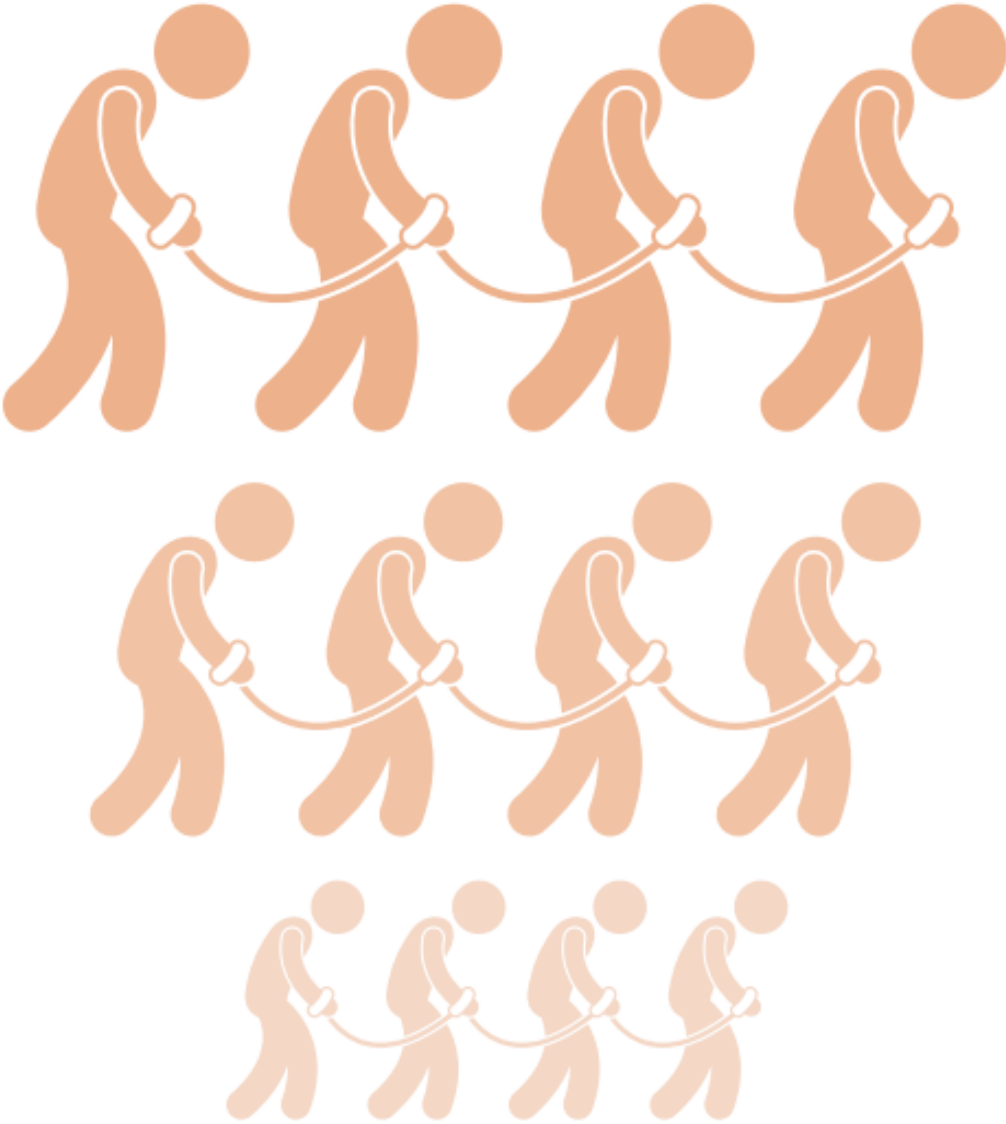


Trustees of Kildare Ministries



2023 MODERN SLAVERY STATEMENT



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Acknowledgment of Country

Kildare Ministries proudly acknowledges the Traditional Custodians of Country throughout Australia and their continuing connection to lands and waterways upon which we depend. We pay our respects to Elders, past, present, and emerging.

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Message from the Executive Director

The Kildare Ministries values are steeped in the Gospels, and our Living Justice Living Peace Charter is the cornerstone of our justice program. It is upon these frameworks that we approach social issues such as modern slavery.

Kildare Ministries aims to influence our schools and ministries to pay attention to the way they run their operations and interact with people everyday. Modern slavery is no exception. The Catholic values we uphold in all our ministries would never permit the exploitation of people through coercion, threats or deception to undermine or deprive them of their freedom.

We are cognisant of the fact that an estimated 45 million people worldwide can be affected by this abhorrent crime, and that it can occur in any sector, industry or country. We are committed to doing our part in eradicating modern slavery and human trafficking.

Australia's Modern Slavery Act 2018 (Cth) requires Australian organisations with an annual revenue in excess of AUD\$100 million to report on the risks of modern slavery in their operations and supply chains and action taken to address those risks. We welcome this opportunity to report on our risks and initiatives to create a positive impact in this area.

This is third annual statement in which we explain the work carried out in this area during the year 2023. In 2023, we built on the work commenced in prior years in increasing awareness, conducting due diligence tests and embedding a modern slavery risk management culture into our procurement process in our ministries. The appointment of a third party iPRO, to assist with our work with supplier assessments helped enhance their awareness and responsiveness.

At TKM we strive for continuous improvement in our policies and processes, which incorporate the values of respect for all human life, dignity, diversity and inclusivity.



Erica Pegorer

Executive Director

Executive Summary

This Modern Slavery Statement is made in accordance with section 14 of the Australian Modern Slavery Act 2018 (Cth) (MSA).

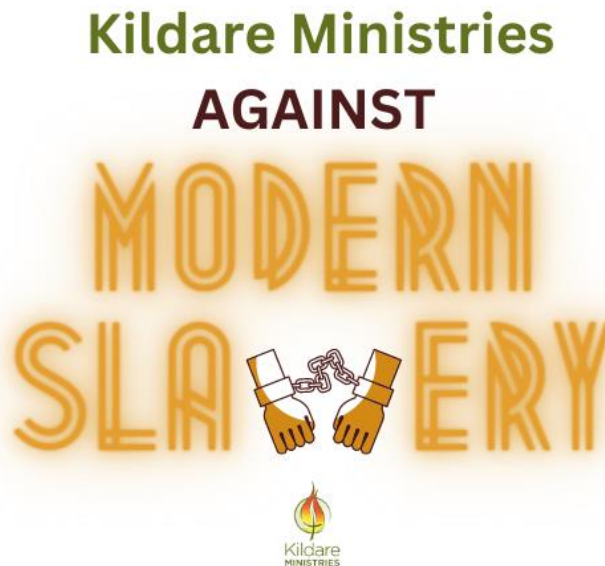
It describes steps taken by the Trustees of Kildare Ministries (TKM) during the year 2023, to identify, mitigate and manage the risk of modern slavery and human trafficking in our ministries and supply chains. This is our third modern slavery statement made under the MSA.

This statement is a joint statement made on behalf of the group. The individual entities within the group fall below the threshold for reporting entities with revenue exceeding \$100 million in the reporting period.

Our Commitment

Our Living Justice Living Peace Charter which provides a framework for each of our ministries, challenges our communities to seek justice so that we can all live in peace: for without justice there is no peace. We are committed to promoting high ethical standards, responsible work practices and protecting human rights of all individuals. As part of this commitment, we do not tolerate modern slavery within our operations and to ensure the Trustees, Boards and employees are aware of their obligations to disclose any act of modern slavery.

We have been able to create better awareness within our schools and with our suppliers. In our schools we aimed to deliver the message that we can positively influence the people in the supply chain through our own procurement decisions. We recognise that respect for human rights requires long-term focus and our schools work with students to ensure these values are carried through into the future.



create better awareness our suppliers. In our the message that we can impact we have on through our own recognise that respect for term focus and schools work with values are carried

There was better supplier engagement in 2023, which resulted in our ability to deep dive into the supply chains and identify areas of risk.

We are committed to continuous improvement in our practices to combat modern slavery in subsequent reporting periods. We seek to engage with partners who respect and uphold the human rights of others.

SECTION ONE: COVERED ENTITIES

This section of the statement addresses the requirement of Section 16(1)(a) of the Modern Slavery Act 2018 by providing an overview of which entities are covered by the statement.

Kildare Ministries comprises 10 schools and 3 community services NFPs.

- Brigidine College Indooroopilly, QLD
- Brigidine College St Ives, NSW
- Clonard College Herne Hill, VIC
- Kilbreda College Mentone, VIC
- Kildare College Holden Hill, SA
- Killester College Springvale, VIC
- Marian College Ararat, VIC
- Marian College Sunshine West, VIC
- Star of the Sea College Brighton, VIC
- St Joseph's College Echuca, VIC
- Saltbush Balnarring Beach, VIC
- Brigidine Asylum Seeker Project, VIC
- Wellsprings for Women Dandenong, VIC



Marian College
Ararat



Clonard College
Geelong



Star of the Sea
Brighton



Brigidine College
Indooroopilly



St Joseph's College
Echuca



Killester College
Springvale



Kildare College
Holden Hill



Marian College
Sunshine West



Kilbreda College
Mentone



Brigidine College
St Ives



Wellsprings for Women
Dandenong



Brigidine Asylum Seeker Project



SECTION TWO: STRUCTURE, OPERATIONS AND SUPPLY CHAINS

This section outlines Kildare Ministries' structure, operations and identified supply chains as required by Section 16(1)(b) of the Modern Slavery Act 2018.

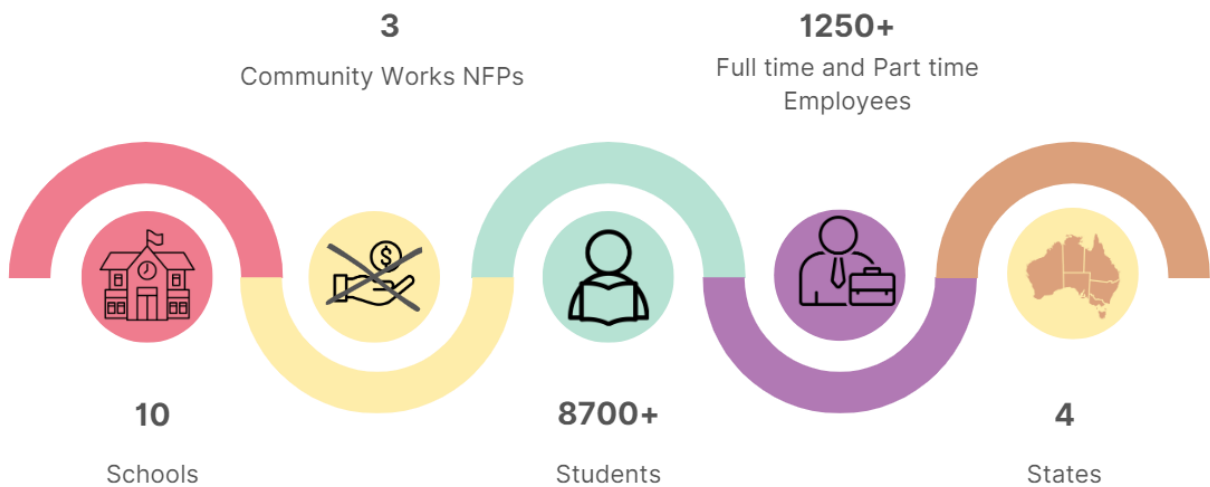
Kildare Ministries comprises the educational and community works formerly governed by the Brigidine Congregation, NSW Brigidine Province, Victorian Brigidine Province, and the Presentation Congregation of Victoria and is in its 10th year of operations. Kildare Ministries offers secondary school education in Victoria, New South Wales, South Australia, and Queensland, as well as community services within an inclusive and socially just context.

It attempts to nurture a vision of life in which the belief in the dignity of each individual, characterised by personal integrity and compassion, informs thinking and action and enables all to take their rightful place in Church and society.

The Vision, Mission and Values of Kildare Ministries are based on Catholic social teaching. Our vision is for a community that values human dignity and strives for the common good of all creation. We seek to develop an active, discerning community that speaks out against injustice through action.

All KM entities are united in the belief that action against modern slavery is fundamental to Catholic Social Teaching.

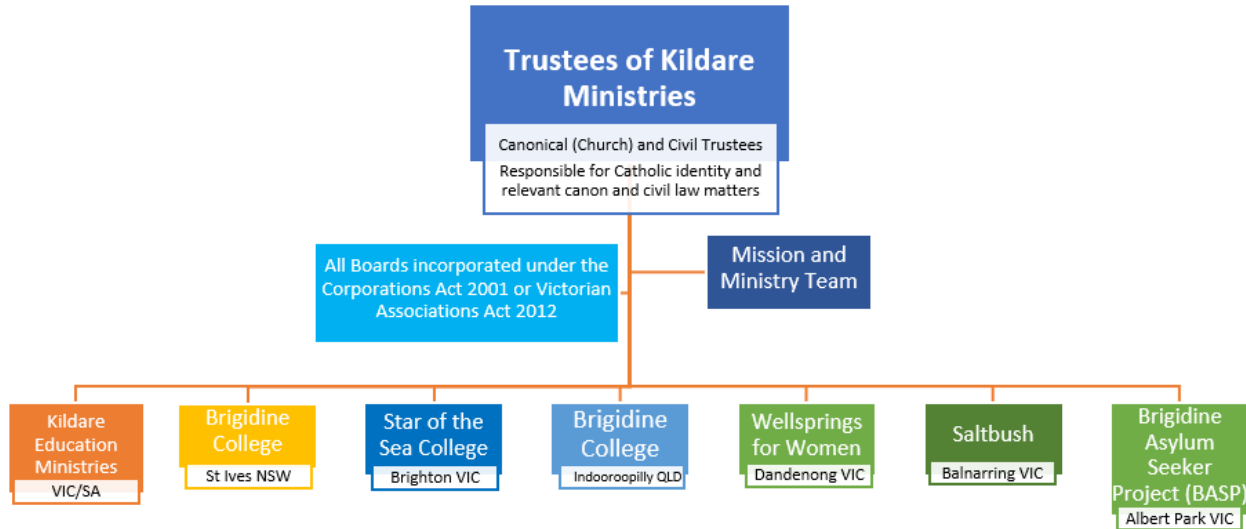
Kildare Ministries At a Glance



Governance of Kildare Ministries

Kildare Ministries operate as a Public Juridic Person (PJP) established by decree of the Holy See.

The following diagram outlines the current governance structure of Kildare Ministries:



Kildare Ministries key operations and associated supply chains

Our operations and activities are conducted wholly within Australia, and most of our purchases of goods and services are from tier one Australian suppliers. TKM consists of 10 schools and 3 community works charities, with each entity having autonomy for operations with their own management team and are responsible for ethical sourcing of their supplies.

As primarily educational and service-based institutions, the key element of group expenditure is employment related costs which represent approximately 70% of total expenditure. Most school staff are directly employed, and wages are paid in accordance with the respective Enterprise Agreements. Some staff are also members of the Independent Education Union (IEU), which has within it, provision for staff consultation on matters related to workload issues amongst other things.

Other than staff related costs, our expenditure can be broadly categorized as follows:

Expense Category	Typical Goods and Services
Property expenses	Rent, Utilities, Repairs, Maintenance, Construction and related costs
Teaching and Learning materials	Books, Teaching materials and other consumables

Uniforms and Sport

School and Sport Uniforms, Sports Equipment

Technology and equipment

Computers, Hardware, Software, Mobile phones, AV equipment, Gym, Musical instruments

Admin Expenses

Office equipment, Stationary, Furniture, Services such as cleaning, onsite canteen, waste management, security

Promotion and Communication

Advertising material and communication services

Professional Services

Audit, Legal services, Insurance, Consultancy

Travel, Meetings and Events

Air travel, Accommodation, transport & venue hire

Our suppliers operate in the following sectors:

- Accommodation and food service activities
- Agriculture, forestries, and fishing
- Construction
- Domestic work
- Maintenance and repair of motor vehicles
- Manufacturing
- Personal services
- Transportation
- Wholesale and trade

SECTION THREE: RISK OF SLAVERY IN OUR OPERATIONS AND SUPPLY CHAINS

Section 16(1)(c) of the Modern Slavery Act 2018 requires modern slavery statements to describe the modern slavery risks in operations and supply chains of the reporting entity. This section outlines the risk areas in Kildare Ministries' operations and supply chains.

Modern slavery refers to various forms of exploitation and coercive practices that deprive individuals of their freedom, rights, and dignity. It encompasses situations where individuals are forced or coerced into labour, servitude, or human trafficking against their will. Modern slavery can take different forms, including forced labour, debt bondage, forced marriage, human trafficking, and child labour.

The International Labor Organisation estimates that over 40 million people around the world are victims of modern slavery. In recent years, supply chain transparency is a key policy strategy used by governments to identify and prevent business practices that lead to modern slavery.

TKM has assessed the risk of modern slavery in our operations as low. Our workforces are mainly self-recruited and paid based on the respective EBA of the state the schools operate in. These awards confer minimum pay and entitlements. We recognise the right of our staff to negotiate collectively through the unions they belong to.

We recognise there is a potential for KM to contribute to modern slavery practices through the purchase of certain goods and services.










Analysis of our supply chains identified the potential for slavery risk across some supply chain areas, and will be discussed in more detail in the following sections of the statement.

Supply Chain

Our suppliers operate, produce, and source across several different sectors. Some of these sectors can be described as high-risk. High-risk sectors are those in which human trafficking activities are known to occur and were identified in the Global Estimates of Modern Slavery and child labour exploitation that were separately identified in Child Labour: Global Estimates 2020 Trends and the Road Forward (ILO and UNICEF, 2021).

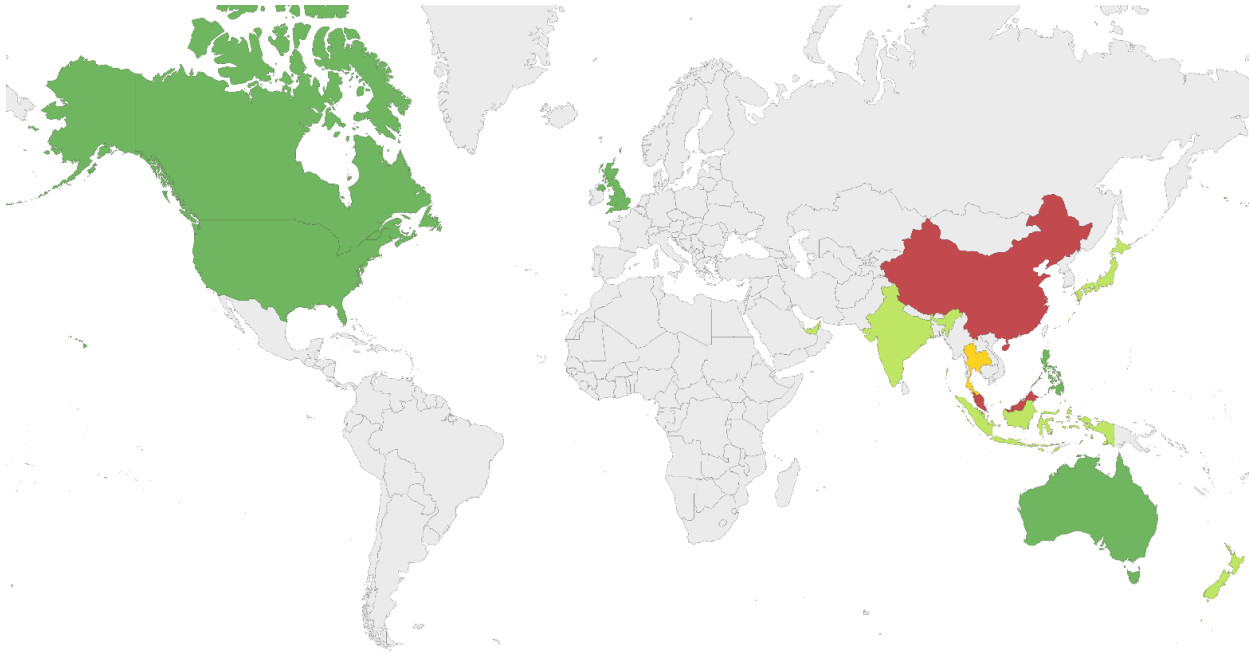
Sourcing goods in High-risk Sectors

The below graphics show the high-risk sectors of operation for our suppliers. The numbers in the graphics describe how many suppliers are in the corresponding sectors.

 <p style="text-align: right;">26</p> <p>Accommodation and food service activities</p>	 <p style="text-align: right;">4</p> <p>Agriculture, forestries, and fishing</p>
 <p style="text-align: right;">28</p> <p>Construction</p>	 <p style="text-align: right;">2</p> <p>Domestic work</p>
 <p style="text-align: right;">17</p> <p>Maintenance and repair of motor vehicles</p>	 <p style="text-align: right;">48</p> <p>Manufacturing</p>
 <p style="text-align: right;">5</p> <p>Personal services</p>	 <p style="text-align: right;">15</p> <p>Transportation</p>
 <p style="text-align: right;">65</p> <p>Wholesale and trade</p>	

Some countries or regions where our suppliers operate, as well as some goods produced and sourced by our suppliers, can be described as high-risk due to the possibility of a link to modern slavery practices such as Forced Labour, Human Trafficking, Child Labour, and Debt Bondage.

The geographical regions where our supply chain partners operate are shown in the map below. This map, and the supply chain maps that follow, have been overlaid with the colour tier system of the [Trafficking-in Persons Report](#).



There is modern slavery risk associated with producing the following goods from the countries listed below:

- Bangladesh
 - Garments
 - Textiles
 - Textiles (jute)
- Thailand
 - Garments
- India
 - Soccer Balls
- Malaysia
 - Rubber Gloves
- Vietnam
 - Furniture
 - Garments
 - Textiles
- China
 - Christmas Decorations
 - Electronics
 - Footwear, Garments, Gloves, Textiles, Thread/Yarn, Hair Products

SECTION FOUR: ACTION

Section 16(1)(d) of the Modern Slavery Act 2018 requires modern slavery statements to describe the action taken. This section outlines the action taken by Kildare Ministries to assess and address risks, including due diligence and remediation processes.

Approach to due diligence

We monitor our exposure to modern slavery risk using a combination of external research data, new supplier screening using our supplier code of conduct and our supplier engagement guidelines. The supplier code of conduct details TKM's minimum expectations and non-negotiable requirements in the areas of human rights and labour practices.

During 2023, we continued to consult and work with the school Business & Risk Managers to help educate their staff and suppliers about modern slavery risk, and try to find ways for mitigation in our supply chains.

In 2023 TKM engaged the services of iPRO Software, an Australian-based company that specialises in assessment and management solutions for Modern Slavery. Through this engagement, TKM has access to their iPRO Modern Slavery Assessment Tool to assess modern slavery risks in our supply chain. The risks noted in the previous section were identified utilising this assessment tool. We engaged iPRO during the reporting period to conduct a bulk assessment of 567 of our suppliers. We intend to carry this process forward as an annual assessment of our supply chain, while incorporating improvements in the process.

Participating suppliers were asked to complete a self-assessment questionnaire online. After each supplier completed and submitted the questionnaire, their responses were assessed to determine their modern slavery risk scores and associated risk category.

Each supplier that completed the assessment was assigned one of the following risk categories:

- High-risk (high levels of inherent risk)
- High-risk (inadequate risk control)
- Medium-risk (partial risk control)
- Low-risk (adequate risk control)
- Low-risk (low levels of inherent risk)

To determine the appropriate risk category, responses were first evaluated for risks inherent to a supplier's operations, production, and sourcing. This is referred to as the Inherent Risk Score. The Inherent Risk Score was calculated based on the geographical, type of goods, industry sector, and workforce parameters that the supplier indicated in the Modern Slavery Assessment Tool (MSAT).

Next, the Unmitigated Risk Score was evaluated. This score was calculated based on the policy and procedure responses on the questionnaire. A supplier's Unmitigated Risk Score determined whether they were categorised as having inadequate, partial, or adequate risk control.

Then, the risk scores for each assessed supplier were aggregated and averaged, resulting in an Aggregated Inherent Risk Score and an Aggregated Unmitigated Risk Score for the overall supply chain.

Additionally, we've begun conducting due diligence relating to modern slavery risks by utilising the iPRO Modern Slavery Assessment Tool as part of our new supplier procurement process. The tool allows us to ask suppliers to upload documentation to support their assessment responses. As part of a new suppliers onboarding, they will complete the modern slavery assessment in addition to our other quality and compliance checks.

Further Action with suppliers

Suppliers that completed the self-assessment were given action items to complete post-assessment. The action items provided to each supplier were based on their responses to the questionnaire, and if implemented, will reduce the unmitigated risks identified during the assessment. Action items were also aggregated, giving TKM a focused view of the most impactful actions that could be taken by suppliers across the supply chain.

We have started rolling out a supplier follow-up initiative to further discuss the action items and address the risks identified through the assessment. Primarily this involves ensuring that suppliers have the right policies and procedures in place to mitigate inherent risks in their business.

Other ways we are addressing modern slavery risks include:

Developing the next generation of leaders

Kildare Ministries is focused on educating young people about social justice so they can be future leaders in combatting modern slavery. We know that empowering students to give voice to those who are powerless and silent will help combat modern slavery.

Some of the key areas of action include:

- Social Justice Retreat where students met to discuss ways to address social injustice and inequality with our core values, Courage and Compassion.
- Kildare Ministries Justice and Sustainability Network meets three times a year with students hearing from guest speakers on Advocacy, Activism and Action
- Students are also challenged to think critically about the social justice fight and how to fight for those who are most vulnerable in society
- Building and enhancing student leadership skills and firmly establish their identity as emerging leaders in the tradition and identity of Kildare Ministries
- Taking time to reflect on the courage of people to hold firm to their faith and allowing transformational spiritual shifts toward becoming people of compassion, peace and justice
- Through Net Zero projects, encouraging students to understand supply chains and the people involved in producing goods and services

Schools also work with other areas of Kildare Ministries, such as the Brigidine Asylum Seeker Project (BASP) and Australian Catholic Religious Against Human Trafficking (ACRATH). Star of the Sea students met with Sister Brigid Arthur AO, csb, of BASP, who is a passionate humanitarian, who encouraged the students to think about the "rights" they would like for themselves, and to extend them to others.

Courage to speak up and take action on social justice matters was also a key theme across the whole of Kildare Ministries in 2023. The motto of "Ignite Courage - Create Change" was embraced at all the schools. Specific examples include:

- A challenge put to students to continue to be witnesses to justice and lights to the world for their community (Brigidine College Indooroopilly)

- Senior Social Justice leaders were courageous in organizing a Social Justice Forum in 2023. These courageous young women created the opportunity for advocacy and awareness of these important and prevalent social issues for the students and staff present at the event (Brigidine College, St Ives)
- A call to “Be not afraid! Take Courage. Arise!” was the vision embraced for learning that responds to the global call to transform the purpose of education (Clonard College)
- Encouraging everyone in the school community to become agents of change and seek to make a discernible difference to those around them (Kilbreda College)
- The Living Justice: Living Peace philosophy, and a call to bring justice where it is needed was embraced by students. (Star of the Sea College)

Our students’ voice

“She (Sister Brigid) ignited courage in us to embrace our differences and change our lens in life.” – Star of the Sea College Living Justice Captain

“After listening to Sister Brigid, I feel passionate and motivated. She voiced the importance of being activists for change, and how we, as high school students, can make a positive difference within our community. Star of the Sea College Living Justice Captain

“we learnt that we are lifelong learners and that we should never underestimate our powers as young leaders.” Leaders of Kildare College, Adelaide

Remediation

We are committed to ethical and responsible conduct within our operations and to improving the communities where we live and work. We respect the human rights of all our people and those we work alongside, in both our supply chains and the communities in which we operate. Kildare Ministries is committed to the safety of all children and adults at risk, promoting the safety, wellbeing, and inclusion of all.

Kildare Ministries hopes that through our continuous monitoring and oversight of supplier activity, and work with suppliers to ensure there is follow through on action plans and compliance with requirements, they will actively manage and respond to identified slavery risks. We will work with suppliers to ensure continuous improvement in the working conditions of survivors.

When suspicions of modern slavery practices come to our attention through whistle-blower or other channels, KM staff will contact relevant law enforcement agencies.

SECTION FIVE – EFFECTIVENESS

Section 16(1)(e) of the Modern Slavery Act 2018 requires modern slavery statements to describe how the reporting entity assesses effectiveness of its actions.

We utilise the benchmarking and KPI's in the iPRO Modern Slavery Assessment Tool to assess the effectiveness of our actions. As this is the first year we have used the platform to conduct our assessments and due diligence, we will be able to objectively measure the effect when the assessments are completed during the next reporting period

The main KPI's we are using to benchmark our efforts are the risk scores that are generated as part of the assessment process.

Each organisation who completed the assessment questionnaire was assessed and given 2 risk scores.

- Inherent Risk Score
- Unmitigated Risk Score

The Inherent Risk Score measures modern slavery risks that are intrinsic/built-in to the operations of an organisation. This is determined by querying which countries, regions, sectors, and high-risk goods are part of their operations, production, or supply chain.

The Unmitigated Risk Score measures the organisations risk that is still present after accounting for modern slavery risk controls that have been implemented. This is determined by asking suppliers about the policies, processes, and procedures in place to reduce modern slavery risks.

TKM is provided an aggregated risk score of all the assessed suppliers, and we use this aggregated score to measure the risk on an overall supply chain level.

SECTION SIX: CONSULTATION

Section 16(1)(f) of the Modern Slavery Act 2018 requires reporting entities to describe the process of consultation with any entities that the reporting entity owns or controls

During the year, we engaged with the Business and Risk Managers of the schools, Religious Education and Justice Leaders of our schools in carrying out the work and creating awareness relating to modern slavery. A “Kildare Ministries against Modern Slavery” poster was developed and shared with the schools for display. ACRATH and BASP assisted in increasing awareness among our communities.

Schools continue to embrace the opportunities to learn more about the developments in the area and improve their own policies and processes.

All schools participated in the supplier assessment and engagement program we adopted with the assistance of iPRO. An annual survey was conducted to assess the effectiveness of our processes and identify any potential risks.

SECTION SEVEN: ANY OTHER RELEVANT INFORMATION

In all of our ministries, all staff including members of the Executive/Leadership Teams actively give witness to the role of justice. We consider all our staff to be enablers of justice.

Justice is incorporated into the curriculum in our schools using social justice themes. Co-curricular justice programs are integrated and aligned with the whole school approach to justice education. Programmes are strategically planned and allow sufficient time for the development of skills to address issues of injustice and to bring student voice to them. The curriculum is regularly reviewed in consultation with staff and students to include current issues and student voice.

This statement was approved by the Trustees of Kildare Ministries in their capacity as the principal governing body of Kildare Ministries on 19th March 2024.

This statement is signed by Rosemary Copeland and Kathy McEvoy in their roles as Co-Chairs of the Trustees of Kildare Ministries on 19th March 2024.



Rosemary Copeland

19th March 2024



Kathy McEvoy

19th March 2024