

# Modern Slavery Statement 2025

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## 1. Submission information

### 1.1 Reporting Entity

The reporting entity is Churches of Christ Community Care trading as Fresh Hope Communities (ABN 41 041 851 866) (**Fresh Hope Communities**). Fresh Hope Communities is part of Churches of Christ in NSW, an unincorporated association established by a Constitution.

This Statement covers the activities of Fresh Hope Communities and has been prepared in accordance with the requirements of the Modern Slavery Act 2018 (Cth).

### 1.2 Approval

This Statement for Fresh Hope Communities was approved by the Board of Fresh Hope Communities on 17 December 2025.



**Stephen Smith**

Fresh Hope Communities' Board Chair

## 2. Structure, Operations and Supply Chains

### 2.1 Background

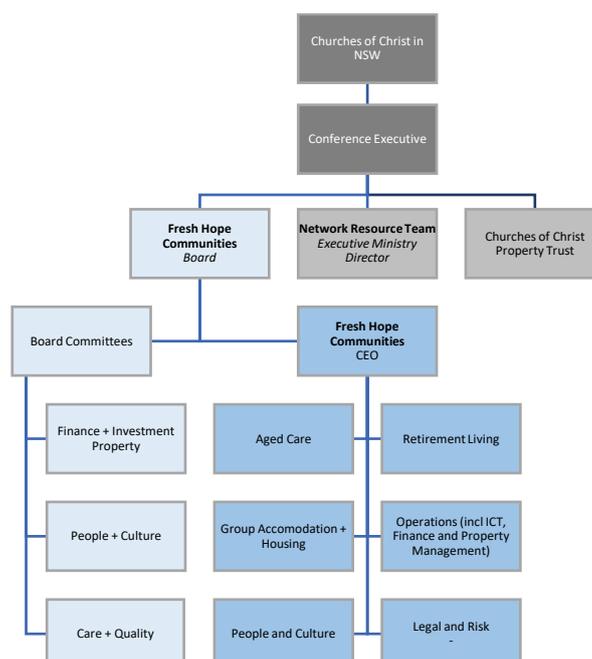
Fresh Hope Committees is a Public Benevolent Institution, a Type 1 Tax Deductible Recipient, and a registered charity with the Australian Charities and Not-for-profit Commission (ACNC).

In its early years, Fresh Hope Communities (then Churches of Christ Community Care) was established to identify needs within the local community and to respond to those needs by building orphanages for children who were estranged from their parents and homes for widows and single women. The sole purpose of the organisation was to build community and to show care.

By [year], Churches of Christ Community Care had evolved into an organisation that provided a broader range of services reflecting the changing needs of the community. Rebranded 'Fresh Hope Communities, the organisation is focused on providing:

- community services within the aged care, welfare and community sectors;
- community housing services;
- care for the frail, ageing, disadvantaged and poor with passion, dignity and respect.

### 2.2 Organisation structure



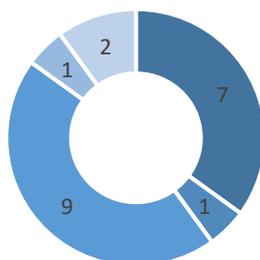
## 2.3 Snapshot of Operations

### Services

Fresh Hope Communities operates:

- nine independent-living retirement communities
- seven residential aged care facilities
- one social service facility offering respite care
- two outdoor experience and group accommodation centres
- one affordable housing complex.

### Fresh Hope Communities - Services



### Staffing

Fresh Hope Communities currently employs approximately 1,183 people across its various locations.

Each year, these staff:

- provide care to approximately 600 residents in residential aged care services
- support over 250 residents in retirement communities
- welcome approximately 45,000 guests at outdoor experience and group accommodation centres.

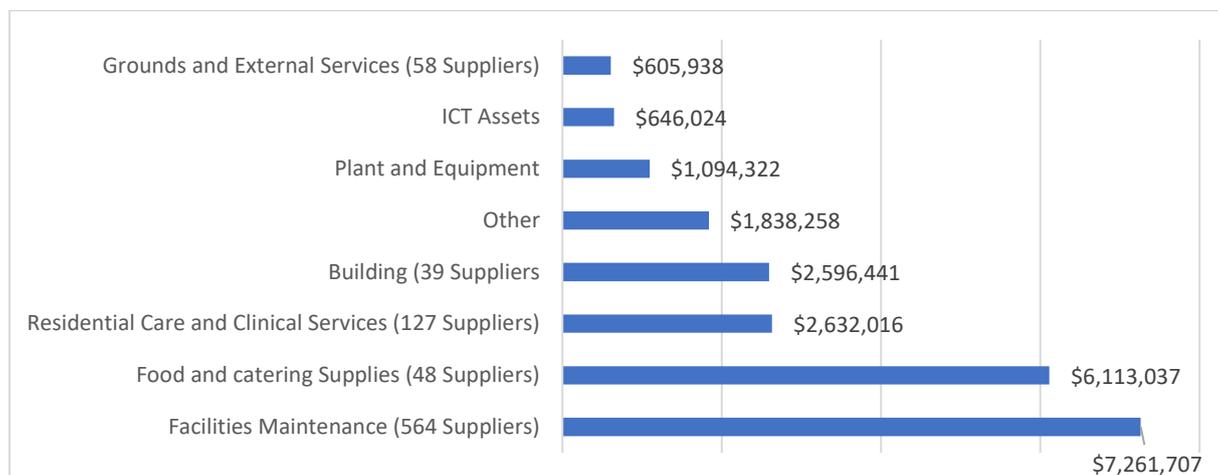
### Locations

Support Services	Rhodes Office	Rhodes
Residential Care	Alexander Campbell House	Forestville
	Ashwood Residential Care Service	Pendle Hill
	Borella House	Albury
	Clelland Lodge	North Nowra
	Coffs Haven Residential Care Service	North Boambee Valley
	Green Hills Residential Care Service	East Maitland
Social Support	Magnolia House	North Nowra
Retirement Living	The Residences	Castle Cove
	Cedar on Collins	Kiama
	Henley Brae Retirement Community	Mittagong
	Green Hills Retirement Community	East Maitland
	Forestville Retirement Community	Forestville
	Highfield Court Retirement Community	Mayfield
	Pendle Hill Retirement Community	Pendle Hill
	Dalpura Retirement Community	Coffs Harbour
	Tasman Court Retirement Community	Thirroul
Group Accommodation	The Tops	Stanwell Tops
	Greenstead Valley	Greenstead Valley
	Tiny Homes	Joadja
Affordable Housing	Nightingale Marrickville	Marrickville

## 2.4 Supplier Relationships

Fresh Hope Communities' supply chain is primarily in NSW and includes a wide range of goods and services including services related to property maintenance and development, food and consumables, furniture and equipment, professional services, allied health, agency, labour and cleaning services, IT, fleet, utilities, and waste services.

In the 12 months to July 2025, Fresh Hope Communities' total expenditure was over \$26 million to support operational requirements. Following is a breakdown of expenditure by supplier category and numbers of supplier.



## 3. Risks of Modern Slavery Practices in Current Operations and Supply Chains

Fresh Hope Communities' Risk Management Framework adopts an organisation-wide approach to risk management. This framework is formulated to detect, assess, and respond to a variety of potential issues, including risks associated with Modern Slavery.

The particular areas that present potential Modern Slavery risks for Fresh Hope Communities are:

- **Operations** – there is a potential risk of labour exploitation within our organisation
- **Supply chain** - there is a potential risk that Modern Slavery is present in the supply chain that provides our goods and services.

### 3.1 Operations Risk

There is a risk Fresh Hope Communities contributes to modern slavery, deceptive recruitment practices and debt bondage, through the utilisation of labour hire services.

#### a. Labour hire and use of agency staff

Fresh Hope Communities recognises that the highest risk of modern slavery in labour force will occur through workers contracted through labour agencies. The COVID-pandemic and associated workforce challenges have exacerbated the need to rely on labour agencies to fill recruitment gaps. Fresh Hope Communities will continue to focus on mitigating these risks, including through our efforts to increase the attraction and retention of staff and enhances rostering capabilities.

### 3.2 Supply Chain Risk

Fresh Hope Communities has identified the following potential areas of higher risk in its supply chain:

- a. **Medical equipment.** *There is a risk that in acquiring medical products for use in the provision of services, Fresh Hope Communities contributes to modern slavery through overseas supply chains.*

Medical products, including equipment such as Personal Protective Equipment, are frequently manufactured in nations where modern slavery practices are more prevalent. Global demand and manufacturing of personal protective equipment was heightened during the COVID-19 pandemic. Rubber products, like gloves, represent a particular risk, as rubber is harvested in countries with recorded incidents of worker subjugation to modern slavery. Consequently, there exists a possibility that Fresh Hope Communities might inadvertently support such unethical practices through the acquisition of these products.

- b. **Food and catering supplies.** *There is a risk that Fresh Hope Communities might indirectly contribute to modern slavery practices through the procurement of food in the delivery of its services.*

Supply chains for both locally-produced and food items sourced from overseas may have higher risks of being associated with modern slavery practices, for instance due to the nature of employment in the industry which is typically characterised by low-skilled, low-paid, manual labour, along with a high prevalence of short-term, seasonal, and migrant workers, as well as the use of subcontractors.

- c. **Outsourced services – cleaning and laundry.** *There is a risk that by outsourcing some services, Fresh Hope Communities contributes to modern slavery in the form of labour exploitation (such as wage theft and debt bondage).*

Some outsourced services (such as cleaning and laundry) involve the engagement of low-skilled, low-paid manual labour. A significant number of workers in the cleaning and laundry industries are migrant or student workers, some of whom may have limited literacy and/or language skills, increasing the risk of exploitation. There is a possibility that through engagements with suppliers in sectors such as cleaning and laundry, Fresh Hope Communities could inadvertently facilitate practices of modern slavery.

- d. **ICT hardware.** *There is a risk in acquiring ICT hardware Fresh Hope Communities contributes to modern slavery through overseas supply chains.*

Information and Communication Technology (ICT) hardware is often sourced from regions where modern slavery is more prevalent. There is a possibility that Fresh Hope Communities could inadvertently facilitate practices of modern slavery through the acquisition of ICT devices (such as computers and mobile phones).

## 4. Actions taken to control risks

Fresh Hope Communities has begun the work to identify and address modern slavery risks. That work is in its early stages and includes taking steps to implement the following:

### 4.1 Current actions

- **Policy and Governance:** a Modern Slavery Policy has been approved by the Board and is being implemented and compliance monitored by the Legal and Risk team.
- **Contractual terms and conditions:** Fresh Hope Communities includes provisions in its standard terms and conditions with third parties to seek to minimise risks of modern slavery in third party arrangements. Those terms and conditions include obligations to:
  - not offer, give or accept any bribes or other improper payments or advantages to or from anyone;
  - not cause or facilitate forced labour, trafficking, slavery or exploitation of any kind;
  - have procedures to prevent bribery, corruption, forced labour, trafficking and other forms of exploitation in your operations and supply chain;
  - provide regular training to your personnel on anti-bribery, anti-corruption and preventing modern slavery; and
  - notify us immediately upon becoming aware of any breach or suspected breach of this clause.

### 4.2 Opportunities for future action

- **Procurement:** Over the next 12 months, Fresh Hope Communities will enhance its procurement framework that will see the further development of category management strategies and assessment of modern slavery risk within those categories. The procurement team, as a central function, will manage and execute strategic procurement activities that will incorporate the assessment and mitigation of modern slavery risk assessments during the development of strategic sourcing activities and as part of supplier evaluation procedures at selection and contract renewal and ongoing relationship management practices.
- **Risk assessments:** Modern slavery risk assessments will be conducted for key suppliers as part of the supplier evaluation procedures prior to selection and at contract renewal.
- **Internal consultation and building awareness:** Fresh Hope Communities will be taken to raise awareness of the Modern Slavery Policy and the related procedures particularly relating to procurement activities and engagement with suppliers.

- **Supplier engagement:** Fresh Hope Communities will explore the implementation of a Supplier Code of Conduct to raise awareness and compliance in our supply chains.

## **5. Assessment of Effectiveness of Actions**

Fresh Hope Communities is in the early stages of building the systems and processes to monitor and assess compliance.

External assessments that were conducted in the reporting period provided information about gaps to be addressed, as well as useful benchmarking information for future action. Those assessments included an independent review of payroll functions and outcomes, and the annual financial audit.

Fresh Hope Communities recognises its obligation to take a 'continuous improvement' approach to compliance and will focus on demonstrate progress over time and improving the quality of its reporting.

## **6. Consultation**

In preparing this modern slavery statement Fresh Hope Communities consulted its Executive Leaders, relevant Senior Leaders, and members of its Board. This included consulting with:

- Chief Information Officer
- Chief Legal and Risk Officer
- Chief of People and Culture
- Chief Operations Officer
- General Manager Group Housing and Accommodation
- General Manager Residential Care (Acting)
- General Manager Retirement Living
- Head of Organisational Capability
- Head of Property Services and Asset Management
- Procurement Manager
- Risk Manager