

AFS & Associates Sustainability Report 2023





Report details

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01/07/2022 - 30/06/2023

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Annual

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Contact

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Legal name

AFS & Associates Pty Ltd

Trading name

AFS & Associates Chartered Accountants

Entity type

Australian Private Company

Headquarters

61 Bull Street, Bendigo, Victoria 3550

Countries of operation

Australia

Acknowledgement

We acknowledge and extend our appreciation to the Dja Dja Wurrung People, the Traditional Owners of the land that we work on.

We pay our respects to leaders and Elders past, present and emerging, for they hold the memories, the traditions, the culture and the hopes of all Dja Dja Wurrung People.

We express our gratitude in the sharing of this land, and acknowledge their continuing connection to the land.

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Statement from Board Chair

AFS recognises and relishes our role as a leader in our community. Our steadfast commitment to sustainability spans across environmental, social, and governance (ESG) spectrums. We seek to contribute meaningfully to the well-being of the environment, our stakeholders and our community.

AFS is resolute in implementing responsible practices that go beyond compliance and align with global sustainability goals. We view sustainability as part of our corporate DNA, shaping our decisions, actions and advice.

Whilst the business landscape is dynamic, AFS has embedded sustainability initiatives into our own strategy and committed to helping our clients understand reporting obligations and improvement opportunities in this space.

We believe by proactively addressing environmental, social, and governance matters, we can create enduring value for our business owners, employees, clients, and the broader community. This commitment extends beyond short-term gains and reflects our belief in the importance of responsible and impactful business practices. Whilst our impact on the broader scale may be minimal, we seek to foster progress and continued improvement at a business and community scale.



Bradley Ead
Board Chair
AFS & Associates



Sustainability committee

In order to reflect the varied composition of our organisation, our sustainability committee comprises individuals from every department and hierarchy within AFS, inclusive of two board directors and our CEO.

The committee convenes monthly in its entirety to exchange insights, track progress, and share knowledge. Environment, Governance, and Social champions have been appointed to oversee the reporting metrics for their respective pillars, with the full support of other committee team members.

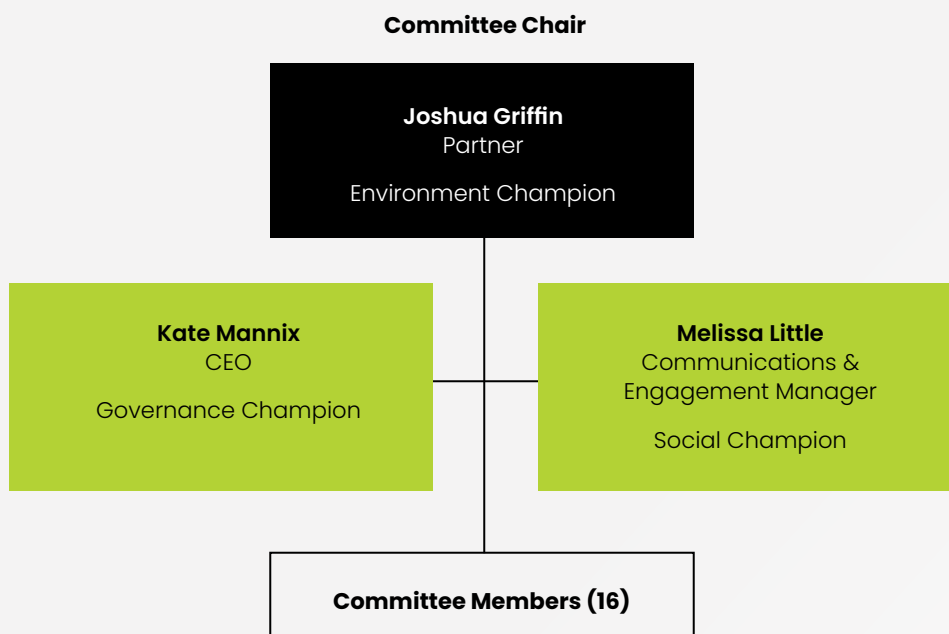
Board engagement

The AFS board is committed to monitoring climate and sustainability risks - this includes nominating two Directors to the internal Sustainability committee to own outcomes and report measurements, progress and initiatives to the Board each quarter.

AFS strategy

We acknowledge ESG as both a climate and business risk. Consequently, we have identified a strategic initiative aimed at enhancing our ESG approach. Our objective is to implement this initiative, with the ultimate goal of producing our inaugural sustainability report.

In addition to our commitment to ESG, our broader focus extends to our clients and the community. We prioritise the longevity and sustainability of our business, while also considering the broader impact we can make on our community and client networks. This involves meeting our internal targets, providing education, and delivering services to enable other organisations to identify, manage, and report on sustainability-related risks and requirements.



Why sustainability is important to AFS

AFS acknowledges the growing significance of sustainability in the business landscape, driven by the evolving expectations of our stakeholders. Our commitment is to take a leadership role and support our team, clients, and community in navigating the future of sustainable business practices. We aim to guide and educate our community on the importance of sustainability as a key focus area and assist them in transitioning toward a more sustainable future.

Given our position as an accounting firm, we are well-equipped to advise our clients on the ever-changing business environment, with sustainability occupying a prominent place on most agendas. The emerging focus on ESG and the establishment and reporting of environmental targets is a shared priority for both our business and our client's businesses.

We recognise the ambition and need to achieve net zero as a common goal with our clients and community and are dedicated to working collaboratively to address this aspiration.

Approach to sustainability

Our inaugural sustainability report has been developed using our ESG Pathway to Sustainability Reporting. Our pathway has been designed to assist organisations (including AFS) work through the key steps to ESG sustainability reporting and follows six phases that each have their own objectives and activities.

- **Identify** and **Consult** with stakeholders
- **Assess** the current ESG activities of the organisation
- **Design** an ESG framework and strategy defining key policies and deliverables
- **Calculate** metrics and identify gaps and strategies to meet or maintain goals
- **Prepare** and deliver your first ESG Sustainability report
- **Monitor** and assess.

Our pathway is designed to be dynamic, serving as a tool for ongoing improvement and the continual development of our sustainability reporting. In our inaugural sustainability report, we establish a baseline by reporting key metrics and documenting our current state. Our intention is not to view this as a static endpoint but rather as the beginning of a journey.

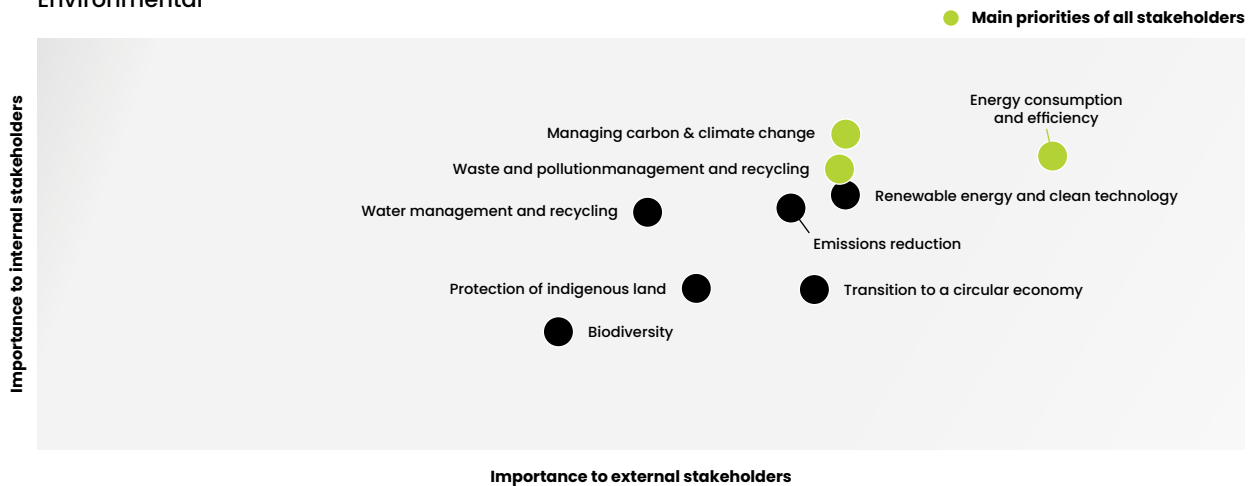
Our goal is to revisit the various phases outlined in our pathway, allowing us to enhance both our reporting capabilities and sustainability objectives. By doing so, we aim to set and achieve more meaningful targets, demonstrating our commitment to continual progress and excellence in sustainability practices.



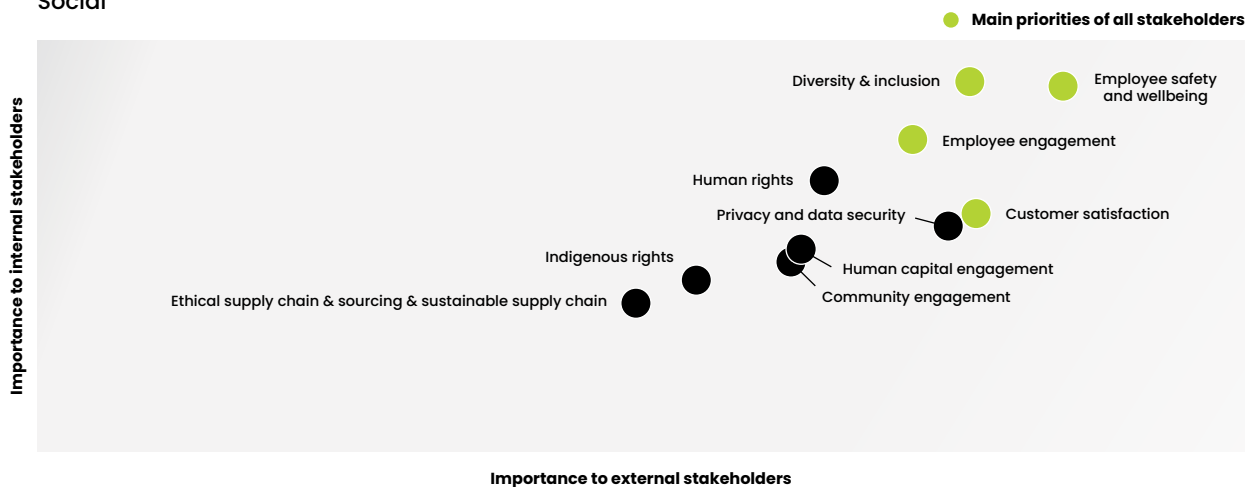
Stakeholder consultation

In order to align our efforts with stakeholder priorities, we surveyed a total of 198 internal and external stakeholders to assess the materiality of common environmental, social and governance themes. This ensures our Sustainability Report focuses on the sustainability risks, opportunities and impacts that are most important to AFS and our stakeholders.

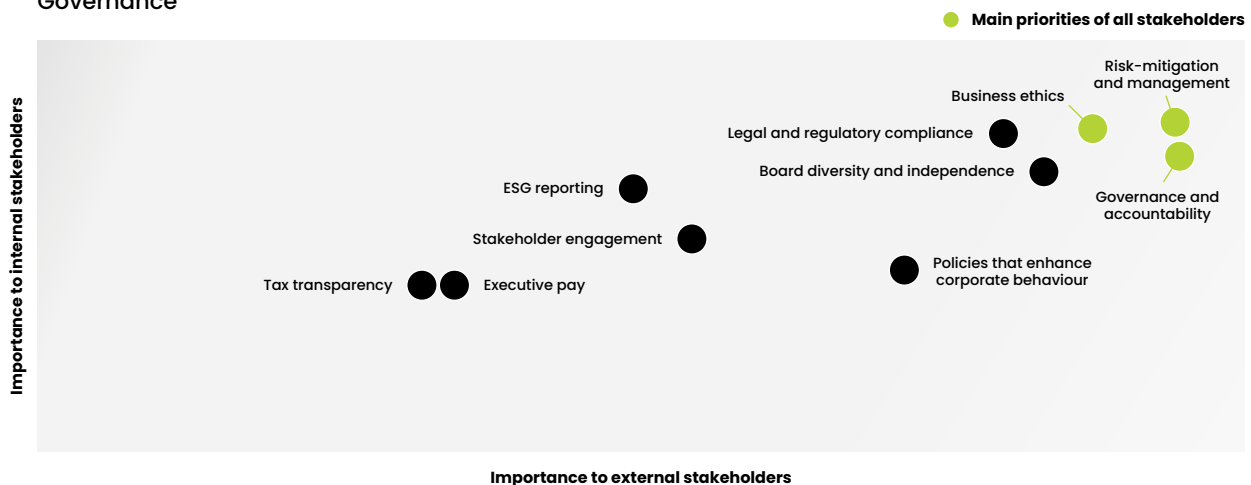
Environmental



Social



Governance



Our materiality assessment identified the following 10 most important environmental, social and governance factors:



Environmental priorities

- Managing carbon and climate change
- Waste and pollution management and recycling
- Energy consumption and efficiency



Social priorities

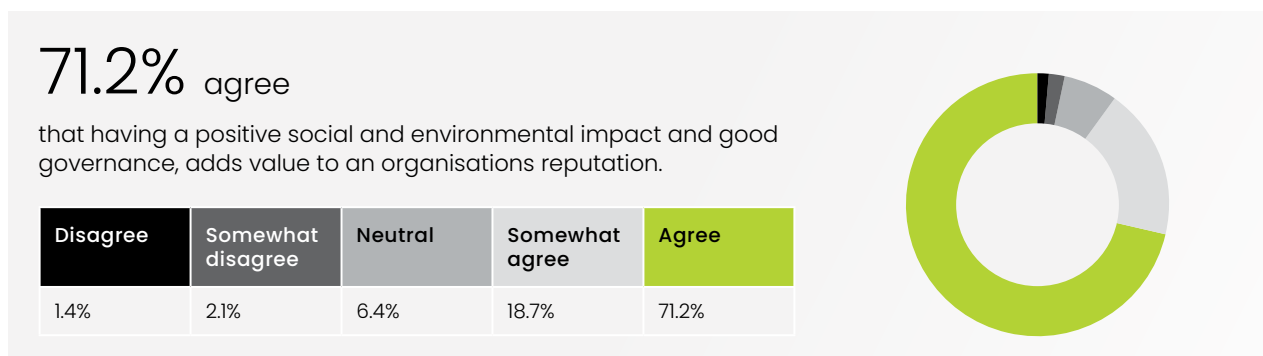
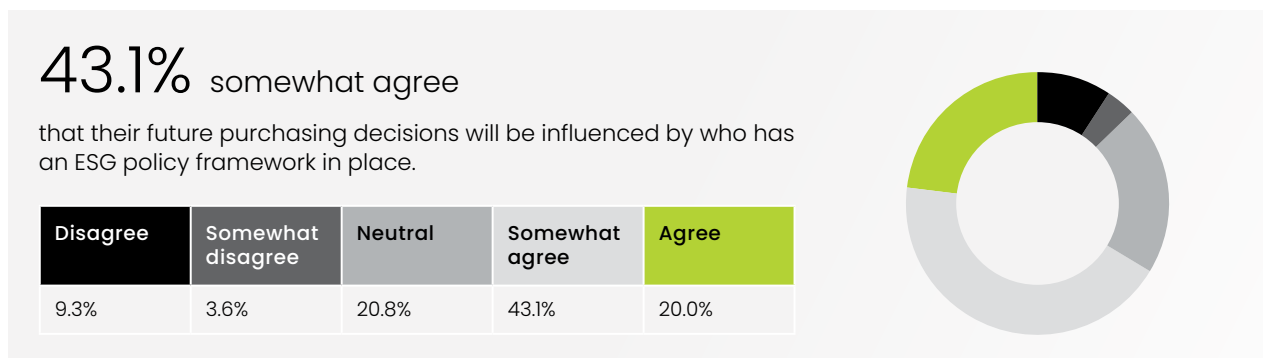
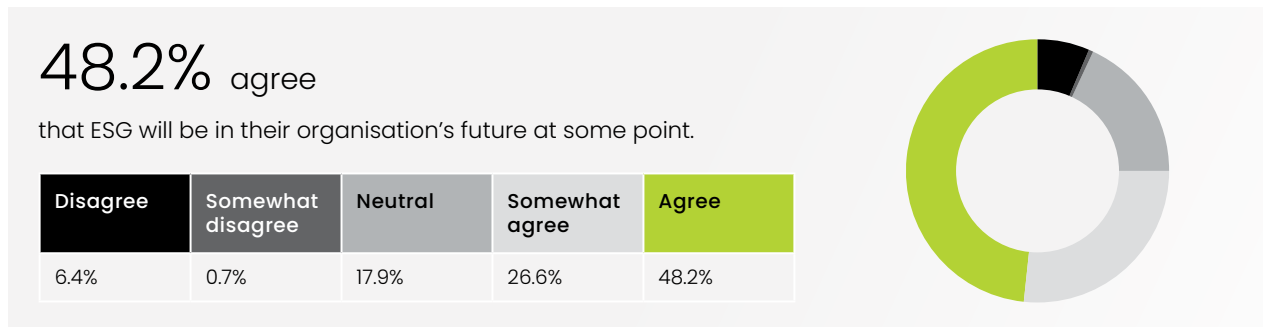
- Diversity, equality & inclusion
- Employee safety and wellbeing
- Customer satisfaction
- Employee engagement



Governance priorities

- Business ethics
- Governance and accountability
- Risk-mitigation and management

We also gained insights into the opinions of our external stakeholders on the future impacts of ESG in business.



Framework guidance

We have utilised the Global Reporting Initiative (GRI) Standards as a base of reporting in our inaugural Sustainability Report. This framework provides a comprehensive set of sustainability reporting guidelines that cover a wide range of environmental, social, and governance issues. The GRI is widely recognised as a leading standard for sustainability reporting.

By incorporating GRI disclosures, organisations can consistently and credibly report information about their impacts. This standardised approach improves global comparability and the overall quality of reported information, aiding users in making informed assessments and decisions related to an organisation's impacts and its contribution to sustainable development.

➤ **The GRI content index can be located towards the end of our sustainability report.**



Environment

Managing carbon and climate change

The reporting period we have chosen to adopt is our financial year (July to June). We selected 2023 to begin our emissions measurement journey.

We engaged an experienced independent carbon advisor to measure our current carbon Scope 1 and 2 emissions. This has highlighted the biggest emissions contributors from our business operations are purchasing of energy to run our office.

Carbon offsetting

Carbon offsetting is the process of purchasing carbon credits to compensate for emissions made, thereby decreasing net emissions.

AFS purchased 69 Australian Carbon Credit Units (ACCU's) to offset our Scope 1 and 2 emissions from Savanna Burning Co-Benefits (Project ID ERF109670).

Savanna Burning with Aboriginal Co-Benefits

Controlled burns are conducted by local indigenous experts using traditional fire management techniques. The process is completed at the end of the wet season to prevent uncontrollable wildfires that devastate the local flora and fauna populations.

Methodology

- ACCUs: Emissions Abatement through Savanna Fire Management
- Co-benefits managed by local indigenous communities with proceeds going back into local communities
- Clean Energy Regulator Certified Projects.

The measuring of emissions guided us to purchase off-set carbon credits and become **carbon neutral for Scope 1 and 2 emissions for the year.**



Energy intensity

808.62 kWh per employee

Carbon Offsets Retired

Type of Offset Unit	Registry	Date Retired	Serial Numbers	Vintage	Quantity
Voluntary ACCU	ANREU	31 Aug 2023	8,331,542,589 - 8,331,542,657	2021-22	69
Total Offsets Retired for this Report					69



Energy consumption and efficiency

Emissions

Total Scope 1 Emissions	68	tCO ₂ -e
Total Scope 2 Emissions	1	tCO ₂ -e
Total Emissions	69	tCO ₂ -e
Total Purchased Offsets	69	tCO ₂ -e
Total Net Emissions	-	tCO ₂ -e



Electricity consumption

- **Activity Data:** Monthly electricity invoices
- **Measured Quantity:** 80,054 kWh
- **Emissions Factor:** 0.85 kgCO₂-e/kWh (VIC)
- **Source:** National Greenhouse Accounts Factors 2022

Relevant sources of GHG Emissions

Source	Description	Types relevant to AFS	GHG Emissions tCO ₂ -e
Electricity consumption	Electricity purchased from the grid or other network, and electricity produced and consumed or exported at the site from fuels or renewable energy sources	Grid electricity, electricity produced by solar panels	68
Process emissions	The use of synthetic greenhouse gases in equipment including HFCs and SF ₆	Air Conditioning units with HFCs	1

Paper-light office environment

AFS made a strategic decision in 2019 to transition to a paper-light office by using a holistic approach that includes digital document management, efficient communication tools, and a corporate culture that promotes sustainable practices.

Printing and paper statistics

1,111

Total pages printed per employee

762

Total sheets used per employee



Environmental goals

- **Short-term targets (1 - 2 years):**
 - Maintain carbon neutrality with Scope 1 and 2 emissions
 - Measure Scope 3 emissions
 - Source renewable energy power supplier
 - Develop strategy to reduce total sheets of paper used per employee
 - Develop strategy for waste management and recycling.
- **Medium-term targets (3 - 5 years):**
 - 25% reduction of total emissions per team member.
- **2030:** 50% reduction of total emissions per team member.
- **2040:** Net zero.

Social

Employee engagement policies and initiatives

A focus on fostering a positive work environment that promotes employee satisfaction through collaboration, strategy and implementation, has helped us develop a motivated and committed team.

These initiatives saw us win the 2022 Employer of the Year Award at the Australian Accounting Industry Awards.

You speak, we listen

Every 12 months employees complete a culture survey so the organisation can gain insights on employee experience.

Flexibility at AFS

Our flexible working policy balances flexibility and collaboration. This setup encourages individual productivity and well-being, while emphasising face-to-face interactions and teamwork through a minimum of two office days per week.

Highlighted as the most positively commented aspect in our 2023 Culture Survey, this policy supports work-life balance by offering flexible hours from 7 am to 7 pm. Team members can align work with personal commitments, enhancing well-being and performance in our supportive work environment.

Dress for your day

The AFS dress code allows team members to choose their outfit to suit their day, from neat casual to corporate wear, whatever they see as appropriate for the day.

Active social club

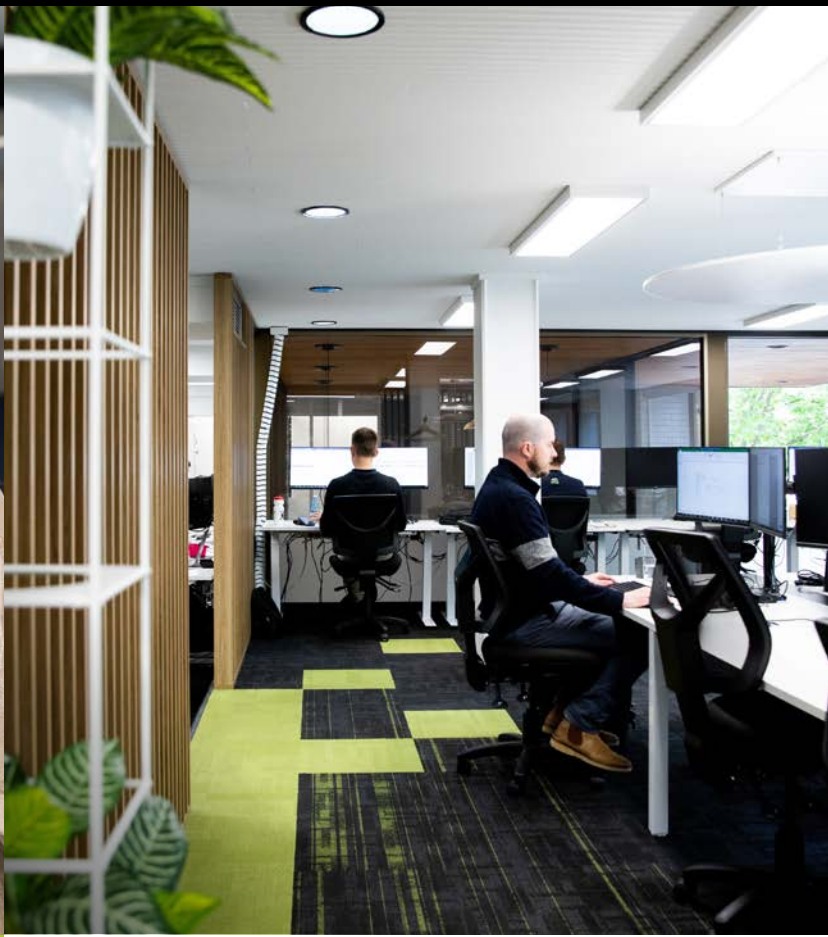
The AFS social club hosts four main events per year, in addition to monthly catch-ups. These events and activities offer valuable team bonding and opportunity for interdepartmental relationships to form.

Recognition Framework

AFS developed a recognition framework to bring recognition front of mind for team members, to foster and encourage peer-to-peer recognition.

We are proud recipients of the Australian Accounting Industry Awards “Employer of the Year Award” 2022.





Employee Net Promoter Score

We utilise the Net Promoter Score (NPS) metric to gauge our employees' engagement and experience. The NPS survey asks employees to rate the likelihood of them recommending AFS as an employer.



81 NPS score

Diversity and equal opportunity

Employee demographics

Employment	Male	Female	Total
Permanent - full time	36	37	73
Permanent - part time	2	17	19
Casual	4	4	8
Total	42	58	100

Board of directors demographics

	Male	Female
Number of individuals <30years	-	-
Number of individuals 30-50 years	77.8%	22.2%
Number of individuals 50+ years	-	-
Total	77.8%	22.2%

Ratio of basic salary and remuneration of women to men

The ratio is calculated based on the average full time equivalent base salary for male and female staff in each employee category as at 30/06/2023.

> Governance	Directors Pay ratio M/F: 100:100 Gender pay gap: 0%	
> Accountants	Management Pay ratio M/F: 100:99 Gender pay gap: 1%	Non-management Pay ratio M/F: 100:101 Gender pay gap: -1%
> Operations/administration	Management Pay ratio M/F: N/A – all female. Gender pay gap: N/A – all female.	Non-management Pay ratio M/F: N/A – all female. Gender pay gap: N/A – all female.
> Overall	Pay ratio M/F: 100:88 Gender pay gap: 12%	

Accountant employee demographics

Management

Age	Male	Female
Number of employees <30years	7.1%	7.1%
Number of employees 30-50 years	50.0%	28.6%
Number of employees 50+ years	0.0%	7.1%
Total	57.1%	42.9%

Non-management

Age	Male	Female
Number of employees <30 years	36.4%	34.5%
Number of employees 30-50 years	12.7%	14.5%
Number of employees 50+ years	0.0%	1.8%
Total	49.1%	50.9%

Operations/administration employee demographics

Management

Age	Male	Female
Number of employees <30years	0.0%	0.0%
Number of employees 30-50 years	0.0%	87.5%
Number of employees 50+ years	0.0%	12.5%
Total	0.0%	100.0%

Non-management

Age	Male	Female
Number of employees <30years	0.0%	35.7%
Number of employees 30-50 years	0.0%	50.0%
Number of employees 50+ years	0.0%	14.3%
Total	0.0%	100.0%



Greater Bendigo Coalition for Gender Equity

AFS are a member of the Greater Bendigo Coalition for Gender Equity, a collective of individuals, groups and organisations who stand together and commit to advancing gender equity in Greater Bendigo, for the benefit of everyone in our community. The coalition is a support network; a place to share learnings; a place to jointly develop and progress initiatives.

Community involvement

AFS and team members **donated and sponsored** a total of

\$23,246



There was **919.5 hours of pro bono work** provided to our community at a value of

\$156,617



Greater Bendigo Coalition Gender Equity Strategy

A shared gender equity framework
2020–2025

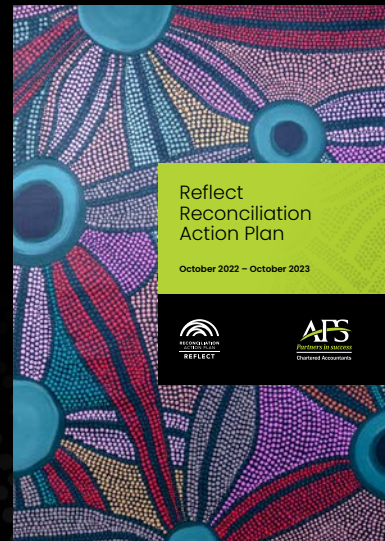


Reconciliation Action Plan

AFS & Associates strive to create a more meaningful place to work and are committed to a sustainable future in all aspects of diversity, equity and inclusion. As such, we have formally committed ourselves towards reconciliation with Aboriginal and Torres Strait Islander peoples in Australia, by launching our first Reconciliation Action Plan (RAP) in October 2022.

The RAP program's strength is its framework of relationships, respect, and opportunities, allowing an organisation to strategically set its reconciliation commitments in line with its own business objectives, for the most effective outcomes.

These outcomes contribute towards the five dimensions of reconciliation; race relations; equality and equity; institutional integrity; unity; and historical acceptance.



New employee hires and employee turnover

New employee hires

Age	Male	Female
Number of employees 18-30 years	10	11
Number of employees 30-45 years	2	5
Number of employees 45+ years	0	1
Total	12	17

Employee turnover

Age	Male	Female
Number of employees 18-30 years	11%	8%
Number of employees 30-45 years	-	8%
Number of employees 45+ years	-	12%
Total	6%	9%

Incidents of discrimination and corrective actions taken

We have had no reported incidents of discrimination in the reporting period. To prevent issues arising, we provide diversity and inclusion training through our online training platform, upon employee induction and regularly educate and celebrate diversity as a team.

Employee safety and wellbeing

Hazard identification, risk assessment, and incident investigation

Our Health, Safety and Wellbeing committee conduct office risk inspections quarterly and annually, to identify work related hazards and assess risk.

Any findings identified follow this procedure:

1. Risk identified
2. Risk assessed using hierarchy of controls
3. Effectiveness of existing controls are assessed and additional controls put in place
4. Control review dates are set > action register updated with OH&S committee
5. Residual risk is assessed.

Incidents, hazards, near misses and injuries are reported via our online employee portal and assessed and actioned by our People & Culture Manager.

Our Workplace Health & Safety training helps employees identify hazards and risks, and act safely in the workplace.

Our employees are protected under the Occupational Health and Safety Act wherein it prohibits discriminatory, coercive or misleading conduct in relation to raising safety concerns in the workplace.

Worker participation, consultation, and communication on occupational health and safety

Our online learning management portal allows us as an organisation to review, allocate and report on the completion and acknowledgement of the training and information allocated to our employees.

Worker training on occupational health and safety

AFS provides training to employees during induction and regular refresher training for all team members including:

- Emergency Management Procedures
- Hazard and Risk Identification / reporting
- Ergonomics and manual handling
- Injury management
- Hygiene at work
- Mental health first aid.

Work-related ill health or injuries

Work-related ill health	0
Work-related injury	1

Employee Assistance Program

Our employee assistance program (EAP) offers up to three free confidential counselling sessions per team member, with available extension requests.

16% EAP utilisation rate



Mental health first-aiders

41% of our people leaders are trained in mental health first aid.



Promotion of worker health

AFS joined 1,000 other Victorian workplaces to ignite a happy, productive and healthy workforce in the Healthy Workplaces Achievement Program.

The program is a free, evidence-based health and wellbeing program designed to help workplaces create an environment that promotes health and healthy behaviours.

The program is aligned to the World Health Organisation's healthy workplaces model and Occupational health and safety management systems. It is supported by the Victorian Government and delivered by Cancer Council Victoria.



HEALTHY WORKPLACES Achievement Program



Client satisfaction

Our “Client First Focus” for sustainable partnerships

At AFS, our commitment to putting clients first is not only a core value but a guiding principle that shapes every aspect of our business operations. We understand that the success of our clients is intertwined with our own success, and we continuously strive to exceed their expectations. In line with our Client First Focus, we prioritise client satisfaction as a key driver in our sustainability efforts. We believe that by fostering strong, sustainable relationships with our clients, we contribute to a mutually beneficial and enduring partnership.



Measuring loyalty and experience: Net Promoter Score (NPS) and Satisfaction Score

To quantitatively assess the loyalty and experience of our clients, we employ the Net Promoter Score (NPS) metric. The NPS is a powerful tool that gauges client sentiment by asking them to rate the likelihood of recommending AFS services to friends or colleagues. By categorising respondents as Promoters, Passives, or Detractors, we gain a clear understanding of our overall client sentiment and loyalty. This valuable metric, alongside the Satisfaction Score, serves as a benchmark to track our progress over time and compare our performance against industry standards.

Category	Score
NPS	69.5
Client retention	93
Client satisfaction	92

Survey schedule:

Business services and taxation clients	Quarterly
Audit clients	Quarterly
Community Banks	Annually

Empowering open-ended feedback

In addition to the NPS and Satisfaction Score, we actively seek qualitative insights through open ended feedback during our surveys. This approach allows clients to provide detailed comments, suggestions, and opinions that offer deeper context to their NPS scores. Clients are also invited to share their experience at any time, by emailing feedback@afsbendigo.com.au. This qualitative feedback provides us with actionable insights that can drive targeted improvements and innovation. By enabling clients to voice their thoughts openly, we show that we value their input and are committed to addressing their concerns effectively.





Open forum and collaboration

Our Client Advisory Meetings stand as a testament to our commitment to nurturing client relationships, as we bring clients to the heart of our improvement efforts. These sessions offer a platform for clients to share insights, experiences, and evolving needs. To ensure impartiality, we engage an independent marketing firm to moderate these discussions, fostering transparent and candid exchanges. By listening closely to client viewpoints, we gain valuable insights that drive service enhancements, innovation, and strategy alignment. These meetings exemplify our Client First Focus, solidifying our dedication to sustainable partnerships built on mutual understanding and collaboration.

Feedback as a catalyst for improvement

We take client feedback seriously, valuing it as a crucial source of insights to enhance our services and operations. The responsibility of monitoring feedback lies with our Communications and Engagement Manager and our CEO. This joint oversight ensures that feedback is evaluated from both operational and strategic perspectives. Every quarter, these insights are shared with our board, enabling us to collaboratively assess any potential areas for improvement or development. We extend this commitment to the client Partner by promptly informing them of feedback that pertains to their engagements, encouraging a proactive approach to addressing concerns and improving collaboration.

Integration into company strategy

Client feedback is not just an isolated data point; it is a driving force behind our company strategy. By incorporating the valuable insights we gather from our clients, we ensure that our decisions align with their needs and expectations. Our commitment to sustainability encompasses the satisfaction of our clients, as their continued loyalty and trust form the foundation of our enduring success. The integration of feedback into our strategy allows us to foster innovation, optimise processes, and tailor our services to meet evolving client demands.

Social goals



Clients:
Maintain an NPS score of above

70



Team members:
Maintain an NPS score of above

75

Governance

Governance structure

AFS & Associates Pty Ltd highest governance body is the Board of Directors, the 'Board'. The CEO reports to the Board which is led by Bradley Ead as Chair.

Our nine Board members are from:

- > 45% External audit
- > 33% Business services
- > 22% Internal audit

The Board works with our CEO and our Environmental, Social and Governance (ESG) Committee. The ESG Committee includes 18% of our employees, including two Board members, the CEO and employees from across our organisation. This ensures our broader team are educated on ESG related matters. The Committee reports and makes recommendations to the Board via the CEO, ultimately putting the objectives and responsibility of AFS achieving their ESG targets, at the Board level.

The Board comprises of all equity Partners at AFS, the Chair is elected by the members of the Board and rotated every two years. The decision making and expenditure approval parameters mean the Chair cannot make material decisions without consensus, reducing any independence risks. The nomination process to the Board is tied to equity ownership and equity recommendations and allotment are approved by Board members.



Our focus areas are shaped by:

- Employee feedback
- Client feedback
- Stakeholder engagement
- Organisational data
- Economic, environmental and social impacts.

Annually all Board members are required to complete an independence declaration, and update these throughout the year if any new conflicts arise.

The Board and CEO annually assess AFS' purpose, values, and set short and long-term strategic goals for sustainable business and industry development. The Board approves the finalised strategy, and the CEO is responsible for its delivery, providing quarterly progress and impact reports to the Board.

The AFS team is annually surveyed for engagement levels and organisational development opportunities. Clients are cyclically surveyed to understand engagement levels and experiences, utilising various methods such as online surveys, in-person meetings, and structured advisory sessions. Quarterly reports on these results are presented to the Board, with a yearly summary for the annual strategy day.

The AFS' ESG Committee is responsible for the collation and preparation of the sustainability report, with review conducted by the CEO and Board representatives on the committee. Once they have completed their review, the sustainability report will be presented to the Board for final review, approval and adoption.



Board members

CEO



Adrian Downing
External Audit/
Internal Audit



Bradley Ead
Internal Audit



Damien Palmer
Business Services



Dennis Barnett
Business Services



Jacob Lea
Business Services



Kate Mannix



Jessica Ritchie
External Audit



Joshua Griffin
External Audit



Katie Dempster
Internal Audit



Lachlan Tatt
External Audit

Cyber security

Cyber security training

The importance of cyber security is prevalent in the everyday operations of AFS. We take a proactive approach, centred around education, testing and training of employees in order to build human resistance to risk of a cyber security breach.

We utilise the world's largest integrated platform for security awareness training, combined with simulated phishing attacks to train and test our team.

Training subject	Employee completion
Common threats	95%
Creating strong passwords	96%
Security awareness training	94%

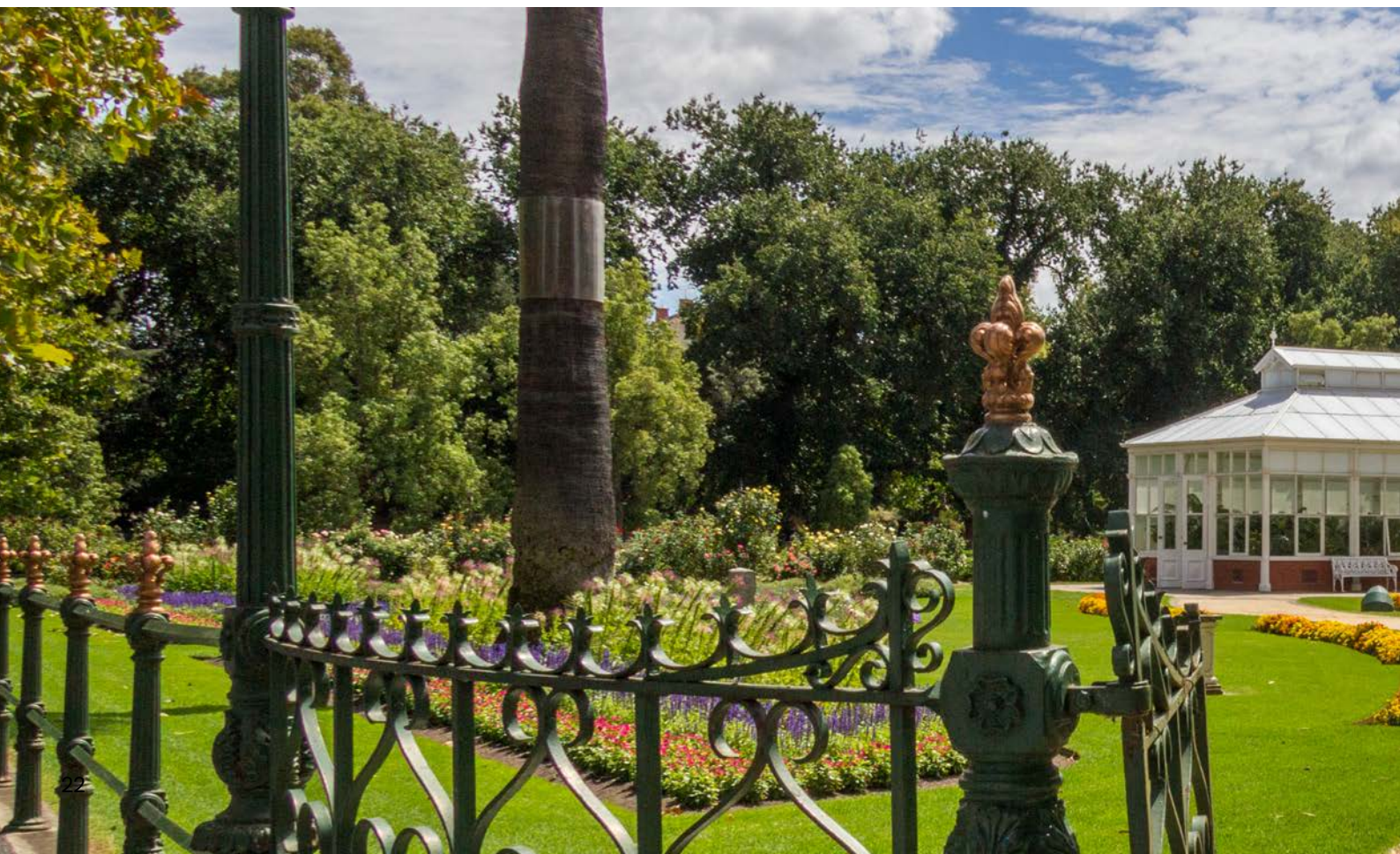
Information Security Review

We have engaged with a third party to conduct an information security review of our organisation, with the key initiatives and focus areas being:

- **Access control:**
Least privilege access model
- **Identity management:**
Centralised identity management
- **Asset handling:**
Information classification and handling
- **Risk management:**
Operational level risk assessments
- **Planning and preparation:**
Business continuity planning.

Multi-Factor Authentication (MFA)

Our use of MFA enhances our overall cybersecurity posture, safeguarding both our organisation and the individuals associated with it from potential security vulnerabilities and unauthorised access attempts.



Business ethics

Approach to tax

As registered tax practitioners, we play a significant role in influencing and supporting the tax system. All personal tax obligations need to be up to date in line with community expectations and taxation laws.

The Tax Practitioners Board's (TPB) Code of Professional Conduct requires our registered agents to comply with the taxation laws in the conduct of client's personal affairs.

We ensure that personal tax affairs, including those of related entities have:

1. lodgement of tax returns on time
2. lodgement of BAS on time
3. tax bills or amounts owed to the ATO are paid on time or an arrangement of repayment is agreed to by the ATO.

Any concerns regarding the integrity of our organisation's business conduct can be raised at a Board meeting, along with the presentation of financials.

Local spending

29% of invoices paid and commitments made by AFS for the period was with local suppliers, with local defined as being within 50km of Bendigo, Victoria, Australia.

Local labour

100% of our labour is in Victoria, Australia.



Governance goals

Incorporate increased governance through:

- Development of a risk and governance Board sub-committee
- Embed sustainability risk assessment into decision making across AFS
- Continue to educate and assess sustainability risks.

GRI content index

Statement of use: AFS & Associates has reported the information cited in this GRI content index for the period 01/07/2022 – 30/06/2023 with reference to the GRI Standards.

GRI 1 used: GRI 1: Foundation 2021.

GRI standard	Disclosure	Page
GRI 2 General Disclosures 2021	Disclosure 2-1 Organizational details	IFC
GRI 2 General Disclosures 2021	Disclosure 2-3 Reporting period, frequency and contact point	IFC
GRI 2 General Disclosures 2021	Disclosure 2-7 Employees	12
GRI 2 General Disclosures 2021	Disclosure 2-9 Governance structure and composition	20
GRI 2 General Disclosures 2021	Disclosure 2-10 Nomination and selection of the highest governance body	20
GRI 2 General Disclosures 2021	Disclosure 2-11 Chair of the highest governance body	20
GRI 2 General Disclosures 2021	Disclosure 2-12 Role of the highest governance body in overseeing the management of impacts	20
GRI 2 General Disclosures 2021	Disclosure 2-13 Delegation of responsibility for managing impacts	20
GRI 2 General Disclosures 2021	Disclosure 2-14 Role of the highest governance body in sustainability reporting	20
GRI 2 General Disclosures 2021	Disclosure 2-15 Conflicts of interest	20
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