

MODERN SLAVERY STATEMENT

**AUSTRALIAN PROVINCE OF THE SOCIETY OF
JESUS AND RELATED ENTITIES**

Reporting period 01 January 2024 to 30 December 2024



Australian Province of the Society of Jesus

1. INTRODUCTION

This is the fourth Modern Slavery Statement (“Statement”) submitted by the Australian Province of the Society of Jesus and its related entities (“Society of Jesus”) pursuant to the *Modern Slavery Act 2018* (Cth) (the “Act”).

The purpose of this Statement is to outline the Society of Jesus’s approach to ensuring we have a framework and processes in place to minimise the risk of modern slavery throughout our operations and supply chains.

We recognise that modern versions of slavery can occur in many forms and that everyone plays a part in the elimination of modern slavery as defined by the Act, this includes: slavery, servitude, human trafficking, forced marriage, forced labour, debt bondage, child labour, and deceptive recruiting for labour or services.

The Society of Jesus is committed to eradicating modern slavery and human trafficking by:

- Acting ethically and with integrity and transparency in all our business dealings and relationships; and
- Developing and implementing processes to minimise the occurrence of modern slavery and human trafficking within in our own business operations or our supply chains.

This Statement was approved by the Province of the Australian Province of the Society of Jesus on 28 June 2025.



Fr Quyen Vu SJ
Provincial

28 June 2025

2. ABOUT US – s.16(1)(a) of the Act

The Society of Jesus, more commonly known as the Jesuits, is a religious order of priests and brothers in the Catholic Church, committed to the service of Christ and his people established by Saint Ignatius of Loyola in 1540. The Australian Province of the Society of Jesus (“Province”) has seventeen (17) Jesuit Communities across Australia.

The Province is the canonical entity responsible for Jesuit works in Australia and New Zealand. We work together with many Partners in Mission, who share our vision of the service of faith and the promotion of justice. Accordingly, as further detailed below, the Society’s Universal Apostolic Preferences demands that we give priority to the marginalised and the excluded. Combating modern slavery is an integral part of this vision.

Our apostolic works or ‘ministries’ are operated through a number of companies incorporated under Australian law. The Society of Jesus in Australia Limited (**SOJA**) is incorporated under the *Corporations Act 2001* (Cth), registered as a charity, and has the Provincial (head of the Province) as its sole member and the Provincial and consultors (canonical advisors) as its directors.

SOJA is the sole member company of a range of entities that operate within the following Apostolic areas:

- Education
- Social /Welfare
- Jesuit and Ignatian Spirituality
- Fundraising
- Young Adult

All entities operating within the abovementioned Apostolic areas of the Province are incorporated under the *Corporations Act 2001* (Cth) and registered as charities with the Australian Charities and Not-for-profits Commission (“ACNC”).

The Province is in the process of incorporating / consolidating the remaining entities, these include:

- Jesuit Refugee Service Inc
- Sevenhill Cellars Inc
- Society of Jesus in Victoria “Trading as Jesuit Communications”.

This is a joint statement of consolidated entities pursuant to s.14 of the Act of the Society of Jesus and all related entities incorporated and unincorporated (s.16(1)(a) of the Act). All reference to section numbers in what follows, are to sections of the Act.

3. STRUCTURE, OPERATIONS AND SUPPLY CHAINS – s. 16(1)(b) of the Act

Organisational Structure

The Society of Jesus in Australia Limited (**SOJA**) is the Sole member entity of:

- ❖ **Jesuit Education Australasia Limited** - which is the Sole Member entity of
 - Saint Ignatius' College Riverview Limited
 - St. Aloysius' College Limited
 - Redfern Jarjum College Limited
 - Saint Ignatius' College Adelaide Limited
 - Xavier College Limited
- ❖ **Jesuit and Ignatian Spirituality Limited** - which operates retreat houses in Sevenhill (South Australia) and Sydney (New South Wales) and spiritual direction ministry across Australia.
- ❖ **The Cardoner Network Limited (formerly The Cardoner Project)**
- ❖ **Jesuit Mission Australia Limited**
- ❖ **Jesuit Social Services Limited**

We are currently working towards the incorporation / transfer of member of the following entities of which SOJA will become the Sole Member entity:

- ❖ **Jesuit Refugee Services**
- ❖ **Society of Jesus in Victoria ("Jesuit Communications")**
- ❖ **Sevenhill Winery Cellars Board**

The Australian Province will also include the 17 Jesuit Communities in the requirements contained within the Modern Slavery Act Statement.

SOJA is registered as a charity with the ACNC and our head office is located at 130 Power Street, Hawthorn VIC 3122.

Operations

Our operations are global and domestic and comprise a range of business units: Education, Community, Corporate Services, Finance, Mission and Partnership, Operational Support, Fundraising, Faith Formation.

Our operations include:

- the provision of Jesuit and Ignatian Spirituality services
- the provision of education (Primary and Secondary and Early Years)
- the provision of a wide range of community support services including, mental health and care support, family and relationships services, sustainable living support services, advocacy and social research, disaster recovery services, chaplaincy and pastoral care
- the manufacture of sacramental wine; and the provision of fundraising and community development

Supply Chains

The Province looks for suppliers that demonstrate a commitment to implementing policies and practices consistent with our own.

We purchase products and services from a broad range of suppliers across various sectors, including:

- Construction / Property development
- Renewable Energy Solutions (solar, rechargeable batteries)
- Clothing (uniforms)
- Facilities management – security, maintenance, landscaping
- Food services
- IT equipment and software
- Vehicles
- Professional services
- Legal and consultancy
- Insurance
- Marketing and advertising
- Furniture and fittings
- Utilities

The major supply chains in relation to our schools are:

- Technology (laptops and other computers);
- Construction (school buildings);
- Energy;
- Clothing (uniforms);
- Food; and
- Employment.

The major supply chains in relation to our social ministries are:

- Foreign immersions (participants in social programmes volunteering overseas);
- Food (social enterprise restaurant in Sydney);
- Social enterprise funding overseas (by Jesuit Mission Australia).

The major supply chain in relation to our spirituality ministries and unincorporated communities relates to employment of externally contracted food and cleaning staff.

Investment Portfolio

The Province Investment Portfolio, which is managed on our behalf by external investment managers, follows ethical guidelines relating to investment opportunities.

The Province is opposed to financially supporting (through investments) industries and companies that could cause significant harm to the children, young people and families that we support through our services. We do not intend to directly or indirectly invest in companies with any significant involvement in the gambling, alcohol, armaments, vice, payday lending or tobacco industries. We recognise that these high-risk industries may also have links to modern slavery concerns.

4. RISKS OF MODERN SLAVERY – s. 16(1)(c) of the Act

Operations

This is our fourth report, we have identified that certain areas of operation, especially unethical practices in subcontracting on construction sites, overseas operations funded by monies raised in the Province and immersions could pose particular risks of modern slavery – but are unaware of any particular instances where this has, in fact, occurred. We are committed to ensuring that all our employees have access to the resources and supports necessary to report modern slavery practices should they be identified.

In addition, we are of the view that technology (manufacturing of computers), construction (employment conditions of building staff and manufacturing of building materials) and school uniforms (conditions of manufacture of clothing) and the provision of Food and Food Services are likely to be at higher risk for modern slavery.

The Province recognises that as an employer of approximately 2,600 people across a range of different Apostolic works, it can cause, contribute, or be directly linked to modern slavery risks. However, we believe this risk in our workforce to be low, particularly due to the strict regulations and legislation in the education and social services sector, and employment laws that we are required to comply with.

Our employment framework includes:

- People & Culture Policies and Procedures that support operational recruitment and ongoing employment practices.
- A Code of Conduct.
- Mandatory employment screening practices and verification of right to work in Australia for all employees.
- All employees, temporary staff, labour hire staff and partnership workers are required to have a valid Working with Children Check before commencing work, and at all times while working with any entity of the Province. As well as undergo regular Criminal History Checks.
- Industrial regulations (awards, agreements, employment contracts) that govern employment relationships.

Supply Chains

The Province is an Australian based organisation delivering services predominantly in Australia, which is identified as 'low' risk in The Global Slavery Index¹.

We understand that we may be directly linked to a higher risk of modern slavery through our supply chains and our foreign immersions (participants in social programmes volunteering overseas) and social enterprise funding overseas (by Jesuit Mission Australia).

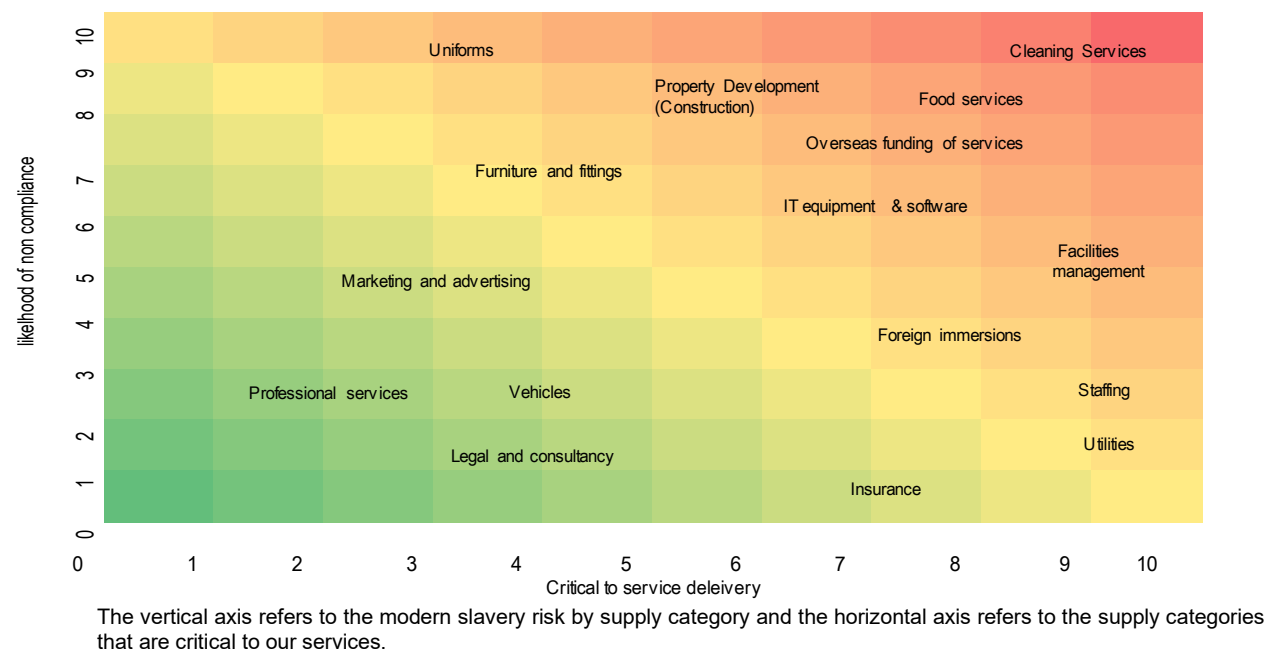
While we cannot control activities outside of our own organisation, including the possibility where some of our suppliers operate in countries where modern slavery risks are high, we continue to enhance our controls for risks to ensure that any supplier we work with is aligned with our mission.

The Province recognises that our supply chain is linked to high-risk industries, such as the procurement of IT equipment including computers and mobile phones. We are also

¹ <https://www.globalsslaveryindex.org/2018/data/maps/#prevalence>

aware that suppliers of these products and services may also have modern slavery risks within their supply chains, especially when they are being manufactured in countries that are considered to be ‘high’ risk by The Global Slavery Index².

Supply Chain Slavery Matrix



As detailed below (Section 5) we are, in partnership with Australian Catholic Religious Against Trafficking in Humans (ACRATH), and we continue to review our supply chain and are guided by the Australian Government’s Department of Home Affairs Guidance for Reporting Entities (“Guidance Report”) to determine risks against three categories:

1. being risks that may possibly cause,
2. contribute and/or be directly linked to modern slavery practices in the sector, industry, product and service types, and
3. geographic locations.

Over the next year, we will continue to focus on these potential risk categories and prioritise supplier engagement activities.

² <https://www.globalslaveryindex.org/2018/data/maps/#prevalence>

5. ACTION TAKEN – s. 16(1)(d) of the Act

Having ascertained the issue in early March 2022, we have begun working in partnership with ACRATH to identify areas of potential modern slavery in our supply chains, to raise awareness of the issue at all levels in the Province and to develop steps to combat it.

The following are actions taking during this reporting period:

Ongoing Actions

Education

The Australian Province has approximately 3,700 staff and volunteers who are at little risk of being victims of modern slavery. The staff of the Australian Province are, generally speaking, well educated, in stable employment and not impacted by the vulnerabilities of extreme poverty or uncertain visa status. In any event, staff have commenced training on our Modern Slavery Policy, Whistleblower Policy, Employee Assistance Program and general indicators of modern slavery as detailed in this report. Australian Province is well supported by volunteers who are also at minimal risk of being victims of modern slavery.

Due diligence of our supply chains

The Australian Province continued to make progress in addressing modern slavery risks within our operations during the 2024 reporting period. Our Consultative Committee, comprising members from across our organisation, has continued to develop educational initiatives relating to modern slavery. We have also made further improvements to organisational policy and procedures.

Overseas Projects

Our overseas projects operated on behalf of the Australian Province by Jesuit Mission Australia and The Cardoner Network continue to impel and enhance their Partnership Agreements with overseas partners ensuring oversight and compliance with this component of our supply chain through ongoing training and compliance reporting.

Modern Slavery Compliance Register

As indicated in our 2023 Modern Slavery Report, The Society of Jesus in Australia has established a Modern Slavery Compliance register. This ensures that all major contractors engaging with The Society of Jesus in Australia Limited adhere to the requirements of the Modern Slavery Act 2018 (Cth).

- **Stage 1** of the development of the Province Modern Slavery Compliance Register was to ensure that each of the Province Investments funds, which is managed on our behalf by external investment managers, have complied (where required) with the *Modern Slavery Act 2018* (Cth). - **Completed**
- Stage 2 of the development is to ensure all contractors that are required to comply with the *Modern Slavery Act 2018* (Cth) are complying – *Schedule for completion in the 2024 reporting period*. – **Completed**
- **Stage 3** of the development is to link major suppliers Environmental, Social, and Corporate Governance (ESG) reporting (Mandatory and Voluntary reporting) compliance – *not completed (See Future Endeavours)*.

New Actions

New Modern Slavery Framework, Roadmap and Policies

The Province has developed and adopted consistent approach to Modern Slavery, this includes:

- Province Modern Slavery Framework & Roadmap
- Modern Slavery Assessment toolkit
- Modern Slavery Compliance Reporting Policy
- Ethical and Sustainable Procurement Policy
- Code of Practice for Suppliers

covering all entities across the Province and aligning with the Department of Home Affairs guidance.

Oversight

The Society of Jesus in Australia (SOJA) Board revised the terms of reference for the SOJA Consultative Committee to include ongoing reporting on Modern Slavery compliance across the Australian Province. The Chair of the SOJA Consultative Committee will report to the SOJA Board regularly on matters relating to compliance, training and on development opportunities to reduce Modern Slavery within our supply chain.

Future Endeavours

Our priority in the next reporting period is to continue to expand our due diligence in high-risk sectors, including strengthening education of suppliers, conversations with higher risk suppliers about means of improving awareness and reporting of modern slavery within their supply chain.

The Province has commenced a project to identify, review and implement an information technology platform to assist in supplier risk assessment, engagement, and compliance reporting. This will increase the identification of supplier risk beyond the Tier 1 assessments and will also look to introduce links for major suppliers Environmental, Social, and Corporate Governance (ESG) reporting (Mandatory and Voluntary reporting).

One of our major projects for the coming year is to develop a dataset that provides a foundational assessment of supplier engagement, transparency, and modern slavery risk management. It is anticipated that this project will identify key trends, areas requiring further attention, and opportunities to strengthened due diligence. The data points reflect supplier visibility and compliance activities, ensuring a comprehensive approach to ethical sourcing and governance.

6. ASSESSING EFFECTIVENESS – s. 16(1)(e) of the Act

This is our fourth report, and the architecture of compliance is now in the process of being finalised as described above. We are therefore not fully in a position to assess the effectiveness of compliance mechanisms fully.

To date, no instances of modern slavery have been reported or found within our operations or associated with our supply arrangements. However, we appreciate that this does not necessarily mean that we do not have any cases of modern slavery. The Australian Province, therefore, continues to review the effectiveness of our Modern Slavery Risk

Management procedures, including assessment of high-risk suppliers across all entities of the Australian Province and employee and supplier awareness training.

Monitoring our compliance is essential to ensure that policies and procedures are effective and operating. Through the SOJA Consultative Committee we seek to track our progress in relation to modern anti-slavery action by setting goals and future action plans for each year. We will continue to use goal setting/action plans and assessment of completion against these as our primary metric for measuring the success of modern slavery initiatives. We will also continue to review and evaluate our performance.

7. CONSULTATION – s. 16(1)(f) of the Act

The entity giving this statement under s.14 is the Provincial of the Australian Province of the Society of Jesus. The issue of modern slavery is regularly raised at the Ministries Commission (the body responsible for coordinating the works of Jesuit ministries) and now with the responsibility for oversight via the SOJA Consultative Committee.

8. OTHER ISSUES – s. 16(1)(g) of the Act

In February 2019 Father General Arturo Sosa SJ, the Superior General of the Jesuits worldwide, launched the Jesuits' Universal Apostolic Preferences (UAP's) stating:

“With these universal apostolic preferences, we resolve to concentrate and concretize our vital apostolic energies during the next ten years, 2019-2029. We accept them as a mission of the Church through Pope Francis, who has approved them by confirming the communal discernment that was undertaken by the apostolic body.”

In early 2019, Fr Brian McCoy SJ, the then Provincial, released the Australian “Province Apostolic Plan (2019-2024)”, both these documents work together to give purpose to our mission and to provide direction for the Province's Jesuits and Partners in Mission.

One of the Preferences within in the *Universal Apostolic Preferences* is “**to walk with the excluded**” walk with the poor, the outcasts of the world, those whose dignity has been violated, in a mission of reconciliation and justice. It is therefore part of our mission to be sensitive to situations of exploitation and to address these.

In 2024, Fr. Quyen Vu SJ, Provincial, commenced a process for the development of a new Apostolic Plan. The Plan is due for completion in late 2026 and will extend from 2027 – 2036.

The outcome will be a blueprint for the province with a 10-year horizon, reflecting the ‘Universal Apostolic Preferences’ 2019 – 2029) as presented by Fr General, Arturo Sosa SJ. The UAPs are the central template of apostolic planning at all levels of the Society of Jesus and the *Universal Apostolic Preferences* “**to walk with the excluded**” will continue to serve as a main focus of the Australian Province new Apostolic Plan.