

**FY21**

Modern Slavery  
Statement

# Acknowledgement of Country

We acknowledge Aboriginal and Torres Strait Islander peoples in South Australia as the original and ongoing custodians of the lands and waters on which we all live and work. We recognise their continuing sovereignty and right to self determination. We pay our respects to all Elders – past, present and future – and to all Aboriginal and Torres Strait Islander peoples and communities.

## Modern Slavery Statement 2020/21

### Key achievements

			
<b>Partnership</b>	<b>Due diligence</b>	<b>Responsibility</b>	<b>Collaboration</b>
Partnering with a third party to operate and maintain a customised online digital platform to track supplier progress	Conducting preliminary due diligence by screening our direct suppliers for risk areas including modern slavery	Establishing a procurement role to manage the engagement of suppliers	Collaborating with and supporting our suppliers to share information about their operations and supply chains

This Modern Slavery Statement (Statement) is made in accordance with the *Australian Modern Slavery Act 2018 (Cth)* (The Act). It describes the steps taken by UnitingSA Ltd and its subsidiaries during the financial year ending 30 June 2021 to mitigate modern slavery risks in all areas of our business. This Statement is submitted by UnitingSA Ltd on behalf of the UnitingSA group, which includes UnitingSA Housing and Wesley Social Enterprises.

As a leading South Australian not-for-profit community services provider, UnitingSA is absolutely committed to ensuring modern slavery does not occur anywhere in our operations or supply chains. We respect the human rights of our employees, volunteers, clients, residents, suppliers and business partners, and we commit to identifying and managing any risks to these rights.

Our commitment to joining the fight against modern slavery goes well beyond meeting a legal responsibility. It speaks to a deeply-held ambition to make the world a better place for all people. It is fundamental to our vision for a compassionate, respectful and just community in which all people participate and flourish.

I am grateful to the teams at UnitingSA who have worked so hard to develop and implement this action plan and I am encouraged by our future endeavours. We are committed to building upon the foundations already laid, identifying future risks in our supply chains and developing effective processes that contribute to eradicating modern slavery. Together, we can bring an end to modern slavery and create positive change for the most vulnerable and disadvantaged members of our global community.

**This Statement was approved by the Board of UnitingSA Ltd on [date].**



**Gael Fraser**  
UnitingSA Board Chair





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# Introduction

**At UnitingSA, we turn our values into actions. Every aspect of what we do is unified by determination, a respect for everyone's unique worth and a passion for empowering people.**

Since our founding in 1919, we have stood firmly alongside vulnerable members of our community and faced the world as one.

We have sought opportunities to enliven communities, enrich lives and improve wellbeing, and have prioritised support for those who are more vulnerable to human rights violations.

In our advocacy and service delivery, we have demonstrated a strong and enduring commitment to upholding human rights standards.

UnitingSA recognises that modern slavery is a fundamental breach of human rights and we are committed to joining the fight to end modern slavery in all its forms.

We are acutely aware of the importance of addressing the risk of modern slavery in all areas of our business, including our operations and supply chains.

This Statement reflects UnitingSA's commitment to acting with respect, compassion, courage and integrity, and outlines our first steps in doing our part to eradicate modern slavery.

We acknowledge there is still much we can and must do, and we remain focused on the continued implementation and enforcement of effective systems and controls to ensure modern slavery risks in our business are mitigated.

## Our approach

This Statement is submitted by UnitingSA on behalf of the UnitingSA group, pursuant to section 14 of The Act.

It describes the steps taken by UnitingSA and our subsidiaries during the financial year ending 30 June 2021 to mitigate modern slavery in our operations and supply chains.

It is the first Modern Slavery Statement submitted by UnitingSA.

## Our focus areas

Our organisation is proud of what we have achieved in our first reporting period to assess and address risks of modern slavery in our organisation.

We have implemented new processes and procedures, conducted due diligence on suppliers and commenced mapping our supply chains.

We also partnered with a third party to develop a digital solution that will allow us to track our suppliers on an ongoing basis.

**Below is a summary of key actions undertaken in 2020/21:**

- **Implementation of compliance framework**
  - » Appointment of modern slavery leader
  - » Partnership with a third party
  - » Implementation of a digital supplier platform
- **Policies and procedures**
  - » Development and rollout of a Supplier Code of Conduct
  - » Drafting of a modern slavery policy
  - » Creation of a modern slavery contract clause template
- **Supplier due diligence**
  - » Independent screening of suppliers
  - » Risk matrixing
  - » Development of a questionnaire and communication to suppliers
- **Remediation steps**
  - » Further communication



# UNITINGSA

**1919**

Founded in 1919 to respond to the needs of the Port Adelaide community amid a devastating influenza outbreak and the aftermath of the First World War

**Headquartered  
in Port Adelaide,  
South Australia**

More than 1,000 staff and volunteers

**1,062**



Diverse organisation with services across aged care, housing, mental health, disability, employment, community welfare, family, youth and children



**>95%** of our tier one suppliers operate **only in Australia**

**>75%** of our direct suppliers head operations in **South Australia**

**12,517**

One of South Australia's largest community service organisations, supporting over 12,000 people each year

## About us

### Our organisation started from humble beginnings in 1919, when the Methodist Church formed the Port Adelaide Central Methodist Mission.

The 'Port Mission' sought to respond to the material and spiritual needs of the Port Adelaide community amid a devastating worldwide influenza outbreak and the aftermath of the First World War.

Soaring unemployment, chronic illness and poverty plagued the Port and within just a few years the Mission was supporting 80 local families with material aid such as food, clothing and firewood, as well as a range of other practical support, such as linking families with government rations and counselling those in need of solace.

As demand grew, so too did our organisation and in 2003 the Mission became UnitingCare Wesley Port Adelaide. Expansion continued in the following years with people accessing our services from across South Australia. In 2017, this led us to change our name to UnitingSA.

### Our structure

UnitingSA is a not-for-profit organisation registered with the Australian Charities and Not-for-profits Commission.

UnitingSA is a solely South Australian based public Company Limited by Guarantee with a head office at 70 Dale Street, Port Adelaide.

Three entities operate under the UnitingSA Board of Directors and are wholly-owned and controlled by the Board and UnitingSA's Executive Team.

The three entities that are governed by the UnitingSA Board and controlled by the Executive Team are:

- UnitingSA Ltd, ABN 29 335 570 988;
- UnitingSA Housing Ltd (UnitingSA Housing), ABN 57 229 788 559; and,
- Wesley Social Enterprises Incorporated (WSE), ABN 43 261 657 790.

For structural purposes, UnitingSA Housing and WSE can be considered subsidiary organisations of UnitingSA Ltd.

These entities are all based in South Australia, with the focus of UnitingSA Housing to build and provide housing to people on low to moderate incomes and WSE to provide supported employment for people living with disability or mental health challenges.

### Our operations

UnitingSA has a long and proud history of building stronger communities and supporting South Australians in need.

Established on 8 April 1919, today we deliver services to individuals and communities from more than 30 locations across regional and metropolitan South Australia.

Each year, our team of over 1,000 staff and volunteers touches the lives of more than 12,000 people through the delivery of diverse programs across aged care, housing and community services.



## Our operations *(Cont.)*

### UnitingSA's impact in 2020/21:

- 2,077 people received **Aged Care** services
- 767 people accessed affordable rental accommodation through **UnitingSA Housing**
- 5,913 people were supported by our **Child, Youth and Family** programs
- 1,575 people accessed support through our **Homelessness** services
- 552 people had their health and wellbeing supported through our **Mental Health** services
- 410 people received support under the **National Disability Insurance Scheme**
- 1,483 people were assisted through our **Employment and Training** programs
- 1,034 people sought help for money matters with our **Emergency Relief** financial counsellors
- 499 young people engaged with our **Urban Youth** and **Flexible Learning Options** programs
- 93 people were provided supported employment at **Wesley Social Enterprises**

### Aged care

We provide lifestyle, health and care services to more than 2,000 older South Australians through our residential aged care sites, retirement living communities and home care services.

We're also proud to deliver Ethnic Link Services - a statewide federally funded program for older people from diverse cultures.

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

## Community services

UnitingSA's community services provide tailored support to meet the unique life experiences and needs of South Australians facing a range of challenges.

We offer programs for children, young people, parents and Aboriginal and Torres Strait Islander peoples.

We support families and individuals to manage household and financial difficulties, and walk alongside people on their journey out of homelessness.

We assist people to engage with education and training, and help them along their employment pathway.

We also offer support to those living with mental health challenges, and help people living with disability to build and maintain their independence.

Our Community Services are primarily offered across Adelaide's north, west and south, with our Mental Health programs also occupying a strong presence in the state's regional areas.

### UnitingSA Housing

Since 1984, UnitingSA Housing (formerly Portway Housing Association) has been providing affordable rental options for those who need it most.

In 2020/21, more than 700 people were provided affordable accommodation in 404 UnitingSA Housing properties. While we provide housing across a number of areas in metropolitan Adelaide, most of our housing options are located in the northern and western suburbs.

### Wesley Social Enterprises (WSE)

WSE is an NDIS service provider offering meaningful supported employment to people with a disability in both metropolitan and regional South Australia.

Almost 100 supported employees are part of a team of dedicated people delivering a range of products and services to individuals, businesses and government departments.

# Our supply chains

## Our diverse operations within aged care, housing and community services result in intricate supply chains across many industries.

Our organisation is focused on supporting local businesses. As a result, all of our direct suppliers are located in Australia, with over 75 per cent heading operations in South Australia.

In order to conduct an overall risk analysis of our suppliers, it was important to categorise our suppliers based on the industries they operate within.

Scoping and characterising our direct suppliers were the first steps we took to map our supply chains.

### Our key areas of spend and engagement include:

- **Labour services**  
Day-to-day work undertaken at any of our sites, such as plumbing, maintenance, gardening and electrical work. It also includes services by nursing and allied health professionals.
- **Medical supplies**  
Ranging from defibrillators to monitoring machines.
- **Administration**  
Such as stationery, printing and other administrative requirements.
- **Consumables (food)**  
Food and produce purchased directly from wholesalers and retailers, such as coffee beans, fruit and vegetables. It also includes catering services engaged for events.
- **Apparel and laundry**  
Linen and uniforms.
- **Facility supplies**  
Everyday equipment and tools which are used to effectively operate our sites.
- **Electronics**  
Computers and other electronic systems (including software), which are used in our head office and across our sites.
- **Professional services**  
Includes advice provided by service providers such as lawyers, accountants and insurers. UnitingSA also engages assistance from independent consultants to maintain and improve efficiency across our operations.



## Supplier locations

All of our immediate tier one suppliers are located in Australia. We are proudly South Australian and the overwhelming majority of our direct long and short-term suppliers are engaged in SA.

We have built relationships with many of our suppliers over years and typically have long-term relationships with our biggest suppliers.

The suppliers that are new are generally those which provide short-term solutions, including maintenance and customer services, such as gardeners and hairdressers.

We are taking proactive steps to review the length of our supplier relationships.

Figure 1 below sets out how our supplier base is distributed across the states and territories depending on the industry.

As expected, the majority of our suppliers relating to food (consumables) and labour services are based in South Australia.

While South Australia remains the place where we engage the majority of our suppliers across other industries, the location of suppliers that provide electronics and administrative services is more spread towards the eastern states.

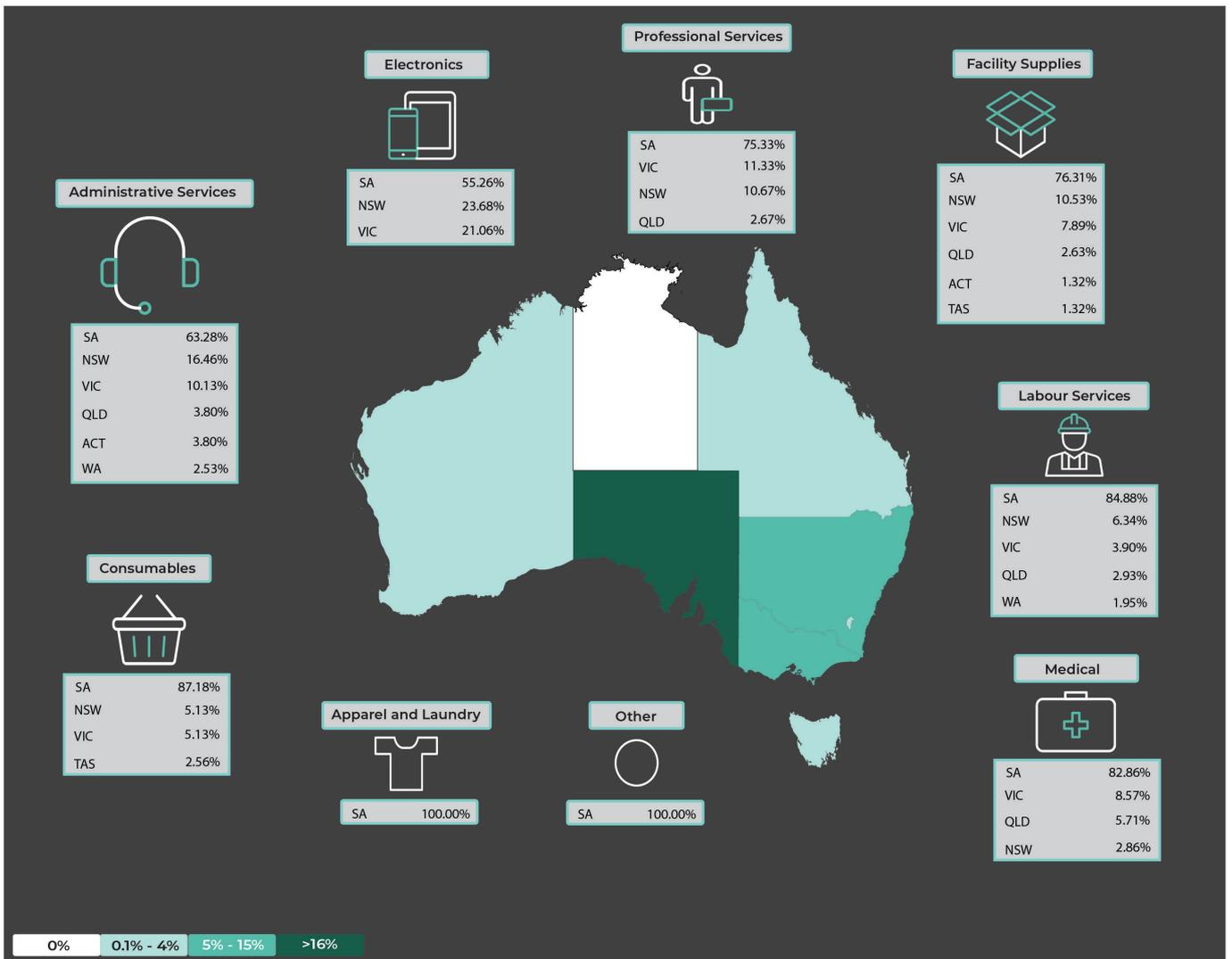


Figure 1. Supplier locations across Australia

## Raw Materials

Through communication with our supplier base, we have commenced gathering information about where raw materials are being sourced for the goods and services that are ultimately being provided to UnitingSA.

Through this process, we are able to begin mapping where raw materials for some of our products were sourced.

Figure 2 indicates where the raw materials in products were sourced (if applicable to the supplier).

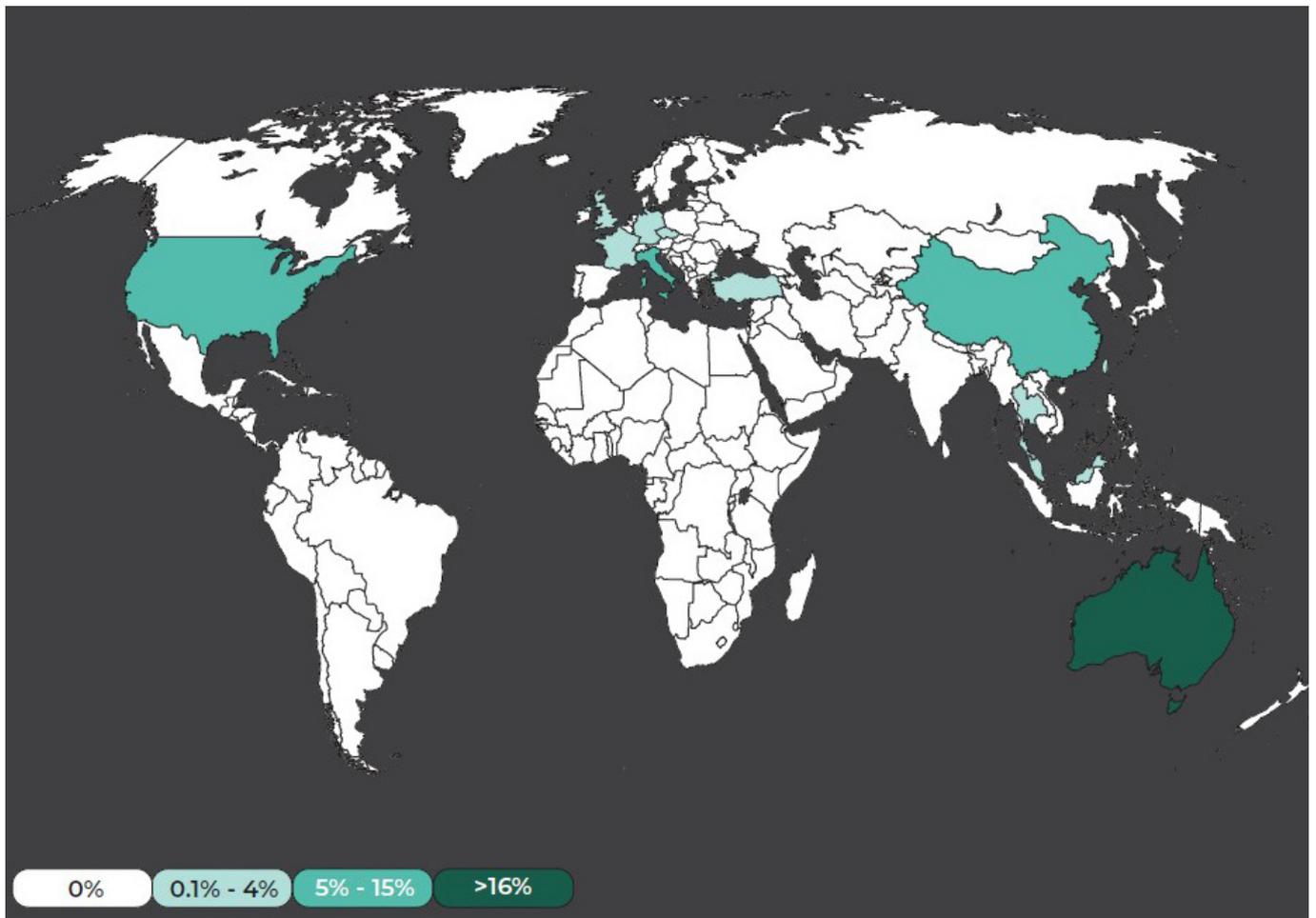


Figure 2. Source countries of raw material

# Modern slavery risks

## This section describes potential modern slavery risk areas in our operations and supply chains.

UnitingSA understands that the 'risks of modern slavery practices' means the potential for us to cause, contribute to, or be directly linked to modern slavery through our operations and supply chains.

We also understand that risks of modern slavery are multifaceted and indicators such as vulnerable populations, and certain goods, services and locations can all contribute to risk profiles.

UnitingSA has used publicly available information and resources, such as the *Global Slavery Index* and the *Trafficking In Persons Report 2021*, to help identify the industries and locations that present the highest risks of modern slavery.

More than 95 per cent of our tier one suppliers operate only in Australia. This lessens the risks of modern slavery as compared to other jurisdictions.

In addition, our operations and industry profile mean that statistically, the risks of modern slavery are less prevalent.

Notwithstanding this, we are aware that modern slavery is present in Australia and due diligence must be undertaken on our Australian suppliers and in our operations to assess any risk.

UnitingSA is serious about combatting any risks of modern slavery and acknowledges that these risks are likely to present further down our supply chains.

Despite this being our first reporting period, our efforts to map our supply chain have illustrated that even when using almost exclusively Australian suppliers, the materials and labour involved in our supply chains have global origins.

On this basis, we have carefully considered any risks of modern slavery at each level and how we may cause, contribute to, or be directly linked to modern slavery practices.

### • Causing modern slavery

The likelihood of our operations causing modern slavery is low. Our operations are located entirely within South Australia and primarily involve providing services for residents at our aged care facilities, as well as a range of other caring and advisory services at other metropolitan and regional locations across the state.

Our workers also operate in a highly regulated industry. On this basis, we are confident that through training, as well as policies and procedures in place, the risks of UnitingSA causing modern slavery in our operations are low.

### • Contributing to modern slavery

UnitingSA understands we must consider whether our practices may contribute to modern slavery. While we acknowledge that the risks associated with the industry we operate within are typically low, we have a wide range of personnel in our organisation who directly engage with small suppliers for immediate needs and consequently we feel this is an area that our business can address to further mitigate our risks of contributing to modern slavery.

UnitingSA is embarking on a thorough review of our procurement practices. The first step is to gain an understanding of the services that are procured across our sites. We already maintain a list of preferred and alternate suppliers, however we are working to further enhance our procurement practices to reduce the likelihood of us imposing urgent or unrealistic timeframes on our suppliers wherever possible.

### • Being directly linked to modern slavery

UnitingSA recognises that this category is where any potential modern slavery risks are likely to present in third parties that are connected to our organisation. We recognise that risks of modern slavery may present deeper in our supply chains.

Within Australia, the most immediate modern slavery risks to us are more likely to present in the agriculture, hospitality and cleaning industries. Reporting and publicly available information suggest that modern slavery risks are amplified where migrant workers are undocumented, increasing the likelihood of exploitation. On this basis, we have prepared an analysis of our key risk areas (*Table 1*, page 10).

Key categories of goods and services	Potential modern slavery risks
<b>Cleaning services</b>	The cleaning industry is exposed to high modern slavery risks due to the use of unskilled labour often leading to migrant recruitment, poor working conditions, debt bondage and other slavery practices. The industry frequently uses complex subcontracting arrangements which hinder oversight mechanisms.
<b>Provision of and cleaning of linen</b>	The linen industry is subject to risks of modern slavery due to frequent use of migrant labour and risks within the supply of raw materials. The industry often involves complex supply chains with restricted oversight and increased opportunities for modern slavery practices.
<b>Produce and food</b>	The food industry frequently uses immigrant workers for unskilled labour, the importation of competitively priced high-risk goods, and poor working conditions. Reports also suggest that the number of instances of labour exploitation within the agriculture industry has increased over recent years.

**Table 1.** Risk analysis of key risk areas

UnitingSA has also identified additional industries that may present some risks of modern slavery practices. We recognise that these risks are likely to present further down our supply chains.

Despite this presenting a significant challenge, we are committed to improving our visibility over supply chains to identify where these risks present.

The risks outlined in *Table 2* are mainly associated with the sourcing of raw materials and initial manufacturing stages, which often are processes that take place overseas.

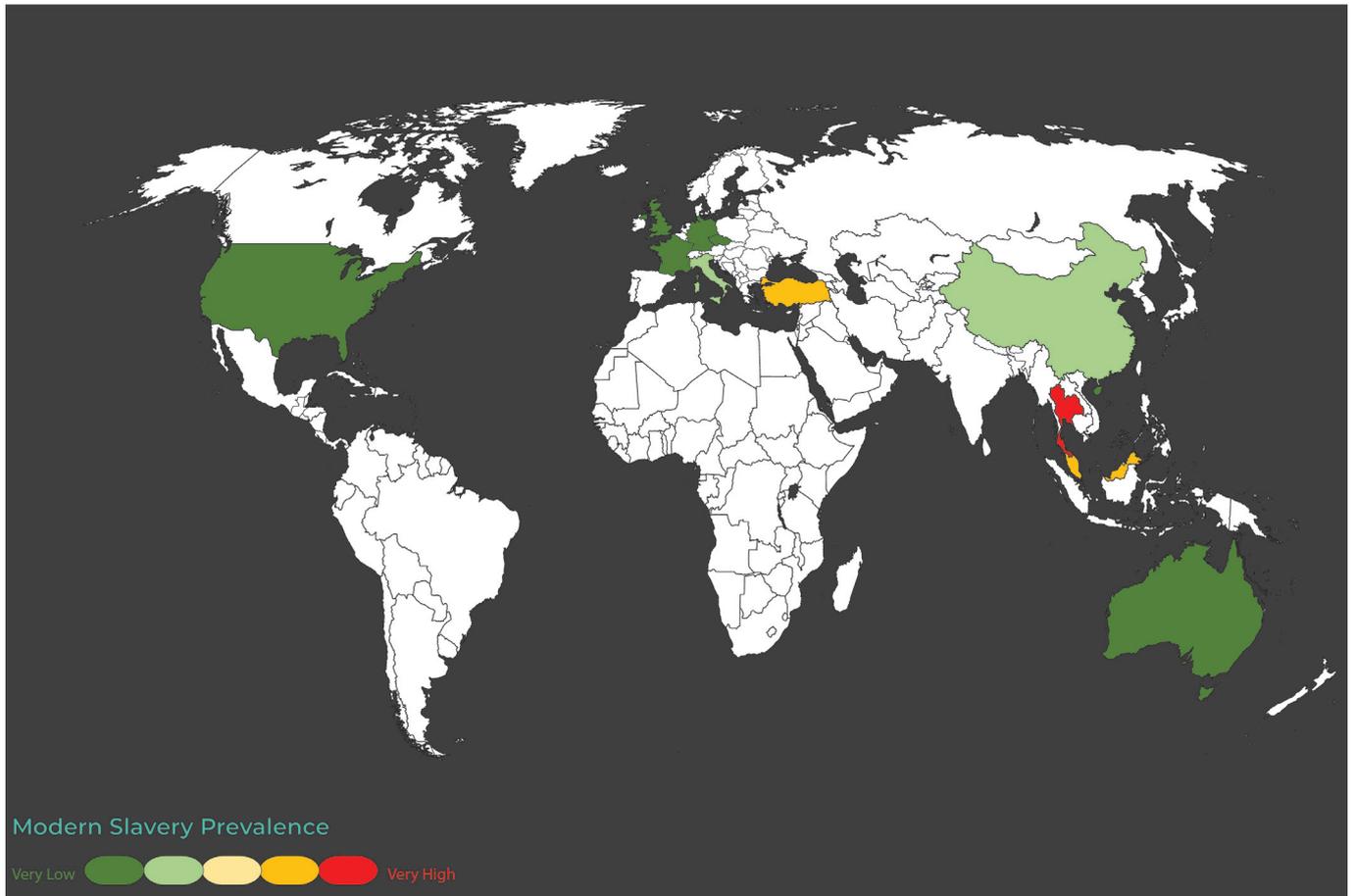
Key categories of goods and services	Potential modern slavery risks
<b>Construction and maintenance services</b>	The construction and maintenance industry is subject to modern slavery risks due to frequent use of migrant labour, dangerous working conditions, and the raw materials involved. It is estimated that around 18 per cent of modern slavery victims are found in the construction industry. In Australia, some construction sites have been found to be exploiting immigrant workers by subjecting them to debt bondage, poor conditions, and temporary work. The materials required in construction also serve modern slavery risks, as over 22 per cent of forced labour victims are found within the manufacture and production of materials commonly used in construction. <sup>2</sup>
<b>Electronic goods</b>	The electronics industry is subject to modern slavery risks due to its high demand, complex supply chains, and use of high-risk raw materials. A significant number of workers in electronics manufacturing are vulnerable migrant workers who are subject to forced labour, debt bondage and other slavery practices. In some cases, raw materials used in electronics production are sourced in some countries via forced labour.
<b>Personal protective equipment (masks, medical gowns etc.)</b>	The production and disbursement of personal protective equipment (PPE) is subject to modern slavery risks due to importation from high-risk locations and increased demand throughout the COVID-19 pandemic. During the initial surge of PPE demand in 2020, the majority of Australian supplies came from countries where frequent instances of poor working conditions, forced labour and excessive hours were reported.

**Table 2.** Potential modern slavery risks within our supply chains

<sup>2</sup> As indicated by research from the Australian Human Rights Commission.

Based on known source locations of raw materials for parts of our supply chains, we also performed an in-country analysis based on the modern slavery prevalence of each country.

Using data from the *Global Slavery Index*, we were able to conduct a risk rating for each country that is involved in the production of raw materials in our supply chains (*Figure 3*).



**Figure 3.** Risk rating of countries of source locations of raw materials

Note: The prevalence of modern slavery is based on the data provided by the Walkfree Modern Slavery Index.



# Actions to address the risks

## Implementation of compliance framework

### Appointment of modern slavery leader

UnitingSA appointed a modern slavery leader to ensure accountability and responsibility over our modern slavery compliance program.

### Partnering with a third party

UnitingSA decided to collaborate with professionals who had experience in developing a modern slavery compliance framework. On this basis, we engaged a third party to assist in the set up and ongoing management of our modern slavery compliance framework, and to provide us with guidance and oversight.

### Digital platform

As part of our commitment to mitigating modern slavery risks in our operations and supply chains, UnitingSA engaged the expertise of a third party to collaborate and develop a digital platform that allows us to track and manage our relationships with suppliers, and build a database of information about our suppliers.

In the short period since its launch, the platform has already yielded significant benefits. A hallmark feature is the workflow, which allows us to upload a supplier in Stage 1 and track the supplier as we conduct multiple stages of due diligence (explained below).

At each step in the process, we can commence remediation based on risks that are uncovered in our due diligence process. The flexibility and automation that this online solution offers means we have accurate and up-to-date data across our supplier base. This allows UnitingSA to be more proactive in our assessment of suppliers, and the variety of data reports can assist us to prioritise our identified modern slavery risk areas.

As part of implementing a broader overall compliance framework, we facilitated a consultation process with various staff members and a third party agency to draft and implement a Supplier Code of Conduct (the Code). The Code covers our expectations of our suppliers and their supply chains, addressing labour and human rights, health and safety, environment, diversity and business integrity.

Importantly, the Code also provides information on how a supplier or anyone else captured by the Code can ask questions or report behaviour directly to the designated person within UnitingSA. The Code makes reference to our already established Whistleblower Policy and encourages reporting, in line with our goal as an organisation to promote transparency and encourage employees and suppliers to be open with UnitingSA.

### Modern Slavery Policy

Another key policy that UnitingSA began developing in this reporting period was a Modern Slavery Policy. The Modern Slavery Policy addresses UnitingSA's commitment to preventing any instances of human rights violations or modern slavery within our organisation or supply chains.

The Modern Slavery Policy captures all of those involved in dealings with UnitingSA and encourages openness. It is designed to educate and inform our employees, agents, suppliers and contractors about modern slavery. The Modern Slavery Policy will be implemented in the next reporting period. As a reporting entity, UnitingSA feels that we have the opportunity to educate our suppliers in a way that we envisage will result in education flowing down our supply chains.

### Template modern slavery contract clause

With assistance from a third party, UnitingSA developed a modern slavery contract clause that can be inserted into our terms and conditions and contractual arrangements with suppliers.

This clause empowers suppliers to report suspected or actual modern slavery instances to UnitingSA. In addition, this clause is designed to ensure all suppliers are aware of UnitingSA's commitment to mitigating modern slavery risks, not just with our direct suppliers, but all the way down our supply chains.



## Supplier due diligence

### Independent screenings

When deciding on a strategy to mitigate modern slavery risks in our operations and supply chains, UnitingSA identified the need to assess all suppliers for risks, not just those in high-risk industries or areas.

While those suppliers would receive the focus of UnitingSA’s due diligence process, we felt the need to conduct preliminary assessments across our entire supplier base to capture a broader range of risks.

As part of our broader compliance framework strategy, UnitingSA uses a third party that screens for 29 different risk areas, including modern slavery (Table 3).

The screening system uses publicly available information from over 2,500 sources.

UnitingSA recognises that human rights, bribery and corruption risks can often present where modern slavery practices may be used. By screening across a broader scale of risk areas, UnitingSA can commence further due diligence for suppliers that return any concerning results.

UnitingSA acknowledges that the comparative risk of our direct suppliers is low. On this basis, we were pleased to identify that 97 per cent of our suppliers presented no hits or unrelated/low risk hits on the platform. We found that just 1 per cent of our supplier base displayed results that indicated a high-risk profile, and the other 2 per cent of our suppliers presented hits that indicated a moderate risk (Figure 4).

<b>Integrity risks</b>	Corruption and bribery, serious and organised crime, terror, anti-competitive behaviour, government connections, fraud, money laundering, tax non-compliance and sanctions and restrictions.
<b>Environment, social and governance risks</b>	Modern slavery, animal welfare, sales and marketing practices, health and safety, human rights, environmental degradation, employment practices, governance and management and regulatory enforcement.
<b>Data and cyber risks</b>	Intellectual property, personal data privacy and data security.
<b>Operational and quality risks</b>	Industry presence, product and service quality, operational quality and business continuity.
<b>Identity risks</b>	Transparency and source of wealth.
<b>Financial risks</b>	Financial stability and financial irregularities.

Table 3. Risk areas that were screened by a third party

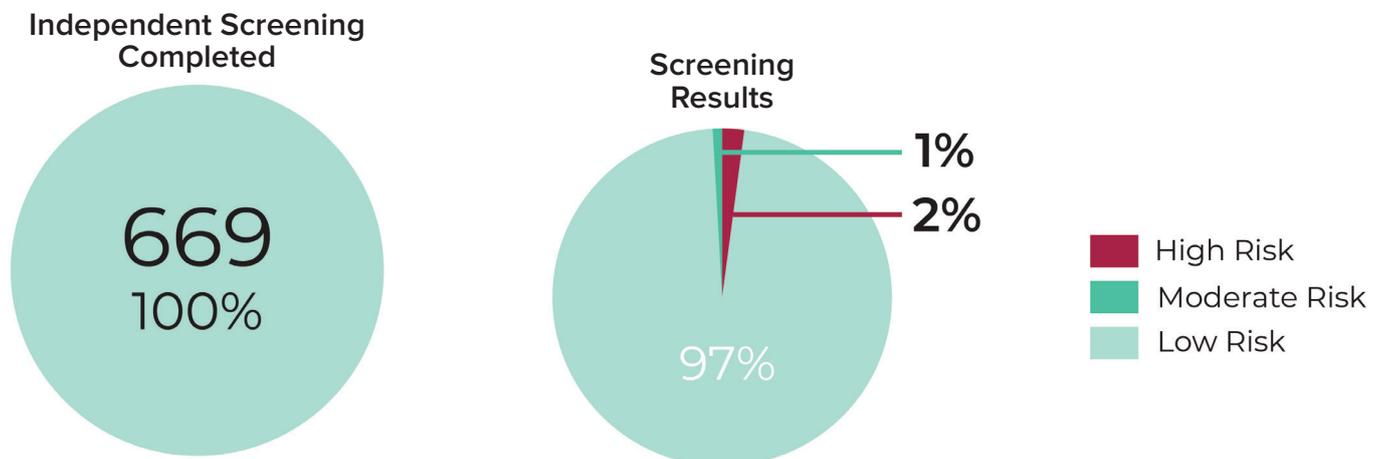


Figure 4. Summary of risk profiles of suppliers

**Risk matrix**

UnitingSA sees conducting independent screenings across our entire supplier base as an important step in identifying potential modern slavery risks. However, we prefer to view this step as an effective preliminary measure to identify significant immediate risks. Accordingly, we implemented an assessment on our suppliers to identify those that present the highest risks by developing a risk matrix (Figure 5).

The purpose of the risk matrix is to categorise a supplier as high risk, moderate risk or low risk based on its location and industry. In addition, we used our spend with suppliers as an indicator of potential risk and classified suppliers with a high spend as higher risk on this basis.



Figure 5. Number of matrix assessments completed during this reporting period

**Questionnaire**

UnitingSA determines that one of the most effective approaches to identify the risks of modern slavery practices in our operations and supply chains is to work collaboratively with our suppliers.

We developed an online questionnaire to allow our suppliers the opportunity to tell us about their organisation and measures to combat modern slavery in their own operations and supply chains.

The questionnaire includes sections which consider a supplier’s basic information, including their workforce, efforts to address modern slavery risks, supply chains and, where applicable, the source of their raw materials.

The responses have been extremely positive and risk profiles of suppliers were downgraded once the due diligence process was conducted (Figure 6).

**Results of Completed Questionnaires**



Figure 6. Risk results from completed questionnaires

**Remediating modern slavery risks**

To date we have not encountered any actual instances of modern slavery that have required remediation. However, we acknowledge that even in a lower risk environment, having a process is essential so that we can address risks if and when they arise. We considered that part of an effective compliance framework should include steps for remediation.

While our initial due diligence has not resulted in immediate risks, if risks are identified we have the basis of a remediation framework with which to initiate remediation.

**Other remediation aspects**

**Communication**

Currently we are identifying that many of our suppliers do not have adequate systems in place to assess risks of modern slavery. The open channels of communication that we maintain with our suppliers have allowed us to discuss potential modern slavery risks with them.

This has enabled us to gain a greater understanding of their operations and make a more accurate assessment of their risk profile based on the additional information exchanged.

## Risk movement

As described on page 12, UnitingSA's newly developed digital platform has proven invaluable in helping to track our progress.

The digital platform allows us to ensure we are aware of any actions that are outstanding or overdue, whether this relates to policy updates, supplier communication or follow up to ensure a supplier completes our questionnaire. This framework promotes a business position of accountability, ensuring all parties follow through with assigned obligations (Figure 7).

### Individual supplier movement

While we understand the importance of tracking our suppliers as a whole, we need to efficiently track individual supplier risk profiles. Our digital platform allows us to track the risk profile of each supplier.

On this basis, we have developed a process which shows how an individual supplier moves through the workflow and how their risk rating may evolve as we learn more about their organisation. This data can be imported into a graph to allow us to visually track the supplier's progress (Figure 8).

UnitingSA will also be refreshing due diligence on suppliers to track if a risk profile of a supplier changes.

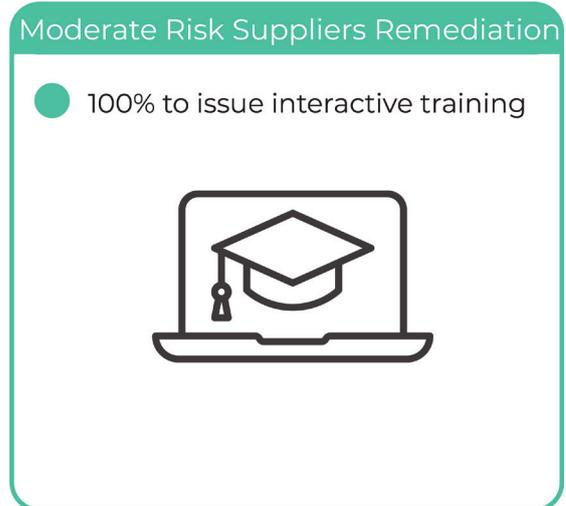


Figure 7. Example of how the digital platform measures our remediation actions

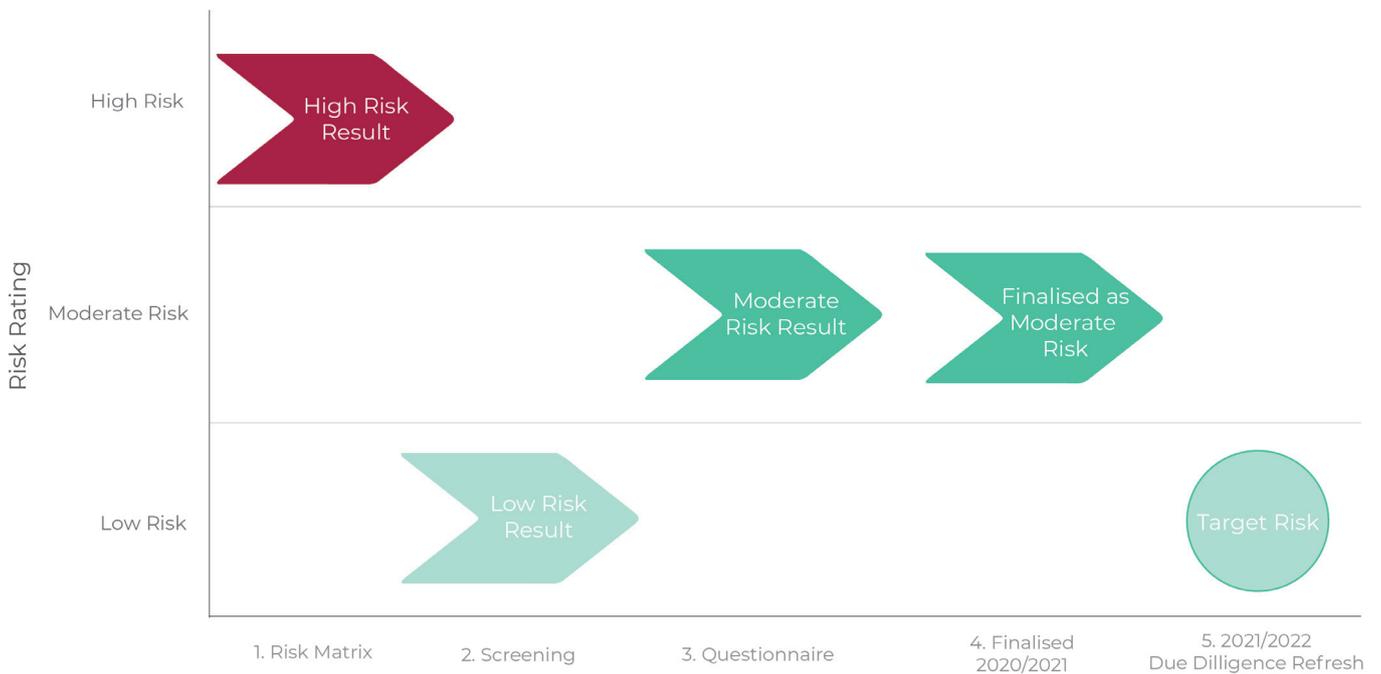


Figure 8. Graph used to track an individual supplier's progress and the evolution of its risk rating



# EVALUATION

## Assessing the effectiveness of actions

**UnitingSA recognises the need to continually evolve and improve our processes and procedures to ensure that our framework is current and effective.**

Given that many of the systems and procedures have been recently implemented, we have not yet commenced reviewing the effectiveness of our actions. In the next reporting period, we will be in a better position to assess the effectiveness of our actions, and will perform the following actions.

- **Review our policies**

We will review our Supplier Code of Conduct in order to address any gaps, and to strengthen the Code based on our learnings in this reporting period. We intend to implement an updated version of the Supplier Code of Conduct in the next reporting period, and will continue to periodically review all of our policies to ensure we continue to adapt our procedures to maximise effectiveness.

- **Review our procurement practices**

UnitingSA has identified enhancing our procurement practices to ensure effective engagement with our suppliers as a key goal for the next reporting period. We are conducting a gap analysis, reviewing supplier engagement, implementing supplier engagement packs and workflows. We are also centralising our procurement function.

- **Review our procedures**

We have made several changes to our policies and processes in order to incorporate our modern slavery compliance framework. During the next reporting period, we will be revisiting these changes to assess where gaps may have been formed and whether our policies are producing the results we expected. We are looking forward to making an assessment on how effective these measures have been in our next reporting period.

## Consultation

**This Modern Slavery Statement has been lodged by UnitingSA Ltd ABN 29 335 57 988 on behalf of the UnitingSA group.**

As the Reporting Entity, UnitingSA Ltd governs and controls all the entities that comprise the UnitingSA group. This Statement represents a group-wide response. Key figures across all entities were involved in the production of this Statement, including procurement, executive and management teams.

Across these teams, extensive consultation and collaboration took place to ensure that this Statement accurately reflected the actions taken across the group.

To this end, we are proud that all procedures, policies, due diligence and other initiatives captured by this Statement have been implemented across all entities which make up the UnitingSA group. The Board has had general oversight over the collaboration process.



## Looking forward

**While proud of the significant progress we have made to address and assess risks of modern slavery in our business, we strive for continuous improvement and have identified areas where we can make further inroads.**

In the next reporting period some key actions that we intend to deliver are:

- the roll out an employee training program on modern slavery;
- the roll out of a modern slavery training program for our suppliers;
- a review of our procurement strategy; and
- enhancement of our due diligence procedures.

