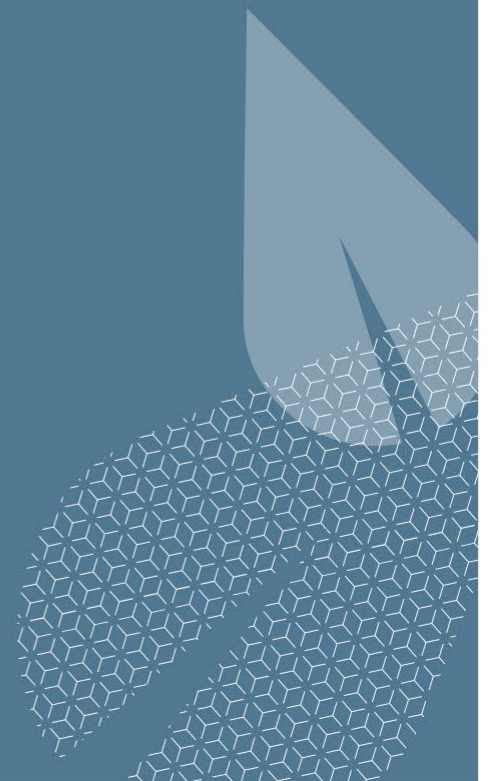




# Modern Slavery Statement

Financial Year Ending 30 June 2023

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## Anglican Community Services

This statement, pursuant to the *Modern Slavery Act 2018* (Cth), sets out the actions taken by Anglican Community Services (referred to as 'ACS', 'us', 'we' or 'our') to address modern slavery and human trafficking risks in our business and supply chain for the financial year ending 30 June 2023 (FY23).<sup>1</sup>

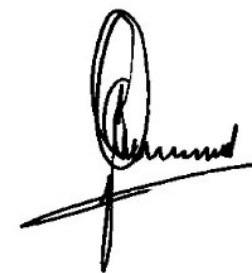
Our values of Integrity, Justice, Compassion and Excellence are fundamental to all our operations and activities. In our relationships with suppliers, and with those involved at all levels in the supply chain, we strive to be honest and transparent and to uphold the right to fairness and dignity for all people. The Global Slavery Index 2023<sup>2</sup> indicates that there are 50 million people in situations of modern slavery. Forced labour accounts for 27.6 million of those in modern slavery and is particularly prominent in the private sector. In view of this fact, we prioritise actively seeking to ensure that our staff and supply chains are not involved in modern slavery practices.

FY23 has been a year of proactively addressing modern slavery risks. For example, we took the opportunity to address our cotton bedding and towelling industry supplier; undertook extensive due diligence of our newly engaged cleaning supplier; bolstered our property maintenance contracts and cleaning contracts through targeted, legally binding modern slavery clauses; developed internal modern slavery training for our managers to help address risk areas; and promoted modern slavery awareness amongst our laundry staff. Further, ACS is developing a Safeguarding Policy to further protect the human rights of people that interact with, or are affected by, our work.

Our senior leadership team is deeply committed to ongoing action to assess and address modern slavery risks. Recognising that most cases of forced labour are found in the private sector and disproportionately affect migrant workers, we will continue to employ measures to combat forced labour and trafficking in business supply chains, promote fair and ethical recruitment, and provide greater support for individuals who are particularly vulnerable to risks of modern slavery.

This statement was approved by the ACS Board on 13 December 2023.

Signed,



**Greg Hammond OAM**  
**Chairman, Anglican Community Services**

13 December 2023

1. Anglican Community Services, trading as Anglicare, is an incorporated entity independent from any other 'Anglicare' or entity associated with the 'Anglicare' name.
2. *The Global Slavery Index 2023*, Walk Free 2023, Minderoo Foundation. Available from: <https://walkfree.org/global-slavery-index/>.

# I. About us

We exist to serve people in need in our community, enrich lives, and share the love of Jesus. We offer life-enriching care and compassion for each person, meeting material, physical, emotional, social, and spiritual needs. We provide a range of services that promote dignity, safety, participation, and wellbeing for people in their relationships, homes, and communities.

As a public benevolent institution, our objectives are to further the work of the Anglican Church Diocese of Sydney by promoting and proclaiming the gospel of the Lord Jesus Christ while undertaking works of public benevolence that reflect the love of Christ.

## Organisational structure

ACS, trading as Anglicare, is a body corporate incorporated under the powers given to the Synod of the Anglican Church Diocese of Sydney by an Act of NSW Parliament, now known as the *Anglican Church of Australia (Bodies Corporate) Act 1938*.

On 1 July 2016, Anglicare Sydney (also known as Sydney Anglican Home Mission Society Council) and Anglican Retirement Villages ('ARV') officially merged to become Anglican Community Services. ACS also owns Anglican Community Services Investment Holdings Pty Ltd (ABN 39 922 848 563) and is the trustee of Anglicare Foundation Funds

ACS is a charity registered with the Australian Charities and Not-for-profits Commission. Our head office is located at Level 2, 62 Norwest Boulevard, Baulkham Hills, NSW 2153. ACS has a geographical coverage that includes greater Sydney, Illawarra Shoalhaven, Northern Inland, and the Norfolk Island regions of New South Wales

## Operations

Our operations are entirely based in Australia and comprise nine business units: Community & Mission, Corporate Services, Finance, Partnership, Operational Support, Property, Residential Care, Retirement Living and Customer Experience.

Our operations include:

- the provision of retirement living (retirement villages);
- the provision of residential care;
- the provision of home care services to older people living in their own homes within the wider community;
- the provision of accommodation to older people at risk of homelessness (or already homeless);
- the provision of a range of nursing and paramedical support services to older people; and
- the provision of a wide range of community support services, including mental health and care support, family and relationships services, out of home care, sustainable living support services, advocacy and social research, disaster recovery services, chaplaincy and pastoral care.



Home Care



Retirement Living



Foster Care and Adoption Services



Counselling



Family, Parenting and Youth Support



More Aged Care Services



Residential Care



Support for Carers



Mental Health



Food and Financial Assistance



Cross Cultural Services



Anglicare Op Shops

In FY23, our total spend was approximately \$209 million on goods and services to support our operations.

## Property

Property development and property management comprise a substantial component of our operations based on the annual procurement spend across the organisation (approximately \$82 million and \$40 million respectively). Our property team manage all developments related to Retirement Living, Residential Care, Social and Affordable Housing and office spaces.

After due diligence is conducted (including review of suppliers' human rights related policies) property management tenders are issued to approved suppliers directly by the Facility Manager or Project Manager. For property development, ACS's design and construction group and external contractors appoint the lead design and architectural organisations via tender, who then appoint sub-contractors to support the development project. All procurement responsibility (for building

materials and services used on site) is assigned to the lead contractor and sub-contractors of the external construction company. Our contractual arrangements with these contractors include a targeted modern slavery clause, explicitly requiring contractors to proactively manage modern slavery risks in the delivery of works under contract. Our property maintenance supplier contracts strengthen our expectations around modern slavery practices in this sector through legally enforceable contractual warranties.

## Staff

ACS employs 4,906 people. The following table shows their employment status and demographic make-up:

1002	Male
3904	Female
2539	Permanent Part-time
1128	Permanent Full-time
1006	Casual
1259	Volunteers
1439	Born overseas & unlimited right to work
1681	Born overseas & are not Australian Citizens
298	SCHADS* Award
3950	ACS Award

\*SCHADS: Community employees receiving the Social, Community, Home Care & Disability Services Award.

Our staff perform a range of roles including:

- care, health and lifestyle;
- operations and hospitality; and
- corporate and administration.

More than half of our workforce perform the following types of roles:

- Carer / care worker;
- Registered nurse and nursing assistant;
- Servery staff;
- Lifestyle worker / lifestyle carer;
- Laundry staff; and
- Administration assistant.

ACS employees also include trainers, support workers, managers, coordinators, physiotherapists,

maintenance personnel, cleaners, gardeners, drivers, counsellors, chaplains, case workers, and cooks.

Cleaning and maintenance are predominately outsourced for most of our sites, with one contractor appointed to service the cleaning needs across our residential care, retirement living, and offices. Nursing agencies, allied health and property services are also sectors where ACS draws on outsourced workers, as required.

The use of agency and contract staff is ACS' third largest area of expenditure (after property development and property management) — approximately \$12.9 million in FY23 (as shown in the table below).

The top categories of spend in FY23\* are shown below:

## Suppliers top category spend

1. Property Development	\$82,491,035	10. Marketing & Advertising	\$3,757,839
2. Property Maintenance (PM) total	\$40,376,685	11. Communication	\$3,380,030
PM – Renovations	\$20,025,932	12. Foster Care	\$2,861,007
PM – Cleaning	\$9,644,705	13. Other +	\$2,843,780
PM – Property Services	\$3,411,359	14. Kitchen Equipment & Audio Visual	\$2,291,901
PM – Plumbing	\$2,483,315	15. Motor Vehicle Fleet	\$2,188,749
PM – Air Conditioning	\$2,019,398	16. Mobility & Aged Care Equipment	\$1,961,686
PM – Electrical	\$1,549,507	17. Waste Removal	\$1,843,920
PM – Fire Services	\$1,242,469	18. Furniture	\$1,199,888
3. Staffing (excluding volunteers)	\$12,908,904	19. Apparel	\$1,042,953
4. IT Equipment & Storage	\$10,709,784	20. Cleaning Chemicals & Equipment	\$891,085
5. Food Services	\$9,825,161	21. Council	\$867,244
6. Insurance	\$9,821,336	22. Print & Stationary	\$732,881
7. Utilities	\$7,836,482	23. Conferences, Seminars & Training	\$440,784
8. Medical Supplies	\$6,702,372	24. Finance	\$402,878
9. Consultancy Services	\$5,947,160	25. Postage	\$328,049

\* The table reflects an indicative spend inclusive of FY23Q2, FY23Q3, FY23Q4 and FY24Q1.

+ Includes non-recurring specialised consultancy services and specialised purchases (items / entertainment).

## 2. The risks of modern slavery in our supply chains and operations

### In our supply chain

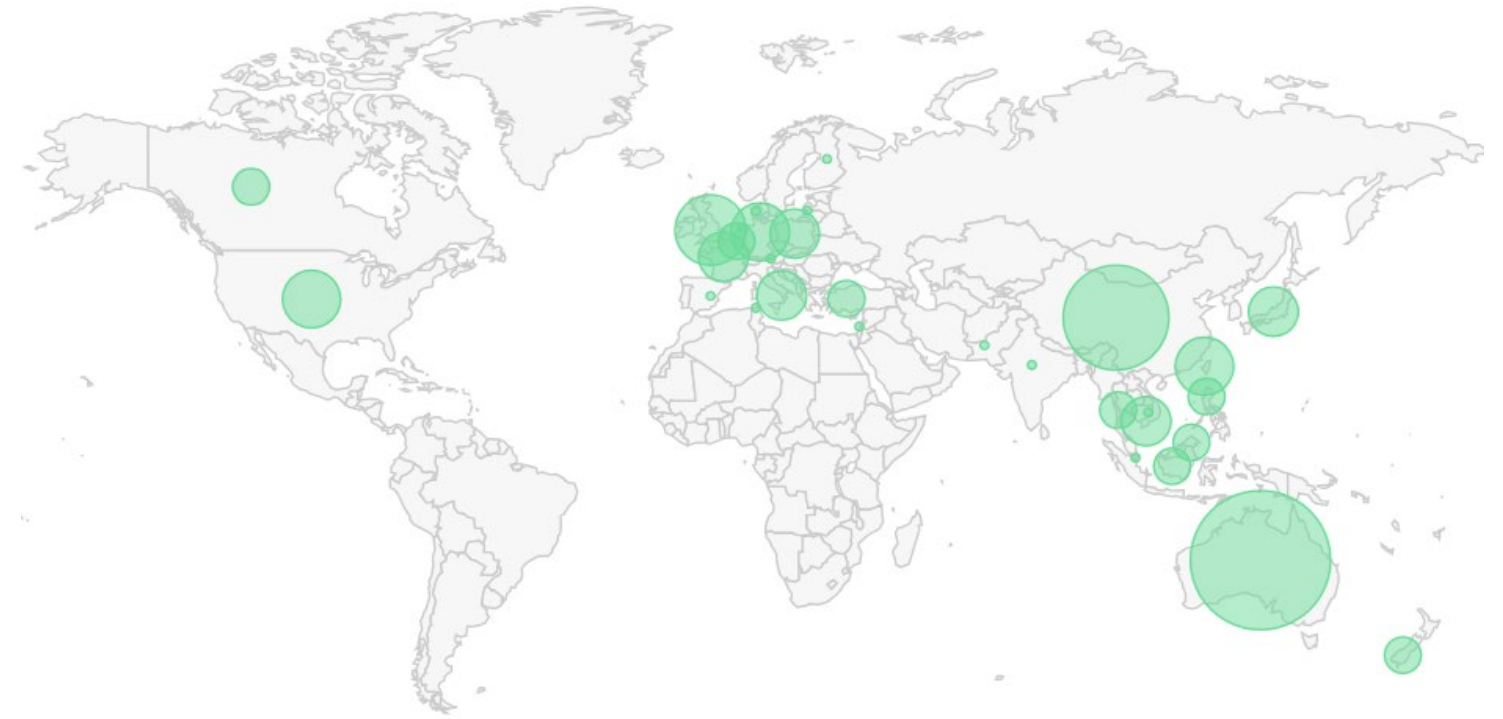
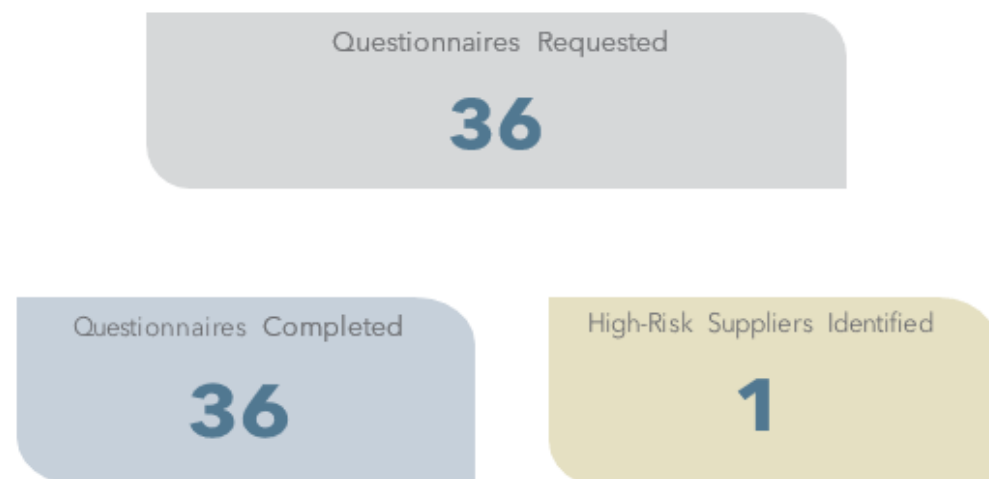
We recognise that our corporate and social responsibilities reside in both our own direct activities, as well as our supply chains, and accordingly seek to purchase products and services that are ethically produced. We look for suppliers that demonstrate a commitment to implementing policies and practices consistent with, and complementary to, our own. In line with the United Nations Guiding Principles on Business and Human Rights, we adopt a risk-based approach when assessing human rights risks in our supply chain.

#### Supplier geography

Amongst our suppliers, the country with the highest number of supplier business operations was Australia (23), followed by China (13). However, all our direct suppliers are based in Australia. While Australia is considered a low-risk jurisdiction for modern slavery, we recognise that the risk of modern slavery may permeate the second and subsequent tiers of our supply chain.

### EthiXbase Questionnaire

ACS uses the ethiXbase platform (an online modern slavery questionnaire) to examine and assess risk within the supply chains of our suppliers. This platform enables ACS to interrogate modern slavery risks, especially where an Australian business supplies products that originate from other jurisdictions. The sub-set of suppliers identified through the matrix and spend analysis process were placed on the ethiXbase platform and were issued a modern slavery questionnaire via email. 36 supplier questionnaires were issued in FY23, targeted exclusively at our moderate-risk and high-risk suppliers based on their risk profile from our FY22 questionnaire results. We achieved a completion rate of 100%.



The above graphic represents the geographic footprint of our third-party suppliers for FY23.

#### One High Risk Supplier in FY23

The data provided by our ethiXbase questionnaires showed only one of our suppliers was identified as high-risk based on geographic region, sector, type of goods produced, and workforce profile. This supplier retails goods produced in some high-risk jurisdictions (including China, Vietnam and the Philippines). The supplier's workforce includes base-skilled workers, disabled workers, labour hire workers, and workers under 18 years of age. ACS received an alert that this company had a high perceived risk indicator (a grading system measuring the potential risk of an entity). Importantly, this does *not* mean that the entity is necessarily involved in modern slavery practices. Indeed, an instant due diligence report was generated which found no active risk alert. The company indicated that none of their workers are required to pay a recruitment fee or surrender passports or any other original personal identification. Further, ACS satisfied itself that the controls and policies in place in this company addressing safety, security, and human rights, etc, were adequately implemented. For example, 80-100% of their workforce has been trained on health and safety at work and human rights. The company indicated that it had implemented controls to protect its third-party employees down the supply chain. The company has also been the subject of an internal / external human rights audit, which made no adverse findings on human rights impacts.

On that basis, we are satisfied that we can continue the supplier relationship while effectively managing modern slavery risks.

## Sector Risk

Some of our top suppliers by spend, although based in Australia, have a higher risk of modern slavery in their supply chain by virtue of their sector risk, as set out in the table below. The risks outlined in this table are general and do not relate to any actual instances of modern slavery in the supply chain of our first-tier suppliers.

Sector	Generally known modern slavery risks
Cleaning and laundry	The cleaning industry is considered high risk for modern slavery largely due to the nature of the workforce and the often-opaque nature of operations. The cleaning sector does not require tertiary qualification in many instances and, as such, the workforce is often low-skilled. Further, those who enter the cleaning sector are often from migrant populations, with potentially limited understanding of their legal rights or a limited understanding of English or both. As a result, cleaning industry workers (who fall into these circumstances) have a restricted ability to bargain with their employers or those with whom they contract, and accordingly are vulnerable to exploitation.
Food services	Due to the nature of the work involved in the production, processing, packaging and transport of food and produce, food related supply chains have a high risk of modern slavery. These risks are not only a concern for supermarkets and suppliers generally; they impact producers, distributors, packers, exporters and caterers. Some examples of modern slavery practices in the food services industry are the engagement of labour hire contractors who recruit backpackers and seasonal workers for fruit and vegetable picking on farms and poor conditions, passport retention and bonded labour in food processing.
Medical supplies	A large percentage of the world's personal protective equipment ( <b>PPE</b> ) is produced in China and Malaysia. Some factories have been reported to be manufacturing rubber gloves and other rubber products using migrant workers with excessive overtime of up to 160 hours a week in unsafe conditions, where passports were confiscated, and high recruitment fees kept workers in debt bondage. <sup>3</sup> Other items of PPE, such as medical robes, are sourced largely from factories in China where there are increased risks of modern slavery. For example, in November 2020, it was reported that the British government sourced PPE for the NHS from factories where hundreds of North Korean women were secretly working in conditions of modern slavery. <sup>4</sup>

Sector	Generally known modern slavery risks <sup>3</sup>
Property maintenance	The prevalence of subcontracting in the property maintenance industry can lead to contractual liabilities and obligations diminishing to the point where the human rights of workers on site may go unnoticed. This occurs because the chain of command has extended to the point that there is little capacity for oversight and transparency.
IT equipment and software	IT companies with the necessary materials to produce electronic goods, and parts of those goods, present a risk. For example, cobalt is an essential component of rechargeable lithium-ion batteries. More than half of the world's cobalt is mined by the Democratic Republic of Congo, where, according to UNICEF, approximately 40,000 miners are children. Another problematic material sourced for IT equipment is mica. India produces 60% of the globe's mica. The most prevalent areas of mica production are in Jharkhand and Bihar, where a third of the population live below the poverty line.
Property development	In the property development industry, the prevalence of opaque subcontracting arrangements and frequent use of labour hire companies increase the risks of modern slavery. Additionally, the industry often relies on low-skilled workers, who may also be migrants with low levels of English. The use of building materials such as concrete, timber, steel, quarried stone products, glass, construction films, textiles, and other goods all carry inherent modern slavery risks. Producers of these items often operate in high-risk locations. For example, forced labour and child labour have been found in brick kilns in countries such as India, Pakistan, Bangladesh, and Cambodia.

3. [www.corporate-responsibility.org/clean-hands-dirty-supply-chains/](http://www.corporate-responsibility.org/clean-hands-dirty-supply-chains/) and [www.theguardian.com/global-development/2018/dec/10/claims-that-nhs-rubber-gloves-made-by-forced-labour-spark-inquiries](http://www.theguardian.com/global-development/2018/dec/10/claims-that-nhs-rubber-gloves-made-by-forced-labour-spark-inquiries).

4. [www.theguardian.com/global-development/2020/nov/20/uk-sourced-ppe-from-factories-secretly-using-north-korean-slave-labour](http://www.theguardian.com/global-development/2020/nov/20/uk-sourced-ppe-from-factories-secretly-using-north-korean-slave-labour).

### 3. Actions taken to assess and address the risks, including due diligence and remediation processes

#### Policies

In FY23, ACS took initial steps to develop a Safeguarding Policy which aims to ensure that people that interact with, or are affected by, ACS are protected. This is relevant to vulnerable people at risk of modern slavery. ACS's Safeguarding Policy sets out how Anglicare manages safeguarding risks and how ACS will support a positive and effective internal culture towards safeguarding. ACS interacts with many vulnerable people and believes that all people, regardless of their personal attributes and external circumstances, have equal rights to protection from abuse, neglect, and exploitation. Safeguarding is an important part of how ACS promotes and protects the welfare and human rights of people that interact with, or are affected by, ACS's work.

Our foundational policies and procedures relating to procurement, such as our Ethical Purchasing Policy, also embed human rights considerations into our purchasing decision-making. New suppliers tendering for ACS works or suppliers currently supplying goods and services to ACS must certify their compliance with our Supplier Code of Practice (the Code). The Code outlines 12 general principles our suppliers should comply with to minimise slavery and human trafficking in their workplaces and supply chains. Suppliers required to report pursuant to the *Modern Slavery Act 2018* (Cth) must also certify their compliance with the legislation. The Code and Ethical Purchasing Policy are available on our website.

#### EthiXbase Questionnaire

Our online modern slavery questionnaire was used in FY23 to assess the modern slavery risk profile of a sub-set of our major suppliers on the higher end of the risk spectrum. The risk ratings from FY22 were used to inform our supplier engagement process for FY23. We communicated with suppliers identified as requiring further engagement based on the results of the questionnaire, requiring that they submit a modern slavery action plan to ACS to address the identified risks where appropriate. As noted above, we achieved a 100% completion rate of our medium-to-high risk supplier questionnaires. This has given ACS confidence that our suppliers are effectively managing modern slavery risks.

#### Internal Manager Training

ACS has created its own internal modern slavery training program for managers addressing prominent risk areas specific to Anglicare's operations, such as the cleaning and laundry industry, food services, medical supplies, property maintenance, property development, IT equipment and software sectors. ACS is also in the process of developing a training program for all staff to increase modern slavery awareness.

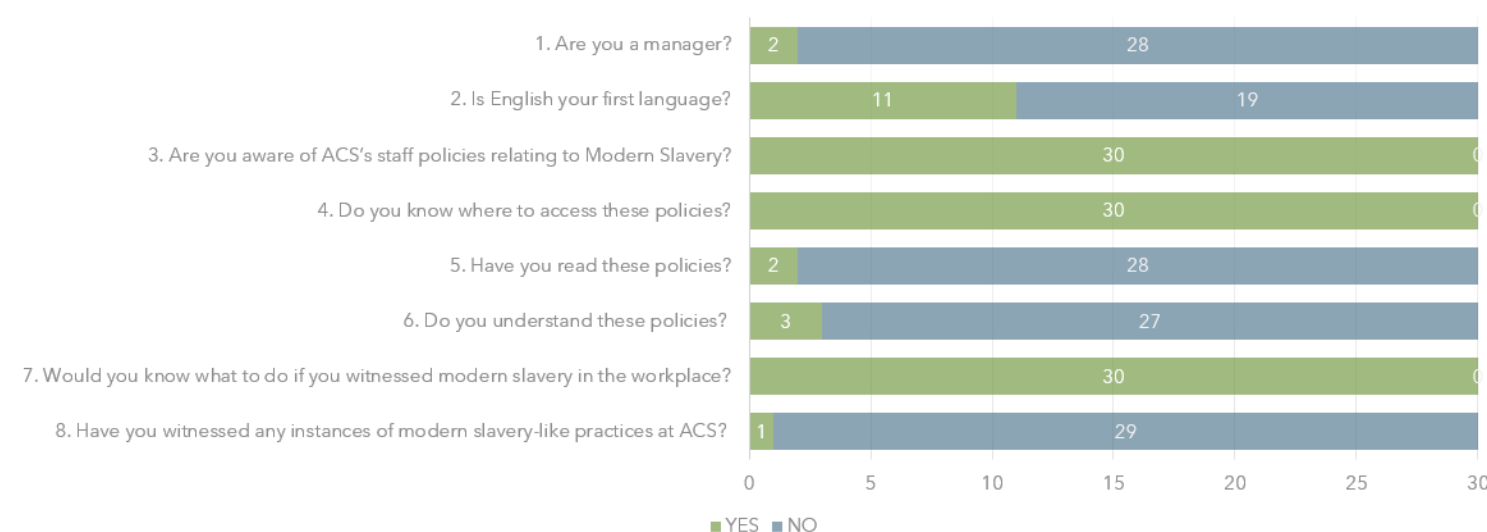
#### Internal Questionnaire and Feedback from ACS's Laundry Staff

We decided to undertake a "deep dive" into the laundry sector as this is one of ACS' high-risk spaces. ACS issued an internal questionnaire to employees and managers working in our laundry department. This questionnaire sought feedback on the accessibility and intelligibility of ACS's policies that touch on modern slavery. Importantly, only 11% of those questioned had English as a first language and many came from vulnerable backgrounds, including refugee backgrounds.

Laundry managers have healthy rapport with their staff and ensured staff understood the questions being asked of them. This was achieved by conducting small group sessions based on language spoken. For example, the Vietnamese speaking employees were grouped together and discussed the questionnaire in Vietnamese. This distribution method effectively addressed the strong cultural and linguistic barriers characteristic of the laundry sector. The laundry managers discussed the definition of modern slavery and how it can manifest in the workplace. Engagement was high, with 83% of laundry staff (30 participants) completing the questionnaire, the results of which are included below. Staff were keen to continue their understanding of modern slavery and, at their request, each week a new ACS policy is printed and left available for them to read and discuss within their teams. ACS will also provide internal modern slavery training to all staff in FY24.

Participants were asked whether they had witnessed any instances of modern slavery-like practices at ACS, with one respondent stating that they had experienced it first-hand approximately 10 years ago. However, upon further discussion and questioning, the matter was not taken further as it appears to be mischaracterised as a modern slavery practice. ACS was pleased that open communication is working in practice and staff feel comfortable and supported in growing in their modern slavery awareness.

#### LAUNDRY QUESTIONNAIRE RESPONSES



## Actions Taken for ACS Employees

ACS ensures its own employees are not working under conditions of slavery including by requiring that employment contracts are signed prior to commencement of employment. These employment contracts include protections regarding minimum wages, hours of work, breaks, leave, holidays, consultation and dispute resolution, national employment standards, agreement flexibility, workload management, and training.

Employees are paid for their services under ACS's enterprise agreements. Under this agreement, employees are hired based on their skills, qualifications and suitability for the role. The ACS Enterprise Agreement remunerates employees at a higher rate than the modern award. Additionally, all staff, regardless of their demographic background and vulnerabilities, are protected by ACS's various policies and procedures, including ACS's:

- Safeguarding Policy (in development);
- Ethical Purchasing Policy;
- Code of Conduct;
- Managing Misconduct Policy;
- Preventing Bullying, Harassment and Discrimination Policy;
- Recruitment and Selection Policy;
- Staff Grievances and Complaints Policy;
- Health, Safety and Wellbeing Policy;
- Complaints and Feedback Policy;
- Whistleblower Policy;
- Child Safe Child-Friendly Organisation Policy; and
- Child Safe Reportable Conduct Policy.

## Review of Modern Slavery Clauses in Supplier Contracts

In FY23, we reviewed our property maintenance supplier contract and cleaning supplier contract to strengthen and solidify our expectations around modern slavery practices in these sectors. In these legally enforceable contracts, our contractors are required to warrant that they have investigated both their own labour practices as well as those of their subcontractors to ensure there are no forced labour or modern slavery practices used anywhere in their business or in any of their supply chains. Our contractors also warrant that they will maintain all necessary processes to ensure this, and report to ACS when requested, as well as complying with ACS's Ethical Purchasing Policy and Code of Practice. Finally, our contractors must allow ACS to access all records relating to the contractor's modern slavery obligations under the contract.

## Cleaning Sector – New Contractor Due Diligence

In FY23, we engaged a new cleaning contractor to provide cleaning services across our operations. The contractor operates, and is headquartered in, Australia. ACS conducted a rigorous tender process and review of the cleaning contractor's business structure, Code of Conduct, Corporate Social Responsibility Policy, Diversity and Equal Opportunity Policy, and Modern Slavery Statement. Being under the legislated annual turnover threshold, the contractor was not required to have this statement, but nevertheless demonstrated its commitment to acting ethically and transparently, and to put effective systems and controls in place to safeguard against any form of modern slavery within its business or supply chain.

The contractor committed to the disclosure obligations under the *Modern Slavery Act 2018 (Cth)* and expects suppliers down the supply chain to hold their own suppliers to the same high standards. The contractor conducts its own due diligence prior to engaging subcontractors, and issues new and existing suppliers with a modern slavery supplier questionnaire to identify, assess and mitigate risks in its supply chains, which will be made available to ACS upon our request.

## Cotton Bedding and Towelling Sector Audit and Review

ACS decided to undertake a targeted review of another high-risk sector by investigating the supply chain of our cotton bedding and towels supplier, which receives its products from two textiles companies (based in Shandong in the northernmost province of eastern China). These textile companies manufacture bathmats, face washers, bath towels, towels, bath robes, and bedding. Our supplier investigated the working conditions in both Chinese factories in person and via zoom meetings and provided ACS with their policy position on Modern Slavery and their Codes of Practice (which ACS has reviewed).

An Ethical Audit Report was provided by the third-party auditor, Sedex, to identify, manage and assess social and environmental supply chain risks and gain supply chain visibility. The Sedex Ethical Trade Audit Report (the Report) examined labour standards, health and safety, environment, and business ethics within these two textiles companies in 2022 and 2023. ACS' review of the Report of the towel manufacturing company found that, in terms of living wages and benefits, there was insufficient social insurance coverage. According to the social insurance payment receipt provided by factory management, it was noted that only 17 out of 30 employees were provided with pension insurance, accident insurance, unemployment insurance, medical insurance, and 'maternity insurance' in September 2022. It was recommended that factory management adopt practices and controls to ensure employees receive their statutory welfare entitlements. This recommendation will be subject to a further verification review by ACS in 2024. In terms of working hours, the Report found that monthly overtime hours exceeded the Sedex's standard; however, the overtime wage was paid appropriately to workers and overtime was taken up voluntarily by the workers who retained the right to choose whether or not to work overtime. Accordingly in 2024, ACS will seek verification (by audit) that monthly over time hours to Sedex's standards has been addressed. Workers were paid monthly above the legal minimum wage. All workers were permanent and hired directly by the factory. There were no recruitment fees, taxes, deposits or bonds for the purpose of placement of workers. The factory had a written human rights policy and grievance mechanism for confidential reporting and human rights impacts.

With respect to the second factory that manufactures cotton bedding, the Report listed areas of concern including issues with safe and hygienic working conditions (specifically fire prevention, and the lack of a structural engineer evaluation of the building). Further, excessive working hours were identified. Workers' overtime hours exceeded 36 hours (often amounting to 45 hours). The general manager of the textile factory stated that for occasional overtime work, worker consent is obtained, and overtime is never used as a disciplinary measure. A follow up audit will be conducted and depending on the outcome of that audit, appropriate action taken by ACS. ACS will liaise with our direct supplier, so these matters are addressed. This in the context where the towel factory had 3 non-conformances (against the 16 Sedex standards), and the cotton bedding factory had 2 non-conformances (against the 16 Sedex standards).



## 4. How we assess the effectiveness of our actions

As described in the United Nations Guiding Principles, tracking is necessary for a business enterprise to check if its human rights policies are being implemented, whether it has responded effectively to the identified human rights impacts and to drive continuous improvement.

In our previous Modern Slavery Statements, we sought to track the effectiveness of our actions over the subsequent reporting periods by setting goals in relation to our operations and supply chain. The table below provides an overview of our progress against these goals. During the course of the next reporting period, we will continue to review, monitor, and embed our processes in accordance with the table below.

Workstream	Activities	Methods for tracking effectiveness	Status as at FY23
Operations	Annual review of ACS processes to identify and address modern slavery risks in our operations.	a. Obtaining and assessing feedback from staff and management teams regarding the adequacy of the policies in place to address modern slavery risks in our operations;	Completed
		b. Revising policies and processes as and when required to improve the way in which modern slavery is addressed;	Completed
c. Providing staff training designed to raise awareness of modern slavery risks.		Ongoing	
	Review of grievance mechanism	d. Regularly review reported cases with a view to assess how these were handled, and how the response could have been improved.	Ongoing
Procurement	Conduct an audit of the prequalification checks for suppliers to determine if mitigation measures have been consistently actioned	e. Conducting checks with the assistance of the Finance Team to see if any supplier invoices were paid without the supplier undergoing the prequalification checks so as to close gaps (if any);	Completed
		f. Assessing the percentage of supplier agreements entered into with the updated modern slavery clause and looking into the circumstances of when suppliers sought to negotiate out of the clauses (and reasons for same);	Ongoing
		g. Comparing ethiXbase questionnaire responses as against prequalification documentations (to check for any irregularities);	Ongoing

Workstream	Activities	Methods for tracking effectiveness	Status as at FY23
Procurement	Track the number of high-risk suppliers and levels of awareness among staff.	h. Comparing the results of the ethiXbase questionnaire year on year;	Completed
		i. Identifying the higher risk suppliers via the ethiXbase questionnaire and developing plans for further due diligence measures;	Completed
		j. Tracking the number of individuals who have undertaken modern slavery training.	Completed
	Supplier engagement	k. Conducting periodic checks on suppliers to verify their compliance with the Code;	Ongoing
		l. Recording the instances of non-compliance and developing corrective action plans as and when required.	Ongoing
	Further due diligence	m. Engaging further with the suppliers that responded in the modern slavery questionnaire that they have been the subject of a negative human rights audit and/or have not implemented controls to protect the health and safety of their workforce to determine appropriate next steps (eg remediation, corrective action plans).	Not applicable in FY23

### Goals for Financial Year 2024

Our modern slavery goals for FY24 include:

- Offering internal modern slavery training for ACS staff;
- Continuing to assess and review processes within our Operations and Procurement workstreams; and
- Continuing supplier engagement and due diligence with suppliers through the ethiXbase questionnaire. Anglicare will employ a risk-based approach in issuing questionnaires to medium-risk and high-risk suppliers that are under the annual spend threshold based on their industry / geographical risk profile.

## 5. Consultation with any entities owned or controlled

ACS is the Trustee of the Anglicare Foundation Funds (the **Foundation**) (ABN 24 086 334 058) which was established by a Trust Deed dated 31 December 1984 and subsequently varied including on 11 September 2018. The amendments made on 11 September 2018 give effect to the creation of an ACS gift fund for identifying and recording gifts that can only be used in accordance with the objects of ACS. The deed provides that the Foundation's

trust funds shall be applied and used exclusively for the support of the work of ACS, the Trustee. The Foundation does not have any operations that are independent of ACS. Therefore, consultation with the Foundation was not required for the purposes of preparing this statement. Finally, ACS also owns Anglican Community Services Investment Holdings Pty Ltd (ABN 39 922 848 563), which entity acts only as a holding company.

## 6. Any other relevant information

Through the services we offer, such as food and financial assistance, housing, cross cultural services, and counselling, we seek to contribute to addressing the structural factors that can lead to modern slavery. For example, we work to assist migrants, refugees, and asylum seekers to learn English, provide counselling and facilitate community connections. ACS also provides a range of social and affordable housing options for households on very low, low and moderate incomes. We seek to provide households with pathways to unassisted housing and affordable housing solutions.

Our financial assistance programs include no interest loan schemes, financial counselling, utility bill assistance, rental arrears assistance, bond assistance, medical assistance to assist with pharmacy costs, and advocacy support to negotiate lower specialist fees.

ACS currently provides assistance to 625 older Australians through their social and affordable housing program in the Greater Sydney region. Across 8 locations, our residents are provided with a safe place to call home and in which to belong to a community. Tailored case management support is also provided to residents where required. Most residents are comforted by the fact that they have a place where they can live whilst they are still able to remain independent. During FY23, ACS delivered an additional 23 social and affordable housing units in Greater Sydney.

We believe these are some of the ways ACS can contribute to addressing the root causes that can lead to modern slavery.

## Mandatory reporting criteria & page reference

Mandatory criteria for Statements under the <i>Modern Slavery Act 2018</i> (Cth)		Page number/s
Section 16 (1) (a)	Identify the reporting entity.	3 - 5
Section 16 (1) (b)	Describe the reporting entity's structure, operations, and supply chains.	5 - 8
Section 16 (1) (c)	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	8 - 11
Section 16 (1) (d)	Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	12 - 15
Section 16 (1) (e)	Describe how the reporting entity assesses the effectiveness of these actions.	16 - 17
Section 16 (1) (f)	Describe the process of consultation with any entities the reporting entity owns or controls.	18
Section 16 (1) (g)	Any other information that the reporting entity, or the entity giving the statement, considers relevant.	18



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