

UNITING
SA *Together*
We can

UNITINGSA
FY24 MODERN SLAVERY
STATEMENT



CONTENTS

About Us	3
Message from the CEO	4
This Statement	5
Criteria 1: Reporting Entity	6
Criteria 2: Structure, Operations & Supply Chains	7
Criteria 3: Modern Slavery Risks	13
Criteria 4: Actions to address modern slavery risks	18
Criteria 5: Assessing effectiveness of actions taken	22
Criteria 6: Consultation	23
Criteria 7: Looking forward	24

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.

About Us

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

UnitingSA 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.

At UnitingSA everyone is valued - vulnerable young people, adults and families, people with mental health disabilities, individuals seeking employment and those from culturally and linguistically diverse backgrounds are just some of the people who are assisted every day.

While we focus our direct support towards residents in South Australia, UnitingSA recognises that we, like all organisations, have a responsibility to manage our operations and supply chains in a way that upholds human rights and minimises the risks of modern slavery.

CEO'S MESSAGE

THIS STATEMENT

ABOUT US

CRITERIA 1:
REPORTING ENTITY

CRITERIA 2:
STRUCTURE,
OPERATIONS &
SUPPLY CHAINS

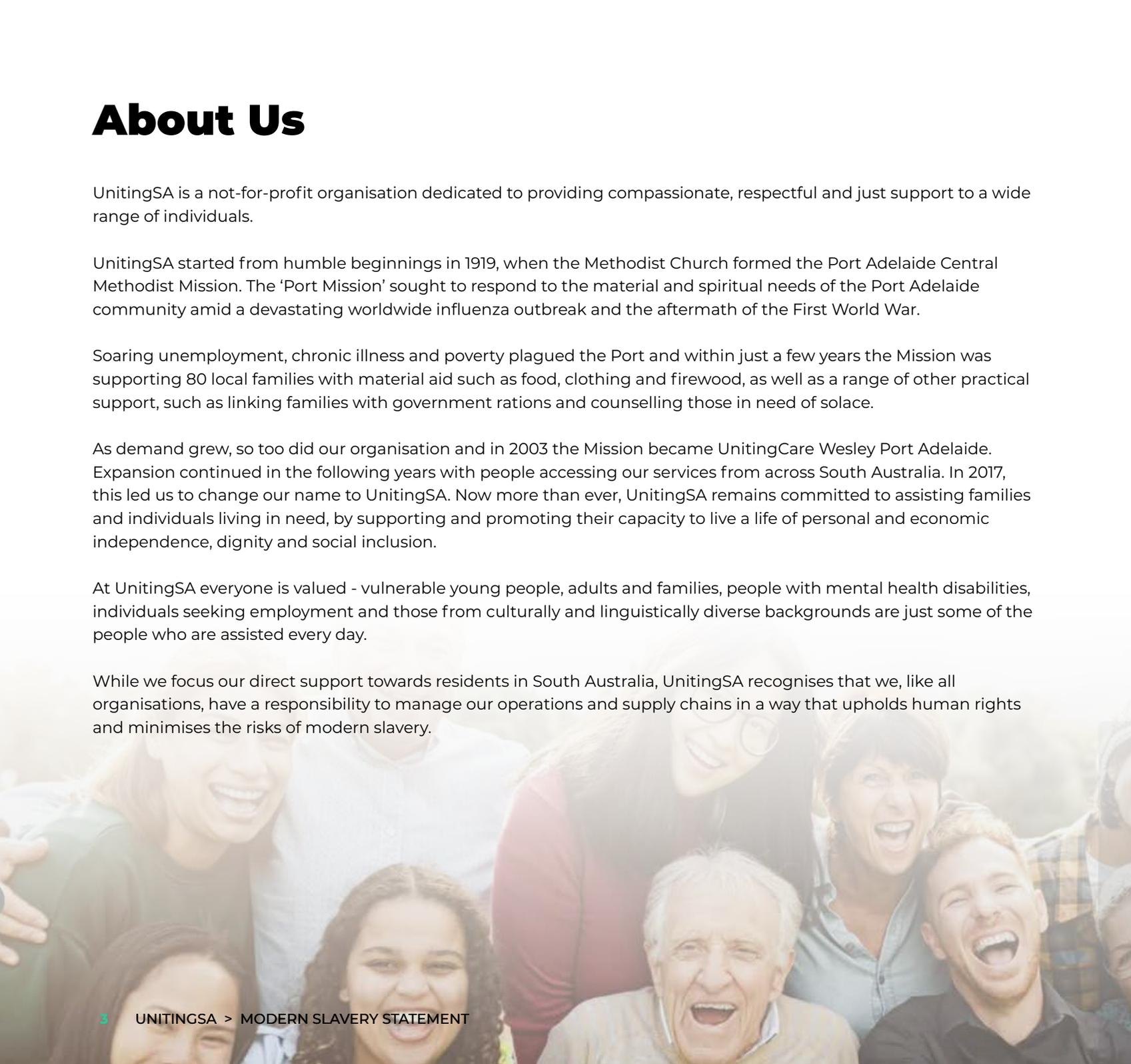
CRITERIA 3: MODERN
SLAVERY RISKS

CRITERIA 4: ACTIONS
TAKEN TO ADDRESS
MODERN SLAVERY
RISKS

CRITERIA 5:
ASSESSING
EFFECTIVENESS OF
ACTIONS TAKEN

CRITERIA 6:
CONSULTATION

CRITERIA 7: LOOKING
FORWARD





Message from the CEO

Jenny Hall

UnitingSA plays an important role in providing vital services to the community. The cost-of-living crisis has left many individuals and families under significant financial pressure and more vulnerable to homelessness. These financial pressures in turn create their own emotional pressures, meaning that mental health continues to be a prevalent concern.

Accordingly, the social and affordable housing services that we provide are more in demand than ever. Construction started on our affordable housing project in Devonport Terrace in Prospect which will provide an additional 40 affordable and social housing opportunities. In December 2023, we announced another affordable housing solution in Second Street in Bowden to provide 70 additional rental and for-sale apartments to this much needed segment of the housing market. During the reporting period, we also celebrated the new home of our Community Services offering in Whyalla which now accommodates UnitingSA's Mental Health, NDIS and Wesley Social Enterprises offering for the region.

Our vision is to provide services that allow all people to flourish. The cost-of-living-crisis and the current focus on the importance of affordable housing has reiterated the important role that we play in supporting our community.

Our business and our sector in general has been subject to increasing demands from broader compliance, corporate governance and operational requirements. This has placed constraints on our workforce who have had to juggle competing compliance requirements during this reporting period.

Despite this, we have continued to respond at both a grassroots and national level. Partnerships, such as the Adelaide North West Homelessness Alliance, enable us to have a real impact in supporting people facing homelessness in our local communities. We have been contracted to remain a key provider of mental health support services across South Australia for an additional 8 years and we have worked at a federal level, partnering with UnitingCare Australia agencies across the country, to advocate for long-overdue aged care reform.

Whilst we have a full agenda, our commitment to operating in a socially responsible manner is unwavering. UnitingSA remains committed to continue undertaking actions to identify and mitigate modern slavery risks in our operations and supply chains, which is reflected in this modern slavery statement.

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) (“**Act**”) for the reporting period of 1 July 2023 to 30 June 2024.

This Statement has been prepared by UnitingSA Ltd (“**UnitingSA**”) and its subsidiaries: UnitingSA Housing Ltd and Wesley Social Enterprises Incorporated (“collectively, the “**UnitingSA Group**”). This is our fourth Statement which outlines the actions undertaken in this reporting period.

This Statement was approved by the Board of UnitingSA on 19 December 2024.

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

Criteria 1: Reporting Entity

This Statement is made by UnitingSA Ltd ABN 29 335 570 988 on behalf of itself and the UnitingSA Group.

There are three (3) entities governed by the UnitingSA Board and controlled by the Executive Team, namely:

- **UnitingSA Ltd** ABN 29 335 570 988 (“**UnitingSA**”);
- **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 entities of UnitingSA.

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 1,200 staff and volunteers touch the lives of more than 12,500 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

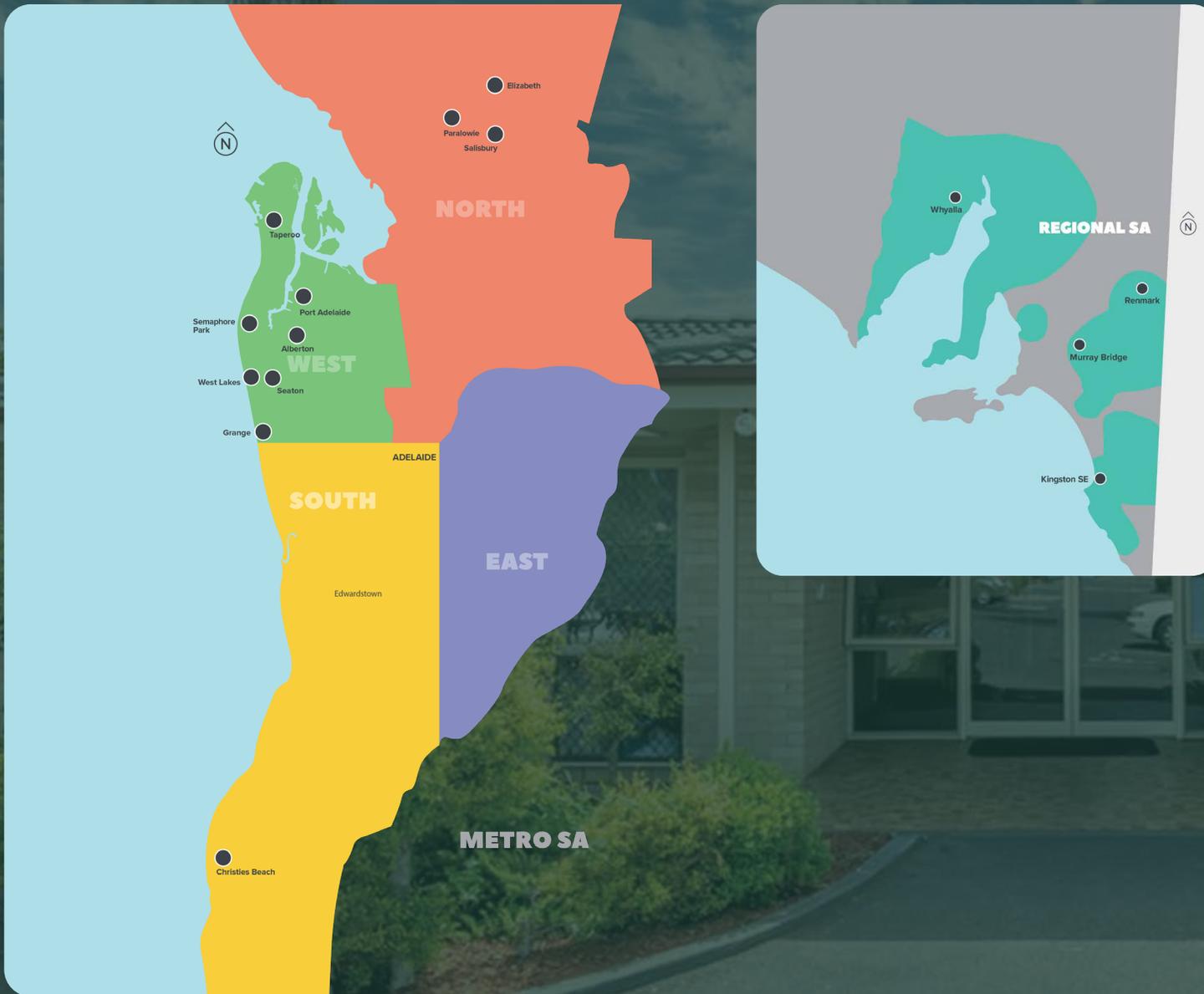
CRITERIA 4: ACTIONS
TAKEN TO ADDRESS
MODERN SLAVERY
RISKS

CRITERIA 5:
ASSESSING
EFFECTIVENESS OF
ACTIONS TAKEN

CRITERIA 6:
CONSULTATION

CRITERIA 7: LOOKING
FORWARD

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

OUR SERVICES

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 proud to be delivering a growing level of service to South Australians who choose to age in place, with a continued focus on delivering services to a client cohort of diverse cultures and language groups.

Our aged care services are delivered across 14 locations in regional and metropolitan South Australia, including 5 residential aged care sites.

COMMUNITY SERVICES

UnitingSA's community services provide tailored support to meet the unique life experiences and needs of South Australian's 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 known as Portway Housing Association) has been providing affordable rental options to those who need it most.

In FY24, more than 800 people were provided affordable accommodation in 452 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.

During FY23, we commenced the development of a new affordable housing project in Devonport Terrace in Prospect which will provide an additional 40 affordable housing opportunities. It is expected that the site will welcome its first residents in late 2024.

In FY24, we started work a new affordable housing solution in Second Street, Bowden called "Uniting on Second" which will contain 46 affordable rentals and 24 affordable apartments for sale. Construction is expected to be completed in December 2025.

WESLEY SOCIAL ENTERPRISES (WSE)

WSE is a NDIS service provider which offers meaningful supported employment opportunities to people with a disability in both metropolitan and regional South Australia. We have around 70 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 IMPACT

 **1502** People received **aged care services**

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

 **2146** People were supported by our **child, youth and family programs**

 **1455** People accessed support through our **homelessness services**

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

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

 **1350** People were assisted through our **employment and training programs**

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

 **1755** **No Interest Loans** were issued to assist people buy essential items

 **84** 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

OUR SUPPLY CHAINS

To enable us to operate our diverse range of services, UnitingSA acquires goods and services from a wide range of suppliers across various sectors. Accordingly, we procure from a range of suppliers who have simple supply chains and suppliers who have intricate supply chains.

During this reporting period, we engaged with 581 suppliers. This includes a range of core, long-term suppliers and smaller, shorter-term suppliers, who are often engaged at the request of our clients.

As our operations are solely based in South Australia, UnitingSA is committed to supporting local, South Australian businesses. Out of our Tier 1 suppliers, 73% are based in South Australia and 99.6% are based in Australia.

Our key supply chains that we engage are as follows:

- **Labour services** - our labour services suppliers are involved in the day-to-day work undertaken at our sites, including plumbing, maintenance, gardening and electrical work. This category also includes suppliers who provide nursing and allied health professionals.
- **Medical supplies** - including supplies such as defibrillators and monitoring machines.
- **Administration** - including supplies such as stationery, printing and other administrative supplies.
- **Food consumables** - food and produce purchased directly from wholesalers and retailers as well as catering services which are engaged for events.
- **Apparel and laundry** - linen and laundry suppliers.
- **Facility supplies** - everyday equipment and tools which are used to operate our sites effectively.
- **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.

We also engage advice from independent consultants to maintain and improve efficiencies 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

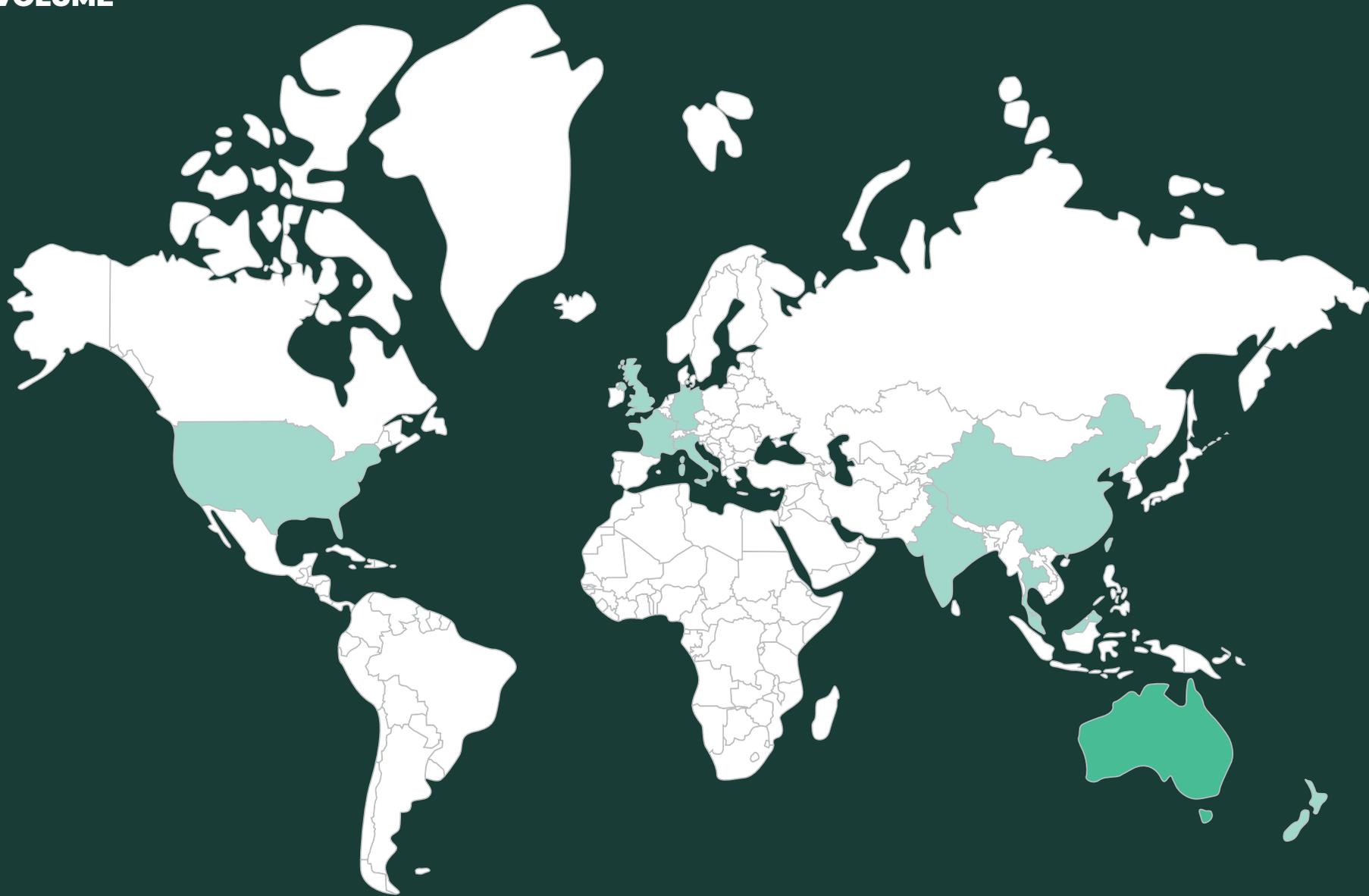
CRITERIA 5:
ASSESSING
EFFECTIVENESS OF
ACTIONS TAKEN

CRITERIA 6:
CONSULTATION

CRITERIA 7: LOOKING
FORWARD

SUPPLY CHAIN BY VOLUME

A summary of our supply chains and where our suppliers are located (which includes Tier 1, Tier 2 and raw materials suppliers) is as follows.



VOLUME OF SUPPLIERS

0%

0-1%

THAILAND
MALAYSIA
INDIA

CHINA
FRANCE
SINGAPORE

TAIWAN
UNITED
KINGDOM

GERMANY
ITALY

NEW ZEALAND
UNITED STATES

>1%

AUSTRALIA - 95.54%

Criteria 3: Modern Slavery Risks

UnitingSA appreciates that no organisation is immune to the risks of modern slavery, with factors such as globalised supply chains presenting difficulties with identifying and mitigating modern slavery risks.

Modern slavery risks are multifaceted. When assessing modern slavery risks, UnitingSA takes into consideration factors such as vulnerable populations as well as high risk goods, services and locations when risk profiling our supply chains for modern slavery risk.

Our risk assessment is guided by internationally recognised resources such as the Global Slavery Index 2023 and utilises the “cause, contribute to or directly linked to” framework from the United Nations Guiding Principles on Business and Human Rights. Using this methodology, we are able to understand the risks of causing, contributing to or being directly linked to modern slavery through our operations and supply chains.



CAUSE

Modern slavery that an entity causes itself via its activities and / or omissions which results in harm.

For example, employing children in a production factory.



CONTRIBUTE TO

Modern slavery that an entity contributes to via activities or contributions that facilitate, enable or incentivise harm.

For example, placing tight lead times on orders from a supplier which leads to the employment of underage workers to meet the tight lead times.



DIRECTLY LINKED TO

Modern slavery that an entity is linked to via its products, services or business relationships.

For example, engaging a supplier that is later discovered to engage underage workers in its factory.

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

OPERATIONAL RISKS

As a South Australian-based support services provider, we operate in a highly regulated industry and are subject to a range of industry specific and broader labour regulations.

We have implemented strong governance mechanisms such as grievance reporting, whistleblower reporting and employment assistance programs as part of our broader corporate governance program. To accompany this, we have a strong policy and procedure suite which acts as the foundation of our overarching corporate governance framework. Through our corporate governance mechanisms, our training programs and our policy and procedure framework, we consider the risks of modern slavery occurring within our direct operations to be low.

We acknowledge that the use of labour hire to cover staff shortages and to perform tasks such as cleaning, which is an industry that carries heightened modern slavery risks, can carry a higher risk of modern slavery. To help mitigate this risk, we ensure that all labour hire providers that are engaged are appropriate licensed and that payments made to these suppliers meet legislative requirements. We will continue to monitor labour hire providers.

“CONTRIBUTING TO” MODERN SLAVERY

Overall, we consider the risk of UnitingSA to be “contributing to” modern slavery to be low. However, as we have a wide range of personnel engaging with suppliers, we appreciate that this may lead to inadvertent or unknown contributors which may heighten our modern slavery risk.

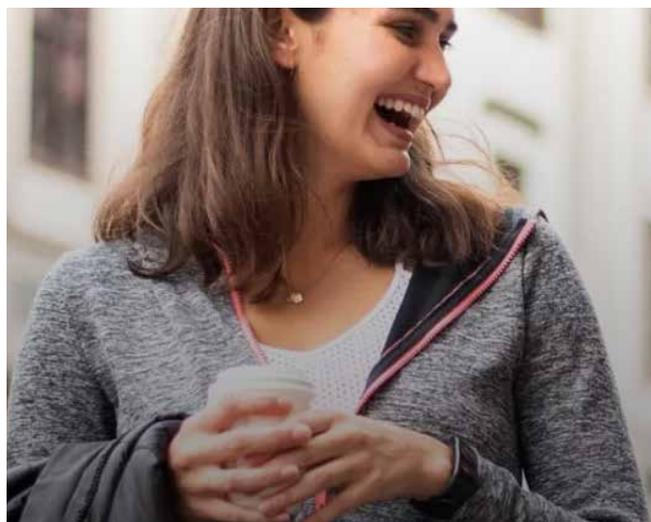
In light of this risk, during the previous reporting period, UnitingSA commenced a review of its procurement framework and identified risks coming from:

- retrospective due diligence being conducted; and
- the volume of suppliers being engaged across UnitingSA.

Further details about the outcome of this procurement framework review are outlined in Criteria 4 below.

“DIRECTLY LINKED TO” MODERN SLAVERY

UnitingSA have assessed that the most likely modern slavery risks for UnitingSA is being linked to modern slavery through our business relationships (i.e., our supply chains). We consider that this risk becomes more prevalent as you dive deeper into supply chains where visibility and control over these supply chains decreases.



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 RISKS

Utilising our risk matrix (which is described further in Criteria 4 below) and the “cause, contribute to and directly linked to” framework, we consider the following supply chains present high risks of modern slavery to UnitingSA:

CATEGORY	MODERN SLAVERY RISKS
PERSONAL PROTECTIVE EQUIPMENT (PPE)	PPE is often single use and is produced in significant volumes in high-pressure manufacturing environments. Often, PPE is produced in locations that are identified as high-risk locations for modern slavery and may have a higher prevalence of poor working conditions, forced labour and excessive working hours. For example, PPE from Malaysia carries heightened modern slavery risks due to findings of forced labour in medical glove manufacturing facilities in Malaysia in 2021.
SOLAR PANELS	Solar panels, in particular the key raw material polysilicon, have heightened modern slavery risks, particularly when sourced from certain jurisdictions such as the Xinjiang Uyghur Autonomous Region (“Xinjiang”) in China.
CLEANING	The cleaning industry has heightened modern slavery risks due to the increased prevalence of unskilled labour, migrant workers, deceptive recruitment and debt bondage in the industry. Furthermore, the industry tends to rely on sub-contracting arrangements, contributing to less visibility and control over the labour arrangements with these suppliers.
LINEN & COTTON	Linen and cotton have been identified as high-risk commodities for modern slavery, particularly when connected with high-risk jurisdictions. These supply chains are also very complex, with many parties involved in the extraction, production and manufacture of these raw materials. The complexities of these supply chains increase the modern slavery risk of these commodities.

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

CATEGORY	MODERN SLAVERY RISKS
FOOD COMMODITIES & HORTICULTURE	<p>Particular food commodities carry higher risks of modern slavery. For example, seafood, rice and cocoa supply chains have been identified as carrying heightened modern slavery risks. The horticulture industry also carries heightened modern slavery risks, primarily because of the prevalence of migrant workers and broader labour exploitation in these supply chains.</p>
CONSTRUCTION & MAINTENANCE	<p>The raw materials utilised in the construction industry presents heightened modern slavery risks. Broader labour exploitation, debt bondage, poor conditions and the temporary nature of the work have been identified as prevalent risk factors in the construction industry. These risks are often identified and occur deeper within the supply chains.</p>
ELECTRONICS	<p>The supply chains associated with the production of electronic goods are complex and contain high-risk raw materials that are in high demand. Forced labour, debt bondage and other slavery practices have been identified in electronics supply chains. UnitingSA considers that it may have limited leverage over these supply chains, particularly as the modern slavery risks tend to heighten deeper in the supply chains where visibility is decreased.</p>

Case Study: Modern Slavery Risks in the Procurement of Solar Panels and Construction Projects

UnitingSA provides affordable rental options to individuals on low to moderate income who have difficulty securing housing on the private rental market. To facilitate this, UnitingSA is currently engaging in community housing projects, which involves construction of the community housing. We understand that inherently, the construction industry carries heightened modern slavery risks based on the risk factors outlined above. UnitingSA has identified this, given the projects underway, as an area of focus.

Furthermore, to ensure that our community housing is energy efficient and powered by renewable energy sources, these projects involve the procurement of solar panels. We understand that there are inherent risks associated with the procurement of solar panels, particularly when the solar panels or the raw material components of the solar panels are sourced from the Xinjiang region in China

Based on the results of our risk assessment processes, we have undertaken actions during this reporting period to continue to monitor, assess and mitigate our modern slavery risks which are outlined in Criteria 4 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

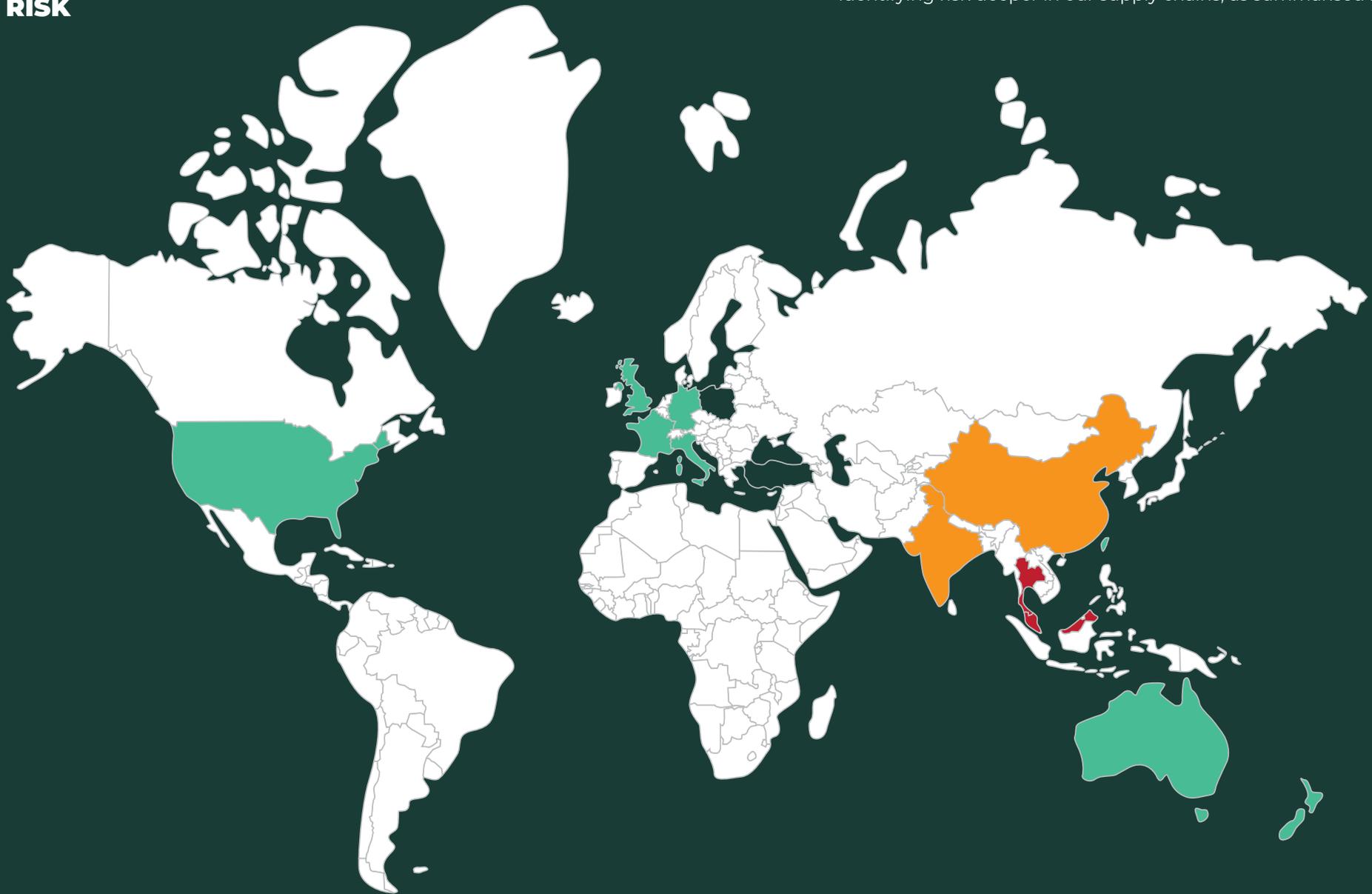
CRITERIA 5:
ASSESSING
EFFECTIVENESS OF
ACTIONS TAKEN

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



AUSTRALIA
FRANCE
SINGAPORE

TAIWAN
GERMANY
ITALY

NEW ZEALAND
UNITED KINGDOM
UNITED STATES



CHINA
INDIA



THAILAND
MALAYSIA

Criteria 4: Actions to address modern slavery risks

During this reporting period, our business, and our sector in general, have faced extreme pressures from our broader compliance and operational requirements. This has placed pressures on our workforce who have had to juggle multiple compliance burdens and competing requirements during this reporting period.

Accordingly, during this reporting period, our goal for our modern slavery compliance framework was to continue to embed our existing modern slavery efforts as business as usual, given the foundational steps taken in previous reporting periods, rather than implementing significant new initiatives.

The key components of our modern slavery compliance framework are as follows:

ACTION	DESCRIPTION
RESPONSIBILITY	The CFO has responsibility of UnitingSA's modern slavery compliance framework. This includes liaising with our third-party advisors which provide us guidance with our modern slavery compliance framework, and reporting progress and identified risks up to the Board.
THIRD-PARTY GUIDANCE	UnitingSA continues to collaborate with a third party to provide us with guidance for our modern slavery compliance framework. This includes assistance with conducting due diligence on our supply chains and implementing our broader modern slavery compliance framework.
DIGITAL PLATFORM	<p>UnitingSA utilises a "Supplier Platform" which allows us to track supplier risk and conduct screenings and broader due diligence efforts on our suppliers.</p> <p>Through the Supplier Platform, we can:</p> <ul style="list-style-type: none"> • issue questionnaires to our suppliers; • "risk score" our suppliers as low, moderate or high risk based on the cumulative risk profile of the suppliers from our multiple due diligence efforts (which are described further below); • conduct audits, tracking remediation efforts based on any non-compliances identified and issue corrective plans; and • issue training and monitor training completions. <p>The system is fully auditable and we are able to generate reports to streamline our reporting obligations (both external and internal).</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

POLICY & PROCEDURES

Our suite of policies and procedures includes our:

- Modern Slavery Policy;
- Procurement Policy;
- Whistleblower Policy; and
- Supplier Code of Conduct.

Our policy and procedure suite sets out our framework for compliance, the mechanisms for reporting concerns, our requirements for modern slavery training and supplier due diligence, and our broader supplier expectations.

CONTRACTING

UnitingSA continues to set out the expectations that we have on our suppliers via our contractual arrangements, including implementing a modern slavery clause in our supplier contracts.

PROCUREMENT FRAMEWORK

In the previous reporting period, we implemented changes to our procurement framework to mitigate some of the issues and risks identified with our previous processes and procedures. For example, we identified areas that we were able to streamline to ensure that our sites can continue to obtain the necessary goods and services provided but from suppliers that meet UnitingSA's desired risk profile. This continued to be actioned and progressed during the reporting period.

Many of the above initiatives were implemented in previous reporting periods and have continued to be utilised and built on during this reporting period. For example, the rollout of the new procurement framework is an ongoing piece of work that continues to be rolled out across our business. Expanding this initiative across the business takes significant time and effort to ensure that our decentralised procurement processes have the necessary oversight needed to effectively monitor this framework.

We have continued to undertake our supplier due diligence efforts, which are detailed below.

SUPPLIER DUE DILIGENCE

Our due diligence systems are conducted through our Supplier Platform. All suppliers are subject to:

- risk matrix assessment; and
- risk screenings.

Further due diligence is then conducted based on the risk profile of the supplier from these two (2) stages of due diligence.

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

The due diligence efforts that we have undertaken are described below. We have also described broader due diligence efforts which form part of our due diligence workflow but have not necessarily been actioned during this reporting period because of resource constraints.

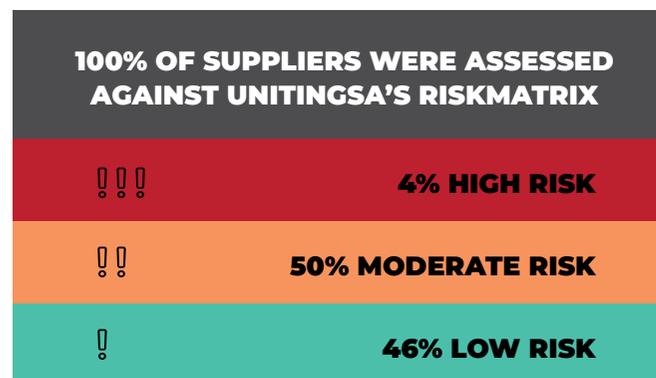
RISK MATRIX ASSESSMENT

Our supplier risk matrix is the first step in our due diligence processes and takes into consideration various risk factors when considering the initial risk profile of the supplier.

The risk matrix assesses suppliers against the following risk factors:

- **Geographic risks** – specific risks associated with a country or region.
- **Product and service risks** – specific risks associated with a particular product or service.
- **Entity risks** – specific risks associated with that entity.
- **Sector and industry risks** – specific risks associated with that particular sector or industry.

In accordance with our risk matrix assessment:



SUPPLIER SCREENINGS

UnitingSA screens every supplier utilising a third-party database for environmental, social and governance (ESG) risks. This includes screening for modern slavery risks, bribery and corruption risks and sanctions.¹ This screening process allows UnitingSA to prioritise suppliers for further due diligence.

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

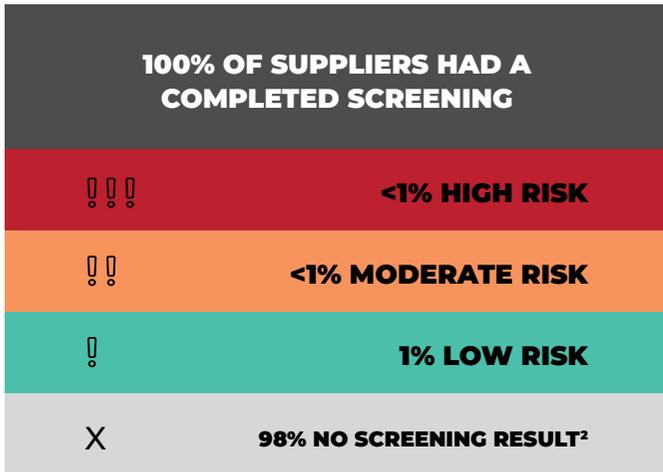
Data and cyber risks – intellectual property, personal data privacy, data security

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.

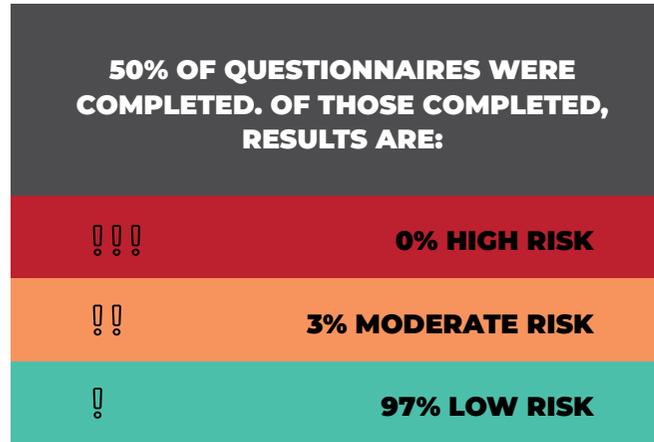
The results of the supplier screenings for FY24 are as follows:



QUESTIONNAIRES

UnitingSA has a supplier questionnaire which can be issued to suppliers to gather information about the risks of modern slavery in their organisations and supply chains, enabling us to understand modern slavery risks deeper in our supply chains. During this reporting period, we have not issued any new supplier questionnaires.

Cumulatively, the risk assessment results from the questionnaires that we have sent in previous reporting periods has been that 97% of the questionnaire results have been assessed as low risk and 3% as moderate risk.



OUTCOMES OF DUE DILIGENCE

Based on the due diligence efforts that we have undertaken to date, we have not identified any instances of modern slavery in our operations or supply chains. However, UnitingSA understands that heightened modern slavery risks are likely to be found deeper in our supply chains which have not yet been explored by UnitingSA as part of its due diligence efforts.

The Supplier Platform continues to enable us to track changes in the risk profile of our suppliers and to communicate directly with our suppliers. We prioritise building and maintaining strong relationships with our suppliers which the Supplier Platform helps facilitate.

²"No screening result" means that there have been no results that have come back for the relevant supplier during the risk screening process.

Criteria 5: Assessing effectiveness of actions taken

As discussed above in Criteria 4, during this reporting period, UnitingSA has been met with competing demands which have drawn staff, time and resources away from our modern slavery compliance efforts. Therefore, during this reporting period, there has been a continuation of the efforts that were implemented in previous reporting periods including, but not limited to, continuing our supplier due diligence processes and engaging a third-party advisor to review our modern slavery compliance framework.

Notwithstanding having a challenging year, we are aware of key areas that need to be improved on in future reporting periods. For example, finalising our procurement framework and ensuring that supplier due diligence processes are integrated as core procedures in our procurement process. This is critical to continue to comply with the continuous improvement approach underlying the Act.

In the next reporting period, we will work towards addressing these key gaps in our modern slavery compliance framework and work with our third-party advisors to fill gaps in our processes and procedures going forward.

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 are from the UnitingSA Group.

The UnitingSA Group is governed by the same executive team and Board. To that end, consultation across the group is extensive and collaboration is required from various teams to implement and maintain our modern slavery compliance framework, from the executive to the procurement team 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's modern slavery compliance framework. Our policies, procedures and codes in connection with modern slavery, and ancillary policies such as our Procurement Policy, apply to the UnitingSA Group, meaning that our broader corporate governance and policy and procedure framework is applicable to, and uniform across, the UnitingSA Group.

CEO'S MESSAGE

THIS STATEMENT

ABOUT US

CRITERIA 1:
REPORTING ENTITY

CRITERIA 2:
STRUCTURE,
OPERATIONS &
SUPPLY CHAINS

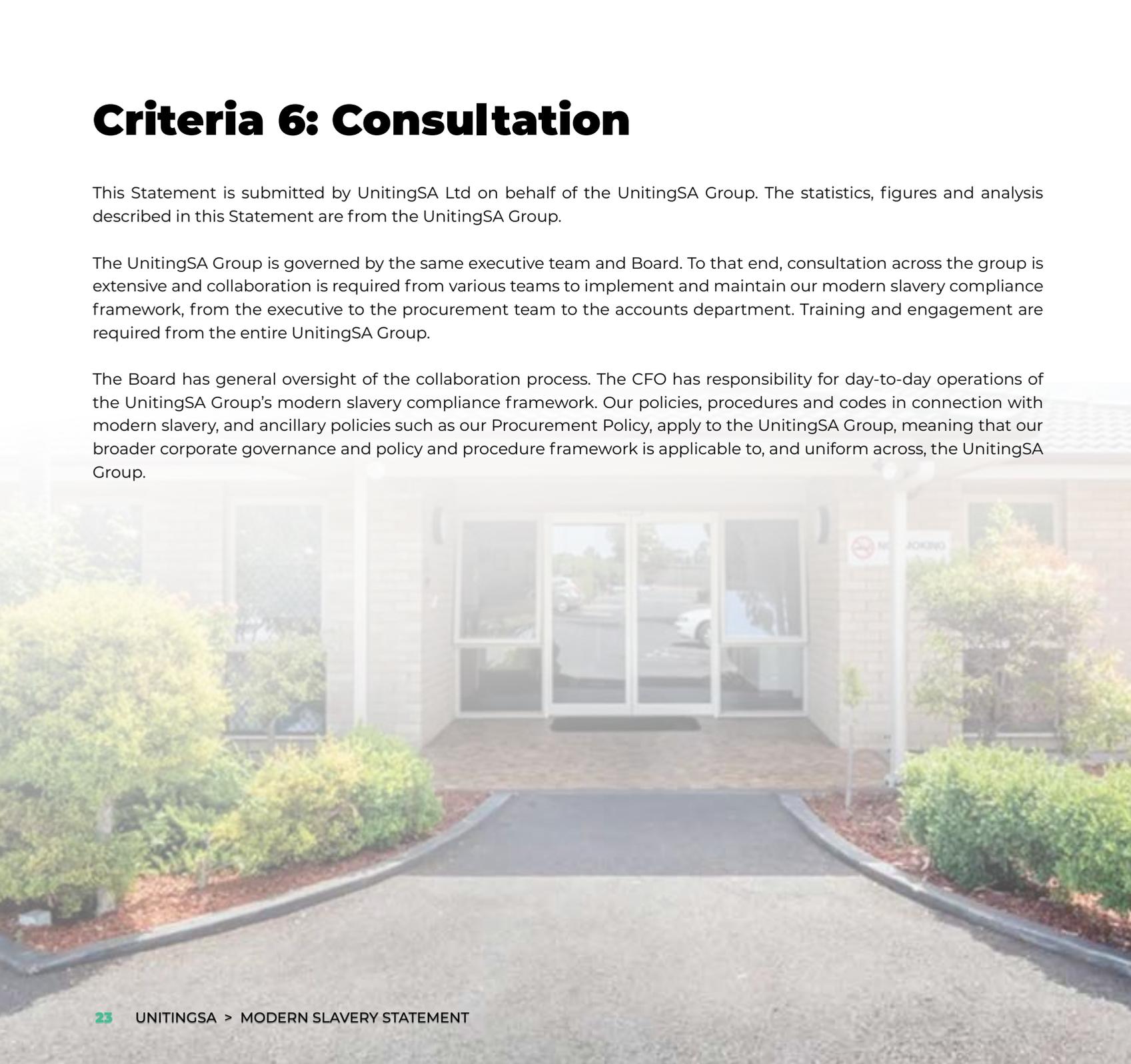
CRITERIA 3: MODERN
SLAVERY RISKS

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 is committed to taking actions to identify risks of modern slavery in our operations and supply chains and undertaking meaningful action to address and mitigate these risks. Our modern slavery compliance framework is part of the foundations of our broader corporate governance systems.

As an organisation in a highly regulated industry, we continue to navigate our competing industry, governance and compliance, and reporting requirements. We will continue to work with our third-party advisors to assess our modern slavery compliance framework and implement action items to evolve our framework in future reporting periods.



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

Together
We can