



Uniting Church in Australia  
SYNOD OF VICTORIA AND TASMANIA



FY22

# MODERN SLAVERY STATEMENT



**Uniting**





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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 (Tas.) (**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 FY2021/22 to assess and address modern slavery risks within the reporting entities.

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

- ▶ Continuing efforts to seek partnerships in investigating supply chains of concern and to leverage buying power to reduce modern slavery risks;
- ▶ Continuing to build relationships with our suppliers of goods and services identified as higher risk of having modern slavery in their supply chains; and
- ▶ Continuing to improve our process to reduce the risk of modern slavery being associated with our operations.

The reporting entities established a central oversight committee with membership from each entity that met regularly to discuss and collaborate on modern slavery related issues and prepare this statement. 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 UCAPT and UCAPT pursuant to 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 statutory corporations governing the Uniting Church in Australia and its Institutions in Victoria and Tasmania on November 2, 2022.

### **Bob Hodges**

Chairperson

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



## Structure of this Statement

The Uniting Church in Australia Victoria and Tasmania Group is pleased to make this Statement the contents of which are arranged as listed below.

1. **About the Uniting Church in Australia:** provides background on legal structures of the Uniting Church in Australia Victoria and Tasmania Group.
2. **Justice and International Mission:** sets out the history of the Uniting Church in Australia's long association with work towards eliminating modern slavery and identifies key industries relevant to the Uniting Church in Australia Victoria and Tasmania Group.
3. **Synod of Victoria and Tasmania:** outlines the efforts made in the Uniting Church in Australia's structures to eliminate modern slavery.
4. **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.
6. **AgeWell:** outlines the efforts made in AgeWell's structures to eliminate modern slavery.

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## 1. About the Uniting Church in Australia

The Uniting Church in Australia was formed by the amalgamation of the Presbyterian, Methodist and Congregational churches in 1977. The Uniting Church in Australia, 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.

1 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**).

2 Which is Schedule One to the UCA Acts



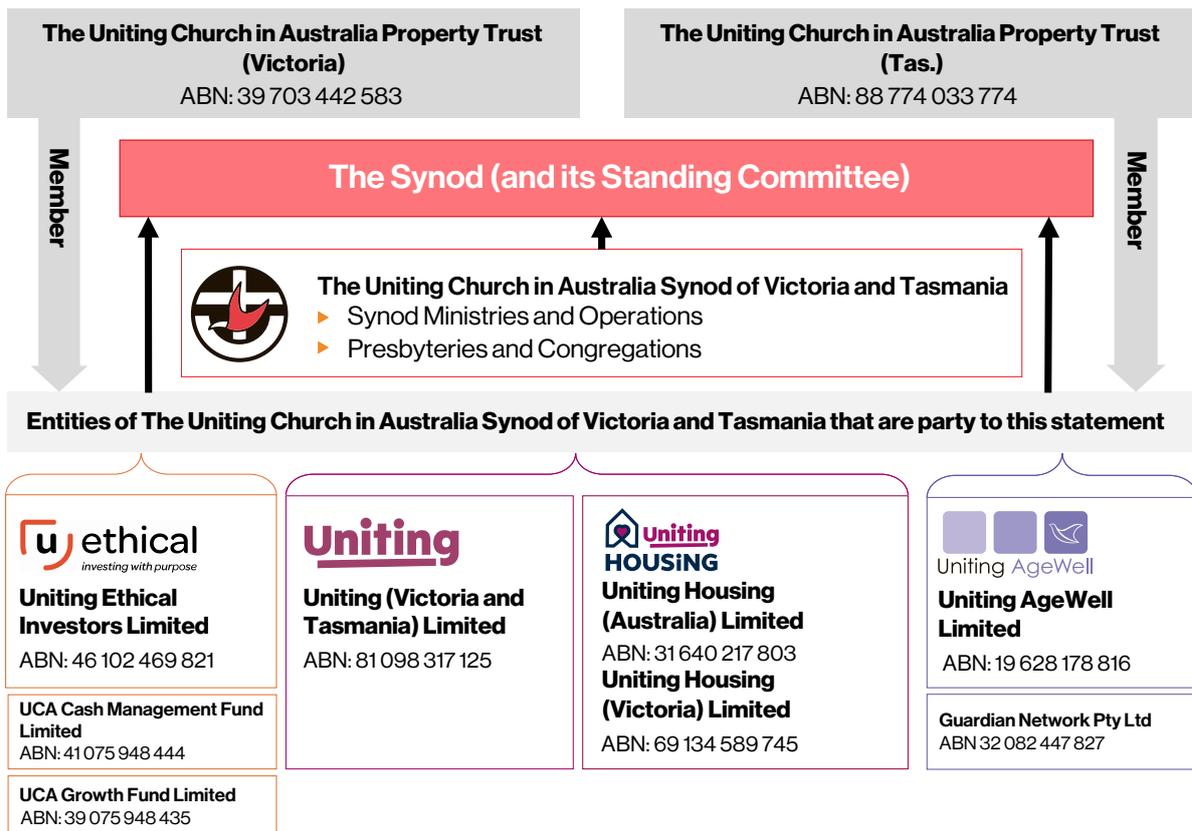
Through our historic and ongoing community work, we and our predecessors established and maintained several entities to act as an extension of the Church, including:

- ▶ Uniting (Victoria and Tasmania) Limited;
- ▶ Uniting AgeWell Limited; and
- ▶ 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 UCAPT Victoria and UCAPT Tasmania 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 UCAPT Victoria and UCAPT Tasmania, 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; and
- (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; and
- ▶ 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 on-going relationship with the Synod through one of its entities.



A survey of our congregations revealed low spending on products that are higher risk of modern slavery in their production. The collective spend of the approximately 200 congregations that filled out the survey on high risk products was:

- ▶ Tea and coffee - \$16,900;
- ▶ Fresh fruit and vegetables - \$18,900;
- ▶ Disposal gloves - \$3,200; and
- ▶ Clothing - \$4,300.

These purchases would be made up of small purchases across many suppliers. Thus, none of the expenditure by congregations would allow for meaningful engagement with suppliers that is likely to lead to change given the small amounts involved.

## 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. As no one from the company responded, we e-mailed again on 19 May 2022.

At the time of writing, we had not heard back from Bidfood. A review of the 2021 Bidfood Modern Slavery Statement (Bidfood Statement) includes information about many positive steps that Bidfood is taking. However, the Bidfood Statement is largely high level and contains no specific information to verify how the stated measures have been implemented and applied. For example, on page 6 of the Bidfood Statement it is noted that Bidfood conducts in-depth investigations if a supplier fails to meet their standards. However, there is no information about how many in-depth investigations have been conducted, if any. There is also no detail about what would be involved in such an investigation, as we are aware there are many actions that could be undertaken. The Bidfood Statement also mentions on page 9 that Bidfood has switched manufacturers and raw material usage to lower risk profiles, which is a very valid action to reduce modern slavery risks. Again, no details are provided about how often this has happened and in relation to which goods. The lack of detail in the Bidfood Statement and their unwillingness to discuss their actions with us, leaves the Synod unable to effectively assess the modern slavery risks that persist in Bidfood's business.

On 25 May 2022, we contacted PFD as a food service supplier to our campsites. We requested to know the top five suppliers of tinned fruit or vegetables or dried fruit where it is coming from Australian farms to our campsites. We followed up with a second e-mail on 3 July 2022. They provided us with a list of the top ten suppliers they sourced product from in the categories requested for our campsites. We plan to follow up with a number of these suppliers.

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. They agreed to provide a list of their suppliers to us, which was provided. We also sent them suggested questions they could use in discussion with their suppliers to identify suppliers with a higher risk of modern slavery or illegal worker exploitation.



We telephoned Freshcut, who supply fresh fruit and vegetables to aged care facilities in Tasmania, and followed up with an e-mail on 9 February 2022 to ask what steps they were taking to address the risk of modern slavery in their supply chains. They replied on 10 February 2022 to indicate they take no steps to identify or address risks of modern slavery in their supply chains.

Across all of the entities that make up the Synod, spending with Coles and Woolworths exceeds \$800,000 for each entity. It has not been possible to establish the qualities of specific goods that have been purchased across the organization, but we have assumed that some of that spending has been on horticulture products. On 14 June 2022, the Moderator of the Synod wrote to the CEO of Woolworths requesting that to minimize the risk of modern slavery in their horticulture products Woolworths give preference to producers that use workers on the Pacific Australia Labour Mobility (PALM) scheme.

Employers on the PALM scheme are subject to a much higher level of scrutiny in their treatment of workers compared to other employers in the horticulture sector. The letter also requested that Woolworths share its horticulture supplier list with the United Workers Union (UWU), to identify any risky suppliers the UWU is aware of. The UWU has a high level of presence on the ground in the horticulture sector, forming a unique source of intelligence about more risky employers in the sector. At the time of writing, there was no reply from Woolworths.

The Moderator of the Synod wrote to the CEO of Coles on 13 July 2022, making the same request as had been made to Woolworths. Coles replied on 26 July 2022, offering a meeting. A meeting was initially arranged for September 2022, however this did not take place and Coles have not responded to arrange an alternate time.

## 2.3 Disposable glove production

As outlined in our first and second Modern Slavery Statements, we were concerned about the strong evidence of modern slavery of workers from Nepal, Myanmar, Indonesia and Bangladesh in disposable glove factories in Malaysia.

The Synod met with its supplier, WINC, and it was agreed all disposable gloves would be sourced from a single supplier. That supplier agreed it would reveal which factories the gloves were being sourced from. We wrote to WINC on 21 August 2022 to request that the list of factories supplying us with gloves.

## 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 <https://victas.uca.org.au/news-events/uca-statements/>.

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.

A significant part of the risk of modern slavery in electronic hardware relates to any hardware produced in China. See section 2.6 in relation to our current approach to goods produced in China.



## 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>4</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. In February 2022 we issued a resource sheet to our congregations advising them on how to reduce the risk of modern slavery in any solar system purchase they make.

Data collected from our congregations indicated that 34 had solar panels installed, but only one rooftop solar system had been installed in the last year.

## 2.6 China

The Synod is aware of the strong evidence of the use of forced labour in China under the approval of the Chinese Government. While the risk of forced labour is particularly high in relation to the Uyghur ethnic group, it also extends to forced labour involving work experience students more generally.

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>5</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>6</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>7</sup>

Media reports indicated the presence of forced labour in cotton production in the Xinjiang region of China.<sup>8</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>9</sup>

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>10</sup>

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4 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.

5 Danielle Cave, James Leibold, Kesley Munro and Nathan Ruser, *Uyghurs for Sale*, (Australian Strategic Policy Institute, Report No. 26, 2020).

6 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.

7 Ibid., 2.

8 Sam Meadows, "Top labels urged to ban Xinjiang cotton", *The Age*, December, 17, 2020.

9 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.

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



Subsequently, the Fair Labor Association banned its member businesses from sourcing, directly or indirectly, products from Xinjiang.<sup>11</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>12</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>13</sup> He stated that 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.

The Synod has currently concluded it is near impossible to address risks of modern slavery in the production of goods out of China, due to the endorsement and facilitation of forced labour by the Chinese regime. The involvement of the regime makes it impossible to conduct effective on-the-ground investigations to determine if forced labour is present in the production of certain goods. Responses from Chinese suppliers cannot be relied upon as evidence that forced labour is not present in the production of goods. The absence of independent trade unions also hinders any independent verification that modern slavery is not present in the production of the goods in question.

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>14</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. No reply was ever received. U Ethical decided to divest of the stock in May 2022, mainly due to exposure in Russia in the context of the Russian invasion of Ukraine.



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

12 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.

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

14 End Uyghur Forced Labour, 'Statement: Coalition position regarding Inditex and the Uyghur forced labour crisis', 26 April 2021, <https://enduyghurforcedlabour.org/news/statement-coalition-position-regarding-inditex-and-the-uyghur-forced-labour-crisis/>



## 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 modern slavery risk assessment process focuses on reviewing our supply chain through spend analysis and categorisation, desktop research of suppliers, and supplier engagement in key risk areas. Due to limited detailed supplier data, we are not able to undertake a detailed geographic risk assessment of our suppliers, however the vast majority of our tier-one suppliers are local. This work was completed in partnership with our JIM Cluster, who coordinate 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
<b>Property maintenance and development</b>	<p>We undertake a range of property development, improvement and maintenance activities across Victoria and Tasmania. 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>



<b>Information technology (IT) hardware</b>	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.
<b>Food services</b>	<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>
<b>Cleaning services</b>	<p>The Synod office is located at Wesley Place in Melbourne which is operated by Charter Hall, who 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 (CAF). While 130 Lonsdale is not one of those buildings certified under the CAF, Charter Hall advised in 2021 they were considering a robust and scalable model to address modern slavery risks across all their properties. As at August 2022, Charter Hall advised they had recertified the sites they already had as part of the CAF, however were yet to make a call on how to progress more broadly.</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.

<b>Spend category</b>	<b>Comments</b>
<b>Property maintenance and development</b>	<p>Presbyteries and congregations undertake a range of property maintenance activities to ensure Church buildings remain safe and fit for purpose. 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>Any property maintenance and development projects with material spend are overseen and coordinated by the SMO's Property Services Team. This spend is therefore subject to SMO procurement practices.</p>



### Information technology (IT) hardware

With some congregations strengthening their online presence and increasing the use of technology solutions to support operations, there has been a shift towards the online environment, increasing the need for IT hardware. A significant portion of IT hardware used by presbyteries and congregations is procured via SMO's IT Team.

This continues to be an area of active investigation coordinated by our JIM Cluster, as reported in section 2.4 of this statement.

### Food services

- Fresh fruit and vegetables
- Tea and coffee
- Chocolate

Many of our congregations procure food, tea and coffee 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.

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.

### Disposable gloves

Congregations did have some spend related to disposable gloves, though this is not considered material. These purchases would be via local shops such as pharmacists and supermarkets with limited 'buying power' or ability for local stakeholders to assess related risk.

## 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. As part of prior commitments to improve modern slavery risk management, we have updated our procurement policy to ensure that modern slavery, and ethical sourcing more generally, is a key consideration throughout the procurement process. Building on this work, and to ensure the policy and process are applied in practice, we have since provided training and education to all staff on expected procurement practice, including ethical sourcing.

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 captures 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

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.

As planned, we have embedded consideration of modern slavery and ethical sourcing throughout the procurement process and have provided training and education to all staff to ensure this is applied in practice.

In recognition of the Synod's limited ability to direct and oversee the procurement activities of presbyteries and congregations, we continue to share resources 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:

- Continue to investigate high-risk categories of spend; and
- 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 3,300 employees and 2,000 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.

The Housing and Property division is commencing work on the implementation of an asset management system which will allow for closer monitoring of contractors and their compliance with the modern slavery act.

### **4.2.3 General**

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In the current reporting period, Uniting have re-profiled our supplier register to identify high-risk suppliers and provided the Synod's JIM Cluster with this profiling data.

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 Microsoft Dynamics, a well-recognised leading global ERP solution, to manage its vendor masterfile. We have requested that Microsoft Dynamics support us in making enhancements to the vendor directory to include certain social procurement characteristics including Modern Slavery risks and compliance with the Act.

### **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 requested that our ERP software provider (which houses our Vendor Masterfile) make enhancements to the vendor directory to include certain social procurement characteristics including Modern Slavery risks.
- We are working closely with the Synod's JIM Cluster to identify high-risk suppliers and support inquiries.
- Commercial documentation continues to be improved with greater emphasis on modern slavery.
- 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 and responsible investment manager with approximately 25 employees, primarily office-based and located in Melbourne, Australia. Our core business is issuing and managing investment products.

Our investment process applies strict ethical screens. We seek to invest in companies that promote human welfare and dignity and environmental sustainability, with high or above average 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 funds a community contribution made via the Uniting Church in Australia, Synod of Victoria and Tasmania. The Synod uses these funds to facilitate 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

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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 (U Ethical has 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 qualitative assessments of all companies considered for portfolio inclusion, we integrate 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. These identified key risks related to modern slavery within the consumer discretionary, consumer staples, healthcare, industrials, information technology and real estate sectors. Fixed income portfolios 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 responsibility, which contribute to both corporate and policy action on modern slavery issues.

In addition to the direct overview and analysis of our portfolio exposures, U Ethical collaborates with industry peers 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**

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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 2022. 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;
- ▶ Engaging with our suppliers with whom we spend more than \$50,000 by requesting the completion of our in depth questionnaire;
- ▶ By providing supporting documentation.



### **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. Seven of these tier-one suppliers have offices in multiple locations, with head offices in either the UK or USA, and the remaining suppliers are based in Australia.

### **PRODUCT AND SERVICE TYPES**

U Ethical's top ten suppliers provide products/service types in relation to accounting/payroll; IT services; custody; unit registry; 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), finance services (payroll), people and culture services and IT services. We acknowledge the Synod's efforts in ensuring it has appropriate processes and procedures to assess and minimise modern slavery risks within its operations.

U Ethical's remaining 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 identifying 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. 100% 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. All firms have provided appropriate information in relation to employment and codes of conduct either via their modern slavery statements or by confirmation as part of their response to the questionnaire, and in some instances by providing relevant policies.

### **RISK ASSESSMENT RESULT**

After considering each of the above elements all top 10 suppliers have been identified as having low modern slavery risk rating.

## **5.2.3 Investments and operations**

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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 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 rights screen spans controversy cases, an overview of business segments and regional exposure (low-medium-high) and a diversity of factors that cover, among others, labour management practice health and safety, controversial sourcing, corruption and instability. This analysis only touches on tier-1 supply chain risk exposures. In order to deepen our due diligence, in early 2021 we joined Investors Against Slavery and Trafficking (IAST) to advance engagement discussions with portfolio companies. IAST released its first report in July 2022.<sup>15</sup> Further details on our engagement activities, including the collaboration with IAST, can also be found in U Ethical's 2021 Stewardship Report.<sup>16</sup>

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 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 the actions expected to be taken, as well as looking to set up a meeting to discuss those concerns whether in-person, or 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 the 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, support for shareholder resolutions or continued advocacy; or
- ▶ As existing shareholders, 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, and unit registry;
- ▶ 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.

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<sup>15</sup> <https://www.iastapac.org/about>

<sup>16</sup> <https://www.uethical.com/uploads/resources/U-Ethical-Stewardship-Report-20220617-APPROVED.pdf>



The size and nature of our business as a regulated financial services company means we employ targeted strategies and formal controls when outsourcing 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 of 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. We are a participant of Investors Against Slavery and Trafficking (IAST) and also a certified B Corporation. 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 issues, 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, support for 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 the degree of causation or linkage to 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 is not for profit with a long and extensive history of providing residential and community services to older Australians across Victoria and Tasmania.

Uniting AgeWell is a Public Benevolent Institution regulated by the Australian Charities and Not for Profits Commission. The company is an Approved Provider of aged care services under the Aged Care Act 1997.

Uniting AgeWell service options include:

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

Uniting AgeWell also wholly owns a subsidiary company, Guardian Network Pty Ltd, which 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 3,100 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, Clinical Governance and Governance.

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; and
- ▶ **Risk management and due diligence** – In 2022-23, 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.
- We promote awareness and active assessment of modern slavery risks to all staff who are involved in procurement activities.
- We ensure supplier contracts include appropriate clauses relating to anti-slavery laws.
- We continue to investigate high-risk categories of spend.
- We continuously engage with suppliers to identify and mitigate modern slavery risks.
- The Uniting Care 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; and
- Develop key performance indicators to measure effectiveness in preventing modern slavery in any part of our business or supply chains.