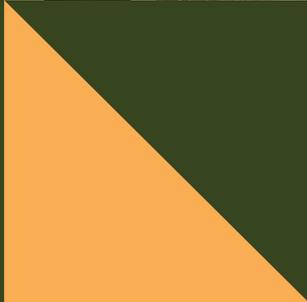
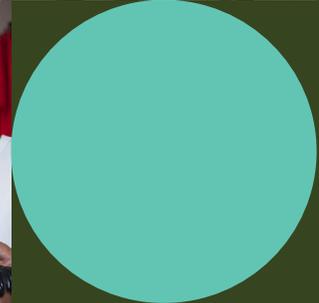


# Modern Slavery Statement

*Financial Year Ending 30 June 2025*

ANGLICAN COMMUNITY SERVICES



Anglicare

This statement, pursuant to the *Modern Slavery Act 2018* (Cth), sets out the actions taken by Anglican Community Services (ABN 39 922 848 563) (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 2025 ('FY25').

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 indicates that there are 50 million people in situations of modern slavery, with 29.3 million of those people located in Asia and the Pacific. Given this, we actively seek to ensure that our staff and supply chains are not involved in modern slavery practices.

In FY25, ACS proactively addressed modern slavery risks by:

- undertaking a focused modern slavery review of our uniform supplier;
- providing modern slavery training for our managers;
- reviewing our contractor agencies that provide care workers within our residential care business operations; and
- reviewing our key contractors by spend and risk.

Our Board and Executive Committee are deeply committed to ongoing action and continuous improvement to assess and address modern slavery risks. We will continue to implement measures to combat forced labour and trafficking in business supply chains, to promote fair and ethical recruitment, and to provide greater support to people who are particularly vulnerable to risks of modern slavery.

This statement was approved by the ACS Board on 10 December 2025.



Signed

A handwritten signature in black ink, appearing to read 'Evelyn Horton'.

Ms Evelyn Horton FAICD  
Chair, Anglican Community Services



## 1. 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, helping meet 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 provide benevolent relief to people in need that reflects the love of Christ, while furthering the work of the Anglican Church Diocese of Sydney by promoting and proclaiming the gospel of the Lord Jesus Christ.

### 1.1 Organisational Structure

ACS is a body corporate incorporated under the powers given to the Synod of the Anglican Church Diocese of Sydney by the *Anglican Church of Australia (Bodies Corporate) Act 1938*. ACS is a charity registered with the Australian Charities and Not-for-profits Commission.

On 1 July 2016, Anglicare Sydney (which was also known as Sydney Anglican Home Mission Society Council) and Anglican Retirement Villages officially merged to become Anglican Community Services. ACS has various other business names related to our services which are publicly listed on the Australian Business Register.

ACS owns Anglican Community Services Investment Holdings Pty Ltd (ABN 68 662 330 154) and is the trustee of Anglicare Foundation Funds ('the Foundation') (ABN 24 086 334 058). ACS also owns other special purpose investment entities which do not currently trade.

Our head office is located at Level 4 MQX4 Macquarie Exchange, 1 Giffnock Ave, Macquarie Park, NSW 2113. During FY25, ACS had a geographical coverage that included greater Sydney and various regions within NSW including Illawarra, Shoalhaven, Central West, North West, New England, and Norfolk Island.



### 1.2 Operations

Our operations are entirely within the Commonwealth of Australia and are comprised of four business units (being Community & Mission, Residential Care, Seniors Living and Housing) and Corporate Support Services (for example, Finance).

Our operations include the provision of:

- retirement living (retirement villages);
- residential care;
- home care services to older people living in their own homes;
- social and affordable housing, particularly to victims of domestic violence and older people at

risk of homelessness (or who are already homeless); and;

- a wide range of community support services, including:
  - mental health and care support;
  - family and relationships services;
  - out of home care;
  - food and financial assistance;
  - sustainable living;
  - support services;
  - advocacy and social research;
  - op shop stores;
  - disaster recovery services; and
  - chaplaincy and pastoral care.



### 1.3 Staff

ACS employed 5,772 staff as at 30 June 2025. The following table shows their employment status and demographic make-up:

- 1,262** Male
- 4,509** Female
- 2,996** Permanent Part-time
- 1,352** Permanent Full-time
- 193** Fixed term Contracts
- 1,231** Casual
- 2,483** Visa holders

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.

#### Contractors and Agency Staff

In FY25, our total spend was approximately \$317 million on goods and services to support our operations. The largest area of spend in FY25 was on property and development (\$88.6 million), as shown in the table on page 7.

Consulting, nursing agencies, allied health and property services are also sectors where ACS draws on outsourced workers. Consequently, in FY25 we conducted a focused review of four of our contracted agencies that provide carers within our residential care facilities (discussed below at paragraph 3.2.2).



#### Suppliers Top 25 Category Spend in FY25

1.	Property & Development:	\$88,666,672
2.	Fixed Assets - Minor CAPEX	\$30,629,095
3.	Renovation Costs	\$17,241,447
4.	Agency or Contract Staff	\$12,683,723
5.	Consulting	\$12,052,591
6.	Client and Resident - Food	\$10,935,457
7.	Cleaning Services - Recurring	\$9,175,490
8.	Client and Resident - Services	\$9,066,741
9.	Building and Infra - Reactive Maintenance	\$8,503,169
10.	Client and Resident - Consumables	\$8,250,785
11.	IT -Software Maintenance	\$8,197,283
12.	Prepaid Workers Compensation	\$6,639,317
13.	Electricity	\$6,147,670
14.	Minor Items and Equipment less than 5K	\$5,527,552
15.	Building and Infra - Planned Maintenance	\$5,305,217
16.	Building and Infra - Preventative Maintenance	\$4,438,174
17.	Prepaid Insurances - General	\$4,411,410
18.	Phone and Data	\$3,922,283
19.	AAH External Services Clinical	\$3,173,937
20.	Grounds and Gardens - Preventative Maintenance	\$2,938,469
21.	Hubfoods Clearing Account	\$2,530,759
22.	Other Expenses	\$2,527,795
23.	Waste Disposal	\$2,340,581
24.	Water	\$2,314,000
25.	IT and Communication Consumables	\$2,091,752



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

### 2.2 Our Supply Chain Risks

We recognise that our corporate and social responsibilities reside in both our own direct activities, as well as our second and third tier supply chains, and accordingly endeavour 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 ('UN Guiding Principles'), we adopt a risk-based approach when assessing human rights risks in our supply chain.

#### 2.2.1 Supplier geography

Amongst our suppliers, the country with the highest number of supplier business operations was Australia. 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.

### Geographic footprint of our third-party suppliers for FY25



Of the 160 suppliers reviewed in FY25, 155 were located in Australia and 5 were located in China.

The above graphic represents the geographic footprint of our third-party suppliers' business operations for FY25.

ACS uses the 'ethiXbase' platform which is an online modern slavery questionnaire to 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 questionnaire for FY25 is discussed below at paragraph 3.2.2.

#### 2.2.2 Sector Risk

Some of our top suppliers by spend, while based in Australia, have a higher risk of modern slavery in their supply chain because 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 generally considered to be of high risk of modern slavery largely due to the nature of the workforce and at times opaque nature of operations. The cleaning sector often does not require tertiary qualifications, and the workforce is low-skilled. Further, those who enter the cleaning sector are often from migrant populations, with potentially limited understanding of English and their legal rights in Australia. As a result, workers in the cleaning industry may be hampered in their ability to bargain with their employers or those with whom they contract, and therefore may be 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 also impact producers, distributors, packers, exporters and caterers. The engagement of labour hire contractors who recruit backpackers and seasonal workers for fruit and vegetable picking on farms and in food processing may experience poor working conditions, passport retention and bonded labour.

**Medical Supplies** A large percentage of the world's personal protective equipment ('PPE') is produced in China and Malaysia. Items of PPE, such as medical gowns and masks, continue to be sourced largely from factories in China, where there are ongoing and significant risks of modern slavery. Recent investigations and government reviews in 2024 confirm that North Korean forced labour remains present in Chinese manufacturing, including sectors producing goods for export. These workers are subjected to forced labour, wage confiscation, and harsh conditions, with their labour sometimes linked to global supply chains for PPE. The UK government has identified PPE — including surgical gowns and masks — as among the highest-risk products for modern slavery in NHS supply chains.<sup>1</sup>

**Property Maintenance** The prevalence of subcontracting in the property maintenance industry can, in some cases, lead to contractual liabilities and obligations diminishing to the point where the human rights of workers on site may go unnoticed. This may occur because compliance oversight has extended to the point that there is little capacity for management and transparency.

1. Freedom United. (2024). *North Korean forced labor and sexual abuse in Chinese factories exposed*. <https://www.freedomunited.org/news/china-north-korean-forced-labor/> [freedomunited.org]

Guide to Identifying and Addressing North Korean Modern Slavery Risk in China. (2024). RightsDD. <https://www.rightsdd.com/guide-to-identifying-and-addressing-north-korean-modern-slavery-risk-in-china> [rightsdd.com];

UK Government. (2024, November). *Government acts to eradicate modern slavery from NHS*. <https://www.gov.uk/government/news/government-acts-to-eradicate-modern-slavery-from-nhs> [gov.uk];

University of Nottingham. (2024, December). *Reducing Modern Slavery in the Health Sector's Supply Chains for Personal Protective Equipment: Stakeholder Engagement Report*. <https://www.nottingham.ac.uk/research/beacons-of-excellence/rights-lab/resources/reports-and-briefings/2024/december/reducing-modern-slavery-in-the-health-sector%27s-supply-chains-for-personal-protective-equipment-stakeholder-engagement-report.pdf> [nottingham.ac.uk].



## Sector Generally known modern slavery risks

**IT Equipment and Software Equipment and Software** IT companies that produce electronic goods may present a risk due to the use of raw materials. For example, cobalt is an essential component of rechargeable lithium-ion batteries. The Democratic Republic of the Congo is home to over 50% of the world's cobalt reserves, and more than 70% of the world's cobalt is mined there. It is estimated that 40,000 children (sometimes as young as 7 years old) work in hazardous conditions in cobalt mines. These children perform dangerous tasks such as digging tunnels, carrying heavy loads, and cleaning cobalt ores with their bare hands, often for less than \$2 per day and without protective equipment.<sup>2</sup>

**Property Development** In the property development industry, opaque subcontracting arrangements and frequent use of labour hire companies can 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 may 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.<sup>3</sup>

2. Humanium. (2025, May 27). *The current state of child labour in cobalt mines in the Democratic Republic of the Congo*. <https://www.humanium.org/en/the-current-state-of-child-labour-in-cobalt-mines-in-the-democratic-republic-of-the-congo/> [humanium.org]; Save the Children. (2024, November 4). *DRC: Cobalt mines, child labour and the green transition*. <https://www.savethechildren.net/stories/drc-cobalt-mines-child-labour-and-green-transition>;

U.S. Department of Labor. (2024). *2023 Findings on the Worst Forms of Child Labor: Congo, Democratic Republic of the*. [https://www.dol.gov/sites/dolgov/files/ILAB/child\\_labor\\_reports/tda2023/Congo-Democratic-Republic-of-the.pdf](https://www.dol.gov/sites/dolgov/files/ILAB/child_labor_reports/tda2023/Congo-Democratic-Republic-of-the.pdf).

3. Business & Human Rights Resource Centre. (2024, July 11). *Pakistan: Report alleges large percentage of kiln workers are modern day slaves*. <https://www.business-humanrights.org/en/latest-news/pakistan-report-alleges-large-percentage-of-kiln-workers-are-modern-day-slavery/> [business-h...rights.org];

Devdiscourse. (2025, July 20). *Trapped in Kilns: The Hidden Child Labor Behind India's Brick Industry*. <https://www.devdiscourse.com/article/law-order/3511656-trapped-in-kilns-the-hidden-child-labor-behind-indias-brick-industry> [devdiscourse.com].



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

#### 3.1 Actions Taken For ACS Employees

##### 3.1.1. Employee Enterprise Agreements

ACS implements measures to help ensure that its own employees are not working under conditions of slavery. For example, ACS requires 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. ACS's employment agreements help ensure that protections under the *Fair Work Act 2009* (Cth) are implemented.

Under ACS's enterprise agreements, employees are hired based on their skills, qualifications and suitability for the role. Employees are also required to declare secondary employment as part of their employee review. This helps to protect worker wellbeing minimising the risk of staff being overworked across multiple jobs. It also assists in checking that visa holders are not exceeding the maximum number of work hours under the relevant visa restrictions. ACS enterprise agreements remunerate employees at a rate no less than the relevant modern award.

Industrial Instrument	Number of Employees
Anglicare Aged Care Enterprise Agreement 2025	3,674
Anglicare Community and Housing Enterprise Agreement 2023	416
Anglicare Community Services Enterprise Agreement 2017	980
SCHADS Award <sup>4</sup>	12
Non award (Salaried Staff)	605
Professional Services Award	17
Health Professionals Award	3
Clerks Award	65



##### 3.1.2 ACS Policies and Procedures

All staff, regardless of their demographic background and vulnerabilities, are protected by ACS's various policies and procedures (and associated training), including ACS's:

- Safeguarding Policy;
- Corporate Social Responsibility Policy;
- Code of Conduct;
- Employment Probity Checks Policy;
- Conflict of Interest Policy;
- Gifts, Prizes and Hospitality Policy;
- Managing Unsatisfactory Performance and Misconduct Policy;
- Preventing Bullying, Harassment and Discrimination Policy;
- Sexual Harassment Policy;
- Diversity, Equity and Inclusion Policy;
- Learning and Development Policy;
- Recruitment and Selection Policy;
- Grievances and Complaint Resolution Procedure;
- Health, Safety and Wellbeing Policy;
- Whistleblower Policy;

- Associated Providers Policy;
- Child Safe Child-Friendly Organisation Policy; and
- Child Safe Reportable Conduct Policy.

In FY25, ACS undertook an organisation-wide review of our policies impacted by the newly introduced *Aged Care Act 2024* (Cth) (Aged Care Act). These policies help ensure that the people we serve are treated with dignity and respect, as well as ensuring legal compliance with applicable legislation.

##### Associated Providers Policy

The Associated Providers Policy introduced by ACS in response to the new Aged Care Act plays a critical role in safeguarding against modern slavery risks in aged care service delivery. ACS is responsible for ensuring associated providers (which may include subcontractors that are not registered providers) who deliver funded aged care services on ACS's behalf comply with the requirements of the new Aged Care Act.

4. SCHADS': Community employees covered by the Social, Community, Home Care & Disability Services Award.

Workers of an associated provider must be screened to ensure they meet the requirements under ACS's Employment Probity Checks Policy for working in an aged care setting. This screening helps prevent the engagement of individuals who may be coerced, trafficked, or otherwise vulnerable to exploitation. Under the Associated Providers Policy, Anglicare commits to monitor and evaluate the performance of Associated Providers, and promptly address non-conformances.

### Safeguarding Policy

ACS's Safeguarding Policy helps ensure people that interact with, or are affected by, ACS are protected from abuse, neglect and exploitation. This is especially relevant to vulnerable people who are at risk of modern slavery. The Policy sets out how Anglicare manages safeguarding risks by:

- having up-to-date and documented risk assessments and controls;
- conducting regular compliance reviews and monitoring ACS's compliance with its legislative and regulatory obligations, including through internal and external audits;
- implementing our Incident Management Policy and Procedures, and ACS's Code of Conduct;
- using rigorous recruitment practices including conducting due diligence checks (for example, employment probity checks) on staff;
- conducting staff training on areas pertinent to safeguarding; and
- maintaining both a confidential and an overt reporting process (including with respect to statutory obligations concerning reportable conduct).

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, our work.

### Whistleblower Policy

The Whistleblower Policy aims to ensure services are provided ethically and legally, and that people can make whistleblower disclosures easily and with protection.

### Volunteers Policy

ACS's Volunteer Policy is an important policy in view of the unremunerated nature of volunteers' contribution and the potential risk this presents. It clarifies when a genuine volunteering arrangement is in place. 1488 volunteers assisted ACS in FY25. The policy helps ensure ACS provides volunteers with adequate resources to fulfil their role; supportive day-to-day management; appropriate training and ongoing support; and health, safety and wellbeing management. ACS deeply values the important role of our volunteers to our vision, mission and values.

### 3.1.3 Work Health Safety and Wellbeing

FY25 showed an increased organisation-wide focus on ACS' work health and safety ('WHS') management where we have embedded WHS into our organisational culture. Initiatives included:

- Regular reviews of WHS processes and performance;
- Leadership accountability and expectations for leaders to promote safety;
- Resource allocation to WHS initiatives;
- The creation of internal working groups;

- Enhanced training and education of staff, volunteers and contractors to maintain and improve WHS;
- Communication and consultation to actively engage workers on WHS matters;
- Encouraging prompt reporting of incidents, hazards and near misses;
- Improved incident response protocols for faster resolution and follow-up on safety incidents;
- Mental health and wellbeing programs improving support for staff, including in relation to psychosocial hazards; and
- Safety-focused refurbishments in residential and community care settings.

### 3.1.4 Modern Slavery Training for ACS Managers

In FY25, ACS had a 96% completion rate of our bespoke modern slavery training. This training assists managers to:

- identify modern slavery risks specific to ACS's high-risk operational areas (including red flags to consider, and identifying who is most at risk);
- conduct modern slavery risk assessments based on the sector / industry risks, product / services risks, geographic risks, and supply chain model risks;
- understand the laws that criminalise modern slavery;
- understand which ACS policies manage modern slavery risks and what protections are available to employees; and
- understand the process to follow where modern slavery is suspected in our operations and supply chains.

## 3.2 Action Taken To Address Risk In Our Supply Chains

### 3.2.1 Policies and Supplier Code of Practice

ACS's policies and procedures relating to procurement, such as our Corporate Social Responsibility Policy, embed human rights considerations into our purchasing decision-making. Suppliers tendering for Anglicare contracts over \$1 million are required to certify to Anglicare their compliance with the Anglicare Code of Practice (the Code), which requires suppliers to:

- implement a policy within their workplace committing to 12 anti-slavery principles to minimise slavery and human trafficking in their workplaces and supply chains;
- establish a process to monitor compliance with the anti-slavery principles; and
- take action to remediate any breaches committed.

Suppliers with a total turnover of more than \$100 million per annum are required to certify to Anglicare their compliance with the *Modern Slavery Act 2018* (Cth). Anglicare may at its discretion give preference in future works and orders to suppliers who demonstrate compliance with our Corporate Social Responsibility Policy.

Further, ACS enshrines modern slavery protections in the contractual arrangements within our supply chains in our template agreements. Additionally, Anglicare's Cyber Risk Assessment includes questions to assess modern slavery risks for all future subcontractors and vendors and demonstrate compliance with the *Modern Slavery Act 2018* (Cth), Anglicare's Supplier Code of Practice and Anglicare's Corporate Social Responsibility Policy.



### 3.2.2 Supplier Modern Slavery Reviews

#### a) EthiXbase Questionnaire

ACS used the ethiXbase online modern slavery questionnaire in FY25 to assess the modern slavery risk profile of a subset of our major suppliers identified through the risk matrix and spend analysis process. The risk ratings from FY24 were used to inform our supplier engagement process for FY25. 58 suppliers were asked to complete the ethiXbase questionnaire because they either returned a high-risk rating from last financial year or were over \$1 million in spend. These suppliers were asked to provide us with documentation evidencing their modern slavery action plan to address and manage the identified risks.

Some suppliers who did not complete the questionnaire provided us with their modern slavery statements and other documentation to evidence how they manage risk within their own operations and supply chains.

#### b) Residential Care Agency Carers – Supplier Modern Slavery Review

Residential care for older people is a key part of ACS's business. We have over 2,400 aged care beds and deliver support at home (including CHSP services) to another 4,200 people. We recognise the modern slavery risks associated with carers due to the high percentage of culturally and linguistically diverse workers. Most care workers across the sector are migrant workers and vulnerable to modern slavery due to:

- language barriers;
- limited understanding of Australian customs and norms;
- lack of awareness of workplace rights and regulations; and
- fear of authority due to concerns regarding their visa status and deportation.

In FY24, we conducted a modern slavery review of four of the eight labour hire agencies Anglicare engages; the remaining agencies were reviewed in FY25. Our contract terms include modern slavery clauses and a right for ACS to conduct modern slavery reviews of the agency. Across the agencies, 97 – 100% of workers were casual / temporary. A notable portion of workers were also visa holding foreign / migrant workers with a high representation of female workers.

A Modern Slavery Review Checklist was returned by all four agencies and based on the information provided it appears that, in relation to the payment of living wages:

- wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark / award standards;
- all workers were provided with written and understandable information about their employment conditions in respect to wages before they entered employment and about the particulars of their wages for the pay period concerned each time they're paid; and
- wages were not deducted as a disciplinary measure and were in accordance with national law. All disciplinary measures were recorded.

In relation to working hours, all four agencies advised that:

- working hours comply with national laws and collective agreements;
- working hours, excluding overtime, were defined by contract, and did not exceed 48 hours per week (or other maximum hour requirements under visa conditions);
- all overtime was voluntary, used responsibly, and compensated;



- workers were provided with at least one day off in every seven-day period or, where allowed by national law, two days off in every 14-day period.

All agencies advised that they have mechanisms in place to manage visa restrictions such as verifying visa restrictions every three months; monitoring expiry dates; or outsourcing verification to a dedicated onboarding platform. Agencies confirmed that they have their own modern slavery training, grievance policy, and work health and safety procedures in place.

#### c) Uniform Supplier – Supplier Modern Slavery Review

In FY25, ACS conducted a focused review of our uniform supplier. The supplier has a small workforce of Australian citizens with predominantly permanent staff. The supplier confirmed:

- Employment is freely chosen. There is no forced, bonded, or involuntary labour and workers are free to leave after reasonable notice without lodging deposits or identity papers;
- Staff have freedom of association and collective bargaining;
- Working conditions are safe and hygienic;
- There is no child labour;
- Staff are paid living wages that meet national legal standards;
- Workers receive clear information about wages and employment conditions;
- There is no unauthorised wage deductions or disciplinary deductions;
- Working hours comply with national laws and international standards;
- Overtime is voluntary and compensated at a premium rate;

- Workers have at least one day off in every seven-day period;
- There is no discrimination in hiring, compensation, training, promotion, termination, or retirement based on personal attributes or affiliations; and,
- Regular employment is provided.

The supplier has implemented the following measures to help ensure modern slavery practices are not occurring within their organisation and supply chains:

- Requiring that all its suppliers:
  - are members of SEDEX or have achieved a certification from Worldwide Responsible Accredited Production (WRAP) and have a meaningful modern slavery policy that influences decisions and fosters better practices.
  - comply with standards outlined by The Ethical Trading Initiative (ETI) for offshore manufacturing and contractor engagement.
  - (for direct suppliers): certify that materials incorporated into their final products are sourced, processed, and manufactured in compliance with modern slavery laws. They enforce this through a Modern Slavery Self-Assessment survey, which suppliers must complete prior to onboarding and annually thereafter. Non-compliance is addressed through a remediation process for minor issues, while major non-conformances result in a trading pause

for further assessment and decision-making.

- Prohibiting suppliers from manufacturing in high-risk countries as identified by sources like the Global Slavery Index.
- Conducting annual independent audits of its suppliers to monitor compliance (both International Organisation for Standardisation (ISO) audits or Worldwide Responsible Accredited Production (WRAP) audits).
- Providing training to key employees, including management and those involved in supply chain operations, to educate them on modern slavery risks and mitigation strategies.

The supplier verified that it maintains work health and safety procedures, conducts regular risk assessments, and provides personal protective equipment to employees. Grievance procedures are in place to allow staff to report concerns confidentially and without fear of reprisal.

The review of our uniform supplier raised no modern slavery concerns.



## 4 How we assess the effectiveness of our actions

As described in the UN Guiding Principles, tracking is necessary for a business to check if its human rights policies are being implemented, to identify reporting periods by setting goals in 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. Over the next reporting period, we will continue to review, monitor, and embed our processes in accordance with the table on page 20.

	Activities	Methods for tracking effectiveness	Status as at FY24
Operations	<b>Annual review of ACS processes to identify and address modern slavery risks in our operations</b>	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.	Ongoing
		Revising policies and processes as and when required to improve the way in which modern slavery is addressed.	Ongoing
		Providing staff training designed to raise awareness of modern slavery risks.	Ongoing
	<b>Review of grievance mechanism</b>	Regularly review reported cases with a view to assess how these were handled, and how the response could have been improved.	Ongoing
Procurement	<b>Conduct a review of the prequalification checks for suppliers to determine if mitigation measures have been consistently actioned</b>	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
		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
	<b>Track the number of high-risk suppliers and levels of awareness among staff</b>	Comparing ethiXbase questionnaire responses as against prequalification documentations (to check for any irregularities).	Completed
		Comparing the results of the ethiXbase questionnaire year on year.	Ongoing
		Identifying the higher risk suppliers via the ethiXbase questionnaire and developing plans for further due diligence measures.	Ongoing
	<b>Supplier engagement</b>	Tracking the number of individuals who have undertaken modern slavery training.	Ongoing
		Conducting periodic checks on suppliers to verify their compliance with the Code.	Ongoing
<b>Further due diligence</b>	Recording the instances of non-compliance and developing corrective action plans as and when required.	Ongoing	
	Engaging further with the suppliers that responded in the modern slavery questionnaire that they have been the subject of a negative human rights review and/or have not implemented controls to protect the health and safety of their workforce to determine appropriate next steps (e.g. remediation, corrective action plans).	Ongoing	

## 5. Goals For Financial Year 2025

Our key modern slavery goal for Financial Year 2026 is to conduct a focused review of ACS' property development and construction suppliers.

## 6. Consultation with any operating entities owned or controlled by ACS

ACS is the Trustee of Anglicare Foundation Funds (ABN 24 086 334 058) (the Foundation) which was established by a Trust Deed dated 31 December 1984. Anglicare Foundation Fund's exclusive purpose is to identify and record gifts that must only be used exclusively for the support of the work of ACS. The Foundation does not have separate operations to 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 68 662 330 154) and other special purpose investment entities which do not trade. Therefore, there was no need for consultation.

## 7. 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 housing options for those who are in need or vulnerable. Our response to a lack of affordable housing included delivering 51 new homes in Dapto, 6 in Moree, and 20 units in Kingswood, with further developments planned for 2026 and the intended use of former retirement living accommodation at Penrith, Winston Hills and Forestville for affordable housing purposes.

Our financial assistance programs include no interest loan schemes, financial counselling, utility bill assistance, rental arrears assistance, bond assistance, medical assistance to help with pharmacy costs, and advocacy support to negotiate lower specialist fees. ACS currently assists 654 older Australians through their social and affordable housing program in the Greater Sydney region.

We believe these are some of the ways ACS helps contribute to addressing 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	
Section 16 (1) (a)	Identify the reporting entity.	4
Section 16 (1) (b)	Describe the reporting entity's structure, operations, and supply chains.	4-7
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.	12-18
Section 16 (1) (e)	Describe how the reporting entity assesses the effectiveness of these actions.	19-21
Section 16 (1) (f)	Describe the process of consultation with any entities the reporting entity owns or controls.	21
Section 16 (1) (g)	Any other information that the reporting entity, or the entity giving the statement, considers relevant.	21



Anglicare

[anglicare.org.au](http://anglicare.org.au)