



Uniting Church in Australia  
SYNOD OF VICTORIA AND TASMANIA



FY21

# MODERN SLAVERY STATEMENT





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## | Foreword

*This joint modern slavery statement is made by The Uniting Church in Australia Victoria and Tasmania group which includes:*

- ▶ *The Uniting Church in Australia Property Trust (Victoria) (**the UCAPT**)*
- ▶ *The Uniting Church in Australia Property Trust (Tasmania) (**the UCAPT**)*
- ▶ *Uniting (Victoria and Tasmania) Limited (**Uniting**),*
- ▶ *Uniting Ethical Investors Limited and*
- ▶ *Uniting AgeWell Limited (**AgeWell**)*

The Uniting Church in Australia is a values-based organisation with a long-standing history of lobbying for positive change on a broad range of human rights and social justice issues.

We are committed to implementing and enforcing effective systems and controls, within the reasonable limit of our resources, to ensure modern slavery does not occur within our operations or supply chains. We respect the human rights of our employees, volunteers, consumers, and employees of our suppliers and business partners, and we commit to identifying and managing any risks to these rights.

We comply with relevant local and national laws related to human rights and modern slavery concerning our employees and our business operations. The services we provide and the way we work strive to be human-centred and rights-based, as recognised and articulated in international declarations, treaties and covenants that aim to ensure peace and equality among all peoples.

We are committed to building relationships with suppliers, contractors and business partners who share our purpose, values and commitment to ethical and legally compliant business practices.

In accordance with the Federal Government's *Modern Slavery Act 2018 (Cth) (the Act)*, this statement outlines the steps taken during FY2020/21 to assess and address modern slavery risks within the reporting entities.

For our second reporting year, our areas of focus have been:

- ▶ Understanding our supply chains and identifying the products that are being purchased across our operations;
- ▶ Developing relationships with our suppliers and businesses in which we hold investments that have been identified as being of higher risk of having modern slavery in their supply chains; and
- ▶ Identifying and improving our process to reduce the risk of modern slavery being associated with our operations.

In preparing this statement, the reporting entities established a central oversight committee with membership from each entity that met regularly over more than 12 months. The committee agreed to a general approach for identifying and assessing risks and took a collaborative approach wherever central services were used or where common suppliers were identified to increase leverage.

This Statement was approved by the members of the Uniting Church in Australia Property Trust (Victoria) and the Uniting Church in Australia Property Trust (Tas.) pursuant the powers vested in them pursuant to section 13(3) of *the Uniting Church in Australia Act 1977 (Vic)* and section 11 of *the Uniting Church in Australia Act 1977 (Tas)* respectively and being the statutory corporations governing the Uniting Church in Australia and its institutions in Victoria and Tasmania on 10 November 2021.

### **Bob Hodges**

Chairperson

*The Uniting Church in Australia Property Trust (Victoria) and The Uniting Church in Australia Property Trust (Tas.)*

10 NOVEMBER 2021



## Structure of this Statement

The Uniting Church in Australia Group is pleased to make this Statement the contents of which are arranged as follows:

About the Uniting Church in Australia: this provides background on legal structures of the Group

1. **Justice and International Mission:** this gives a history of the Uniting Church in Australia's long association with work towards eliminating modern slavery and identifies key industries relevant to the Group
2. **Synod of Victoria and Tasmania:** outlines the efforts made in the Uniting Church in Australia's structures to eliminate modern slavery
3. **Uniting:** outlines the efforts made in Uniting's structures to eliminate modern slavery
4. **U Ethical:** outlines the efforts made by U Ethical to eliminate modern slavery
5. **AgeWell:** outlines the efforts made in AgeWell's structures to eliminate modern slavery

## 1. About the Uniting Church in Australia

Since the amalgamation of the Presbyterian, Methodist and Congregational churches in 1977 to form the Uniting Church in Australia, which has become the third-largest Christian denomination in Australia, helping Australians in the search for meaning, purpose and community in life.

- ▶ The Uniting Church in Australia is governed by four non-hierarchical, inter-related councils, each one with different responsibilities:
- ▶ The Uniting Church in Australia Assembly (the national council);
- ▶ Synod (the regional council);
- ▶ Presbyteries (the district council); and
- ▶ Congregations (the local council).<sup>1</sup>

The Synod of Victoria and Tasmania is one of six Synods across the Uniting Church in Australia.

The Synod pursuant to Clause 15 (d) of the Basis of Union<sup>2</sup> has responsibility for the general oversight, direction and administration of the Uniting Church in Australia's worship, witness and service. A Synod Standing Committee acts on behalf of the Synod in respect of its responsibilities.

<sup>1</sup> Referred to in Clause 15 of the Basis of Union, which is a Schedule to each The Uniting Church in Australia Act 1977 (Vic) and the Uniting Church in Australia Act 1977 (Tasmania) (the UCA Acts).

<sup>2</sup> Which is Schedule One to the UCA Acts



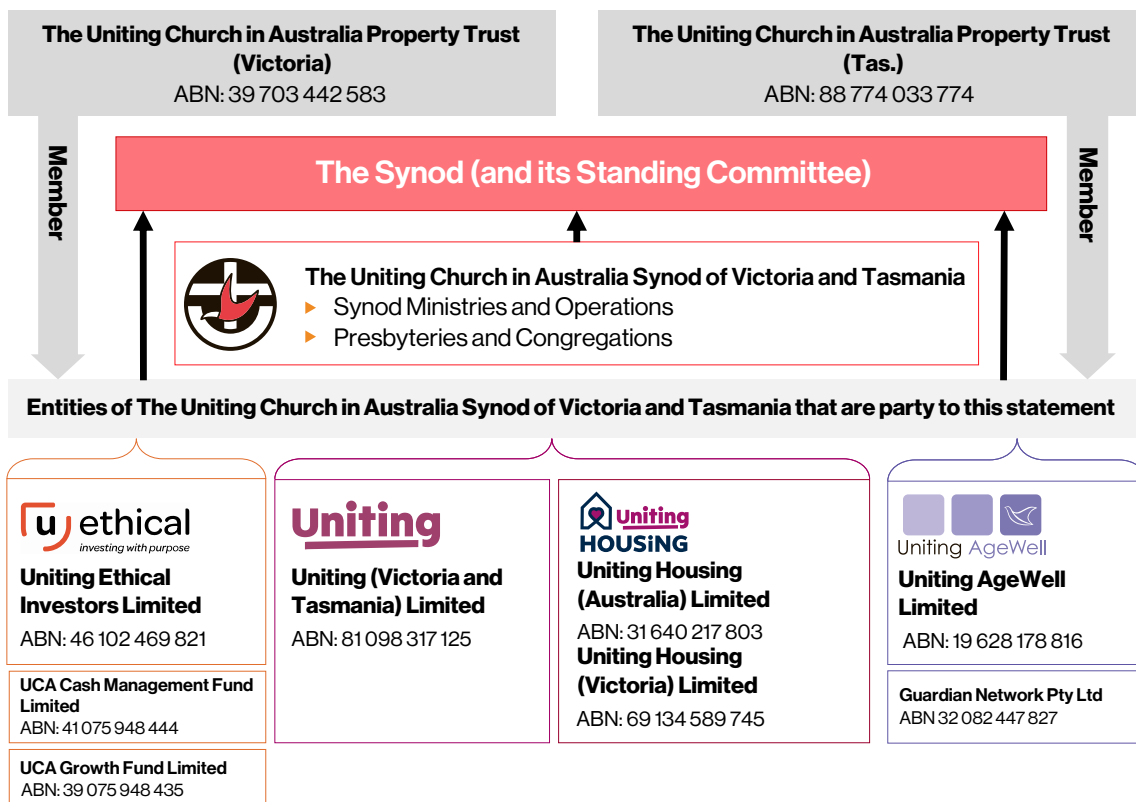
Through our historic and ongoing community work, we and our predecessors established and maintained several entities to act as an extension of the Church, including:

- ▶ Uniting (Victoria and Tasmania) Limited;
- ▶ Uniting AgeWell Limited;
- ▶ Uniting Ethical Investors Limited;

Each of these agencies implements the Synod’s strategic directions in social welfare, public welfare, community services, aged care, investment management, and public housing. They act for the Synod, its presbyteries and congregations while reporting to the Synod Standing Committee.

At union of the three churches in 1977, property trusts were established in each state and territory to hold “trust property” in trust for the Church. The UCAPTV and UCAPTT are constituted as corporations<sup>3</sup>, and are charities registered with the Australian Charities and Not-for-profits Commission. They control our related entities as members of those entities.

This statement covers the activities and legal entities controlled by the UCAPTV and UCAPTT, which are members of each entity. Each entity reports to the Synod Standing Committee, the governing body. Our operating entities and their relationship are as below:



<sup>3</sup> By Section 12(1) of The Uniting Church in Australia Act 1977 (Vic); and Section 10(1) of the Uniting Church in Australia Act 1977 (Tas).



Uniting Housing (Australia) Limited and Uniting Housing (Victoria) Limited outsource a range of operational and administrative services to Uniting. The outsourcing arrangement includes end-to-end procurement of all goods and services. For that reason, the Modern Slavery Statement is being made by Uniting on behalf of all three entities.

Guardian Network Pty Ltd is a fully held subsidiary of AgeWell and so AgeWell is making this Modern Slavery Statement on that entity's behalf.

## 1.1 Approach

Our entities approached their respective modern slavery risk assessments by assessing their operations and supply chains according to key risk indicators across the following aspects of the supply chain:

- (a) products or service type, and nature of production
- (b) sector and industry, and types of employment arrangements generally applied
- (c) geographic distribution of supply chain
- (d) entity and structure of suppliers.

The specifics of each entity's approach varied due to differences in the nature of their operations and the sector within which they operate. Further details are provided within individual entity sections of this statement. Where entities identified common supply chains with potential modern slavery risks, a joint approach to further assessment and supplier engagement was taken to reduce duplication and increase market leverage.





## | 2. Justice and International Mission

### 2.1 About the Justice and International Mission Cluster

The Synod's Justice and International Mission Cluster (**JIM Cluster**) advocated for supply chain transparency legislation from 2011. The JIM Cluster is a section of staff within the Synod dedicated to resourcing church members to take action on issues of social justice, human rights, environmental protection and global development.

We were represented on the Supply Chain Working Group of the Attorney General's National Roundtable on Slavery and Human Trafficking that recommended the legislation to the Minister. We participated in the parliamentary and departmental inquiries in developing and passing the Act into law. We were represented on the advisory body that drafted the guidance to reporting entities on the implementation of the Act.

We continue to be represented in the Australian Government's National Roundtable on Slavery and Human Trafficking.

We are also members of the Australian Border Force Modern Slavery Expert Advisory Group.

We have been part of global campaigns to address modern slavery in specific industries and locations. These have included:

- ▶ the cocoa industry in West Africa
- ▶ cotton production in Uzbekistan
- ▶ the seafood industry in Thailand
- ▶ disposable glove production in Malaysia
- ▶ the tinned fruit and vegetable industry in Thailand
- ▶ the garment industries in India and Cambodia.

We have also campaigned to the Commonwealth Government for reforms to address modern slavery-like situations on Australian farms, which usually involve people on temporary visas.

We have experience organising on-the-ground investigations into businesses, working in collaboration with local non-government organisations and trade unions with the appropriate expertise.

Given the experience and capabilities of the JIM Cluster, and the overlap of some suppliers between entities, the JIM Cluster coordinated investigations into the entities' suppliers on their behalf. The following section outlines specific interactions the JIM Cluster had with suppliers that represented a high risk of modern slavery in one or more of the entities' supply chains. Each of the suppliers investigated relate to at least one of the reporting entities covered by this statement. A materiality threshold of \$50,000 of purchase in the previous 12 months was applied in deciding which suppliers to engage with. We took the view that for any supplier where our purchase was below \$50,000, we were unlikely to be able to influence the behaviour of the supplier in dealing with modern slavery risks. The focus was also on engaging with suppliers that would have an ongoing relationship with the Synod through one of its entities.





## 2.2 Modern slavery in our fruit, vegetable and seafood supply

On 28 July 2021, we contacted Bidfood, as one of our major foodservice suppliers. We requested a list of their suppliers for fruit, vegetables and seafood. As of the time of writing, we were informed that the company would get back to us. At the time of writing, we had not heard back from Bidfood.

On 30 July 2021, we contacted SAJ Fruit Supply. We asked what information they could supply about steps they were taking to ensure there was no modern slavery in their supply chain. They provided us with their policy statement on addressing modern slavery. They agreed to work with the Synod to address any risks of modern slavery related to the farms from which they are sourcing product.

Across the reporting entities, spend with Coles and Woolworths exceeded \$800,000 with each supplier over the 12 month period. It has not been possible to establish the specific goods that have been purchased across the organization, but we have assumed that some of that spending has been on horticulture products. We followed up with both Coles and Woolworths on 27 September 2021 to obtain an update on their systems to address modern slavery risks in their horticulture supply chains. Both companies immediately agreed to meet.

## 2.3 Disposable glove production

As outlined in our first Modern Slavery Statement, we were concerned about the strong evidence of modern slavery of workers from Nepal, Myanmar, Indonesia and Bangladesh in disposable glove factories in Malaysia. These reports continued into 2021 and at the time of writing.

The supplier of disposable gloves to Uniting provided us with the name and address of the factory they were sourcing disposal gloves from in Malaysia, Maxter Glove Manufacturing. Maxter Glove Manufacturing is a subsidiary of the Supermax Corporation Berhad.<sup>4</sup> The name and address of the supplier were provided to us in October 2020. The Synod funded an in-country investigation into the



factory. The investigators initially reported the workers were not willing to speak with the investigators. In June 2021, the investigators reported that the factory was using a labour provider

The estimated 150 workers from Nepal under the control of a labour provider were reported to have paid a recruitment fee of between \$1,700 and \$2,300 in Nepal to secure the jobs at Maxter Glove Manufacturing. Workers reported that they get one day off a week. Workers that were packing gloves in cartons were paid a piece rate. Workers reported being paid between \$10 and \$11 a day for a 12 to 16-hour shift. The pay rate is allegedly below the minimum legal wage in Malaysia for these workers, which was \$385.75 (RM1,200) per month. In addition, they reported they were required to pay \$91 per month for food, accommodation and laundry. The accommodation provided by the factory is pictured to the left.

<sup>4</sup> Supermax Corporation Berhad, 'Annual Report 2021', 5.





The workers stated they would have \$80 (RM250) deducted from their wages for any day they refused to do overtime. In addition, workers said they are not paid for any sick leave. Workers from overseas also stated they were not free to leave the factory compound. They stated they had not been able to leave the factory compound since March 2020.

The people working at the factory also stated there had been a system of fines imposed on them by the factory up until six months ago. One worker said he had lost \$3,850 (RM12,000) in factory imposed fines in one year. For example, workers report that the factory fined them if they do not walk straight, wear a watch, or if they criticise the food the factory sells them. The workers alleged there was a fine of RM300 (\$96) for going to the toilet without a pass issued by the factory.

When we approached our gloves supplier in Australia with the results of the investigation, they had already dropped Maxter Glove Manufacturing from their suppliers when we contacted them. As a result, we shifted our glove supplier to be a supplier used more widely by UnitingCare and Uniting operations across Australia, WINC.

The investigator shared their findings about the Maxter Glove Manufacturing factory widely with government representatives, other buyers and civil society organisations. On 20 October 2021, US Customs and Border Protection placed a Withhold Release Order on all products from Supermax Corporation Berhad, including specifically Maxter Glove Manufacturing.<sup>5</sup>

US Customs and Border Protection concluded that there were reasonable indications that Supermax Corporation Bhd and its subsidiaries use forced labour in their manufacturing operations.<sup>6</sup> “CBP identified 10 of the International Labor Organisation’s indicators of forced labor during its investigation.”<sup>7</sup> There are 11 ILO indicators of forced labour.

We asked WINC for details on their actions to address modern slavery and from which factories they were sourcing disposable gloves. They provided us with their Ethical Sourcing Policy, their *modern slavery statement* and a list of the suppliers that had supplied us with rubber gloves. Uniting purchased 74 different disposable glove products from 15 suppliers through WINC from August 2020 to July 2021. The vast majority of these products came from Malaysian factories. We requested information on which factories in Malaysia gloves were being sourced. WINC stated that it was not within their power to disclose the factories their suppliers were sourcing gloves from. As an alternative, we agreed to share information on evidence of modern slavery in specific Malaysian glove factories with WINC for their consideration.

On 16 August 2021, U Ethical wrote to AMGen, Novo Nordisk, Glaxosmithkline, Shionogi, Danone and Bristol-Myers Squibb to request information about what steps they had taken to address the risks of modern slavery in their disposable glove usage. These are companies in which U Ethical has holdings. We also requested to know if they were sourcing disposable gloves from any factories in Malaysia and, if so, which factories.

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5 US Customs and Border Protection, ‘CBP Issues Withhold Release Order on Supermax Corporation Bhd and its Subsidiaries’, 20 October 2021.

6 US Customs and Border Protection, ‘CBP Issues Withhold Release Order on Supermax Corporation Bhd and its Subsidiaries’, 20 October 2021.

7 Ibid.



Shionogi replied on 24 August 2021 to inform us they did not conduct human rights due diligence on disposable gloves sourced from Malaysia at the time of our request. They indicated they were examining the modern slavery risks associated with raw materials and additives for their drug manufacturing as the initial priority. They indicated their supplier list was confidential. They requested any information we had about the human rights situation in factories producing disposable gloves in Malaysia, which we agreed to share.

Bristol-Myers Squibb replied on 4 September 2021 and named two of their main suppliers of disposable gloves. The Synod will follow up with these suppliers.

## 2.4 IT Hardware

We recognise that there may be a high risk of modern slavery in technology hardware. Therefore, we conducted research to identify the specific risks in the supply chains of the reporting entities, with the findings so far available at [www.victas.uca.org.au/news-events/uca-statements/](http://www.victas.uca.org.au/news-events/uca-statements/).

The initial two areas of risk we began investigating were reports of forced child labour in cobalt production in the Democratic Republic of Congo to be used in lithium-ion rechargeable batteries and possible modern slavery in Chinese factories producing electronic hardware.

On 2 August 2021, we attempted to make contact with:

- ▶ AfreWatch,
- ▶ the Plateforme des Organisations de la Societe Civile intervenant dans le secteur minier,
- ▶ the US-based Carter Center,
- ▶ the Fund for Global Human Rights,
- ▶ the Initiative pour la Bonne Gouvernance et les Droits de l'Homme and Action pour la defense des droits humains

The intent of this was to gain a current assessment of the situation with regards to modern slavery in the mining industry in the Democratic Republic of Congo. AfreWatch replied that there were significant problems with people mining cobalt in artisanal and small-scale mining. The miners are getting paid less than the value of the mineral on the international market. Further, often miners are only paid for the cobalt, and the buying companies take the copper associated with it for free. In addition, there are reports of underpayment for the minerals through buyers falsely inflating the moisture content or falsely reducing the weight of minerals being purchased. The situation contributes to poverty amongst workers. They indicated a significant reduction in the use of child labour in artisanal mining in the last few years. They expressed concerns that international buyers of cobalt were willing to invest in traceability projects of the cobalt, but not in addressing the causes of poor working conditions in the mines.

Through both the Commonwealth Government National Roundtable on Slavery and Human Trafficking and the Australian Border Force Modern Slavery Expert Advisory Group we asked the Commonwealth Government to facilitate a working group on the modern slavery risk in technology hardware with reporting entities. Given that technology hardware products are likely to be common to the vast majority of reporting entities, including the Commonwealth Government itself, it would make sense that reporting entities adopt a common position on addressing the risks of modern slavery in technology hardware. The Commonwealth Government responded by stating they were starting with a working group involving themselves and the State and Territory Governments.



## 2.5 Solar Panels

The Synod became aware in August 2021 of a report by the Helena Kennedy Centre for International Justice at Sheffield Hallam University published in May 2021<sup>8</sup>, of the use of forced labour in the production of solar panels in China. Congregations within the Synod that are the responsible body for property may seek to have solar panels installed. These purchases may occur at the local congregation level without the knowledge or oversight of the Synod office. Thus, at the time of writing, the JIM Cluster is preparing written material for congregations about purchasing solar panels with a lower risk of modern slavery in their supply chain.

Initial investigations by the Synod suggest that the risks of modern slavery being in the supply chains of most solar panel systems is high.

## 2.6 Garments

U Ethical holds shares in the apparel corporation Inditex. We are aware of reports that Inditex is sourcing products from suppliers in China and there is the risk of modern slavery relating to the Uyghur ethnic group.<sup>9</sup> U Ethical wrote to Inditex on 28 September 2021 seeking a meeting to discuss how they were managing the risks of modern slavery in their supply chain from China.

In late April 2020, the Australian Strategic Policy Institute published a report on allegations of forced labour by the Chinese Government of the Uyghur ethnic group.<sup>10</sup>

On 1 July 2020, the US Departments of State, Treasury, Commerce and Homeland Security issued a joint advisory to businesses with supply chain exposure to entities in Xinjiang.<sup>11</sup> The advisory warned of the risk of forced labour in the production of goods in the Xinjiang Uyghur Autonomous Region. The advisory also warned there were credible reports that the Chinese Government had facilitated the mass transfer of Uyghurs and others from Xinjiang to factories across China, including under conditions of forced or involuntary labour.<sup>12</sup>

Media reports indicated the presence of forced labour in cotton production in the Xinjiang region of China.<sup>13</sup> The allegation is that hundreds of thousands of people, including a large proportion of Uyghurs, have been forced to harvest cotton. Xinjiang cotton accounts for more than 80% of China's cotton and a fifth of global cotton production.<sup>14</sup>

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- 8 Laura T. Murphy and Nyrola Elima, 'In Broad Daylight. Uyghur Forced Labour and Global Supply Chains', Helena Kennedy Centre for International Justice, Sheffield Hallam University, May 2021.
- 9 End Uyghur Forced Labour, 'Statement: Coalition position regarding Inditex and the Uyghur forced labour crisis', 26 April 2021, [www.enduyghurforcedlabour.org/news/statement-coalition-position-regarding-inditex-and-the-uyghur-forced-labour-crisis/](http://www.enduyghurforcedlabour.org/news/statement-coalition-position-regarding-inditex-and-the-uyghur-forced-labour-crisis/)
- 10 Danielle Cave, James Leibold, Kesley Munro and Nathan Ruser, *Uyghurs for Sale*, (Australian Strategic Policy Institute, Report No. 26, 2020).
- 11 US Department of State, US Department of the Treasury, US Department of Commerce and US Department of Homeland Security, "Xinjiang Supply Chain Business Advisory", July, 1, 2020.
- 12 Ibid., 2.
- 13 Sam Meadows, "Top labels urged to ban Xinjiang cotton", *The Age*, December, 17, 2020.
- 14 Cathleen Cimino-Isaacs, Christopher Casey and Katarina O'Regan, *Section 307 and U.S. Imports of Products of Forced Labor: Overview and Issues for Congress*, (Washington: Congressional Research Service, December, 7, 2020), 16.



In March 2020, the Fair Labor Association called on the Chinese Government to end forced labour and other human rights abuses in Xinjiang and directed their member businesses to review their sourcing relationships in Xinjiang.<sup>15</sup> Subsequently, the Fair Labor Association banned its member businesses from sourcing, directly or indirectly, products from Xinjiang.<sup>16</sup>

Investigations allege that agricultural products, cotton, textiles, apparel, footwear, electronics, food products, mining, chemicals, and medical equipment are high-risk products in China's production involving forced labour.<sup>17</sup>

On 12 January 2021, the UK Foreign Secretary, Dominic Raab, told the UK House of Commons there was widespread use of forced labour of Uyghurs.<sup>18</sup> He stated the evidence of the human rights violations were supported by a large, diverse and growing body of evidence. That includes:

- ▶ First-hand reports from diplomats who visit Xinjiang and the first-hand testimony from victims who have fled the region;
- ▶ There is satellite imagery showing the scale of the internment camps, the presence of factories inside them, and the destruction of mosques; and
- ▶ There are also extensive and credible third party reports from NGOs such as Human Rights Watch and Amnesty International, with the UN and other international experts also expressing very serious concerns.



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15 "Fair labour Association prohibits member companies from sourcing from Xinjiang, China", *Business and Human Rights Resource Centre*.

16 Ibid.

17 Cathleen Cimino-Isaacs, Christopher Casey and Katarina O'Regan, *Section 307 and U.S. Imports of Products of Forced Labor: Overview and Issues for Congress*, (Washington: Congressional Research Service, December, 7, 2020), 16.

18 Dominic Raab, "Human rights violations in Xinjiang and the government's response: Foreign Secretary's statement", January, 12, 2021.



## 3. Synod of Victoria and Tasmania

The Synod is one of six councils of the Uniting Church in Australia. It has oversight, direction and administration of the worship, witness and service of the Uniting Church in its region of responsibility, Victoria and Tasmania. Within our Synod, there are eight Presbyteries which are regional councils of the Church and over 500 individual Congregations, each with their church council. To support our central role, a body referred to as 'Synod Ministries and Operations' (SMO) has been established to resource the wider Church and provide administrative and support services.

As a religious body, our operations focus on providing worship and missional services amongst the wider community. In our role of resourcing the Church and providing further learning in theology, we have established the Pilgrim Theological College, which provides accredited studies in theology, philosophy and ministry. We also offer a range of missional services to the community across the life of the Church, such as operating campsites and opportunity shops, emergency relief, community support services, and social groups.

In delivering services to the community, we operate a grants program to provide direct financial support for a wide range of initiatives across the life of the Church, including grants to Uniting. Other key areas of spend include property maintenance and development, information technology, insurance and utilities.

### 3.1 Assessment of modern slavery risk in our supply chain

Our risk assessment focused on understanding our spend and supply chain through spend analysis and categorisation, desktop research of suppliers, and supplier engagement in key risk areas. The vast majority of our tier-one suppliers are local, and due to a lack of detailed supplier data, we did not undertake a geographic risk assessment of our suppliers. This work was completed in partnership with our JIM Cluster, which coordinated a range of supplier investigations for all the reporting entities, as detailed in section 2.

#### 3.1.1 Synod Ministries and Operations

The below table provides an overview of some of the inherent risk spend categories identified.

Spend category	Comments
Property maintenance and development	<p>The majority of spend relates to the labour costs of contractors, with the key risk pertaining to the manufacturing supply chain of materials and parts, which is many tiers down SMO's supply chain. While this is a material spend category, we have very little bargaining power relative to the broader property industry. There are also difficulties in investigating these risks, with limited product transparency available in many instances.</p> <p>SMO uses preferred contractors wherever possible. In procuring contractors for work, the cost is not the only consideration and proposals are assessed on their achievability to prevent underquoting. Underquoting may increase the risk of modern slavery in the supply chain.</p>



<p><b>Information technology (IT) hardware</b></p>	<p>With a largely office-based workforce, we have material spend on electronic hardware. We recognise that there is a high risk of modern slavery in IT hardware. This continues to be an area of active investigation coordinated by our JIM Cluster, as reported in section 2.4 of this statement.</p>
<p><b>Food services</b></p>	<p>While procurement of food services/products for the SMO office is minimal, this is a material area of spend for Uniting Church Camping. This includes a mix of fresh and processed foods from both local suppliers as well as larger distributors.</p> <p>Food services are considered to have a higher risk for modern slavery due to the nature of labour used in some parts of the agriculture industry. Therefore, the JIM Cluster coordinated a central investigation into key suppliers of food services across Synod entities, as reported in section 2.2 of this statement.</p>
<p><b>Cleaning services</b></p>	<p>A significant change from FY20 to FY21 included moving our main office from an office building we owned and managed to leasing office space from a building managed by Charter Hall. They are part of the Cleaning Accountability Framework.</p> <p>Given the possible risk related to cleaning services, the JIM Cluster undertook an assessment of Charter Hall's cleaning contractor for the building. Charter Hall has certified several of its buildings under the Cleaning Accountability Framework. While 130 Lonsdale is not one of those buildings certified under the CAF, Charter Hall advised they are currently considering a robust and scalable model to address modern slavery risks across all the properties.</p>

### 3.1.2 Congregations and presbyteries

A risk assessment of congregation and presbyteries spend using financial reporting available from our congregations identified the following spend categories which may include modern slavery risks in the supply chain.

Spend category	Comments
<p><b>Property maintenance and development</b></p>	<p>The majority of spend relates to the labour costs of contractors, with the key risk pertaining to the manufacturing supply chain of materials and parts, which is many tiers down the supply chain.</p> <p>Congregation's property maintenance and development projects with material spend are overseen and coordinated by the Synod Ministries and Operations' Property Services Team. This spend is therefore subject to Synod Ministries and Operations procurement practices.</p>



<p><b>Information technology (IT) hardware</b></p>	<p>Financial data available indicates material congregation spend on electronic hardware. There has been a shift towards the online worship environment, partly in response to COVID-19. The change is also due to the longer-term strategies of some congregations to have a stronger online presence. A significant portion of this equipment is procured via Synod Ministries and Operations' IT Team.</p> <p>This continues to be an area of active investigation coordinated by our JIM Cluster, as reported in section 2.4 of this statement.</p>
<p><b>Food services</b></p> <ul style="list-style-type: none"> <li>– Fresh fruit and vegetables</li> <li>– Tea and coffee</li> <li>– Chocolate</li> </ul>	<p>Many of our congregations procure foods from local grocery stores to share at various community gatherings. While a low spend category for individual congregations, we recognise the inherent risk in this sector and note that the collective spend across congregations is material. We have developed informative posters to spread awareness on modern slavery risks, including advice on reducing risks such as buying Fairtrade where possible.</p> <p>The JIM Cluster coordinated a central investigation into key suppliers of food services across Synod entities, as reported in section 2.2 of this statement.</p>
<p><b>Disposable gloves</b></p>	<p>Many of our congregations procure foods from local grocery stores to share at various community gatherings. While a low spend category for individual congregations, we recognise the inherent risk in this sector and note that the collective spend across congregations is material. We have developed informative posters to spread awareness on modern slavery risks, including advice on reducing risks such as buying Fairtrade where possible.</p> <p>The JIM Cluster coordinated a central investigation into key suppliers of food services across Synod entities, as reported in section 2.2 of this statement.</p>

### **3.2 Processes and controls to mitigate modern slavery risks**

SMO provides oversight on the terms for employment to ensure appropriate conditions for those people employed across the Church. SMO staff are protected under approved enterprise bargaining agreements that are subject to periodic review and renegotiation. A central payroll service is utilised by most presbyteries and congregations, helping to ensure pay and entitlements are accurately and consistently applied.

SMO uses a decentralised procurement approach with minimal oversight and reporting for routine procurement activities. Since our previous statement, we have worked on embedding controls to ensure that modern slavery and ethical sourcing more generally, is a key consideration throughout the procurement process – see section 3.3 below.





Our analysis is based on the US Department of Labour List combined with our knowledge of sector risks from the JIM Cluster. Where potential risks are identified, we work in consultation with our JIM Cluster to investigate through engagement with our supply chain to understand the risk better, and if confirmed, to lobby for change through our suppliers. Where we are unsatisfied with the response, we would then consider seeking an alternate supplier(s).

Under the inter-conciliar operating model, the Synod does not direct the activities of presbyteries and congregations, including how they undertake procurement, nor is there detailed reporting concerning procurement. Annual survey reporting from congregations has been improved since our last Statement to capture estimated spend in key risk categories. However, transparency of transaction/supplier level detail of spend remains limited.

### 3.3 Steps taken for remediation and improvement

#### Steps taken since last Modern Slavery Statement

While COVID has significantly impacted our resources and capacity, causing delays in some planned work, we have achieved most of what we set out in our previous Statement.

Through the Synod's JIM Cluster, we have continued to engage with material suppliers from those spend categories identified to have higher risks of modern slavery to better understand the supply chains and address potential risks therein. This engagement is outlined in section 2 of this statement.

We have finalised an updated procurement policy with supporting templates that embed modern slavery throughout the procurement process.

We have updated annual financial survey reporting from congregations to include estimated spend of key risk categories that will help to understand the risk exposure and direct future activities. In addition, recognising the limited ability that Synod has to direct and oversee the procurement activities of presbyteries and congregations, we have developed a resource to inform and educate the wider Church on this risk with practical tips for how to mitigate the risk.

#### Our Future Plans

In our continuous commitment to identify and combat modern slavery risks, we aim to:

- provide modern slavery risk awareness training to our key staff involved in procurement activities;
- continue to investigate high-risk categories of spend;
- ongoing engagement with suppliers to identify and mitigate modern slavery risks.



## | 4. Uniting

### 4.1 Introduction

Uniting (Victoria and Tasmania) Limited ('Uniting') is one of the largest community service providers across Victoria and Tasmania, with over 3,700 employees and 2,400 volunteers.

Uniting is the community services organisation of the Church and was formed via the transfer of operations, assets and liabilities from 21 agencies on 1 July 2017. Uniting delivers a broad range of programs and services in the areas of crisis and homelessness, alcohol and other drugs, child, youth and families, mental health, disability, early learning, employment, and aged care.

Uniting Housing (Australia) Limited and Uniting Housing (Victoria) Limited outsource a range of operational and administrative services to Uniting. The outsourcing arrangement includes end-to-end procurement of all goods and services. For that reason, this modern slavery statement is being made by Uniting on behalf of all three entities.

As well as providing services directly, Uniting also partners with other community service providers to deliver services. An example is the Disability and Carer Support Program, in which Uniting participates as part of the Victorian Carer Gateway Consortium.

Uniting's significant areas of procurement are in infrastructure-related products and services (property and ICT) and frontline labour to support the broad range of programs and services.

Except for property, ICT and other significant projects, procurement at Uniting is mainly decentralised. The procurement function provides policy and governance for procurement across the organisation and the processes and tools used to purchase and contract suppliers of goods and services. Functionally, individual business groups conduct their own procurement activities and engage with the central procurement function where the materiality or complexity warrants assistance. Property and ICT administer procurement from their centralised functions.

### 4.2 Assessment of modern slavery risk in our supply chain

Uniting primarily procures infrastructure (Property and ICT) and frontline labour to support the range of programs and services we provide to the community. ICT has the highest risk profile of these three key procurement streams due to the supply chains of materials and support services that extend into geographic regions known to present modern slavery risk. Property has a lower risk profile, with risks mainly centred around the supply of furniture and fittings that could originate from geographic areas known to present modern slavery risk. Frontline labour has a relatively low-risk profile based on a labour force that is grounded in Australia.

Uniting's First Modern Slavery Statement, made twelve months ago, sought to identify modern slavery risk in our supply chain through a two-prong approach. The two prongs were surveying the top 10 suppliers in each of Property and ICT as well as profiling of Uniting's supplier base, which was undertaken by the Synod's Justice & International Mission (JIM) Cluster.



#### 4.2.1 Information Communication & Technology (ICT)

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The findings from our work have revealed that generally critical ICT equipment is only available in Australia via intermediaries (resellers), and the manufacturer has little presence in Australia. Resellers were unable to respond on behalf of other parties due to legal liability, and as such, had to draw upon reporting in other key jurisdictions such as in the State of California (United States) *Transparency in Supply Chains Act 2010* and in the United Kingdom *Modern Slavery Act 2015*. California is the jurisdiction housing headquarters for many major multinational ICT suppliers. This analysis indicates that major global suppliers of ICT equipment and services are committed to practical undertakings to address the risks of modern slavery. Also, Australian domiciled entities intend to comply with required mandatory reporting and actions.

Uniting continues to maintain the same supply relationships with these top 10 ICT suppliers. Investigation of the supply chains of these entities by the Synod continues as outlined in Section 2 of the statement.

Uniting continues to be committed to the ethical sourcing of ICT equipment and services and expects that suppliers and partners continuously show alignment to this core value.

#### 4.2.2 Property – Asset Management

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The findings from our analysis in this area revealed that Uniting contracts with several small-scale local area contractors. The most significant risk in this area is employers sourcing labourers and low skilled employees at below award rates, but not of modern slavery. The dangers of exploitation and wage theft are mitigated by:

- ▶ these contracts generally being associated with trades that are often unionised;
- ▶ Uniting facility management staff being experienced and cognisant of the inherent risk in the sector and the potential reputational risk to the organisation of inappropriate practices being revealed; and
- ▶ competitive quoting undertaken by staff familiar with the industry who review and check bids against estimated hours and industry pricing.

During 2021, Uniting has repositioned its facilities management activities under a new Housing and Property division. It is currently finalising new contract and procurement precedents that will be used to engage suppliers involved in development and facility maintenance. The work is expected to strengthen further the due diligence process in respect of supplier selection. These template documents incorporate specific references to modern slavery risk and management of such.

#### 4.2.3 General

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In preparing for Uniting's First Modern Slavery Statement, Uniting profiled our supplier register to identify high-risk suppliers and industry sectors that potentially required investigation by leveraging the support of the Synod's JIM Cluster.

The JIM Cluster undertook this profiling exercise again in 2021 using a materiality threshold of \$50,000. As a result, five higher-risk suppliers were identified that were associated with supplying Uniting with PPE, seafood, horticultural products and products containing palm oil.



These suppliers are subject to further investigation and engagement, as outlined in Section 2.

Suppliers are identified as higher risk by being known to source products on the US Department of Labour list for goods of higher risk of forced labour in their production ([www.dol.gov/sites/dolgov/files/ILAB/ListofGoods.pdf](http://www.dol.gov/sites/dolgov/files/ILAB/ListofGoods.pdf)) or where the JIM Cluster is aware of reports or research that has previously identified the presence of modern slavery in the production of a good or service.

## 4.3 Processes and controls to mitigate modern slavery risks

Controls continue to be strengthened in Uniting's procurement and contracting processes to ensure that modern slavery is a key consideration throughout the procurement process.

### **POLICY**

A working group has been established to broadly develop Uniting's framework for Social Procurement, of which modern slavery is a key pillar.

### **CONTRACT MANAGEMENT**

Uniting uses Coupa, a well-recognised leading global solution to manage the majority of significant spending across all categories of goods and services. We are expanding our use of Coupa to also store electronic versions of all supplier contracts in our system. A custom field is being included in the upload to identify any supplier contracts where there is a risk of modern slavery.

### **COLLABORATION WITH OTHER UNITING ENTITIES**

Uniting has commenced discussions with several other Uniting Church entities in different states across Australia that are part of the Procurement Hub (outlined below) to collaborate in our fight against modern slavery. Part of the collaboration would be to share costs of modern slavery investigation work where we have mutual supply dependencies.

### **PROCUREMENT HUB**

Uniting participates in a collaborative procurement arrangement with seven other Uniting Church entities across Australia known as the UCA Procurement Hub.

Accenture is currently contracted to provide services to the Hub, including establishing supply arrangements for commonly procured goods and services. The Uniting Church entities have collaborated to ensure that Accenture is accountable for making modern slavery part of supplier selection criteria when undertaking sourcing activities.



## 4.4 Steps taken for remediation and improvement

### Steps taken to date

- We have profiled our supplier register to identify high-risk suppliers and industry sectors.
- Commercial documentation continues to be improved with greater emphasis on modern slavery.
- We will make visible any suppliers that we have identified as having modern slavery risks by using new functionality in our contract management system.
- The Procurement Hub in which Uniting is a participant assesses modern slavery risks as part of supplier selection criteria. The engagement is outlined in section 4.3 of this statement.

### We commit to continuously improve our processes to identify and combat modern slavery risks. In doing so, we will:

- Develop a Social Procurement Framework to include modern slavery as a key pillar to provide a methodology of assessment alongside value-for-money decision-making when purchasing.
- Review the Procurement Policy to ensure that the Social Procurement framework is interoperable with the Policy.
- Promote awareness and active evaluation of modern slavery risks to all staff who are involved in procurement activities.
- Ensure contract templates include appropriate clauses relating to anti-slavery laws.
- Continue to investigate high-risk categories of spend.
- Continuously engage with suppliers to identify and mitigate modern slavery risks.





## | 5. U Ethical

### 5.1 Introduction

We are an ethical investment and responsible manager with approximately 25 employees, primarily office-based and located in Melbourne Australia. Our core business is issuing and managing investment products. We also provide loans to commercial borrowers and community organisations.

Our investment process applies strict ethical screens. We seek to invest in companies that promote human welfare and dignity and environmental sustainability, with positive environmental, social and governance (ESG) ratings and with strong alignment to the United Nations sustainable development goals. We avoid industries that are detrimental to society or the environment.

We are also a social enterprise. The majority of our operating surplus forms a community contribution made via the Uniting Church in Australia, Synod of Victoria and Tasmania. The Synod uses these funds to support social justice advocacy and community programs.

We are governed by an independent board of directors. The board has established three committees to advise it on key governance areas: the investment committee; the audit, risk and compliance committee; and the people and nominations committee. The board provides strategic guidance and effective oversight of the company and management.

We consider modern slavery an important, albeit complex, topic and seek to contribute to the elimination of these practices across the world. Our strategy to identify and manage modern slavery risks involves first determining the appropriate standards and then incorporating these into our ethical investment methodology, our ongoing engagement with portfolio companies, as well as with our key suppliers and service providers.

### 5.2 Assessment of modern slavery risk in our supply chain

#### 5.2.1 Investments risk assessment

Modern slavery risk assessment methodologies within the asset management industry vary in the level of detail and depth. U Ethical prides itself in being an industry leader in responsible investment, and our investment team uses a range of tools and resources to assess potential modern slavery risks within the companies in our portfolios.

These include evaluation of controversies highlighted through MSCI ESG Research's screening tools, controversies alerts, broker research, and the ISS proxy voting benchmark data's (U Ethical adopted ISS's Socially Responsible Investment policy framework), as well as modern slavery exposures identified by the Justice and International Mission (JIM) Cluster. Through a combination of quantitative screening coupled with active direct qualitative assessment of all companies considered for portfolio inclusion, we integrate environmental, social and governance (ESG) analysis into our process for creating long-term sustainable value for our investors. We address areas of concern directly with our portfolio holdings in our engagement activities and also actively vote through our proxy adviser or by direction.



For example, in cases where we receive an unsatisfactory company response on ESG related controversies, or in cases of egregious behaviour, we will vote against at least one of the following (in descending order):

- ▶ The Chair of the board;
- ▶ The Chair of the Nominations Committee;
- ▶ A member of the Nominations Committee; or
- ▶ The longest-serving director seeking re-election.

We currently invest in securities issued by approximately 100 companies across our cash, fixed income and equity products. Our portfolio holdings are published on our website at [www.uethical.com](http://www.uethical.com). These companies are domiciled in Australia, the US, Europe, the UK and Japan, but have operations and complex supply chains across a wide range of developed and emerging markets.

We have examined and continuously track the exposures of our portfolios, which were exposed to nine of the eleven Global Industry Classification Standard (GICS) sectors.

This identified key risks related to modern slavery within the consumer discretionary, consumer staples, healthcare, industrials, information technology and real estate sectors. Fixed income holdings also included exposure to government and not-for-profit organisations, such as the Commonwealth of Australia and the University of Sydney, as well as direct lending to a range of commercial and community borrowers, none of which flagged material risks.

Through a process of active engagement and peer collaboration, U Ethical encourages all portfolio companies with exposure to modern slavery risks to implement robust supply-chain management strategies.

We believe that as community expectations increase for companies to exercise ethical sourcing and supply chain standards, the focus on this important component of ESG policy will demand a more rigorous response from the investment industry and the corporate sector, as well as in consumer behaviour. Our active approach in heightening awareness is designed to increase corporate transparency and to contribute to growing corporate recognition of and action on modern slavery issues.

In addition to the direct overview and analysis of our portfolio exposures, U Ethical collaborates with other active practitioners of socially responsible investment to raise awareness of modern slavery considerations and to maximise the impact of efforts to alleviate its consequences.

### **5.2.2 Supply chain risk assessment**

We applied a practical approach to assessing, prioritising and mitigating salient modern slavery risk where we have the highest spend in our business. We identified and categorised 10 tier-one suppliers and service providers (“suppliers”) in the financial year to 30 June 2021. We analysed, to varying depths, the risk clusters based on industry sectors, operating jurisdictions, business model, products or services provided and spend. The risk indicators applied were:

- ▶ identifying whether a supplier’s operations take place in repressive regimes;
- ▶ reviewing publicly available media/legal reports that indicated labour exploitation by our suppliers; and
- ▶ engaging with our suppliers by spend of above \$50,000 by requesting the completion of our in depth questionnaire.





### **GEOGRAPHIC RISKS**

The majority of our tier-one suppliers only operate in low-risk countries. All top ten suppliers by spend (transaction >\$50k) operate domestically. Five of these tier-one suppliers have offices in multiple locations, with four of the five suppliers have their head offices in either the UK or USA, and the remaining supplier is based in Australia.

### **PRODUCT AND SERVICE TYPES**

U Ethical's top ten suppliers provide products/service types in relation to account/payroll; IT services; custody; auditing and consulting; employment placement; technical services; and insurance. The modern slavery risks associated with these suppliers are assessed as low.

Our largest spend relates to the administrative and support services provided by Synod Ministries and Operations, including property services (building management, cleaning, office supplies and furniture) and IT services. We acknowledge the Synod efforts in ensuring it has appropriate processes and procedures to assess and remediate modern slavery risks within its operations.

The remaining 59 suppliers are in education; human resources; food services; consulting; telecommunications; and financial services. The modern slavery risks associated with these suppliers are also assessed as low.

### **INDIVIDUAL RISKS**

We conducted a media search of publicly available material on U Ethical's tier-one suppliers using global risk databases - Refinitiv and the MSCI rating, with neither identified any adverse results.

A modern slavery risk questionnaire was sent to our top ten suppliers by spend. The questionnaire was divided into four categories: 1) sector and industry employment population; 2) entity and structure; 3) products and services; and 4) geography. 90% of suppliers have responded and provided detailed information as requested. Of the ten suppliers, seven have their modern slavery statements on their websites and the remaining three are Australian based firms which do not require a statement. Of the firms that have responded, all have provided appropriate information in relation to employment and codes of conduct either via their modern slavery statements or by confirmation via their response to the questionnaire, and in some instances by providing relevant policies.

## **5.2.3 Investments and operations**

With the aim of delivering sustainable long-term investment outcomes, our ethical investment framework integrates ESG factor analysis alongside quantitative and qualitative assessment across all asset classes. Through our investor stewardship, we actively encourage portfolio companies to adopt best-practice ESG standards. Extensive ethical and ESG screening takes place before any investment decision is made. The investment team discusses emerging ethical and ESG controversies as they arise, including any need to address a specific issue with a particular company.

Our ESG research incorporates a range of human rights factors and assesses company performance against these based on their materiality to the business. We expect the companies that we invest in to meet internationally recognised human rights standards and to accept responsibility for this throughout their supply chain. When defining our investable universe, we firstly screen out ethically misaligned companies and companies with highly severe controversy cases (red flags). Following this preliminary evaluation, we run detailed screens to further investigate possible risk exposures and harm that may be caused to people and/or local communities.



U Ethical's modern slavery/human right screen is an analysis that spans across controversy cases, an overview of business segments and regional exposure at low-medium-high exposure and a diversity of factors that cover, among others, labour management practices health and safety, controversial sourcing, corruption and instability, etc. This analysis only touches on tier-1 supply chain risk exposures. In order to deepen U Ethical's due diligence in portfolio management, in early 2021 U Ethical joined the Investors Against Slavery and Trafficking (IAST) to advance engagement discussions with portfolio companies.

As part of our investment and stewardship policy and approach, U Ethical engages with companies where it becomes aware of moderate modern slavery issues and aims to ensure that subsequently there is adequate remediation and process improvement activities to deal with these issues.

This will include firm communication with company management noting our concerns and expected actions to be taken, as well as looking to set up a meeting to discuss whether in-person, via video call or teleconference.

The team will continue to monitor these activities over six months to a year and will continue engagement if progress has been made (but not to a satisfactory level).

If the response continues to be unacceptable, U Ethical will then either:

- ▶ Seek further engagement with the company through collaborative efforts with industry peers and working groups, such as Responsible Investment Association of Australasia (RIAA) and the UN principles for Responsible Investments (UNPRI), to lobby for further change. This approach has proven successful in the past and may incorporate public campaigns, forcing shareholder resolutions or continued lobbying; or
- ▶ As existing shareholders, the investment team will also exercise opportunities to query senior management through shareholder briefings; or
- ▶ Exit the share register if the position is seen as immovable and place that company on the excluded companies list.

#### **5.2.4 Operations and supply chain**

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U Ethical complies with Australian employment laws and we therefore identified minimal modern slavery risks in our internal operations. Our third-party procurement and outsourcing comprise mainly:

- ▶ fund services, e.g. custody and fund administration
- ▶ professional services, e.g. legal, audit, tax, design and IT;
- ▶ other services, e.g. advertising, business travel; and
- ▶ administrative and support services provided by Synod Ministries and Operations.

The size and nature of our business as a regulated financial services company means we employ targeted strategies and formal controls to outsourcing of material business activities, which includes, but are not limited to:

- ▶ Pre-appointment - supply chain due diligence check, risk assessment and legal contracts review, including modern slavery risks considerations; and
- ▶ Ongoing monitoring performance against agreed standards set out in the service agreements, including annual review of suppliers who have been assessed as having high risk modern slavery practices.



## 5.3 Steps taken for remediation and improvement

As part of our continuous commitment to be ethically-driven and socially responsible, a number of steps were taken to improve our processes to identify, mitigate and manage any modern slavery risks across both our investments and supply chain.

We anticipate that, as attention on this topic grows and transparency improves, we will continue to strengthen our assessment of business practices and engage with companies where we believe more resolute action is required.

Steps taken to date	
Investments	Supply Chains
<ul style="list-style-type: none"> <li>Our ethical investment policy specifically mandates the review of companies for unacceptable business activities including potential modern slavery controversies.</li> <li>We integrate the evaluation of environmental, social and governance (ESG) factors into our investment process to assist us in managing this risk. The investment team uses a wide range of external resources, such as MSCI ESG Research, sell-side research, company reports, management meetings and industry body publications. A core element of our ethical / ESG review is to examine labour management and sourcing practices, ESG controversies, corporate alignment with labour/human rights charters and conventions, and supply chain considerations, a participant of Investors Against Slavery and Trafficking (IAST) and also a certified B Corp. B Corporations (B Corps) are businesses that meet the highest standard of verified social and environmental performance, public transparency, and legal accountability to balance profit and purpose.</li> <li>We have an independent board that has delegated responsibility to the investment committee to oversee the investment team's activities and the effective implementation of the ethical investment policy. We also have an ethical advisory panel including independent experts which is consulted on key ethical concerns.</li> </ul>	<ul style="list-style-type: none"> <li>We mapped our supply chain to identify general modern slavery risks. We engage with or conduct research on our suppliers to identify our specific modern slavery risks.</li> <li>Our outsourcing and procurement policy is embedded with modern slavery risk management throughout the process, which enables a risk-conscious view and transparency in our supply chain, including:               <ul style="list-style-type: none"> <li>adopting the 'probity' principles;</li> <li>ensuring we continue to apply our code of ethics and conduct in our business practices;</li> <li>setting due diligence criteria and steps, pre and post appointment, to identify, monitor and mitigate modern slavery risks; and</li> <li>adding long-term or material outsourcing and procurement activities into our annual compliance monitoring program.</li> </ul> </li> <li>We review new proposals against the updated risk procedure in the outsourcing policy.</li> </ul>



## Our Future Plans

### Investments

- As the reporting from companies improves over time, we expect to gain further insight into the ways we can improve our monitoring and reporting processes.
- Where we become aware of companies with moderate modern slavery cases, we will engage with them and aim to ensure that subsequently there is adequate remediation and process improvement to address these issues.
- Where we become aware of companies with very severe modern slavery issues, we will exclude them from our portfolios, following initial engagement seeking possible reparation and remediation.
- This will include firm communication to company management noting our concerns and expected actions.
- Where appropriate, we shall seek to meet with company management, in-person or via technology, to discuss our views.
- Our investment team will monitor these activities over the following six months to a year and will continue to engage with the company if progress has been made but not to a satisfactory level.
- If the response continues to be unacceptable, we will then either:
  - 1.** seek further engagement with the company through collaborative efforts with industry peers and working groups, such as RIAA and UNPRI, to lobby for additional change (this approach has proven successful in the past and may incorporate public campaigns, forcing shareholder resolutions or continued lobbying); or
  - 2.** as existing shareholders, query senior management through shareholder briefings; or
  - 3.** exit the share register and place the company on the excluded companies list.

### Supply Chains

With regard to our degree of causation or linkage to our potential modern slavery risks, we acknowledge the need:

- to collaborate with and collect information from our main suppliers enabling us to evaluate our tier one supply chain more effectively; and
- for ongoing risk assessments of products and services provided by our tier-two suppliers.

As part of our continuous commitment to identify and combat modern slavery risks, we aim to:

- provide modern slavery risk awareness training to our team;
- apply the outsourcing and procurement policy and processes and monitor the outcomes;
- engage with suppliers to identify and mitigate such risks; and
- improve existing supplier agreements through the inclusion of modern slavery prevention obligations.

We will continue to evolve our approach and criteria in assessing our suppliers and service providers' risks, especially for modern slavery. This includes:

- conducting ongoing monitoring;
- developing risk indicators to measure our effectiveness in preventing modern slavery in our business and supply chain; and
- identifying improvement opportunities within our supplier and service provider framework.





## | 6 Uniting AgeWell

### 6.1 Introduction

As an organisation of the Uniting Church in Australia, Uniting AgeWell Limited has a long history of providing residential and community services to older Australians across Victoria and Tasmania.

Uniting AgeWell service options include:

- ▶ Residential Care
- ▶ Independent and Assisted Living
- ▶ Home Care
- ▶ Social Support
- ▶ Allied Health and Therapy programs
- ▶ Respite and Carer Support

Uniting AgeWell also wholly owns a subsidiary company, Guardian Network Pty Ltd, that provides in-home support services. This Statement is a consolidated statement that covers both Uniting AgeWell and Guardian Network Pty Ltd.

The organisation's focus is on creating both a good life and quality outcomes for older people. The focus informs the work done every day and is at the heart of our organisational decision-making.

Uniting AgeWell's reason for being is to create caring communities where every older person feels welcome and supported in ways that matter to them.

Our 3,000 staff and 600 volunteers are dedicated to providing the highest quality care and support to clients to enable them to live well with choice and peace of mind; and to live satisfying and fulfilling lives, where they can be active and connected members of their community.

Uniting AgeWell employs people in 152 different roles – from hotel services and administration to nurses, chaplains and care workers – with 72 per cent of staff directly supporting clients in care roles. Uniting AgeWell celebrates diversity and has inclusive work practices and policies to ensure our staff and clients always feel welcome, valued and respected.

Uniting AgeWell Limited is governed by a Board of Directors. Working with the Chief Executive Officer and Senior Executive Team, the directors help shape the organisation's direction through governance and stewardship and provide the highest standards of ethical conduct and practice. Board directors sit on various sub-committees that advise on key governance areas. These include: Audit and Risk; Finance; Mission; Property and Development; Clinical Governance; Governance; and AgeWell Community Advisory Committee.

Find out more about what we do at: [unitingagewell.org](http://unitingagewell.org)



## 6.2 Assessment of modern slavery risk in our supply chain

### MEASURING AND MANAGING OUR SUPPLY CHAIN RISKS

Uniting AgeWell is committed to measuring, managing and eliminating any human rights violations in our supply chain through:

- ▶ **Supplier Sustainability Principles** – to be established to reflect our strong commitment to conducting our supply chain management responsibly and sustainably and setting minimum expectations for supplier compliance with human rights laws as they pertain to employees and business operations. In addition, as part of our broader approach to sustainability, we seek to engage and encourage suppliers and partners who share this understanding and commitment.
- ▶ **Risk management and due diligence** – In 2021-22, Uniting AgeWell plans to enhance risk management processes to include risk-based supplier segmentation to identify suppliers that may pose more significant human rights/modern slavery risks. Existing supplier agreement templates have been updated to refer specifically to the Commonwealth Modern Slavery Act 2018, and new suppliers already contract on these terms.

## 6.3 Processes and controls to mitigate modern slavery risks

### OUR POSITION ON MODERN SLAVERY

Defined as exploitative practices that violate an individual's dignity and human rights, including human trafficking, servitude, forced labour, debt bondage, and wage theft, all forms of modern slavery are serious crimes under Australian law. Uniting AgeWell rejects any form of modern slavery. We are committed to implementing and enforcing effective systems and controls to ensure it does not occur within our own business or supply chains. Wherever we operate, we respect the human rights of our employees, clients, suppliers and business partners, and we aim to identify and manage any risks related to these rights.

### OUR WORKPLACE

We are committed to complying with relevant local and national laws related to human rights and modern slavery concerning our employees and our business operations. As part of Uniting AgeWell's commitment to treating people with respect and dignity as individuals, we do not tolerate any form of discrimination or harassment. We strive to be an equal opportunity employer. We are committed to ensuring our employment conditions align with minimum wages, hours of work, appropriate leave provisions and the ability to sustain the health, safety and wellbeing of our employees, contractors, clients and visitors. We are also committed to creating and maintaining a diverse workforce and an inclusive and safe workplace for all.



## 6.4 Steps taken for remediation and improvement

### MEASURING AND MANAGING OUR WORKPLACE RISKS

As an agency of the Synod of Victoria and Tasmania, Uniting AgeWell has initiated monitoring and review of our quality and risk frameworks, policies, systems and processes. We are dedicating resources to measure, manage and eliminate any human rights violations in our workplaces through:

- ▶ **Policies and governance** – our board leads our directorates to implement strong corporate governance, ensuring all decisions and actions are based on transparency, integrity, responsibility and performance for long-term sustainability.
- ▶ **Ethics and conduct** – we recognise that our employees, contractors, directors and agents must maintain a compliant and ethical approach to business practices. We are committed to dealing honestly and fairly with our clients and managing the risk of unfair client outcomes wherever we operate.
- ▶ **Employee training and awareness** – informing our teams of their obligations to uphold laws, regulations, codes or standards as applicable. In addition to existing training modules, we will create new modules to address the identification and management of human rights issues.

### Steps taken to date

We have profiled our supplier register to identify high-risk suppliers and industry sectors. In addition, we have sought attestations and evidence from our top 10 suppliers. These measures are the first step to gaining transparency across our supply chain, which was a key area of focus for this reporting period.

The Procurement Hub, in which Uniting AgeWell is a participant, assesses modern slavery risk as part of supplier selection criteria.

### Our Future Plans

We commit to continuously improve our processes to identify and combat modern slavery risks. In doing so, we plan to:

- Develop Supplier Sustainability principles to incorporate into a Social Procurement Policy, which includes modern slavery as a critical pillar assessment alongside value-for-money decision-making when purchasing.
- Promote awareness and active assessment of modern slavery risks to all staff who are involved in procurement activities.
- Ensure supplier contracts include appropriate clauses relating to anti-slavery laws.
- Continue to investigate high-risk categories of spend.
- Continuously engage with suppliers to identify and mitigate modern slavery risks.
- Develop key performance indicators to measure effectiveness in preventing modern slavery in any part of our business or supply chains.
- Update relevant Uniting AgeWell policies to reference modern slavery specifically.

