

2025

Modern Slavery Report



Kildare
MINISTRIES

Acknowledgement

Kildare Ministries respectfully acknowledges the Traditional Owners of the land on which our schools and community works are located.

We acknowledge the continued deep spiritual attachment and relationship of Aboriginal and Torres Strait Islander peoples to this country and commit ourselves to the ongoing journey of reconciliation with First Nations peoples and communities.

Message from the Executive Director

At Kildare Ministries, our commitment to justice is grounded in a deep respect for the dignity of every person. This commitment calls us to be attentive not only to what happens within our own ministries, but also to the broader impact of our decisions — including the goods and services we procure.

Modern slavery is a complex and often hidden reality, present in global and domestic supply chains. As a network of schools and community works, we recognise both our responsibility and our opportunity to respond with integrity, transparency and purpose.

During 2025, we have continued to strengthen our approach through the expansion of our supplier risk assessment processes, deeper engagement with suppliers, and ongoing education across our ministries. These efforts reflect a growing maturity in how we understand and address modern slavery risks.

We also recognise that this work is ongoing. There remain areas where visibility is limited, particularly beyond our direct suppliers, and where further progress is needed. We are committed to continuous improvement - learning, refining our practices, and working collaboratively with others to reduce the risk of exploitation.

Importantly, our response is not only about compliance. It is an expression of who we are. Through our schools and community works, we seek to form communities that are attentive to injustice and committed to action - ensuring that respect for human dignity is reflected in both our values and our practices.

I thank all those across Kildare Ministries who have contributed to this work and continue to support our shared commitment to justice. This commitment is grounded in our mission and values, which guide our response to modern slavery and inform the actions outlined in this Statement.

Nicole Mangelsdorf

Executive Director



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Executive Summary

For the purposes of the *Modern Slavery Act 2018 (Cth)* (the Act), the Trustees of Kildare Ministries (ABN 80 991 443 722) is the reporting entity responsible for preparing and publishing this Modern Slavery Statement.

This Statement outlines the risks of modern slavery practices within the operations and supply chains of Kildare Ministries and its controlled entities, and the actions taken during the 2025 reporting period to assess and address those risks.

This Statement constitutes Kildare Ministries' fifth Modern Slavery Statement and has been approved by the principal governing body in accordance with section 13 of the Act.

This statement is a joint submission on behalf of the group. The individual entities within the group fall below the \$100 million revenue threshold for the reporting period.



Our Commitment

The Mission, Vision and Values of Kildare Ministries are deeply rooted in Catholic Social Teaching. We seek to nurture communities that cherish human dignity, promote the common good, and respond to injustice with courage and compassion.

Together, across our ministries, we are committed to ethical and responsible practices that uphold the fundamental rights of all people.

Kildare Ministries maintains a clear and uncompromising stance against modern slavery and human trafficking. We are committed to ensuring that these practices have no place within our operations or our supply chains. Through governance, policy and education, we continue to strengthen awareness among Trustees, Boards, leadership teams and employees so that responsibilities for identifying and reporting potential risks are clearly understood.

During the past year we have continued to build awareness within our schools and ministries, recognising that the choices we make as organisations – including our procurement practices – can influence the lives and wellbeing of people throughout the supply chain. Our schools also seek to form students who are attentive to issues of justice and human dignity, encouraging them to consider the human impact of the goods and services they consume.

We recognise that safeguarding human rights requires ongoing vigilance and sustained effort. Kildare Ministries remains committed to strengthening our practices, working with suppliers who demonstrate respect for human rights, and collaborating with partners to reduce the risk of exploitation, including child labour, within our supply chains.

Section One:

Covered Entities

This section of the statement addresses the requirement of Section 16(1)(a) of the Modern Slavery Act 2018 by providing an overview of which entities are covered by the statement.

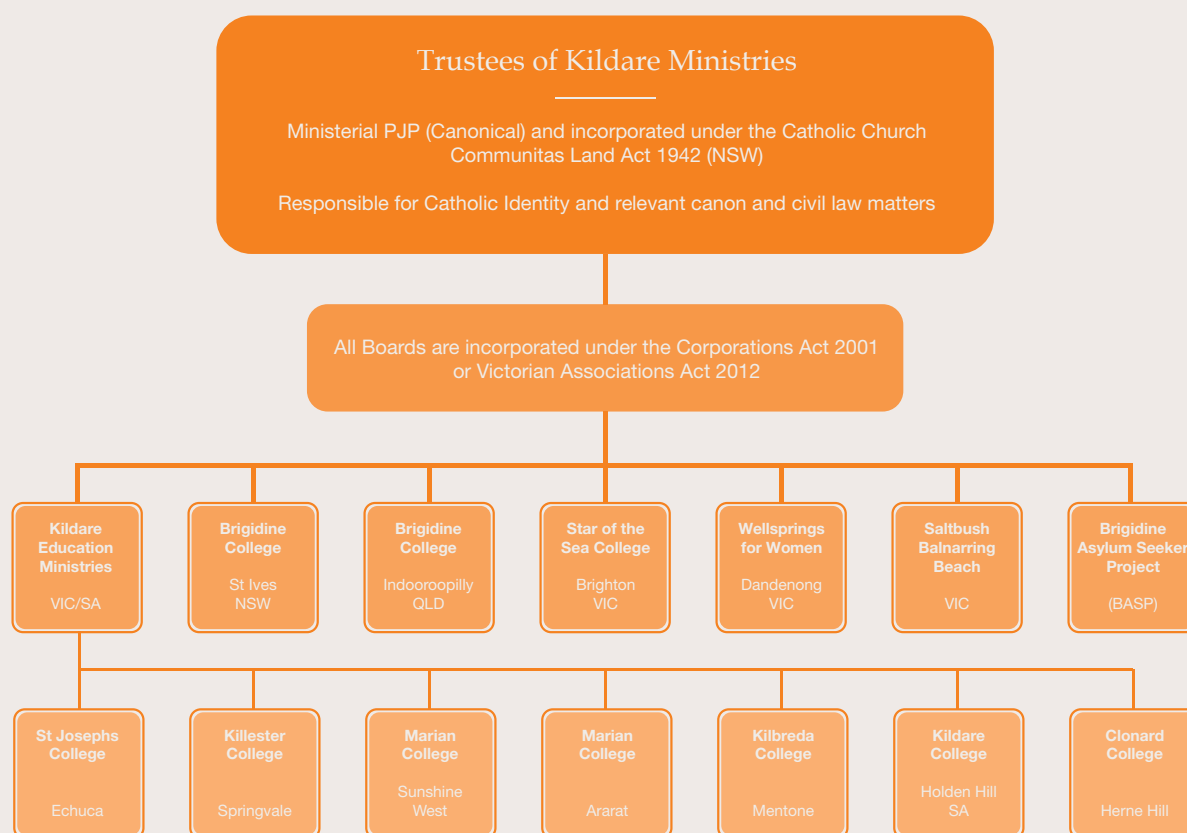
Kildare Ministries encompasses the educational and community services previously governed by the Brigidine Congregation (NSW and Victorian Provinces) and the Presentation Congregation of Victoria.

The reporting entity comprises the Trustees of Kildare Ministries, the Mission and Ministry Team, and the following ten schools and three community service not-for-profit organisations:

• Brigidine College, <i>Indooroopilly, QLD</i> • Brigidine College, <i>St Ives, NSW</i> • Clonard College, <i>Herne Hill, VIC</i> • Kilbreda College, <i>Mentone, VIC</i> • Kildare College, <i>Holden Hill, SA</i> • Killester College, <i>Springvale, VIC</i> • Marian College, <i>Ararat, VIC</i>	• Marian College, <i>Sunshine West, VIC</i> • Star of the Sea College, <i>Brighton, VIC</i> • St Joseph’s College, <i>Echuca, VIC</i> • Saltbush, <i>Balnarring Beach, VIC</i> • Brigidine Asylum Seeker Project, <i>Albert Park, VIC</i> • Wellsprings for Women, <i>Dandenong, VIC</i>

Section Two: Structure, Operations, & Supply Chain

This section outlines Kildare Ministries' structure, operations and identified supply chains as required by Section 16(1)(b) of the Modern Slavery Act 2018.



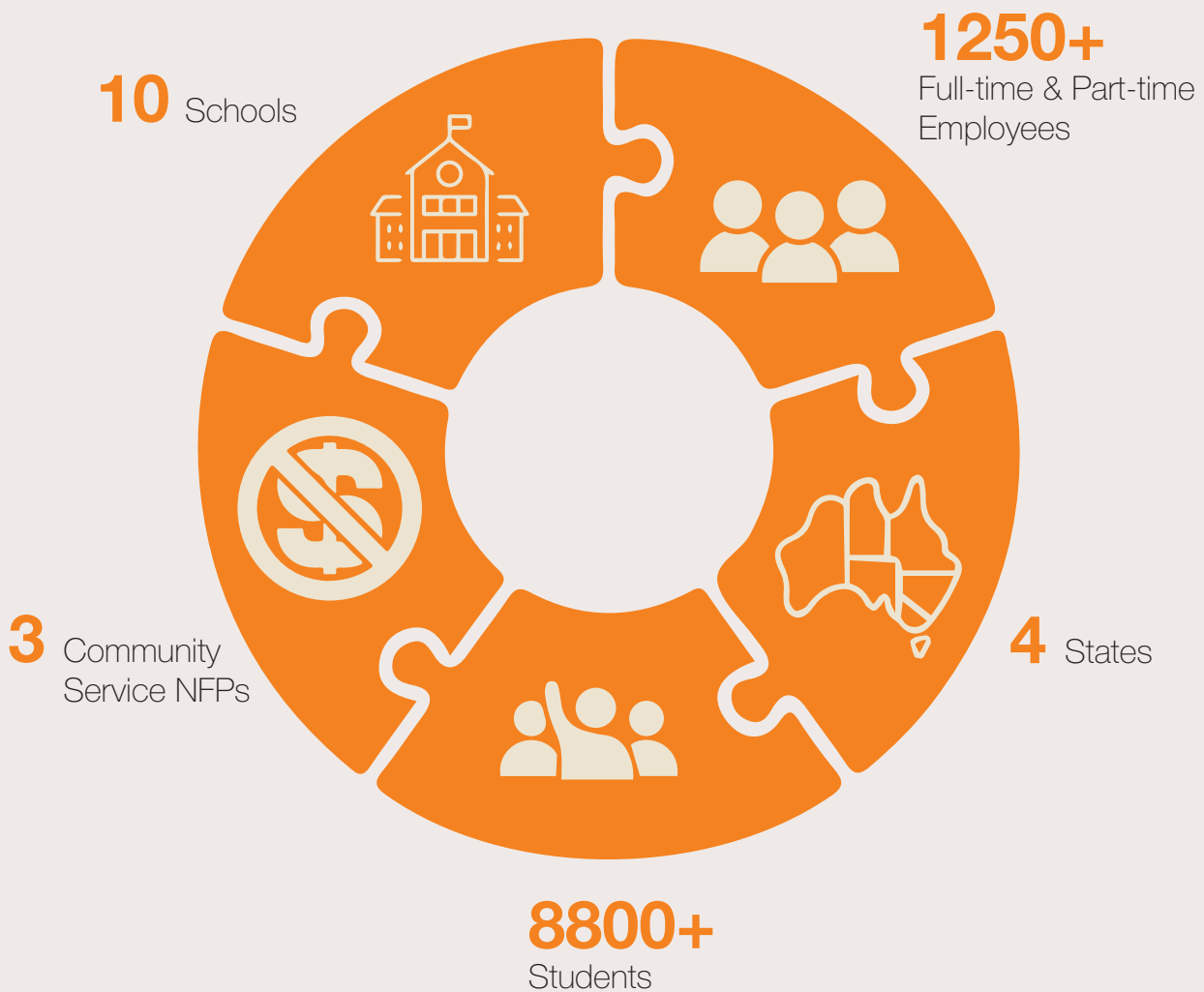
Kildare Ministries operates as a Public Juridic Person (PJP), established by decree of the Holy See.

Our mission is grounded in Catholic Social Teaching and guided by our Living Justice, Living Peace Charter, which calls us to uphold the dignity of every person and respond actively to injustice.

The Vision, Mission and Values of Kildare Ministries reflect this commitment. We seek to nurture communities that cherish human dignity, promote the common good of all creation, and cultivate insight, courage and compassion in responding to the challenges of our world.

Across our ministries, there is a shared conviction that addressing modern slavery is an essential expression of this commitment to justice and to the principles of Catholic Social Teaching.

Governance oversight is exercised by the Trustees of Kildare Ministries, supported by incorporated Boards and Executive leadership.



Supply Chains

Our operations are entirely Australia-based. The majority of procurement occurs through tier-one domestic suppliers, with ministries independently managing purchasing within central policy frameworks.

Supplier categories include:

- Facilities management and cleaning
- Construction and maintenance services
- ICT and electronics
- Education supplies
- Uniforms and textiles
- Transport and logistics
- Security services
- Professional services
- Labour hire

Suppliers operate across sectors including manufacturing, retail, utilities, agriculture, finance, transport, and administration.

Section Three:

Risk of Slavery in Our Operations & Supply Chain

Section 16(1)(c) of the Modern Slavery Act 2018 requires modern slavery statements to describe the modern slavery risks in operations and supply chains of the reporting entity. This section outlines the key modern slavery risk areas in Kildare Ministries' operations and supply chains.

Risk of Modern Slavery Practices

Modern slavery refers to serious forms of exploitation, including forced labour, trafficking, servitude, debt bondage, forced marriage, and the worst forms of child labour.

According to the International Labour Organization (ILO) and Walk Free Global Estimates (2022), approximately 50 million people are living in modern slavery globally.

Kildare Ministries recognises that it may be directly linked to modern slavery risks through the procurement of goods and services from suppliers operating in higher-risk sectors and regions. While we do not consider that our operations cause or contribute directly to modern slavery practices, we acknowledge that our purchasing decisions may be linked to risks deeper within supply chains, particularly where there is limited visibility beyond tier-one suppliers.

Operational Risk

Kildare Ministries has assessed residual modern slavery risk within its direct operations as **low**.

Risk controls include:

- Direct workforce engagement
- EBA-aligned wages and entitlements
- Union representation
- Human resources governance frameworks
- Safeguarding and whistleblower mechanisms

No systemic indicators of forced labour or exploitative employment practices were identified during the reporting period.

Supply Chain Risk

Supply chain exposure presents a higher inherent risk due to:

- Multi-tier procurement
- International manufacturing inputs
- Sector-specific labour vulnerabilities

High-risk sectors identified include:

- Cleaning and facilities services
- Construction
- Labour hire
- Security services
- Textile manufacturing
- Electronics production

Geographic Risk

Certain countries or regions where our suppliers operate, along with some of the goods they produce and source, are considered high-risk due to the potential association with modern slavery practices, including forced labour, human trafficking, child labour, and debt bondage.

Higher-risk sourcing regions include:

- China**
Electronics, garments, textiles, toys
- India**
Garments, sporting goods
- Vietnam**
Furniture, textiles
- Malaysia**
Rubber products



Risks include forced labour, child labour, trafficking, and debt bondage.

Domestic risks were also identified in contracted services such as cleaning, labour hire, and security.

Section Four: Action

Section 16(1)(d) of the Modern Slavery Act 2018 requires modern slavery statements to describe the action taken. This section outlines the action taken by Kildare Ministries to assess and address risks, including due diligence and remediation processes.

Kildare Ministries' values are prioritised in all aspects of our work, and our commitment to responsible practice extends to our procurement processes, where we set clear expectations for our suppliers.

The supplier code of conduct outlines our minimum standards and non-negotiable requirements regarding human rights and labour practices. We understand that human rights due diligence is an ongoing process and is most effective when it is embedded in the risk and procurement processes of each of our ministries.

Kildare Ministries applies a risk-based due diligence framework aligned to:

- UN Guiding Principles on Business and Human Rights
- Australian Government Modern Slavery Reporting Guidance
- Catholic ethical procurement principles

A key focus during 2025 was strengthening our approach to supplier risk assessment. During 2025, Kildare Ministries expanded its partnership with iPRO to systematise supply chain risk assessment. Using the iPRO Modern Slavery Assessment Tool:

- 574 suppliers were assessed
- Suppliers completed self-assessment questionnaires
- Risk scores were generated across inherent and control dimensions

Risk categories included:

- High risk – inherent exposure
- High risk – inadequate controls
- Medium risk – partial controls
- Low risk – adequate controls
- Low risk – minimal exposure

Kildare Ministries also completed a self-assessment of its own operations.

Supplier Due Diligence

Our due diligence framework includes:

- Supplier Code of Conduct enforcement
- Onboarding risk screening
- Contractual compliance clauses
- Documentation requests via iPRO
- Annual reassessment requirements

The modern slavery assessment is now embedded into procurement onboarding processes.

Risk Mitigation & Supplier Engagement

Post-assessment engagement focused on:

- Policy uplift (labour rights, grievance mechanisms)
- Ethical sourcing commitments
- Workforce due diligence
- Supply chain mapping improvements

Suppliers identified as higher risk received targeted follow-up and corrective action guidance.

Remediation Framework

Kildare Ministries is committed to safeguarding children and adults at risk, fostering a safe and inclusive environment for all. We maintain a victim-centred remediation approach.

Actions include:

- Escalation pathways to law enforcement
- Collaboration with specialist NGOs
- Survivor-informed response principles
- Safeguarding frameworks for students and vulnerable persons

Operational interventions during the period included collaboration with:

- Australian Federal Police (AFP)
- Refugee Education Support Program
- Foundation House
- Centre for Multicultural Youth

While no systemic cases of modern slavery were identified within our operations, Kildare Ministries responded to situations involving heightened vulnerability, including risks related to forced marriage, trafficking vulnerability, and suspected domestic servitude cases. These responses were managed through a victim-centred approach, in collaboration with specialist organisations, ensuring that the safety and wellbeing of individuals remained the primary focus.

Education & Prevention Initiatives

Preventative action remains a core pillar of the Kildare Ministries response. Key initiatives included:

- Human trafficking working groups
- Student justice programs
- Social justice retreats
- Advocacy education forums
- iPro workshop with Business Managers

Our Community Works, including BASP and Wellsprings for Women, continue to play a frontline role in education, advocacy and direct support for vulnerable communities.

Section Five:

Effectiveness

Section 16(1)(e) of the Modern Slavery Act 2018 requires modern slavery statements to describe how the reporting entity assesses effectiveness of its actions.

Kildare Ministries assesses the effectiveness of its actions to address modern slavery risks through a combination of quantitative metrics, qualitative insights, and continuous improvement measures.

Since 2023, we have utilised the benchmarking and key performance indicators provided by the iPRO Modern Slavery Assessment Tool to evaluate both supplier performance and our own organisational response.

Monitoring and Measurement

Using the iPRO platform, Kildare Ministries monitors:

- Operational risk scores
- Aggregated supply chain risk scores
- Supplier participation and engagement rates
- Policy and control maturity across suppliers

Current Results

Operational Risk Scores:

- Inherent Risk Score: 50.00 / 100
- Unmitigated Risk Score: 24.72 / 100

Aggregated Supply Chain Scores:

- 299 of 574 suppliers (52.1%) completed the assessment
- Inherent Risk Score: 33.06 / 100
- Unmitigated Risk Score: 36.32 / 100

Assessment of Effectiveness

These results indicate that while overall inherent risk exposure remains moderate, existing controls are contributing to a reduction in unmitigated risk across our operations. The supplier participation rate demonstrates meaningful engagement, while also highlighting the need to further strengthen supplier responsiveness and accountability.

Engagement with higher-risk suppliers has resulted in improved policy development, increased awareness of labour rights obligations, and greater transparency in supply chain practices.

Continuous Improvement

Kildare Ministries recognises that assessing effectiveness is an ongoing process. In the next reporting period, we will strengthen our approach by:

- Increasing supplier assessment completion rates
- Expanding reassessment of higher-risk suppliers
- Tracking improvements in supplier control scores over time
- Further embedding modern slavery risk considerations into procurement decision-making

These measures will support a more robust evaluation of whether our actions are effectively reducing modern slavery risks over time.

Section Six:

Consultation

Section 16(1)(f) of the Modern Slavery Act 2018 requires reporting entities to describe the process of consultation with any entities that the reporting entity owns or controls

Consultation occurred with controlled entities and ministry stakeholders, including:

- School Business Managers
- Risk and Compliance Leads
- Religious Education and Justice Leaders
- Community Works Leaders

External consultation partners included:

- ACRATH
- Australian Federal Police
- Foundation House
- Centre for Multicultural Youth

All schools participated in the supplier assessment and engagement program, and insights from this process will continue to inform our priorities and actions.

Section Seven:

Other Relevant Information

Kildare Ministries recognises that modern slavery risks intersect with broader human rights issues, including gender inequality, migration vulnerability, and economic exclusion.

Through our ministries, we integrate justice education, ethical procurement, and community outreach to address root causes of exploitation.

Kildare Ministries is committed to continuously strengthening its response to modern slavery. In the next reporting period, we will prioritise:

- Increasing visibility beyond tier-one suppliers
- Deepening supplier engagement in high-risk categories
- Strengthening staff capability through targeted training and awareness
- Enhancing integration of modern slavery risk into procurement and governance frameworks
- Expanding collaboration with sector partners and expert organisations

Through these actions, we aim to build a more transparent, accountable, and ethical supply chain.

This joint Modern Slavery Statement is made for the financial year ended 31 December 2025 by Trustees of Kildare Ministries on behalf of the group entities which are reporting entities according to the definition of the Act. The reporting entities under the Act are:

- Trustees of Kildare Ministries
- Kildare Education Ministries Ltd

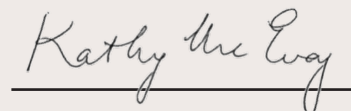
The Trustees of Kildare Ministries, as the principal governing body that directly controls each reporting entity, approved this Modern Slavery Statement in accordance with section 13 of the *Modern Slavery Act 2018 (Cth)*.

This statement is signed by Rosemary Copeland and Kathy McEvoy in their roles as Co-Chairs of the Trustees of Kildare Ministries.



Rosemary Copeland

Co-Chair



Kathy McEvoy

Co-Chair



Kildare
MINISTRIES

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