



Modern Slavery Statement

Scalabrini Village Limited
ABN: 24 000 770 598
Non-Profit Organisation
Information Period
Industry Sector
Country

01 July 2024 to 30 June 2025
Aged Care, Independent Living, Support at Home Services
Australia Reporting Obligation: Modern Slavery Act 2018

INTRODUCTION

Scalabrini Village Ltd (SVL) recognises the enduring risk of modern slavery globally, and its continuing prevalence in some industries and global markets. We recognise that freedom from slavery is a human right protected by a multitude of international treaties and covenants, including The Australian Modern Slavery Act 2018 (Cth) and the Universal Declaration of Human Rights, and is actively committed to ensuring that no element of modern slavery exists in our operations or supply chains.

We have zero tolerance for modern slavery in all its forms.

We are submitting our annual statement in accordance with the Federal Governments legislation, addressing modern slavery risks in our domestic operations and supply chains with our suppliers and contractors in partnership with a third-party specialist's (iPRO) Modern Slavery Assessment Tool.

The organisation is a single reporting entity and does not own or control other entities as defined under the Modern Slavery Act 2018. Consultation for this statement involved internal stakeholders across key areas of the business, including operations, procurement, and compliance, to ensure comprehensive coverage of all relevant aspects in this assessment and statement.

STRUCTURE AND OPERATIONS

Scalabrini Village Ltd is a not-for-profit (profit-for-purpose) aged care organisation operating in 6 communities across New South Wales. Established in the 1970s in western Sydney by the Scalabrini Missionaries, Scalabrini provides high-quality, faith-based aged care with a focus on empowering individuals, especially those of migrant backgrounds, to maintain their cultural identity and traditions while feeling at home and in control of their lives. The organisation aims to create a vibrant environment that fosters a sense of purpose, choice, dignity, and belonging for its residents and their families.

The organisation generated total revenue of \$112m in FY25 and employs over 1,150 staff.

Our operations include:

- Residential Aged Care Facilities
- Retirement and Independent Living Villages
- Support at Home and Community Care Services

SUPPLY CHAIN

The organisation's supply chains encompass the following areas:

- Accommodation and Hotel Services;
- Construction;
- Healthcare Services;
- IT Services and Software;
- Food Services Activities;
- Manufacturing, Wholesale & Trade.

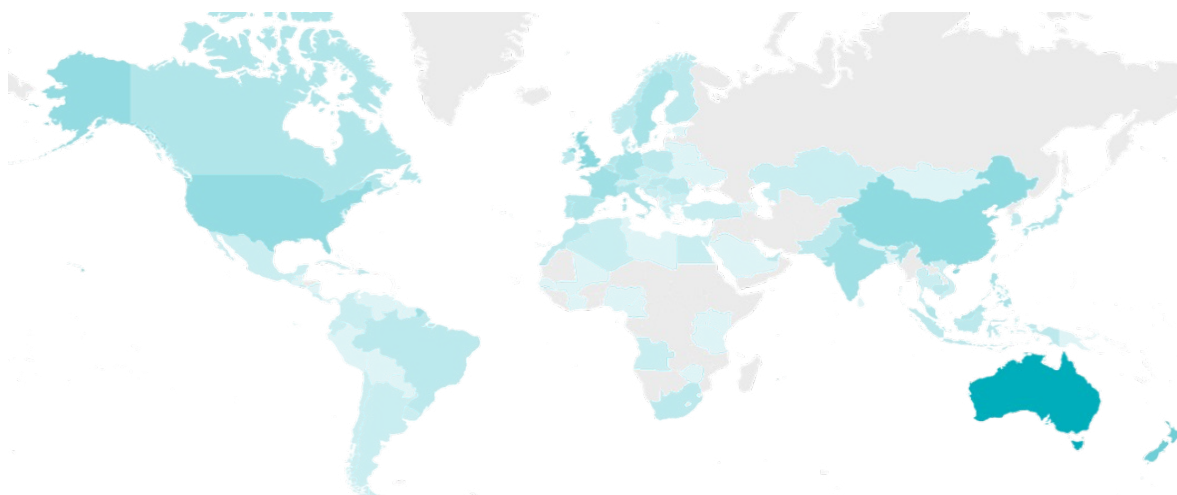


MODERN SLAVERY RISKS WITHIN THE OPERATIONS

The organisation recognises that the fight against modern slavery requires a systematic and continuous effort and is integrated into our stance as an ethical and compliant corporate citizen. Our suppliers operate in the following sectors:

- Accommodation and Food Service Activities
- Administration and Support Services
- Agriculture, Forestry, and Fishing
- Arts, Entertainment and Recreation
- Building services contractor
- Cleaning
- Construction
- Domestic work
- Education
- Electricity, Gas, Steam and A/C supply
- Finance and Insurance
- Government administration, Defence and Social Security
- Health and Social Work
- Information and Communication
- International organisations, Diplomatic and Consular Services
- Labour hire
- Maintenance and Repair of motor vehicles
- Manufacturing
- Personal services
- Professional and Scientific Services
- Real estate
- Retail
- Security services
- Transportation and Storage
- Water supply, Sewerage and Waste Management
- Wholesale

Our suppliers source from a wide range of countries around the world as illustrated in the map below.



RISKS OF MODERN SLAVERY PRACTICES

Modern slavery refers to various forms of exploitation and coercive practices that deprive individuals of their freedom, rights, and dignity. It encompasses situations where individuals are forced or coerced into labour, servitude, or human trafficking against their will. Modern slavery can take different forms, including forced labour, debt bondage, forced marriage, human trafficking, and child labour. The International Labour Organisation estimates that over 50 million people around the world are victims of modern slavery.

In recent years, supply chain transparency is a key policy strategy used by governments to identify and prevent business practices that lead to modern slavery.

1. Scalabrini Operations

The organisation's operations are centred around aged care services, independent living accommodation and support at home services. All employees have provided evidence of their right to work in Australia and are employed in accordance with relevant awards, enterprise agreements and industrial laws. Any labour hire or agency staff requirements are filled by local organisations which operate in accordance with the law and who provide evidence of their staff's right to work in Australia prior to engagement by the organisation.

Consequently, we consider the risk of modern slavery within its operations to be minimal due to the direct control of operations and engagement of its workforce.
















2. Scalabrini Supply Chain

We believe our greatest area of vulnerability to modern slavery practices exists in our supply chain. Our suppliers operate, produce, and source across a range of different sectors and some of these sectors can be described as high-risk.


High-risk sectors are those in which human trafficking activities are known to occur and were identified in the Global Estimates of Modern Slavery and child labour exploitation that were separately identified in Child Labour: Global Estimates 2020 Trends and the Road Forward (ILO and UNICEF, 2021). The below graphics show the high-risk sectors of operation, production, and sourcing for our suppliers. The numbers in the following graphics describe how many suppliers are in each sector.
















Our Suppliers Operate in the following High-risk Sectors:



















| | |
|--|--|
|  Accommodation and Food Service Activities 12 |  Agriculture, Forestry, and Fishing 1 |
|  Building services contractor 19 |  Cleaning 13 |
|  Construction 25 |  Domestic work 6 |
|  Labour hire 2 |  Maintenance and Repair of motor vehicles 2 |
|  Manufacturing 24 |  Mining and Quarrying 2 |
|  Personal services 4 |  Retail 15 |
|  Security services 6 |  Transportation and Storage 8 |
|  Wholesale 18 | |



Our Suppliers Produce Goods and Provide Services in the following High-risk Sectors: 

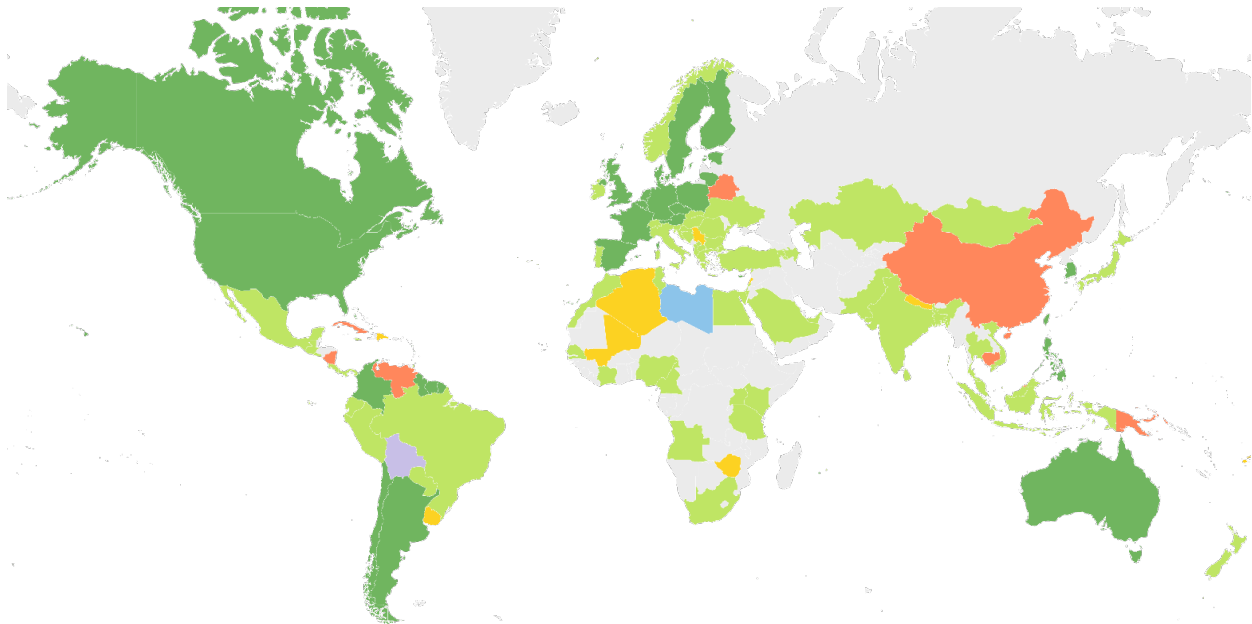
| | |
|---|---|
|  Accommodation and Food Service Activities 20 |  Agriculture, Forestry, and Fishing 3 |
|  Building services contractor 19 |  Cleaning 15 |
|  Construction 32 |  Domestic work 6 |
|  Labour hire 2 |  Maintenance and Repair of motor vehicles 4 |
|  Manufacturing 19 |  Mining and Quarrying 5 |
|  Personal services 4 |  Retail 17 |
|  Security services 5 |  Transportation and Storage 11 |
|  Wholesale 16 | |

Our Suppliers Source Goods and Services from the following High-risk Sectors: 

| | |
|---|---|
|  Accommodation and Food Service Activities 14 |  Agriculture, Forestry, and Fishing 5 |
|  Building services contractor 13 |  Cleaning 20 |
|  Construction 19 |  Domestic work 1 |
|  Labour hire 8 |  Maintenance and Repair of motor vehicles 8 |
|  Manufacturing 21 |  Mining and Quarrying 2 |
|  Personal services 3 |  Retail 9 |
|  Security services 8 |  Transportation and Storage 11 |
|  Wholesale 21 | |

Some countries or regions where our suppliers source from can be described as high-risk due to the possibility of a link to human trafficking. The geographical regions where our supply chain partners source are shown in the map below. This map has been overlaid with the colour tier system of the **Trafficking in Persons Report**.





Trafficking in Persons Report Tiers

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.

Some goods and services produced and sourced by our suppliers can be described as high-risk due to the possibility of a link to modern slavery practices such as forced labour and child labour within particular countries. For our purposes, they are as follows:-

- Australia Building services contractor, Cleaning, Labour hire, Security services
- Cambodia Textiles
- Canada Cleaning
- China Textiles
- Pakistan Textiles
- UK Cleaning
- USA Cleaning
- Vietnam Textiles
-

There is modern slavery risk associated with sourcing the following goods and services from the countries listed below:

- Australia Building services contractor, Cleaning, Labour hire, Security services
- China Electronics, Garments
- Vietnam Coffee

ORGANISATIONAL APPROACH

The organisation has adopted an approach of Assess, Address and Remediate with our suppliers. This approach will be utilised on an annual basis to support and inform our ongoing submissions.

Assess

The organisation used a third-party provider iPRO and their Modern Slavery Assessment Tool to assess potential modern slavery risks identified in our operations and supply chain. During the reporting period, iPRO conducted assessments on our operations and 250 suppliers were identified and they collectively represent 97% of spend.

Participating suppliers were asked to complete a self-assessment questionnaire online. After each supplier completed and submitted the questionnaire, their responses were assessed to determine their modern slavery risk scores and associated risk category.

To determine the appropriate risk category, responses were first evaluated for risks inherent to a supplier's operations, production, and sourcing. This is referred to as the Inherent Risk Score. The Inherent Risk Score was calculated based on geography, the type of goods, industry sector, and workforce parameters that the supplier indicated in the Modern Slavery Assessment Tool (MSAT).

Next, the *Unmitigated Risk Score* was evaluated. This score was calculated based on the policy and procedure responses on the questionnaire. A supplier's Unmitigated Risk Score determined whether they were categorised as having inadequate, partial, or adequate risk control.

Then, the risk scores for each assessed supplier were aggregated and averaged, resulting in an Aggregated Inherent Risk Score and an Aggregated Unmitigated Risk Score for the overall supply chain.

Each supplier that completed the assessment and the summary of results for suppliers results for the organisation were follows:

| Risk Category | % of Suppliers | # of Suppliers | \$ Spend | % of Total Spend |
|--|----------------|----------------|--------------|------------------|
| Low Risk | 37.2% | 93 | \$14,731,681 | 48.61% |
| Medium Risk (partial risk control) | 21.6% | 54 | \$5,081,083 | 16.77% |
| High Risk (inadequate risk control) | 12.8% | 32 | \$1,286,000 | 4.37% |
| High Risk (inadequate risk control) | 0.4% | 1 | \$1,250,000 | 4% |
| High Risk (high levels of inherent risk) | 0% | 0 | 0 | 0% |
| Non Respondent (failed to respond) | 28% | 70 | \$7,956,627 | 26.25% |

Address

Suppliers that completed the self-assessment were given action items to complete post-assessment with the iPRO Solution. The action items provided to each supplier were based on their responses to the questionnaire, and if implemented, will reduce the unmitigated risks identified during the assessment.

Action items were also aggregated, giving the organisation a focused view of the most impactful actions that could be taken by suppliers across the supply chain.

While Suppliers have been provided with an action plan via iPro, the team are implementing quality changes in terms of supporting suppliers to mitigate and reduce risk going forward with our remediation processes noted below.



Remediation

The organisation recognises that some of our suppliers, ranging from sole traders to large companies, operate in higher modern slavery risk environments and we have launched a supplier follow-up initiative to engage in discussions about action items and mitigate identified risks via iPRO.

Our procurement is centrally managed, providing thorough oversight of suppliers and ensuring consistency in the application of systems and processes. We are engaging directly with suppliers to initiate conversations about Modern Slavery and provide directions to access resources to help suppliers voluntarily reduce their risk scores.

Other ways the organisation is remediating modern slavery risks:

- Supplier Management:
 - » For new suppliers, a risk assessment is to be completed and they are required to acknowledge the code of conduct.
 - » For existing suppliers, they are invited to complete an annual risk assessment, with a focus on demonstrating improvements.
- The Modern Slavery Awareness Training Module will be added for employees to complete.
- There is an initiative underway to update Service Level Agreements to include modern slavery clauses.
- A Modern Slavery questionnaire is now added to tender documentation.
- The Procurement Policy will be updated to source local suppliers with local supply chains where possible.

ASSESSMENT OF PROGRESS

We utilise the benchmarking and KPI's in the iPRO Modern Slavery Assessment Tool to assess the effectiveness of our actions. As this is our first year, we have used the platform to conduct our assessments and due diligence as this will enable us to objectively measure the effect when the assessments are completed during the next reporting period.

The main KPI's we are using to benchmark our efforts are the risk scores that are generated as part of the assessment process. Each organisation who completed the assessment questionnaire was assessed and given two risk scores:

- Inherent Risk Score
- Unmitigated Risk Score

The *Inherent Risk Score* measures modern slavery risks that are intrinsic/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.

The platform provides an aggregated risk score of all the assessed suppliers, and we use this aggregated score to measure the risk on an overall supply chain level. We aim to continuously improve on these KPI's year on year with a greater competition rate of Supplier Questionnaire and a reduction in Inherent and Unmitigated Risk Scores.



As we take actions within our organisation, and with our suppliers, we will be able to assess the effectiveness of our modern slavery action plan to reduce the Unmitigated Risk Score by introducing relevant policies and procedures. In addition we will provide annual awareness education and training (free & paid resources) on modern slavery risks to our suppliers. We also measure the effectiveness of our engagement with suppliers and will continue to encourage participation in our assessment programme to better identify and mitigate modern slavery risks in our supply chain.

The Internal KPIs for the next reporting period include:

- Increasing existing Supplier Assessment completion response rates to over 80%.
- Promoting continuous improvement for existing suppliers to reduce their Risk Scores by 10%.
- Education module participation completion rate for SVL employees to 100%.

CONCLUSION

Scalabrini Village Ltd confirms our zero tolerance for modern slavery in all its forms. We are committed to remediation steps, including follow-up with suppliers on action items and ensuring robust policies are in place. We look forward to contributing within our sphere of impact and influence to supporting the reduction and eradication of modern slavery within Australia and the rest of the world.

This Modern Slavery Statement has been approved by the principal governing body of Scalabrini Village Limited in accordance with section 13 of the Modern Slavery Act 2018.

Authorised Signatory:



Name: Richard de Haast

Title: Chief Executive Officer

Date: **5th November 2025**