

MODERN SLAVERY STATEMENT 2025





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Declaration

This statement outlines the activities of Townsville Catholic Education (TCE) to address modern slavery risks in business and supply chains for the financial year period ending 31 December, 2025. This statement is made pursuant to Section 13(1) of the *Modern Slavery Act (Cth) 2018*, and is presented to comply with the mandatory criteria outlined in the Guidance for Reporting Entities: *Commonwealth Modern Slavery Act 2018* (May 2023).

TCE is an agency of the Roman Catholic Trust Corporation for the Diocese of Townsville, which is registered as a charity with the Australian Charities and Not-for-profits Commission (ABN 13 622 319 794).

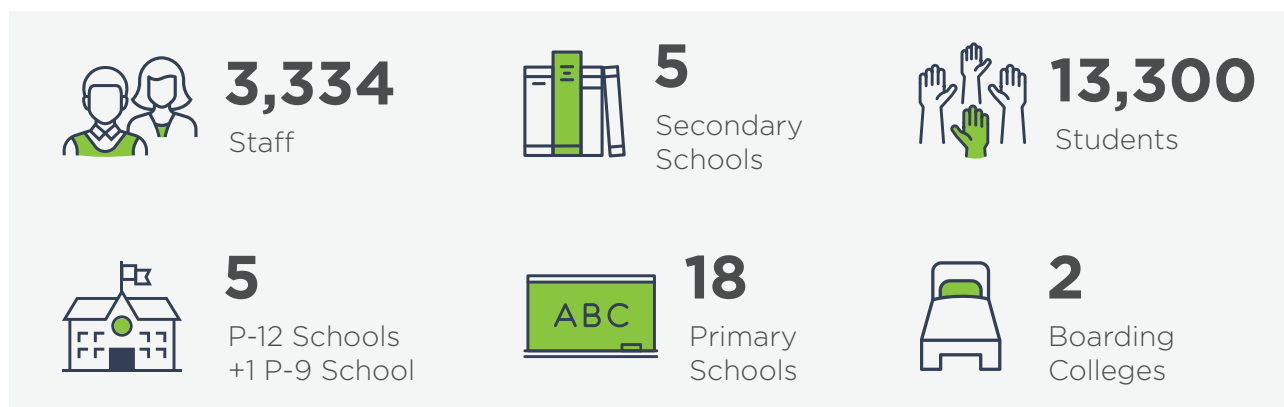
This statement has been approved by the Roman Catholic Trust Corporation for the Diocese of Townsville as the governing body of Townsville Catholic Education, and signed by the Bishop of Townsville who is the sole trustee of the Corporation.

Most Rev. Timothy J. Harris DD

Bishop of Townsville, June 2026

(Sole Trustee, Roman Catholic Trust Corporation for the Diocese of Townsville)

Criteria One



About Townsville Catholic Education

TCE supports 30 schools in our Diocese, in a region extending to Mount Isa in the west, Proserpine in the south and north to Halifax. The mission of TCE is to provide services which support schools in achieving quality outcomes for students and in promoting the ongoing development of Catholic education. Our schools range from large prep to year 12 colleges to small rural primary schools in townships such as Winton and Collinsville.

As of 31 December 2025, TCE's annual budget expenditure totalled \$342,876,949. While financial reporting covers the full calendar year, the staffing figure of 3,334 reflects the workforce as of 2 December 2025. This total encompasses all full-time, part-time, and casual staff to fully represent our entire workforce. This earlier date provides a more accurate representation of our operational strength before seasonal contract conclusions and end-of-year school transitions.

TCE Governance Framework

Under the Bishop's delegation, the Executive Director leads TCE in ensuring all schools are equitably resourced through centralised services. Supported by three specialised directorates, TCE maintains a system-wide approach to funding and support. Guiding this work is the Diocesan Education Council (DEC), the Bishop's primary advisory body. Working alongside the Executive Director and leadership team, the DEC ensures our educational mission aligns with the Church's broader vision and serves our local communities effectively.

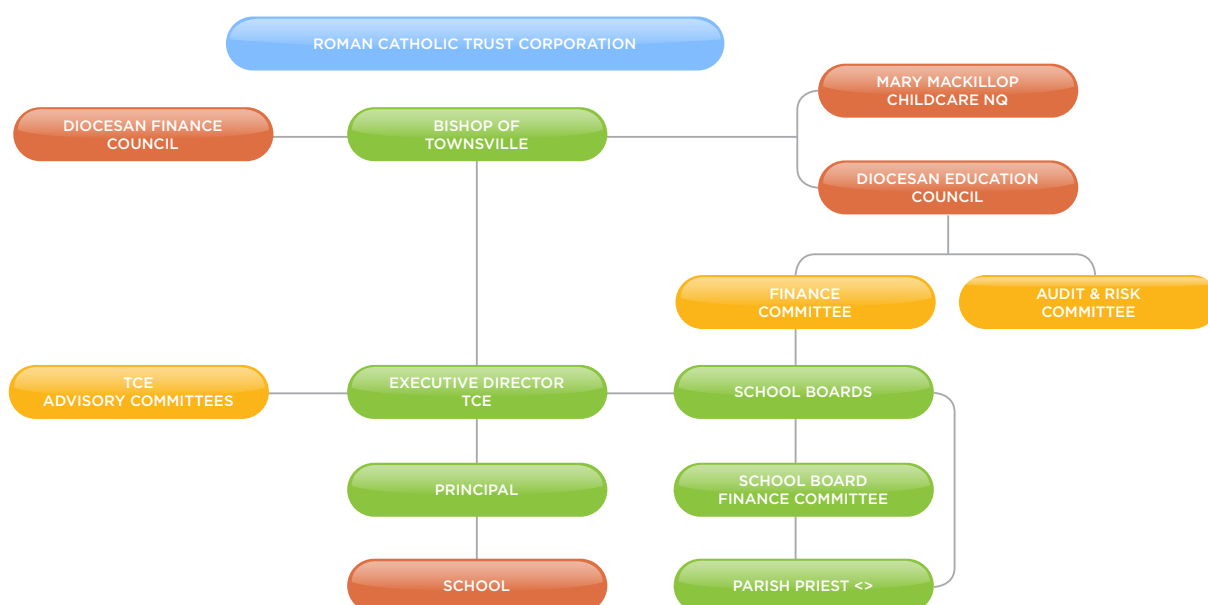


Figure 1—Structure of the Roman Catholic Trust Corporation for the Diocese of Townsville.

Strategic Directions

The TCE Strategic Directions 2022–2026 provide the structure to achieve the organisation's objective of guaranteeing every student has a valuable Catholic school education. This structure includes the Strategic Intention and six key areas to direct activities.

Strategic Intention

Systemic Catholic schools in the Townsville Diocese strive to ensure that each student can experience the joy of learning and achieve success as a learner, guided by teachers who are inspired by Jesus Christ. This vision for systemic Catholic schooling will build on our traditions and expertise and embrace new possibilities. Through collaboration, co-responsibility, diversity and ongoing renewal of mission and purpose, our Catholic schools will plan for a future that is hope-filled and sustainable.

Learning and Teaching

which inspires each student's high expectations.

An experience of Faith and Mission

which enriches student's lives and futures.

Authentic Faith Leadership

which inspires all to witness the Mission.

Diversity and Wellbeing

practices which prioritise care and dignity for all.

Strengthening Capabilities and Partnerships

to foster community.

Governance and Sustainability

to manage stewardship of resources.

Criteria Two

Operations and Supply Chains

Operations

Townsville Catholic Education including its schools/colleges, continues to engage in the following operational activities in pursuit of business objectives and educational delivery across Australia:

- Direct employment of teaching and support staff
- Delivery of core educational, vocational, and boarding services
- Procurement of goods and services to support learning outcomes
- Development and maintenance of school infrastructure and facilities
- Management of financial investments and community partnerships
- Facilitation of staff and student travel, immersions, and hospitality

Supply Chains

In 2025, TCE engaged 1,819 suppliers. Schools are estimated to have engaged between 1,000 and 1,300 additional suppliers directly. This decrease in direct school-managed suppliers reflects the successful expansion of TCE's centralised accounts payable system, which continues to bring local procurement under central oversight. Across our most frequently used suppliers — defined as those with over 100 invoices — TCE spent a total of \$9,893,022 across 30 suppliers. This represents 17% of our total spend. Our largest supply categories in 2025 remained consistent:

- Energy
- Information technology (hardware and software)
- Insurance
- Building repairs and maintenance
- Travel and accommodation
- Fleet management

These categories remain the primary focus of our procurement activities and are prioritised for modern slavery risk assessments. The ongoing centralisation of accounts payable has significantly strengthened our visibility of expenditure, supporting improved contract management and more robust risk mitigation across the system.

Services

Consulting & Professional Services: Legal, accounting and architectural services; educational and market research.

Property & Facilities: Leasing and property management; utilities (energy, water, gas); cleaning, waste removal and security services; grounds maintenance.

Investment & Finance: Management of term deposits and ethical investment portfolios; banking services and insurance brokerage.

Labour Hire & Personnel: Recruitment services for relief teaching and administrative staff; Employee Assistance Programs (EAP); professional development and accredited training.

Community & Support: Direct donations to charitable organisations; student health services; vocational training partnerships (RTOs).

Products

ICT Equipment & Technology: Laptops, tablets and classroom hardware; software licensing; cloud-based learning platforms and data storage.

Textiles & Apparel: Manufacture and supply of school uniforms, staff corporate wear, sportswear and branded promotional textiles.

Educational & Office Supplies: Curriculum-specific resources, textbooks, classroom stationery.

Infrastructure & Fit-out: Construction materials and equipment for capital works; specialised furniture for classrooms, laboratories and workshops.

Print & Media: Publication printing (annual reports, yearbooks); signage and environmental branding; digital advertising and marketing materials.

Fleet & Logistics: Purchase and leasing of school buses and light vehicles; maintenance parts and fuel cards; catering and food supplies for boarding houses.

Criteria Three

Identifying Modern Slavery Risks

SUPPLY CHAINS PRODUCTS AND SERVICES → Medium to High Risk

TCE has identified risks in the range of supply chain levels that encompass international vendors, especially those linked to electronics, clothing, car production and products such as cleaning agents. The following are some of the long supply chain categories identified.

- **Construction & Infrastructure:** Building materials, maintenance supplies and fit-out materials for both new school sites and existing office spaces.
- **Technology:** Information Communications Technology (ICT) equipment, which often involves high-risk raw material sourcing.
- **Textiles:** School and staff uniforms, sports apparel, and protective laboratory gear.
- **Operations & Logistics:** Office consumables, printing/promotional goods, vehicles, fuel, and cleaning services.
- **Global Outreach:** Charitable donations directed toward overseas entities.

As Mary Help of Christians Catholic College, Shaw (the recently opened secondary college) enters its next stage of development and prepares for future intakes, the procurement risks remain significant

and consistent with previous assessments. The risk associated with this project has been assessed as medium, reflecting the complexity and length of the supply chains involved, and aligned with TCE's ongoing capital works and maintenance programs.

WORKFORCE → Low Risk

TCE and its schools directly employ all staff under legally compliant contracts and enterprise agreements consistent with the *Fair Work Act 2009* (Cth). Eligibility to work checks are mandated during recruitment. Labour hire and consultancy providers are contractually required to meet the same employment standards. As a result, this risk is considered low.

INVESTMENTS → Low Risk

The Roman Catholic Trust Corporation for the Diocese of Townsville invests in regulated Australian term deposits. Due to the oversight and transparency of the domestic financial system, this risk is also assessed as low.

RESEARCH → Low risk

TCE controls risk relating to research undertaken in the organisation through scrutiny of applications mandated by established TCE research guidelines. All research activities undergo Executive Director approval and must comply with the research guidelines. As a result, this area is considered low risk.



Criteria Four

Actions to Address Risks

Governance and Audit

The TCE Modern Slavery Working Group comprises representatives from key teams including People and Safety, Governance, ICT and Finance/Procurement. The group aims to meet twice each year, with an agenda focusing on discussions to identify, review and address modern slavery risks. Reporting accountabilities are to the TCE Strategy and Governance Forum, comprising TCE leadership staff, which meets regularly throughout the year.

The process for assessing Modern Slavery is integrated into TCE governance through the TCE Risk Management Framework. The Diocesan Education Council received the 2024 Modern Slavery Statement at the August meeting, following discussion at the DEC Audit and Risk Committee. This reporting process, along with engagement of the Strategic Leadership Team, ensured executive understanding of modern slavery risks, mitigations and reporting requirements. Catholic Education Queensland Limited (CEQL) Governance Network supports the governance efforts of all Queensland dioceses.



Figure 2: TCEO Governance Structure—Modern Slavery

Addressing Modern Slavery Risks - 2025 Activities

Activity	Date
2024 TCE Modern Slavery Statement submitted	June
Modern Slavery Working Group Meeting	December
Review of TCE risk register for modern slavery	December
Desktop Audit of top suppliers	Ongoing
Review of TCE Modern Slavery Position Statement	Ongoing
Centralisation of accounts payable functions	Ongoing
Standard Services Contract work	Ongoing

Building on earlier work

Building on the work commenced in recent years, TCE continued to strengthen its governance and procurement controls throughout 2025. By refining our structural controls, we have improved oversight across both our workforce and supplier arrangements to further mitigate modern slavery risks.

Operational Centralisation & Governance

During 2025, TCE focused on consolidating key administrative functions to ensure high-level visibility and compliance:

- **Accounts Payable (AP) Consolidation:** The continued centralisation of AP functions has significantly matured our supplier governance. This year, we consolidated supplier arrangements. By reducing duplicate vendors and strengthening vetting practices, we identified and removed entities that did not meet our organisational standards.
- **Contractual Standardisation:** We have continued to centralise service agreement processes and employment contract management. This transition to standardised contractual arrangements ensures that consistent, compliant terms are applied across the organisation, reducing the risk of errors that could lead to labor exploitation.
- **Procurement Controls:** Ongoing reviews of supplier engagement processes and documentation requirements have further strengthened our ability to identify and respond to potential risks within our supply chain.



Workforce

Our commitment to providing fair, favorable, and equitable working conditions remains a cornerstone of our operations, mandated through the *DEC Equal Opportunity Policy*, the *DEC Enrolment Policy*, and the *TCE Staff Code of Conduct*.

We have further strengthened this commitment by explicitly referencing our adherence to Modern Slavery prevention within the *Recruitment & Selection Guideline*. During recruitment, we strictly verify eligibility to work and set clear expectations: every employee must adhere to the *TCE Staff Code of Conduct*, and all supporting policies.

To further bolster our internal controls, we have continued our established programs, but also introduced a new role:

- **HRIS Audit & Administration (New):** A new dedicated role has been introduced within the HR team. This role facilitates comprehensive audit reports to ensure that allowances and benefits remain consistent and compliant based on specific position locations.
- **Mandatory Training (Continued):** As part of onboarding and annual compliance cycles, all staff must complete a module reinforcing the expectations of the TCE Staff Code of Conduct.
- **Intranet Resources (Continued):** The TCE staff intranet hub is updated annually with Modern Slavery information. This resource outlines TCE's proactive measures to address risks and identifies key reporting roles and responsibilities within the organisation.

Organisation-Wide Commitment

The development of the Modern Slavery statement represents TCE's commitment to maturing our governance and accountability frameworks regarding modern slavery risks. Our established governance structure provides a robust foundation for sustained action and continuous improvement across all operational areas.

TCE's dedication is anchored in our Modern Slavery Position Statement—the primary governance document outlining our intent, principles, and standards for modern slavery. This document ensures our strategic approach remains effective and aligned with the values expressed in Catholic Social Teachings.



Criteria Five

Assessing Actions

Assessing Actions and Progress

Each year, TCE undertakes a review to assess the effectiveness of actions implemented to address modern slavery risks across its operations and supply chains. This review process continues to support ongoing improvement, strengthen governance practices, and inform future actions and priorities.

TCE's progress in 2025 has been supported by increased organisational awareness, improved visibility of supplier and workforce arrangements, and the continued maturity of governance and procurement processes across the organisation.

During 2025, several actions contributed to strengthened oversight and improved risk mitigation outcomes, including:

- Continued centralisation of Accounts Payable functions, improving visibility, consistency, and oversight across supplier engagement and payment processes.
- Review and consolidation of supplier arrangements, reducing duplicate suppliers and enabling enhanced vetting and monitoring of suppliers against organisational compliance and governance expectations.
- Ongoing refinement of service agreement and contract management processes, including the increased use of standardised contractual documentation and procurement clauses addressing compliance obligations and modern slavery expectations.

- Continued centralisation of recruitment and employment contracting processes for general employees, reducing the risk of inconsistent or non-compliant employment arrangements and strengthening oversight of workforce practices.
- Continued reinforcement of staff expectations through annual compliance training, onboarding processes, and updated internal resources relating to the TCE Staff Code of Conduct and modern slavery awareness.

TCE continues to strengthen its internal capability to identify, assess, and respond to modern slavery risks. Progress is monitored through procurement and finance data, contract management practices, supplier reviews, workforce governance processes, and operational feedback mechanisms. The governance and operational improvements implemented over recent years, particularly the centralisation of key financial, workforce, and procurement functions, have enhanced TCE's ability to proactively identify potential risks and implement consistent mitigation strategies across the organisation.

Looking ahead, TCE will continue to strengthen supplier due diligence processes, enhance governance controls and risk assessment methodologies, and review supporting policies and procedures to ensure they remain contemporary, effective, and aligned with obligations under the *Modern Slavery Act 2018* (Cth).



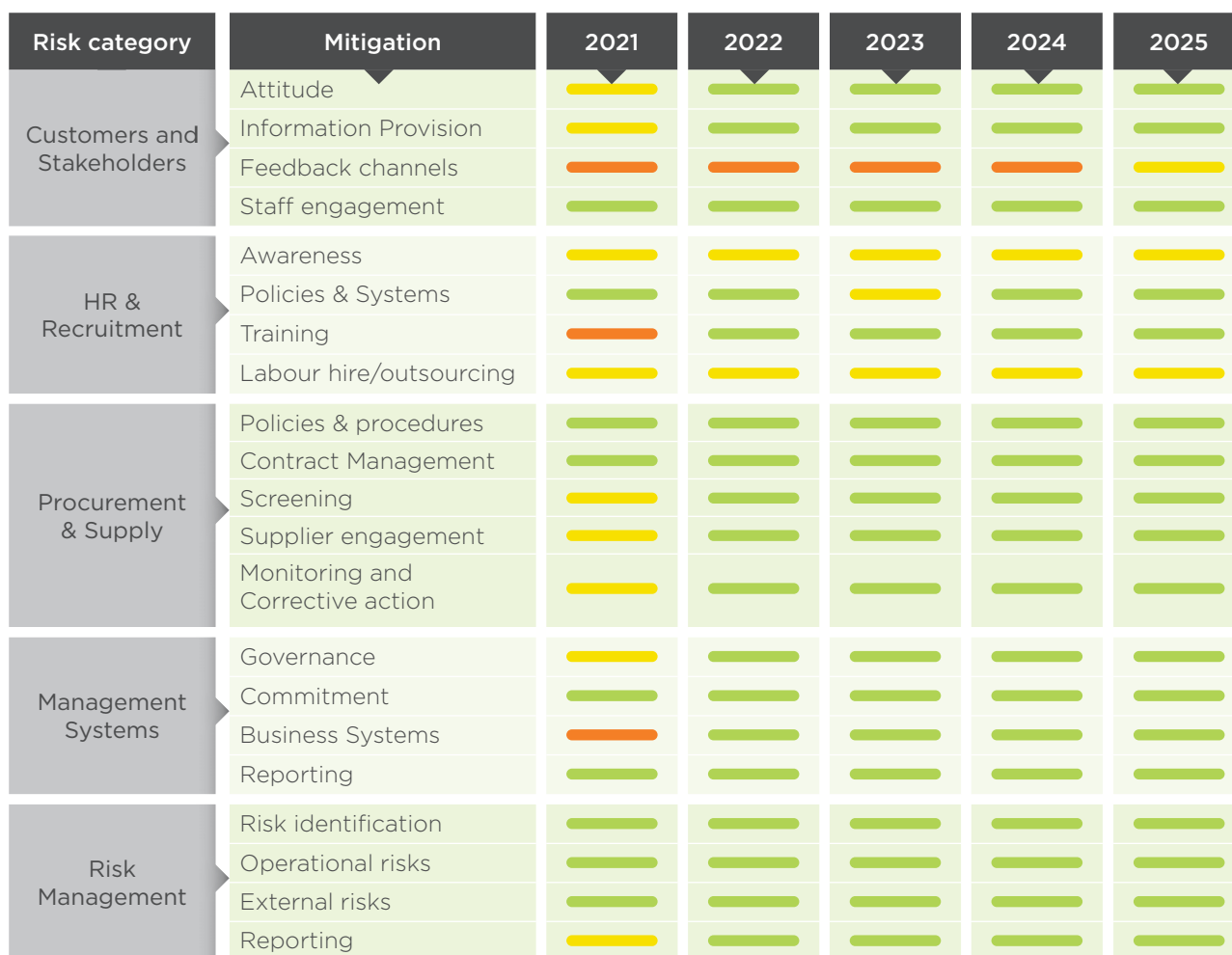


Figure 3: TCEO Progress in achieving key outcomes—Modern Slavery.

Investigating/preparing action Starting out Making progress

List of TCEO System Schools

- Burdekin Catholic High School, Ayr
- Columba Catholic College, Charters Towers
- Gilroy Santa Maria College, Ingham
- Good Shepherd Catholic College, Mount Isa
- Good Shepherd Catholic School, Rasmussen
- Holy Spirit Catholic School, Cranbrook
- Marian Catholic School, Currajong
- Mary Help of Christians Catholic College, Shaw
- Our Lady of Lourdes Catholic School, Ingham
- Ryan Catholic College, Kirwan
- Southern Cross Catholic College, Annandale
- St Anthony's Catholic College, Deeragun
- St Benedict's Catholic School, Shaw
- St Catherine's Catholic College, The Whitsundays
- St Clare's Catholic School, Burdell
- St Colman's Catholic School, Home Hill
- St Francis Catholic School, Ayr
- St Francis Catholic School, Hughenden
- St John Bosco Catholic School, Collinsville
- St Joseph's Catholic School, Cloncurry
- St Joseph's Catholic School, Mount Isa
- St Joseph's Catholic School, Mundingburra
- St Joseph's Catholic School, The Strand
- St Kieran's Catholic School, Mount Isa
- St Margaret Mary's College, Hyde Park
- St Mary's Catholic School, Bowen
- St Michael's Catholic School, Palm Island
- St Patrick's Catholic School, Winton
- St Peter's Catholic School, Halifax
- St Teresa's College, Abergowrie

Criteria Six and Seven

Consultation & Owned Entities

TCE does not own or control any external entities; therefore, this criteria is not applicable in a traditional corporate sense. However, TCE maintains a robust consultation framework with its network of schools and colleges.

A full list of TCE schools is provided in this statement. To ensure consistent risk management, school and college leadership teams have direct access to modern slavery resources, reporting templates, and risk mitigation tools via the TCE staff intranet and public website. Furthermore, our modern slavery progress and compliance efforts are regularly communicated to our governing body, the Roman Catholic Trust Corporation for the Diocese of Townsville, ensuring alignment with diocesan-wide governance standards.

Other considerations

TCE remains dedicated to upholding globally acknowledged human rights standards and ensuring our operations align with both Australian law and the principles of Catholic Social Teaching.

- Our framework is informed by a comprehensive map of legal and regulatory obligations. We move beyond one-off reviews by conducting periodic assessments of our policies to ensure they reflect the latest developments in human rights and workplace equality legislation.
- We view the mitigation of modern slavery as an evolving responsibility. Our strategy is focused on moving from risk identification to proactive management, ensuring that every person within our supply chain and workforce is treated with the dignity and respect they deserve.
- As a Catholic organisation, we recognise our role as ethical stewards. We continue to refine our procurement and HR practices not just for legislative compliance, but to ensure our commercial footprint contributes to the common good.

“ Every person and all people, are equal and must be accorded the same freedom and the same dignity. Any discriminatory relationship that does not respect the fundamental conviction that others are equal is a crime, and frequently an aberrant crime.”

— Pope Francis

