



**BaptistCare**

Financial Year 2024-25

# Modern Slavery Report

*Because  
we care*

# Together as ONE

Baptcare



## Important Information

This statement is published in accordance with the Australian Modern Slavery Act 2018. It outlines the steps taken by BaptistCare during the financial year ending 30 June 2025 to assess and address modern slavery risks in its operations and supply chains.

Forward-looking statements reflect current intentions and are subject to factors outside BaptistCare's control, which may lead to different outcomes. Past performance is not indicative of future results. This statement builds on our previous submissions and addresses feedback from the Attorney-General's Department to ensure full compliance with all mandatory criteria under Section 16 of the Act.



## Message from the Chair and the CEO

On behalf of the Board and Executive, we are pleased to present BaptistCare’s Modern Slavery Statement for the year ending 30 June 2025. This statement highlights the proactive steps taken to identify, prevent, and mitigate modern slavery risks across our operations and supply chains, including our newly merged entities (Baptcare in Victoria and Tasmania, and Baptist Care South Australia).

Grounded in our Christian faith and guided by our vision of “every individual living well,” we remain committed to promoting human rights and addressing modern slavery. Our mission to “transform lives by expressing the love of Christ” drives us to uphold dignity and respect in all interactions and ensure our operations reflect these values.

During FY2024/25, BaptistCare strengthened its modern slavery risk management framework through targeted, merger-aligned enhancements. Key actions included:

- **Updating due diligence processes** to align with our expanded national footprint, incorporating lessons from the Modern Slavery Act review and enabling comprehensive supplier assessments.
- **Engaging 100% of national suppliers** in due diligence outreach.
- **Expanding rollout of the Supplier Code of Conduct**, integrating it into purchase orders and communications to reinforce ethical standards across merged entities.
- **Centralising procurement** via the Procure to Pay platform, harmonising supplier onboarding and enhancing sector visibility for consistent due diligence processes nationwide.
- **Conducting robust consultations** with all owned and controlled entities to ensure unified adoption of iPROs modern slavery platform.

We acknowledge modern slavery as a global human rights challenge and welcome the recent establishment of Australia’s inaugural Anti-Slavery Commissioner. We look forward to working collaboratively to strengthen our collective response.

As a leading care and community services provider, BaptistCare continues to support vulnerable groups, including culturally and linguistically diverse communities, through women’s services, housing, and community programs. This statement reflects our commitment to transparency, ethical practice, and meaningful action toward eradicating modern slavery.

This statement was approved by the Board of Directors of BaptistCare in their capacity as principal governing body on the 5th of December 2025.

This Statement is signed by Charles Moore in his role as CEO of BaptistCare and Tim Farren in his role as Chairman of BaptistCare on the 5th of December 2025.

Tim Farren  
Chairman, BaptistCare

Charles Moore  
Chief Executive Officer, BaptistCare

# BaptistCare's Entity, Operations & Supply Chains

## About BaptistCare

BaptistCare is a Public Company Limited by Guarantee and a public benevolent institution registered with the Australian Securities and Investments Commission (ASIC), the Australian Charities and Not-for-profits Commission (ACNC), and the Australian Taxation Office (ATO).

Following a merger with Bapcare (VIC/TAS) and Baptist Care South Australia on the 7th of March 2025, BaptistCare now operates across New South Wales, the Australian Capital Territory, Western Australia, Victoria, Tasmania, and South Australia.

Table 1: BaptistCare is the head entity that owns or controls the following entities:

BaptistCare Entity	About
Bapcare Ltd	Provides aged care, retirement living, home care, disability support, family services, and affordable housing across VIC, TAS and SA.
Bapcare Affordable Housing Ltd	Develops and provides affordable housing for low-income individuals and families at risk of or experiencing homelessness in VIC.
Baptist Care SA	Delivers community services, including homelessness support, family care, mental health assistance, and refugee services across SA.
Baptistcare Community Housing Limited	Registered community housing provider of affordable social and transitional housing, along with support services, for seniors and single-parent families in NSW, ACT, and WA.
Baptistcare WA Limited	Provides residential aged care, home care services, retirement living, and support for people with disabilities and disadvantage in WA.
Gnocci Holdings Limited	In its own capacity and as trustee for The Gnocci Charitable Trust.
BaptistCare Retirement Living WA	Previously known as Eventide Homes. This entity operates retirement villages in WA.
Baptistcare Seniors Housing Pty Ltd	Provides affordable and social housing options to promote independence and wellbeing in NSW, ACT, and WA.



This joint statement, submitted under Section 14 of the Australian Modern Slavery Act 2018, reflects the collaborative efforts of all owned and controlled entities to address modern slavery risks across our now expanded operations and supply chains.

## BaptistCare's Operations

From older Australians and their families to people facing significant disadvantage, BaptistCare creates strong and caring communities, and supports over 67,000 people across NSW, ACT, WA, VIC, TAS and SA.

We provide a wide range of services including residential aged care, BaptistCare at home, retirement living, family and community services and housing. BaptistCare also delivers chaplaincy services across its divisions.

Together  
as ONE

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## Staff

Our workforce, including over 12,000 employees and 1,900 volunteers, are protected by Australian workplace laws and supported by comprehensive wellbeing programs, employee assistance initiatives, and internal policies that promote a culture of safety and care. All staff, including internationally recruited care workers and employees of our wholly-owned subsidiaries,

are vetted for compliance with labour standards and modern slavery risk controls.

We are also committed to fostering a diverse and inclusive workforce and remain to be a member of the Diversity Council of Australia (DCA).

## About our Supply Chains

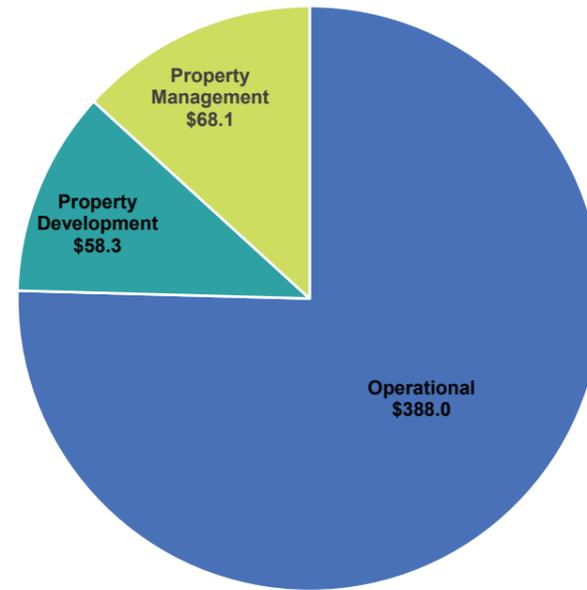
In FY2025, BaptistCare's supply chain expanded across our newly merged entities compared to the prior reporting period. It continues to encompass a diverse array of goods and services spanning accommodation and food services, agriculture, construction, cleaning, education, energy, finance, healthcare, information technology, manufacturing, mining, professional services, retail, transportation, waste management, and more. These goods and services are sourced by our suppliers both domestically and internationally.

For the financial year ending 30 June 2025, our total procurement expenditure was \$512.74 million.

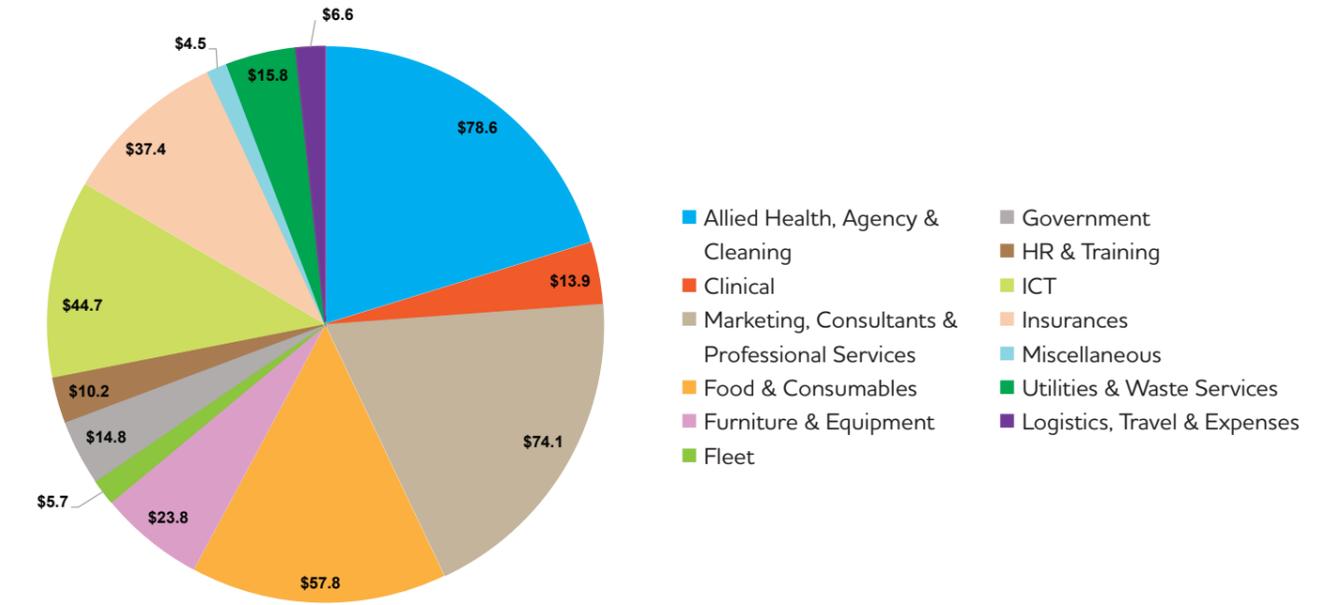
During this period, we focused on integrating and centralising supplier networks, including those from recent mergers and acquisitions, to enhance modern slavery risk management across the organisation.

Our national supply chain expenditure is categorised by supplier type and number of suppliers as follows.

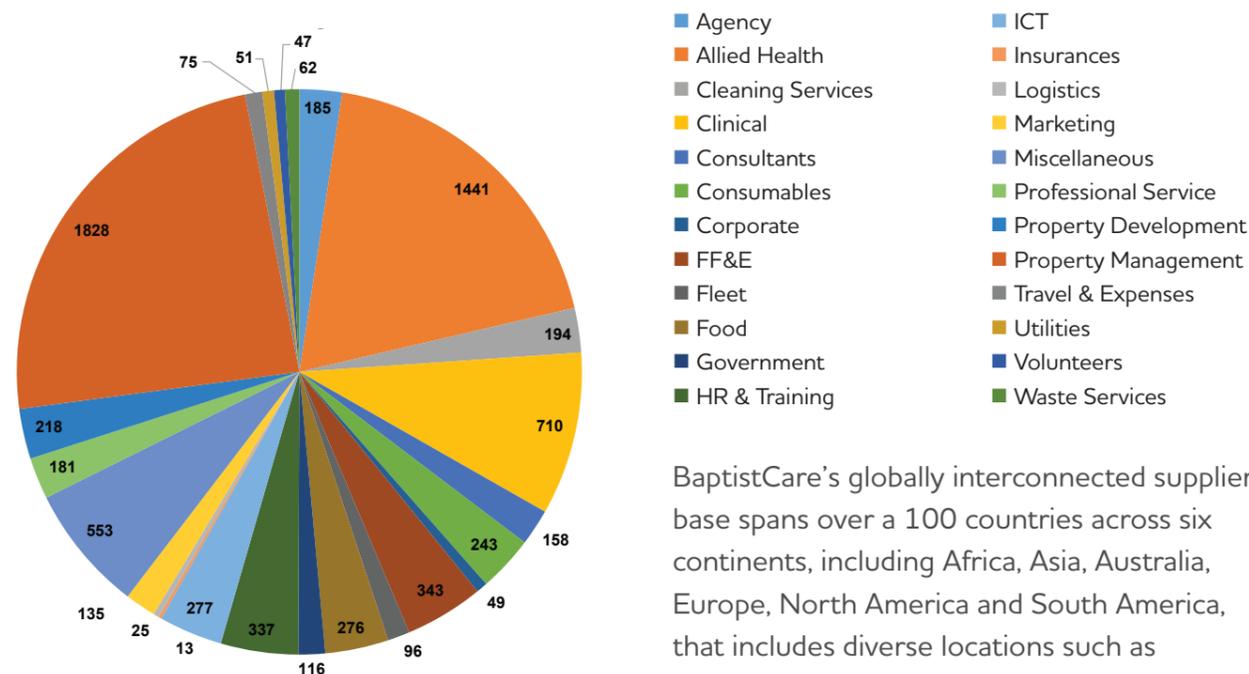
## Property vs Operational Expenditure Spend FY24/2025 (\$m)



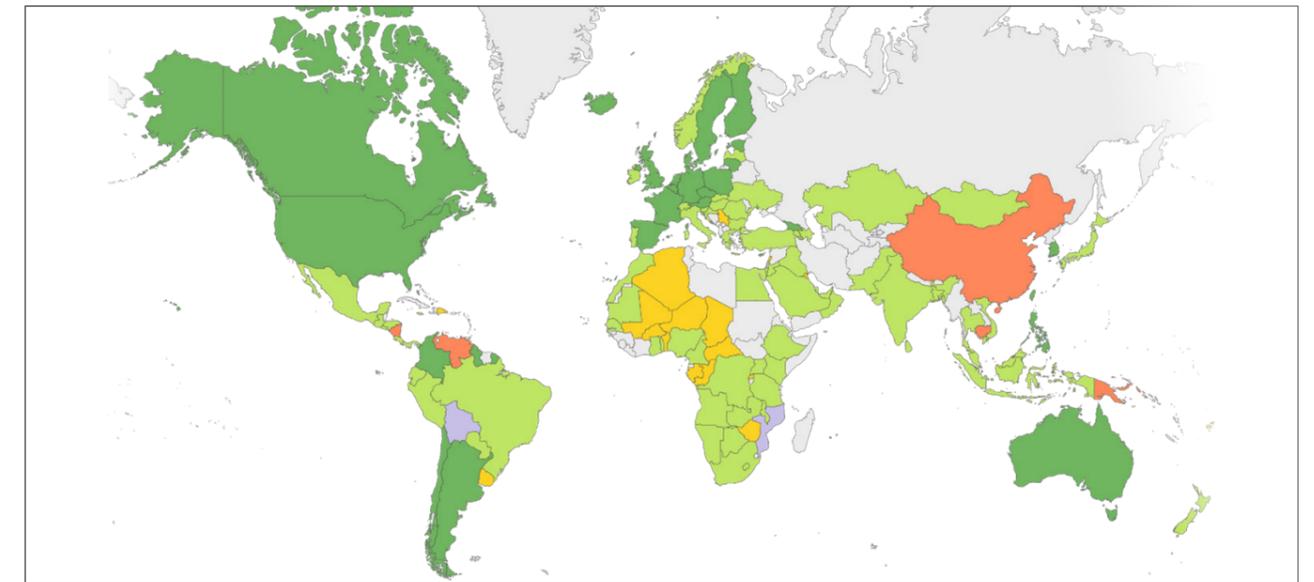
## Operational [non-property] Expenditure - Breakdown FY24/2025 (\$m)



## Supplier by Vendor Category FY24/2025 (\$m)



BaptistCare's globally interconnected supplier base spans over a 100 countries across six continents, including Africa, Asia, Australia, Europe, North America and South America, that includes diverse locations such as Algeria, Armenia, Fiji, and Mauritius reflecting our broad geographic footprint.



- Tier 1 -** Countries and regions whose governments, at the date of this assessment, fully meet the Trafficking Victims Protection Act's (TVPA) minimum standards.
- Tier 2 -** Countries and regions whose governments, at the date of this assessment, do not fully meet the TVPA's minimum standards, but are making significant efforts to meet those standards.
- Tier 2 Watch List -** Countries and regions whose governments, at the date of this assessment, do not fully meet the TVPA's minimum standards, and as the (increasing) number of victims is significant without proportional action, and/or no evidence of increased efforts to combat trafficking has been provided.
- Tier 3 -** Countries and regions whose governments do not, at the date of this assessment, fully meet the minimum standards and are not yet making significant efforts to do so.
- Tier Special Case -** Due to civil conflict and humanitarian crises, gaining information is difficult and a tier has not been assigned.
- Uncategorised -** At the date of this assessment, insufficient information is available about these countries or regions and a tier has not been assigned.

Source: iPro platform. Our supplier's source from and/or operate in a broad range of jurisdictions. This map has been overlaid with a colour tier system inspired by the Trafficking in Person Report.

# Risks of Modern Slavery in BaptistCare's Operations and Supply Chain

BaptistCare recognises that our operations and global supply chain may pose risks of causing, contributing to, or being linked to modern slavery – such as forced labor, debt bondage, human trafficking, forced marriage, and child labor – which deprive individuals of their freedom, rights, and dignity.

## In our operations

BaptistCare assesses the risk of modern slavery within our direct workforce as low. We comply with all relevant employment laws and regulations, ensuring positive working conditions through access to an employee assistance program, comprehensive wellness initiatives, and not-for-profit salary packaging. However, we acknowledge a higher risk of modern slavery with workers that are engaged through labour hire agencies, where vulnerabilities such as debt bondage or exploitative practices can occur.

To mitigate such risks, we prioritise staff retention strategies and enhanced rostering capabilities to reduce reliance on agency workers. Additionally, under our employer sponsorship policy, that is fully compliant with the Migration Act 1958, we prohibit the recovery of recruitment or visa nomination fees for sponsored workers, ensuring fair repayment agreements within our workforce.

## In our supply chain:

To address modern slavery risks across our supply chains, BaptistCare has partnered with the iPRO Modern Slavery Platform. In 2025, we initiated a comprehensive due diligence process – engaging all suppliers, including those from newly merged entities, by requesting completion of a standardised Modern Slavery Assessment Tool (MSAT) already adopted by over 40,000 Australian suppliers.

This collaborative approach streamlines supplier reporting and engagement, enabling consistent identification and mitigation of modern slavery risks. Our inclusive due diligence process facilitates clear evaluations of all suppliers – regardless of size or risk profile – generate tailored risk reports, pinpoint awareness gaps, and deliver automated action plans aligned with our Supplier Code of Conduct and Human Rights Position Statement. By recognising the potential risks even among small businesses like sole traders, we actively encourage full supplier participation to foster joint risk mitigation.

BaptistCare's key risk categories are summarised below. These risk categories do not relate to any actual identified instances of modern slavery in our supply chain.

Table 2: Summary of key risk areas in our supply chain

CATEGORY	Potential Areas of Modern Slavery Risk
Product Manufacturing e.g., Medical Supplies, PPE	Risks of forced labour, debt bondage, and human trafficking in manufacturing processes, particularly among migrant workers. Smaller subcontractors and informal suppliers, may employ vulnerable workers with limited oversight, increasing risks of exploitation.
Electronics & IT Equipment	Forced labour and exploitative conditions in component production and assembly, especially in global supply chains. Despite industry progress, risks persist in smaller, less-regulated suppliers where workers may fear reporting abuses.
Construction & Property Development	Vulnerabilities in subcontracting chains, including forced labour and debt bondage among migrant or temporary workers. Lower-tier subcontractors, such as small firms or sole traders, may lack robust compliance, increasing risks for workers who are less likely to report exploitation.
Labour Agencies e.g., Cleaning, Nursing, Aged Care	High risk of debt bondage, forced labour, and exploitative recruitment practices, with an emphasis on migrant workers. Small or informal agencies may operate with minimal oversight, leaving workers vulnerable.
Facilities Management	Risks of forced labour and exploitative subcontracting, especially in small-scale or sole trader operations where workers may face coercion or unsafe conditions without recourse. Migrant workers are particularly vulnerable.
Food Suppliers	Risks of forced labour, child labour, and debt bondage in agricultural production and logistics, especially among seasonal or migrant workers. Small-scale suppliers and farms may evade scrutiny.
Solar and Batteries	Forced labour and exploitative practices in the production of solar panel materials, particularly in global supply chains. Risks are heightened in smaller, less-regulated suppliers where worker protections may be inadequate.

# Actions Taken and Results Achieved

During the FY 2024/25 reporting year, BaptistCare made significant strides in enhancing our modern slavery risk management capabilities and processes. Key actions and outcomes include:

- 1. Procurement:** Commenced the process of centralising procurement activities nationally, including the roll-out of 'Procure to Pay' Accounts Payable automation technology in NSW, ACT and WA.
- 2. Migration to the iPROs Modern Slavery Platform:** As one of the first joint initiatives post-merger, we transitioned to the iPRO modern slavery platform, creating a unified national approach to supplier due diligence.
- 3. Standard Modern Slavery Assessment Tool:** Adopted the Modern Slavery Assessment Tool (MSAT).
- 4. Supplier Engagement:** Actively engaged with our national suppliers to raise awareness and promote due diligence reporting.
- 5. Supplier Risk Assessment:** Engaged suppliers received inherent and unmitigated risk scores, providing greater visibility into their supply chains.
- 6. Modern Slavery Training:** We delivered online modern slavery training via our Learning Management System, equipping staff to identify and mitigate risks in daily operations.
- 7. Approach to Modern Slavery:** Our approach remains centred on robust due diligence, supplier collaboration, and continuous improvement. With enhanced visibility, updated processes, and an expanded national platform.
- 8. Updated 25/26 Actions:** BaptistCare's modern slavery actions have been updated.



## 1. SUPPLY CHAIN VISIBILITY & CONSISTENT RISK MANAGEMENT

During the reporting period there were several initiatives implemented to ensure a consistent approach across our growing national care portfolio.

- Continued focus on centralising and streamlining our procurement processes;
- Significant upgrade to financial systems with the introduction of 'Procure to

Pay' Accounts Payable Automation technology in our NSW, ACT & WA Operations;

- Integration of the WA Supplier base into the NSW/ACT Finance System, enabling consistency of the supplier onboarding and management process, and visibility of key risk sectors across our supply chain..

## 2. MIGRATION TO iPRO MODERN SLAVERY PLATFORM

As part of our commitment to ethical operations and combating modern slavery across our newly merged organisation, BaptistCare's national procurement teams agreed to adopt the iPRO platform to help strengthen supplier engagement on modern slavery due diligence reporting.

As a result, the team successfully launched the iPRO system, with the state procurement teams harmonising supplier categories and identifying all active suppliers during the reporting year.



## 3. STANDARD MODERN SLAVERY ASSESSMENT TOOL

BaptistCare adopted the Modern Slavery Assessment Tool (MSAT) through the iPRO platform which is a standardised tool aligned with globally recognised expert frameworks. The tool evaluates modern slavery risks across locations, supply chains, labour policies, and employment practices via targeted questions that pinpoint vulnerabilities like forced labour and debt bondage. This has enabled proactive identification and mitigation of modern slavery risks.

Suppliers that engage with the iPRO platform have the ability to share their completed MSAT responses with any other organisation subscribed to the platform. This streamlines supplier due diligence reporting and eases the administrative load of responding to differing reporting tools from different entities. We believe this approach will gradually boost participation in modern slavery due diligence reporting and overall improved supply chain transparency.



## 4. SCALED SUPPLIER ENGAGEMENT

During this reporting year, BaptistCare proactively requested all national suppliers - that included all sole traders - to complete the MSAT. In collaboration with the iPRO team and state level procurement teams, we managed over 2,300 supplier emails and conducted many personalised calls to explain the why and how of modern

slavery due diligence, provide clear guidance and address any concerns to promote engagement. This process resulted in 3,615 BaptistCare suppliers to complete modern slavery due diligence reporting. This represents 38.7% of our overall supplier network.



## Collaborating with Small Businesses to Strengthen Modern Slavery Awareness

As part of our supplier due diligence, the team proactively engaged with sole traders and small businesses to foster participation in BaptistCare’s modern slavery reporting initiative. We recognised that many faced initial challenges in responding, often due to limited awareness, resource constraints, or perceived limited applicability to their operations. Through personalised emails and phone conversations, the team provided clear guidance on modern slavery, sharing real-world examples from Australian cases to build understanding. In many instances, these discussions were well-received, with businesses expressing appreciation for the insights and rationale behind due diligence, leading to enthusiastic participation. While thousands of suppliers have yet to engage, we remain committed to supportive outreach to ensure inclusive progress across our entire network.



## 5. MODERN SLAVERY RISK ASSESSED FOR ENGAGED SUPPLIERS

Suppliers that completed the MSAT received two risk scores, one for inherent and another for unmitigated risk.

The inherent risk score measures modern slavery risks that are intrinsic and built-in to the operations of an organisation. This is determined by asking which countries, regions, sectors, and high-risk goods are part of their operations, production, or supply chain.

The unmitigated risk score measures the organisations risk that is still present (remains) after accounting for modern slavery risk controls that have been implemented. This is determined by asking suppliers about the policies, processes,

and procedures in place to reduce modern slavery risks.

BaptistCare’s modern slavery due diligence process demonstrated that the majority of our suppliers do not have high risk exposure, with 76% of our suppliers placed in the low risk category. However, despite promising results, there is still room for improvement. Our suppliers would gain from further knowledge development on modern slavery, and by adopting additional preventative measures that specifically address modern slavery risks.

The table below provides an aggregated risk score of all assessed suppliers for our supply chain.

Supply Chain Risk Scores		
Risk Score Type	Result	Risk
Inherent Risk Score	25.55 / 100	Low
Unmitigated Risk Score	45.32 / 100	Low/Medium*

\* The unmitigated risk score is slightly higher since BaptistCare sources in/from suppliers that work in sectors that are considered higher risk. This includes accommodation, food services, cleaning, personal services, domestic work, building services contactors, construction, labour hire and security services. Working with these suppliers to reduce unmitigated risk scores will be a priority.



## 6. OUR APPROACH TO MODERN SLAVERY



BaptistCare has adopted a comprehensive approach to address any instances of modern slavery across our operations and supply chain, that centres around board approved annual Modern Slavery Statements and extensive supplier engagement. We are also enhancing supply chain visibility through risk and spend assessments to identify vulnerabilities and leverage our communication channels – such as our website – to share insights,

promote best practices, and drive collective action to mitigate modern slavery risks across our operations and supply chain.

For this reporting year we have continued to refine and apply our approach to identify, prevent and mitigate modern slavery risks. With a prime example of our scaled approach to drive towards a fully inclusive national supplier due diligence process.

Our approach is illustrated in Table 3.

Table 3: Approach to identify, prevent and mitigate risks and account for our actions.



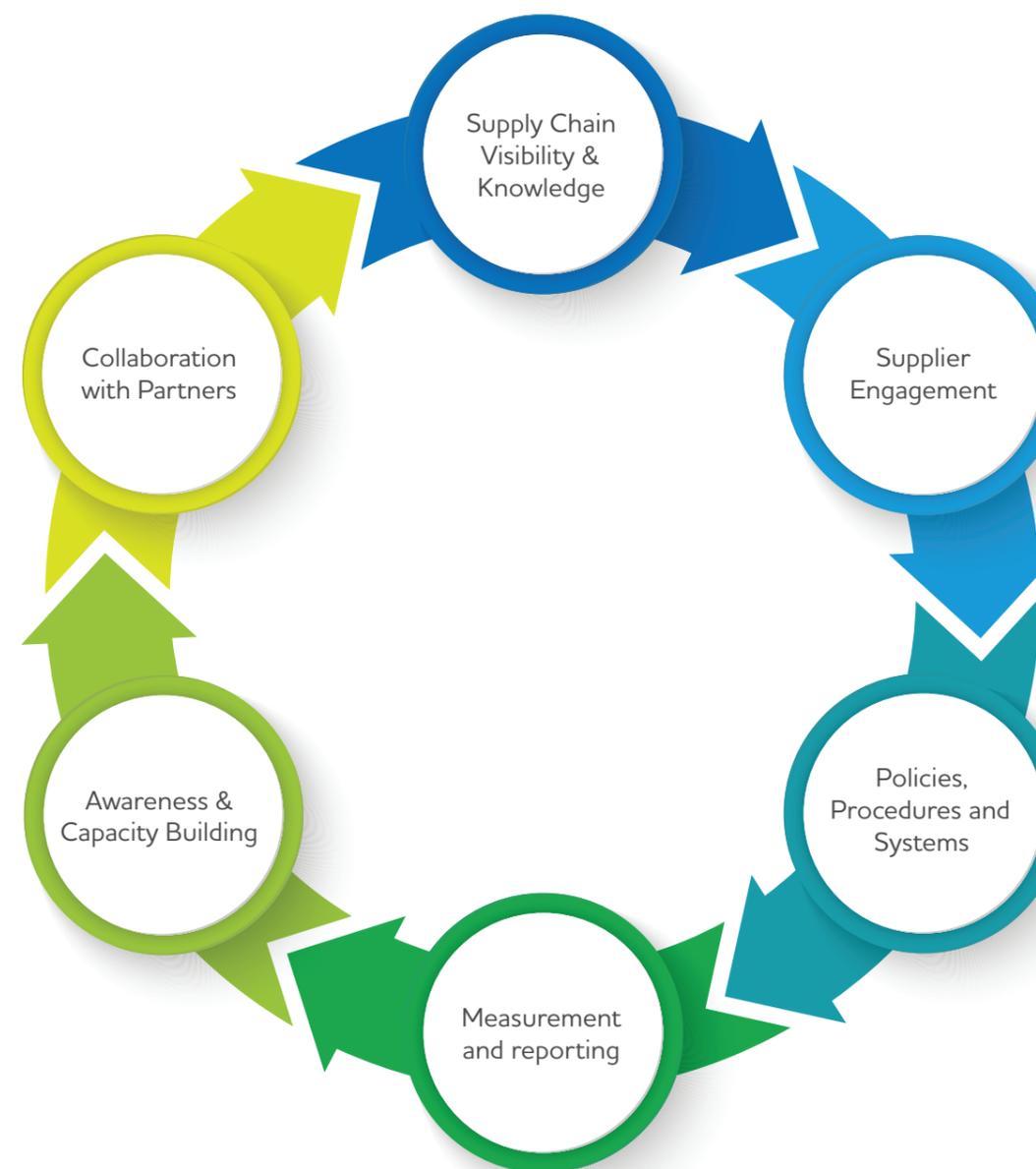
## 7. UPDATED ROADMAP



Building on actions taken to date, we updated an interim high-level one-year roadmap identifying key actions. Our roadmap centres on developing a transparent, collaborative, and high-performing supply chain ecosystem,

leveraging enhanced visibility, workforce empowerment, supplier collaboration, streamlined processes, and strategic partnerships to drive measurable success.

Caption: Key principles in our Modern Slavery Roadmap.



In addition, BaptistCare continues to maintain an independently operated whistleblower hotline. Staff are also

able to register perceived modern slavery risks via the organisation's risk management system, Fortify.

# Effectiveness of our Actions and Looking Ahead

As BaptistCare expands its national presence as a leading care provider, we also remain dedicated to identifying and combating modern slavery.

We are pleased to report good progress across all areas during the reporting period, recognising the evolving nature of such risks, we remain committed to review, assess, and enhance our approach, and incorporate lessons learnt for future strategic planning.

*Table 4: Our effectiveness and progress made during the reporting period*

What we committed	Actions undertaken during the reporting period
Integrate modern slavery approaches, policies and tools into our operations	Engaged 100% of our suppliers to join BaptistCare’s modern slavery due diligence reporting initiative.
Modern slavery roadmap	Updated our high-level roadmap.
Sharing our Supplier Code of Conduct with more suppliers from merged entities	Referenced our current Code of Conduct in PO terms and in several supplier communications.
Engaged more suppliers to complete due diligence reporting	Engaged an additional 3,615 national suppliers to complete due diligence reporting using the new Modern Slavery Assessment Tool.
Continuing internal awareness raising on due diligence	Sensitised the BaptistCare network on why we are completing modern slavery due diligence on all our national suppliers
Employee engagement and awareness	BaptistCare’s modern slavery online course continues to be provided to staff.
Reporting on Progress	Annual modern slavery statement endorsed and approved by the BaptistCare board.



# Consultations with Owned and Controlled Entities

BaptistCare actively consulted with all entities it owns or controls to identify modern slavery risks. This consultation process involved integrating these entities into our comprehensive due diligence framework, using the iPRO platform and the Modern Slavery Assessment Tool.

Through collaborative meetings, regular and shared access to the iPRO platform, we ensured all controlled entities contributed to and aligned with our risk assessment processes, supplier engagement strategies, and compliance with our current Supplier Code of Conduct and Human Rights Position Statement. This unified approach enabled BaptistCare to identify and mitigate modern slavery risks consistently across our operations and supply chains.

## Other Relevant Information:

BaptistCare is committed to combating modern slavery by addressing its root causes through our community services, including women’s services, counselling, casework, housing, foster care and food assistance. Notably, our women’s services team supports culturally and linguistically diverse groups, such as migrant sex workers, who are disproportionately vulnerable to exploitation. By working across these key issues, we are actively contributing to the prevention of modern slavery practices in Australia.

## Mandatory Reporting Criteria & Page Reference:

SECTION	CRITERIA	PAGE
Section 16 (1) (a)	Identify the reporting entity	2
Section 16 (1) (b)	Describe the reporting entity’s structure, operations, and supply chains	2-4
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	5-6
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 due diligence and remediation processes	6-8
Section 16 (1) (e)	Describe how the reporting entity assesses the effectiveness of these actions.	9-10
Section 16 (1) (f)	Describe the process of consultation with any entities the reporting entity owns or controls.	2, 13
Section 16 (1) (g)	Any other information that the reporting entity, or the entity giving the statement, considers relevant. ('Other relevant information')	13

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