

Modern Slavery Risks in Construction: An Overview

Many of your procurements in the construction sector will contain both labour and materials. You will have to take both sets of risks into account in your due diligence and contract management.

How to Use this Guide

1. Identify services and materials in your procurement using the table below.
2. The highest selected 'Inherent Modern Slavery Risk Level' determines your procurement's risk level.
3. Access relevant risk assessment summaries via the Risk Assessment Column links.
4. Review the full assessment in the Inherent Risk Identification Tool.

Risk Assessment	Description	Inherent Modern Slavery Risk Level	Part of my Procurement (Yes / No)
RA101	Construction: Qualified Trades	Low	
RA102	Construction: Unqualified Trades	Moderate	
RA115	Building Materials: Concrete	Low	
RA116	Building Materials: other construction materials comprising gypsum, wood, steel, aluminium, flooring, and bricks	High	
RA117	Building Materials: Timber and Wood	High	
RA118	Building Materials: Mined and quarried earth and stone including granite	High	
RA119	Building Materials: Asphalt, Bitumen and Aggregates	Moderate	
RA120	Building Materials: Electrical and Lighting Supplies	High	
RA121	Building Materials: Plumbing and Fixtures	High	
RA122	Building Materials: Steel and Aluminium	High	
RA135	Building Materials: Insulation and Specialised Materials	Low	
RA143	Building Materials: HVAC Equipment	High	
RA144	Building Materials: Sealants and Adhesives	High	
RA127	Renewable Energy	High	
RA128	Oil and Gas	Moderate	
RA010	Security Services	High	
RA012	Facilities Management: Cleaning Services	High	

Based on the selections above this procurement has a risk level of:

Select Yes or No from the dropdowns above to calculate the risk level.

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Modern Slavery Risks – Local Trades (Skilled and Unskilled Labour)

Modern slavery risks for local trades and labourers (both skilled and unskilled) in the construction industry vary. Migrant workers face a higher risk, with the level of risk influenced by the skills, qualifications, or licences required to perform work.

Skilled and unskilled work is defined by the following criteria:

Skilled (Qualified) Trades

Tradespeople that require a license or certificate issued by NSW Fair Trading or other government department such as a license to operate heavy machinery to perform their work. See for example:

www.fairtrading.nsw.gov.au/trades-and-businesses/licensing-and-qualifications
www.safework.nsw.gov.au/licences-and-registrations/licences/high-risk-work-licences

Skilled (Unqualified) Trades

Construction trades or general labouring that doesn't require a license or certificate issued by NSW Fair Trading or other government department such as a license to operate heavy machinery. Any type of construction work that would be considered a low barrier to entry.

See the risk assessments in the following sections for more detailed information.

Modern Slavery Risks – Materials

Modern slavery risks can exist at various stages of the manufacturing or construction materials supply chain. The types and levels of risk will vary depending on the upstream inputs and the composition of these materials. Products wholly produced in Australia may have lower levels of risk.

To be considered wholly produced in Australia, the entire value chain must be based in Australia, including:

- The extraction of raw materials
- The processing, refining, or smelting of raw materials
- The manufacture of components or subcomponents
- The manufacture of finished products

See the risk assessments in the following sections for more detailed information.

This GRS Resource should be read, and is designed to be used, in conjunction with the IRIT Tool (Version 2.0, May 2025) and the Commissioner's Guidance on Reasonable Steps ('Guidance' or 'GRS').

Risk Assessment Summary – Construction: Qualified Trades

RA101	Construction: Qualified Trades			
Inherent Modern Slavery Risk Level	Authoritative Determinations (Product)	Vulnerable Populations	Supply Chain Model	Regulatory Context
Low		Yes		

Nature of Risk

[General] Tradespeople and engineers who require a minimum standard of training or education to obtain a licence or certificate issued by an Australian government department or agency to perform their trade are considered highly skilled, and therefore relatively less likely to be subject to exploitation. However, inherent modern slavery risks may exist for any skilled (including workers part of a skilled migration program) and unskilled temporary migrant workers that form part of this service.

[Vulnerable Populations] Skilled and unskilled temporary migrant workers in Australia's construction industry, whether employed legally or not, face heightened vulnerability due to limited knowledge of Australian workplace regulations, restricted access to support, language barriers, and social isolation. Victims of human trafficking, including migrants, can be vulnerable to slavery-like practices in the construction sector.

Relevant IRIT Product Categories

WofG0114	Construction	Trades in Construction	Bricklaying
WofG0115	Construction	Trades in Construction	Carpenters and joiners
WofG0117	Construction	Trades in Construction	Concreting
WofG0118	Construction	Trades in Construction	Fencing
WofG0119	Construction	Trades in Construction	Landscaping
WofG0120	Construction	Trades in Construction	Metal Work and Structural Steelwork
WofG0121	Construction	Trades in Construction	Painting and Coating
WofG0122	Construction	Trades in Construction	Residential building works
WofG0123	Construction	Trades in Construction	Roof Sheeting and Roof Plumbing
WofG0124	Construction	Trades in Construction	Tiling

Navigate to the category in the IRIT V2.0 Sheet to review the full risk assessment.

Risk Assessment Summary – Construction: Unqualified Trades

RA102	Construction: Unqualified Trades			
Inherent Modern Slavery Risk Level	Authoritative Determinations (Product)	Vulnerable Populations	Supply Chain Model	Regulatory Context
Moderate		Yes	Yes	

Nature of Risk

[General] Inherent modern slavery risks may exist for any skilled (including as part of a skilled migration program) and unskilled temporary migrant workers that form part of this service. Complex subcontracting may also expose licensed and unlicensed migrant workers to exploitation.

[Vulnerable Populations] Skilled and unskilled temporary migrant workers in Australia's construction industry, whether employed legally or not, face heightened vulnerability due to limited knowledge of Australian workplace regulations, restricted access to support, language barriers, and social isolation. Victims of human trafficking, including migrants, can be vulnerable to slavery-like practices in the construction sector.

[Supply Chain Model] Subcontracting and cash-in-hand employment make migrant workers susceptible to exploitation including underpayment with issues such as labour hire, sham and pyramid subcontracting reducing transparency. Complex subcontracting arrangements can make it difficult for workers to know which company they are working for.

Relevant IRIT Product Categories

WofG0003	Construction	Building Construction	Demolition
WofG0113	Construction	Trades in Construction	Asphalting
WofG0116	Construction	Trades in Construction	Cement Rendering
WofG0207	Facilities and Buildings Management	Speciality Building Maintenance and Repairs	Handyman
Navigate to the category in the IRIT V2.0 Sheet to review the full risk assessment.			

Risk Assessment Summary – Building Materials: Concrete

RA115	Building Materials: Concrete			
Inherent Modern Slavery Risk Level	Authoritative Determinations (Product)	Vulnerable Populations	Supply Chain Model	Regulatory Context
Low		Yes		

Nature of Risk

[General] Modern slavery risks exist in the raw material inputs of concrete when they are sourced from outside Australia. This includes sand and limestone which are required for producing clinker.

[Vulnerable Populations] Child labour in mining and quarrying is prevalent in several regions with children working under hazardous conditions. Examples include sand mining in Kenya, Nigeria, and Uganda, as well as limestone mining in Egypt and Paraguay driven largely by economic hardship.

Relevant IRIT Product Categories

WofG0031	Construction	Construction Materials	Concrete
Navigate to the category in the IRIT V2.0 Sheet to review the full risk assessment.			

Risk Assessment Summary – Building Materials: Other Construction Materials (gypsum, wood, steel, aluminium, flooring, and bricks)

RA116	Building Materials: other construction materials			
Inherent Modern Slavery Risk Level	Authoritative Determinations (Product)	Vulnerable Populations	Supply Chain Model	Regulatory Context
High	Yes	Yes	Yes	Yes

Nature of Risk

[General] The types of products in this category vary broadly. The inherent risk of products procured under this category will depend on the nature and value chain of the product being produced. The risks identified in this assessment relate to products, their raw material inputs, and subcomponents that are not wholly produced in Australia.

[Authoritative Determinations] Child labour, forced labour, and bonded labour have been identified in 20 countries within the brick manufacturing industry. These cases include forced labour through military mandates and cycles of intergenerational debt bondage. Forced labour has also been identified in the timber industry in several countries.

[Vulnerable Populations] The worst forms of child labour, forced labour, and bonded labour are common in industries like brick manufacturing, timber, gypsum mining, and carpet weaving. Forced labour through labour transfer programmes has also been documented in the Xinjiang region during the refining and production of polyvinyl chloride (PVC), steel and aluminium products. Vulnerable groups, such as children (including trafficked children), migrants, ethnic minority groups and impoverished families are most affected. Workers face dangerous conditions, debt bondage, underpayment and / or payment of piece rates.

[Supply Chain Model] The construction industry's supply chains are complex and opaque, making it difficult to trace the origins of building materials and ensure ethical labour and sourcing practices. Illegally harvested timber can pass through multiple countries; PVC resin produced in Xinjiang is shipped to southern China, where its origin is hard to trace; and in the steel and aluminium industries, raw materials are sourced from regions with little oversight, processed in multiple countries, and used in global construction. In aluminium, steel, and polyvinyl chloride (PVC) production, workers are recruited through state-sponsored forced labour schemes.

[Regulatory Context] Inconsistent enforcement and limited oversight in implementing labour laws and policies create inherent risks of modern slavery. Although bonded labour is illegal in most countries where materials in this category are sourced, including India, laws are often ineffectively enforced. Enforcement gaps result from poor implementation, corruption, delays in remediation, disparities in enforcement across regions, and the lack of viable alternative employment opportunities.

Relevant IRIIT Product Categories

WofG003	Construction	Construction Materials	Other Building Material
Navigate to the category in the IRIIT V2.0 Sheet to review the full risk assessment.			

Risk Assessment Summary – Building Materials: Timber and Wood

RA117	Building Materials: Timber and Wood			
Inherent Modern Slavery Risk Level	Authoritative Determinations (Product)	Vulnerable Populations	Supply Chain Model	Regulatory Context
High	Yes	Yes	Yes	Yes

Nature of Risk

[General] The forestry and timber industry play a crucial role in global supply chains, providing essential materials for construction, furniture, and paper production. However, it is often associated with labour exploitation fostered by complex supply chain arrangements, particularly in regions with weak governance and oversight. The risk in this category relates to timber and wood products sourced from forestry operations outside Australia

[Authoritative Determinations] Reports indicate forced labour in Russia's timber industry, including approximately 2,000 North Koreans sent by their government, who work 12–18 hours daily under growing debts from bribes. Isolated in remote logging camps, workers remit 80% of their wages to the North Korean government, leaving them with only \$30–\$50 per month. Despite Russia's 2017 pledge to stop issuing visas to North Korean workers under UN Resolution 2397, concerns persist. In Vietnam, evidence shows children aged 5–17 engage in timber production, with 58,079 involved in tasks like logging and loading, 6,428 working over 42 hours weekly, and 89% exposed to hazardous conditions, as per Vietnam's 2012 National Child Labour Survey.

[Vulnerable Populations] In the upstream timber and forestry sector, vulnerable populations include migrant workers, informal labourers, and indigenous communities who often face exploitation due to limited protections and isolated work environments. Children are also at risk, with many engaged in hazardous tasks such as logging and carrying heavy loads, particularly in regions like Vietnam and Brazil.

[Supply Chain Model] The supply chain of this sector is characterised by multiple intermediaries, making it difficult to trace the origins of wood and ensure ethical practices. Key stages such as logging, transportation, and initial processing often involve informal labour and exploitative conditions, particularly in regions with weak governance and high demand for timber products.

[Regulatory Context] Regulatory frameworks such as the EU Timber Regulation aim to address illegal logging and forced labour but face challenges in enforcement and consistency across jurisdictions. Gaps between legislation and practical implementation, coupled with insufficient oversight in remote areas, allow exploitative practices to persist in many regions.

Relevant IRT Product Categories

WofG0034	Construction	Construction Materials	Fencing Materials
WofG044	Construction	Construction Materials	Timber and Wood

Navigate to the category in the IRT V2.0 Sheet to review the full risk assessment.

Risk Assessment Summary – Building Materials: Mined, Quarried Earth, and Stone, including granite

RA118	Building Materials: Mined, Quarried Earth, and Stone			
Inherent Modern Slavery Risk Level	Authoritative Determinations (Product)	Vulnerable Populations	Supply Chain Model	Regulatory Context
High	Yes	Yes	Yes	Yes

Nature of Risk

[General] The types of products in this category vary broadly. The inherent risk of products procured under this category will depend on the nature and value chain of the product being produced. The risk identified in this assessment relates to products, their raw material inputs, and subcomponents that are not wholly produced in Australia.

[Authoritative Determinations] Child labour (including forced labour and familial work) and forced labour have been identified in various mined and quarried stones such as gravel, granite, sandstone, and limestone across various countries.

[Vulnerable Populations] Child labour, forced child labour, and forced labour are prevalent in the mining and quarrying of materials such as granite, sandstone, gravel, and limestone, particularly in lower-income countries. In Rajasthan, India, migrants (including women, children, and lower-caste workers) face hazardous conditions and exploitation while extracting and processing sandstone for global supply chains.

[Supply Chain Model] In India's sandstone quarries, marginalised interstate migrants are often lured into bonded labour through agents and debt, working without contracts in dangerous conditions for low pay. Quarry owners exploit undocumented debts, which grow through high interest and hidden costs, binding entire families, including children, who may inherit or even be sold to settle these debts.

[Regulatory Context] Although bonded labour is illegal in most countries where materials in this category are sourced, including India, laws are often ineffectively enforced. Enforcement gaps result from poor implementation, corruption, delays in remediation, disparities in enforcement across regions, and the lack of viable alternative employment opportunities.

Relevant IRIT Product Categories

WofG0040	Construction	Construction Materials	Quarry, Earth and Stone
Navigate to the category in the IRIT V2.0 Sheet to review the full risk assessment.			

Risk Assessment Summary – Building Materials: Asphalt, Bitumen, and Aggregates

RA119	Building Materials: Asphalt, Bitumen and Aggregates			
Inherent Modern Slavery Risk Level	Authoritative Determinations (Product)	Vulnerable Populations	Supply Chain Model	Regulatory Context
Moderate		Yes	Yes	

Nature of Risk

[General] The risk in this category relates to the extraction, processing, and transport of crude oil and petroleum bitumen inputs.

[Vulnerable Populations] The global resources industry heavily relies on migrant and low-skilled workers, who are vulnerable to exploitation due to language barriers, weak legal protections, and economic hardship. Workers in remote or conflict-prone regions often face overcrowded living conditions, underpayment, and coercion into excessive work hours. Additionally, migrant workers involved in Australian offshore oil and gas shipping activities may be exploited through visa programs and vessel licensing schemes.

[Supply Chain Model] Labour hire practices, including outsourcing and short-term contracts, are a key area of risk in the oil and gas industry. These practices can obscure accountability and increase exploitation risks. Maritime shipping is a further area of supply chain risk, with seafarers often facing forced labour, wage withholding, harsh working conditions and geographic isolation.

Relevant IRIT Product Categories

WofG0030	Construction	Construction Materials	Asphalt, Bitumen and Aggregates
Navigate to the category in the IRIT V2.0 Sheet to review the full risk assessment.			

Risk Assessment Summary – Building Materials: Electrical and Lighting Supplies

RA120	Building Materials: Electrical and Lighting Supplies			
Inherent Modern Slavery Risk Level	Authoritative Determinations (Product)	Vulnerable Populations	Supply Chain Model	Regulatory Context
High		Yes	Yes	Yes

Nature of Risk

[General] There are risks of child and forced labour in multiple upstream supply chains involving raw materials and subcomponent inputs for lighting, electrical, and other products used in building, construction, and maintenance.

[Vulnerable Populations] The mining and processing of raw materials, as well as the production of subcomponents required for electrical and lighting products are associated with practices such as child labour, forced labour, and state-sponsored labour transfer programmes. Materials at risk include aluminium, brass, ceramics, zinc, polyvinyl chloride (PVC), rubber, glass, copper, and silver.

[Supply Chain Model] Small-scale and artisanal mines are involved in sourcing copper and other raw materials in some countries. Raw material inputs are transferred from their origin and transformed into various products, making their provenance and associated risks difficult to trace.

[Regulatory Context] State sponsored forced labour programmes are implicated in the production of aluminium, copper, and PVC. Government restrictions further complicate efforts to audit worker conditions and assess labour related risks.

Relevant IRIT Product Categories

WofG0032	Construction	Construction Materials	Electrical and Lighting Supplies
Navigate to the category in the IRIT V2.0 Sheet to review the full risk assessment.			

Risk Assessment Summary – Building Materials: Plumbing and Fixtures

RA121	Building Materials: Plumbing and Fixtures			
Inherent Modern Slavery Risk Level	Authoritative Determinations (Product)	Vulnerable Populations	Supply Chain Model	Regulatory Context
High		Yes	Yes	Yes

Nature of Risk

[General] There are risks of child and forced labour in multiple upstream supply chains involving raw materials and subcomponent inputs for plumbing products used in building, construction, and maintenance.

[Vulnerable Populations] The mining and processing of raw materials, as well as the production of subcomponents required for plumbing products are associated with practices such as child labour, forced labour, and state-sponsored labour transfer programmes. Materials at risk include aluminium, brass, ceramics, zinc, polyvinyl chloride (PVC), rubber, and copper.

[Supply Chain Model] Small-scale and artisanal mines are involved in sourcing copper and other raw materials in some countries. Raw material inputs are transferred from their origin and transformed into various products, making their provenance and associated risks difficult to trace.

[Regulatory Context] State sponsored forced labour programmes are implicated in the production of aluminium, copper, and PVC. Government restrictions further complicate efforts to audit worker conditions and assess labour related risks.

Relevant IRIT Product Categories

WofG0039	Construction	Construction Materials	Plumbing and Fixtures
Navigate to the category in the IRIT V2.0 Sheet to review the full risk assessment.			

Risk Assessment Summary – Building Materials: Steel and Aluminium

RA122	Building Materials: Steel and Aluminium			
Inherent Modern Slavery Risk Level	Authoritative Determinations (Product)	Vulnerable Populations	Supply Chain Model	Regulatory Context
High		Yes	Yes	Yes

Nature of Risk

[General] Steel and aluminium, along with subcomponents made from them, are widely used in the construction industry. However, they may have been produced using child labour, forced labour, or practices amounting to modern slavery.

[Authoritative Determinations] Forced labour of adult Uyghurs, ethnic Kazakhs, and other Muslim minorities from the XUAR has been reported in the Chinese aluminium and steel production industry. A Chinese manufacturer of rebar, hot-rolled coils, and medium and thick steel plates has been subject to import sanctions in the US in connection with these reports.

[Vulnerable Populations] Migrants and minorities are disproportionately affected by forced labour in upstream activities of the steel and aluminium sectors, particularly in mining operations for iron ore and bauxite. These workers often face exploitative practices such as debt bondage and coercion, driven by economic necessity and inadequate labour protections in resource-rich regions. Steel and aluminium smelted and processed in the Xinjiang region has been identified to be made with forced labour of ethnic minorities.

[Supply Chain Model] The upstream supply chain for the steel and aluminium sectors involves complex, fragmented operations, particularly in the extraction of raw materials like iron ore and bauxite. This fragmentation, coupled with reliance on informal labour and subcontracting in mining operations, creates significant risks for forced labour and obscures accountability within these supply chains. The smelting and processing of steel and aluminium may contain labour from workers recruited through government sponsored forced labour programs.

[Regulatory Context] The regulatory context for the upstream steel and aluminium sectors reveals significant enforcement gaps in international labour standards, particularly in mining operations for raw materials. Despite the existence of frameworks like ILO Conventions, weak implementation, insufficient inspections, and ineffective penalties in resource-rich countries allow forced labour to persist in these industries.

Relevant IRIT Product Categories

WofG0042	Construction	Construction Materials	Steel and Construction Materials
Navigate to the category in the IRIT V2.0 Sheet to review the full risk assessment.			

Risk Assessment Summary – Building Materials: Insulation and Specialised Materials

RA135	Building Materials: Insulation and Specialised Materials			
Inherent Modern Slavery Risk Level	Authoritative Determinations (Product)	Vulnerable Populations	Supply Chain Model	Regulatory Context
Low		Yes		

Nature of Risk

[General] The raw material inputs required for products this category may have been produced using child or forced labour. This risk identified in this assessment relates to raw material inputs that are not wholly produced in Australia or products not made using 100% recycled materials.

[Vulnerable Populations] The raw material inputs required to produce glass-based / fibreglass and aluminium building insulation may involve forced and child labour. Sand mining in several countries has been linked to child labour, as has the mining of limestone. US authorities have imposed forced labour import restrictions on a Chinese manufacturer of products including soda ash, used in fibreglass insulation, due to the use of forced prison labour. Aluminium smelted and processed in the Xinjiang region has been identified as being made with the forced labour of ethnic minorities. This has been linked to downstream aluminium-based products such as foil and sheet.

Relevant IRIT Product Categories

WofG0037	Construction	Construction Materials	Insulation and Specialised Materials
Navigate to the category in the IRIT V2.0 Sheet to review the full risk assessment.			

Risk Assessment Summary – Building Materials: HVAC Equipment

RA143	Building Materials: HVAC Equipment			
Inherent Modern Slavery Risk Level	Authoritative Determinations (Product)	Vulnerable Populations	Supply Chain Model	Regulatory Context
High		Yes	Yes	Yes

Nature of Risk

[General] There are risks of child and forced labour in multiple upstream supply chains involving raw materials and subcomponent inputs for HVAC cooling and heating equipment and associated electrical and plumbing requirements.

[Vulnerable Populations] The mining and processing of raw materials, as well as the production of subcomponents required for HVAC equipment are associated with practices such as child labour, forced labour, and state-sponsored labour transfer programmes. Materials at risk include aluminium, brass, ceramics, zinc, polyvinyl chloride (PVC), rubber, glass, copper, and silver. Additionally, modern slavery like practices have been reported in the Malaysia-based manufacturing of plastic casings for a major HVAC manufacturer.

[Supply Chain Model] Small-scale and artisanal mines are involved in sourcing copper and other raw materials in some countries. Raw material inputs are transferred from their origin and transformed into various products, making their provenance and associated risks difficult to trace.

[Regulatory Context] State sponsored forced labour programmes are implicated in the production of aluminium, copper, and PVC. Government restrictions further complicate efforts to audit worker conditions and assess labour related risks.

Relevant IRT Product Categories

WofG0036	Construction	Construction Materials	HVAC Parts
Navigate to the category in the IRT V2.0 Sheet to review the full risk assessment.			

Risk Assessment Summary – Building Materials: Sealants and Adhesives

RA144	Building Materials: Sealants and Adhesives			
Inherent Modern Slavery Risk Level	Authoritative Determinations (Product)	Vulnerable Populations	Supply Chain Model	Regulatory Context
High		Yes	Yes	Yes

Nature of Risk

[General] There are risks of child and forced labour in multiple upstream supply chains involving raw materials inputs for this category such as sand, quartz, silicone, mica and petrochemicals.

[Vulnerable Populations] The raw material inputs required for the manufacture of adhesives and sealants are associated with practices of forced labour involving ethnic minorities and children. In the Xinjiang region, Uyghur, Kazakh, and other minorities are reported to work in silicone supply chains under forced labour conditions, including quartz extraction and sealant manufacturing. US authorities have imposed forced labour import restrictions against a Chinese manufacturer of silica-based products, including silicon sealants, due to the use of forced labour. In Kenya and Uganda, children engage in hazardous sand mining and dredging. In India and Madagascar, approximately 20,000 children work in mica mines under dangerous conditions, exposing them to diseases like silicosis and tuberculosis. Migrant and low-skilled workers in the oil and gas sectors, including related global shipping, may face exploitation and coercion through underpayment of wages and excessive working hours.

[Supply Chain Model] Informal employment is common in Madagascar's mica mining sector where children work alongside their parents in small-scale artisanal operations. Labour hire practices, including outsourcing and short-term contracts, are a key area of risk in the oil and gas industry.

[Regulatory Context] Madagascar has no specific mica mining regulations, and enforcement is limited due to resource constraints. Corruption, political interference, bribery, and the appointment of officials to mining companies exacerbate these issues.

Relevant IRIT Product Categories

WofG0041	Construction	Construction Materials	Sealants and Adhesives
Navigate to the category in the IRIT V2.0 Sheet to review the full risk assessment.			

Risk Assessment Summary – Renewable Energy

RA127	Renewable Energy			
Inherent Modern Slavery Risk Level	Authoritative Determinations (Product)	Vulnerable Populations	Supply Chain Model	Regulatory Context
High		Yes	Yes	Yes

Nature of Risk

[General] Modern slavery risks exist in the mining, processing and manufacture of renewable energy equipment and subcomponents including solar PV panels, battery storage and wind turbines.

[Vulnerable Populations] The solar and polysilicon industry in Xinjiang has been linked to modern slavery through government supported forced labour transfers of ethnic minorities to facilitate the mining of raw materials, and the production of solar-grade polysilicon, ingots, and wafers. Some mining activities of cobalt in the Democratic Republic of the Congo may include workers exposed to modern slavery risks through forced and child labour. Additionally, workers in the balsa wood industry (used to make turbine blades) face modern slavery risks.

[Supply Chain Model] The supply chain of the renewable energy sector is complex and global, encompassing multiple stages from raw material extraction to manufacturing and distribution. This intricate network often obscures unethical practices, including forced labour and unsafe working conditions.

[Regulatory Context] Government restrictions in social auditing make assessing the risk to workers in the PV industry challenging. Regulatory arrangements reduce traceability in some parts of the supply-chain.

Relevant IRIT Product Categories

WofG0181	Facilities and Building Management	Electrical, Mechanical and Elevators	Renewable and Solar Power
Navigate to the category in the IRIT V2.0 Sheet to review the full risk assessment.			

Risk Assessment Summary – Oil and Gas

RA128	Oil and Gas			
Inherent Modern Slavery Risk Level	Authoritative Determinations (Product)	Vulnerable Populations	Supply Chain Model	Regulatory Context
Moderate		Yes	Yes	

Nature of Risk

[General] Modern slavery risks exist in the extraction of oil and gas as well as related shipping activities.

[Vulnerable Populations] The global resources industry heavily relies on migrant and low-skilled workers, who are vulnerable to exploitation due to language barriers, weak legal protections, and economic hardship. Workers in remote or conflict-prone regions often face overcrowded living conditions, underpayment, and coercion into excessive work hours. Additionally, migrant workers involved in Australian offshore oil and gas shipping activities may be exploited through visa programs and vessel licensing schemes.

[Supply Chain Model] Labour hire practices, including outsourcing and short-term contracts, are a key area of risk in oil and gas supply chains. These practices can obscure accountability and increase exploitation risks. Maritime shipping is a further area of supply chain risk, with seafarers often facing forced labour, wage withholding, harsh working conditions and geographic isolation.

Relevant IRIT Product Categories

WofG0035	Construction	Construction Materials	Gas for Construction
WofG0216	Facilities and Buildings Management	Utilities	Oil And Gas Utilities
WofG0231	Fleet Management	Fuels and Lubes	Diesel
WofG0233	Fleet Management	Fuels and Lubes	Petrol or Gas
WofG0488	Specialised Operational and Technical	Non-FM Utilities	Oil and Gas Supply
WofG0511	Specialised Operational and Technical	Traffic, Road and systems	Bulk Fuel

Navigate to the category in the IRIT V2.0 Sheet to review the full risk assessment.

Risk Assessment Summary – Facilities Management: Security Services

RA010	Facilities Management: Security Services			
Inherent Modern Slavery Risk Level	Authoritative Determinations (Product)	Vulnerable Populations	Supply Chain Model	Regulatory Context
High		Yes	Yes	Yes

Nature of Risk

[General] This category includes vulnerable populations and supply chain risks due to labour management practices.

[Vulnerable Populations] A significant migrant workforce is present in the NSW security services sector. They show signs of limited grasp of Australian workplace protections and the risks associated with prevalent labour hiring practices.

[Supply Chain Model] There is some evidence of competition for contracts leading to bids lower than total employee costs, high use of sub-contracting and use of independent contracting arrangements instead of permanent employment when the latter is more appropriate. Labour hire practices also show signs of abuse.

[Regulatory Context] The lack of labour hire licensing regulation can lead to issues such as the exploitation of vulnerable groups. The absence of any labour hire licensing scheme in NSW makes this risk especially pronounced.

Relevant IRIT Product Categories

WofG0201	Facilities and Building Management	Security Services and Equipment	Security Services
Navigate to the category in the IRIT V2.0 Sheet to review the full risk assessment.			

Risk Assessment Summary – Facilities Management: Cleaning Services

RA012	Facilities Management:	Cleaning Services		
Inherent Modern Slavery Risk Level	Authoritative Determinations (Product)	Vulnerable Populations	Supply Chain Model	Regulatory Context
High		Yes	Yes	Yes

Nature of Risk

[General] The risk in commercial cleaning is linked to employment and management practices that exploit vulnerable workers in a price-competitive industry.

[Vulnerable Populations] The cleaning industry's vulnerability is heightened by factors such as dangerous work, low barriers to entry, a large proportion of temporary migrant workers and international students, limited English proficiency, and wage theft.

[Supply Chain Model] Sham subcontracting, pyramid subcontracting, and labour hire arrangements in the cleaning industry can obscure non-compliant practices by creating distance between service-receiving businesses and workers with some cases involving up to four levels of subcontracting. The cleaning industry's complex supply chain structures and opaque contracting practices contribute to the vulnerability of its workforce.

[Regulatory Context] Despite the Fair Work Ombudsman's efforts worker exploitation persists in cleaning companies through offenses like underpayment, sham contracting, and mistreatment. Reduced union access influenced by after-hours restrictions, high casual labour turnover, and employer intimidation may lead to increased worker exploitation whereas workplaces with higher union access may lead to a reduction in exploitation.

Relevant IRIT Product Categories

WofG0201	Facilities and Building Management	Cleaning	Cleaning
Navigate to the category in the IRIT V2.0 Sheet to review the full risk assessment.			