

Modern Slavery Act Statement

Financial Year Ending 30 June 2022



Anglican Community Services

This statement, pursuant to the *Modern Slavery Act 2018* (Cth), sets out the actions taken by Anglican Community Services (referred to as "ACS", "us", "we" or "our") to address modern slavery and human trafficking risks in our business and supply chain for the financial year ending 30 June 2022 (FY22).1

Our values of Integrity, Justice, Compassion and Excellence are fundamental to all our operations and activities. In our relationships with suppliers, and with those involved at all levels in the supply chain, we strive to be honest and transparent and to uphold the right to fairness and dignity for all people. See www.anglicare.org.au/about-us/suppliers/. The Global Estimates of Modern Slavery (2022)² indicate that there are 50 million people in situations of modern slavery. Forced labour accounts for 27.6 million of those in modern slavery and is particularly prominent in the private sector. In view of this fact, we prioritise actively ensuring our staff and supply chains are not involved in modern slavery practices.

In 2022, we utilised our questionnaire process to determine our suppliers' modern slavery risk profiles. We then engaged in further due diligence with any of our suppliers assessed as higher risk via the questionnaire by ensuring they had implemented policies and procedures to minimise the risk of modern slavery in their business enterprises. We also raised awareness of modern slavery within our business by communicating our commitment to assessing and addressing modern slavery risks and distributing a short video to highlight slavery in supply chains. In addition, we required all of our full-time staff within Anglicare who procure high value contracts to undertake training on modern slavery risks in supply chains.

'The senior leadership of ACS are deeply committed to ongoing action to assess and address modern slavery risks. Recognising that most cases of forced labour are found in the private sector and disproportionately affect migrant workers, ACS will continue to employ measures to combat forced labour and trafficking in business supply chains, promote fair and ethical recruitment, and provide greater support for individuals who are particularly vulnerable to risks of modern slavery.' - Greg Hammond OAM, Chairman, Anglican Community Services

This statement was approved by the Board of ACS on 14 November 2022.

Signed.

Greg Hammond OAM Chairman, Anglican Community Services 14 November 2022

- 1. Anglican Community Services, trading as Anglicare, is an incorporated entity independent from any other 'Anglicare' or entity associated with the 'Anglicare' name.
- 2. Global Estimates of Modern Slavery: Forced Labour and Forced Marriage, International Labour Organisation, Walk Free and International Organisation for Migration (2022).

I. About us

ACS exists to serve people in need in our community, enrich lives and share the love of Jesus. We offer life-enriching care and compassion for each person, meeting material, physical, emotional, social and spiritual needs. We provide a range of services that promote dignity, safety, participation and wellbeing for people in their relationships, homes and communities.

As a public benevolent institution, our objectives are to further the work of the Anglican Church Diocese of Sydney by promoting and proclaiming the gospel of the Lord Jesus Christ while undertaking works of public benevolence that reflect the love of God as shown in Christ.

Organisational structure

ACS, trading as 'Anglicare', is a body corporate incorporated under the powers given to the Synod of the Anglican Church Diocese of Sydney by an Act of NSW Parliament, now known as the *Anglican Church of Australia (Bodies Corporate) Act 1938.*

On 1 July 2016, Anglicare Sydney (also known as Sydney Anglican Home Mission Society Council) and Anglican Retirement Villages ("**ARV**") officially merged to become 'Anglican Community Services'. Anglicare does not own or control any entities.

ACS is a charity registered with the Australian Charities and Not-for-profits Commission and our head office is located at Level 2, 62 Norwest Boulevard, Baulkham Hills, NSW 2153. ACS has a geographical coverage that includes greater Sydney, Illawarra Shoalhaven, Northern Inland and the Norfolk Island regions of New South Wales.

Operations

Our operations are entirely based in Australia and comprise nine business units: Community, Corporate Services, Finance, Mission & Partnership, Operational Support, Property, Residential Aged Care, Retirement Living and Customer Experience.

Our operations include:

- the provision of retirement living (retirement villages);
- the provision of residential aged care;
- the provision of home care services to older people living in their own homes within the wider community;
- the provision of accommodation to older people at risk of homelessness (or already homeless);
- the provision of a range of nursing and paramedical support services to older people; and
- the provision of a wide range of community support services, including mental health and care support, family and relationships services, out of home care, sustainable living support services, advocacy and social research, disaster recovery services, chaplaincy and pastoral care.







Family, Parenting and Youth Support



Property

Housing.

In FY22, our total procurement spend was

approximately \$200 million on goods and

management comprise a substantial component of our operations based on the

annual procurement spend across the

organisation (approximately \$59 million

and \$32.7 million respectively). Our property team manage all developments

related to Retirement Living, Residential

Aged Care and Social and Affordable

Property management tenders are issued

to approved suppliers directly by the

Facility Manager or Project Manager. For

property development, ACS' design and

contractors appoint the lead design and

architectural organisations via tender, who

then appoint sub-contractors to support the development project. All procurement

responsibility (for building materials and

services used on site) is assigned to the

lead contractor and sub-contractors of the

construction group



services to support our operations.

Property development and



More Aged Care

Services

Food and Financial Assistance

property

external



Services

Foster Care and

Adoption Services

000

Residential

Aged Care



Support for Carers

Counselling

external construction company. Our contractual arrangements with these contractors include a targeted modern slavery clause, explicitly taking modern slavery considerations into account.

Staff

ACS employs 4,254 people. The following table shows their employment status and demographic make-up:

823	Male
101	Fomol

- 3431 Female
- 2258 Permanent Part-time
- 1058 Permanent Full-time
- 764 Casual 545 Volunteers
- Born overseas & are Australian Citizens 1145
- 1514 Born overseas & are not Australian Citizens
- SCHADS* Award 147
- 3886 ACS Agreement

*SCHADS: Community employees receiving the Social, Community, Home Care & Disability Services Award.

Our employees perform a range of roles including:

- care, health and lifestyle;
- · operations and hospitality; and
- corporate and administration.

More than half of our workforce perform the following types of roles:

- Carer / care worker;
- Registered nurse and nursing assistant:
- Servery staff;
- Lifestyle worker / lifestyle carer;
- Laundry staff; and
- Administration assistant.

ACS employees also include trainers, support workers, managers, coordinators, physiotherapists, personnel, cleaners. maintenance gardeners, drivers, counsellors. chaplains, case workers and cooks.

However, cleaning and maintenance is predominately outsourced for most of our sites, with one contractor appointed to service the cleaning needs across our

The top categories of spend in FY2022* are shown below:

117 suppliers top category spend

1.	Property Development	\$59,213,051
2.	Property Maintenance (PM) total	\$32,722,724
	PM – Renovations	\$14,426,026
	PM – Cleaning	\$8,273,005
	PM – Property Services	\$3,980,234
	PM – Plumbing	\$1,632,224
	PM – Air Conditioning	\$1,546,771
	PM – Electrical	\$1,147,057
	PM – Fire Services	\$804,341
	PM – Landscaping	\$678,035
	PM – Locksmith Services	\$235,031
3.	Staffing	\$23,506,000
4.	Insurance	\$13,672,615
5.	Medical Supplies	\$9,820,384
6.	Other 1	\$8,502,100
7.	Procurement of Fresh Food	\$8,209,796
8.	IT Equipment & Software	\$7,579,717

* The table reflects an indicative spend inclusive of FY22Q2, FY22Q3, FY22Q4 and FY23Q1.

1 Includes non-recurring specialised consultancy services and specialised purchases (items / entertainment).

2 May include a service or material from a one-off supplier.

and

residential aged care, retirement living and offices. Nursing agencies, allied health and property services are also sectors where ACS draws on outsourced workers when required.

The outsourcing of staff is our third largest area of spend after property development and property management — approximately \$23.5 million in FY22.

Supply chain

ACS recognises that our corporate and social responsibilities reside in both our own direct activities and our supply chains and seeks to purchase products and services that are ethically produced. We look for suppliers that demonstrate a commitment to implementing policies and practices consistent with, and complementary to, our own.

9.	Utilities	\$7,079,247
10.	One-Off Spend 2	\$5,460,822
11.	Communication	\$5,020,363
12.	Marketing & Advertising	\$3,949,836
13.	Consultancy Services	\$3,609,973
14.	Kitchen Equipment & Audio Visual	\$2,064,919
15.	Mobility & Aged Care Equipment	\$2,063,143
16.	Motor Vehicle Fleet	\$1,695,899
17.	Waste Removal	\$1,571,434
18.	Furniture	\$1,094,391
19.	Cleaning Chemicals & Equipment	\$732,351
20.	Printing & Stationary	\$573,772
21.	Apparel	\$493,907
22.	Finance	\$397,623
23.	Signage	\$346,027
24.	Postage	\$253,723
25.	Council (water rates etc.)	\$242,287



The above graphic represents the geographic footprint of our third-party suppliers from FY22.

Supplier Geography

The country with the highest number of supplier business operations was Australia, with 110 business operations occurring within the Australian geographic region. This was followed by New Zealand (where 13 business operations were conducted by suppliers), then China (11), United Kingdom (8), United States (8), Japan (7), France (7), and Canada (7).

One global supplier conducts business operations in 65 countries, including countries at high risk of modern slavery, such as Myanmar, Colombia, Nicaragua, and Laos. However, the goods supplied to ACS are produced in low-risk countries (Canada, UK, Australia). Further, this particular supplier indicated to us that it had developed and implemented several policies and procedures to mitigate the risk of modern slavery practices including a Code of Conduct; Anti-Slavery Policy; Anti-Bribery and Corruption Policy; Corporate Social Responsibility Policy; and a Supplier Code. This company has also agreed to comply with ACS' Ethical Purchasing Policy when providing goods and services to us.

2. The risks of modern slavery in our operations and supply chain

In our operations

ACS directly employs workers performing base-skilled roles, temporary labour and migrants. ACS recognises these groups are particularly vulnerable to modern slavery. However, for the reasons set out in our previous Modern Slavery Statements, we maintain the view that the risk of modern slavery in our workforce is low. This is largely due to the strict regulations in the aged care and nursing sectors and employment laws with which ACS is required to comply.

In our supply chain

In line with the United Nations Guiding Principles on Business and Human Rights, we adopted a risk-based approach when assessing the human rights risks in our supply chain in previous years. As all of our direct suppliers are based in Australia, our risk assessment was based on sector risk only. Despite the fact that Australia is considered a low-risk jurisdiction for modern slavery, we recognise that the risk of modern slavery may permeate the second and subsequent tiers of our supply chain.

The online modern slavery questionnaire on the ethiXbase platform was chosen for its ability to inquire about the supply chain of our suppliers, particularly where an Australian business supplies products that originate from other jurisdictions.





The sub-set of suppliers identified through the matrix and spend analysis process were then placed on the ethiXbase platform and were issued a modern slavery questionnaire via email. 117 supplier questionnaires were issued in 2022. We achieved an excellent completion rate of 94.9%, compared to 69% in 2020 and 85% in 2021.

Using the ethiXbase platform, the data provided by our questionnaires showed:

53% of suppliers were Low Risk;

41% of suppliers were Moderate Risk; and

0.9% of suppliers were High Risk.

The results of the questionnaire enabled us to identify risk patterns and the suppliers requiring closer attention. All suppliers (only 1 in FY22) who returned a risk profile of high or the high end of moderate were contacted for further due diligence.

Supplier Risk



Our top suppliers by spend, although based in Australia, may have a higher risk of modern slavery in their supply chain by virtue of their sector risk, as set out in the table below. The risks outlined in this table are general and do not relate to any actual instances of modern slavery in the supply chain of our first tier suppliers.

Sector	Generally known modern s
Cleaning and laundry	The cleaning industry is co due to the nature of the operations. The cleaning s many instances and, as su of this, those who enter populations, with limited un understanding of English. industry who fall into th restricted ability to bargain contract and are vulnerable
Food services	Due to the nature of the w packaging and transport chains have a high risk of concern for supermarket producers, distributors, examples of modern slave frequently cited as areas o contractors who recruit bac vegetable picking on farms bonded labour in food proce
Medical supplies	A large percentage of the produced in China and Ma manufacturing rubber glow workers making them work unsafe conditions, where p fees kept workers in debt l robes, are sourced large increased risks of modern reported that the British factories where hundreds of conditions of modern slaves

3. www.corporate-responsibility.org/clean-hands-dirty-supply-chains/ and www.theguardian.com/global-development/2018/ dec/10/claims-that-nhs-rubber-gloves-made-by-forced-labour-spark-inquiries.

4. www.theguardian.com/global-development/2020/nov/20/uk-sourced-ppe-from-factories-secretly-using-north-korean- slavelabour.

lavery risks

onsidered high risk for modern slavery largely workforce and the often opaque nature of sector does not require tertiary qualification in uch, the workforce is often low-skilled. On top the cleaning sector are often from migrant understanding of their legal rights or a limited As a result, those employed in the cleaning he aforementioned circumstances have a with their employers or those with whom they le to exploitation.

work involved in the production, processing, of food and produce, food related supply modern slavery. These risks are not only a ets and suppliers generally; they impact packers, exporters and caterers. Some ery risks in the food services industry that are of concern are the engagement of labour hire ckpackers and seasonal workers for fruit and s and poor conditions, passport retention and cessing.

world's personal protective equipment (**PPE**) is alaysia. Some factories have been reported to be ves and other rubber products using migrant excessive overtime of up to 160 hours a week in passports were confiscated, and high recruitment bondage.² Other items of PPE, such as medical ely from factories in China where there are slavery. For example, in November 2020, it was government sourced PPE for the NHS from of North Korean women were secretly working in ery.³

Sector	Generally known modern slavery risks ³
Property maintenance	The prevalence of subcontracting in the property maintenance industry can lead to contractual liabilities and obligations diminishing to the point where the human rights of workers on site may go unnoticed through lack of transparency.
IT equipment and software	IT companies with the necessary materials to produce electronic goods, and parts of those goods, present a risk. For example, cobalt is an essential component of rechargeable lithium-ion batteries. More than half of the world's cobalt is mined by the Democratic Republic of Congo, where, according to UNICEF, approximately 40,000 miners are children. Another problematic material sourced for IT equipment is mica. India produces 60% of the globe's mica. The most prevalent areas of mica production are in Jharkhand and Bihar, where a third of the population live below the poverty line.
Property development	In the property development industry, the prevalence of opaque subcontracting arrangements and frequent use of labour hire companies increase the risks of modern slavery. Additionally, the industry often relies on low-skilled workers, who may also be migrants with low levels of English. The use of building materials such as concrete, timber, steel, quarried stone products, glass, construction films, textiles and other goods all carry inherent modern slavery risks. Producers of these items often operate in high-risk locations. For example, forced labour and child labour have been found in brick kilns in countries such as India, Pakistan, Bangladesh and Cambodia.

Impact of COVID-19

PPE

In our first Modern Slavery Act Statement in 2020, we described the significant impact of the pandemic on our supply chain of PPE. Our tier 1 suppliers for medical supplies and PPE were unable to service all of our supply needs due to the supply shortages experienced nationally and globally.

In 2021, we were able to source our required PPE stock as a result of supply chains for PPE stabilising and broadening our supply channels so that we did not depend on a single source for supply. In FY2022, ACS held higher inventories of PPE as supply chains remained stable.

We recognise that the global demand for the production of more PPE at the beginning of the pandemic contributed to an increase in forced labour around the globe. ACS' risk assessment process for the procurement of PPE specifically includes considerations of modern slavery risk in our contractual arrangements with suppliers. In addition to completing the ethiXbase questionnaire, it is critical to ACS' tendering and contracting process that our PPE suppliers adhere to our supplier policies and codes embedding human rights. Adherence to our Ethical Purchasing Policy is a cornerstone on which Tier One supplier selection is based.

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3. Actions taken to assess and address the risks, including due diligence and remediation processes

Our foundational policies and procedures relating to procurement, such as our Ethical Purchasing Policy (Policy), embed human rights considerations into our purchasing decision-making. New suppliers tendering for ACS works or suppliers currently supplying goods and services to ACS must certify their compliance with our Supplier Code of Practice (Code). The Code outlines 12 general principles which we believe our suppliers should comply with in order to minimise slavery or human trafficking in their workplaces or supply chains. Suppliers required to report pursuant to the Modern Slavery Act 2018 (Cth) must also certify their compliance with the legislation. The Policy and Code are available here: www.anglicare.org.au/about-us/suppliers/ .

Our online modern slavery questionnaire was used to assess the modern slavery risk profile of a sub-set of our major suppliers. The risk ratings were used to inform our supplier engagement process for FY22. We communicated with suppliers identified as requiring further engagement based on the results of the questionnaire. During the course of FY22 we engaged further with one supplier based on the higher risk profile which was driven by the industry and geographic region in which they conduct business operations. A snapshot of the outcome and progress regarding this supplier is described below:

Supplier industry and reason for further engagement	Outcome/progress
The global technology and service company provides professional-ware washing systems, washer disinfectors, and food waste disposal technology manufactured in China. ACS engaged in further discussion based on the modern slavery risks associated with manufacturing location and the general industry. Further, the questionnaire revealed that migrant workers form part of the company's workforce – a category of workers vulnerable to modern slavery.	 ACS sought assurance that the supplier had implemented the following policies and procedures: Code of Conduct Conflicts of Interest Policy Corporate Social Responsibility Policy Diversity & Inclusion Policy Emergency Response Policy Employee Handbook Health, Safety & Security Policy Grievance/ Whistleblower Mechanism Gifts & Entertainment Policy Environmental/ Hazardous Materials Policy Anti-Bribery and Corruption Policy ACS verified that the supplier had signed and agreed to ACS' Ethical Purchasing Policy and certified their compliance with the 12 principles enshrined in our Code. The supplier agreed to notify us without delay in the event of an actual or suspected breach.
	Due to the competitive nature of the industry and the proprietary nature of their manufacturing processes, independent on-site audits are limited, unless they are conducted by long standing and trusted customers. ACS does have audit rights and can request information in accordance with the Policy.

We recognise that human rights due diligence needs to be ongoing. Accordingly, our approach is to maintain open dialogue with our suppliers to monitor their actions taken to improve their capacity to assess and address modern slavery risks in their operations and supply chain.

Our approach to ethical purchasing, reflected in our policies and our first Modern Slavery Act Statement, are published on our website www.anglicare.org.au/about-us/suppliers/.

In relation to our operations, we:

- communicated our commitment to eradicating modern slavery with our employees by awareness of modern slavery in supply chains;
- provided modern slavery awareness training for key staff who have responsibilities for flags, the legal framework and our reporting obligations; and
- continued to monitor the reports made pursuant to our Whistleblower Policy for issues slavery during FY22.

Actions Taken for ACS Employees

ACS ensures its own employees are not working under conditions of slavery by insisting that employment contracts are signed prior to commencement of employment. ACS' Employment Contracts include extensive detail regarding minimum wages, hours of work, breaks, leave, holidays, consultation and dispute resolution, national employment standards, agreement flexibility, workload management, and training.

Employees are paid for their services under ACS' Enterprise Agreement. Under the ACS Enterprise Agreement, employees are hired based on their skills, gualifications and suitability for the role. ACS' Enterprise Agreement remunerates employees at a higher rate than the modern award. Additionally, all staff, regardless of their demographic background and vulnerabilities, are protected by ACS' various policies and procedures.

sharing our past Modern Slavery Act Statements and simple videos designed to create

carrying out major procurement in ICT, property and construction. This training was designed to assist staff with a procurement function to identify modern slavery red

relating to modern slavery. Our Whistleblower Policy is published on our website www.anglicare.org.au/about-us/whistleblower-policy and provides a way for employees, volunteers, residents, clients, vendors, contractors and others to report their concerns confidentially, freely and without fear of repercussion. If, hypothetically, we caused or contributed to modern slavery, we would take guidance from the UN Guiding Principles on Business and Human Rights ("UNGP"), which provides that entities in this situation need to remediate the impact by taking a person-centered approach, protecting the safety, privacy and wellbeing of the affected person. We would undertake a full investigation of the situation to ensure that an appropriate corrective action plan is implemented and assess how similar impacts could be avoided in the future. We have not identified any reports that could be linked to modern

4. How we assess the effectiveness of our actions

As described in the UNGP, "tracking is necessary in order for a business enterprise to know if its human rights policies are being implemented optimally, whether it has responded effectively to the identified human rights impacts, and to drive continuous improvement".

In our previous Modern Slavery Act Statements, we sought to track the effectiveness of our actions over the subsequent reporting periods by setting goals in relation to our operations and supply chain. We have provided in the table below an overview of our progress against these goals. During the course of the next reporting period, we will continue to review, monitor and embed our processes in accordance with the table below.

Workstream	Activities	Methods for tracking effectiveness	Status as at FY22
Operations	Annual review of ACS processes to identify and address modern	a. Obtaining and assessing feedback from staff and management teams regarding the adequacy of the policies in place to address modern slavery risks in our operations;	Ongoing
	slavery risks in our operations.	Revising policies and processes as and when required to improve the way in which modern slavery is addressed;	Ongoing
		C. Providing staff training designed to raise awareness of modern slavery risks.	Completed
	Review of grievance mechanism	d. Regularly review reported cases with a view to assess how these were handled, and how the response could have been improved.	Ongoing
Procurement	Conduct an audit of the prequalification checks for suppliers to determine if mitigation measures have	e. Conducting checks with the assistance of the Finance team to see if any supplier invoices were paid without the supplier undergoing the prequalification checks so as to close gaps (if any);	Completed
	been consistently actioned	f. Assessing the percentage of supplier agreements entered into with the updated modern slavery clause and looking into the circumstances of when suppliers sought to negotiate out of the clauses (and reasons for same);	Ongoing
		G. Comparing ethiXbase questionnaire responses as against prequalification documentations (to check for any irregularities);	Ongoing

Workstream	Activities	Methods for tracking effectiveness	Status as at FY22
 number of high- risk suppliers and levels of awareness among staff. i. Identifying the higher rist the ethiXbase quest developing plans for diligence measures; j. Tracking the number of 	developing plans for further due diligence measures; j. Tracking the number of individuals who have undertaken modern slavery	Ongoing Completed Completed*	
	Supplier engagement	 k. Conducting periodic checks on suppliers to verify their compliance with the Code; l. Recording the instances of non- compliance and developing corrective action plans as and when required. 	Ongoing Ongoing
	Further due diligence	M. Engaging further with the suppliers that responded in the modern slavery questionnaire that they have been the subject of a negative human rights audit and/or have not implemented controls to protect the health and safety of their workforce to determine appropriate next steps (eg remediation, corrective action plans).	Not applicable in FY22

*100% of staff charged with supplier selection completed modern slavery training.

Goals for Financial Year 2023

Our modern slavery goals for FY23 include:

- Undertaking a targeted risk assessment of the cleaning sector within ACS, recognising it as a high-risk sector particularly vulnerable to modern slavery;
- Undertaking a targeted risk assessment of ACS' PPE providers and providers of cotton bedding, recognising these as a high-risk sectors particularly vulnerable to modern slavery;
- Continuing to assess and review processes within out various Operations and Procurement workstreams;
- Continuing supplier engagement and due diligence with suppliers through the ethiXbase questionnaire. Anglicare will employ a risk-based approach in issuing questionnaires to high-risk suppliers that are under the annual spend threshold based on their industry / geographical risk profile;
- Continuing to provide modern slavery training to ACS staff;
- Consideration of the recommendations made in the recent Modern Slavery Disclosure Quality Ratings (ASX 100 Companies Update 2022) published by the Monash University.

5. Consultation with any entities owned or controlled

ACS is the Trustee of the Anglicare Foundation Funds (the "**Foundation**") (ABN 24 086 334 058) which was established by a Trust Deed dated 31 December 1984 and subsequently varied on 15 November 1989 and 11 September 2018. The amendments made on 11 September 2018 give effect to the creation of an ACS gift fund for identifying and recording gifts that can only be used in accordance with the objects of ACS. The deed provides that the Foundation's Trust Funds shall be applied and used exclusively for the support of the work of ACS, the Trustee.

The Foundation does not have any operations that are independent of ACS. Therefore, consultation with the Foundation was not required for the purposes of preparing this statement.

6. Any other relevant information

Through the many services we offer, such as food and financial assistance, housing, cross cultural services and counselling, we seek to contribute to addressing the structural factors that can lead to modern slavery. For example, we work to assist migrants, refugees and asylum seekers to learn English, provide counselling and facilitate community connections. ACS also provides a range of social and housing options affordable for households on very low, low and moderate incomes. We seek to provide households with pathways to unassisted and affordable housing housing solutions.

Our financial assistance programs include no interest loan schemes, financial counselling, utility bill assistance, rental arrears assistance, bond assistance, medical assistance to assist with pharmacy costs, and advocacy support to negotiate lower specialist fees. ACS currently provides assistance to 625 older Australians through their social and affordable housing program in the Greater Sydney region. Across 8 locations, our residents are provided with a safe place to call home and in which to belong to a community. Tailored case management support is also provided to residents where required. Most residents are comforted by the fact that they have a place where they can live whilst they are still able to remain independent. During 2022, ACS delivered an additional 399 social and affordable housing units in Greater Sydney.

We believe these are just some of the ways ACS can contribute to addressing the root causes that can lead to modern slavery.

Mandatory reporting criteria & page reference

Mandatory crite	ria for Statements under the <i>Modern Slavery Act 2018</i> (Cth)	Page number/s
Section 16 (1) (a)	Identify the reporting entity.	3 - 5
Section 16 (1) (b)	Describe the reporting entity's structure, operations and supply chains.	5 - 8
Section 16 (1) (c)	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	9 - 13
Section 16 (1) (d)	Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including duediligence and remediation processes.	14 - 15
Section 16 (1) (e)	Describe how the reporting entity assesses the effectiveness of these actions.	16 - 17
Section 16 (1) (f)	Describe the process of consultation with any entities the reporting entity owns or controls.	18
Section 16 (1) (g)	Any other information that the reporting entity, or the entity giving the statement, considers relevant.	18

