

UNITING
SA *Together*
We can



UNITINGSA
MODERN SLAVERY
STATEMENT

FINANCIAL YEAR 2023

CONTENTS

Message from the CEO	3
This Statement	4
About Us	5
Criteria 1: Reporting Entity	6
Criteria 2: Structure, Operations & Supply Chains	8
Criteria 3: Modern Slavery Risks	15
Criteria 4: Actions to address modern slavery risks	18
Criteria 5: Assessing effectiveness of actions taken	23
Criteria 6: Consultation	24
Criteria 7: Looking forward	25

Acknowledgment of Country

UnitingSA acknowledges the Aboriginal and Torres Strait Islander peoples in South Australia as the original and ongoing custodians of the lands and waters on which we all live and work. We recognise their continuing sovereignty and right to self determination. We pay our respects to all Elders – past, present and future – and to all Aboriginal and Torres Strait Islander peoples and communities.



Message from the CEO

Jenny Hall

UnitingSA's purpose is to respond to the needs of communities, families and individuals in order to improve lives. It has been our experience over the past twelve months that there are more "needs" to respond to than ever before.

We live in a society where the challenges of mental health continue to be ever present and growing in complexity. There are more individuals and families than ever before experiencing homelessness and contacting us for assistance. There is a chronic shortage of social and affordable housing options for our community. Our population continues to age rapidly as the "Baby Boomer" generation are now entering the aged care system.

Guided by our vision to provide services that allow all people to flourish, UnitingSA is more committed than ever to delivering services to our community in response to their growing needs. We do not take for granted the importance of the role we are here to play, and are proud to have supported over 12,000 people in the past year.

Not only was continuing to support our community imperative in FY23 due to such challenges, but maintaining the health and safety of our clients, staff and broader community in which we operate a key priority.

Continued pressure from global events such as supply chain disruption and inflation puts pressure on the most vulnerable members in our communities. As such, vulnerability can result in increased instances of modern slavery.

Given our values, UnitingSA is committed to identifying potential risks of modern slavery. UnitingSA is honest regarding the challenges we face as an organisation and that our modern slavery compliance journey must evolve to ensure our systems and processes identify potential risks of modern slavery.

CEO'S MESSAGE

THIS STATEMENT

ABOUT US

CRITERIA 1:
REPORTING ENTITY

CRITERIA 2:
STRUCTURE,
OPERATIONS &
SUPPLY CHAINS

CRITERIA 3: MODERN
SLAVERY RISKS

CRITERIA 4: ACTIONS
TAKEN TO ADDRESS
MODERN SLAVERY
RISKS

CRITERIA 5:
ASSESSING
EFFECTIVENESS OF
ACTIONS TAKEN

CRITERIA 6:
CONSULTATION

CRITERIA 7: LOOKING
FORWARD



This Statement

This modern slavery statement (Statement) is made in accordance with the Modern Slavery Act 2018 (Cth).

This year, we are pleased to publish our third Statement which continues to build on our actions taken.

This Statement is by UnitingSA Ltd and on behalf of the UnitingSA group, which includes UnitingSA Housing Ltd and Wesley Social Enterprises Incorporated.

This Statement was approved by the Board of UnitingSA Ltd on 14 December 2023.

Gael Fraser

UnitingSA Board Chair

CEO'S MESSAGE

THIS STATEMENT

ABOUT US

CRITERIA 1:
REPORTING ENTITY

CRITERIA 2:
STRUCTURE,
OPERATIONS &
SUPPLY CHAINS

CRITERIA 3: MODERN
SLAVERY RISKS

CRITERIA 4: ACTIONS
TAKEN TO ADDRESS
MODERN SLAVERY
RISKS

CRITERIA 5:
ASSESSING
EFFECTIVENESS OF
ACTIONS TAKEN

CRITERIA 6:
CONSULTATION

CRITERIA 7: LOOKING
FORWARD

About Us

UnitingSA is a not-for-profit organisation dedicated to providing compassionate, respectful and just support to a wide range of individuals.

While we focus our direct support towards residents in South Australia, UnitingSA recognises that all organisations also have a responsibility to manage their operations and supply chains to uphold human rights and minimise risks of modern slavery.

Our organisation started from humble beginnings in 1919, when the Methodist Church formed the Port Adelaide Central Methodist Mission.

The 'Port Mission' sought to respond to the material and spiritual needs of the Port Adelaide community amid a devastating worldwide influenza outbreak and the aftermath of the First World War.

Soaring unemployment, chronic illness and poverty plagued the Port and within just a few years the Mission was supporting 80 local families with material aid such as food, clothing and firewood, as well as a range of other practical support, such as linking families with government rations and counselling those in need of solace.

As demand grew, so too did our organisation and in 2003 the Mission became UnitingCare Wesley Port Adelaide. Expansion continued in the following years with people accessing our services from across South Australia. In 2017, this led us to change our name to UnitingSA.

Now more than ever, UnitingSA remains committed to assisting families and individuals living in need, by supporting and promoting their capacity to live a life of personal and economic independence, dignity and social inclusion.

CEO'S MESSAGE

THIS STATEMENT

ABOUT US

CRITERIA 1:
REPORTING ENTITY

CRITERIA 2:
STRUCTURE,
OPERATIONS &
SUPPLY CHAINS

CRITERIA 3: MODERN
SLAVERY RISKS

CRITERIA 4: ACTIONS
TAKEN TO ADDRESS
MODERN SLAVERY
RISKS

CRITERIA 5:
ASSESSING
EFFECTIVENESS OF
ACTIONS TAKEN

CRITERIA 6:
CONSULTATION

CRITERIA 7: LOOKING
FORWARD

Criteria 1: Reporting Entity

This Modern Slavery Statement is made by UnitingSA Ltd ABN 29 335 570 988 on behalf of itself and its subsidiaries.

There are three entities governed by the UnitingSA Board and controlled by the Executive Team, namely:

- **UnitingSA Ltd** ABN 29 335 570 988;
- **UnitingSA Housing Ltd** ABN 57 229 788 559 (UnitingSA Housing); and
- **Wesley Social Enterprises Incorporated** ABN 43 261 657 790 (WSE).

For structural purposes, UnitingSA Housing and WSE can be considered subsidiary organisations of UnitingSA Ltd.

CEO'S MESSAGE

THIS STATEMENT

ABOUT US

**CRITERIA 1:
REPORTING ENTITY**

CRITERIA 2:
STRUCTURE,
OPERATIONS &
SUPPLY CHAINS

CRITERIA 3: MODERN
SLAVERY RISKS

CRITERIA 4: ACTIONS
TAKEN TO ADDRESS
MODERN SLAVERY
RISKS

CRITERIA 5:
ASSESSING
EFFECTIVENESS OF
ACTIONS TAKEN

CRITERIA 6:
CONSULTATION

CRITERIA 7: LOOKING
FORWARD



Criteria 2: Structure, Operations & Supply Chains

OUR STRUCTURE

UnitingSA is a not-for-profit organisation registered with the Australian Charities and Not-for-profits Commission.

UnitingSA is a solely South Australian based public company limited by guarantee with a head office at 70 Dale Street, Port Adelaide.

UnitingSA, UnitingSA Housing and WSE operate under the UnitingSA Board of Directors and are wholly-owned and controlled by the Board and UnitingSA's Executive Team.

These entities are all based in South Australia, with the focus of UnitingSA Housing to build and provide housing to people on low to moderate incomes and WSE to provide supported employment for people living with disability or mental health challenges.

OUR OPERATIONS

UnitingSA has a long and proud history of building stronger communities and supporting South Australians in need.

We deliver services to individuals and communities from more than 30 locations across regional and metropolitan South Australia.

Each year, our team of over 1,000 staff and volunteers touches the lives of more than 12,000 people through the delivery of diverse programs across aged care, housing and community services.

CEO'S MESSAGE

THIS STATEMENT

ABOUT US

CRITERIA 1:
REPORTING ENTITY

**CRITERIA 2:
STRUCTURE,
OPERATIONS &
SUPPLY CHAINS**

CRITERIA 3: MODERN
SLAVERY RISKS

CRITERIA 4: ACTIONS
TAKEN TO ADDRESS
MODERN SLAVERY
RISKS

CRITERIA 5:
ASSESSING
EFFECTIVENESS OF
ACTIONS TAKEN

CRITERIA 6:
CONSULTATION

CRITERIA 7: LOOKING
FORWARD



UnitingSA's impact in FY23:



1584

People received **aged care services**



582

People received support under the **National Disability Insurance Scheme**



803

People accessed **affordable rental accommodation** through UnitingSA Housing



1795

People were assisted through our **employment and training programs**



5864

People were supported by our **child, youth and family programs**



960

People sought help for money matters with our **emergency relief financial counsellors**



1991

People accessed support through our **homelessness services**



1514

No Interest Loans were issued to assist people buy essential items



469

People had their health and wellbeing supported through our **mental health services**



89

People were provided supported employment at **Wesley Social Enterprises**

CEO'S MESSAGE

THIS STATEMENT

ABOUT US

CRITERIA 1:
REPORTING ENTITY

**CRITERIA 2:
STRUCTURE,
OPERATIONS &
SUPPLY CHAINS**

CRITERIA 3: MODERN
SLAVERY RISKS

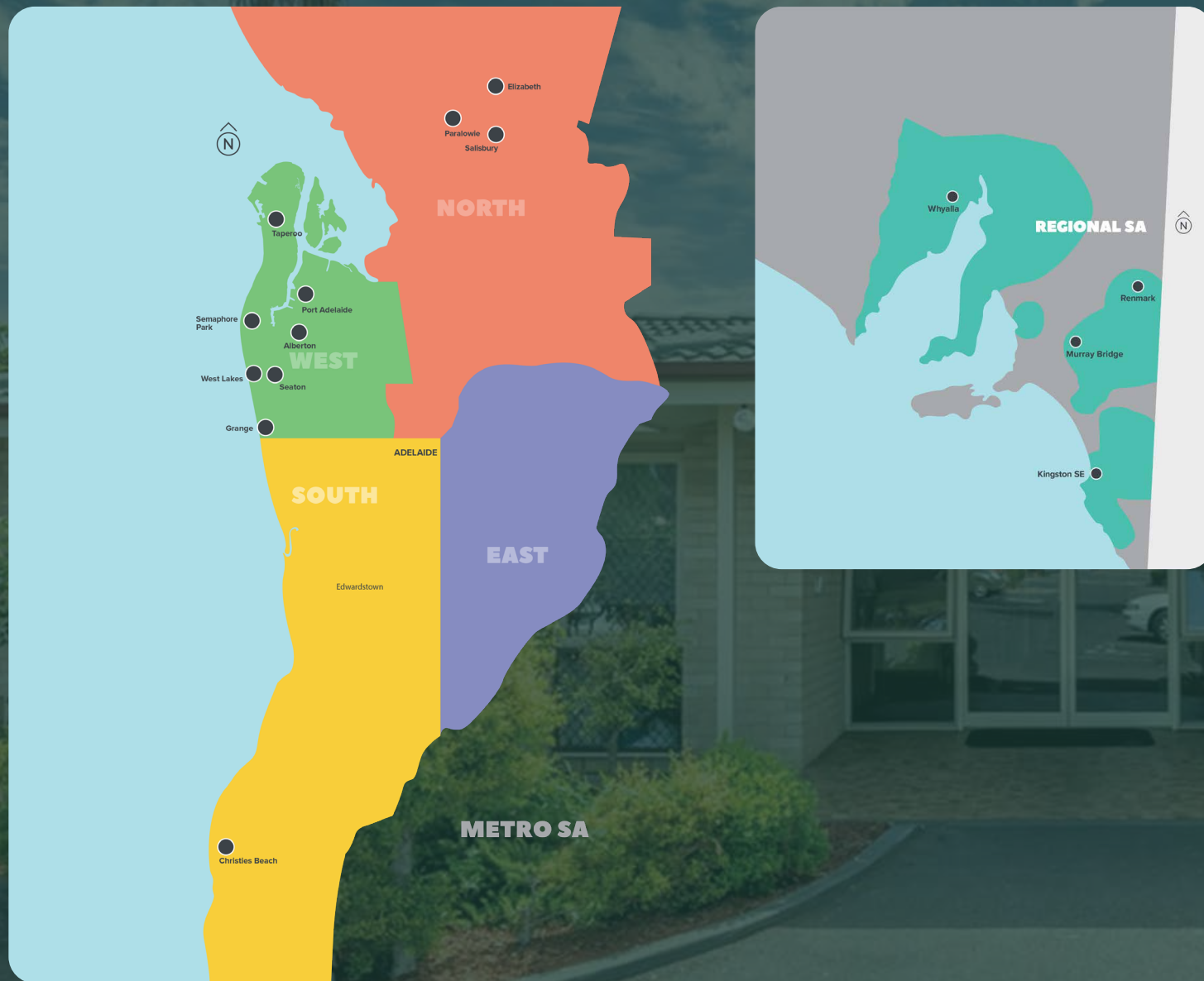
CRITERIA 4: ACTIONS
TAKEN TO ADDRESS
MODERN SLAVERY
RISKS

CRITERIA 5:
ASSESSING
EFFECTIVENESS OF
ACTIONS TAKEN

CRITERIA 6:
CONSULTATION

CRITERIA 7: LOOKING
FORWARD

LOCATION OF OUR OPERATIONS



CEO'S MESSAGE

THIS STATEMENT

ABOUT US

CRITERIA 1:
REPORTING ENTITY

**CRITERIA 2:
STRUCTURE,
OPERATIONS &
SUPPLY CHAINS**

CRITERIA 3: MODERN
SLAVERY RISKS

CRITERIA 4: ACTIONS
TAKEN TO ADDRESS
MODERN SLAVERY
RISKS

CRITERIA 5:
ASSESSING
EFFECTIVENESS OF
ACTIONS TAKEN

CRITERIA 6:
CONSULTATION

CRITERIA 7: LOOKING
FORWARD

AGED CARE

We provide lifestyle, health and care services to more than 1,500 older South Australians through our residential aged care sites, retirement living communities and home care services.

We are also proud to deliver Ethnic Link Services - a statewide federally funded program for older people from diverse cultures.

Our aged care services are delivered across 14 locations in regional and metropolitan South Australia, including five residential aged care sites.

COMMUNITY SERVICES

UnitingSA's community services provide tailored support to meet the unique life experiences and needs of South Australians facing a range of challenges.

We offer programs for children, young people, parents and Aboriginal and Torres Strait Islander peoples.

We support families and individuals to manage household and financial difficulties and walk alongside people on their journey out of homelessness. We assist people to engage with education and training, and help them along their employment pathway.

We also offer support to those living with mental health challenges and help people living with disability to build and maintain their independence.

Our community services are primarily offered across Adelaide's north, west and south, with our mental health programs also occupying a strong presence in the state's regional areas.

UNITINGSA HOUSING

Since 1984, UnitingSA Housing (formerly Portway Housing Association) has been providing affordable rental options for those who need it most.

In FY23, more than 800 people were provided affordable accommodation in 446 UnitingSA Housing properties. While we provide housing across a number of areas in metropolitan Adelaide, most of our housing options are located in the northern and western suburbs.

In FY23, we commenced the development of our latest affordable housing project at Gurr Street in Prospect, which will provide an additional 40 housing opportunities for social and affordable housing residents upon completion, scheduled for August 2024.

WESLEY SOCIAL ENTERPRISES (WSE)

WSE is an NDIS service provider offering meaningful supported employment to people with a disability in both metropolitan and regional South Australia.

Almost 90 supported employees are part of a team of dedicated people delivering a range of products and services to individuals, businesses and government departments.

CEO'S MESSAGE

THIS STATEMENT

ABOUT US

CRITERIA 1:
REPORTING ENTITY

**CRITERIA 2:
STRUCTURE,
OPERATIONS &
SUPPLY CHAINS**

CRITERIA 3: MODERN
SLAVERY RISKS

CRITERIA 4: ACTIONS
TAKEN TO ADDRESS
MODERN SLAVERY
RISKS

CRITERIA 5:
ASSESSING
EFFECTIVENESS OF
ACTIONS TAKEN

CRITERIA 6:
CONSULTATION

CRITERIA 7: LOOKING
FORWARD

OUR SUPPLY CHAINS

To operate our diverse services, UnitingSA requires goods and services from a wide range of suppliers across many sectors. This results in UnitingSA procuring from simple to intricate supply chains. In the reporting period UnitingSA engaged 746 suppliers, ranging from core long term suppliers to smaller supplier engagement, often at the request of clients.

As our operations are based solely in South Australia, UnitingSA is committed to supporting local business. Of our tier 1 suppliers, 75% are based in South Australia and 99.8% in Australia.

In summary, our key areas of engagement include:

- **Labour services** - day-to-day work undertaken at any of our sites, such as plumbing, maintenance, gardening and electrical work. It also includes services by nursing and allied health professionals.
- **Medical supplies** - ranging from defibrillators to monitoring machines.
- **Administration** - such as stationery, printing and other administrative requirements.
- **Consumables (food)** - food and produce purchased directly from wholesalers and retailers. It also includes catering services engaged for events.
- **Apparel and laundry** - linen and uniforms.
- **Facility supplies** - everyday equipment and tools which are used to effectively operate our sites.
- **Electronics** - computers and other electronic systems (including software), which are used in our head office and across our sites.
- **Professional services** - includes advice provided by service providers such as lawyers, accountants and insurers. UnitingSA also engages assistance from independent consultants to maintain and improve efficiency across our operations.

CEO'S MESSAGE

THIS STATEMENT

ABOUT US

CRITERIA 1:
REPORTING ENTITY

**CRITERIA 2:
STRUCTURE,
OPERATIONS &
SUPPLY CHAINS**

CRITERIA 3: MODERN
SLAVERY RISKS

CRITERIA 4: ACTIONS
TAKEN TO ADDRESS
MODERN SLAVERY
RISKS

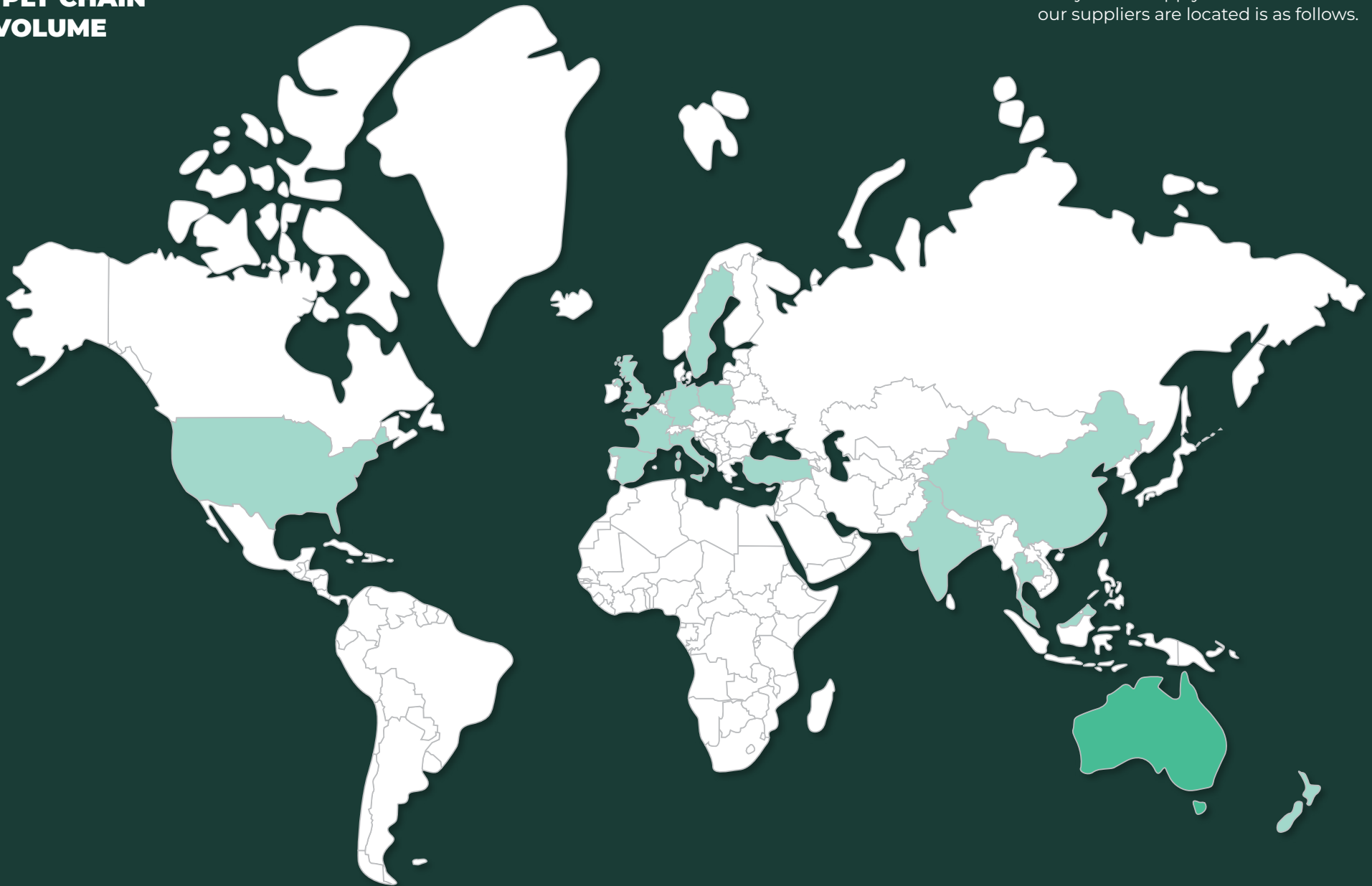
CRITERIA 5:
ASSESSING
EFFECTIVENESS OF
ACTIONS TAKEN

CRITERIA 6:
CONSULTATION

CRITERIA 7: LOOKING
FORWARD

SUPPLY CHAIN BY VOLUME

A summary of our supply chains and where our suppliers are located is as follows.



VOLUME OF SUPPLIERS

0%

0-1%

THAILAND
TURKEY
MALAYSIA

INDIA
CHINA
FRANCE

NETHERLANDS
POLAND
SINGAPORE

SPAIN
SWEDEN
TAIWAN

UNITED KINGDOM
GERMANY
ITALY

NEW ZEALAND
UNITED STATES

>1%

AUSTRALIA - 96%



Criteria 3: Modern Slavery Risks

UnitingSA appreciates that no organisation is immune to modern slavery risks. Challenges present to identify modern slavery risks with global, complex and some instances opaque supply chains.

Risks of modern slavery are multifaceted and UnitingSA takes into consideration modern slavery risk factors such as vulnerable populations, certain goods, services and locations, which all contribute to risk profiling for modern slavery risks.

Informed by resources including but not limited to the Global Slavery Index and the Trafficking In Persons Report 2021, we conduct careful analysis to determine the probability that we might cause, contribute to, or are directly linked to modern slavery through our operations and supply chains.

OPERATIONS

As a South Australian based support services provider, operating in a highly regulated industry and subject to a range of industry specific and broader labour regulations, we consider the risks of modern slavery occurring within our direct operations to be low.

Combined with mechanisms such as strong governance, grievance reporting, whistleblowing and employee assistance programs, we are confident that through training, as well as policies and procedures in

place, the risks of UnitingSA causing modern slavery in our operations are low.

We acknowledge that the use of labour hire to cover staff shortages and to perform tasks such as cleaning can inherently carry a higher risk of modern slavery. We ensure that all labour hire providers engaged are appropriately licensed and that payment made meets legislative requirements. Accordingly, we are confident that our processes relating to the engagement of labour hire providers mitigates the potential modern slavery risks. We will however continually to take steps and due diligence on our labour hire providers.

CONTRIBUTING TO MODERN SLAVERY

While we consider that the risk of contributing to modern slavery via our direct operations are low, we have a wide range of personnel in our organisation who engage suppliers. We appreciate that this may lead to inadvertent or unknown contributors to modern slavery risks. Given this risk and as identified within our previous modern slavery statement, in the reporting period UnitingSA commenced a review of its procurement framework.

BEING DIRECTLY LINKED TO MODERN SLAVERY

UnitingSA has assessed that the most likely modern slavery risks to present to UnitingSA is by being linked to modern slavery through our business relationships, that is our suppliers. This is particularly the case deeper in our supply chains, where we have less leverage, visibility and understanding.

CEO'S MESSAGE

THIS STATEMENT

ABOUT US

CRITERIA 1:
REPORTING ENTITY

CRITERIA 2:
STRUCTURE,
OPERATIONS &
SUPPLY CHAINS

**CRITERIA 3: MODERN
SLAVERY RISKS**

CRITERIA 4: ACTIONS
TAKEN TO ADDRESS
MODERN SLAVERY
RISKS

CRITERIA 5:
ASSESSING
EFFECTIVENESS OF
ACTIONS TAKEN

CRITERIA 6:
CONSULTATION

CRITERIA 7: LOOKING
FORWARD

Through our risk matrixing and assessments, we consider the following presents higher risks of modern slavery to UnitingSA:

CATEGORY	MODERN SLAVERY RISKS
PERSONAL PROTECTIVE EQUIPMENT (PPE)	PPE is often single use and produced in significant volumes with pressure to manufacture. PPE is produced in locations that are identified as higher risk for modern slavery, poor working conditions, forced labour and excessive working hours.
CLEANING	Cleaning is exposed to modern slavery risks due to unskilled labour, migrant workers, recruitment behaviour and debt bondage. The industry frequently subcontracts which contributes to less visibility.
LINEN	Cotton is identified as a high risk commodity for modern slavery risks. Therefore, risks of modern slavery in connection with linen may present deeper in our supply chains. With complex supply chains, subcontracting, it hinders oversight to identify modern slavery risks.
PRODUCE & FOOD	Certain produce and foods are at higher risks of modern slavery, for example, the horticulture industry, seafood, rice and cocoa.
CONSTRUCTION & MAINTENANCE	The raw materials involved in construction present a risk to UnitingSA. Instances of debt bondage, poor conditions and temporary work has been exposed in the construction industry. UnitingSA is of the view that potential modern slavery risks in connection with construction and maintenance would likely present deeper in UnitingSA's supply chains.
ELECTRONICS	High demand, complex supply chains and high risk raw materials contribute to electronics been assessed as high risk. Although UnitingSA's leverage over electronics suppliers may be limited, UnitingSA is aware that forced labour, debt bondage and other slavery practices have been reported in connection with electronics.

Based on our analysis to date, Uniting SA has commenced identifying risk deeper in our supply chains, as summarised below.

CEO'S MESSAGE

THIS STATEMENT

ABOUT US

CRITERIA 1:
REPORTING ENTITY

CRITERIA 2:
STRUCTURE,
OPERATIONS &
SUPPLY CHAINS

**CRITERIA 3: MODERN
SLAVERY RISKS**

CRITERIA 4: ACTIONS
TAKEN TO ADDRESS
MODERN SLAVERY
RISKS

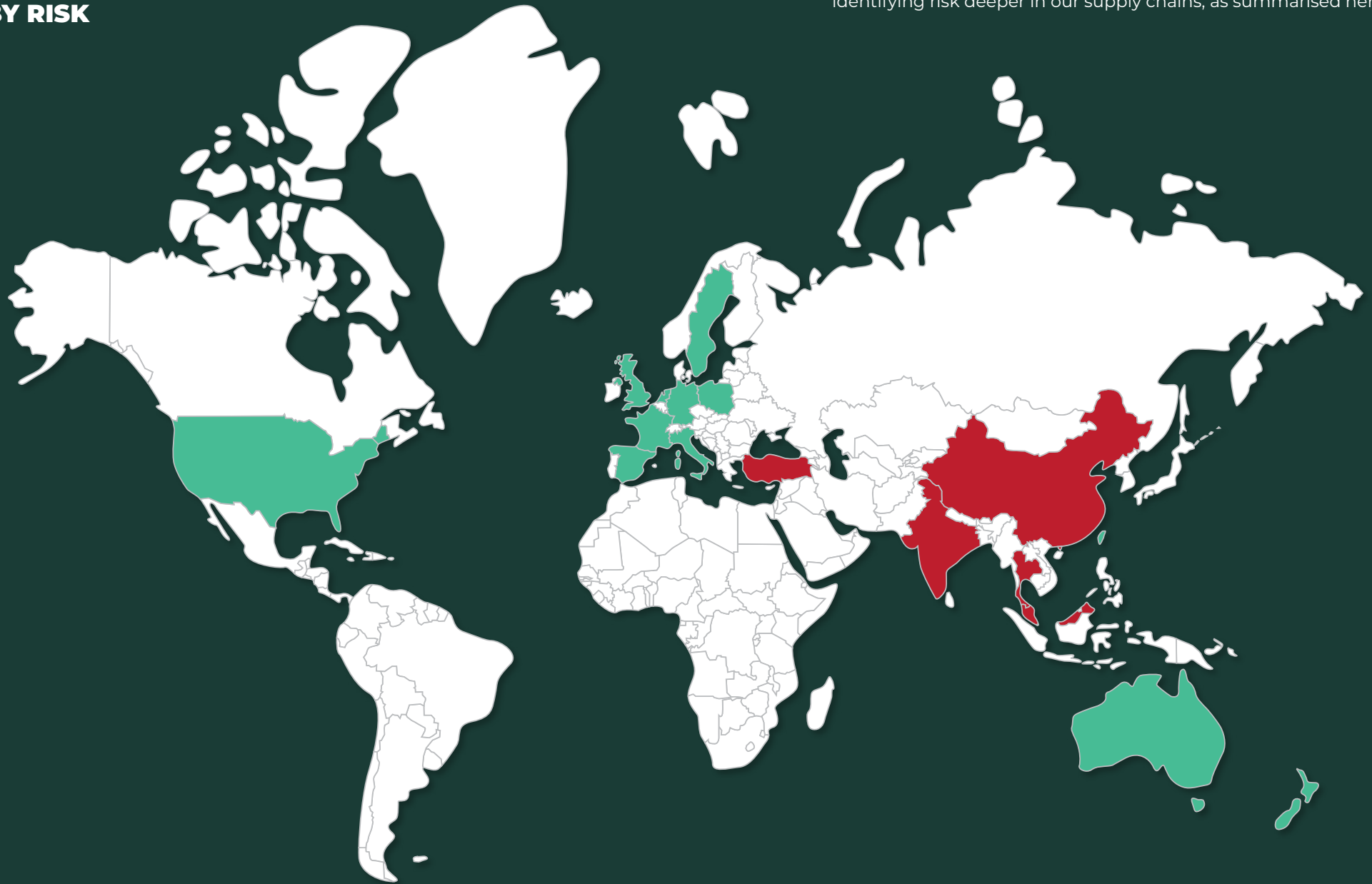
CRITERIA 5:
ASSESSING
EFFECTIVENESS OF
ACTIONS TAKEN

CRITERIA 6:
CONSULTATION

CRITERIA 7: LOOKING
FORWARD

SUPPLY CHAIN BY RISK

Based on our analysis to date, Uniting SA has commenced identifying risk deeper in our supply chains, as summarised here.



RISK ANALYSIS

**LOW
RISK**

AUSTRALIA
FRANCE
NETHERLANDS

POLAND
SINGAPORE
SPAIN

SWEDEN
TAIWAN
GERMANY

ITALY
NEW ZEALAND

UNITED KINGDOM
UNITED STATES

**HIGH
RISK**

THAILAND
TURKEY
MALAYSIA

INDIA
CHINA

Criteria 4: Actions to address modern slavery risks

As the previous reporting period was UnitingSA's first reporting period, a significant focus of our actions was to implement a modern slavery compliance framework, which would serve as our foundation for compliance going forward.

Key components of our modern slavery framework are as follows:

ACTION	DESCRIPTION
RESPONSIBILITY	The CFO was appointed as responsible for UnitingSA's modern slavery framework, including the responsibility to report progress and risk to the Board.
GUIDANCE	UnitingSA has collaborated with a third party to provide us with guidance including implementation on our framework and assisting with action. As a not for profit, UnitingSA's resources are limited and appointing a third party has been critical to drive our compliance framework forward.
DIGITAL PLATFORM	<p>In the first reporting period UnitingSA launched its "Supplier Platform". The purpose of the platform is to allow us to track risk, screen, conduct due diligence on third parties including the issuing of questionnaires, risk scoring, auditing, engaging with our suppliers including issuing training and corrective action plans. The system is fully auditable, generating reports to streamline reporting.</p> <p>During this reporting period, we continued to tweak the reporting and processes on the Supplier Platform. Whilst establishing and setting up suppliers on the Supplier Platform was a critical step in the first reporting period, maintaining year on year data has allowed UnitingSA to build a strong and comprehensive risk profile on all of its suppliers.</p>
POLICY & PROCEDURES	<p>Policies and procedures including a Modern Slavery Policy, Procurement Policy, Whistleblower Policy and Supplier Code of Conduct set out the framework for compliance. Such policies and procedures set out mechanisms for reporting concerns but also our requirements for modern slavery training, requirements for due diligence and expectations regarding suppliers.</p> <p>During the reporting period, UnitingSA revisited its overall policy suite as well as its broader supplier engagement framework.</p>

CEO'S MESSAGE

THIS STATEMENT

ABOUT US

CRITERIA 1:
REPORTING ENTITY

CRITERIA 2:
STRUCTURE,
OPERATIONS &
SUPPLY CHAINS

CRITERIA 3: MODERN
SLAVERY RISKS

**CRITERIA 4: ACTIONS
TAKEN TO ADDRESS
MODERN SLAVERY
RISKS**

CRITERIA 5:
ASSESSING
EFFECTIVENESS OF
ACTIONS TAKEN

CRITERIA 6:
CONSULTATION

CRITERIA 7: LOOKING
FORWARD

CONTRACTING

We set out our expectations on third parties via contractual arrangements, including implementation of a modern slavery contract clause as drafted by a third party.

PROCUREMENT FRAMEWORK

During the reporting period, UnitingSA in conjunction with third party guidance worked through an overhaul to its supplier engagement process. As a large organisation across multiple streams and many locations, the current procurement process was identified as a potential for modern slavery risks due to retrospective due diligence being conducted in several instances. This format also results in unnecessary increase in risk due to the volume of suppliers that are being engaged.

As a result, UnitingSA has overhauled its procurement processes to allow a more streamlined approach and ensuring that all sites can obtain the necessary goods and services whilst using suppliers that meet UnitingSA's desired risk profile.

UnitingSA have spent considerable time and resources scoping the current process and ensuring that the procurement framework moving forward helps not only to mitigate modern slavery risks but also to ensure that procurement remains accessible for all sites to ensure functionality at all times.

This framework is expected to be rolled out to all sites in FY24, along with a training program that provides all involved in procurement with context as to why this change is going ahead.

Many of the initiatives described above were launched in our first reporting period and implemented in the reporting period as addressed by this Statement. Therefore, the focus of this reporting period is to continue to develop and assess the effectiveness of these systems.

Across the industries that UnitingSA cover, being able to quickly and efficiently arrange for the engagement of suppliers to assist people we work with is essential to our overall model. Accordingly, establishing a framework that allows for de-centralised procurement to still have the required oversight has taken a considerable amount of time across many areas of the business. UnitingSA has formed the view that taking additional time to ensure that the new framework is robust is integral to the success of its roll out. The additional time and energy put into amendments and discussions regarding the procurement framework limited some of the forward progress during this reporting period.

Notwithstanding this, UnitingSA continued to commit to key initiatives in accordance with the framework summarised above with key actions and outcomes described below.

CEO'S MESSAGE

THIS STATEMENT

ABOUT US

CRITERIA 1:
REPORTING ENTITY

CRITERIA 2:
STRUCTURE,
OPERATIONS &
SUPPLY CHAINS

CRITERIA 3: MODERN
SLAVERY RISKS

**CRITERIA 4: ACTIONS
TAKEN TO ADDRESS
MODERN SLAVERY
RISKS**

CRITERIA 5:
ASSESSING
EFFECTIVENESS OF
ACTIONS TAKEN

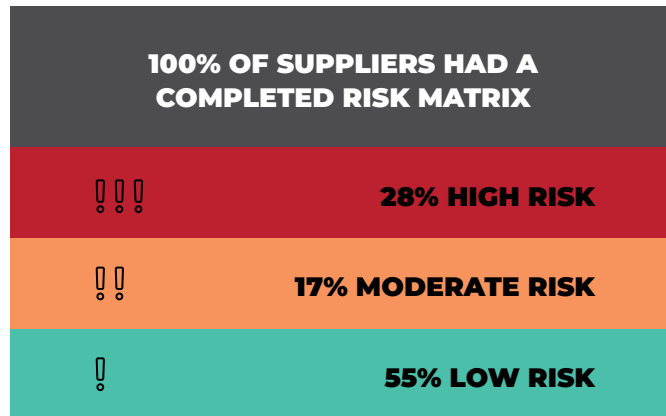
CRITERIA 6:
CONSULTATION

CRITERIA 7: LOOKING
FORWARD

DUE DILIGENCE

SUPPLIER RISK ASSESSMENT

In accordance with UnitingSA's risk assessment matrix:

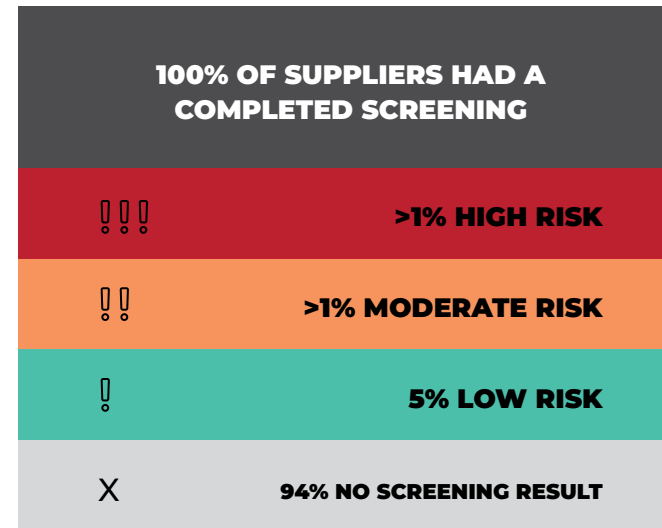


SUPPLIER SCREENINGS

UnitingSA screens every supplier, via a third party database, for modern slavery risks. UnitingSA also screens for other risks including sanctions, bribery and corruption and modern slavery indicators such as underpayment.

By screening for broader risks, UnitingSA can identify suppliers who may need to be prioritised for due diligence.

The results of our screenings are as follows:



¹ Suppliers are screened against the following areas:

Integrity risks – corruption and bribery, serious and organised crime, terror, anti-competitive behaviour, government connections, fraud, money laundering, tax non-compliance and sanctions

Environmental, social and governance risks – modern slavery, animal welfare, sales and marketing practices, health and safety, human rights, environmental degradation, employment practices, governance and management, regulatory enforcement

Data and cyber risks – intellectual property, personal data privacy, data security

Operational and quality risks – industry presence, product and service quality, operational quality and business continuity

Identity risks – transparency, source of wealth

Financial risks – financial stability, financial irregularities

CEO'S MESSAGE

THIS STATEMENT

ABOUT US

CRITERIA 1:
REPORTING ENTITY

CRITERIA 2:
STRUCTURE,
OPERATIONS &
SUPPLY CHAINS

CRITERIA 3: MODERN
SLAVERY RISKS

**CRITERIA 4: ACTIONS
TAKEN TO ADDRESS
MODERN SLAVERY
RISKS**

CRITERIA 5:
ASSESSING
EFFECTIVENESS OF
ACTIONS TAKEN

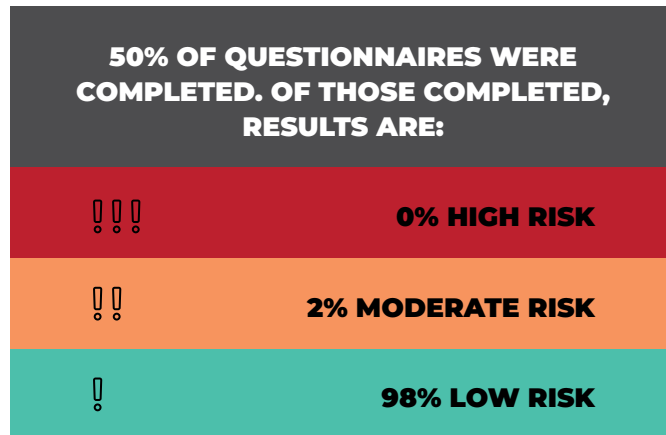
CRITERIA 6:
CONSULTATION

CRITERIA 7: LOOKING
FORWARD

QUESTIONNAIRES

Direct engagement and collaboration with our suppliers are a key component of our due diligence framework. As such, UnitingSA has a questionnaire which we use to gather information from our suppliers regarding risks of modern slavery in their organisation or supply chains (therefore deeper in our supply chains).

A summary of the results from our questionnaire are as follows:



OUTCOMES OF DUE DILIGENCE

To date, we have not identified instances of modern slavery in our operations or supply chains. However, UnitingSA is of the view that risks are more likely to present deeper in our supply chains.

In the previous reporting period, we highlighted steps that UnitingSA has taken as a result of the due diligence outcomes. Such steps included training and engagement with suppliers to assist them in understanding modern slavery risks and how to mitigate these risks in their own operations and supply chains.

In the subsequent reporting period, UnitingSA intends to conduct more focussed due diligence on the higher risk suppliers that provide goods or services that are more susceptible to modern slavery deeper in their supply chains.

The Supplier Platform allows UnitingSA to communicate directly with all of its tier 1 suppliers. This will assist UnitingSA to maintain and continue to build on its strong relationships with suppliers and enable further due diligence to be conducted where necessary.

EMPLOYEE TRAINING

UnitingSA acknowledges the importance of training all procurement employees on modern slavery. Given the industries that UnitingSA works across, we have formed the view that many of the workers are required to undertake significant amounts of training. Whilst UnitingSA acknowledges the importance of modern slavery training, the intention is for the training to be targeted at the people who are responsible for engagement and procurement to ensure that they understand UnitingSA's procurement principles and intention to mitigate risks of modern slavery appearing in UnitingSA's operations and supply chains.

CEO'S MESSAGE

THIS STATEMENT

ABOUT US

CRITERIA 1:
REPORTING ENTITY

CRITERIA 2:
STRUCTURE,
OPERATIONS &
SUPPLY CHAINS

CRITERIA 3: MODERN
SLAVERY RISKS

CRITERIA 4: ACTIONS
TAKEN TO ADDRESS
MODERN SLAVERY
RISKS

CRITERIA 5:
ASSESSING
EFFECTIVENESS OF
ACTIONS TAKEN

CRITERIA 6:
CONSULTATION

CRITERIA 7: LOOKING
FORWARD



Criteria 5: Assessing effectiveness of actions taken

UnitingSA is particularly aware that implementing mechanisms to identify gaps for improvement is critical. Our modern slavery compliance framework is at the beginning of its journey and UnitingSA identifies key areas for improvement in the next reporting period. This includes:

- **review of our procurement practices and conducting due diligence early or before engagement of third parties connected to us;**
- **strengthening of our policies and procedures and in particular our procurement policy;**
- **increasing education with our suppliers;**
- **prioritisation of supply chain tracing on higher risk supply chains based on risk assessment;**
- **rolling out modern slavery training for employees.**

In addition, in the reporting period we engaged a third party to review our modern slavery framework, including the identification of gaps in our processes and systems. Such review is critical to ensure objectiveness and identify areas for improvement. The third party issued UnitingSA with considerations to strengthen our modern slavery compliance framework. The significant body of work with reviewing our procurement framework resulted from such reviews.

CEO'S MESSAGE

THIS STATEMENT

ABOUT US

CRITERIA 1:
REPORTING ENTITY

CRITERIA 2:
STRUCTURE,
OPERATIONS &
SUPPLY CHAINS

CRITERIA 3: MODERN
SLAVERY RISKS

CRITERIA 4: ACTIONS
TAKEN TO ADDRESS
MODERN SLAVERY
RISKS

**CRITERIA 5:
ASSESSING
EFFECTIVENESS OF
ACTIONS TAKEN**

CRITERIA 6:
CONSULTATION

CRITERIA 7: LOOKING
FORWARD



Criteria 6: Consultation

This Statement is submitted by UnitingSA Ltd on behalf of the UnitingSA group. The statistics, figures and analysis described in this Statement is by the UnitingSA group.

The UnitingSA group is governed by the same executive team and Board. To that end, consultation across the group as extensive and collaboration required from various teams, from the executive, to procurement to the accounts department. Training and engagement are required from the entire UnitingSA group.

The Board has general oversight of the collaboration process. The CFO has responsibility for day to day operations of the UnitingSA group modern slavery framework. Policies, procedures and codes in connection with modern slavery and ancillary policies such as procurement are for the UnitingSA group.

CEO'S MESSAGE

THIS STATEMENT

ABOUT US

CRITERIA 1:
REPORTING ENTITY

CRITERIA 2:
STRUCTURE,
OPERATIONS &
SUPPLY CHAINS

CRITERIA 3: MODERN
SLAVERY RISKS

CRITERIA 4: ACTIONS
TAKEN TO ADDRESS
MODERN SLAVERY
RISKS

CRITERIA 5:
ASSESSING
EFFECTIVENESS OF
ACTIONS TAKEN

**CRITERIA 6:
CONSULTATION**

CRITERIA 7: LOOKING
FORWARD



Criteria 7: Looking forward

UnitingSA continues to navigate issues relating to supply chain disruption, inflation and global pressures impacting our organisation. Notwithstanding this, UnitingSA is genuinely committed to addressing and identify risks of modern slavery.

We strive to improve our processes and systems as reflected in this Statement, with many areas and initiatives identified for improvement in the next reporting period.

CEO'S MESSAGE

THIS STATEMENT

ABOUT US

CRITERIA 1:
REPORTING ENTITY

CRITERIA 2:
STRUCTURE,
OPERATIONS &
SUPPLY CHAINS

CRITERIA 3: MODERN
SLAVERY RISKS

CRITERIA 4: ACTIONS
TAKEN TO ADDRESS
MODERN SLAVERY
RISKS

CRITERIA 5:
ASSESSING
EFFECTIVENESS OF
ACTIONS TAKEN

CRITERIA 6:
CONSULTATION

**CRITERIA 7: LOOKING
FORWARD**

UNITING
SA *Together*
We can

THANK YOU

