6.3 | Where the company is directly linked to a grievance (but did not cause or contribute to it), does it seek to use and build its leverage — including through collaboration with other buyers, investors, or civil society — to influence the responsible party to provide remedy? | 30% | 53% | **41%** |

*Figure 8: Disclosure rate to the Remedy pillar questions*

The *Remedy* pillar is among the weakest areas of disclosure across both sectors (Figure 8). Only 5% of companies state that their grievance mechanisms can provide a full range of remedies (Q6.1) or that they consult complainants on the adequacy of remedies (Q6.2). In both cases, this disclosure appears only among a small number of Materials companies (11%) and not at all among Financials. By contrast, 41% of companies describe using their leverage to influence other parties, such as suppliers, to provide remedy (Q6.3), with higher disclosure among Materials companies.

The key implication is that most companies emphasise leverage for remedy in "linked" situations but say very little about their own remedial capacities. Few involve complainants in assessing whether remedies are satisfactory. This suggests a significant gap between the UNGPs' full notion of remedy – covering restitution, compensation, rehabilitation, guarantees of non-repetition and participatory evaluation – and what Australian financial and material companies currently disclose about their remediation.

The 8R framework points to a practical improvement path: companies should explain the range of remedies available, distinguish remedy from case closure, involve complainants in evaluating adequacy, and clarify how leverage will be used when harm is linked through suppliers or other business relationships.

| | | | Sector | | |
|---|---|---|---|---|---|
| Pillar | Question ID | Question | Financials | Materials | Grand Total |
| **Review** | Q7.1 | Does the company periodically and systematically review the effectiveness of its grievance mechanism, i.e., its design and operation, against defined key performance indicators (e.g., a.. | 50% | 74% | **62%** |
| | Q7.2 | Does the company consult complainants/ affected stakeholders to review the effectiveness, including whether they know and trust the grievance mechanism? | 5% | 32% | **18%** |
| | Q7.3 | Does the company involve independent third parties (e.g., external auditors, civil society organisations, academic researchers) in reviewing the effectiveness of its grievance mechani.. | 10% | 37% | **23%** |
| | Q7.4 | Does the company conduct root-cause analysis of systemic issues identified through grievance data? | 10% | 32% | **21%** |
| | Q7.5 | Are findings from effectiveness reviews documented and translated into specific changes to mechanism design or operation? | 35% | 68% | **51%** |
| | Q7.6 | Does senior management oversee and is accountable for the grievance mechanism? | 95% | 100% | **97%** |

*Figure 9: Disclosure rate to the Review pillar questions*

A good number of companies report periodically reviewing effectiveness against defined KPIs (Q7.1: 62% overall) and translating review findings into concrete changes to mechanism design or operation (Q7.5: 51% overall). This is substantially higher than the international companies reviewed by the CHRB (2020), in which only four of the 229 global companies took measures to evaluate the effectiveness of their GMs.

However, Figure 9 shows that companies are far more likely to review grievance mechanisms internally than to involve affected stakeholders or independent parties in that review. Only 18% of companies say they consult complainants or affected stakeholders on whether they know and trust the mechanism (Q7.2), 23% involve independent third parties such as auditors or civil society in effectiveness reviews (Q7.3), and 21% report conducting root-cause analysis of systemic issues identified through grievance data (Q7.4); on all three questions, Materials firms again outperform Financials but absolute levels remain low.

Across both sectors, almost all companies state that senior management oversees and is accountable for the grievance mechanism (Q7.6).

Under the 8R framework, stronger practice would connect KPI review with stakeholder trust, external challenge, root-cause analysis and documented changes to the mechanism.

| Pillar | Question ID | Question | Sector: Financials | Sector: Materials | Grand Total |
|---|---|---|---|---|---|
| **Reporting** | Q8.1 | Does the company report the total number of grievances received through its mechanisms in the reporting period? | 45% | 58% | **51%** |
| | Q8.2 | Of those, does the company report the number relating to modern slavery or other human rights issues? | 70% | 84% | **77%** |
| | Q8.3 | Does the company report the grievances it caused or contributed to? | 5% | 16% | **10%** |
| | Q8.4 | Does the company disclose remediation outcomes and the proportion of grievances resolved to the complainant's satisfaction? | 0% | 11% | **5%** |
| | Q8.5 | Does the company publicly report the average or median time taken to complete remedied grievances? | 0% | 0% | **0%** |
| | Q8.6 | Does the company disclose anonymised case examples of grievances received or remedied? | 10% | 26% | **18%** |
| | Q8.7 | Does the company have a formal process for reporting grievance mechanism performance to the board or a relevant board committee on a regular basis? | 85% | 84% | **85%** |
| | Q8.8 | Does the company adopt any internationally recognised reporting standards/ frameworks for reporting grievances and remediation? | 5% | 21% | **13%** |

*Figure 10: Disclosure rate to the Reporting pillar questions*

Across the *Reporting* pillar, companies are more comfortable disclosing grievance numbers than substantive information about outcomes, timelines or case examples; see Figure 10.

Around half of the sample (51%) report the total number of grievances received in the period (Q8.1), and more than three-quarters (77%) report the number relating to modern slavery or other human rights issues (Q8.2), with Materials companies consistently ahead of Financials on both measures. These figures demonstrate reporting transparency; however, reported grievance counts need further context. Zero complaints is not the objective of a GM. Rather, it may reflect a true absence of incidents or limited stakeholder awareness, barriers to access, or a lack of trust in GMs as an effective channel for raising concerns and having them addressed (Equator Principles, 2022).

By contrast, only small minorities mention assessing the grievances they caused or contributed to (Q8.3: 10%), disclose remediation outcomes and proportions resolved to the complainant's satisfaction (Q8.4: 5%), report the time taken to complete remedied grievances (Q8.5: 0%), or provide anonymised case examples (Q8.6: 18%).

Governance-level reporting is much stronger: 85% of companies say they have a formal process for reporting grievance mechanism performance to the board or a relevant board committee (Q8.7), but only 13% state that they use internationally recognised reporting standards or frameworks for grievances and remediation (Q8.8).

In summary, better *Reporting* under the 8R framework would include more outcome-focused disclosure: what kinds of grievances were handled, what remedies were provided, how long resolution took, what was learned, and how cases illustrate system functioning while preserving anonymity.

## What the sector gap means in practice

The Materials–Financials comparison matters because rather than simply different averages, the disclosure gap points to potentially different implementation challenges driven by the sector-specific nature of their operations and supply chains. Materials sector companies have tangible operations and high-risk multi-tier global supply chains for raw and processed materials, with well-documented modern slavery, labour and community risks at extraction, processing and logistics stages. This makes grievance mechanisms and remediation more operational. Materials companies also tend to have more direct engagement with the local community via projects, so companies are often required and/or expected to have project-level grievance mechanisms.

Materials companies also benefit from existing sector-specific guidance on GMs and remediation, such as the Walk Free & Human Rights Resources and Energy Collaborative (HRREC) Response and Remedy Framework.

In contrast, Financials companies are potentially linked to human rights and modern slavery risks through lending, investment, and other financial services rather than through direct site operations. Some companies use the existing whistleblowing mechanism, which tends to be designed for customers and employees to report misconduct rather than as a survivor-centred modern slavery grievance mechanism. Therefore, the description of the whistleblowing mechanism in the modern slavery statement often lacks details on consultation with targeted users, remedies provided and links to external mechanisms.

Taken together, these sector-specific factors offer plausible interpretations of the observed disclosure gap, but the study does not test them causally. Further research could examine external disclosure practices, operating exposure and mechanism type as potential explanatory factors.

# Case study

## Using the 8R framework for internal review and disclosure improvement

In this case study, the University of Sydney (USYD), a project partner, applied the 8R framework in its internal review. The university's self-review illustrates how the 8R framework can be used to assess the underlying practices of grievance mechanisms and remediation, as well as the relevant information disclosed in its modern slavery statement. This dual review shows why the 8R framework works both as a practical management tool and a disclosure tool.

The exercise is an illustrative example only. It is not provided to represent a validation of either the 8R framework or USYD's practice. The score under USYD's "current practice" is drawn from an evidence base that is broader than the source boundary used for the assessment of Materials and Financials ASX100 companies presented in the previous section of this report, so the scores are not directly comparable. The review results and qualitative comments from USYD are detailed in Appendix 2.

The University's self-assessment suggests strong practice against the 8R Framework; however, the modern slavery statement reflects only part of current practice. Reviewing the current practice, USYD records 34 YES responses across the 8R pillars, including stakeholder consultation in design, confidentiality, anti-retaliation, trauma-informed design, referral pathways, complainant support, representative submissions, acknowledgement timeframes, training, multi-function involvement, remedy range, review activity and reporting metrics. On the disclosure review, USYD scored only 23 YES responses out of 40. Each practice and disclosure score is supported by a specific evidence source.

| **The University of Sydney's Review** | | **Number of YES responses** | |
|---|---|---|---|
| **Pillar** | **Number of questions** | **Current Practice** | **Disclosure in the Modern Slavery Statement** |
| R1 - Representation | 2 | 2 | 2 |
| R2 - Respect | 5 | 4 | 4 |
| R3 - Relationships | 5 | 4 | 2 |
| R4 - Receipt | 5 | 4 | 2 |
| R5 - Response | 6 | 6 | 5 |
| R6 - Remedy | 3 | 2 | 2 |
| R7 - Review | 6 | 6 | 1 |
| R8 - Reporting | 8 | 6 | 5 |
| **TOTAL** | **40** | **34** | **23** |

Aspects presented in current practice but not yet fully reflected in the modern slavery statement are mostly in *Review*. USYD initiated a review of its grievance mechanism in 2025, where people with lived experience, students and civil society organisations were asked to provide feedback on the grievance mechanism. The university conducted root cause analysis. Based on the review, the university has refined the language and structure of the reporting form and the Grievance Mechanism Response Guidelines. Senior management is designated to oversee the grievance mechanism. So, in its current practice, USYD has addressed all questions asked under the *Review* pillar. However, its modern slavery statement provides limited information about the review of its grievance mechanism and the resulting findings and implementation. Only one out of six aspects of *Review* is mentioned in the modern slavery statement.

Benchmarking USYD's grievance mechanisms and remediation practice against the 8R Framework highlights further areas for improvement, including multilingual accessibility, collaboration with external grievance mechanisms, providing multiple channels, consulting complainants on remedy adequacy, and tracking and reporting on the time taken to complete remedied grievances.

The 8R framework focuses on whether a mechanism exists, whether it contains the features expected under the 8R framework, and whether those features are visible to external stakeholders through public reporting in the modern slavery statement. While we only focus on the information provided in the modern slavery statement in this research, the scope for the review could and indeed should be extended to all publicly accessible documents and websites.

An organisation can conduct a similar review in the following steps:

1. Prepare all sources of documents for review: sources include, but are not limited to, current policies, procedures, reports, guidance documents, training materials, protocols, committee charters, meeting minutes, modern slavery statement, and web pages.
2. Separate practice from disclosure: Create two scoring columns, as in the USYD example: one for current practice and one for current public reporting in the modern slavery statement.

3. Assess: Answer each question in the 8R Framework with YES/NO, provide further description and note down the source of evidence for each score.
4. Analyse gaps: Use the gaps between the current practice and disclosure to identify and prioritise improvement. Questions that score NO in practice may indicate possible design or operational weakness. Questions that score YES in practice but NO in disclosure point to reporting and communication priorities.
5. Plan further actions: Document the areas for further improvement and design an action plan for implementation.

For organisational use, the framework should be applied in two columns: verified practice (with evidence) and specific public disclosure (in the modern slavery statement and/or any other publicly accessible documents). A practice YES requires documentary or other verifiable evidence, while a disclosure YES requires explicit information within the selected public source boundary.

The USYD case study suggests that an organisation may have built more mature grievance arrangements internally than are visible externally through its public modern slavery statement. It also raises the question of whether reporting entities are expected to provide such detail on grievance mechanisms, grievances received and remedied, and their effectiveness. This question awaits further government guidance.

## Implications and recommendations

This report shows that grievance mechanism and remediation disclosure in FY2024 modern slavery statements remains underdeveloped across both Financials and Materials companies in the ASX100 sample. While Materials companies provide more information than Financials on average, the broader pattern in both sectors is the same: companies are more comfortable describing channels, oversight and internal governance than describing aspects related to the quality of the user journey such as consulting stakeholders during the design of the mechanism, improving accessibility, support for and communication with complainants during the process, consulting with users to understand remedy satisfaction, reviewing and reporting on the effectiveness of the mechanisms.

The weakest areas of disclosure are central to whether grievance mechanisms can function as meaningful pathways to remedy, remedy adequacy, and links to external systems.

The report therefore should be read as a constructive diagnosis. The low and uneven scores do not prove that companies lack practices beyond what is disclosed, but they do show that current modern slavery statements often provide stakeholders with little information to understand whether those practices are effective.

For companies, the 8R framework is most useful when treated as a review tool to identify a roadmap for improvement rather than only as a scoring instrument. For company practitioners, each pillar translates into a practical set of design and disclosure questions that can help close the gap between minimum statement disclosure and more credible grievance architecture and implementation.

For investors and CSOs, the framework also offers a structured basis for disclosure expectations and engagement priorities. It helps distinguish between *high-level statements* that mention the existence of the channels and stronger disclosure with explicit *pillar-level evidence* that demonstrates whether grievance mechanisms are designed, operated, and reviewed effectively to support remedy. Instead of treating the total score as proof of effectiveness, companies and investors should pay particular attention to rights-holder participation, accessibility, remedy adequacy, independent challenge and evidence of learning.

For government and regulators, the 8R framework offers a consistent, evidence-based reference points for developing guidance under the Modern Slavery Act on what meaningful disclosure about grievance mechanisms and remediation should include. Consideration should be given to how to standardise disclosure requirements to improve transparency in reporting, handling of grievances and providing remedy, while protecting the privacy of those involved.

The currently proposed reform of introducing the "failure to prevent modern slavery" offence as outlined in the government's consultation paper issued in August 2026 – *Strengthening Australia's Legislative Response to Modern Slavery in Supply Chains* – significantly increases the relevance of the 8R framework. While the consultation is still seeking feedback from stakeholders to finalise the elements of the offence, defences and potential guidance, under the proposal, large companies could be held criminally liable for failing to prevent modern slavery in supply chains unless they can demonstrate that they have taken reasonable steps to prevent it.

The 8R framework could help government translate the reasonable steps involving GMs and remediation into practical guidance. *Representation*, *Respect* and *Relationships* assess whether affected workers and stakeholders are meaningfully involved and whether mechanisms are trusted and appropriate to their circumstances. *Receipt* and *Response* examine whether concerns can be safely raised, investigated and escalated. *Remedy* considers whether harm is addressed through effective, victim-centred outcomes. *Review* and *Reporting* are about whether companies monitor effectiveness, learn from cases and maintain evidence of continuous improvement.

While the "reasonable steps" should be proportionate to each company's situation, the 8R framework offers a structured rubric for regulators to develop further guidance, assess the credibility of corporate practices, and inform compliance monitoring and enforcement. The 8R framework offers a common language for these tasks because it is grounded in the UNGPs' effectiveness criteria, which apply across sectors and sizes. Its value lies in making evidence gaps visible while acknowledging that transparency is necessary but not sufficient for an effective pathway to remedy.

Clearer disclosure expectations and guidance are needed if modern slavery statements are to become a more useful accountability mechanism for grievance and remediation.

# APPENDIX 1

| Pillar | Question No. | Question | UNGP Effectiveness Criteria | References |
|---|---|---|---|---|
| **Representation** | Q1.1 | Does the company explicitly reference international human rights standards (e.g., UNGPs, OECD Guidelines, ILO Conventions, or other equivalent international human rights frameworks) as the normative basis for its grievance mechanism design? | This question addresses UNGP 31(a) – *legitimacy* and 31(f) *rights-compatible:* mechanisms grounded in internationally recognised standards that have institutional legitimacy. | UNGP 31<br>OECD Guidelines for MNEs (2023)<br>ILO Tripartite Declaration of Principles Concerning MNEs<br>ISO 26000 (Social Responsibility)<br>Harrison et al. (2023) |
| | Q1.2 | Does the company consult affected stakeholders or their legitimate representatives in grievance mechanism design? | This question aligns with UNGP 31(h) *engagement-and-dialogue* requirement. | UNGP 31<br>UN Global Compact Network Australia (2021)<br>IPIECA (2012)<br>Rees (2011)<br>Equator Principles (2022) |
| **Respect** | Q.2.1 | Does the mechanism accept grievances across all human rights issues, or is it limited to only modern slavery? | This question can be justified under the UNGP 31 (f) - the *rights-compatible* criterion.<br>This question concerns which issues the grievance mechanism addresses. | UNGP 31<br>OHCHR (2021)<br>UN Global Compact Network Australia (2021) |
| | Q2.2 | Is the company's grievance mechanism available in multiple languages of potentially affected stakeholders? | Language accessibility is a core requirement under GP 31(b) - *accessible*. | UNGP 31<br>Anti-Slavery International (2021)<br>IFC Performance Standard 1<br>Australian Government Modern Slavery Guidance (2025)<br>Equator Principles (2022) |
| | Q2.3 | Does the company's grievance mechanism ensure confidentiality? | This question relates to UNGP 31(d) *Equitable*.<br>Companies should balance the need for public disclosures and transparency with respect for confidentiality. | UNGP 31<br>IFC (2009) Good Practice Note on complainant protection<br>Australian Human Rights Commission (2023) on safe complaint handling<br>UNGCNA (2021) |
| | Q2.4 | Does the mechanism include explicit anti-retaliation protections to avoid reprisal? | This question addresses UNGP 31 (d): *Equitable*; also (b) *Accessible* – fear of retaliation is a barrier to mechanism use. | UNGP 31<br>Anti-Slavery Australia (2022)<br>AHRC (2021)<br>UNGCNA (2021)<br>Equator Principles (2022) |

| Pillar | Question No. | Question | UNGP Effectiveness Criteria | References |
|---|---|---|---|---|
| | Q2.5 | Does the company incorporate trauma-informed principles in the design and operation of its grievance mechanism? | This question relates to the UNGP 31 (d) - *Equitable*, and (f) *Rights-compatible* – trauma-informed practices protect human dignity throughout the process. | UNGP 31<br>HerSpace (2025)<br>Australian Human Rights Commission (2021)<br>REDRESS (2024) |
| **Relationships** | Q3.1 | Does the mechanism have documented referral protocols to law enforcement, labour authorities, and support services for cases involving suspected criminal conduct or serious harm? | This question relates to the UNGP 31 (f) *Rights-compatible* – referral protocols must not restrict victims' access to judicial or state-based remedies; and (a) *Legitimate* – reliance on independent external bodies enhances trust | UNGPs<br>OHCHR Access to Remedy Guide (2024)<br>IFC (2006) Good practice note<br>HerSpace (2006) |
| | Q3.2 | If the company reports a grievance to police, do they notify and consult with the complainant or their legitimate representatives? | This question relates to UNGP 31 (d) *Equitable* and (f) *Rights-compatible*. | UNGPs<br>REDRESS (2024) Practice Note 11 on survivor-centred approach<br>Anti-Slavery Australia (2022) on migrant worker vulnerabilities in law enforcement referrals |
| | Q3.3 | Does the company belong to collaborative grievance mechanisms if available, e.g., industry, multistakeholder? | This question relates to UNGP 31 (a) – *legitimate:* participation in multi-stakeholder mechanisms enhances legitimacy through independent oversight. | UNGPs<br>Harrison et al. (2023) on MSI grievance mechanism effectiveness<br>UN Global Compact Australia (2021) |
| | Q3.4 | Does the company explicitly commit to cooperating in other grievance mechanisms, e.g., courts, tribunals, OECD NCPs, UN Special Procedures? | This question relates to UNGP 31 (f) *rights-compatible* as corporate mechanisms must not obstruct or substitute for state-based and judicial mechanisms. To satisfy this question, the company has a documented policy of actively cooperating with external mechanisms. | UNGPs<br>OHCHR (2024): Access to Remedy Guide<br>Harrison et al. (2024) on cooperation obligations<br>OECD Guidelines (2023) |
| | Q3.5 | Does the company require its suppliers to have grievance mechanisms? | This question relates to UNGP 31 (b) *accessible* and (h) *engagement and dialogue*.<br>Ideally, at the aspirational level, a company should (a) require suppliers to have grievance mechanisms, (b) verify | UNGPs<br>Walk Free (2024): Modern Slavery and Remediation - An Investor's Guide<br>Modern Slavery and Human Rights Policy Evidence Centre (PEC)(2022) on supply chain governance |

| Pillar | Question No. | Question | UNGP Effectiveness Criteria | References |
|---|---|---|---|---|
| | | | their existence, (c) provide guidance or capacity support, and (d) extend its own mechanism to supply chain workers where supplier mechanisms are absent. | |
| **Receipt** | Q4.1 | Does the company proactively communicate the grievance mechanism and complaint process in ways that are accessible to affected stakeholders? | This is an accessibility question, as a pre-submission channel-awareness item, UNGP 31 (b) – *accessible*.<br>Supply chain workers and migrant workers are among the groups with limited access to corporate communications and they are the hardest-to-reach populations. | UNGPs<br>IFC (2009) *Good Practice Note*<br>IPIECA (2012) on intake protocols<br>Labour Solutions (2026) on triangulated assessments of mechanism awareness<br>UN Global Compact Network Australia (2021)<br>Equator Principles (2022)<br>ILO (2023) |
| | Q4.2 | Does the company provide multiple channels for reporting a grievance, e.g., in-person, phone, online, third-party operated hotlines or through different business functions? | This question relates to UNGP 31 criterion (b) *Accessible*.<br>To be effective, mechanisms must be known to and usable by all intended users. | UNGPs<br>Anti-Slavery International (2021)<br>IPIECA (2024)<br>OHCHR, 2024<br>Equator Principles (2022)<br>CHRB's 2026 Methodology<br>ILO (2023) |
| | Q4.3 | Does the company support affected stakeholders submitting grievances so they can participate in the grievance process in a fair and informed way, e.g., technical, financial, legal, linguistic, and psychosocial support? | This question addresses UNGP 31 criterion (d) – *Equitable*. Complainants must have access to sources of information, advice, and expertise to engage on fair terms. | UNGPs<br>IPIECA (2012)<br>World Bank–CAO (2008)<br>AHRC (2021)<br>CHRB's 2026 Methodology<br>ILO (2023) |
| | Q4.4 | Does the mechanism explicitly permit submission by legitimate representatives (including trade unions, worker representatives, civil society organisations, and legal counsel) acting on behalf of complainants? | This question addresses UNGP 31 criterion (d) - *Equitable* and (b) – *Accessible*.<br>This question is critical for modern slavery cases where survivors may be unable to submit personally. | UNGPs<br>OHCHR (2021) guidance on representation rights<br>International Commission of Jurists (ICJ) (2019) on procedural fairness<br>Anti-Slavery International (2021).<br>UNGCNA (2021)<br>ILO (2023) |

| Pillar | Question No. | Question | UNGP Effectiveness Criteria | References |
|---|---|---|---|---|
| | Q4.5 | Does the company timely acknowledge receipt of grievances? | This question partially addresses UNGP 31 criterion (c) – *Predictable:* mechanisms must provide a clear, known procedure with indicative timeframes. | UNGPs<br>IPIECA (2012)<br>IPIECA (2024)<br>World Bank CAO (2008)<br>Equator Principles (2022) |
| **Response** | Q5.1 | Does the mechanism publish clear, indicative timeframes for each stage, the range of possible outcomes, and how outcomes will be communicated? | This question addresses the transparency of the full procedural timeline, in line with UNGP 31 criterion (c) *Predictable* and (e) *Transparent*. | UNGPs<br>IPIECA (2024)<br>OHCHR (2021) guidance on procedural information<br>IPIECA (2012)<br>Rees, C. (2011)<br>Equator Principles (2022)<br>CHRB's 2026 Methodology<br>ILO (2023) |
| | Q5.2 | Does the company assess whether it potentially caused, contributed to or is directly linked to the grievance in line with the UNGPs? | This question relates to the triage and case assessment step that occurs after intake, aligning with<br>UNGP 13, 17, and 19 on the cause/ contribute/ linked framework.<br>It addresses UNGP 31 criterion (f) *Rights-compatible* (d) *Equitable* because proper attribution determines the level of remedy obligation. | UNGPs<br>OECD Guidelines (2023) Chapter IV on due diligence<br>Harrison et al. (2024) on cause/contribute/linked analysis under mandatory HRDD laws<br>CHRB's 2026 Methodology |
| | Q5.3 | Does the company engage in structured dialogue with complainants and/or their legitimate representatives during the grievance process? | This question addresses UNGP 31 criterion (h) *Engagement and dialogue,* and (d) *Equitable*. | UNGPs<br>Harrison et al. (2023)<br>Rees (2011)<br>Equator Principles (2022) |
| | Q5.4 | If the company and the complainant cannot agree on a resolution, can the grievance be escalated to independent third-party mediation at no cost to the complainant? | This question relates to UNGP 31 criterion (d) *Equitable* and (f) *Rights-compatible*. Cost is often a barrier, and "At no cost to the complainant" is an important equity condition. | UNGPs<br>IJC (2019)<br>IPIECA (2012)<br>OHCHR (2024)<br>Equator Principles (2022)<br>CHRB's 2026 Methodology<br>ILO (2023) |

| Pillar | Question No. | Question | UNGP Effectiveness Criteria | References |
|---|---|---|---|---|
| | Q5.5 | Does the company provide training to staff responsible for handling grievances and supporting complainants? | This question addresses UNGP 31 criterion (a), *Legitimate,* because qualified and trained personnel are necessary for a legitimate mechanism.<br>Relevant training should include trauma-informed practice and human rights standards, cultural competency, confidentiality and other obligations. | UNGPs<br>AHRC (2021)<br>IPIECA (2012) on governance and personnel requirements<br>UNGCNA (2021)<br>Equator Principles (2022) |
| | Q5.6 | Do the relevant company functions participate in handling grievances, e.g., human resources, human rights, procurement, legal, finance, sustainability/ESG, operations? | This question relates to UNGP 31 criterion (a), *Legitimate,* and (c) *Predictable,* as clear organisational roles and responsibilities in handling grievances make outcomes more legitimate and predictable. | UNGPs<br>IPIECA (2012) on governance and personnel requirements<br>Rees (2011)<br>Equator Principles (2022)<br>ILO (2023) |
| **Remedy** | Q6.1 | Does the company's grievance mechanism have the capacity to provide a full range of remedies, including restitution, compensation, rehabilitation, satisfaction, guarantees of non-repetition, and referral to external legal or psychosocial services? | This question relates to UNGP 31 criterion (f) *Rights-compatible* and (d) *Equitable* – remedies must be consistent with internationally recognised human rights standards. | UNGPs<br>OHCHR (2024): Access to Remedy Guide<br>REDRESS (2024) on remedy types |
| | Q6.2 | Does the company consult complainants or their legitimate representatives on the satisfactoriness and adequacy of remedies provided? | This question relates to UNGP 31 criteria (d) *Equitable,* and (g) *Continuous learning.* Consultation with complainants requires systematically seeking and documenting feedback to ensure that remedies are proportionate to the severity of harm. | UNGPs<br>Harrison et al. (2023)<br>REDRESS (2024) on remedy types<br>ILO (2023) |
| | Q6.3 | Where the company is directly linked to a grievance (but did not cause or contribute to it), does it seek to use and build its leverage – including through collaboration with other buyers, investors, or civil society – to influence the responsible party to provide remedy? | This question relates to UNGP 31 criterion (f) *Rights-compatible*.<br>The question aligns with UNGP 13, 17 and 19 on leveraging its power to influence outcomes. | UNGPs<br>Walk Free (2024) |

| Pillar | Question No. | Question | UNGP Effectiveness Criteria | References |
|---|---|---|---|---|
| **Review** | Q7.1 | Does the company periodically and systematically review the effectiveness of its grievance mechanism, i.e., its design and operation, against defined key performance indicators (e.g., awareness, uptake rate, trust, resolution rate, complainant satisfaction, time from receipt to the completion of remedied grievances)? | This question relates to UNGP 31 criterion (g) *Continuous learning*.<br>The review should be planned with known frequency, methodology, and indicators. | UNGPs<br>IPIECA (2012) on review and monitoring<br>Hess (2008) on the development pillar of social reporting<br>UNGCNA (2021) |
| | Q7.2 | Does the company consult complainants/ affected stakeholders to review the effectiveness, including whether they know and trust the grievance mechanism? | This question is about consultation with stakeholders for operational review, relating to UNGP 31 criteria (g) *Continuous learning* and (h) *Engagement and dialogue*. | UNGPs<br>Labour Solutions (2026)<br>OHCHR (2024)<br>Harrison et al. (2023) |
| | Q7.3 | Does the company involve independent third parties (e.g., external auditors, civil society organisations, academic researchers) in reviewing the effectiveness of its grievance mechanism? | This item addresses independence of review – an important legitimacy safeguard, related to UNGP 31 criterion (a) *Legitimate,* as independent review enhances institutional legitimacy. | UNGPs<br>IPIECA (2012)<br>OHCHR (2021)<br>Harrison et al. (2023) on external review in MSIs. |
| | Q7.4 | Does the company conduct root-cause analysis of systemic issues identified through grievance data? | This question concerns the internal implementation of findings, in line with UNGP 31 criterion (g) *Continuous learning*. | UNGPs<br>IPIECA (2012)<br>OHCHR (2022)<br>Harrison et al. (2023) on external review in MSIs |
| | Q7.5 | Are findings from effectiveness reviews documented and translated into specific changes to mechanism design or operation? | This question concerns the internal implementation of findings, in line with UNGP 31 criterion (g) *Continuous learning*. | UNGPs<br>IPIECA (2012)<br>OHCHR (2021)<br>Harrison et al. (2023) on external review in MSIs<br>Equator Principles (2022) |
| | Q.7.6 | Does senior management oversee and is accountable for the grievance mechanism? | This question asks about designated executive accountability. Senior management accountability is a governance legitimacy requirement, in line with UNGP 31 criterion (a) – *Legitimate*. | UNGPs<br>Rees (2011) on upwards accountability structures<br>IPIECA (2012)<br>Equator Principles (2022) |

| Pillar | Question No. | Question | UNGP Effectiveness Criteria | References |
|---|---|---|---|---|
| **Reporting** | Q8.1 | Does the company report the total number of grievances received through its mechanisms in the reporting period? | This question relates to UNGP 31 criterion (e) *Transparent*. | UNGPs<br>Modern Slavery Act 2018 (Cth)<br>GRI 2-25 on grievance reporting<br>Pham, Cui & Ruthbah (2025)<br>Equator Principles (2022) |
| | Q8.2 | Of those, does the company report the number relating to modern slavery or other human rights issues? | This question relates to UNGP 31 criterion (e) *Transparent*. | UNGPs<br>Modern Slavery Act 2018 (Cth)<br>GRI 2-25 on grievance reporting<br>Pham, Cui & Ruthbah (2025)<br>Equator Principles (2022) |
| | Q8.3 | Does the company report the grievances it caused or contributed to? | This question relates to UNGP 31 criterion (e) *Transparent* and (g) *Continuous learning*. | UNGP<br>OHCHR (2024)<br>Walk Free (2024)<br>Equator Principles (2022) |
| | Q8.4 | Does the company disclose remediation outcomes and the proportion of grievances resolved to the complainant's satisfaction? | This question relates to UNGP 31 criterion (e) *Transparent* and (g) *Continuous learning*.<br>This question centres on the rights-holder's experience rather than the company's self-assessment of resolution. | UNGP<br>OHCHR (2024)<br>Walk Free (2024)<br>Equator Principles (2022) |
| | Q8.5 | Does the company publicly report the average or median time taken to complete remedied grievances? | This question relates to UNGP 31 criteria (e) *Transparent* and (g) *Continuous learning*. | UNGP<br>OHCHR (2024)<br>Walk Free (2024)<br>Equator Principles (2022) |
| | Q8.6 | Does the company disclose anonymised case examples of grievances received or remedied? | This question relates to UNGP 31 criteria (e) *Transparent* and (a) *Legitimate,* as case examples build stakeholder confidence. | UNGPs<br>OHCHR (2024)<br>IFC (2009) |
| | Q8.7 | Does the company have a formal process for reporting grievance mechanism performance to the board or a relevant board committee on a regular basis? | This question relates to UNGP 31 criteria (a) *Legitimate* and (e) *Transparent.*<br>This question is about board-level accountability. | UNGPs<br>IPIECA (2012)<br>Rees (2011) on upwards accountability. |
| | Q8.8 | Does the company adopt any internationally recognised reporting standards/ frameworks for reporting grievances and remediation? | This question relates to UNGP 31 criteria (a) *Legitimate* and (e) *Transparent.*<br>GRI Standards (GRI 2-25, GRI 413); UNGP Reporting Framework; ISSB/IFRS S1; Modern Slavery Act 2018 (Cth); EU CSRD/ESRS; ISO 26000; other | UNGPs<br>UNGP Reporting Framework<br>GRI 2-25<br>Modern Slavery Act 2018 (Cth)<br>EU CSRD<br>Pham, Cui and Ruthbah (2025) |

# APPENDIX 2

| Pillar | Question ID | Question | Current Practice | Comments | Evidence | In the MS Statement | Evidence |
|---|---|---|---|---|---|---|---|
| **Representation** | Q1.1 | Does the company explicitly reference international human rights standards (e.g., UNGPs, OECD Guidelines, ILO Conventions, or other equivalent international human rights frameworks) as the normative basis for its grievance mechanism design? | YES | Referenced in the university process and procedure for responding to reports | MS Statement 2025, p. 4 | YES | MS Statement 2025, p. 4 |
| | Q1.2 | Does the company consult affected stakeholders or their legitimate representatives in grievance mechanism design? | YES | Human Rights Due Diligence Toolkit, p. 2, 5 & 11 | Human Rights Due Diligence Toolkit, p. 2, 5 & 11 | YES | MS Statement p. 4, 35 |
| **Respect** | Q.2.1 | Does the mechanism accept grievances across all human rights issues, or is it limited to modern slavery? | YES | MS Grievance Mechanism developed and rated against the UNGP standards | Modern Slavery Grievance Mechanism Review Overview 2025_V2 | YES | MS Statement p. 39 |
| | Q2.2 | Is the company's grievance mechanism available in multiple languages of potentially affected stakeholders? | NO | USYD website is exclusively in English | | NO | |
| | Q2.3 | Does the company's grievance mechanism ensure confidentiality? | YES | Stated on USYD Modern Slavery website the grievance mechanism reporting process is confidential | https://www.sydney.edu.au/about-us/vision-and-values/modern-slavery.html | YES | MS Statement - Support Services page |
| | Q2.4 | Does the mechanism include explicit anti-retaliation protections to avoid reprisal? | YES | Grievance mechanism is confidential to avoid reprisals against the reporter. Our grievance mechanism protocol is to advertise emergency services if the reporter is in immediate danger. | MS Reports Procedure 2026 p. 3-4 | YES | MS Statement - Support Services page |
| | Q2.5 | Does the company incorporate trauma-informed principles in the design and operation of its grievance mechanism? | YES | | Draft Modern Slavery Policy 2026, p. 10 | YES | MS Statement p. 16 |

| Pillar | Question ID | Question | Current Practice | Comments | Evidence | In the MS Statement | Evidence |
|---|---|---|---|---|---|---|---|
| **Relationships** | Q3.1 | Does the mechanism have documented referral protocols to law enforcement, labour authorities, and support services for cases involving suspected criminal conduct or serious harm? | YES | The Modern Slavery Incident Reporting Form asks if there are any urgent safety concerns. If there are, then the current process is to follow the critical incident procedure, which includes contacting emergency services. Contact information to 000 and the AFP are also on the reporting form and website. | MS Reports Procedure 2026 p. 3-4 | YES | The contact information for emergency services and the AFP is listed on the MS Statement Support Services page. This includes instructions to contact police if the reporter is in immediate danger. MS Statement 2025 Support Services page |
| | Q3.2 | If the company reports a grievance to police, do they notify and consult with the complainant or their legitimate representatives? | YES | The reporter may be notified, but the current protocol is that if the reporter is in immediate danger, USYD does not require the reporter's consent before notifying emergency services; however, once this has been done, the complainant will be notified. In non-life-threatening scenarios, we would first seek the complainant's consent before engaging the police. | MS Reports Procedure 2026 p. 4 | NO | We do not disclose this level of detail in our statement. |
| | Q3.3 | Does the company belong to collaborative grievance mechanisms if available, e.g., industry, multistakeholder? | NO | | | NO | |
| | Q3.4 | Does the company explicitly commit to cooperating in other grievance mechanisms, e.g., courts, tribunals, OECD NCPs, UN Special Procedures? | YES | USYD's approach to our grievance mechanism is informed by the UN Guiding Principles on Business and Human Rights (UNGPs) | MS Statement 2025, p. 4 | YES | MS Statement 2025, p. 4 |

| Pillar | Question ID | Question | Current Practice | Comments | Evidence | In the MS Statement | Evidence |
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| | Q3.5 | Does the company require its suppliers to have grievance mechanisms? | YES | It's a contract requirement that suppliers either have a grievance mechanism in place or share the University's grievance mechanism with its staff | Suppliers Assessment Questionnaire which can be provided | NO | We do not disclose this level of detail in our statement. |
| **Receipt** | Q4.1 | Does the company proactively communicate the grievance mechanism and complaint process in ways that are accessible to affected stakeholders? | YES | USYD website 'Make a report of Modern Slavery' explains the grievance mechanism process and allows affected stakeholders to submit a complaint | Make a report of modern slavery - https://www.sydney.edu.au/about-us/vision-and-values/modern-slavery/report-modern-slavery.html | YES | MS Statement - Support Services page |
| | Q4.2 | Does the company provide multiple channels for reporting a grievance, e.g., in-person, phone, online, third-party operated hotlines or through different business functions? | NO | The primary method advertised to report a grievance is to submit a form through the online Modern Slavery Incident report system. The MSU does also advertise their email however this is not the primary method to submit a grievance. | https://www.sydney.edu.au/about-us/vision-and-values/modern-slavery/report-modern-slavery.html | NO | Links to our modern slavery form are advertised on other parts of the University website such as the students page - we however do not include this level of detail in the statement |
| | Q4.3 | Does the company support affected stakeholders submitting grievances so they can participate in the grievance process in a fair and informed way, e.g., technical, financial, legal, linguistic, and psychosocial support? | YES | The university will require information from the reporter when assessing their case but does not offer a means to directly participate in the assessment of their case. Mental health and counselling support services are offered to the reporter as part of the grievance mechanism. | MS Reports Response Procedure 2026 | YES | MS Statement - Support Services page |
| | Q4.4 | Does the mechanism explicitly permit submission by legitimate representatives (including trade unions, worker representatives, civil society organisations, and | YES | The university allows others who have witnessed, knowledge of or are concerned about modern slavery to submit an incident form online on behalf of that person. | Modern Slavery Incident Reporting Form, Q1. | NO | Who may report cases of modern slavery is not communicated in |

| Pillar | Question ID | Question | Current Practice | Comments | Evidence | In the MS Statement | Evidence |
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| | | legal counsel) acting on behalf of complainants? | | | | | the 2025 MS Statement. |
| | Q4.5 | Does the company timely acknowledge receipt of grievances? | YES | The university will acknowledge receipt immediately after the report has been lodged, followed up by a full response within 3 business days. | https://www.sydney.edu.au/about-us/vision-and-values/modern-slavery/report-modern-slavery.html | NO | We do not disclose this level of detail in our statement. |
| **Response** | Q5.1 | Does the mechanism publish clear, indicative timeframes for each stage, the range of possible outcomes, and how outcomes will be communicated? | YES | Website outlines reporting requirements and that the MSU will respond to reports within 3 business days to confirm receipt, however no other guarantees are made regarding possible outcomes or indicative timelines. | https://www.sydney.edu.au/about-us/vision-and-values/modern-slavery/report-modern-slavery.html | NO | We do not disclose this level of detail in our statement. |
| | Q5.2 | Does the company assess whether it potentially caused, contributed to or is directly linked to the grievance in line with the UNGPs? | YES | Human Rights Due Diligence Toolkit | Human Rights Due Diligence Toolkit, p. 9 | YES | MS Statement p. 39 |
| | Q5.3 | Does the company engage in structured dialogue with complainants and/or their legitimate representatives during the grievance process? | YES | Remedy will be provided if the university has caused or engaged in modern slavery. Unsure the extent to which the university engages in dialogue with reporters during this process. | Human Rights Due Diligence Toolkit p. 9 | YES | MS Statement p. 39 |
| | Q5.4 | If the company and the complainant cannot agree on a resolution, can the grievance be escalated to independent third-party mediation at no cost to the complainant? | YES | Reporters may submit to the AFP or the OASC if they do not want to submit to the University or feel dissatisfied with the grievance mechanism outcome. | 2025 MSS Support Services page | YES | 2025 MSS Support Services page |
| | Q5.5 | Does the company provide training to staff responsible for handling grievances and supporting complainants? | YES | Staff complete mandatory Modern slavery awareness modules and other grievance mechanism training. | Human Rights Due Diligence Toolkit p. 10-11 | YES | MS Statement p. 8, 10, 16 |

| Pillar | Question ID | Question | Current Practice | Comments | Evidence | In the MS Statement | Evidence |
|---|---|---|---|---|---|---|---|
| | Q5.6 | Do the relevant company functions participate in handling grievances, e.g., human resources, human rights, procurement, legal, finance, sustainability/ESG, operations? | YES | HR, Internal Audit and Procurement may be contacted and given details of the case with reporter permission. | MS Reports Response Procedure 2026 p. 4 | YES | MS Statement p. 40-41. Summary of 2025 reports demonstrates how HR and Procurement may be involved in handing grievance reports. |
| **Remedy** | Q6.1 | Does the company's grievance mechanism have the capacity to provide a full range of remedies, including restitution, compensation, rehabilitation, satisfaction, guarantees of non-repetition, and referral to external legal or psychosocial services? | YES | Where USYD has caused or contributed to modern slavery, remediation may include support to take legal action and financial compensation. Counselling services are always available to USYD students. | Human Rights Due Diligence Toolkit, p. 9 | YES | MS Statement p. 39 |
| | Q6.2 | Does the company consult complainants or their legitimate representatives on the satisfactoriness and adequacy of remedies provided? | NO | We do not engage with complainants once they've been referred to a specialist service (often an external service) | | NO | |
| | Q6.3 | Where the company is directly linked to a grievance (but did not cause or contribute to it), does it seek to use and build its leverage — including through collaboration with other buyers, investors, or civil society — to influence the responsible party to provide remedy? | YES | USYD continues to facilitate opportunities to leverage the University's expertise through collaborating with academics, government, business and people with lived experience. This informs our approach to remedying grievances. | MS Statement 2025 p. 11 | YES | MS Statement 2025 p. 11 |
| **Review** | Q7.1 | Does the company periodically and systematically review the effectiveness of its grievance mechanism, i.e., its design and operation, against defined key performance indicators (e.g., awareness, uptake rate, trust, resolution rate, complainant satisfaction, time from receipt to | YES | Initiated review of grievance mechanism in 2025 | Internal review | NO | We do not disclose this level of detail in our statement. |

| Pillar | Question ID | Question | Current Practice | Comments | Evidence | In the MS Statement | Evidence |
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| | | the completion of remedied grievances)? | | | | | |
| | Q7.2 | Does the company consult complainants/ affected stakeholders to review the effectiveness, including whether they know and trust the grievance mechanism? | YES | Reporters and affected stakeholders consulted as part of 2025 review of grievance mechanism | 202601 Feedback collation and actions | NO | We do not disclose this level of detail in our statement. |
| | Q7.3 | Does the company involve independent third parties (e.g., external auditors, civil society organisations, academic researchers) in reviewing the effectiveness of its grievance mechanism? | YES | This has occurred once (in 2025) where people with lived experience, students and civil society organisations were asked to provide feedback on the GM | See Grievance and Remedy 2025 MS statement section | YES | See Grievance and Remedy 2025 MS statement section |
| | Q7.4 | Does the company conduct root-cause analysis of systemic issues identified through grievance data? | YES | Where a report indicates systemic or structural issues of concern, the matter is referred to the Internal Audit team for review and potential investigation | Grievance Mechanism Framework | NO | We do not disclose this level of detail in our statement. |
| | Q7.5 | Are findings from effectiveness reviews documented and translated into specific changes to mechanism design or operation? | YES | Documented and used to refine the language, structure of the report form itself and the Grievance Mechanism Response Guidelines | Internal review | NO | We do not disclose this level of detail in our statement. |
| | Q7.6 | Does senior management oversee and is accountable for the grievance mechanism? | YES | Vice President of Operations is accountable | | NO | We do not disclose this level of detail in our statement. |
| **Reporting** | Q8.1 | (a) Does the company report the total number of grievances received through its mechanisms in the reporting period? | YES | 38 incidents reported in 2025 | MS Statement 2025 p. 40 | YES | MS Statement 2025 p. 40 |
| | Q8.2 | (b) Of those, does the company report the number relating to modern slavery or other human rights issues? | YES | All 38 reports had potential indicators of modern slavery or exploitation | MS Statement 2025 p. 40 | YES | MS Statement 2025 p. 40 |
| | Q8.3 | Does the company report the grievances it caused or contributed to? | NO | | | NO | |

| Pillar | Question ID | Question | Current Practice | Comments | Evidence | In the MS Statement | Evidence |
|---|---|---|---|---|---|---|---|
| | Q8.4 | Does the company disclose remediation outcomes and the proportion of grievances resolved to the complainant's satisfaction? | YES | Undertake to prevent harm, counselling, legal support, compensation | MS Statement 2025, p. 40-41 | YES | MS Statement 2025, p. 40-41 |
| | Q8.5 | Does the company publicly report the average or median time taken to complete remedied grievances? | NO | We do not disclose this but we do track this internally | | NO | |
| | Q8.6 | Does the company disclose anonymised case examples of grievances received or remedied? | YES | We provide a summary of the type of cases we have received and whether they met the modern slavery definition threshold as well as the case outcome | See Grievance and Remedy 2025 MS statement section | YES | See Grievance and Remedy 2025 MS statement section |
| | Q8.7 | Does the company have a formal process for reporting grievance mechanism performance to the board or a relevant board committee on a regular basis? | YES | Yearly reporting as part of MS statement approval process, as well as quarterly updates through the central complaints management team | | NO | We do not disclose this level of detail in our statement. |
| | Q8.8 | Does the company adopt any internationally recognised reporting standards/ frameworks for reporting grievances and remediation? | YES | USYD uses the UN Guiding Principles on Business and Human Rights (UNGPs). | MS Statement 2025, p. 4 | YES | MS Statement 2025 p. 4 |

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