



AUSTRALIAN CATHOLIC
**ANTI-SLAVERY
NETWORK**

ACAN COMPENDIUM OF CATHOLIC
**MODERN SLAVERY
STATEMENTS**

1 JANUARY TO
31 DECEMBER 2025



ACAN COMPENDIUM
EXECUTIVE SUMMARY

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Facilitated by the
Catholic Archdiocese
of Sydney

ACAN
ABN 15 913 623 678
acan.org.au

Domus 8.7
ABN 24 472 497 189
domus87.org.au

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1 About ACAN

1.1 Catholic member organisations

NSW

Catholic Archdiocese of Sydney
Catholic Cemeteries + Crematoria
Catholic Diocese of Maitland-Newcastle
Catholic Education Diocese of Bathurst
Catholic Education Diocese of Wagga Wagga
Catholic Education Diocese of Wollongong
Catholic Education Network
Catholic Schools Armidale
Catholic Schools Broken Bay
Catholic Schools NSW
Catholic Schools Parramatta Diocese
CatholicCare Sydney
Diocese of Lismore Catholic Schools
Diocese of Maitland-Newcastle Catholic Schools
Sydney Catholic Schools
St Vincent de Paul Society NSW

QLD

Catholic Archdiocese of Brisbane
Catholic Education Brisbane
Catholic Education Diocese of Rockhampton
Mercy Community
Ozcare
Southern Cross Care QLD
St Vincent de Paul Society QLD

SA

Catholic Archdiocese of Adelaide
Catholic Education South Australia

TAS

Catholic Archdiocese of Hobart
Southern Cross Care Tasmania
Catholic Education Tasmania

VIC

Catholic Archdiocese of Melbourne
Catholic Education Sandhurst
Diocese of Ballarat Catholic Education
Diocese of Sale Catholic Education
Melbourne Archdiocese Catholic Schools
St Vincent de Paul Society Victoria
Victoria Catholic Education Authority
Villa Maria Catholic Homes

WA

Catholic Archdiocese of Perth
Catholic Education Western Australia
MercyCare
Southern Cross Care WA

ACT

Catholic Education Canberra Goulburn

NT

Catholic Education Northern Territory

MULTI-STATE

Australian Catholic University

Cabrini

Calvary Health Care

Catholic Healthcare

Dominican Education Australia

Edmund Rice Education Australia

MacKillop Family Services

Marist Schools Australia

Mater

Mercy Education

Mercy Health

Southern Cross Care NSW & ACT

St John of God Health Care

St Vincent de Paul Society

Canberra Goulburn

St Vincent's Health Australia

University of Notre Dame Australia



1.2 Introduction

Modern Slavery Act 2018

The Australian Modern Slavery Act 2018 (Cth) (the Act) requires businesses and not-for-profits to take effective measures to assess, address and mitigate the risk of modern slavery to workers in supply chains and operations.

The Act requires annual reporting of activities and actions taken during the reporting period which Catholic member organisations align to the calendar year. The annual Modern Slavery Statement (Statement) must address the following seven mandatory reporting criteria:

- i. Organisational structure and governance
- ii. Operations and supply chains
- iii. Modern slavery risks in operations and supply chains
- iv. Action taken to assess and address risks, including due diligence and remediation processes
- v. Measuring effectiveness of action taken and demonstrating continuous improvement
- vi. Describe the process of consultation with entities owned or controlled
- vii. Any other information

A senior representative of the highest governing body of the reporting entity (in the case of Catholic member organisations, the Chair of the Board or Bishop) must sign the Statement and include the date of approval.





Catholic Modern Slavery Statements

ACAN Program Managers review each Modern Slavery Statement and provide structured feedback to members, aligned with the Australian Government's Guidance for Reporting Entities. This process supports continuous improvement in reporting quality, transparency, and compliance with legislative requirements.

Catholic member organisations provide annual procurement expenditure data, supplier contact information, organisational profile updates through Rota, and responses to the Sedex Self-Assessment Questionnaire (SAQ). Together, these activities provide valuable insights into modern slavery risk profiles, due diligence practices, and the effectiveness of controls implemented to identify and address risks across operations and supply chains.

Data collected through these annual assessments is aggregated and incorporated into this Executive Summary, the **ACAN Compendium of Catholic Modern Slavery Statements**, highlighting collective progress. The 2025 Compendium comprises 49 individual Statements submitted to the Australian Government's Modern Slavery Statements Register by 30 June 2026 and subsequently published on the ACAN website.



2 Operations and Supply Chains

Catholic member organisations include hospitals and aged care, schools and universities, dioceses, social and community services, finance and investment from across metropolitan and regional Australia. As a result, the supply chains of Catholic member organisations vary widely in scale and complexity.



228,806*

Staff employed



37,299

Volunteers



754,762

Students educated
in 1,530 Schools



129,602

Social Care Clients



14,896

Beds across 71
Hospitals



48,350

University students
across 11 Campuses

*Increase from reporting year 2024 linked to new ACAN members.

\$33B

ANNUAL
REVENUE

\$10.6B

ANNUAL
PROCUREMENT
SPEND

186,836

TOTAL NUMBER
OF SUPPLIERS



5,681,860

Meals served



28,982

Aged Care Beds across
246 Facilities



3 Modern Slavery Risks

3.1 Risk Assessment

Of the \$10.6 billion aggregated procurement expenditure by Catholic member organisations in 2025, \$7 billion was spent with 57,607 suppliers across 13 high risk categories.

For Catholic member organisations, modern slavery risks are defined by the ACAN Category Risk Taxonomy, a classification standard that identifies severity of actual or potential harm to people (saliency) in spend categories.

The ACAN Category Risk Taxonomy is based on sources such as:

- the Global Slavery Index
- the International Labor Organisation (ILO), including definitions of modern slavery
- the Bureau of International Labor Affairs (ILAB), US Department of Labor
- the Global Child Forum and UNICEF

Five key factors are also used to determine the level of risk:

- **Geography:** the country or location where a good is made or service is delivered
- **Industry:** the sector in which the making of goods or delivery of service occurred
- **Commodity:** the raw materials or components that comprise the goods or products
- **Workforce vulnerability:** such as bonded visas, temporary migrants, women or children known to be employed in specific industry sectors
- **Domus 8.7:** trends, cases, and risk intelligence identified through the Domus 8.7 remediation service, including grievances and remediation insights relevant to category and risk to workers.

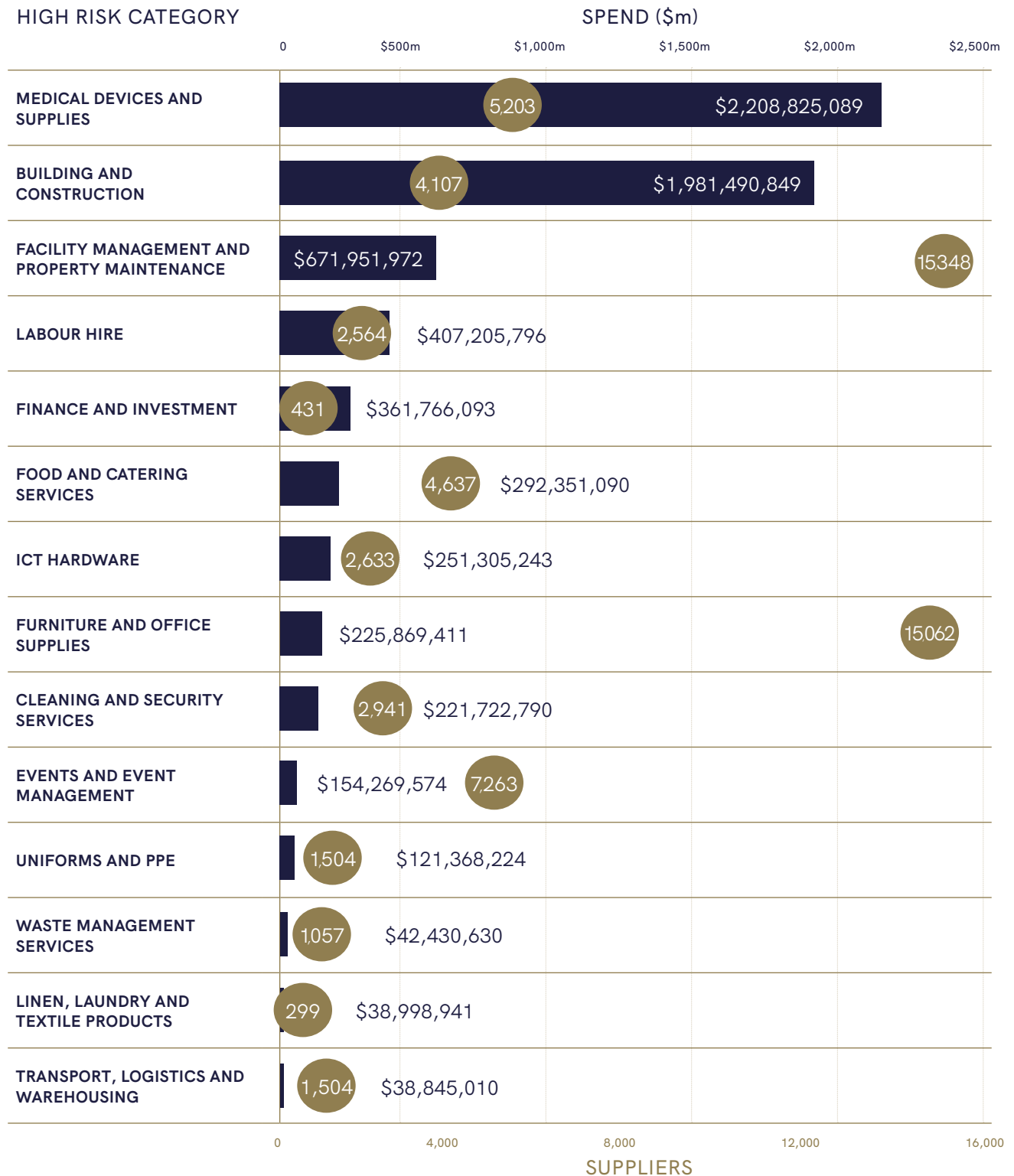






3.2 Risk Categories

Total spend and number of suppliers in high risk categories



3.3 Risk Profile



\$10.6B

COMBINED ANNUAL PROCUREMENT SPEND

With over half of total spend considered to be high risk for modern slavery.

High Risk

THE FOUR LARGEST POTENTIALLY HIGH RISK SPEND CATEGORIES ARE:

- Medical devices and supplies
- Building and Construction
- Facility Management and Property maintenance
- Labour Hire

Over 65.96% of total spend is in categories with inherent high risk of modern slavery



57,670

TOTAL NUMBER OF SUPPLIERS IN HIGH RISK SPEND CATEGORIES ACCOUNT FOR \$5.5B EXPENDITURE



4 Actions Taken to Address Risk

4.1 Supplier Engagement

The ACAN Program provides supplier engagement support and data, enabling a systematic and comprehensive supply chain risk assessment. In 2025 the ACAN Program launched a new purpose-built data management platform - ROTA. ROTA centralises the ACAN Risk Management Program framework and facilitates supplier performance evaluation and engagement.

1. Evaluation of the modern slavery risk within operations and supply chains, using the ACAN Risk Taxonomy
2. ACAN Supplier Survey to identify supplier revenue, number of employees, countries of origin for goods sourced overseas, workforce contractual arrangements and Sedex membership status
3. Supplier education on modern slavery and risk management in key areas: cleaning, building and construction, procurement of labour, labour hire and services, sourcing goods from overseas, grievance mechanisms and remediation
4. Onboarding suppliers to Sedex requires a business address, contact details and goods or services provided
5. Sedex Self-Assessment Questionnaire (SAQ) helps suppliers to evaluate their practices against established standards and identify areas for improvement
6. Desktop review to identify key actions required from suppliers
7. Enhance supplier screening using Know Your Client (KYC) intelligence software
8. Corporate Social Compliance Audits provide a point in time, objective and independent verification process of supplier alignment with local laws and worker wellbeing standards
9. Domus 8.7 Index modern slavery statement assessment on selected suppliers in high-risk categories
10. ACAN Prequalified Supplier Directory - a list of preferred suppliers accessible to Catholic organisations

ACAN Risk Taxonomy

97,814 Suppliers classified based on spend category

01

ACAN Supplier Survey

8,629 supplier surveys completed

02

Supplier Education

1 free e-learning module launched, 96 completed

03

Sedex Onboarding

547 Suppliers on Sedex

04

Sedex SAQ

355 SAQs Completed

05

Desktop Review

Launched 6 pillar desktop review on Rota, 53 completed

06

Supplier Screening

529 screenings completed

07

Audits

31 Audits completed

08

Domus 8.7 Index

32/100 Average Score for published statements

09

ACAN Prequalified supplier directory

66 Suppliers

10



SUPPLIER ACTIONS

Desktop reviews provide a consolidated assessment of modern slavery risk indicators across suppliers that can be shared by Catholic member organisations. They draw on a range of information sources, including Domus 8.7 intelligence, inherent risk, supplier workforce profiles, business size, number of employees, sourcing countries, countries of origin for migrant workers, Sedex management controls, SMETA audit results, supplier screening outcomes, Modern Slavery Statements and other publicly available information. The review helps identify where modern slavery risks may be present in a supplier's own operations or supply chains, and informs the actions required to prevent, address and remedy those risks.

E-LEARNING

ACAN e-learning modules were reviewed and updates launched for Modern Slavery 101, Modern Slavery - Business Relevance, Modern Slavery - Grievance & Remedy and Modern Slavery Risk Management for Suppliers. Supplier training module is online, free and a certificate provided upon completion.

63%

of suppliers engage temporary visa holders, labour-hire, casuals, sub-contractors, workers under 18 years of age or people with disability.

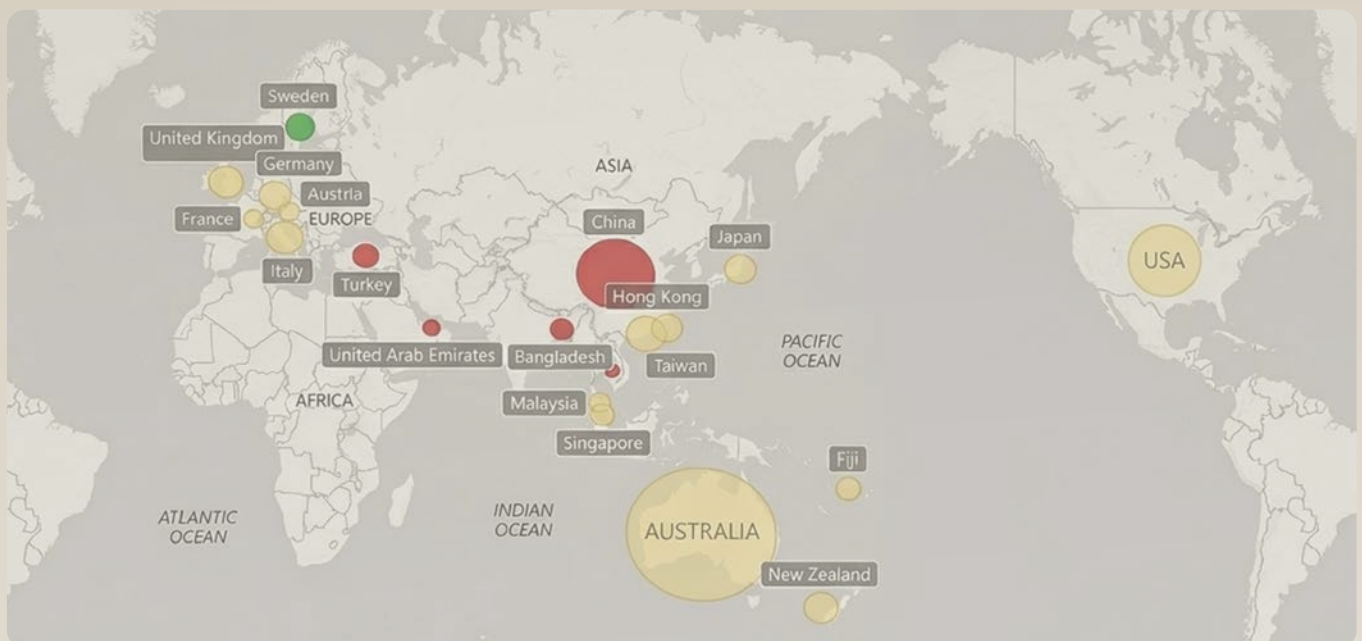
27%

SAQs identified critical and high risk flags for supplier action

52%

of audits identified business critical and critical issues*.

OUR SUPPLIERS SOURCE GOODS FROM:



***Business Critical:** A breach of a code item or local law which presents an imminent or serious risk to life and limb, or which constitutes a severe human rights impact that could be difficult or impossible to remedy.

Critical: A systemic, deliberate or severe breach of a code item or local law which represents a danger to workers or others, or which denies a basic human right; An attempt to pervert the course of the audit through fraud, coercion, deception or interference with the audit process.



4.2 ACAN PREQUALIFIED SUPPLIER DIRECTORY

The ACAN Prequalified Supplier Directory is a searchable list of preferred suppliers that meet expectations of the ACAN Program. This directory was launched in 2023, together with a decision tree, training material and capacity building for small suppliers.

Over time, the Prequalified Supplier Directory will become an important tool for sourcing ethical products and services across Catholic member organisations. Maintaining a strong emphasis on supplier engagement will remain a key focus for the ACAN Program in 2026.

2025 ACAN PRE-QUALIFIED DIRECTORY - SUPPLIER STEPS

- Designate a contact in your business for modern slavery and send their contact details to: suppliers@acan.org.au
- Complete the ACAN Supplier survey (5-6 mins).
- Complete ACAN e-learning (10 minutes) and record your completion using your Australian Business Number (ABN) on the ACAN training certificate register at the end. You must watch all videos and click on all interactive elements.
- If requested, join SEDEX as a Supplier Member, connect to relevant Catholic member organisation and complete a Self-Assessment Questionnaire (SAQ). The SEDEX Helpdesk can provide onboarding support.
- Complete a Consent form to be added to the ACAN Prequalified Supplier Directory contact: info@acan.org.au



4.3 Domus 8.7 - Modern Slavery Remediation Service

Domus 8.7 was established as an agency of the Catholic Archdiocese of Sydney in 2020 as a key element of the ACAN Modern Slavery Risk Management Program. This collaborative approach to remediation is aligned with the Modern Slavery Act and Catholic Social Teaching which are centered on the needs, wellbeing and empowerment of people impacted.

Domus 8.7 provides:

- resources that enable us to listen to workers (grievance channel)
- a 24/7 careline for workers on our sites, staffed by professional counsellors
- direct support to people impacted by forced labour
- guidance and technical assistance to prevent, identify and remediate worker exploitation
- a documented process to assess if an organisation has caused, contributed or is directly linked to forced labour indicators

Domus 8.7 empowers people impacted by modern slavery to have choice and control over what forms of remediation are meaningful to them and to engage safely with business/supply chain actors. Supports may include:

- modern slavery indicator assessment
- needs assessment, case coordination, response and remediation planning
- referrals to community, social services, unions
- transport, accommodation, financial and food support
- legal support, referrals, accompaniment and advocacy
- job training, retraining and redeployment
- accompaniment and advocacy to engage with government and law enforcement agencies
- opportunities to contribute lived expertise to improve modern slavery responses

Domus 8.7 is a registered charity with the Australian Charities and Not-for profits Commission and is an endorsed Public Benevolent Institution with Deductible Gift Recipient status.

BUSINESS AND INDUSTRY PRACTICES DRIVING RISK, REPORTED BY WORKERS TO DOMUS 8.7:



Reliance on labour hire and / or subcontracting



Reliance on temporary or migrant workers



Non-unionised workforce



Remote work and / or living location



Low cost / margin industry

RISK FACTORS REPORTED BY WORKERS TO DOMUS 8.7:



Homelessness



Language and literacy barriers



Lack of social support



Gender



Temporary visa



No work rights or valid visa



Unaware of rights



Debt



Power imbalance and dependence



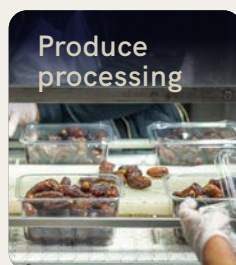
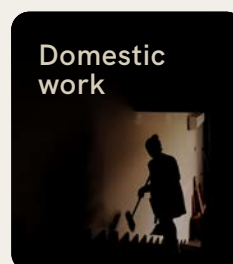
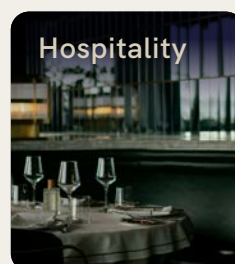
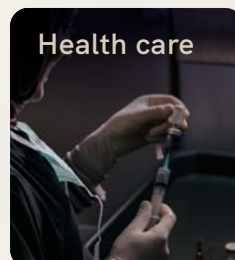
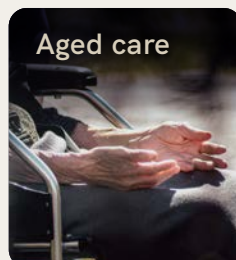
Poverty or no income

65
contacts

706
workers impacted

1536
hours of direct
engagement
with workers

Industries:



Indicators reported by workers:

- Deceptive recruiting
- Debt bondage
- Little or no pay
- Limited or no access to bank accounts and / or bank account controlled by someone else
- Withholding of passport, identity documents, property or finance as a means of control
- Restrictions on movement and access to community support
- Forced labour
- Retaliation as a result of complaints
- Threats of arrest, deportation, abuse of legal process and worsening of working conditions
- Threats of violence and physical violence

DOMUS
8.7



SCAN THE QR
CODE TO VISIT
THE WEBSITE.

5 Measuring Effectiveness

5.1 Baseline Data

The ACAN baseline data table is an important measure of effectiveness of ACAN Program activities. Aggregated supplier engagement data provides a useful measure to track progress and illustrate levels of engagement with suppliers and actions taken.

	ACTIVITY	2022	2023	2024	2025
INTERNAL / STAFF	Catholic member organisations	50	50	52	59
	Hours spent on modern slavery activities	23,955	25,681	22,237	21,536
	Individual staff completed e-learning	6,809	5,430	6,402	11,893
	E-learning modules completed	7,106	9,938	9,580	11,614
EXTERNAL / SUPPLIER ENGAGEMENT	Total number of suppliers	156,433	166,215	180,178	186,836
	Number of suppliers across high-risk categories	46,369	45,534	56,612	57,607
	Number of ACAN Supplier Surveys completed	1,235	2,181	3,255	8,629
	Supplier staff attending webinars	430	1,228	669	96
	Invited to join Sedex	1,535	1,403	817	2,998
	Joined Sedex	364	909	318	547
	Sedex SAQ completed	97	245	213	355
	Social audits	9	50	38	31
	Corrective actions	220	194	138	263
	ACAN Newsletter total opens	15,282	24,433	44,821	39,142
	ACAN Newsletter total engagement	4,309	8,008	17,885	4,938

Cumulative Metrics (2020 to 2025)

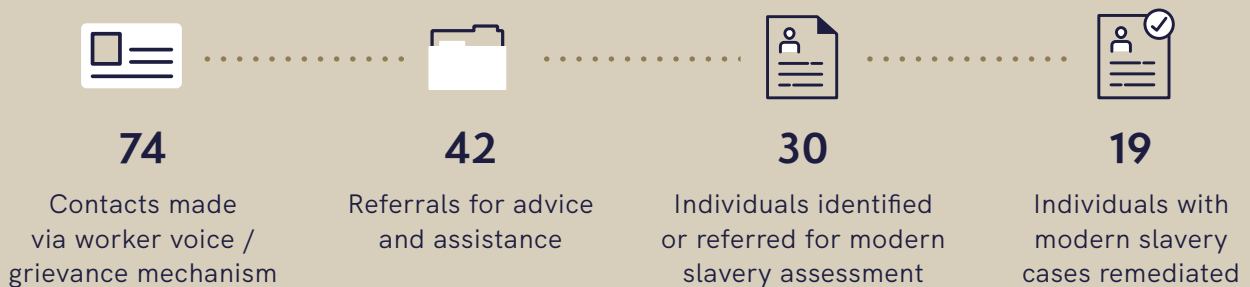
INTERNAL STAFF



EXTERNAL SUPPLIER ENGAGEMENT



DOMUS 8.7 EXTERNAL REFERRALS





6 Index of Modern Slavery Statements

ENTITY NAME		ABN
ACT		
1	Catholic Education Canberra Goulburn	47824127996
NSW		
2	Catholic Archdiocese of Sydney	72 823 907 843
3	Catholic Cemeteries + Crematoria	54281755117
4	Catholic Education Diocese of Bathurst	73470086952
5	Catholic Education Diocese of Wagga Wagga	36345537994
6	Catholic Education Diocese of Wollongong	67786923621
7	Catholic Schools Armidale	90702916776
8	Catholic Schools NSW	46619593369
9	Catholic Schools Parramatta Diocese	86875623906
10	Diocese of Lismore Catholic Schools	93638070836
11	Diocese of Maitland-Newcastle Catholic Schools	62089182027
12	St Vincent de Paul Society NSW	91161127340
13	Sydney Catholic Schools	26158447082
NT		
14	Catholic Education Northern Territory	22616685167
QLD		
15	Catholic Archdiocese of Brisbane	25328758007
16	Catholic Education Diocese of Rockhampton	21528592597
17	Ozcare	58072422925
18	Southern Cross Care QLD	65104033471
19	St Vincent de Paul Society QLD	14211506904
SA		
20	Catholic Archdiocese of Adelaide	29608297012
TAS		
21	CatholicCare Tasmania	79 984 899 862
22	Catholic Education Tasmania	55210770582
23	Loreto Community Housing	23 154 824 969
24	Southern Cross Care Tasmania	18773507851
25	St Joseph Affordable Homes	96 397 668 255

ENTITY		ABN
VIC		
26	Catholic Archdiocese of Melbourne	64047619369
27	Catholic Education Sandhurst	94643894384
28	Diocese of Ballarat Catholic Education	68629894686
29	Diocese of Sale Catholic Education	91621266993
30	Victoria Catholic Education Authority	92119459853
31	Villa Maria Catholic Homes	32004364103
WA		
32	Catholic Education Western Australia	47634504135
33	MercyCare WA	31098197490
34	Southern Cross Care WA	55046572944
MULTI-STATE		
35	Australian Catholic University	15050192660
36	Cabrini	42624828306
37	Calvary Health Care	11079815697
38	Catholic Healthcare	69064946318
39	Dominican Education Australia	54610124322
40	Edmund Rice Education Australia	96372268340
41	MacKillop Family Services	79078299288
42	Marist Schools Australia	76654014794
43	Mater	83096708922
44	Mercy Education	69154531870
45	Mercy Health & Aged Care	89614115856
46	Southern Cross Care NSW & ACT	76131082374
47	St John of God Health Care	21930207958
48	St Vincent's Health Australia	75073503536
49	University of Notre Dame Australia	69330643210



AUSTRALIAN CATHOLIC
**ANTI-SLAVERY
NETWORK**

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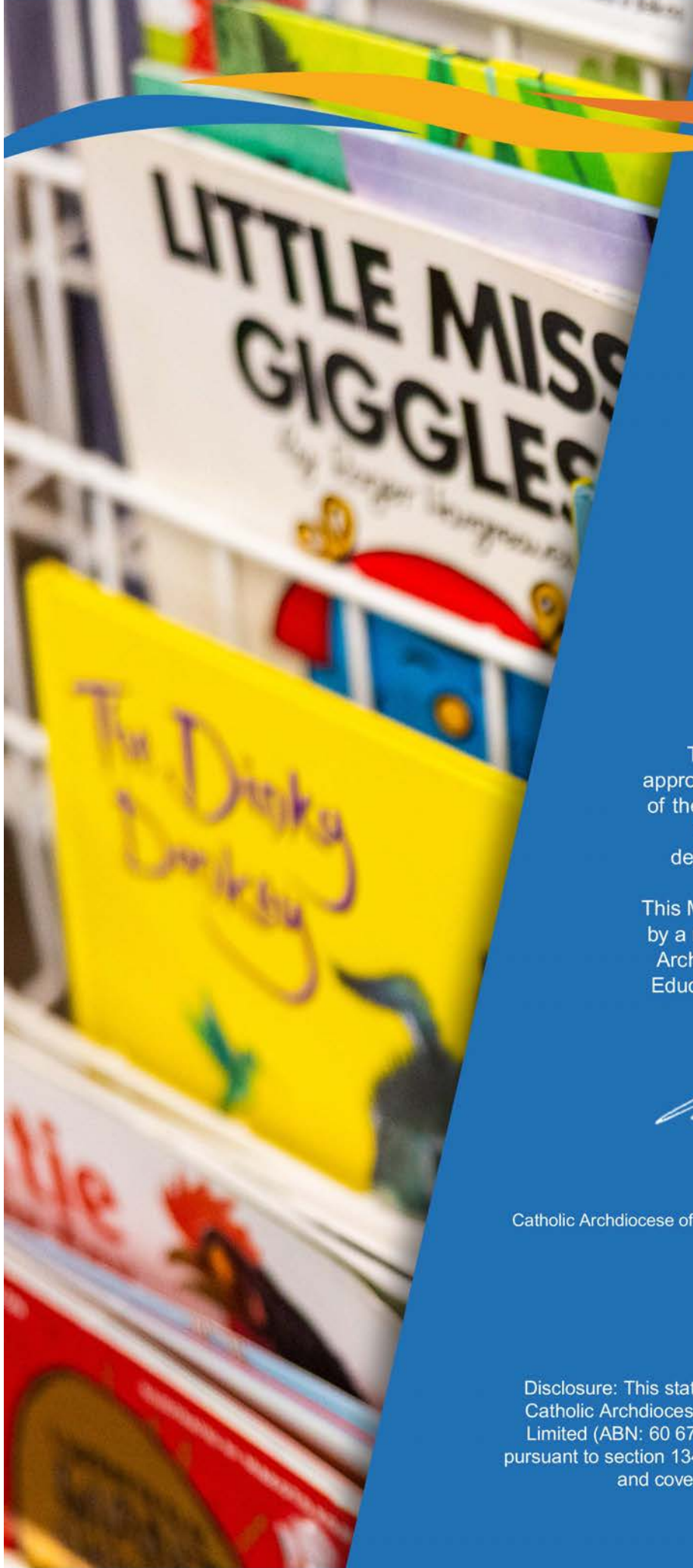
CATHOLIC EDUCATION
Archdiocese of Canberra & Goulburn

MODERN SLAVERY

Statement 2025

**Catholic Archdiocese of Canberra
and Goulburn Education Limited**

55 Franklin Street, Manuka ACT 2603
cg.catholic.edu.au | mslo@cg.catholic.edu.au



Approval

This Modern Slavery Statement was approved by the principal governing body of the Catholic Archdiocese of Canberra and Goulburn Education Limited as defined by the Act on 26 March 2026.

This Modern Slavery Statement is signed by a responsible member of the Catholic Archdiocese of Canberra and Goulburn Education Limited as defined by the Act.



Patrick McArdle

Chair

Catholic Archdiocese of Canberra and Goulburn Education Limited
26 March 2026

Disclosure: This statement has been produced on behalf of Catholic Archdiocese of Canberra and Goulburn Education Limited (ABN: 60 675 797 734). This statement is prepared pursuant to section 134 of the Modern Slavery Act 2018 (Cth) and covers CACGEL as a single reporting entity.

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Criteria 1 and 2: About us

Extending from Pambula on the south coast, to Crookwell in the North, through to the western point of Lake Cargelligo, the Archdiocese of Canberra and Goulburn covers both the ACT and NSW, a total of 88,000 square kilometres.

There are 56 System Schools and 9 Catholic Early Learning Centres in the Archdiocese:

ACT

24 primary schools
5 secondary colleges
9 early learning centres
3 school aged care services

NSW

19 primary schools
3 secondary colleges
2 K-10 schools (central schools)
3 K-12 schools



Our Catholic School System educates 23,000 students.*



We have 4,522 teachers and supporting staff across the System.*



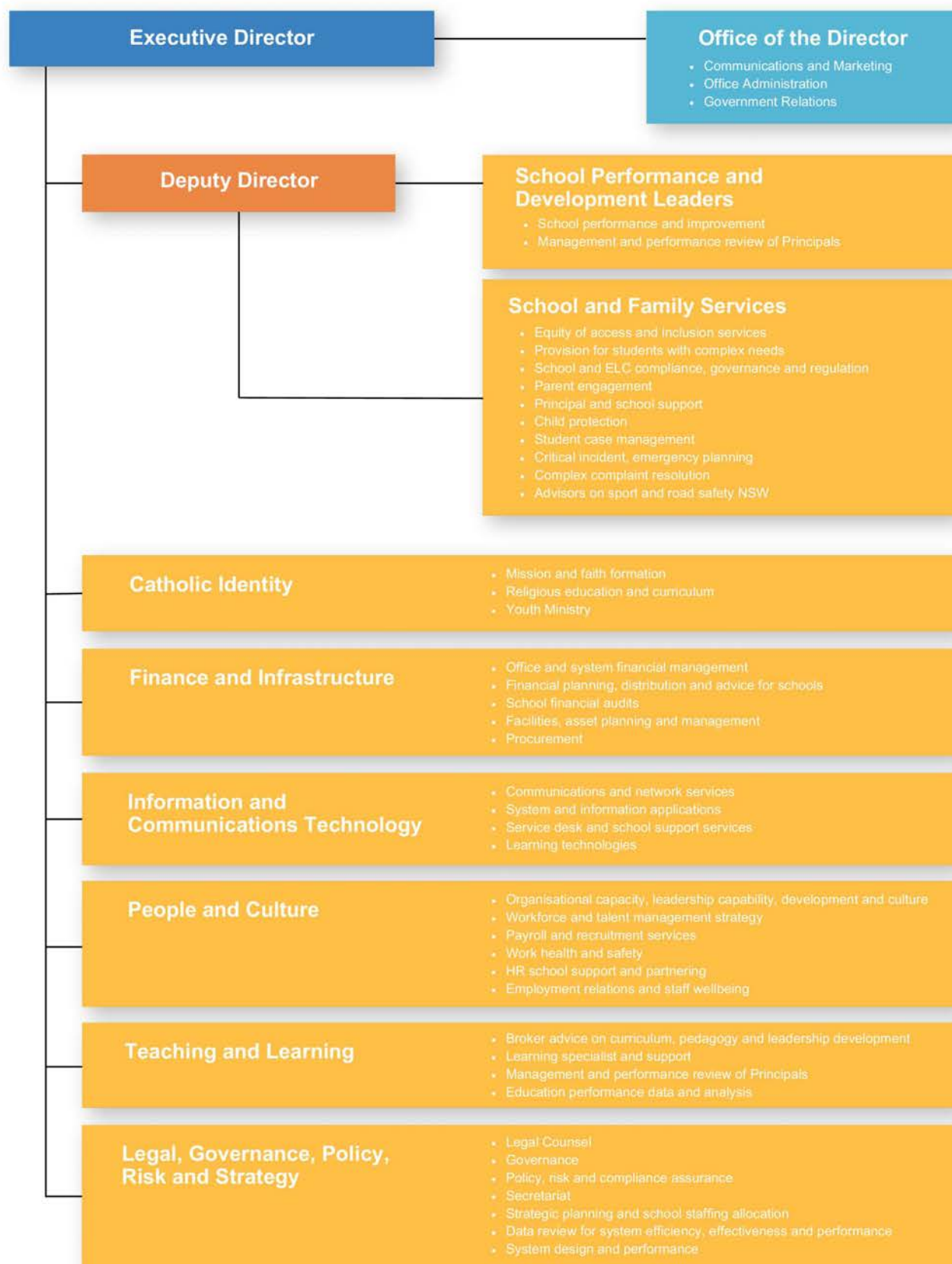
We invite you to discover our schools and to acquaint yourselves with all that Catholic Education in the Archdiocese of Canberra and Goulburn has to offer.

* As of November 2025

We provide services in:

- Spirituality and Pastoral Care
- Education Information and Advice
- Administrative Advice and Information
- Human Resource and Other Services
- Financial Administration
- Planning and Facilities
- ICT Services
- Reporting
- Quality Control
- Advising and reporting to the Catholic Education Commission
- School Services

Organisation overview



Our workforce profile

Workforce cohort	FTE	Headcount
CEO		
CEO	194	203
Casual	-	11
Board	-	22
ACT SCHOOLS		
Teacher	1155	1271
Learning Support	236	396
Other	175	216
Casual Teacher	-	241
NSW SCHOOLS		
Teacher	647	740
Learning Support	142	240
Other	88	132
Casual Teacher	-	267
EARLY LEARNING CENTRES (ELC)		
ELCs	116	135
ELC Casual	-	97
CACGEL SYSTEM		
General Casual system wide	194	551
TOTAL		
	2753	4522

Data as at November 2025



4,522

Total headcount including casual employees

2,753

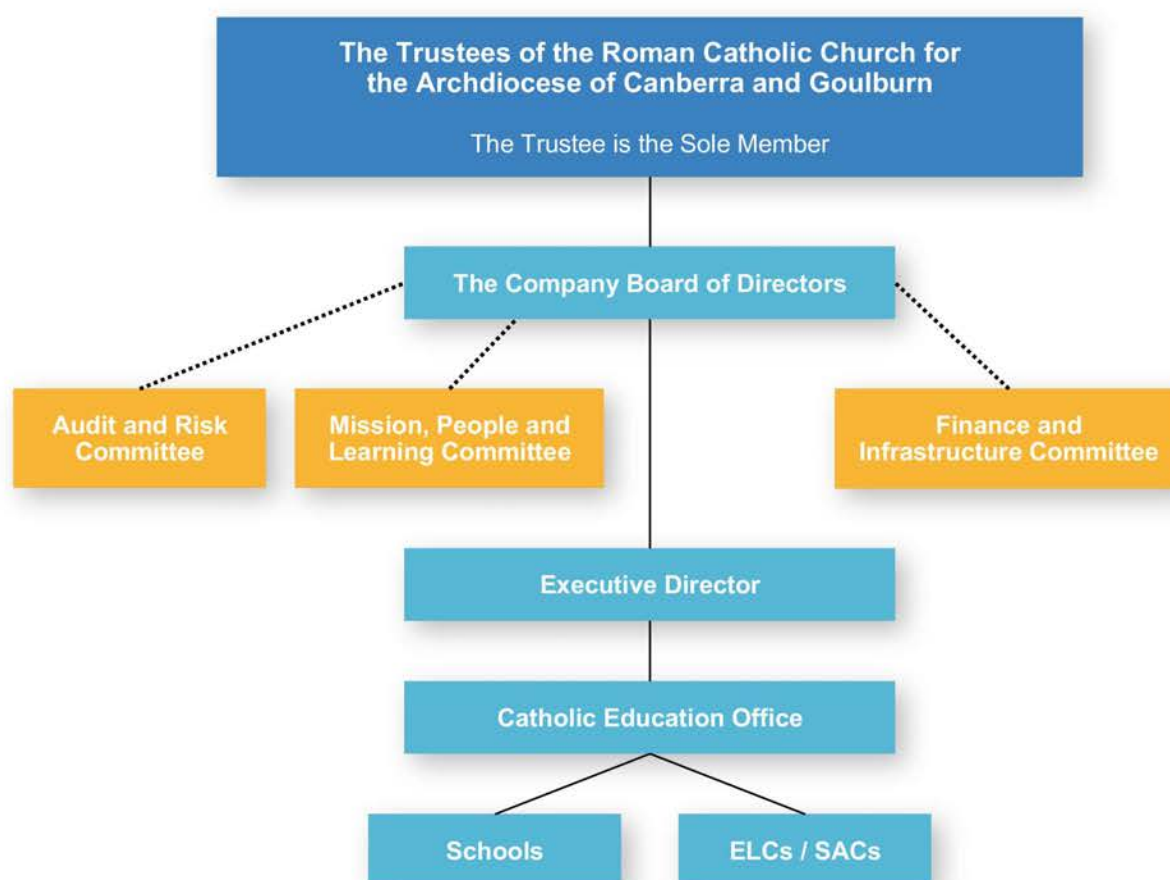
FTE excluding casuals, Board, committee members, contractors and non-paid workers

Our governance framework

The Catholic Archdiocese of Canberra and Goulburn Education Limited Governance Framework is based on delegation, accountability and oversight to support sound and prudent decision-making across all areas of the company, including:

- Strategic and operational planning
- Culture, purpose, values, and conduct
- Risk management and compliance
- Educational outcomes
- Financial management
- External reporting
- People and remuneration.

The following diagram shows the key components of CACGEL's governance framework.



The Sole Member

The sole Member of the Company is the Trustees of the Roman Catholic Church for the Archdiocese of Canberra and Goulburn – a body corporate established pursuant to the Roman Catholic Church Trust Property Act in the ACT. The Trustees, as the body corporate, are comprised of the Archbishop and his consultors.

The Member is the owner of CACGEL and is responsible for:

- The appointment and removal of the Chair of the Board
- The appointment and removal of the Deputy Chair of the Board
- The appointment and removal of Directors of the Board
- Approval of any amendments to the Company's constitution and has the authority under the constitution to dissolve the Company.
- Appointment and removal of an external auditor
- Approval of the Director's Code of Conduct

The Member has the authority to take a number of actions under the constitution, either solely or often following mutual consultation with the Board.

The Board of Directors is required to report to the Member.

Board of Directors

The Board guides the strategic direction of the Company. The roles and responsibilities of the Board, including the matters that are specifically reserved to the Board and those delegated to management, are set out in the Board Charter.

The Board delegates certain powers to Board Committees to help the Board fulfil its roles and responsibilities. Committee roles and responsibilities are set out in the respective Committee charters and Board Committee Operating Rules.

The Board has delegated management of CACGEL to the Executive Director of Catholic Education. Except for any specific powers reserved by the Board, or matters specifically delegated by the Board to others, the Executive Director of Catholic Education may make all decisions and take any necessary action to carry out the day-to-day management and operations of the CACGEL. The Executive Director is accountable to the Board in exercising this delegated authority.

The Board as a whole is collectively responsible for the success of CACGEL, and the role of the Board is to:

- Act always to promote and achieve the evangelising mission of CACGEL and the objects of CACGEL as articulated by the Member and set out in the Constitution.
- To ensure the good of those entrusted to the care of the Company is paramount in all activities of the Company.
- Promote the long-term sustainable success of CACGEL, generating value and contributing to the wider community.
- Establish the CACGEL's purpose, values and strategy and satisfy itself that these and its culture are aligned.
- Act with integrity, lead by example and promote the desired culture.
- Ensure that the necessary resources are in place for the CACGEL to meet its objectives and measure performance against them.
- Establish a framework of prudent and effective controls, which enable risk to be assessed and managed.
- Ensure effective engagement with, and encourage participation of, internal and external Partners and collaborators.
- Ensure that policies and practices are consistent with CACGEL's values and support its long-term sustainable success.

Board advisory committees

Audit and Risk Committee

Committee purpose

Supports the Board with overseeing the integrity of accounting and financial statements and the financial, regulatory, and corporate reporting processes of the company, the Internal Audit function and the external auditor.

The Committee also supports the Board with oversight of the Company's risk profile, Risk Management Framework (covering financial, non-financial and emerging risks), material risks, risk mitigation practices, adherence to Board approved risk appetite and internal compliance and control systems, while guiding management's promotion and maintenance of a risk-based culture.

Areas of focus

- **Financial statements:** overseeing the integrity of the Company's accounting and financial statements, including compliance with accounting standards and policies.
- **Reporting:** overseeing the integrity of the Company's financial, regulatory, and corporate reporting processes.
- **Audit results:** reviewing key internal and external audit findings and insights.
- **Auditor performance and independence:** overseeing the performance and independence of Internal Audit and the external auditor, including review of the adequacy of internal and external audit plans and resourcing.
- **Risk appetite:** reviewing and overseeing the Company Risk Appetite Statement and Risk Management Strategy, covering existing and emerging financial and non-financial risks.
- **Compliance culture:** continued focus on regulatory and legislative requirements and the controls and compliance environment to monitor adherence and shortcomings.
- **Controls environment:** continued review of the health and transformation of controls.
- **Audit matters:** reviewing key internal audit findings and insights, including monitoring management's response to matters raised.
- **Technology:** reviewing updates relating to the technology risk profile, technology resilience, and cyber risks.

Membership

Chair: Ms Liesl Centenera

Deputy Chair: Dr John Norgrove

Members: Mr Wayne Evans, Ms Melissa Petropulos, Mr Adam Henry

Board advisory committees

Mission, People and Learning Committee

Committee purpose

The Committee serves as a critical advisory body to the Board and supports the Board in fostering an environment that attracts, retains, and develops talented staff, maintains educational excellence, and upholds the Company's Catholic mission and values.

Areas of focus

- **People and Culture:** Oversee the Company's people and culture resources strategies and policies, ensuring alignment of staff capabilities with the company's values and strategic objectives. Monitor and advise on Company culture and employee engagement
- **Mission:** Safeguard and promote Catholic ethos and mission within the education system, ensuring that the Company's activities align with its core Catholic values and principles.
- **Education:** Provide strategic guidance on educational matters and policies. Monitor the quality and effectiveness of educational programs and advise on emerging trends and best practices in education.
- **Performance Management:** Assist in developing and implementing performance outcomes for the Executive Director and Management.
- **Governance:** Ensure compliance with relevant educational and employment regulations and oversee the implementation of the Company's Reconciliation Action Plan and other social responsibility initiatives.
- **Reporting:** Provide regular reports to the Board on people-related matters, educational performance, and mission-aligned initiative.

Membership

Chair: Mr Graham Pollard

Deputy Chair: Ms Mary Dorrian

Members: Ms Jessica Del Rio, Ms Chloe Kelly, Mr Frank Chiment, Dr Phil Pettit, Ms Carolyn O'Neill, Ms Joanna Quick.

Board advisory committees

Finance and Infrastructure Committee

Committee purpose

The Committee aims to support the Board in maintaining financial stability, ensuring prudent resource allocation, and developing sustainable infrastructure to support the Company's educational mission and long-term growth objectives.

Areas of focus

- **Financial Oversight:** Monitor the organisation's financial performance and position. Review and recommend annual budgets and financial plans. Oversee and provide financial reporting processes and ensure compliance with accounting standards.
- **Capital Management:** Advise on capital allocation strategies. Review and recommend capital expenditure proposals. Monitor the Company's liquidity and funding arrangements
- **Infrastructure Planning:** Oversee the development and implementation of long-term infrastructure strategies. Review and recommend major infrastructure projects. Ensure alignment of infrastructure plans with educational needs and Company growth
- **Technology Integration:** Advise on technology investments related to financial management and infrastructure. Ensure alignment of technology plans with financial and infrastructure strategies
- **Compliance and Governance:** Review and recommend policies related to financial management and infrastructure
- **Reporting:** Provide regular reports to the Board on financial performance, capital management, and infrastructure projects.

Membership

Chair: Mr Peter Mullins

Deputy Chair: Ms Helen Delahunty

Members: Mr Jim Corrigan, Mr Tim Cook



Catholic School Parents

Archdiocese of Canberra and Goulburn

Catholic School Parents Archdiocese of Canberra and Goulburn (CSAPCG), launched in 2014, is recognised by the Archbishop as the peak body representing the interests of all Catholic school families in the Archdiocese of Canberra and Goulburn.

CSPACG meets quarterly to discuss topics of interest to families within the Archdiocese and is frequently called on to provide parent perspective on issues that affect Catholic school families.

CSPACG contributes to the work of State and National parent councils who are called upon by government and various partners and collaborators for input into discussions around current topical issues.

Our operations

CACGEL's core function is to provide education to its 23,000 students across 56 schools and 9 Early Learning Centres and 3 School Aged Care Services supported by 4,522 staff members across CACGEL.

CACGEL's schools are spread across 88,000 square kilometres and operate both in suburban communities in the ACT as well as regional communities in NSW. For compliance and state related issues, each site complies with either ACT or NSW regulations, based on its location. However, all schools are a part of the Canberra Goulburn Archdiocese.

The high-level services provided through the central office include, but are not limited to:

- Education Information and Advice
- Financial Administration
- Human Resources and other services
- Capital Planning and Facility Maintenance
- ICT Services
- Reporting and Quality Control



Our supply chain

During the reporting period, CACGEL maintained commercial relationships with 5,949 suppliers across its operations. While certain procurement functions have been consolidated under central management, ongoing efforts continue to transition the majority of purchasing activities to centralised oversight and governance structures. CACGEL's procurement portfolio is characterised by a substantial proportion of short duration, flexible contractual arrangements that may be administered either at the individual school level or at the System wide level, depending on their nature, value, and strategic significance.

CACGEL's approach to contract management follows a tiered structure:

System Level Contracts: Higher value engagements with significant strategic importance are typically managed through the central office, including design services, construction projects, and professional consulting arrangements. These contracts benefit from centralised expertise, standardised terms, and enhanced oversight capabilities.

School Level Contracts: Lower value arrangements with more localised operational focus have historically been managed at the individual school level, encompassing services such as waste management, routine maintenance, and similar functions. These categories are progressively transitioning to centralised management as part of CACGEL's broader procurement reform strategy.

Throughout the CACGEL network, individual schools retain considerable decision making authority regarding supplier selection for short term, lower-value contractual arrangements. This decentralised autonomy provides schools with the operational flexibility necessary to respond effectively to their unique community needs and deliver services in ways that best align with local contexts and priorities. However, this autonomy presents challenges: System-wide contracts that necessitate subcontractor engagement in regional and remote locations may introduce elevated modern slavery vulnerabilities due to reduced visibility and oversight in these extended supply chain networks.

Recognising that CACGEL schools procure largely similar goods and services with only minor variations based on local requirements, CACGEL is actively identifying additional procurement categories that would benefit from enhanced coordination and centralisation.

Consolidating these categories under System level contracts offers multiple advantages for schools, including minimised administrative burden and distraction from core educational activities, substantially reduced modern slavery risk exposure through improved supplier vetting and monitoring, and enhanced cost efficiency through economies of scale and improved negotiating leverage.

Several procurement categories have already been successfully coordinated across the entire System and are now managed through central office oversight, including electricity supply contracts, security services provision, and fire safety compliance services. These implementations serve as models for future centralisation initiatives.

Criteria 3: Modern slavery risks in operations and supply chain

For Catholic entities such as CACGEL, modern slavery risks are defined by the ACAN Category Risk Taxonomy, a classification standard that identifies severity of actual or potential harm to people (saliency) in spend categories.

The ACAN Category Risk Taxonomy is based on sources such as:

- the Global Slavery Index
- the International Labor Organisation (ILO), including definitions of modern slavery
- the Bureau of International Labor Affairs (ILAB), U.S Department of Labor
- the Global Child Forum and UNICEF

Five key factors are also used to determine the level of risk:

- Geography: the country or location where a good is made or service is delivered
- Industry: the sector in which the making of goods or delivery of service occurred
- Commodity: the raw materials or components that comprise the goods or products
- Workforce vulnerability: such as bonded visas, temporary migrants, women or children known to be employed in specific industry sectors
- Domus 8.7: trends, cases, and risk intelligence identified through the Domus 8.7 remediation service, including grievances and remediation insights relevant to category and risk to workers.

High risk	Medium risk	Low risk
• Building and construction • Cleaning and Security • Events and event management • Facility management and property maintenance • Finance and Investment • Food and catering services • Furniture and office supplies • ICT Hardware • ICT Software and network services - offshore • Labour Hire • Linen, laundry and textile products • Medical devices and supplies • Transport, logistics and warehousing • Uniforms and PPE • Waste management services	• Advertising and Marketing • ICT Software and network services - onshore • Utilities • Fleet management, consumables and maintenance • Travel and accommodation • Print / Mail Provider	• Professional services • Financial expenses • Government and agency fees • License / membership fees

*Note: Pastoral and Payroll (excluding labour-hire and sub-contracting are not in scope of the ACAN Risk Taxonomy

Risk taxonomy

The data in the tables below is a breakdown of the total value of payments as a total value and number of CACGEL's high risk suppliers.

	Total	High Risk
CACGEL Supplier Spend	\$142.8M	\$75.8M
Number of Suppliers	5949	676

Percentage of spend in high-risk categories:

Category	Spend Description	\$ Spend (M)	% of Spend
Building and construction	Building materials (e.g. concrete, steel, timber, plaster products, glass, plastics, quarried stone etc) sub-contracting and labour hire services, demolition, painting and landscaping.	20.5	14.4
Cleaning and security services	Sub-contracting and labour hire services, chemicals and cleaning products, security equipment (radios, torches, pouches, bags etc) PPE, uniforms and footwear.	4.5	3.2
Clothing Uniforms and PPE	Uniforms (workwear, school wear, sportswear), footwear and PPE (e.g. gloves, face masks or respirators, glasses / goggles, ear muffs, safety workwear etc)	0.3	<1
Facility management and property maintenance	Hard and soft services including minor repairs, plumbing and septic, utilities management, building operations, HVAC, landscaping and yard work, removalists, cleaning and janitorial, security and patrols	18.7	12.7
Furniture and office supplies	General office suppliers, stationery, paper products, small office machines, (not computers or peripherals), labels, ink, toner, furniture (chairs, tables, workstations, filing cabinets, shelves, racks etc), workplace suppliers (cleaning, first aid, bathroom etc), packaging, boxes etc	0.5	<1
Food and Catering Services	Sub-contracting and labour hire services	1.5	1.1
ICT	According to the 2018 Global Slavery Index (GSI), electronics are the highest risk product for modern slavery in supply chains. The report also highlights that the most at-risk electronics imported to Australia are from China and Malaysia. Forms of modern slavery identified by the GSI and other reports as being present in the electronics sector include passport retention or doctoring of identity documents, restriction of freedom of movement, poor living conditions, underpayment, fines and illegal salary deductions, excessive working hours and unpaid overtime.	16.8	11.8
Labour Hire	Outsourcing of workers through third-party agencies, which can create risks of exploitation, forced labour, and deceptive recruitment practices	4.9	3.5
Recruitment and Labour Hire	Wide range of traditional low-skilled / low paid work	0.6	<1
Waste management services	Recycling, processing, transport, hazardous waste, special waste streams, PPE, vehicles, bin manufacturing	0.6	<1
Finance and Investment	Funds are allocated to entities or projects that fail to conduct adequate due diligence on supply chains, potentially enabling or indirectly supporting exploitative labour practices.	6.7	4.7

Recognising that CACGEL schools procure largely similar goods and services with only minor variations based on local requirements, CACGEL is actively identifying additional procurement categories that would benefit from enhanced coordination and centralisation.



Delivering education supply chain

Higher risk suppliers



Lower risk suppliers



Criteria 4: Actions taken to assess and address risk

2025 Modern Slavery Risk Management Initiatives

Over the past five years, the company has undertaken a comprehensive centralisation initiative as a cornerstone of its Modern Slavery mitigation program. Historically, individual schools operated with decentralised procurement autonomy, resulting in engagements with tens of thousands of suppliers and minimal central oversight or governance. This fragmented approach limited visibility into supply chain risks and hindered the organisation's ability to effectively monitor compliance with ethical standards.

To address these challenges, CACGEL has implemented strategic reforms across multiple procurement categories. The majority of purchasing activities now operate under enhanced central oversight, facilitated by upgraded financial management platforms that provide greater transparency and control. Particular emphasis has been placed on centralising services within high risk industries known to present elevated modern slavery vulnerabilities.

Key centralisation achievements include the consolidation of cleaning services, office supplies, and ICT hardware procurement. These initiatives have been supported by the implementation of standardised contractual clauses that explicitly incorporate modern slavery mitigation requirements. CACGEL has established comprehensive supplier screening and monitoring processes encompassing: payment accuracy verification, compliance with award wage mechanisms, validation of contractual terms and conditions, ongoing supplier reporting obligations, on-demand verification of worker visas, confirmation of right to work documentation, and systematic payslip audits to ensure workers receive proper remuneration. Building on this foundation, CACGEL achieved significant additional milestones in 2025:

Recruitment services

Established a preferred supplier panel for recruitment services, underpinned by enhanced contractual frameworks that mandate strict compliance with right to work documentation verification and other ethical recruitment practices. This approach ensures that temporary and permanent staff placements adhere to the highest standards of worker protection.

Travel services

Travel Services: Transitioned to a single, integrated portal for all travel bookings, significantly increasing transparency and oversight in this category. This consolidation enables more effective monitoring of travel service providers and reduces potential risks associated with fragmented supplier relationships.

ICT hardware

CACGEL has centralised its Device as a Service (DaaS) provision for staff across the organisation, consolidating the procurement and management of ICT hardware under a single, coordinated framework. This centralisation addresses significant modern slavery risks inherent in the electronics and technology supply chain, where the extraction of raw materials such as cobalt, lithium, and rare earth minerals, as well as device manufacturing and assembly processes, have been linked to forced labour, child labour, and exploitative working conditions in various regions globally. By transitioning to a centralised DaaS model with vetted preferred suppliers, CACGEL has enhanced its ability to conduct due diligence, require supply chain transparency, and enforce contractual obligations that mandate ethical sourcing and manufacturing practices. This approach ensures consistent standards across all staff technology provision while substantially reducing CACGEL's exposure to modern slavery risks within the electronics sector.

These progressive centralisation measures have transformed CACGEL's procurement landscape, establishing robust frameworks for modern slavery risk identification, prevention, and remediation across the organisation's supply chains.



Our plans for 2026 and beyond

CACGEL remains committed to advancing our centralisation strategy, recognising that several critical service categories continue to operate under decentralised models that present ongoing risk management challenges. Among our network of 56 schools, there is strong System support for centralising school uniform procurement, an initiative driven not only by financial efficiency and quality assurance objectives, but more importantly, by significant ethical supply chain considerations.

The current decentralised approach to uniform and clothing procurement creates substantial modern slavery risk exposure. Specifically, the garment and textile industry presents well documented supply chain vulnerabilities, including the sourcing of raw materials such as cotton from China's Xinjiang Uyghur Autonomous Region, where credible evidence from international human rights organisations, Australian government reports, and investigative journalism has documented forced labor practices affecting the Uyghur population and other ethnic minorities. Furthermore, garment manufacturing frequently occurs in developing nations where supply chains lack transparency, creating opaque networks that give rise to genuine and elevated risks of modern slavery, forced labor, and exploitative working conditions for vulnerable workers.

In 2026, CACGEL will commence a program to centralise school uniform procurement with the following objectives:

- ✓ **Supply Chain Transparency:** Establish a supplier vetting processes that include full supply chain assurance from raw material sourcing through to final product delivery.
- ✓ **Ethical Sourcing Standards:** Implement mandatory contractual requirements prohibiting the use of materials sourced from high risk regions and requiring third-party verification of ethical labor practices.
- ✓ **Traceability Mechanisms:** Require suppliers to provide documented evidence of material origins and manufacturing locations throughout the supply chain. This initiative represents a significant step forward in CACGEL's modern slavery mitigation efforts, addressing one of the highest risk procurement categories while delivering improved value and quality outcomes for our school communities.

CACGEL maintains an ambitious long term objective: the complete eradication of modern slavery risks throughout its entire network of service providers and supply partners. This comprehensive goal encompasses even the most intricate and multi-tiered supply chain structures that span the wide array of industries upon which CACGEL relies to provide quality educational services to students and school communities.

Our vision serves as the foundation for our continued dedication to upholding ethical standards and fulfilling our broader social responsibility obligations. By pursuing this goal, CACGEL strives to ensure that every community we serve benefits from an operational framework built upon principles of fairness, equity, and fundamental human dignity. CACGEL recognise that achieving this aspiration requires persistent effort, continuous improvement, and unwavering commitment to identifying and addressing exploitation risks at every level of our procurement and service delivery ecosystem.

Through this approach, CACGEL seeks to create lasting positive impact within our immediate operations and throughout the extended networks of workers, suppliers, partners and collaborators who contribute to our educational mission. Our aspiration extends beyond regulatory compliance, reflecting a genuine commitment to fostering supply chains that respect and protect the rights and wellbeing of all workers involved in supporting our educational objectives.

Actions taken throughout the reporting period

1. Monthly meeting of CACGEL's Modern Slavery Working Group (MSWG)

In 2020, CACGEL established a Modern Slavery Working Group (MSWG) comprised of key personnel from across the organization, drawing expertise from risk management, procurement, finance, and project delivery functions. The MSWG operates under formal Terms of Reference and convenes regularly to fulfill the following mandate:

- Deliver expert input and strategic guidance to CACGEL leadership on matters pertaining to modern slavery prevention and remediation;
- Champion the development and execution of CACGEL's modern slavery action framework;
- Support CACGEL in identifying priority interventions and establishing measurable annual objectives and performance targets;
- Conduct ongoing monitoring and evaluation of actions undertaken to identify and address modern slavery risks, assessing their impact and effectiveness; and
- Ensure organisational compliance with all requirements stipulated under the Modern Slavery Act 2018 (Cth).

Throughout the reporting period, the MSWG has served as a critical catalyst, driving CACGEL's commitment to taking substantive, measurable steps toward eradicating modern slavery from its procurement networks and supply chains.

During 2025, the MSWG convened on four occasions, maintaining an active membership of five dedicated participants who contributed their specialised knowledge and oversight to CACGEL's modern slavery mitigation efforts.

CACGEL has appointed a designated Modern Slavery Liaison Officer (MSLO) who serves as chair of the MSWG and functions as the primary point of contact with the Australian Catholic Anti-Slavery Network (ACAN). The MSLO actively engages with ACAN's monthly webinar sessions and leverages ACAN's comprehensive suite of tools, frameworks, and resources, adapting these materials to suit CACGEL's specific operational context and implementation requirements. This partnership ensures CACGEL remains informed of sector best practices and emerging strategies in modern slavery prevention.

2. Travel services centralisation

In 2025, CACGEL achieved a significant milestone in its modern slavery risk mitigation strategy through the complete centralisation of all travel and accommodation bookings across the System. Previously, travel arrangements were made through multiple platforms and providers creating a fragmented procurement landscape with limited visibility into supplier practices and working conditions within the hospitality and travel sectors. This decentralised approach presented inherent challenges in monitoring compliance with ethical standards and identifying potential modern slavery risks, particularly given the well documented vulnerabilities within the hospitality, tourism, and transport industries.

The transition to a single, integrated travel portal has fundamentally transformed CACGEL's capacity to exercise oversight and due diligence in this high risk procurement category. By consolidating all travel and accommodation bookings through one centralised platform, CACGEL has established a comprehensive framework for supplier vetting, monitoring, and accountability. This streamlined approach enables CACGEL to engage with a selected panel of preferred suppliers who have been assessed against modern slavery risk indicators and have committed to enhanced contractual obligations regarding ethical labor practices.



The centralised travel model delivers multiple risk mitigation benefits. First, it provides complete transparency and traceability of all travel related expenditure and supplier relationships, eliminating the visibility gaps that previously existed under decentralised arrangements. Second, it enables CACGEL to leverage consolidated purchasing power to negotiate strengthened contractual terms that explicitly require suppliers to demonstrate compliance with modern slavery prevention measures, including verification of fair wages, reasonable working hours, and safe working conditions for hotel staff, transport workers, and other service providers on demand. Third, the centralised System facilitates systematic data collection and analysis, allowing CACGEL to monitor spending patterns, identify emerging risks, and respond proactively to potential concerns within the travel supply chain should they arise.

This initiative represents a practical demonstration of CACGEL's commitment to addressing modern slavery risks in sectors known for labor exploitation vulnerabilities, including accommodation providers where housekeeping and cleaning staff may face precarious employment conditions, and transport services where workers can be subject to excessive hours and inadequate remuneration. Through centralized oversight, CACGEL can ensure that the travel services supporting our educational mission are delivered by suppliers who share our values and commitment to protecting worker rights and dignity.

3. ICT hardware centralisation

In 2025, CACGEL implemented a comprehensive centralisation of its Device as a Service (DaaS) provision for staff members across the entire organisation, consolidating the procurement, deployment, and lifecycle management of ICT hardware under a unified, strategically coordinated framework. Previously, technology devices were acquired through various channels at both the school and System levels, resulting in engagements with multiple suppliers and limited capacity for comprehensive supply chain oversight in one of the highest risk procurement categories for modern slavery.

This centralisation initiative directly addresses the significant and well documented modern slavery vulnerabilities inherent throughout the global electronics and technology supply chain. The production of ICT devices involves complex, multi-tiered supply networks that span numerous countries and present risks at every stage. These risks include the extraction of critical raw materials such as cobalt, lithium, tin, tantalum, tungsten, and rare earth minerals often sourced from regions where mining operations have been credibly linked to forced labour, child labour, and highly dangerous working conditions. Furthermore, the manufacturing and assembly phases of electronic device production frequently occur in facilities where workers may face excessive working hours, inadequate wages, unsafe conditions, and restrictions on freedom of movement or association.

By transitioning to a centralised DaaS model with a carefully selected panel of preferred suppliers, CACGEL has significantly enhanced its capacity to conduct meaningful due diligence and exercise effective oversight throughout the technology supply chain. The centralised approach enables CACGEL to implement rigorous supplier vetting processes that evaluate not only technical capabilities and pricing but also ethical sourcing commitments, supply chain transparency, and demonstrable compliance with international labour standards. Preferred suppliers are required to provide detailed documentation regarding the origins of raw materials, manufacturing facility locations, and labour practices throughout their supply networks.



Additionally, the centralised DaaS framework allows CACGEL to incorporate strengthened contractual provisions that explicitly mandate ethical sourcing and manufacturing practices. These contractual obligations require suppliers to maintain compliance with conflict mineral regulations, conduct regular audits of manufacturing facilities, ensure fair compensation and safe working conditions for all workers involved in device production, and provide ongoing reporting on supply chain due diligence efforts. Suppliers must also demonstrate mechanisms for identifying and remediating any instances of labour exploitation discovered within their supply chains.

This strategic approach ensures consistent ethical standards across all staff technology provision while substantially reducing CACGEL's exposure to modern slavery risks within the electronics sector. The centralised model also positions CACGEL to respond more effectively to emerging risks and evolving best practices in technology supply chain management, reinforcing the organization's commitment to responsible procurement in high risk categories.

4. Recruitment services centraliation

CACGEL has implemented centralisation of recruitment services establishing a preferred supplier panel for all temporary and permanent staff placements. Previously, individual schools and People and Culture service areas engaged with various recruitment agencies independently, creating a fragmented landscape with inconsistent vetting standards and limited oversight of labour hire practices. This decentralised approach presented substantial modern slavery risks, as the labour hire and recruitment industry has been identified as a sector with elevated vulnerabilities to worker exploitation, including wage theft, excessive fees charged to workers, fraudulent visa arrangements, and coercive employment practices that can constitute modern slavery or slavery-like conditions.

The centralised recruitment model addresses these risks through a comprehensive framework that prioritises ethical recruitment practices and worker protection. All preferred suppliers on the recruitment panel have undergone assessment against modern slavery risk indicators and are bound by enhanced contractual terms that mandate strict compliance with ethical standards. These contractual obligations include requirements for thorough verification of right to work documentation to prevent exploitation of workers with precarious visa status, prohibition of charging fees to workers for placement services, transparent communication of employment terms and conditions, and compliance with all applicable industrial awards and employment regulations on demand. Suppliers must also demonstrate robust processes for conducting background checks on both clients and workers to identify and prevent exploitative arrangements.

By consolidating recruitment services through a vetted supplier panel, CACGEL has established greater visibility and control over the employment conditions of temporary and contract workers engaged across our schools and operations. The centralised approach enables systematic monitoring of recruitment practices, including verification that workers receive appropriate wages, entitlements, and working conditions consistent with their employment classification. CACGEL can now more effectively identify red flags such as workers being charged illegal recruitment fees, being placed in roles that don't match their visa conditions, or experiencing deductions from wages that reduce their pay below legal minimums, all indicators of potential modern slavery or severe exploitation.

Furthermore, the preferred supplier panel model creates accountability mechanisms that were previously absent under decentralised arrangements. CACGEL maintains ongoing communication with panel suppliers, and may undertake 'on demand ' performance reviews that include assessment of ethical recruitment compliance and establish clear escalation protocols for investigating any concerns raised by workers or schools regarding recruitment practices. This proactive oversight ensures that labour hire workers supporting CACGEL's educational mission are protected from exploitation and that CACGEL's engagement with the recruitment industry upholds the highest standards of worker dignity and rights. The centralisation of recruitment services represents a critical step in CACGEL's broader strategy to eliminate modern slavery risks from its operations while ensuring fair and ethical treatment of all workers contributing to our educational objectives.

5. Supplier engagement

CACGEL followed the ACAN Program for assessing and addressing the risk of modern slavery through the following supplier engagement plan:

Suppliers in high-risk categories were invited to complete the ACAN Supplier Survey. ACAN Program Managers assessed survey results to identify:

- Suppliers with SEDEX membership
- Suppliers willing to join SEDEX
- Suppliers not required by CSPD to join SEDEX

Suppliers were assisted to join SEDEX and provided support to complete the SEDEX Self Assessment Questionnaires (SAQ).

ACAN Program Managers assessed Supplier SAQ results, identified gaps in the supplier's management system such as further training, capacity building needs and development of risk management strategies.





Addressing remediation

CACGEL maintains a firm commitment to ensuring the provision of appropriate and timely remediation for individuals affected by modern slavery, in alignment with the United Nations Guiding Principles on Business and Human Rights, the Commonwealth Modern Slavery Act 2018 – Guidance for Reporting Entities, and all relevant Australian legislative requirements. This commitment encompasses providing for, or actively cooperating in, measures designed to address harms experienced by affected individuals and to tackle root causes in order to mitigate future risks, particularly if CACGEL is determined to have caused or contributed to modern slavery circumstances.

Recognising the inherent complexity of remediation processes, the requirement for specialised expertise and resources, and the imperative to achieve the most comprehensive and rights compatible outcomes for people impacted by modern slavery, CACGEL is a founding member of Domus 8.7. Domus 8.7 was established as an agency of the Catholic Archdiocese of Sydney in 2020 as a key element of the ACAN Modern Slavery Risk Management Program. This collaborative approach to remediation is aligned with the Modern Slavery Act and Catholic Social Teaching which are centered on the needs, wellbeing and empowerment of people impacted. Domus 8.7 provides:

- resources that enable us to listen to workers (grievance channel)
- a 24/7 careline for workers on our sites, staffed by professional counselors
- direct support to people impacted by modern slavery
- guidance and technical assistance to prevent, identify and remediate modern slavery
- a documented process to assess if an organisation has caused, contributed or is directly linked to modern slavery and modern slavery indicators

Domus 8.7 empowers people impacted by modern slavery to have choice and control over what forms of remediation are meaningful to them and to engage safely with business/supply chain actors. Supports may include:

- modern slavery indicator assessment
- needs assessment, case coordination, response and remediation planning
- referrals to community, social services, unions
- transport, accommodation, financial and food support
- legal support, referrals, accompaniment and advocacy
- job training, retraining and redeployment
- accompaniment and advocacy to engage with government and law enforcement agencies
- opportunities to contribute lived expertise to improve modern slavery responses

The Domus 8.7 Advisory Committee Members also include a person with lived expertise, Mr Moe Turaga. Domus 8.7 is a registered charity with the Australian Charities and Not-for profits Commission (ACNC) and is an endorsed Public Benevolent Institution with Deductible Gift Recipient (DGR) status. ABN 244 72497189

Criteria 5: Continuous improvement

Collaboration is at the heart of accelerating progress. This also includes opportunities to comparatively measure social, environmental and governance (business ethics) risks and actions with peers in our network. In its foundational stages, CACGEL used an internally devised ACAN framework to measure progress. This bespoke approach reflected the unique priorities, constraints, and practices across Catholic organisations.

In 2025, the ACAN Program adopted a globally recognised risk measurement system through SEDEX. This aligns reporting entities with a methodology that combines global data about risks in different countries and industries with site-specific information from the SEDEX platform. SEDEX regularly updates the methodology to ensure it is aligned with new and emerging risks. Therefore, completion of the SEDEX SAQ completed by CACGEL is a substantial measure of continuous improvement year on year. Below is an explanation of how scoring is calculated using the SEDEX SAQ and CACGEL 2025 risk scores and management controls that will serve as our benchmark for continuous improvement.

Explanation of scoring

Combined Risk Score 2.9/10 (low risk): calculated from inherent risk and site characteristics, adjusted for management controls and audit results. The score is broken down by pillar and highlights strengths and opportunities to focus our efforts on key areas that drive ethical and sustainable practices.

Inherent Risk Score 3/10 (low risk): predicts potential risks based on a country/region, and sector. Spanning all four pillars, this score is broken down by topics. It can be used as a baseline to identify and prioritise areas for improvement in operations. This score shows the natural risks of doing business in a specific country or sector. It does not include any details about individual sites.



Labour standards pillar

Assesses location and industry factors that could increase labour risks, such as vulnerable worker populations or high rates of workplace violations.



Health and safety pillar

Considers regional and industry-specific health and safety risks, including local regulations and industry accident rates.



Business ethics pillar

Assesses industry and location risks related to unethical practices, such as high corruption levels or weak regulatory oversight.

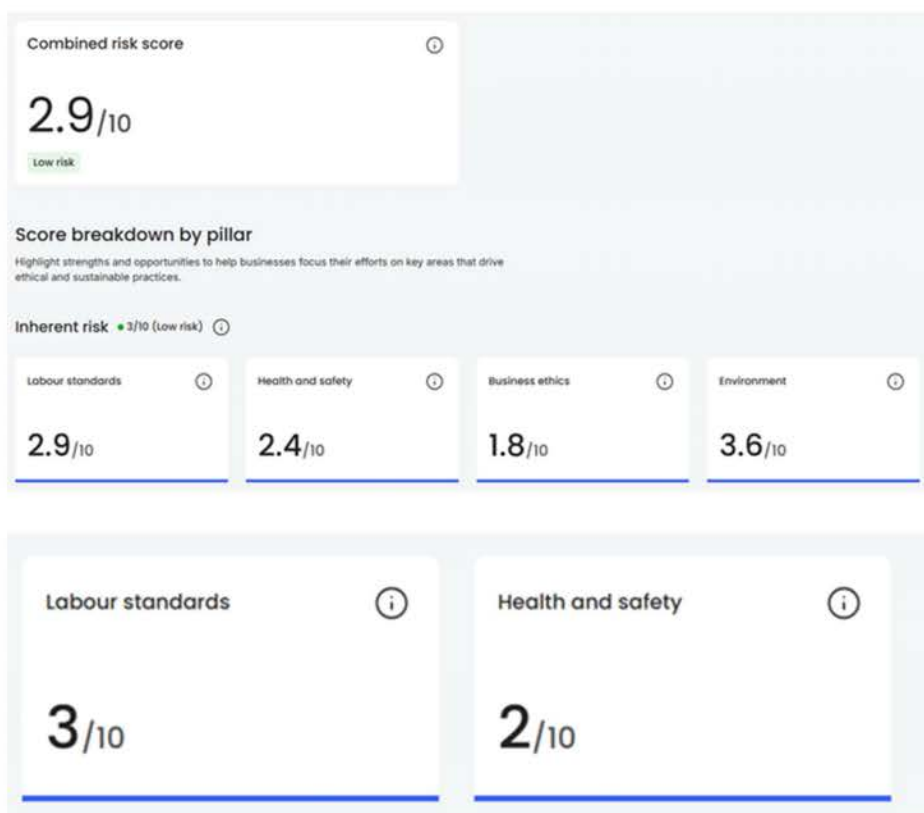


Environment pillar

Examines the environmental impact of the site's industry and location, such as pollution levels or resource use that may create regulatory or compliance risks.

Site characteristics risk score

2.7/10 (low risk)



This score highlights potential risks based on your suppliers' SAQ responses in the Labour Standards and Health and Safety pillars. It can be used to assess and support the implementation of policies and processes that mitigate workplace risks within your supply chain.

For the Environment SAQ, site characteristics consider the type of work, business and location (e.g. proximity to sensitive areas). For the Core SAQs, risks are assessed based on the nature of the work, such as exposure to heavy machinery or hazardous materials.

Labour standards reflect labour-related risks like employment practices, workers rights and wages based on SAQ responses. High-risk activities in this area can raise the score.

Health and safety is based on SAQ responses to questions about site-specific health and safety factors, such as equipment usage, handling of chemicals or accident risks.

Management controls score

4.1/5 (advanced)



Management controls 4.1/5 (Advanced) [View SAQ](#)

Measures suppliers' risk management (0-5, with 5 as best) to assess effectiveness and target improvements.

Section title	Points available	Points achieved	% of points achieved	Score
Labour standards	4.1/5	Advanced		
Health and safety	3.8/5	Good		
Business ethics	4.5/5	Advanced		
Environment	-/5			
Profile	1	1	100%	5.0 (Advanced)
Management systems	31	30	96.8%	4.9 (Advanced)
Freely chosen employment	4	3	75%	3.8 (Good)
Freedom of association	7	7	100%	5.0 (Advanced)
Health and safety	46	35	76.1%	3.8 (Good)
Working hours	6	6	100%	5.0 (Advanced)
Discrimination	41	30	73.2%	3.7 (Good)
Discipline and grievance	28	27	96.4%	4.8 (Advanced)
Communities and human rights	43	27	62.8%	3.2 (Good)
Business ethics	10	9	90%	4.5 (Advanced)

This score measures how well policies or processes are in place to reduce the risks from the site characteristics. It is also based on answers in the SAQ. A Poor score of 0-0.9 indicates that there are few or no controls in place. An Advanced score of 4-5 indicates that there are exemplary controls that exceed compliance and drive innovation.

Labour standards evaluate policies and processes to ensure fair labour standards and worker protections are effectively managed.

Health and Safety reviews the adequacy of safety protocols, emergency preparedness and training efforts to manage health and safety risks on site.

Business Ethics evaluates controls against unethical practices such as anti-bribery policies, compliance with legal standards and transparent operations.

Environment looks at policies managing environmental impact, resource efficiency and waste reduction practices to align with sustainability standards.

ACAN baseline data

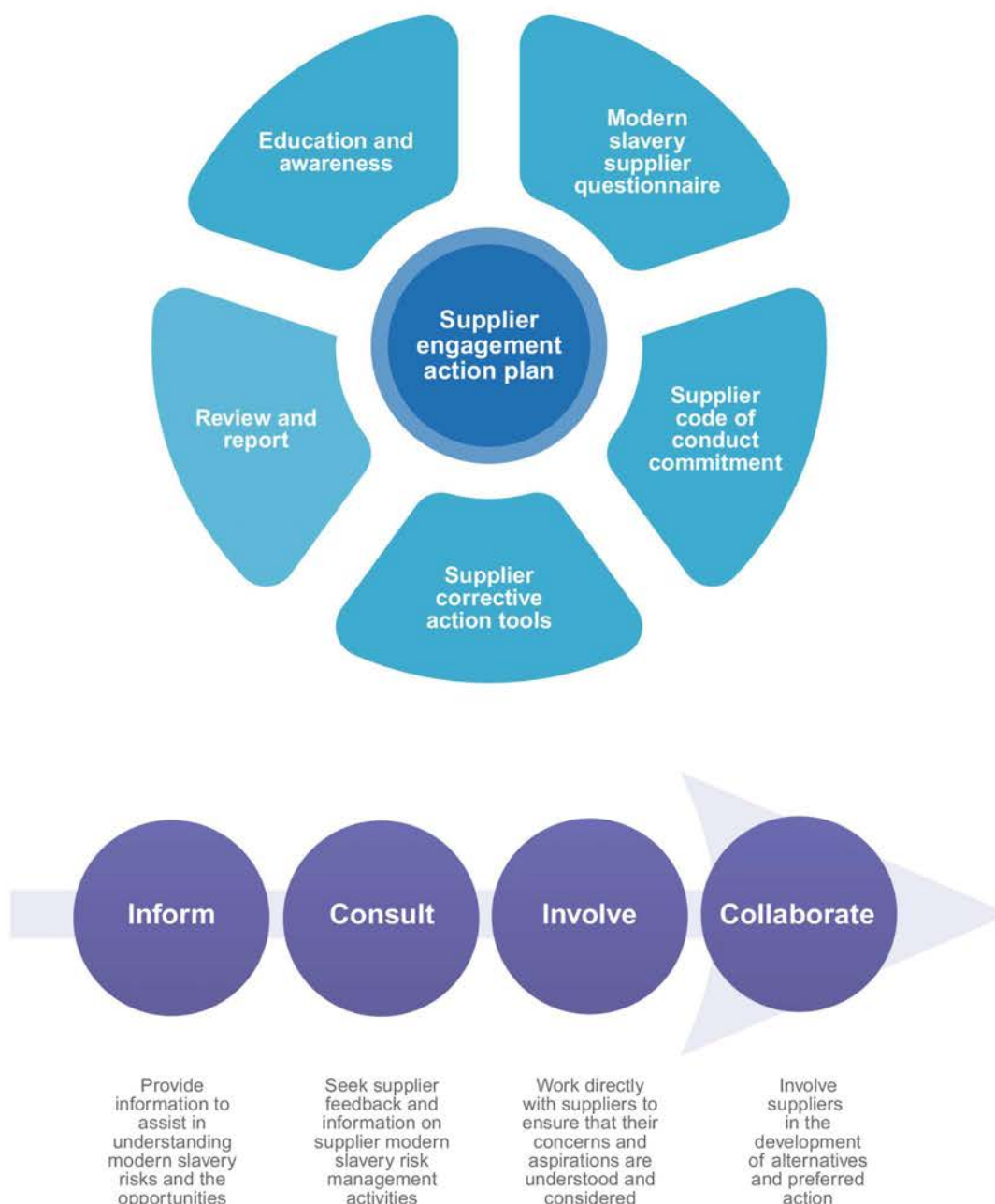
The ACAN baseline data table provides a comparative measure of supplier engagement and program activities to measure progress and inform future action planning.

Activity	2024	2025
Hours spent on modern slavery activities	136	152
Individual staff completed e-learning	0	0
E-learning modules completed	0	0
Total number of suppliers	5506	5949
Number of suppliers with visible contact information and ABN	5126	5949
Number of suppliers across high-risk categories	991	676
Number of ACAN Supplier Surveys completed	604	-
Supplier staff attending capacity building webinars	50	-
Invited to join Sedex	96	2
Joined Sedex	74	98
Sedex SAQ completed	29	55
Social audits	6	7
Corrective actions	21	15
Contacts made via worker voice / grievance mechanism	0	0
Referrals for advice and assistance	1	0
Individuals identified or referred for modern slavery assessment	0	0
Individuals with modern slavery cases remediated	0	0



Modern slavery action plan

CACGEL supplier engagement plan is the cornerstone of risk mitigation to eliminate Modern Slavery from our supply chains. In 2025 we will continue to execute the plan to all high-risk suppliers.



Education and awareness

Throughout 2026 CACGEL will continue to undertake further actions to increase awareness with suppliers and guide them through educational material to assist them in identifying and mitigating Modern Slavery risk in their supply chains.

Our review process

CACGEL regularly reviews of our Modern Slavery action plan at regular appropriate intervals to ensure the ongoing actions remain relevant and effective. Our review process consists of five stages which include:



Annual review of Modern Slavery Framework

The annual review is undertaken to assess the effectiveness of the existing framework and identify areas of improvement. CACGEL continues building and strengthening its current controls, such as the ACAN assessment tool to drive areas requiring further attention and action.

Regular check of the risk review process

This stage is utilised to undertake a further assessment of existing risk identification methodology against CACGEL suppliers. Specifically, CACGEL endeavours to ensure that supplier data is captured and gain further insight into the supply chain map.

Supplier and engagement feedback process

Ongoing engagement with suppliers to identify areas of improvement and education has been identified as a key step to eliminating risk. A dedicated member provides a communication channel for information and feedback will assist in the ongoing improvement of the Modern Slavery framework.

Annual supplier reports / attestation

Supplier reports will assist in understanding our suppliers risk framework and risk exposure. Utilising this tool will assist in CACGEL directing resources where needed most. For example, further communication or education advice in relation to Modern Slavery.

Corrective actions process

In line with stages one through four, the corrective action process will be the activities to further enhance the Modern Slavery Framework.

Criteria 6

CACGEL does not own or control any other entities.

Criteria 7

No further pertinent information beyond that provided in the Statement is required.





CATHOLIC EDUCATION
Archdiocese of Canberra & Goulburn



CATHOLIC
ARCHDIOCESE
OF SYDNEY

MODERN SLAVERY STATEMENT 2025

1 January 2025 - 31 December 2025





CATHOLIC
ARCHDIOCESE
OF SYDNEY

Disclosure

This statement has been produced on behalf of the Catholic Archdiocese of Sydney and key entities of the Archdiocese.

The Catholic Archdiocese of Sydney acknowledges and pays respect to Aboriginal and Torres Strait Islander Peoples as the First Nations Peoples of Australia, on whose ancestral homelands we live, serve, learn, worship and work; the homelands of Eora, Guringai, Dharawal, and Dharug peoples. We pay our respects to Elders past, present and emerging.

We celebrate the histories, languages, cultures and spiritualities of Aboriginal and Torres Strait Islander Peoples. We respect their continuing connections to Country and Sea over thousands of generations, as the world's oldest living cultures. We seek to learn and embrace their care and love of Country.

Catholic Archdiocese of Sydney ABN 72 823 907 843
38 Renwick Street, Leichhardt, NSW 2040
www.sydneycatholic.org

Michael Digges

Executive Director Administration & Finance
for the Catholic Archdiocese of Sydney



Most Rev Archbishop Anthony Fisher OP

I am pleased to provide the sixth annual Modern Slavery Statement for the Catholic Archdiocese of Sydney (CAS) for the 2025 reporting period. This year Sydney Catholic Schools will submit an individual statement. I commend both organisations for their work to assess, address and continuously improve our response to people at risk of modern slavery in our operations and supply chains.

CAS has made progress in key areas of risk management at a time when supplier and business relationships are expanding. In 2025, CAS began preparing for the 54th International Eucharistic Congress. The Congress will welcome Pope Leo XIV to Sydney and hundreds of thousands of pilgrims to attend events in 2028. Embedding social sustainability at the heart of our Congress planning recognises that the joy of the pilgrimage and the dignity of the workers who make it possible are interconnected.

This commitment reached a milestone in 2025 as Domus 8.7 launched a 24/7 Careline to provide a worker-centred response to modern slavery. The Careline strengthens the safety net for the very people whose labour keeps Catholic organisations moving – aged-care workers, cleaners and security guards, construction and other labour hire workers on Catholic sites. In a landscape where many vulnerable workers struggle to be heard, the Careline is a practical, compassionate mechanism for remediation.

Our modern slavery response was also represented internationally by our Lived Experience Lead, Moe Turaga, at a Vatican conference in Rome, in Geneva at the largest global gathering on business and human rights and at events in the Pacific focused on labour mobility. Mr Turaga's lived experience continues to bring insight and moral clarity that deepens and strengthens our efforts.

Finally, I hosted Australia's inaugural Anti-slavery Commissioner, The Hon Chris Evans, at the Sydney Catholic Business Network alongside Mr Turaga. This event educated over 350 of our suppliers, business partners and team members about our anti-slavery response, expectations from government and reaffirmed the importance of our leadership in demonstrating ethical business practices.

We continue to seek divine guidance and strength in this mission, praying for the intercession of St Josephine Bakhita.

Yours sincerely in Christ,



Most Rev. Anthony Fisher OP

This Modern Slavery Statement was approved by the principal governing body of the Catholic Archdiocese of Sydney as defined by the Act on 26 June, 2026. This Modern Slavery Statement is signed by a responsible member of the Catholic Archdiocese of Sydney as defined by the Act.



CatholicCare Sydney

CatholicCare Sydney has a vision for a society in which everyone feels supported and valued, irrespective of beliefs and abilities. CatholicCare Sydney is guided by five values: collaboration, compassion, courage, inclusion, and empowerment. Modern slavery is entirely inconsistent with these values as it traps people in a relationship based on exploitation, where the value of a human person is diminished in the pursuit of wealth.

CatholicCare Sydney joined the Australian Catholic Anti-Slavery Network (ACAN) in 2023. During 2025 we participated in a number of activities that have advanced the anti-slavery cause within the organisation, including attending webinars, training staff, joining Sedex and assessing our network of suppliers. We have included modern slavery clauses in our supplier onboarding material and have worked towards consolidating our supplier list to assist with minimising risk.

We continue to work with ACAN to solicit supplier participation in Self Assessment Questionnaires, and in the development of preferred supplier lists.

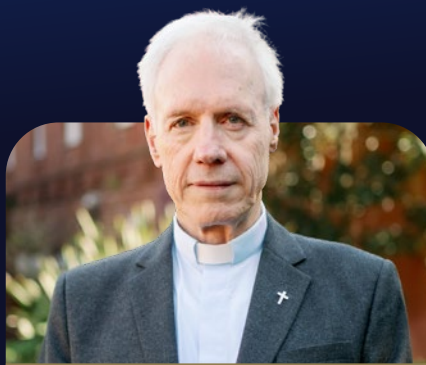
We recognise the insidious nature of exploitation, and the desire for profit over people and so remain alert to our own supply chain practices and how they are operating.

Our Modern Slavery Working Group and Modern Slavery Liaison Officer drive accountability within our organisation and we continue to participate in ACAN.

CatholicCare Sydney is committed to compliance with the Modern Slavery Act 2018 and to supporting a world where modern slavery is eliminated from the practices of businesses and organisations.



Richard Timbs
CEO
CatholicCare Sydney Board



Rev. Dr. Gerald Gleeson
Chair
CatholicCare Sydney Board



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Criteria 1 & 2

About the Catholic Archdiocese of Sydney

The Catholic Archdiocese of Sydney (CAS), under the leadership of Archbishop Anthony Fisher OP, serves the People of God in several metropolitan areas of Sydney including the eastern, southern, inner-western and south-western suburbs and the lower North Shore.

The Archdiocesan Head Office (Chancery) is located at 38 Renwick Street, Leichhardt, NSW 2040. www.sydneycatholic.org

Archdiocesan Entities covered by this Modern Slavery Statement:

Catholic Development Fund (CDF)

ABN: 73866037848

38 Renwick Street, Leichhardt, NSW 2040.

www.sydneycdf.org.au

CatholicCare Sydney Limited

ACN: 614 283 484 as Trustee for the CatholicCare Sydney Trust

ABN: 38 841 427 747, 2C West St, Lewisham, NSW 2049.

www.catholiccare.org

St Mary's Cathedral, Sydney

ABN: 13120232163

St Mary's Cathedral, 2 St Mary's Rd, Sydney, NSW 2000

www.stmaryscathedral.org.au

Domus 8.7

ABN 24 472 497 189

www.domus87.org.au

Australian Catholic Anti-slavery Network (ACAN)

ABN 15 913 623 678

www.acan.org.au



Parishes Serving

590,000

Catholics

spiritually supported by

400

Priests

CAS agencies employing

1,337

staff

Archdiocesan entities

Annual Revenue

CCS

\$64.62m

CDF

\$42.85m

CAS

\$79.60m

Number of Suppliers

CAS 759

CCS 501

Mission

Catholic Archdiocese of Sydney

The mission of the Archdiocese is that given by Jesus Christ to His Apostles: to preach the Good News of Salvation with love; to invite all people into unity with God through His Holy Church; and, to serve them with love and mercy by attending to their spiritual and corporal needs.

CAS Strategic Plan

The Archdiocesan 2025 Strategic Plan Light the Way commits to Strategic Action 4.6 as a priority for Outreach and Charitable Works.

4.6 Work to eradicate modern slavery through active management of our supply chains and by providing advice, remediation and prevention services through our registered charity Domus 8.7

Measure: Number of Sydney based Catholic entities reporting on modern slavery efforts and outcomes.

About CatholicCare Sydney

CatholicCare Sydney is the social service agency of the Archdiocese of Sydney, and began as the Catholic Welfare Bureau in 1941. In 1958 the name changed to the Catholic Family Welfare Bureau, in 1973 it became Centacare Sydney, and in 2008 it became CatholicCare Sydney. Today CatholicCare Sydney employs more than 600 team members, and directly helps more than 56,000 people each year.

On behalf of the Catholic Archdiocese of Sydney, we collaborate with others to promote dignity, strengthen families and connect communities. We do this so that everyone can access meaningful opportunities and improve their wellbeing.

CatholicCare Sydney opens the door to all those who need support with relationships, parenting, ageing,

disability, addiction, homelessness, or mental wellbeing concerns.

Our organisation is guided by five values – collaboration, compassion, courage, inclusion, and empowerment. Our values define how we approach each other, our clients, and our work. We aim to embody each value in everything we undertake and encourage others to do the same.

CatholicCare Sydney is a not-for-profit entity registered with the Australian Charities and Not-for-Profits Commission.

In addition to the head office in Lewisham, other offices are located in Bankstown, Cabramatta West, Fairfield, Lakemba, Liverpool, Sydney City and Sutherland.

CatholicCare Sydney's annual revenue in 2025 was \$63,958,097



Collaboration

We work together and respect the views of colleagues, clients, and stakeholders.



Compassion

We take the time to hear and understand the needs of others and ask how best we can support them.



Courage

We advocate, innovate, and speak up for ourselves and others, even when it seems difficult.



Inclusion

We welcome everyone, regardless of faith, background, gender, age, sexuality, identity, and ability.



Empowerment

We acknowledge people's strengths and dignity and ensure they have the tools to be in control of their own story.



Governance Framework

Catholic Archdiocese of Sydney

CAS is an unincorporated association and registered charity, under the supervision of Archbishop Anthony Fisher OP. The Governance structure of CAS includes the Curia, Council of Deans, Archdiocesan Finance Council, College of Consultors and Trustees, Council of Priests, Archdiocesan Property Committee and the Archdiocesan Investment Committee. There are nine Deaneries – Western, Sutherland, Northern, South West, Central, City, Eastern, St George and Concord.

CAS has several divisions or operations known internally as agencies which provide services, care and support to people in:

- Education
- Prayer, worship and liturgy
- Solidarity and justice
- Vocations and seminary
- Youth and young adults ministry

In addition to pastoral care and religious ministry, CAS undertakes a range of commercial activities to support its works including long and short-term leasehold of properties, procuring goods and services, construction works and redevelopment of existing sites.

The largest agency of CAS is SCS with 147 systemic schools overseen by Sydney Catholic Schools Limited as Trustee for the Sydney Catholic Schools Trust. For the reporting period 2025, SCS is submitting a separate Modern Slavery Statement.

The Australian Catholic Anti-slavery Network risk management program (ACAN Program) and the agency, Domus 8.7 modern slavery remediation service, are facilitated by CAS.

CAS employs five modern slavery specialist staff, including a Modern Slavery Lived Experience Consultant, to manage both the ACAN Program and Domus 8.7.

CatholicCare Sydney

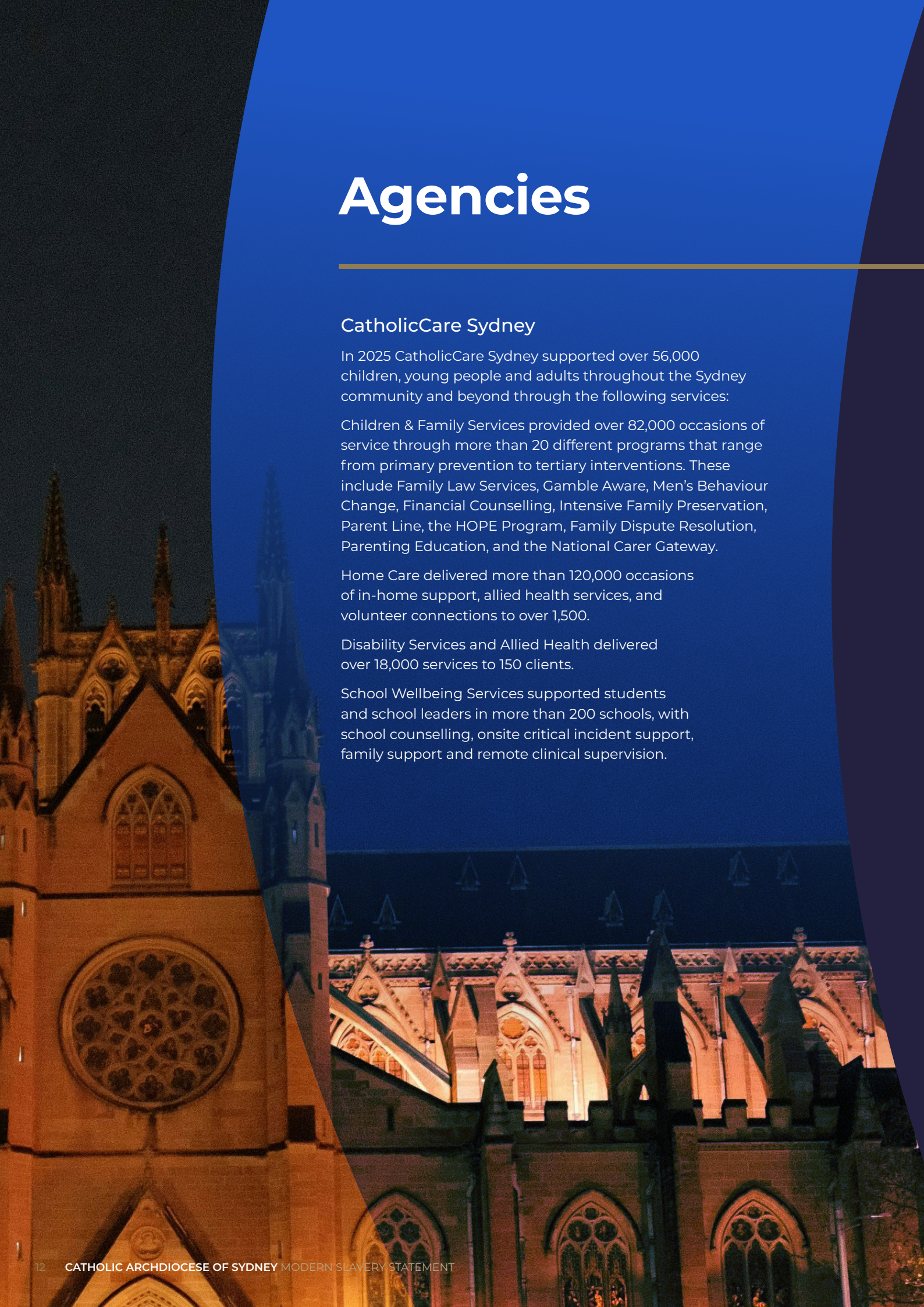
The CatholicCare Sydney Executive Leadership team led by the Chief Executive Officer, reports to a nine-member Board, who in turn report to the Catholic Archdiocese of Sydney led by the Most Rev Anthony Fisher OP, Archbishop of Sydney.

CatholicCare Sydney is a member of the Australian Catholic Anti-slavery Network (ACAN) and employs a Modern Slavery Liaison Officer. The CatholicCare Modern Slavery Working Group (MSWG), as part of the ESG Committee (under the Audit, Risk and Finance Committee), guides the organisation through modern slavery risk management actions.

CatholicCare Sydney operates within the Catholic Archdiocese of Sydney, but also manages a number of state, and national programs, expanding its mission of care.

Organisational Structure

The Catholic Archdiocese of Sydney organisation chart is included in Appendix A.



Agencies

CatholicCare Sydney

In 2025 CatholicCare Sydney supported over 56,000 children, young people and adults throughout the Sydney community and beyond through the following services:

Children & Family Services provided over 82,000 occasions of service through more than 20 different programs that range from primary prevention to tertiary interventions. These include Family Law Services, Gamble Aware, Men's Behaviour Change, Financial Counselling, Intensive Family Preservation, Parent Line, the HOPE Program, Family Dispute Resolution, Parenting Education, and the National Carer Gateway.

Home Care delivered more than 120,000 occasions of in-home support, allied health services, and volunteer connections to over 1,500.

Disability Services and Allied Health delivered over 18,000 services to 150 clients.

School Wellbeing Services supported students and school leaders in more than 200 schools, with school counselling, onsite critical incident support, family support and remote clinical supervision.

Catholic Development Fund

Catholic Development Fund Sydney (CDF) was established by Cardinal Clancy in 1993. CDF is a mechanism through which the Church community of Sydney can make the most of Church financial resources and activities. CDF exists solely for the benefit of the membership of the Archdiocese and other members of the Church community. CDF is governed by a Charter and Rules and is administered through an Advisory Board.

CDF has an annual revenue of \$42.8m and expenditure of approximately \$3.75m including the salaries of its 14 staff. In its operations, CDF engages principally with other Catholic entities and banks.



Peter Bokeyar
General Manager
Catholic Development Fund
Catholic Archdiocese of Sydney

CDF is committed to:

- Maximising the use of Church funds by providing deposit and loans facilities to Parishes, Schools, Religious Orders, Aged/Healthcare Entities and agencies of the Archdiocese
- Managing the funds invested in CDF prudently, ethically and profitably for the good of the wider Church
- Endeavouring to provide a stable and equitable interest rate environment
- Providing professional, helpful and personal service to clients
- Providing efficient and cost-effective transactional services to clients
- Providing a surplus so that the charitable and pastoral works of the Archdiocese may continue
- Continuing to support the Mission of the Church in all aspects of activities

CDF operates on a not-for-profit basis whereby annual surpluses are distributed to:

- Parishes through a rebate on their Charitable Works Fund contributions
- The Sydney Archdiocese for its Charitable and Pastoral Works
- The Reserves of the CDF to ensure its ongoing financial stability

CDF has an Audit and Risk Committee and maintains a comprehensive set of policies including prudential standards, governance, General Manager's authorities, Investments, Deposits and Risk Management.

Criteria 3

Modern slavery risks in operations and supply chains

Risk Assessment

For Catholic entities, modern slavery risks are defined by the ACAN Category Risk Taxonomy, a classification standard that identifies severity of actual or potential harm to people (saliency) in spend categories.

The ACAN Category Risk Taxonomy is based on sources such as:

- the Global Slavery Index
- the International Labor Organisation (ILO), including definitions of modern slavery
- the Bureau of International Labor Affairs (ILAB), US Department of Labor
- the Global Child Forum and UNICEF

Five key factors are also used to determine the level of risk:

Geography

The country or location where a good is made or service is delivered.

Industry

The sector in which the making of goods or delivery of service occurred.

Commodity

The raw materials or components that comprise the goods or products.

Workforce vulnerability

Factors such as bonded visas, temporary migrants, women or children known to be employed in specific industry sectors.

Domus 8.7

Trends, cases, and risk intelligence identified through the Domus 8.7 remediation service, including grievances and remediation insights relevant to category and risk to workers.

Classification

High Risk

- Building and construction
- Cleaning and Security
- Events and event management
- Facility management and property maintenance
- Finance and Investment
- Food and catering services
- Furniture and office supplies
- ICT Hardware
- ICT Software and network services - offshore
- Labour Hire
- Linen, laundry and textile products
- Medical devices and supplies
- Transport, logistic and warehousing
- Uniforms and PPE
- Waste management services

Medium Risk

- Advertising & Marketing
- ICT Software and network services - onshore
- Utilities
- Fleet management, consumables and maintenance
- Travel and accommodation
- Print / Mail Provider

Low Risk

- Professional services
- Financial expenses
- Government and agency fees
- Licence / membership fees

Note: The following categories are Not in Scope of the ACAN Category Risk Taxonomy

- Pastoral work
- Payroll (excluding labour-hire and sub-contracting)

Through the ACAN Program, CAS agencies continue to focus activities on suppliers of labour and the operational risk associated with the following labour supply chains:

- Cleaning and security services
- Facility management and property maintenance
- Labour Hire
- Waste management services

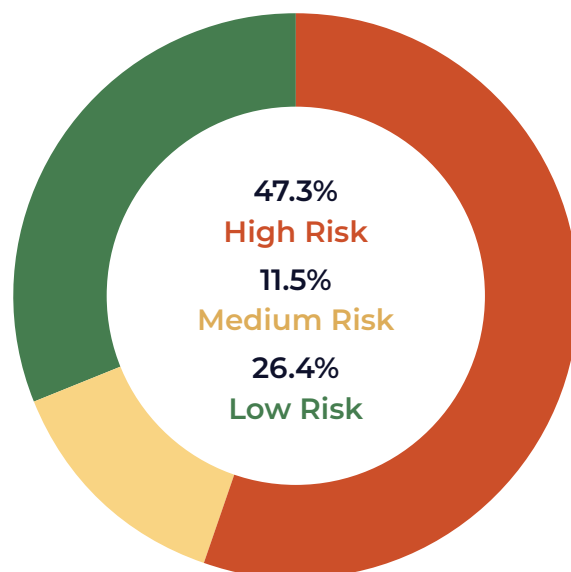
CAS Supply Chain Risk

Analysis of CAS supply chains is based on ACAN risk taxonomy across 23 categories of geographic location, industry or sector, commodity, product category and workforce profile.

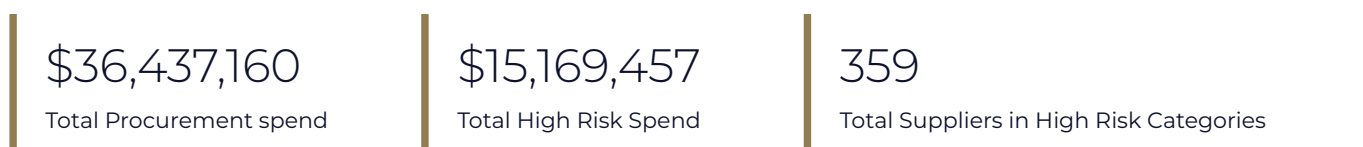
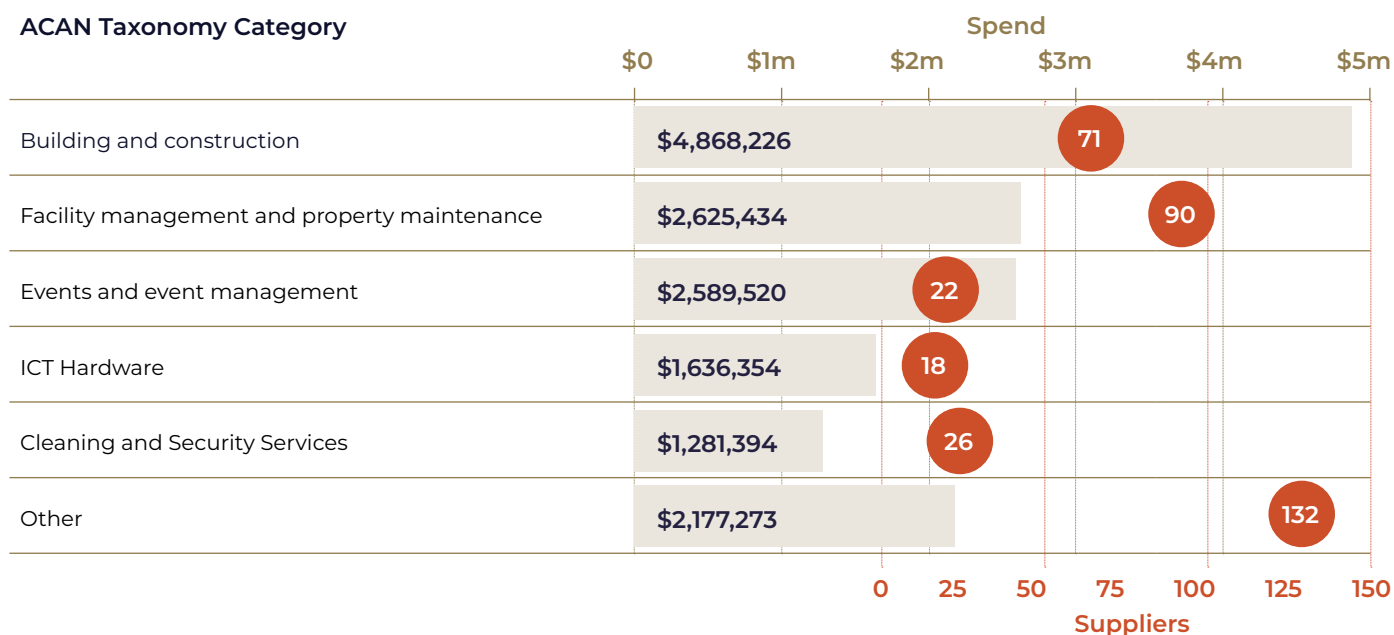
CAS Supplier Analysis

	Total	High	Medium	Low
Spend (\$m)	\$63.4*	\$15.2	\$3.1	\$37.9
Number of suppliers	759*	359	87	200
Percentage of suppliers	100%	47.3%	11.5%	26.4%

Note: *Inclusive of spend classified as Not in Scope for the Modern Slavery Risk Management Program



CAS High Risk Spend

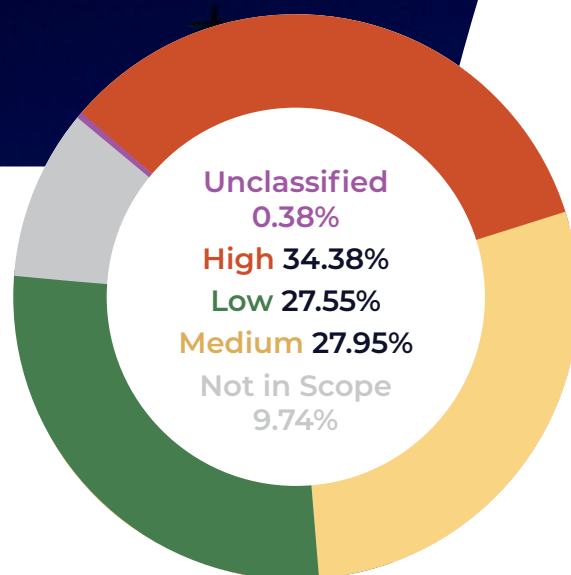


Facility management and property maintenance	90
Building and construction	71
Furniture and office supplies	50
Food and catering services	40
Cleaning and Security Services	26
Events and event management	22
ICT Hardware	18
Waste management services	12
Linen, laundry and textile products	10
Transport, Logistics and Warehousing	7
Finance and Investment	5
Uniforms and PPE	4
Medical devices and supplies	3
Labour Hire	1

Building and construction	\$4,868,226
Facility management and property maintenance	\$2,625,434
Events and event management	\$2,589,520
ICT Hardware	\$1,636,354
Cleaning and Security Services	\$1,281,394
Food and catering services	\$780,488
Furniture and office supplies	\$676,544
Finance and Investment	\$244,060
Linen, laundry and textile products	\$165,885
Labour Hire	\$119,938
Waste management services	\$110,632
Transport, Logistics and Warehousing	\$66,927
Uniforms and PPE	\$8,744
Medical devices and supplies	\$4,055

CatholicCare Supply Chain Risk

	Total	High	Medium	Low
Spend (\$m)	\$18.8	\$6.5	\$5.2	\$5.2
Number of suppliers	501	218	63	169
Percentage of suppliers	90.3%	34.4%	27.9%	27.6%



Unclassified
0.38%

High
34.38%

Low
27.55%

Medium
27.95%

Not in Scope
9.74%



ACAN Taxonomy Category - Entity	Count of Business name
Labour Hire	60
Facility management and property maintenance	57
Medical devices and supplies	29
Food and catering services	20
Cleaning and Security Services	18
Events and event management	11
Furniture and office supplies	10
Finance and Investment	4
ICT Hardware	2
Transport, Logistics and Warehousing	2
Uniforms and PPE	2
Waste management services	2
Linen, laundry and textile products	1

ACAN Taxonomy Category - Entity	Sum of Entity Total Spend - 2025
Finance and Investment	\$2,256,355
Labour Hire	\$1,799,883
Medical devices and supplies	\$912,380
Facility management and property maintenance	\$782,925
Cleaning and Security Services	\$195,221
Furniture and office supplies	\$187,750
Food and catering services	\$159,374
Events and event management	\$63,506
Waste management services	\$34,700
Uniforms and PPE	\$27,151
ICT Hardware	\$25,896
Linen, laundry and textile products	\$3,579
Transport, Logistics and Warehousing	\$2,770

Criteria 4

Actions taken to assess and address risk

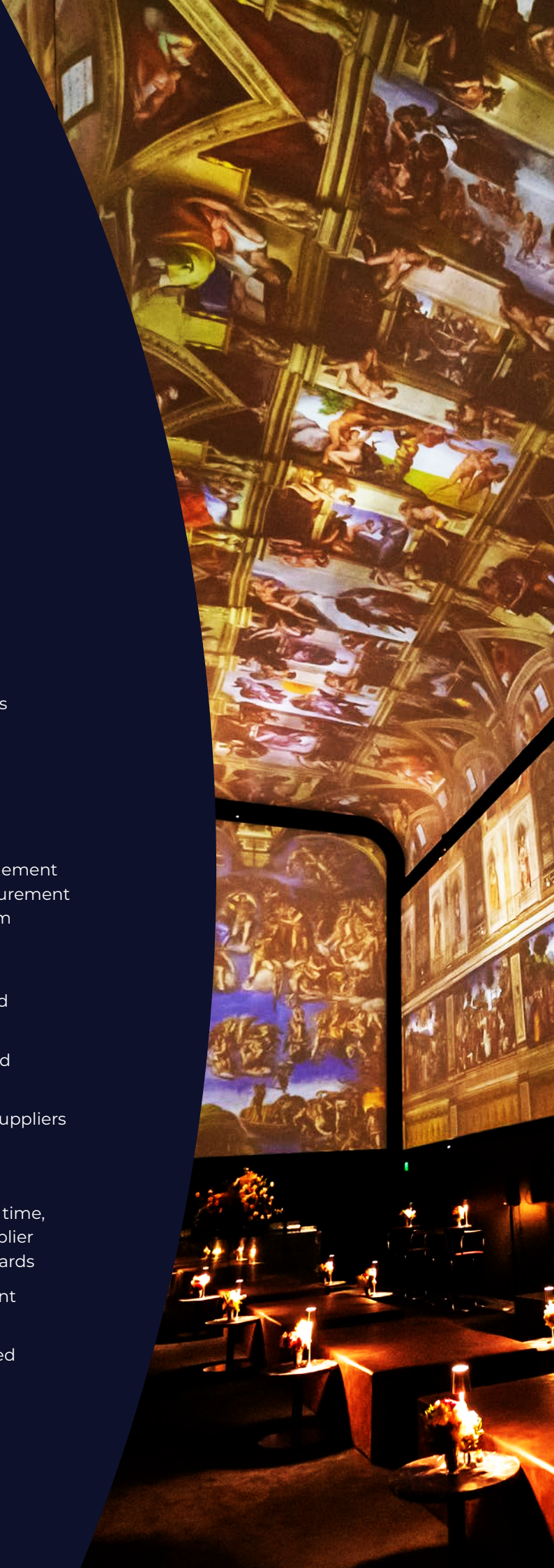
CAS implemented the ACAN Program as follows:

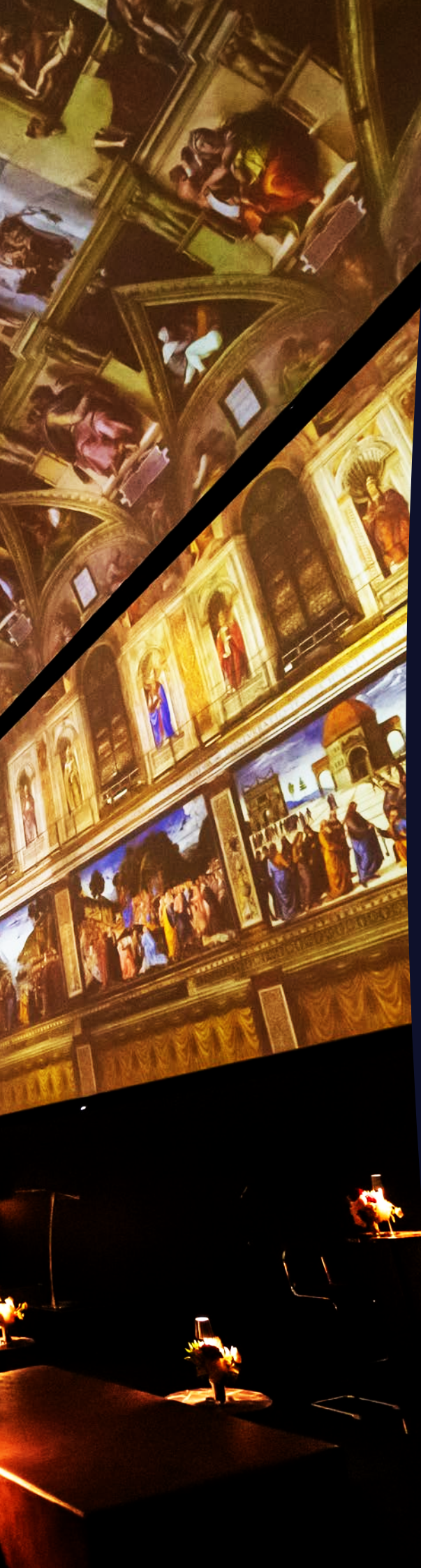
ACAN Supplier Engagement

The ACAN Program provides supplier engagement support and data, enabling a systematic and comprehensive supply chain risk assessment.

In 2025 the ACAN Program launched a new purpose-built data management platform - ROTA. ROTA centralises the ACAN Program framework and facilitates supplier performance evaluation and engagement.

1. Evaluation of the modern slavery risk within operations and supply chains, using the ACAN Risk Taxonomy
2. ACAN Supplier Survey to identify supplier revenue, number of employees, countries of origin for goods sourced overseas, workforce contractual arrangements and Sedex membership status.
3. Supplier education on modern slavery and risk management in key areas: cleaning, building and construction, procurement of labour, labour hire and services, sourcing goods from overseas, grievance mechanisms and remediation
4. Onboarding suppliers to Sedex requires a business address, contact details and goods or services provided
5. Sedex Self-Assessment Questionnaire (SAQ) helps suppliers to evaluate their practices against established standards and identify areas for improvement
6. Desktop review to identify key actions required from suppliers
7. Enhance supplier screening using Know Your Client (KYC) intelligence software
8. Corporate Social Compliance Audits provide a point in time, objective and independent verification process of supplier alignment with local laws and worker wellbeing standards
9. Domus 8.7 Index modern slavery statement assessment on selected suppliers in high-risk categories
10. ACAN Prequalified Supplier Directory - a list of preferred suppliers accessible to Catholic organisations





Case Study:

Due Diligence - CAS agency review of over 20 labour hire service providers

Background

Following the Fair Work Commission's increase to Modern Award rates and the legislated increase to the Superannuation Guarantee in July 2024, Procurement requested written confirmation from labour hire service providers to verify that employees were being paid correctly.

Subsequently, a desktop review was conducted on a sample of these suppliers. This review was prompted by the observation that despite an increase in the cost of labour, very few labour hire service providers requested a corresponding price adjustment.

The review, which analysed contracts and tender documentation, identified concerns regarding subcontracting and an assessment that contracted rates were insufficient to cover employee entitlements, overheads, and profit margins.

Key desktop review findings in 2025:

- Widespread underpayments, non payment of penalty rates, superannuation
- Poor record keeping
- Discrepancies with Payroll Tax and Workers' Compensation premiums
- Subcontracting risks blocking visibility of employment conditions and making it difficult to verify compliance.

Actions: strengthen our procurement framework to include mandatory compliance schedules, specific requirement for subcontractor approval, audit rights, and mechanisms to link price adjustments to award rate changes.

Deployment of Domus 8.7 Careline resources to connect vulnerable workers to support. Multi-lingual Domus 8.7 posters will be rolled out on site in 2026.

The CAS agency leadership approved the continued implementation of a new, strengthened procurement framework for labour hire service providers.

Remediation

The Catholic Archdiocese of Sydney established Domus 8.7 as an agency in 2020 as a key element of the ACAN Program as the Catholic remediation scheme for individuals impacted by modern slavery.

This collaborative approach to remediation is aligned with the Modern Slavery Act and Catholic Social Teaching which are centered on the needs, wellbeing and empowerment of people impacted.

Domus 8.7 provides:

- resources that enable us to listen to workers (grievance channel)
- a 24/7 careline for workers on our sites, staffed by professional counsellors
- direct support to people impacted by modern slavery
- guidance and technical assistance to prevent, identify and remediate modern slavery
- a documented process to assess if an organisation has caused, contributed or is directly linked to modern slavery and modern slavery indicators

Domus 8.7 empowers people impacted by modern slavery to have choice and control over what forms of remediation are meaningful to them and to engage safely with business/supply chain actors. Supports may include:

- modern slavery indicator assessment
- needs assessment, case coordination, response and remediation planning
- referrals to community, social services, unions
- transport, accommodation, financial and food support
- legal support, referrals, accompaniment and advocacy
- job training, retraining and redeployment
- accompaniment and advocacy to engage with government and law enforcement agencies
- opportunities to contribute lived expertise to improve modern slavery responses

The Domus 8.7 Advisory Committee Members also include a person with lived expertise, Mr Moe Turaga. Domus 8.7 is a registered charity with the Australian Charities and Not-for profits Commission (ACNC) and is an endorsed Public Benevolent Institution with Deductible Gift Recipient (DGR) status. ABN 244 72497189

DOMUS
8.7





Measuring Effectiveness

Continuous improvement

Collaboration is at the heart of accelerating progress. This also includes opportunities to comparatively measure social, environmental and governance (business ethics) risks and actions with peers in our network.

In its foundational stages, the Archdiocese used an internally devised ACAN framework to measure progress. This bespoke approach reflected the unique priorities, constraints, and practices across Catholic organisations.

In 2025, the ACAN Program adopted a globally recognised risk measurement system through SEDEX. This aligns reporting entities with a methodology that combines global data about risks in different countries and industries with site-specific information from the SEDEX platform. SEDEX regularly updates the methodology to ensure it is aligned with new and emerging risks.

Therefore, completion of the SEDEX SAQ completed by the Archdiocese is a substantial measure of continuous improvement year on year. Below is an explanation of how scoring is calculated using the SEDEX SAQ and Archdiocese of Sydney 2025 risk scores and management controls that will serve as our benchmark for continuous improvement.

Explanation of Scoring

Combined Risk Score 0/10 - calculated from inherent risk and site characteristics, adjusted for management controls and audit results. The score is broken down by pillar and highlights strengths and opportunities to focus our efforts on key areas that drive ethical and sustainable practices.

Inherent Risk Score 0/10 - predicts potential risks based on a country/region, and sector. Spanning all four pillars, this score is broken down by topics. It can be used as a baseline to identify and prioritise areas for improvement in operations. This score shows the natural risks of doing business in a specific country or sector. It does not include any details about individual sites.

Labour Standards Pillar - assesses location and industry factors that could increase labour risks, such as vulnerable worker populations or high rates of workplace violations.

Health and Safety Pillar - considers regional and industry-specific health and safety risks, including local regulations and industry accident rates.

Business Ethics Pillar - assesses industry and location risks related to unethical practices, such as high corruption levels or weak regulatory oversight.

Environment Pillar - examines the environmental impact of the site's industry and location, such as pollution levels or resource use that may create regulatory or compliance risks.

Site Characteristics Risk Score 0/10

Highlights potential risks based on your suppliers' SAQ responses in the Labour Standards and Health and Safety pillars. This score can be used to assess and support the implementation of policies and processes that mitigate workplace risks within your supply chain. For the Environment SAQ, site characteristics consider the type of work, business and location (e.g. proximity to sensitive areas). For the Core SAQs, risks are assessed based on the nature of the work, such as exposure to heavy machinery or hazardous materials.

Labour standards - reflects labour-related risks like employment practices, workers rights and wages based on SAQ responses. High-risk activities in this area can raise the score.

Health and Safety - based on SAQ responses to questions about site-specific health and safety factors, such as equipment usage, handling of chemicals or accident risks.

Combined risk score

5/10

Low risk

Score breakdown by pillar

Highlight strengths and opportunities to help businesses focus their efforts on key areas that drive ethical and sustainable practices.

Inherent risk ● 2.5/10 (Low risk)

Labour standards

2.59/10

Health and safety

1.6/10

Business ethics

1.4/10

Environment

2.8/10

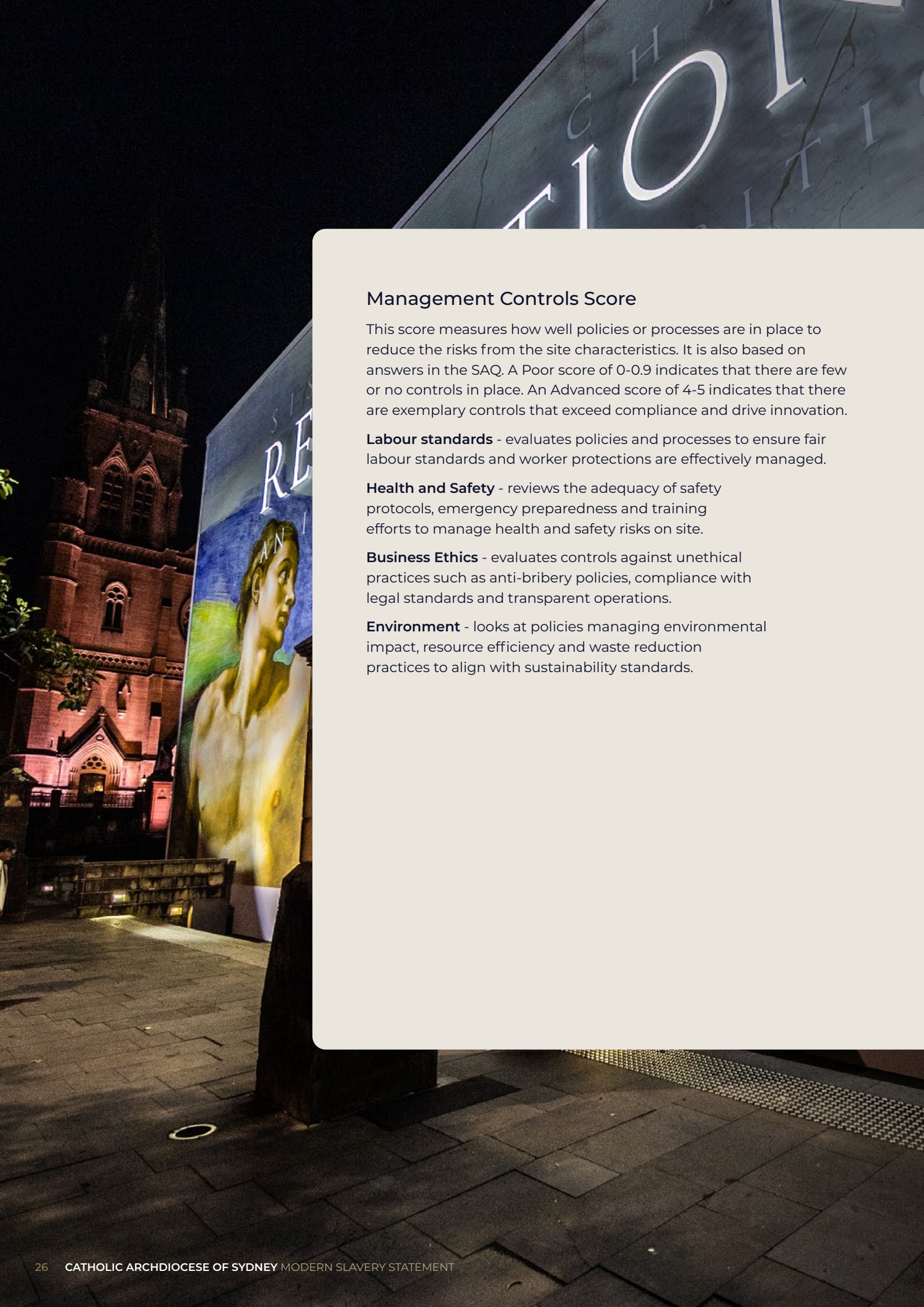
Site characteristic risk ● 8.4/10 (Low risk)

Labour standards

9.2/10

Health and safety

6.4/10



Management Controls Score

This score measures how well policies or processes are in place to reduce the risks from the site characteristics. It is also based on answers in the SAQ. A Poor score of 0-0.9 indicates that there are few or no controls in place. An Advanced score of 4-5 indicates that there are exemplary controls that exceed compliance and drive innovation.

Labour standards - evaluates policies and processes to ensure fair labour standards and worker protections are effectively managed.

Health and Safety - reviews the adequacy of safety protocols, emergency preparedness and training efforts to manage health and safety risks on site.

Business Ethics - evaluates controls against unethical practices such as anti-bribery policies, compliance with legal standards and transparent operations.

Environment - looks at policies managing environmental impact, resource efficiency and waste reduction practices to align with sustainability standards.

Management Controls 3.0/5 (Good)

Measures suppliers' risk management (0–5, with 5 as best) to assess effectiveness and target improvements.

Labour standards

2.3/5

Moderate

Health and safety

4.4/5

Advanced

Business ethics

0/5

Poor

Environment

0/5

Poor

Section title	Points available	Points achieved	% of points achieved	Score
Profile	4	1	25%	1.3 (Fair)
Workplace Impact	2	1	50%	2.5 (Moderate)
Management systems	30	11	36.7%	1.9 (Fair)
Freely chosen employment	34	10	29.4%	1.5 (Fair)
Freedom of association	7	7	100%	5.0 (Advanced)
Health and safety	46	38	82.6%	4.2 (Advanced)
Living accommodation	87	83	95.4%	4.8 (Advanced)
Children and young workers	13	1	7.7%	0.4 (Poor)
Wages	27	11	40.7%	2.1 (Moderate)
Working hours	25	8	32%	1.6 (Fair)
Discrimination	24	6	25%	1.3 (Fair)
Regular employment	25	16	64%	3.2 (Good)
Discipline and grievance	34	27	79.4%	4.0 (Advanced)
Environment	2	0	0%	0.0 (Poor)
Business ethics	10	7	70%	3.5 (Good)

The baseline data tables below contains metrics for CAS and CatholicCare. These key metrics provide a quantitative basis to evaluate actions and results, providing an objective measure of achievements.

	ACTIVITY - Catholic Archdiocese of Sydney	2023	2024	2025
INTERNAL / STAFF	Hours spent on modern slavery activities	0	20	255
	Individual staff completed e-learning	0	0	300
	E-learning modules completed	0	0	300
EXTERNAL / SUPPLIER ENGAGEMENT	Total number of suppliers	1006	1232	759
	Number of suppliers with visible contact information and ABN	3	167	255
	Number of suppliers across high-risk categories	574	80	359
	Number of ACAN Supplier Surveys completed*	88	22	310
	Supplier staff attending capacity building webinars	11	0	16
	Invited to join Sedex*	4	1	26
	Joined Sedex*	4	15	23
	Sedex SAQ completed*	4	40	29
	Social audits	1	0	0
	Corrective actions	0	0	0

	ACTIVITY - CatholicCare Sydney	2023	2024	2025
INTERNAL / STAFF	Hours spent on modern slavery activities	57	42	17
	Individual staff completed e-learning	124	9	106
	E-learning modules completed	208	13	106
EXTERNAL / SUPPLIER ENGAGEMENT	Total number of suppliers	709	712	501
	Number of suppliers with visible contact information and ABN	661	660	493
	Number of suppliers across high-risk categories	1	137	218
	Number of ACAN Supplier Surveys completed*	8	128	144
	Supplier staff attending capacity building webinars	85	32	18
	Invited to join Sedex*	29	25	31
	Joined Sedex*	12	25	16
	Sedex SAQ completed*	0	10	5
	Social audits	1	2	0
	Corrective actions	0	13	0

*Cumulative

Data analysis shows an increase in the number of suppliers completing the ACAN supplier survey. Visibility over self-reported information and modern slavery risks associated with individual suppliers improved with an increase in the number of Sedex SAQs completed.

Future actions

In 2026 and beyond, the Catholic Archdiocese of Sydney will continue to strengthen its modern slavery response in line with Lighting the Way. In line with Commitment 4.6, the Archdiocese will work to eradicate modern slavery through active management of supply chains and the provision of advice, remediation and prevention services through Domus 8.7.

To advance this commitment, the Archdiocese will focus on two priority actions.

1. Eucharistic Congress 2028 procurement

The Archdiocese will work with ACAN to embed modern slavery risk management into procurement activities for the 2028 Eucharistic Congress. This will include setting expectations for suppliers to participate in the ACAN risk management program and engage with the Domus 8.7 remediation service.

2. 75 Elizabeth Street refurbishment

The Archdiocese will include modern slavery risk management and Domus 8.7 requirements in the Request for Tender process for the refurbishment of its new head office at 75 Elizabeth Street, Sydney.

Together, these actions will support the Archdiocese's implementation of Strategic Plan Commitment 4.6 by strengthening supply chain due diligence, embedding remediation pathways into major procurement activities, and documenting the outcomes of modern slavery risk management efforts.

Process of consultation with key Archdiocesan entities

The CatholicCare Modern Slavery Working Group is comprised of members of the ESG Committee as follows:

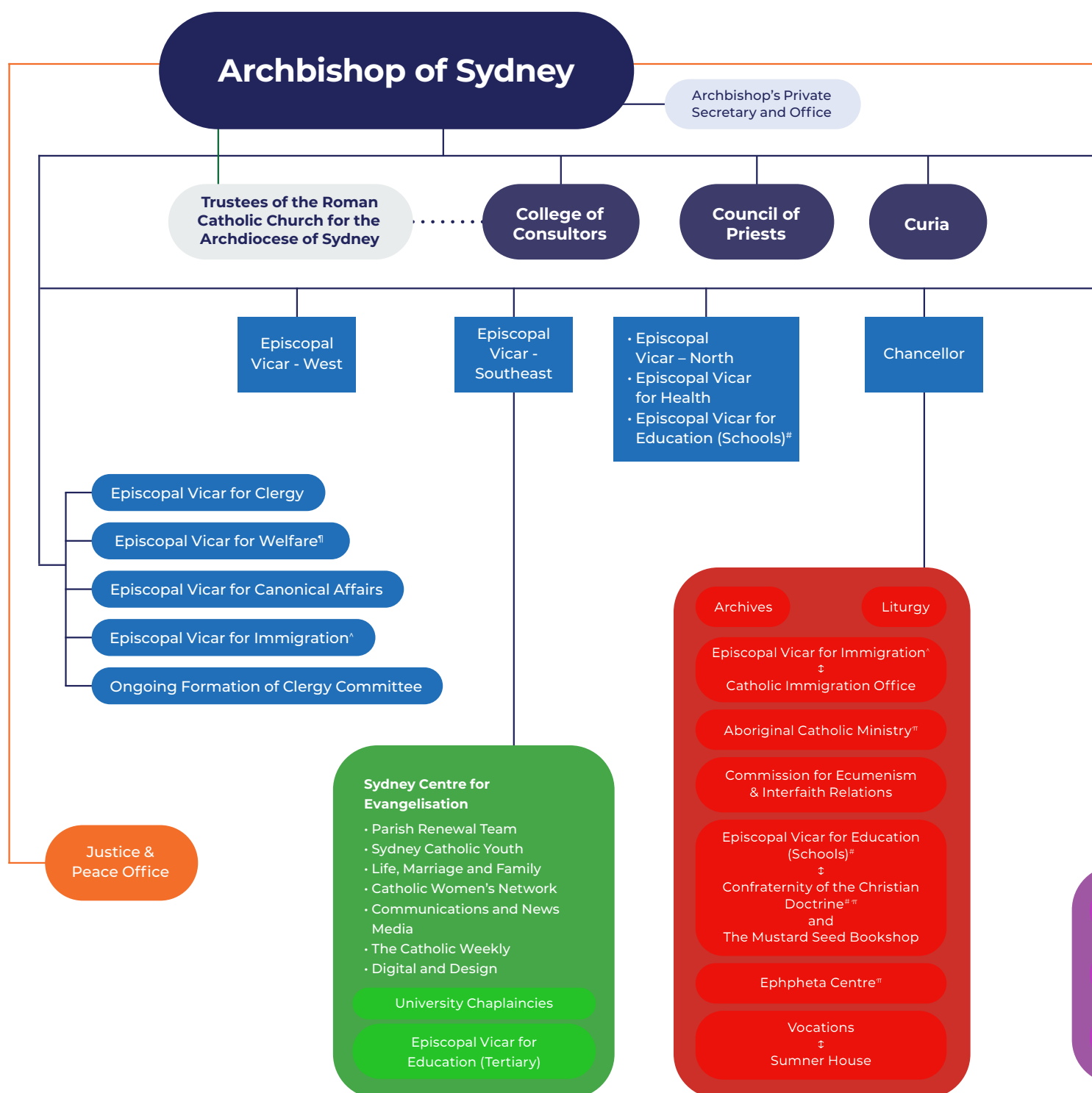
- ESG Chairperson
- Finance
- Risk & Assurance
- People & Culture
- Procurement
- Communications

CAS plans for 2026 and beyond

1. Enhance tender documentation for high risk categories, security and merchandise for the Eucharistic Congress 2028.
2. Strengthen the identification of subcontracting practices, supply chain transparency, Fair Work Act compliance,
3. Workplace Health and Safety (WHS) compliance, and modern slavery risks. This initiative aims to improve due diligence, enhance supplier accountability, and identify high risk suppliers more effectively.
4. Continue improving data integrity and reporting capabilities by updating Finance systems and supplier onboarding processes. This includes ensuring standard supplier classifications align with the ACAN Category Risk Taxonomy
5. Continue raising awareness of modern slavery with CAS staff and suppliers by commemorating the Feast Day of St Bakhita
6. Remain vigilant regarding the mandatory inclusion of Modern Slavery clauses in all new supplier contracts.

Organisational Charts

Catholic Archdiocese of Sydney Organisational Chart

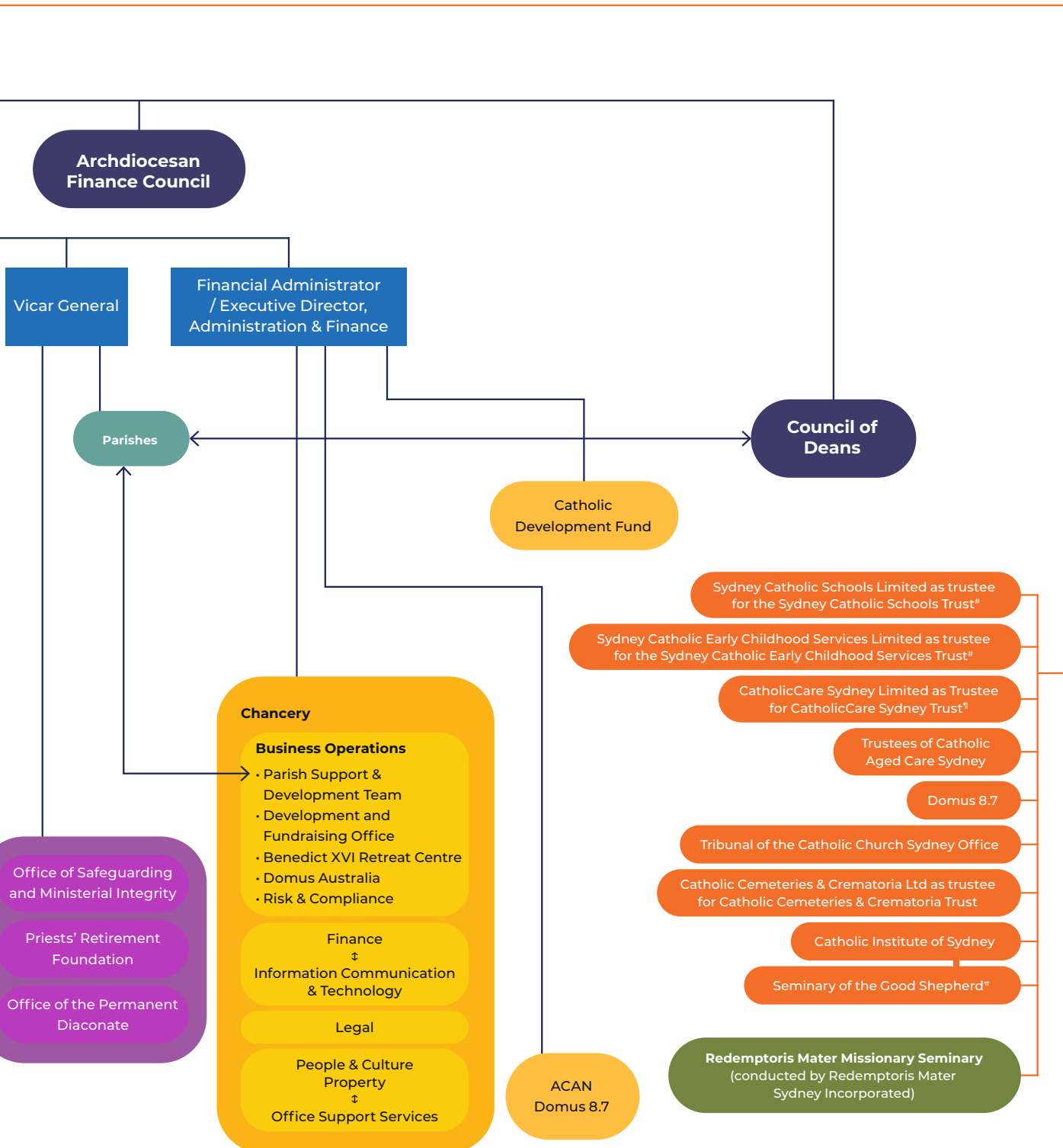


[#] The Episcopal Vicar for Education (Schools) is appointed by the Archbishop to assist him in overseeing Sydney Catholic Schools, Sydney Catholic Early Childhood Services and The Confraternity of the Christian Doctrine.

[†] The Episcopal Vicar for Welfare is appointed by the Archbishop to assist him in overseeing CatholicCare Sydney.

^{††} Charitable Works Fund is a centralised fund that supports the charitable and pastoral activities of 6 agencies, including the Aboriginal Catholic Ministry, Confraternity of the Christian Doctrine, Ephpheta Centre and the Seminary of the Good Shepherd.

696730v6 DRAFT as at 1/10/2024





CatholicCare Sydney Organisational Chart





CATHOLIC
ARCHDIOCESE
OF SYDNEY

CATHOLIC ARCHDIOCESE OF SYDNEY MODERN SLAVERY STATEMENT

Modern Slavery Statement

1 January 2025 - 31 December 2025

Email: antislavery@sydneycatholic.org

Catholic Archdiocese of Sydney

ABN 72 823 907 843

38 Renwick Street, Leichhardt, NSW 2040

www.sydneycatholic.org

Published June 2026



Modern Slavery Statement

1 January 2025 – 31 December 2025



**Catholic
Cemeteries +
Crematoria**



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Disclosure Note

This statement has been made on behalf of Catholic Cemeteries & Crematoria Limited as Trustee of the Catholic Cemeteries & Crematoria Trust trading as Catholic Cemeteries + Crematoria. This Statement covers all entities owned or controlled by Catholic Cemeteries & Crematoria Limited.

Head Office:

Catholic Cemeteries + Crematoria
Level 2, 11 Murray Rose Ave
Sydney Olympic Park NSW 2127

Website: www.catholiccemeteries.com.au
Contact for Modern Slavery: Mina Neary
Email: minan@catholiccemeteries.com.au

Leadership Message, Approval and Signature

At Catholic Cemeteries + Crematoria (CCC), our mission is grounded in the belief that every person is created with inherent dignity and worth, reflecting the image of God. This conviction shapes how we serve families, how we steward sacred places of remembrance, and how we conduct ourselves as an organisation entrusted with care, compassion, and integrity. Our values of faith, respect, collaboration, and ethical responsibility continue to guide our commitment to protecting the vulnerable and promoting human dignity in all aspects of our work.

Modern slavery remains a pervasive global challenge, and organisations like ours have a responsibility to ensure that our operations and supply chains do not contribute to exploitation. CCC has chosen to voluntarily comply with the Modern Slavery Act 2018 (Cth), recognising that ethical leadership and strong governance extend beyond minimum legal thresholds. We are proud to submit our sixth Modern Slavery Statement through the Australian Catholic Antislavery Network (ACAN) Compendium of Modern Slavery Statements.

Over the past year, CCC has continued to strengthen its approach to identifying, assessing, and addressing modern slavery risks. Our work has included more targeted, risk informed engagement with suppliers, the integration of modern slavery considerations into enhanced procurement practices, and ongoing participation in ACAN initiatives that support continuous improvement. These efforts reflect our commitment to responsible governance and our desire to contribute to a broader culture of ethical practice across the Catholic sector.

We remain dedicated to working collaboratively with our Board, staff, suppliers, ACAN, and the communities we serve. Through these partnerships, we aim to build resilience, increase transparency, and uphold the values that define our organisation. Our focus is not only on compliance but on fostering the awareness, accountability, and capability necessary to identify risks early and respond effectively, so that respect for human dignity is embedded in every decision we make.



A handwritten signature in black ink, appearing to read 'Lauren Hardgrove'.

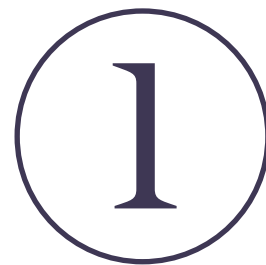
Lauren Hardgrove
Chief Executive Officer



A handwritten signature in black ink, appearing to read 'Danny Casey'.

Danny Casey
Chair

Criteria 1: About Us



This statement relates to the Catholic Cemeteries & Crematoria Trust (ABN 54 281 755 117), operating as Catholic Cemeteries + Crematoria (CCC). The Trust was established under the Catholic Cemeteries and Crematoria Trust Act 2024 (NSW).

CCC is committed to providing dignified funeral services and perpetual care of resting places. We recognise cemeteries as sacred spaces that honour memory, faith, and community. Our role extends beyond the funeral service to the long term stewardship of these places of remembrance.

Although CCC's turnover remains below the \$100 million threshold for mandatory reporting under the Modern Slavery Act 2018 (Cth), the Board has chosen to maintain a proactive anti slavery risk management program. This includes strengthened procurement practices, supplier engagement, and ongoing education to build awareness and capability across the organisation.

This Modern Slavery Statement is approved by the principal governing body, Catholic Cemeteries & Crematoria Limited as Trustee of the Catholic Cemeteries & Crematoria Trust, as defined by the Modern Slavery Act 2018 (Cth), on 19th of June, 2026.

This Modern Slavery Statement is signed by a responsible member of Catholic Cemeteries + Crematoria as defined by the Act.

Vision + Mission

CCC's vision and mission together provide a clear and enduring foundation for our direction as an organisation. They articulate why we exist, what we aspire to achieve, and how we serve our communities. These statements act as a constant reference point for decision making, ensuring that our long term goals remain aligned with our core purpose and the values that guide our work.



Our Vision

Honouring every life forever.



Our Mission

Remembering the dead.
Serving the living.

Our Purpose

Our purpose is the heartbeat of our organisation – it is about why we do what we do, the impact we have on people's lives and why we insist on excellence.



We honour every life through our own Catholic rituals, those of other faiths, and those of none.



We will accompany and comfort those who mourn, as we have done for nearly 160 years.



We are living out the Corporal and Spiritual Works of Mercy from Jesus' teachings in the Gospels.

Our Values

Values have shaped CCC's identity since its inception and continue to underpin every aspect of our operations. They influence how we engage with families, how we steward sacred places, and how we approach governance and organisational responsibility. As CCC looks to the future, these values remain central to who we are and how we act. They form the cultural fabric that supports our mission and strengthens our commitment to ethical, compassionate, and community centred service.



Criteria 2: Structure, Operations and Supply Chain



Our Organisational Structure

Catholic Cemeteries and Crematoria Trust (CCCT) (ABN 54 281 755 117), trading as Catholic Cemeteries + Crematoria (CCC), is a not-for-profit, Catholic faith-based organisation providing cemetery and crematorium services across Greater Sydney. CCCT is a charity registered with the Australian Charities and Not-for-profits Commission (ACNC).

CCCT is governed by a single corporate trustee: Catholic Cemeteries and Crematoria Limited (CCC Ltd) (ABN 44 638 153 689), a not-for-profit public company limited by guarantee, also a charity registered with the ACNC.

CCC's Head Office is located at Level 2, 11 Murray Rose Avenue, Sydney Olympic Park NSW 2127.

The organisation is governed by a Board that meets bimonthly and is supported by three specialist sub committees:

- › Finance, Investment & Remuneration Committee
- › Audit, Risk & Governance Committee
- › Community Advisory Committee

CCC operates within a comprehensive legislative and regulatory environment, including but not limited to:

- › Cemeteries and Crematoria Act 2013 (NSW)
- › Crown Land Management Act 2016 (NSW)
- › Public Health Act 2010 (NSW)
- › Australian Charities and Not for profits Commission Act 2012 (Cth)
- › Catholic Cemeteries and Crematoria Trust Act 2024 (NSW)

These frameworks guide CCC's governance, operational responsibilities, and stewardship of Crown land and perpetual care obligations.



Our Governance Framework

CCC's approach to managing modern slavery risks is underpinned by a structured governance framework that embeds oversight, accountability, and continuous improvement across our operations. This framework continues to guide CCC's procurement practices.

The procurement function is overseen by the Chief Financial Officer, ensuring strong alignment between financial governance, supplier engagement, and ethical sourcing practices.

To strengthen organisational capability, CCC established a Modern Slavery Working Group (MSWG) in 2022. The MSWG brings together representatives from Finance, Human Resources, and Marketing to coordinate CCC's corporate response to modern slavery. Its responsibilities include:

- Advising on modern slavery risks
- Supporting implementation of the Modern Slavery Action Plan

- Overseeing supplier engagement and due diligence activities
- Promoting awareness and capability across the organisation

In 2025, the MSWG met twice to review progress, assess emerging risks, and support the ongoing development of CCC's anti slavery initiatives.

CCC's modern slavery governance structure includes the following layers of oversight:

1. Board
2. Audit, Risk & Governance Committee (ARGC)
3. Chief Executive Officer
4. Modern Slavery Working Group
5. Chief Financial Officer

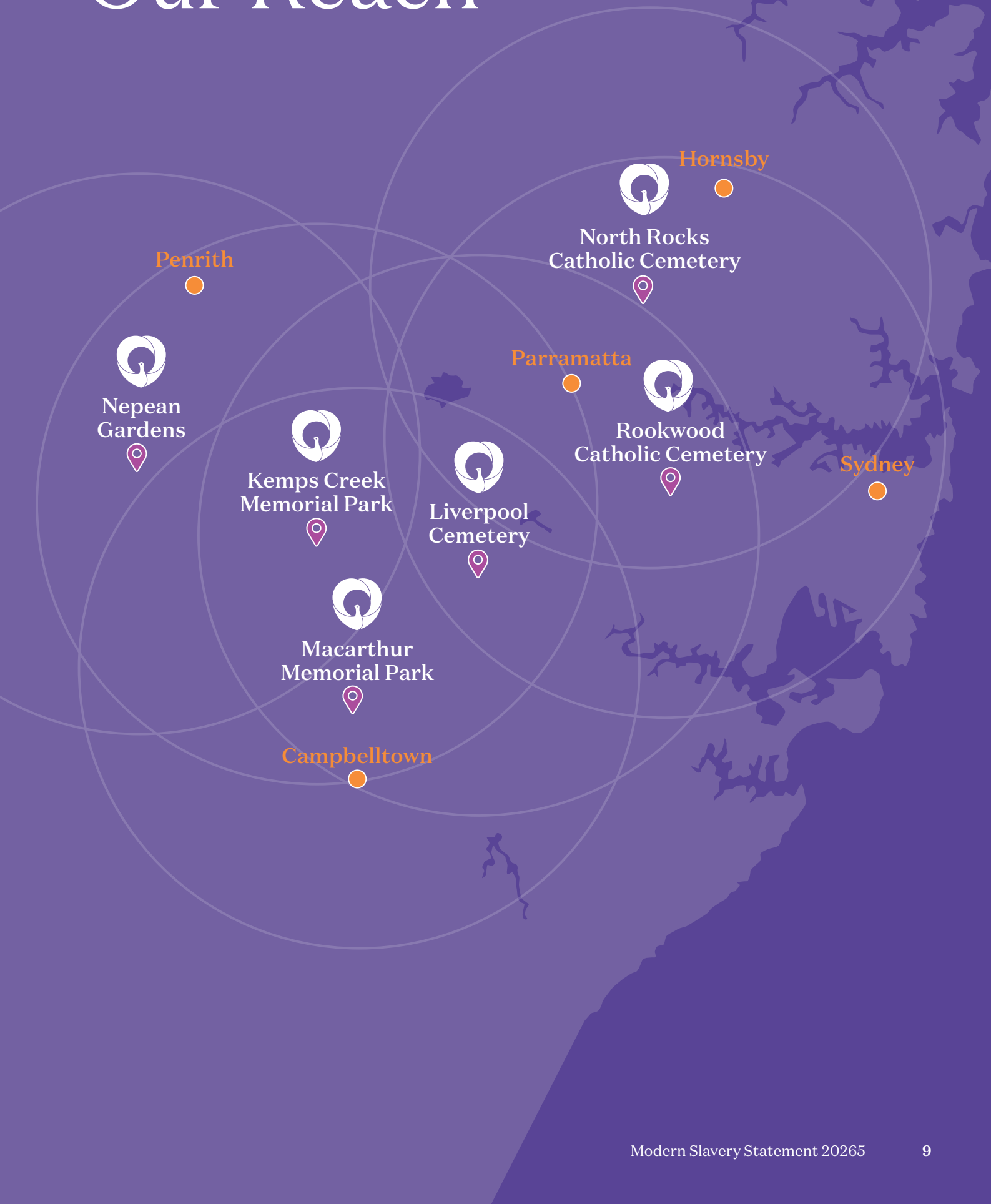
This structure ensures that modern slavery risk management is embedded across strategic, operational, and procurement functions, with clear lines of accountability and reporting.

Our Operations

CCC manages a network of cemeteries across Western Sydney, providing dignified burial and memorial services that honour the diverse cultural and religious needs of the communities we serve. Our current operational footprint includes four established cemeteries located in Rookwood, Kemps Creek, Liverpool, and Macarthur Memorial Park, which was completed in April 2025 and is now fully operational. These sites form the core of our service delivery and long term stewardship responsibilities.

CCC also oversees the operations of North Rocks Catholic Cemetery, ensuring continuity of care, ongoing maintenance, and pastoral support for families connected to this historic site. Together, these operations reflect CCC's commitment to delivering accessible, compassionate, and enduring cemetery services across Western Sydney. Our work is supported by strong governance, active community engagement, and long term planning to ensure that our services remain sustainable, respectful, and responsive to community needs.

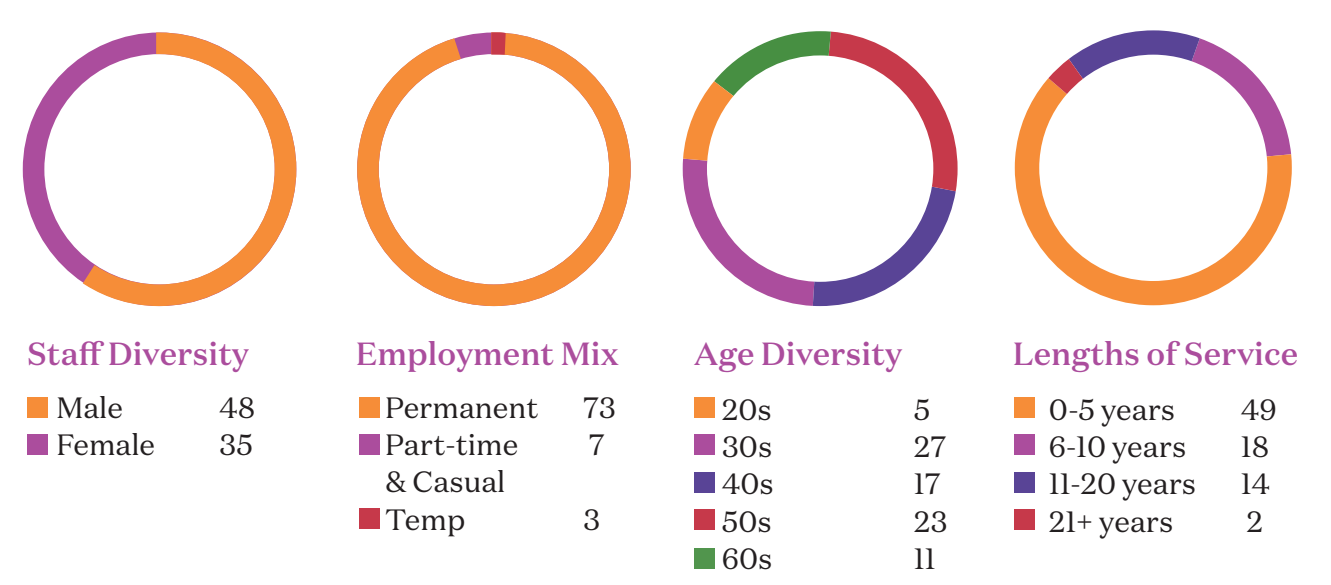
Our Reach



Our Organisation



Our Team



Our Supply Chain

CCC maintains a diverse supplier base comprising both short-term engagements and long-term strategic partnerships. Procurement arrangements vary by category: goods are typically sourced under supplier-defined terms, while service contracts are negotiated to align with CCC’s operational, ethical, and risk management requirements.

In addition to suppliers, CCC works closely with community groups and funeral directors, who play an important role in service delivery across its cemeteries. CCC does not participate in joint ventures.

Procurement governance was strengthened through the full implementation of the Procurement Strategy on 1 April 2022. This established a centre-led procurement model and introduced a centralised “one stop shop”

procurement portal. The model enables consistent oversight of supplier onboarding, contract management, and the administration of common-use contracts, which represent a significant portion of CCC’s total expenditure.

During the reporting period, CCC engaged 455 direct suppliers, with total procurement spend exceeding \$32.3 million. The majority of this expenditure was directed to Australian-based suppliers, supporting local industry and improving supply chain visibility.

Where international supply chains are involved, particularly in categories such as stone, ICT hardware, and construction materials, CCC recognises the increased exposure to modern slavery risks and continues to strengthen due diligence processes.

Criteria 3: Modern Slavery Risk



CCC undertook a structured assessment of modern slavery risk across its supply chain using the ACAN Category Risk Taxonomy. This framework enabled identification of procurement categories with elevated inherent risk based on factors such as:

- › High-risk geographic exposure
- › Labour-intensive industries
- › Complex, multi-tier supply chains with limited visibility

The assessment identified several higher-risk categories, including:

- › Construction
- › Graves and monuments
- › Landscaping
- › Labour hire
- › Cleaning and security services
- › ICT hardware
- › Uniforms and furniture

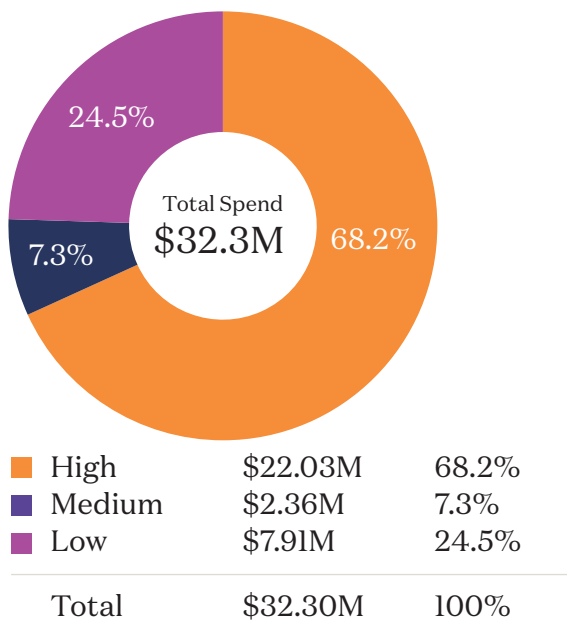
These categories may involve vulnerable worker populations, reliance on imported materials from higher-risk regions, or subcontracting arrangements that reduce transparency.

Insights from this analysis informed the development of CCC's Modern Slavery Risk Dashboard, which consolidates procurement and supplier data to provide a clearer view of inherent risk exposure. The dashboard supports a more targeted and proactive approach to supplier engagement and due diligence.

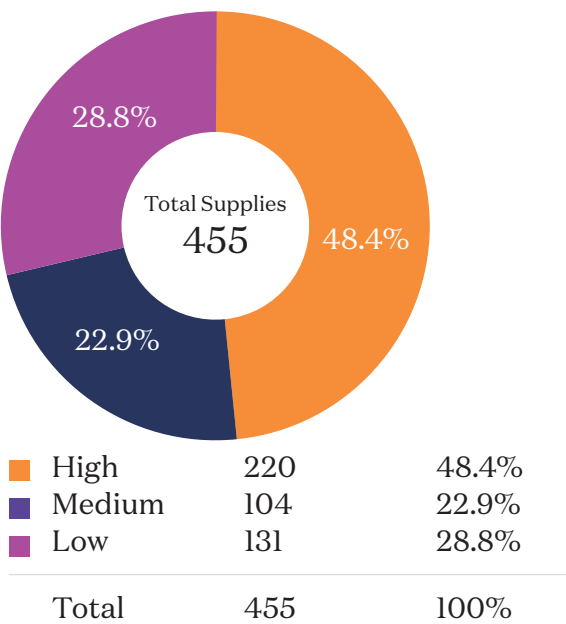
The dashboard is not intended to determine actual modern slavery risk at the supplier level. Instead, it highlights categories where further investigation is warranted. Determining actual risk requires deeper analysis, including supplier engagement, documentation review, and insights from contract managers and operational stakeholders.

Modern Slavery Risk Dashboard

Spend Risk Distribution



Supplier Risk Distribution



Key Insights:

68.2% of total procurement is in high-risk categories.
220 suppliers (48.4%) are classified as high risk.
Risk exposure is driven more by spend concentration than supplier count, with high-value categories contributing to overall modern slavery risk.

High-Risk Categories and Spend

This table summarises CCC’s highest risk procurement categories and associated annual expenditure. These categories inherently present greater modern slavery risk due to industry characteristics, workforce vulnerability, or geographic sourcing factors.

High-Risk Sector	Spend
Construction	\$12,571,582
Graves & Monuments	\$2,687,509
Landscaping	\$1,974,556
Facilities Management	\$1,159,922
Labour Hire	\$1,153,369
Catering and Venue Hire	\$579,456
Furniture	\$430,468
ICT	\$414,920
Cleaning	\$367,727
Office and Educational Supplies	\$281,337
Waste Management	\$231,763
Security	\$123,737
Uniforms	\$47,989

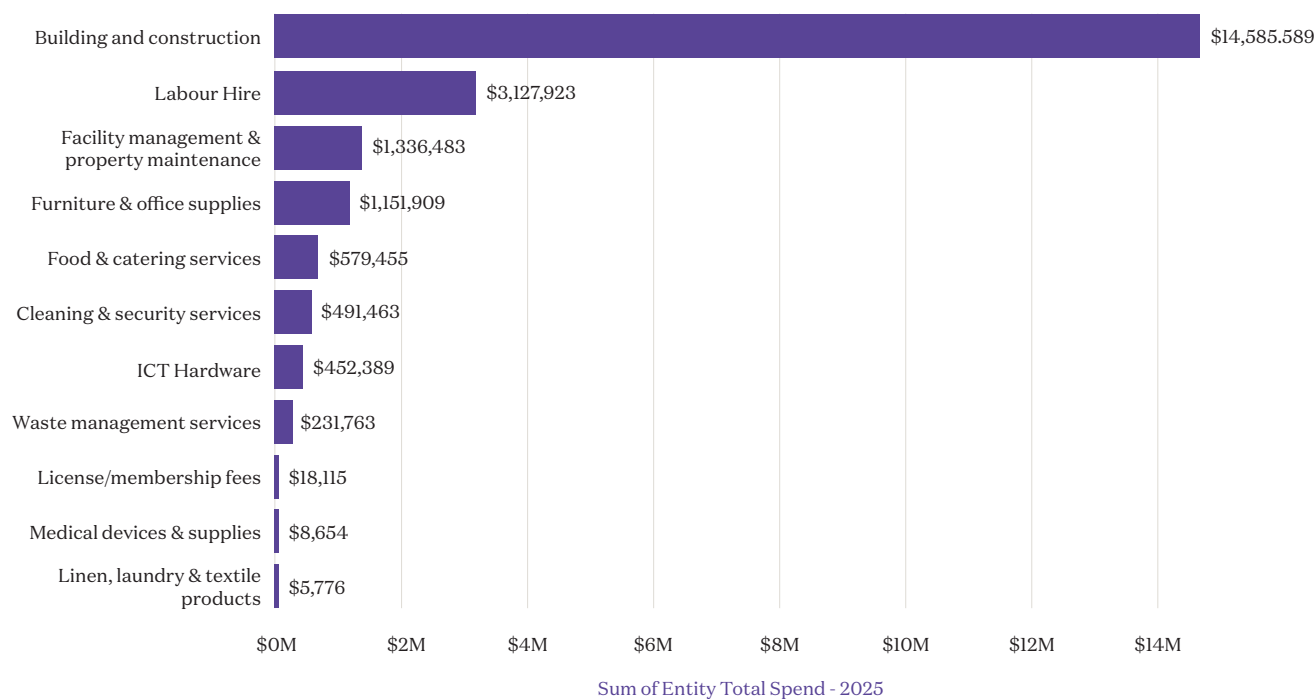
Four key factors are also used to determine the level of risk:

- **Geography:** the country or location where a good is made or service is delivered
- **Industry:** the sector in which the making of goods or delivery of service occurred
- **Commodity:** the raw materials or components that comprise the goods or products
- **Workforce vulnerability:** such as bonded visas, temporary migrants, women or children known to be employed in specific industry sectors

Domus 8.7: trends, cases, and risk intelligence identified through the Domus 8.7 remediation service, including grievances and remediation insights relevant to category and risk to workers.

Modern Slavery Risk by ACAN Taxonomy Category

This visual categorises CCC’s procurement activity according to the ACAN inherent risk taxonomy, providing a structured view of risk distribution across procurement categories.



Tier 1 Supplier Sourcing Countries

Overall inherent risk category ● high ● medium



Tier 1 suppliers source goods and services from a range of countries. Some of these regions present elevated modern slavery risk due to governance, labour conditions, or industry practices.

Internal Workforce Risk

CCC maintains strong confidence that the risk of modern slavery within its internal workforce is low. This is supported by robust policies, systems, and employment practices that ensure compliance with Australian workplace laws and uphold the dignity and wellbeing of staff.

Key safeguards include:

- **Employment practices:** Recruitment decisions are based on merit, equal opportunity, and compliance with relevant legislation.
- **Pay and conditions:** Pay rates are reviewed annually to ensure compliance with minimum standards and CCC's internal instruments.
- **Labour hire oversight:** Agencies supplying labour, including apprentices, must comply with award conditions and provide CCC with pay rate information for all personnel.
- **Anti-discrimination:** CCC's Code of Conduct reinforces respect, diversity, and inclusion.
- **Whistleblower protections:** CCC's Whistleblower Policy protects individuals who report illegal or improper conduct.

Criteria 4:

Actions Taken to Assess and Address Modern Slavery Risk

CCC continued to strengthen its modern slavery risk management activities during the reporting period, with a focus on awareness, monitoring, supplier engagement, and continuous improvement across procurement and governance functions.

Management Systems

CCC has established a comprehensive set of policies, processes, and an action plan to address modern slavery risks. The Board recognises the significance of these risks and provides oversight, while the Leadership Team ensures due diligence is embedded across operations.

Key elements include:

- › Defined governance structures supporting oversight and accountability
- › Controls to identify, manage, and report modern slavery risks
- › A dedicated Modern Slavery Working Group driving implementation and improvement
- › Regular review of policies and procedures to ensure alignment with best practice

Risk Management

CCC's risk management framework incorporates a dynamic feedback loop that integrates new insights and emerging risks. The organisation uses Risk Wizard software to:

- › Capture and record incidents
- › Assess severity and likelihood
- › Map corrective actions
- › Track progress and closure

Operational teams are regularly engaged to identify risks beyond wage compliance,

ensuring a holistic view of potential vulnerabilities. This system enables proactive risk management and prioritisation of resources.

Procurement and Supply Chain

Modern slavery considerations are embedded within CCC's procurement framework and contract management processes. Key actions include:

- › Integrating modern slavery criteria into tender evaluations
- › Investigating suppliers associated with adverse information
- › Communicating CCC's expectations to all suppliers
- › Conducting surveys with potentially high risk suppliers to assess their awareness and controls
- › Using SEDEX data to identify risks within multi tier supply chains

While supplier performance is regularly monitored for quality and delivery, CCC continues to strengthen its approach to monitoring ethical and labour related performance indicators and including modern slavery awareness onto the performance evaluation assessment.

The ACAN Program provides supplier engagement support and data, enabling a systematic and comprehensive supply chain risk assessment. In 2025 the ACAN Modern Slavery Risk Management Program launched a new purpose-built data management platform - ROTA. ROTA centralises the ACAN Risk Management Program framework and facilitates supplier performance evaluation and engagement.

Stakeholder Engagement

CCC has communicated its commitments and expectations to internal and external stakeholders, reinforcing accountability for continuous improvement. Grievance mechanisms are available to staff, labour hire contractors, and customers through:

- › The Whistleblower Policy
- › The Complaints Policy

At present, these mechanisms do not extend to workers within CCC's supply chains, and this remains an area for future development.

Grievance Mechanism

CCC's Whistleblower Policy and Grievance Procedure support a culture of transparency and ethical behaviour. These mechanisms encourage stakeholders to report unethical, illegal, corrupt, or fraudulent practices. CCC continues to strengthen staff capability to identify and respond to indicators of poor labour practices, unsafe working conditions, or modern slavery.

All staff are required to complete annual Respect at Work training refresher via CCC's custom build online module, which includes CCC's grievance processes.

Remediation

CCC is committed to ensuring appropriate and timely remediation for individuals impacted by modern slavery, consistent with the UN Guiding Principles on Business and Human Rights and the Commonwealth Modern Slavery Act guidance. This includes:

- › Addressing harm and root causes
- › Working with responsible entities where CCC is directly linked to modern slavery
- › Implementing measures to prevent recurrence

CCC is a founding member of Domus 8.7.

Domus 8.7 was established as an agency of the Catholic Archdiocese of Sydney in 2020 as a key element of the ACAN Modern Slavery Risk Management Program. This collaborative approach to remediation is aligned with the Modern Slavery Act and Catholic Social Teaching which are centred on the needs, wellbeing and empowerment of people impacted.

Domus 8.7 provides CCC:

- resources that enable us to listen to workers (grievance channel)
- a 24/7 careline for workers on our sites, staffed by professional counsellors
- direct support to people impacted by modern slavery
- guidance and technical assistance to prevent, identify and remediate modern slavery
- a documented process to assess if an organisation has caused, contributed or is directly linked to modern slavery and modern slavery indicators

Investments

CCC is committed to responsible investment practices that align with its mission, Catholic values, and ethical expectations. CCC's Investment Policy is grounded in Catholic Social Teaching and informed by Mensuram Bonam – Faith Based Measures for Catholic Investors. It requires investment decisions to promote human dignity, uphold the common good, and avoid contributing to harm or exploitation.

The Ethical Statement within the Investment Policy requires investment managers, advisers, and underlying funds to assess and monitor investments against globally recognised norms relating to human rights, labour standards, environmental stewardship, and corruption. CCC applies an ethical investment framework that incorporates exclusion of activities incompatible with Catholic values, active stewardship and engagement with investment managers, and, where practicable, enhancement through investment in activities that support positive social and ethical outcomes.

As part of this framework, CCC receives regular ethical screening and proxy voting reports from its investment advisor, Russell Investments. Russell Investments is a member of Investors Against Slavery and Trafficking (IAST), supporting CCC's commitment to identifying, mitigating, and responding to modern slavery risks within investment portfolios.



Modern Slavery Action Plan

The Action Plan below outlines CCC's progress in strengthening its modern slavery risk management framework and sets out the next phase of planned activities. The achievements from 2020–2025 reflect the organisation's growing maturity, while the 2026 plan focuses on deepening supplier engagement, enhancing governance, and expanding capability across the organisation.

Achievements 2020–2025	Plan for 2026
› Established the Modern Slavery Policy. › Integrated modern slavery risk considerations into CCC's operations and supply chain processes. › Established the Modern Slavery Working Group (MSWG). › Promoted employee awareness through internal newsletters and communications. › Implemented anti slavery clauses in Purchase Orders. › Embedded modern slavery requirements into tendering processes. › Surveyed 60 high risk suppliers to assess their awareness and controls. › Continued active participation in the Australian Catholic Anti Slavery Network (ACAN). › Delivered modern slavery awareness presentations at staff Town Hall meetings. › Conducted annual reviews of modern slavery risks. › Re-surveyed potential high risk suppliers through ACAN to monitor progress. › Continued to promote modern slavery awareness among employees. › Used CCC's social media channels to promote modern slavery awareness within the community. › Renewed CCC's participation in ACAN for ongoing collaboration and capability building.	› Review procurement strategy and framework. › Conduct the annual review of modern slavery risks across operations and supply chains. › Re survey high risk suppliers to assess improvements in their modern slavery controls and transparency. › Strengthen supplier engagement by expanding the use of SEDEX and other ethical sourcing tools. › Appoint a Procurement Officer to strengthen procurement governance, supplier oversight, and ethical sourcing practices. › Continue CCC's participation in ACAN and adopt new tools and resources as they become available.

Criteria 5: Assessing Effectiveness



The ACAN activity data table provides a comparative measure of supplier engagement and program activities to measure CCC's progress.

Catholic Cemeteries and Crematoria Trust	Activity	2024	2025
Internal Staff	Hours spent on modern slavery activities	160	245
	Individual staff completed e-learning	0	0
	E-learning modules completed	0	0
External/Supplier Engagement	Total number of suppliers	519	455
	Number of suppliers across high-risk categories	39	170
	Number of ACAN Supplier Surveys completed	128	177
	Supplier staff attending capacity building webinars	12	1
	Invited to join Sedex	30	22
	Joined Sedex	38	12
	Sedex SAQ completed	7	15
	Social audits	0	0
	Corrective actions	0	0
Domus 8.7 External Referrals	Contacts made via worker voice/grievance mechanism	0	0
	Referrals for advise and assistance	0	0
	Individuals identified or referred for modern slavery assessment	0	0
	Individuals with modern slavery cases remediated	0	0

Criteria 6: Consultation with Owned or Controlled Entities



Catholic Cemeteries & Crematoria Limited (CCC Ltd) is the Trustee of the Catholic Cemeteries & Crematoria Trust (CCCT). Regular consultation on Modern Slavery occurs with the Board of CCC Ltd in their capacity as trustees of the trust.

Criteria 7: Any Other Relevant Information



No other relevant information to report.



**Catholic
Cemeteries +
Crematoria**

Rookwood Catholic Cemetery

Barnet Avenue, Rookwood, NSW 2134

Phone: 1300 114 997

enquiries@catholiccemeteries.com.au

www.catholiccemeteries.com.au

North Rocks Catholic Cemetery

North Rocks Road, North Rocks, NSW 2151

Phone: 1300 114 997

enquiries@catholiccemeteries.com.au

www.catholiccemeteries.com.au

Liverpool Cemetery

207 Moore St, Liverpool 2170

Phone: 02 9602 0344

info@liverpoolcemetery.com.au

www.liverpoolcemetery.com.au

Kemps Creek Memorial Park

230-260 Western Rd, Kemps Creek, NSW 2178

Phone: 02 9826 2273

admin@kempscreekcemetery.com.au

www.kempscreekmemorialpark.com.au

Macarthur Memorial Park

166-176 St Andrews Rd, Varroville NSW 2566

Phone: 1300 086 689

Email: info@mmpark.com.au

www.mmpark.com.au

Head Office

Level 2, Murray Rose Avenue

Sydney Olympic Park, NSW 2127

enquiries@catholiccemeteries.com.au

MODERN SLAVERY STATEMENT 2025

1 January 2025 – 31 December 2025

Disclosure Note

This statement has been made on behalf of Catholic Education Diocese of Bathurst Limited. This statement covers all entities owned or controlled by Catholic Education Diocese of Bathurst Limited. Covering the reporting period 1 January 2025 to 31 December 2025 this statement focuses solely on work performed by the Catholic Education Diocese of Bathurst Limited ABN 15679 442 089. CEDB Head Office is located at: 225 Gilmour Street, Kelso NSW 2795 www.bth.catholic.edu.au cedb@bth.catholic.edu.au



We acknowledge the Wiradjuri, Gamilaraay and Wailwan peoples, the traditional custodians of the lands on which our parishes, schools and offices reside. We also pay our respects to elders past and present.

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Approval and Signature

This Modern Slavery Statement was approved by the principal governing body of Catholic Education Diocese of Bathurst as defined by the Modern Slavery Act 2018 (Cth) ("the Act") on 15 May, 2026. This modern slavery statement is signed by a responsible member(s) of Catholic Education Diocese of Bathurst as defined by the Act.

Those of us who have responsibility for the stewardship of goods need to develop a practical alertness to supply chains that may be compromised by links to modern slavery and human trafficking. Catholic Education Diocese of Bathurst and its schools are committed to this vigilance and the responsible practices that it leads us to adopt.

Pope Leo XIV has strongly condemned modern slavery, labelling human trafficking a "grave crime against humanity" that exploits the vulnerable and undermines global peace. In messages surrounding the 12th World Day of Prayer and Awareness against Human Trafficking (February 8, 2026), he emphasized that true peace is "unarmed and disarming" and rooted in the protection of human dignity.

Action against modern slavery is fundamental to Catholic Social Teaching. As a Catholic entity, we acknowledge our role in working towards the eradication of modern slavery practices from our operations and supply chains. It is vital for us to maintain our reputation as an ethical organisation which generates confidence in our service to the community.

We acknowledge the impact that commercial activities, including ours, can have on vulnerable people through modern slavery practices. We have a responsibility to take practical action to manage risk in our operations and supply chains.



Christina Trimble

Christina Trimble
Executive Director of Schools
15 May, 2026



Peter Turner

Peter Turner
Chairperson CEDB Board
15 May, 2026



Catholic Education Diocese of Bathurst Limited
ABN 15 679 442 089
2026 Modern Slavery Statement
1 January 2025 to 31 December 2025
225 Gilmour Street, Kelso NSW 2795
www.bth.catholic.edu.au
cedb@bth.catholic.edu.au

CRITERION 1

About Us

Catholic Education Diocese of Bathurst (CEDB) provides a diverse range of educational options, from small primary schools to large secondary schools. More than 10,000 students attend 33 Catholic schools in the diocese, enjoying high educational standards in contemporary, Christ-centred learning environments. In partnership with parents and parishes, our schools nurture a relationship with Jesus, educate for academic excellence and prepare students for lifelong service in a faith-centred community.

Catholic schools are first and foremost religious schools. Our Catholic schools provide a unique opportunity for students to grow, both in relationship with God, and also in knowledge, understanding, wisdom and life skills, in a way that promotes the integration of their faith and their daily lives.

CRITERION 2

Operations and Supply Chain

2.1 Corporate Structure

Catholic Education Diocese of Bathurst at all levels of management, is committed to maintaining and enhancing strong governance. Our Governance Risk Structure is aligned with our vision to provide high quality Catholic Education in the Diocese of Bathurst.

Effective 1 January 2025, with the approval of both the Australian Securities and Investments Commission (ASIC) and the Australian Charities and Not-for-profits Commission (ACNC), Catholic Education Diocese of Bathurst (CEDB) was formally incorporated as Catholic Education Diocese of Bathurst Ltd.

The organisation is governed by a Board of Directors. The Executive Director of Schools has retained her existing responsibilities and authority and now reports directly to the established Board. The Leadership Team, who oversee the operations and review of activities in the areas of Human Resources, Information Communication Technology, Finance, Faith, Learning and Teaching, Stewardship, and School Improvement and reviews anti-slavery initiatives.

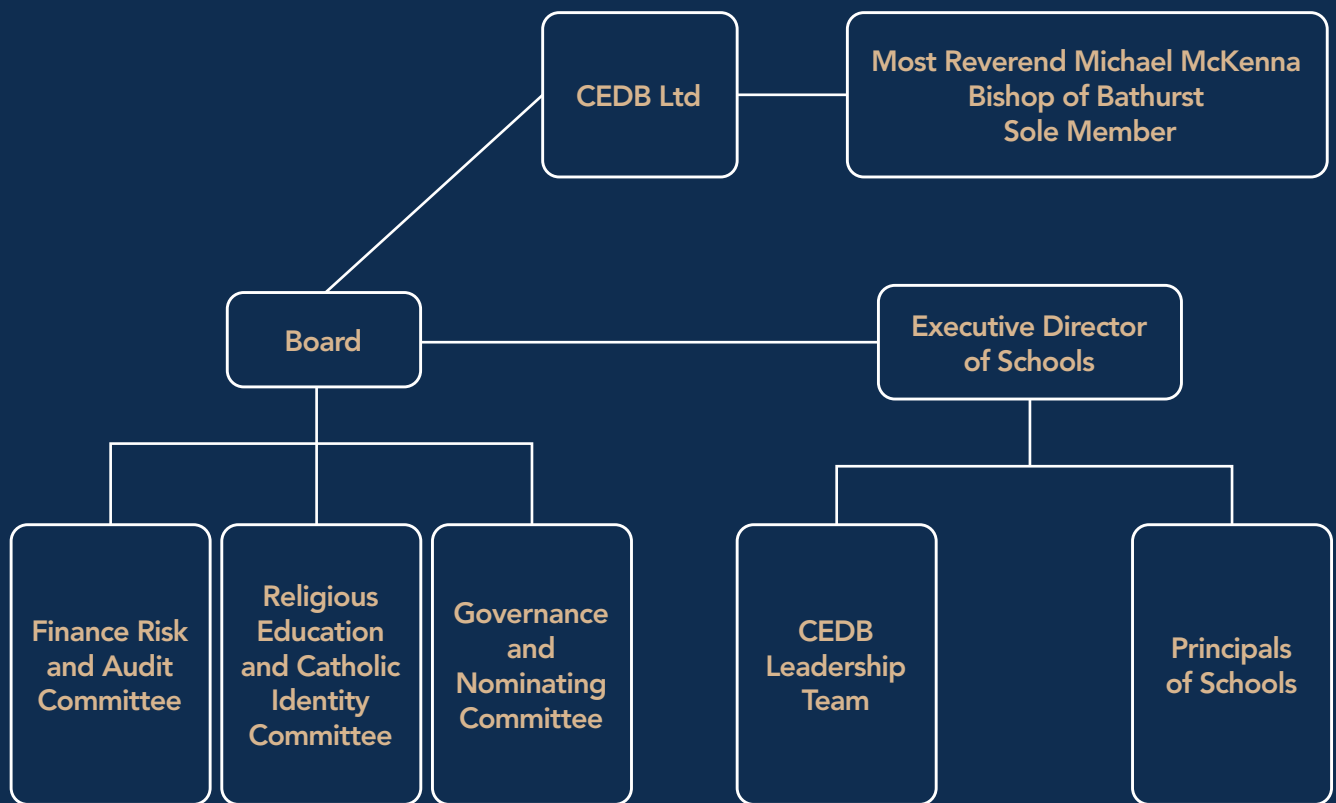
In relation to modern slavery risk management the Leadership Team:

- reviews policy and procedures
- monitors the effectiveness of the management system and risk framework
- maintains knowledge of risks relevant to modern slavery
- ensures appropriate training is undertaken throughout the system
- requests suppliers use diligence in addressing modern slavery procurement
- share the Self-Assessment Questionnaire results with CEDB Board and its committees, as required.

The Modern Slavery Working Group meets on a quarterly basis and includes representation from Human Resources, Risk, WHS, Information Communication Technology, Finance and Facilities teams.

The Head of HR, Risk and WHS is responsible for timely escalation of modern slavery issues to the Board.

2.2 Organisational chart



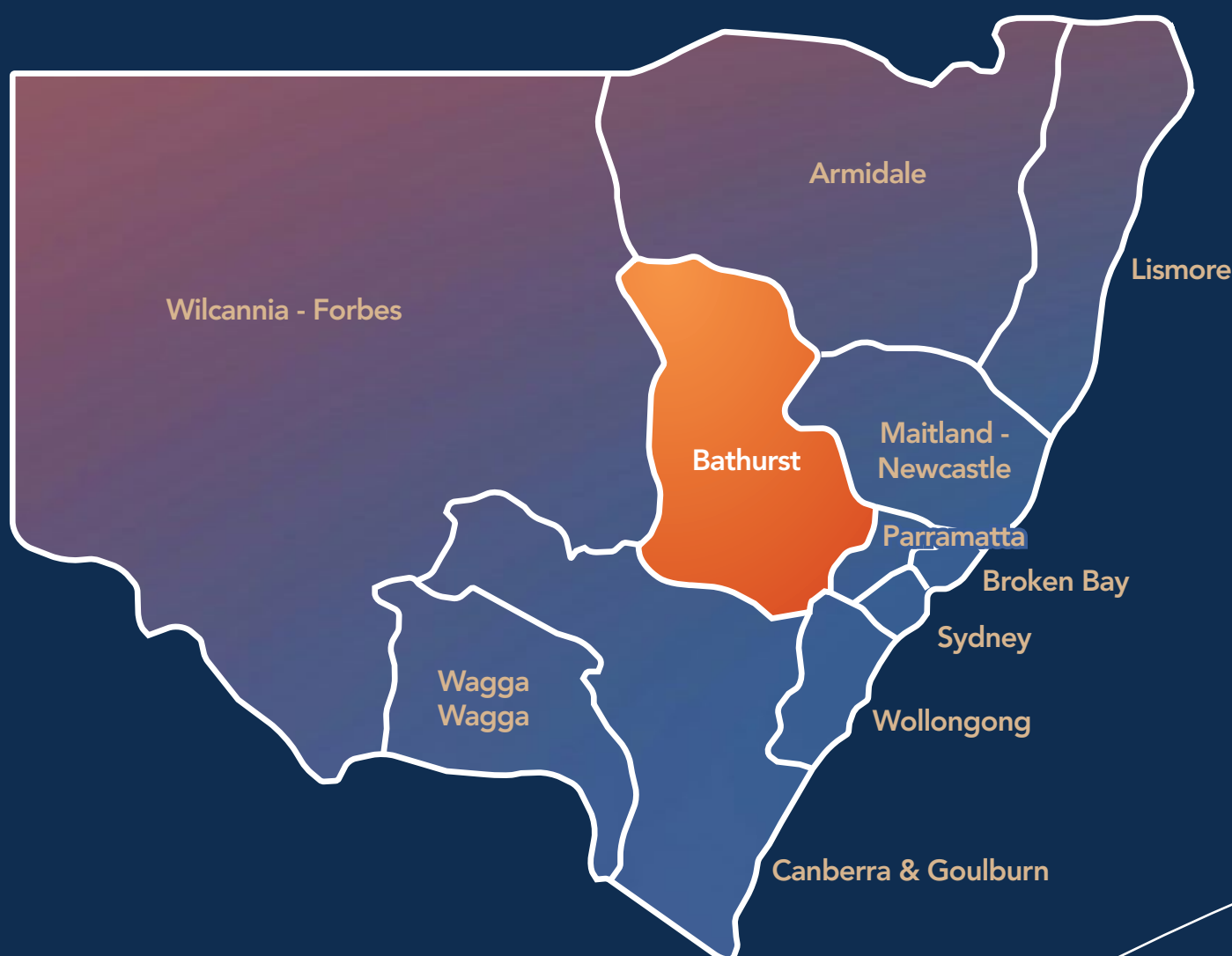
CRITERION 2

Operations and Supply Chain

2.3 Geographic areas of operation

The Diocese of Bathurst is located in the Central West of New South Wales, Australia, with the offices being in Bathurst and Dubbo. It covers a large part of the state from Cowra in the South to Coonamble and Baradine in the

north, from Eugowra in the west to Lithgow in the east. It includes the three large cities of Bathurst, Orange and Dubbo; regional areas such as Cowra, Mudgee, Wellington, Lithgow; and small, rural and isolated communities.



2.4 Our Operations

Catholic Education Diocese of Bathurst is engaged in providing high quality Catholic education to students from Kindergarten to Year 12 in the Diocese of Bathurst.

The Diocese has 33 schools which are either Primary schools - Kindergarten to Year Six; Central Schools - Kindergarten to Year Ten, Kindergarten to Year Twelve; or Secondary Schools - Year Seven to Year Twelve.

Catholic Education Diocese of Bathurst employs approximately 2000 staff and educates approximately 10,000 students. The diocese caters for families in 17 parishes.

Historically the diocese has had a wide variety of arrangements for the supply of goods and services to schools and the two CEDB offices, located in Bathurst and Dubbo. These arrangements had been developed to address the needs of school communities and often involved local purchasing and arrangements which maintained supplies and employment in the local community.

In the last decade, diocesan procurement has become more widespread with the supply of goods and services based on 'fit for purpose' procurement and assisting with reducing the procurement burden upon school Principals and school administration staff.

CEDB is part of the Catholic Diocese of Bathurst and is a direct employer of teachers, administration staff, and support staff. Some contractors are also engaged and are usually employed in the construction, building or cleaning services sectors.

CEDB works collaboratively with other Catholic agencies such as the Catholic Diocese of Bathurst (Chancery), Centacare and the Catholic Development Fund.

CEDB has an annual turnover of over \$226 million and 2537 suppliers.

CEDB has an annual
turnover of over

**\$226
million**

and

**2,537
suppliers**



CRITERION 3

Modern Slavery Risks

For Catholic entities, modern slavery risks are defined by the ACAN Category Risk Taxonomy, a classification standard that identifies severity of actual or potential harm to people (saliency) in spend categories.

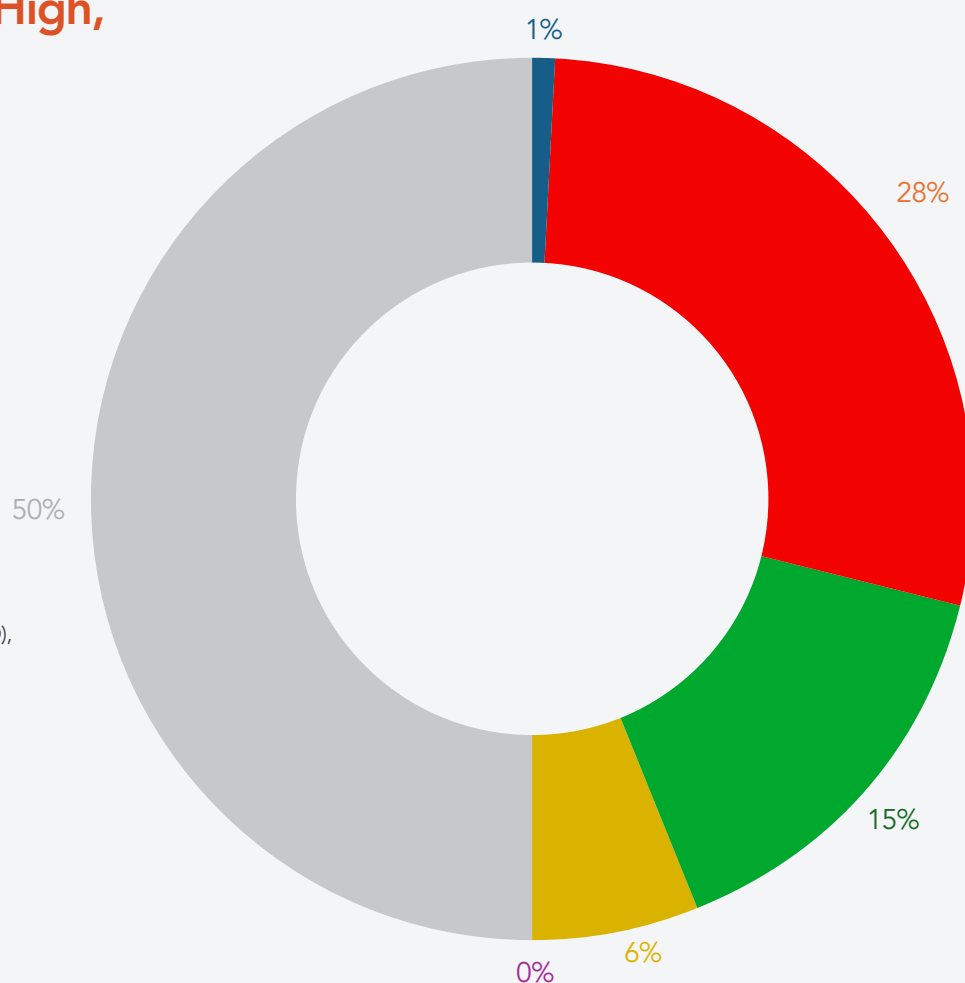
This allocation facilitates the assessment of where the expenditure is going and with whom. The CEDB has a total of 2537 suppliers and purchased goods and services worth \$49million during the reporting period.

Representation of High, Medium and Low Risk Suppliers

High	28%
Low	15%
Medium	6%
Not in Scope	0%
Other	1%
Grand Total	50%

The ACAN Category Risk Taxonomy is based on sources such as:

- the Global Slavery Index
- the International Labor Organisation (ILO), including definitions of modern slavery
- the Bureau of International Labor Affairs (ILAB), U.S Department of Labor
- the Global Child Forum and UNICEF



Supplier Engagement Overview

ACAN Entity File

ENTR-14 | Catholic Education Diocese of Bathurst

Total suppliers

2,537

Suppliers in High Risk procurement categories

1,199

ACAN Supplier Surveys completed

528

ACAN Supplier Surveys completed in 2026

6

Suppliers identified for Sedex Onboarding

62

Suppliers completing e-learning

19

Sourcing Countries for Tier 1 Suppliers

Overall inherent risk category ● high ● low ● medium



Supplier email shared

2,398

Supplier communication

3,056

Audits in 2025

2

Audits Findings in 2025

16

Supplier Screening - ACAN Collated

Enhanced 3rd Party Supplier Screening

529

3rd Party Supplier Screening - High and Medium Risk

25

Suppliers on Sedex

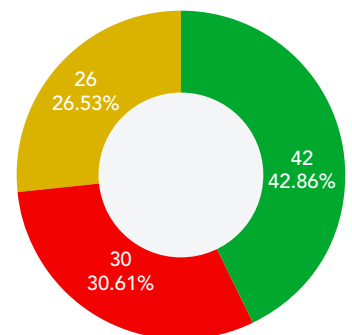
76

SAQs Completed

70

Sedex SAQ Risk Category

● High	30 (30.61%)
● Medium	26 (26.53%)
● Low	42 (42.86%)



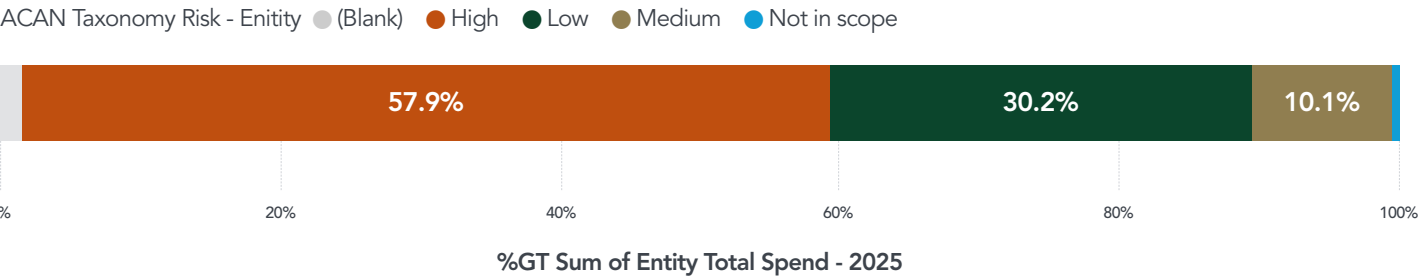
Five key factors are also used to determine the level of risk:

- Geography: the country or location where a good is made or service is delivered
- Industry: the sector in which the making of goods or delivery of service occurred
- Commodity: the raw materials or components that comprise the goods or products
- Workforce vulnerability: such as bonded visas, temporary migrants, women or children known to be employed in specific industry sectors
- Domus 8.7: trends, cases, and risk intelligence identified through the Domus 8.7 remediation service, including grievances and remediation insights relevant to category and risk to workers.

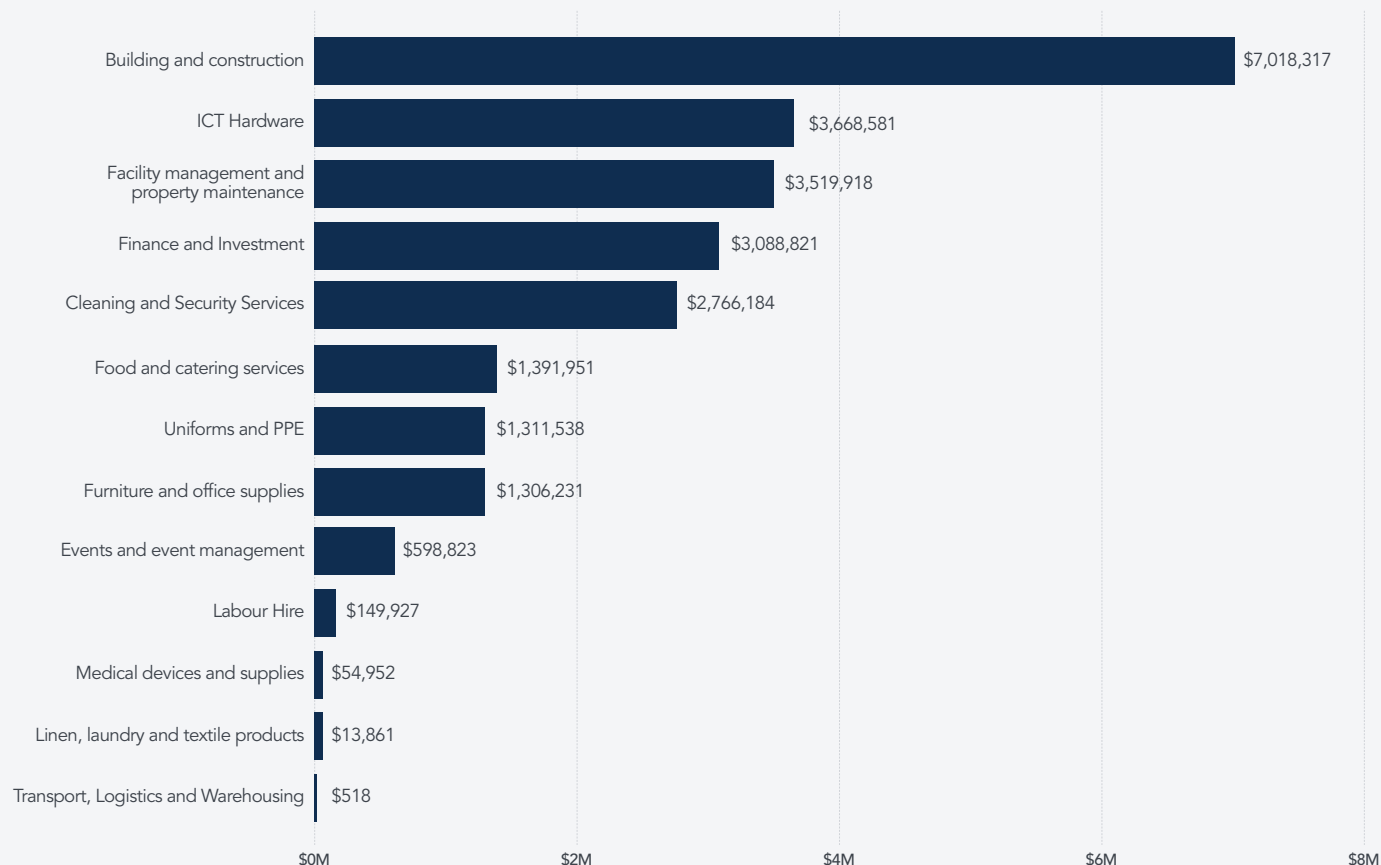
Classification

High Risk	Medium Risk	Low Risk
Building and construction	Advertising & Marketing	Professional services
Cleaning and Security	ICT Software and network services - onshore	Financial expenses
Events and event management	Utilities	Government and agency fees
Facility management and property maintenance	Fleet management, consumables and maintenance	License / membership fees
Finance and Investment	Travel and accommodation	Note: The following categories are Not in Scope of the ACAN Category Risk Taxonomy - Pastoral - Payroll (excluding labour-hire and sub-contracting)
Food and catering services	Print / Mail Provider	
Furniture and office supplies		
ICT Hardware		
ICT Software and network services - offshore		
Labour Hire		
Linen, laundry and textile products		
Medical devices and supplies		
Transport, logistic and warehousing		
Uniforms and PPE		
Waste management services		

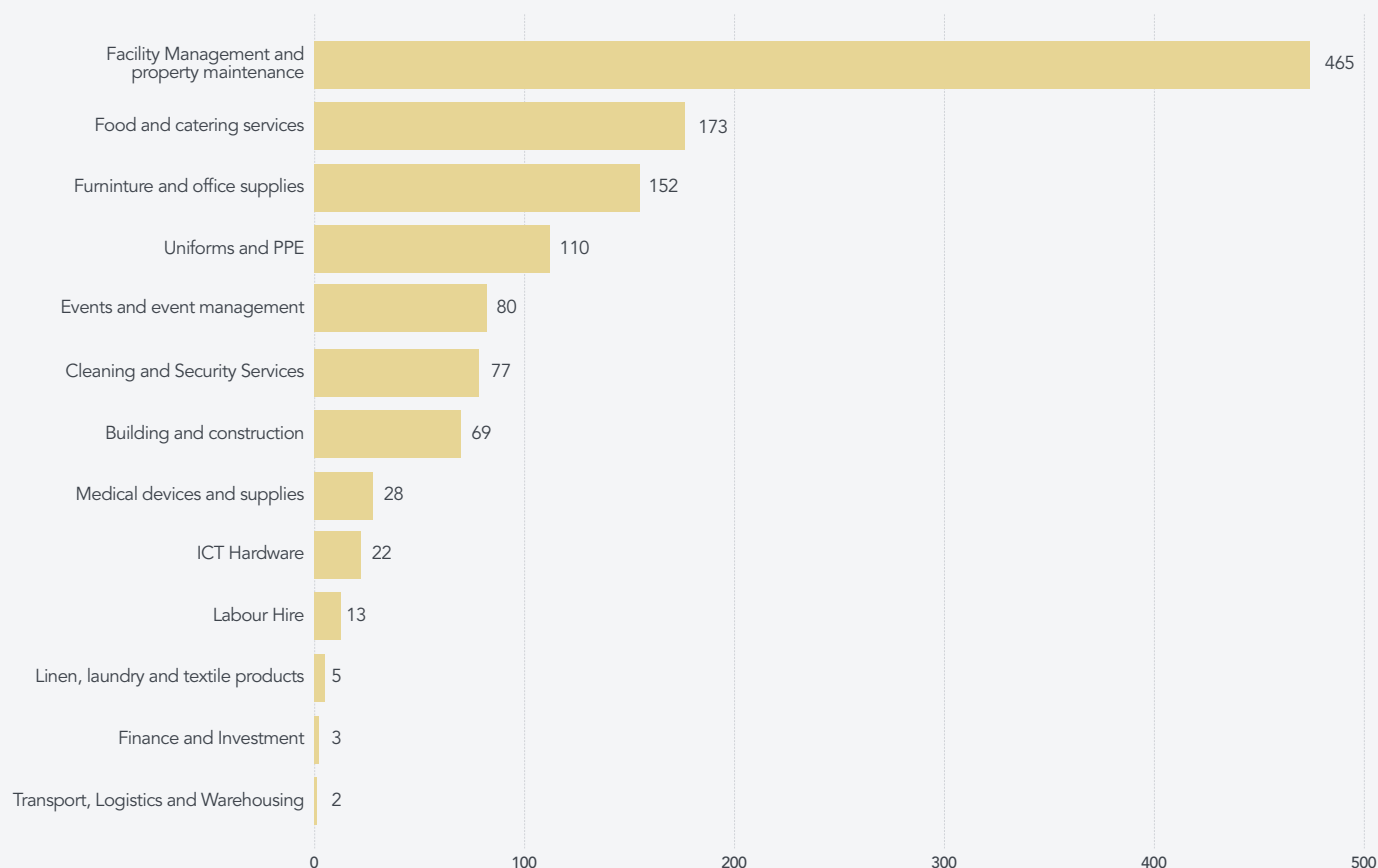
%GT Sum of Entity Total Spend - 2025 by ACAN Taxonomy Risk - Entity



Sum of Entity Total Spend - 2025 by ACAN Taxonomy Category - Entity



Count of Key by ACAN Taxonomy Category - Entity



CRITERION 4

Risk Management Actions

ACAN Supplier Engagement

The ACAN Program provides supplier engagement support and data, enabling a systematic and comprehensive supply chain risk assessment. In 2025 the ACAN Modern Slavery Risk Management Program launched a new purpose-built data management platform - ROTA. ROTA centralises the ACAN Risk Management Program framework and facilitates supplier performance evaluation and engagement.

- 1 Evaluation of the modern slavery risk within operations and supply chains, using the ACAN Risk Taxonomy
- 2 ACAN Supplier Survey to identify supplier revenue, number of employees, countries of origin for goods sourced overseas, workforce contractual arrangements and Sedex membership status.
- 3 Supplier education on modern slavery and risk management in key areas: cleaning, building and construction, procurement of labour, labour hire and services, sourcing goods from overseas, grievance mechanisms and remediation
- 4 Onboarding suppliers to Sedex requires a business address, contact details and goods or services provided
- 5 Sedex Self-Assessment Questionnaire (SAQ) helps suppliers to evaluate their practices against established standards and identify areas for improvement
- 6 Desktop review to identify key actions required from suppliers
- 7 Enhance supplier screening using Know Your Client (KYC) intelligence software
- 8 Corporate Social Compliance Audits provide a point in time, objective and independent verification process of supplier alignment with local laws and worker wellbeing standards
- 9 Domus 8.7 Index modern slavery statement assessment on selected suppliers in high-risk categories
- 10 ACAN Prequalified Supplier Directory - a list of preferred suppliers accessible to Catholic organisations



4.1 Domus 8.7

Catholic Education Diocese of Bathurst is a founding member of Domus 8.7. Domus 8.7 was established as an agency of the Catholic Archdiocese of Sydney in 2020 as a key element of the ACAN Modern Slavery Risk Management Program. This collaborative approach to remediation is aligned with the Modern Slavery Act and Catholic Social Teaching which are centered on the needs, wellbeing and empowerment of people impacted. CEDB is committed to ensuring it provides appropriate and timely responses to people impacted by modern slavery and to support this has systems in place to report anonymously through the CEDB Whistleblower Policy and Stopline service.

Domus 8.7 provides Catholic Education Diocese of Bathurst:

- resources that enable us to listen to workers (grievance channel)
- a 24/7 careline for workers on our sites, staffed by professional counselors
- direct support to people impacted by modern slavery
- guidance and technical assistance to prevent, identify and remediate modern slavery
- a documented process to assess if an organisation has caused, contributed or is directly linked to modern slavery and modern slavery indicators

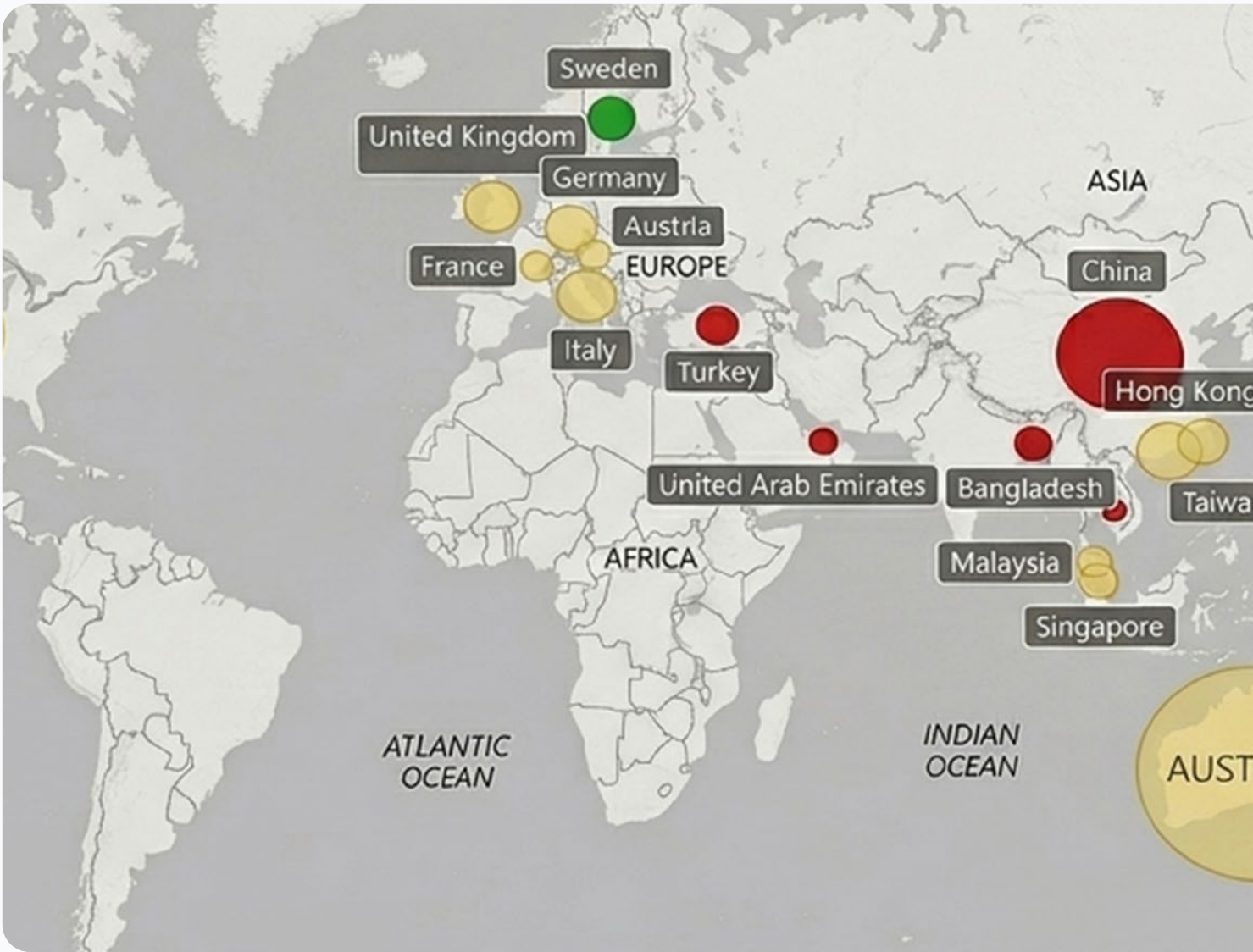
Domus 8.7 empowers people impacted by modern slavery to have choice and control over what forms of remediation are meaningful to them and to engage safely with business/ supply chain actors. Supports may include:

- modern slavery indicator assessment
- needs assessment, case coordination, response and remediation planning
- referrals to community, social services, unions
- transport, accommodation, financial and food support
- legal support, referrals, accompaniment and advocacy
- job training, retraining and redeployment
- accompaniment and advocacy to engage with government and law enforcement agencies
- opportunities to contribute lived expertise to improve modern slavery responses

The Domus 8.7 Advisory Committee Members also include a person with lived expertise, Mr Moe Turaga. Domus 8.7 is a registered charity with the Australian Charities and Not-for profits Commission (ACNC) and is an endorsed Public Benevolent Institution with Deductible Gift Recipient (DGR) status. ABN 244 72497189

Sourcing Countries for Tier 1 Suppliers

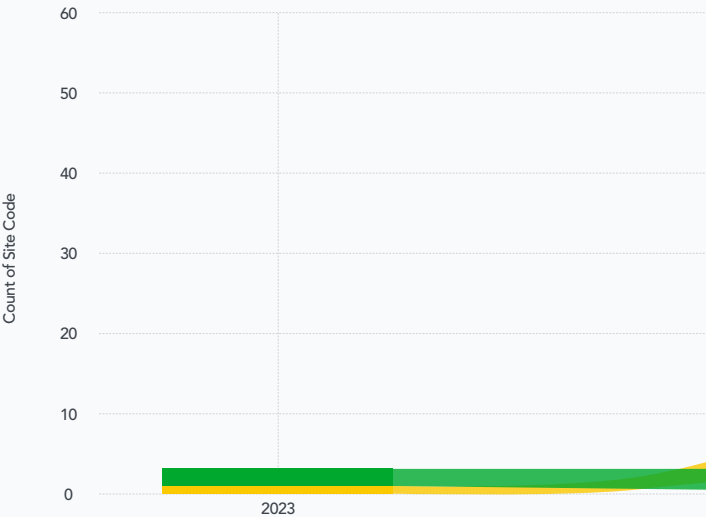
Overall inherent risk category ● high ● low ● medium

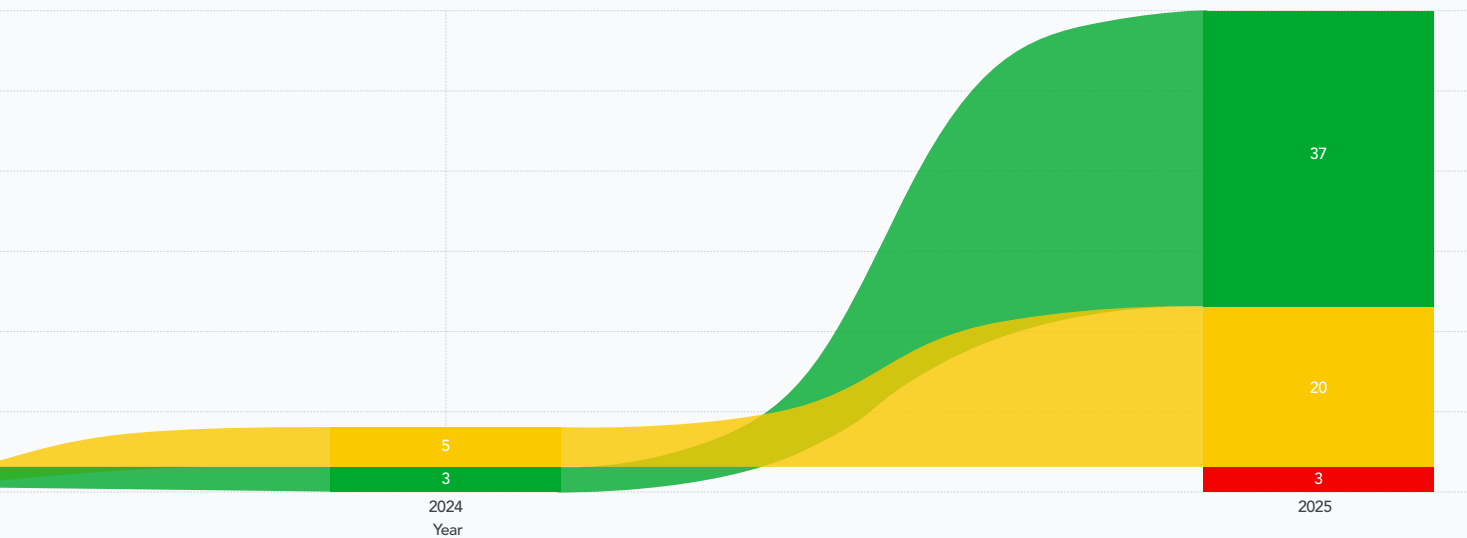


Sedex SAQ last Completed Date

A review of the self-assessment questionnaire (SAQ) undertaken by our suppliers has determined that three (3) high risk suppliers, twenty (20) medium risk suppliers and thirty-seven (37) low risk suppliers, with a total of sixty (60) completed the questionnaire. In 2024 as a comparison, a total of eight suppliers had completed the questionnaire, showing a 600% increase in engagement.

Combined risk category ● high ● low ● medium





CRITERION 5

Effectiveness of Steps taken under Criterion 4

Continuous Improvement

Collaboration is at the heart of accelerating progress. This also includes opportunities to comparatively measure social, environmental and governance (business ethics) risks and actions with peers in our network.

In its foundational stages, Catholic Education Diocese of Bathurst used an internally devised ACAN framework to measure progress. This bespoke approach reflected the unique priorities, constraints, and practices across Catholic organisations.

In 2025, the ACAN Program adopted a globally recognised risk measurement system through SEDEX. This aligns reporting entities with a methodology that combines global data about risks in different countries and industries with site-specific information from the SEDEX platform. SEDEX regularly updates the methodology to ensure it is aligned with new and emerging risks. Therefore, completion of the SEDEX SAQ completed by Catholic Education Diocese of Bathurst is a substantial measure of continuous improvement year on year. Below is an explanation of how scoring is calculated using the SEDEX SAQ and Catholic Education Diocese of Bathurst 2025 risk scores and management controls that will serve as our benchmark for continuous improvement.

Explanation of Scoring

Combined Risk Score 0/10 - calculated from inherent risk and site characteristics, adjusted for management controls and audit results. The score is broken down by pillar and highlights strengths and opportunities to focus our efforts on key areas that drive ethical and sustainable practices.

Inherent Risk Score 0/10 - predicts potential risks based on a country/region, and sector. Spanning all four pillars, this score is broken down by topics. It can be used as a baseline to identify and prioritise areas for improvement in operations. This score shows the natural risks of doing business in a specific country or sector. It does not include any details about individual sites.

Labour Standards Pillar - assesses location and industry factors that could increase labour risks, such as vulnerable worker populations or high rates of workplace violations.

Health and Safety Pillar - considers regional and industry-specific health and safety risks, including local regulations and industry accident rates.

Business Ethics Pillar - assesses industry and location risks related to unethical practices, such as high corruption levels or weak regulatory oversight.

Environment Pillar - examines the environmental impact of the site's industry and location, such as pollution levels or resource use that may create regulatory or compliance risks.

Site Characteristics Risk Score 0/10

Highlights potential risks based on your suppliers' SAQ responses in the Labour Standards and Health and Safety pillars. This score can be used to assess and support the implementation of policies and processes that mitigate workplace risks within your supply chain. For the Environment SAQ, site characteristics consider the type of work, business and location (e.g. proximity to sensitive areas). For the Core SAQs, risks are assessed based on the nature of the work, such as exposure to heavy machinery or hazardous materials.

Labour standards - reflects labour-related risks like employment practices, workers rights and wages based on SAQ responses. High-risk activities in this area can raise the score.

Health and Safety - based on SAQ responses to questions about site-specific health and safety factors, such as equipment usage, handling of chemicals or accident risks.

CEDB Entity Risk Scores

Combined risk score

3.8/10

Low risk

Score breakdown by pillar

Highlight strengths and opportunities to help businesses focus their efforts on key areas that drive ethical and sustainable practices.

Inherent risk ● 3/10 (Low risk)

Labour standards

2.9/10

Health and safety

2.4/10

Business ethics

1.8/10

Environment

3.6/10

Site characteristic risk ● 4.6/10 (Medium risk)

Labour standards

5.2/10

Health and safety

3.4/10

Management Controls Score 0/5

This score measures how well policies or processes are in place to reduce the risks from the site characteristics. It is also based on answers in the SAQ. A Poor score of 0-0.9 indicates that there are few or no controls in place. An Advanced score of 4-5 indicates that there are exemplary controls that exceed compliance and drive innovation.

Labour standards - evaluates policies and processes to ensure fair labour standards and worker protections are effectively managed.

Health and Safety - reviews the adequacy of safety protocols, emergency preparedness and training efforts to manage health and safety risks on site.

Business Ethics - evaluates controls against unethical practices such as anti-bribery policies, compliance with legal standards and transparent operations.

Environment - looks at policies managing environmental impact, resource efficiency and waste reduction practices to align with sustainability standards.

Management controls 4.0/5 (Advanced)

Measures suppliers risk management (0-5, with 5 at best) to assess effectiveness and target improvements.

Labour standards	Health and safety	Business ethics	Environment
3.5 /5	4.9 /5	4.5 /5	- /5
Good	Advanced	Advanced	

Section title	Points available	Points achieved	% of points achieved	Score
Profile	1	1	100%	5.0 (Advanced)
Management systems	31	17	54.8%	2.8 (Moderate)
Freely chosen employment	6	6	100%	5.0 (Advanced)
Freedom of association	7	7	100%	5.0 (Advanced)
Health and safety	54	53	98.1%	4.9 (Advanced)
Working hours	6	4	66.7%	3.4 (Good)
Discrimination	41	23	56.1%	2.8 (Moderate)
Discipline and grievance	34	32	94.1%	4.7 (Advanced)
Communities and human rights	12	7	58.3%	2.9 (Moderate)
Business ethics	10	9	90%	4.5 (Advanced)

CRITERION 5.1

Baseline Data template

The ACAN baseline data table provides a comparative measure of supplier engagement and program activities to measure progress and inform future action planning.

2025 Graph – Baseline Data

	ACTIVITY	2023	2024	2025	Notes
INTERNAL / STAFF	Hours spent on modern slavery activities	120	120	150	Hours spent on modern slavery activities
	Individual staff completed e-learning	0	0	345	Individual staff completed e-learning
	E-learning modules completed	0	0	345	E-learning modules completed
EXTERNAL / SUPPLIER ENGAGEMENT	Total number of suppliers	3251	1965	2537	Number of suppliers
	Number of suppliers with visible contact information and ABN	**	1725	2398	Number of suppliers with visible contact information and ABN
	Number of suppliers across high-risk categories	1755	1590	1199	Number of suppliers across high-risk categories
	Number of ACAN Supplier Surveys completed	128	338	528	Number of ACAN Supplier Surveys completed (cumulative)
	Supplier staff attending capacity building webinars	11	38	19	Number of Supplier staff attending capacity building webinars
	Invited to join Sedex	45	44	62	Number of suppliers invited to join Sedex (cumulative)
	Joined Sedex	27	56	74	Number of suppliers that Joined Sedex (cumulative)
	Sedex SAQ completed	8	62	69	Number of Sites with Sedex SAQ completed (cumulative)
	Social audits	1	9	2	Number of social audits completed in 2025
	Corrective actions	0	43	16	Number of non-conformances in 2025
DOMUS 8.7 EXTERNAL REFERRALS	Contacts made via worker voice / grievance mechanism	0	0	0	Contacts made via worker voice / grievance mechanism
	Referrals for advice and assistance	0	0	0	Referrals for advice and assistance
	Individuals identified or referred for modern slavery assessment	0	0	0	Individuals identified or referred for modern slavery assessment
	Individuals with modern slavery cases remediated	0	0	0	Individuals with modern slavery cases remediated

CRITERION 5.2

Action Planning for 2026

In 2026, the CEDB will be continuing to:

1. Engage with capacity building with CEDB key employee and other stakeholders to review high risk suppliers with particular focus on cleaning, waste management, grounds and maintenance contractors;
2. Review contract clauses for procurement in high-risk categories;
3. Analyse corrective actions stemming from non-conformance actions by suppliers;
4. Monitor social audits;
5. Roll out modern slavery e-learning modules to workforce to enhance awareness, responsibilities and continuous improvement.





CRITERION 6

Consultation with Owned or Controlled Entities

The CEDB actively communicates and consults with Principals and other key school personnel to enhance awareness on Modern Slavery Risks and best practice.

PRIMARY SCHOOLS

St John's Catholic Primary School, Baradine
The Assumption Catholic Primary School, Bathurst
Cathedral Catholic Primary School, Bathurst
Holy Family Catholic Primary School, Bathurst
St Philomena's Catholic Primary School, Bathurst
St Joseph's Catholic Primary School, Blayney
St Edward's Catholic Primary School, Canowindra
Sacred Heart Catholic Primary School, Coolah
St Lawrence's Catholic Primary School, Coonabarabran
St Brigid's Catholic Primary School, Coonamble
St John's Catholic Primary School, Dubbo
St Laurence's Catholic Primary School, Dubbo
St Mary's Catholic Primary School, Dubbo
St Pius X Catholic Primary School, Dubbo
St Michael's Catholic Primary School, Dunedoo
St Joseph's Catholic Primary School, Eugowra
St Joseph's Catholic Primary School, Gilgandra
All Hallows Catholic Primary School, Gulgong
St Patrick's Catholic Primary School, Lithgow
St Joseph's Catholic Primary School, Manildra
St Joseph's Catholic Primary School, Molong
St Joseph's Catholic Primary School, Oberon
Catherine McAuley Catholic Primary School, Orange
St Mary's Catholic Primary School, Orange
St Joseph's Catholic Primary School, Portland
St Columba's Catholic Primary School, Yeoval

SECONDARY SCHOOLS

MacKillop College, Bathurst
St Johns College, Dubbo
La Salle Academy, Lithgow
James Sheahan Catholic High School, Orange

CENTRAL SCHOOLS

St Mary's Catholic School, Wellington

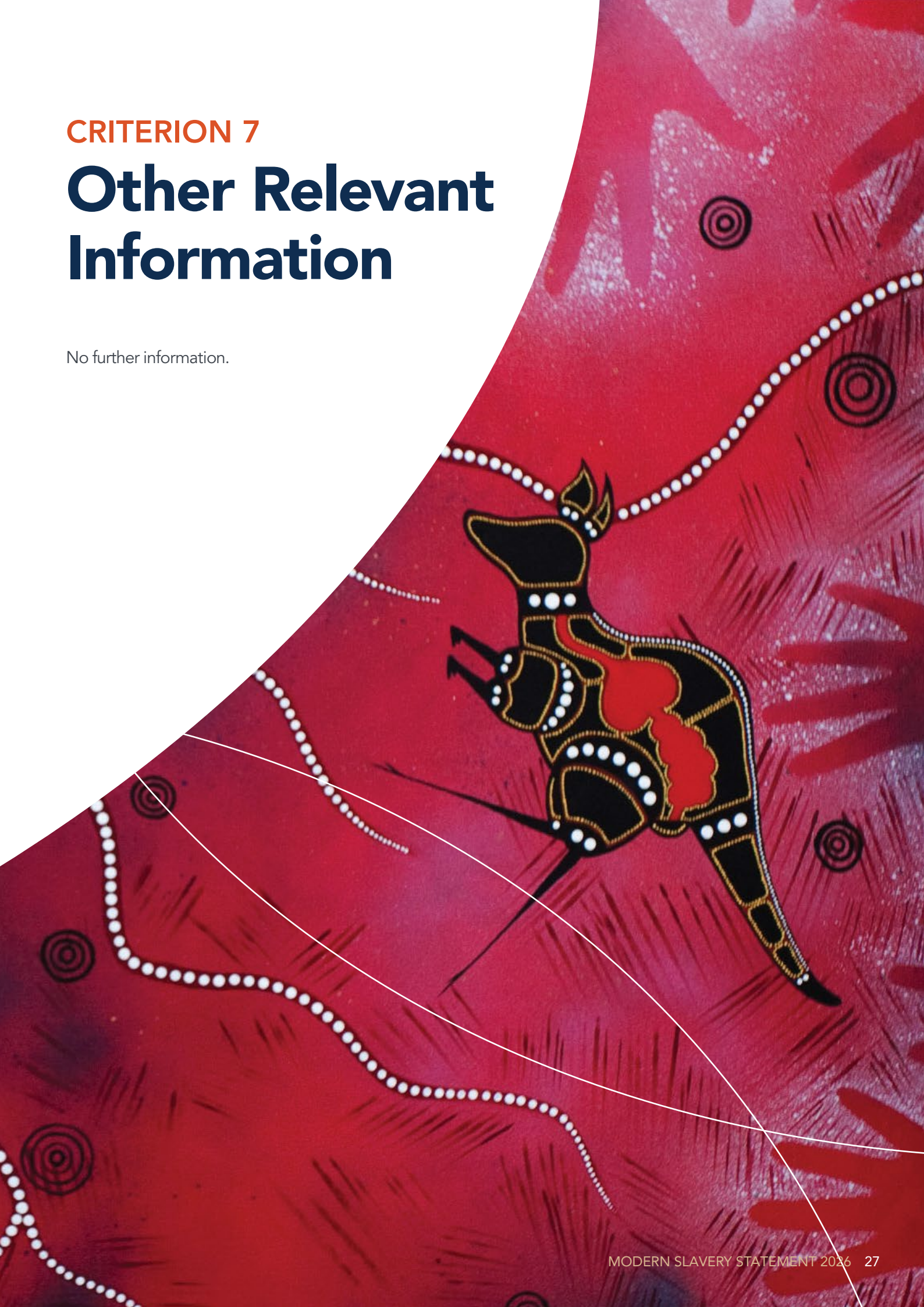
K-12 SCHOOLS

St Raphael's Catholic School, Cowra
St Matthews Catholic School, Mudgee

CRITERION 7

Other Relevant Information

No further information.





BATHURST

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Email cedb@bth.catholic.edu.au
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MODERN SLAVERY STATEMENT 2025

(1 January - 31 December 2025)



Catholic Education

Diocese of Wagga Wagga

DISCLOSURE NOTE

This Statement has been made on behalf of Catholic Education Diocese of Wagga Wagga which is the only agency in the Diocese of Wagga Wagga required to report on its supply chains under the Modern Slavery Act 2018 (Cth). This Statement covers all schools and entities controlled by Catholic Education Diocese of Wagga Wagga.

We acknowledge that Catholic schools and offices in the Diocese of Wagga Wagga are situated on the lands of the Wiradjuri, Yorta Yorta, Walgalu and Ngarigo people, who long before us lived, loved, raised their children and worshipped here. We pay respects to Elders past, present and emerging, and commit to the ongoing journey of reconciliation. We also acknowledge all Aboriginal and Torres Strait Islander families in our communities and acknowledge their physical and spiritual connections to their lands.

ABN: 36 345 537 994 Catholic Education Diocese of Wagga Wagga

Catholic Education Diocese of Wagga Wagga

ABN: 36 345 537 994

Address: McAlroy House, 205 Tarcutta Street, Wagga Wagga, NSW 2650

Website: <https://www.catholic.edu.au/>

Contact email for modern slavery: cedww-modernslavery@www.catholic.edu.au



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STATEMENT FROM THE BISHOP OF WAGGA WAGGA: MOST REV MARK S. EDWARDS OMI PHD DD

I am pleased to commend this third Modern Slavery Statement of Catholic Education Diocese of Wagga Wagga.

Modern slavery is abhorrent. It is a direct assault on the dignity of the human person. Each person is created in the image and likeness of God and must never be reduced to a commodity, a tool, or source of profit for another. We now know that it can be hidden in supply chains, contracts, labour arrangements and the everyday goods and services we use. It is a grave evil that demands our attention. This statement documents what Catholic Education Diocese of Wagga Wagga is doing about this.

I am grateful for the engagement and care of our staff and of the Modern Slavery Working Group as they continue this important work. The progress reflected in this Statement can be summarised under the headings of stronger policies, clearer contractual expectations, deeper supplier engagement, improved risk management, and continued formation and awareness. This shows a maturing commitment to ensuring that our school system does what it can not to be complicit in exploitation.

For us, this is not simply a matter of legal compliance, important though that is. It is an expression of our Catholic faith and our unwavering commitment to the dignity of every person, especially the most vulnerable. Our schools must not be built on injustice and indifference.

I thank all who have contributed to this work and encourage our continued vigilance and resolve.

Under God's grace, may our efforts help bring even a little more light into those places where human dignity is obscured and freedom denied.

St Josephine Bahkita, pray for us.

Yours in Jesus Christ and Mary Immaculate.

A handwritten signature in dark ink that reads "M Edwards OMI".

This Modern Slavery Statement was approved by the principal governing body of Catholic Education Diocese Wagga Wagga as defined by the Modern Slavery Act 2018 (Cth ("the Act")) on 4 May 2026. This modern slavery statement is signed by a responsible member of the Catholic Education Diocese of Wagga Wagga as defined by the Act.





STATEMENT FROM THE EXECUTIVE DIRECTOR OF CATHOLIC EDUCATION: DR SANDRA HARVEY

I am very pleased to present CEDWW's Modern Slavery Statement for 2025.

The past year was a significant one for our Church as we celebrated the 2025 Jubilee Year of Hope. This global celebration called us to be "Pilgrims of Hope," a theme that has naturally woven itself into our mission to combat modern slavery. If hope is the anchor of our soul, then our work to protect the vulnerable is how we pull that anchor into the reality of the present. We believe that every person is made in the image and likeness of God, and modern slavery is a direct violation of that inherent dignity.

In New South Wales alone, it is estimated that 16,000 people are living in conditions of exploitation. This isn't just a distant issue; it can hide in the supply chains of the very things we use in our classrooms and offices every day. While we have been working to update our contracts and working in partnership with the Australian Catholic Anti-Slavery Network (ACAN), our goal goes beyond administrative changes. We want an awareness of human dignity to become a natural part of our daily rhythm. By educating our staff and students, we are learning to see the human faces behind the products we use and the services we receive.

Pope Leo XIV has strongly denounced modern slavery as a "grave crime against humanity" and a "scourge" fueled by a culture that treats people as objects.

Integrating this understanding into our daily practice means making more conscious, ethical choices in our schools and offices. It is about moving from simply following a policy to truly witnessing the love and truth of Christ in how we treat every person in our supply chain.

Thank you for joining us on this journey. We remain committed to ensuring our schools are places of hope, where everyone can flourish in the fullness of their humanity.

Sincerely,



CRITERIA 1 - ABOUT US

The Catholic Diocese of Wagga Wagga is located within Wiradjuri, Yorta Yorta, Walgalu and Ngarigo country in the Riverina and southwestern district of New South Wales. The Murray and Murrumbidgee Rivers are significant geographical features of the area with the eastern border of the Diocese lying in the mountainous regions of the Great Dividing Range.

Established in 1917, the Diocese of Wagga Wagga has a rich faith tradition; our faith communities are nourished and sustained by the sacramental life of the church administered and accessed through 31 parishes. The Most Reverend Mark Edwards OMI is our Bishop.

We are guided in our work by our strategic direction which in 2025 will address the four strategic priority areas of:

- Evangelisation and Religious Education
- Education Services
- People and Culture
- Corporate Services

The theme for our system of schools for 2025 was the “Jubilee Year of Hope”, chosen by Pope Francis. Pope Francis articulated that hope is a universal experience, residing in the hearts of all individuals as a desire for good things to come, despite uncertainties about the future. Pope Francis also acknowledged the conflicting feelings that often accompany

hope, ranging from trust to apprehensiveness, and encourages believers to find reasons for hope through God’s word.

Vision

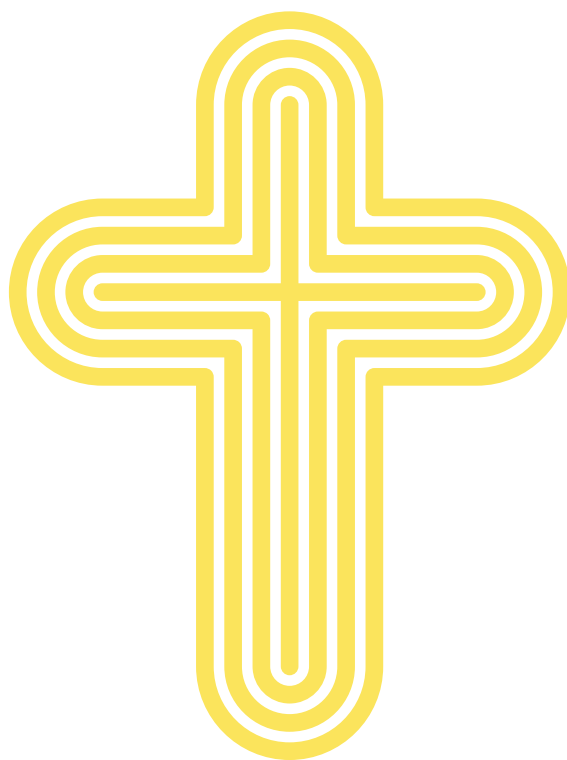
Inspired by the message and actions of Jesus Christ, we nurture excellence as a Community of Learners, so all may flourish in the fullness of their humanity.


**Catholic
Education**
Diocese of Wagga Wagga



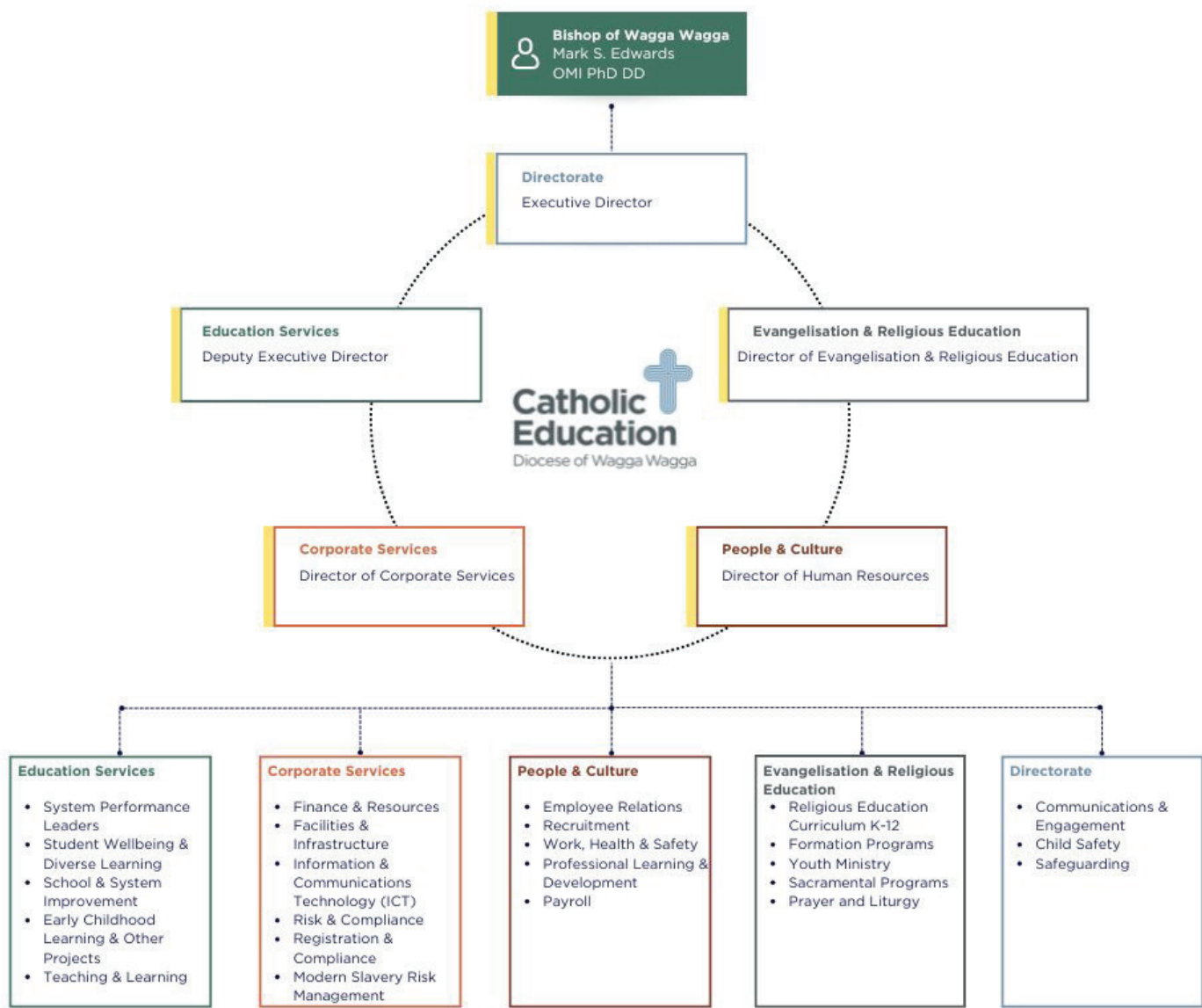
OUR VISION

Inspired by the message and actions of Jesus Christ we nurture excellence as a Community of Learners, so all may flourish in the fullness of their humanity.





CRITERIA 2 - OUR ORGANISATIONAL STRUCTURE, OPERATIONS AND SUPPLY CHAINS



GOVERNANCE

CEDWW is established by the Bishop of Wagga Wagga as the agency to deliver Catholic Education in the Diocese on his behalf. CEDWW works hand in hand with the other agencies of the Diocese in fulfilling the Church's mission. CEDWW, as an agency of The Trustees of the Roman Catholic Church for the Diocese of Wagga Wagga, is covered under the auspices of the Roman Catholic Church Property Trust Property Act 1936.

CEDWW's primary responsibility is to support and advance Catholic education while complying with legal requirements, with a focus on creating safe professional environments across all schools and workplaces, as well as a commitment to child safety.

In November 2020, the Catholic Education Council (CEC) of the Diocese of Wagga Wagga was established by the Bishop of Wagga Wagga as an advisory body to advise him on the education policy of Catholic schools within the Diocese of Wagga Wagga. In addition, four permanent committees were established to assist the CEC in this role:

- Catholic Identity and Mission Permanent Committee
- Education and Pastoral Wellbeing Permanent Committee
- People and Culture Permanent Committee
- Finance, Risk, Audit and Compliance Permanent Committee

Membership of the Permanent Committee comprises people external to CEDWW who have relevant qualifications and experience, with CEDWW Leadership Team members attending in an ex officio capacity.

The Executive Director of Catholic Education is supported by the CEDWW Directorate, working closely with schools to provide high-quality education in alignment with Catholic traditions.

The CEDWW Directorate Senior Management Team consists of:

- Executive Director of Catholic of Education
- Deputy Executive Director of Catholic Education
- Director of Human Resources
- Director of Corporate Services
- Director of Evangelisation and Religious Education

The Executive Director of Catholic Education is assisting in managing CEDWW's Modern Slavery Risk through:

- Appointment of a Modern Slavery Liaison Officer and Deputy Modern Slavery Liaison Officer to act as key contacts between CEDWW and ACAN.
- Formation and introduction of CEDWW Modern Slavery Working Group along with ACAN terms of reference to oversee CEDWW compliance with legislation and implementation of policy and procedures.
- Modern Slavery included as a permanent agenda item in the Finance, Risk, Audit and Compliance Permanent Committee quarterly meetings and quarterly reporting.

MODERN SLAVERY WORKING GROUP

CEDWW's Modern Slavery Working Group consists of participants with a diverse range of relevant experience and expertise.

CEDWW's Modern Slavery Working Group members for 2025 are:

- David Collins, Director of Corporate Services (Chair)
- Marika Burton, People & Culture Manager (Deputy Chair)
- Rachel Loveday, Administration Officer Corporate Services (Secretary)
- Nicole Carroll, Accountant
- Jessica De Jong, Senior School Infrastructure Officer

- Suzanne Brunckhorst, Risk & Compliance Officer
- Matt Humphrey, Communications & Engagement Officer
- Bruce Crawford, ICT Manager
- Angela Scott, Principal (St Joseph's Primary School, Junee)
- Shaun Ellis, Principal (Mater Dei Catholic College)

Bruce Crawford and Monique Swan (People & Culture Officer) were Acting Chair and Acting Deputy Chair, respectively, after David Collins and Marika Burton's departure from CEDWW in late 2025.

CEDWW's Modern Slavery Working Group meet, at a minimum, four times each year, per the Working Group's Terms of Reference. However, its Subcommittee (David Collins, Marika Burton, and Rachel Loveday) would meet regularly, having held 13 Subcommittee meetings in 2025.

OPERATIONS

Catholic Education, Diocese of Wagga Wagga (CEDWW) comprises 29 schools – 24 primary, 5 secondary and 2 boarding houses. Boarding facilities can be accessed by 3 of our secondary schools. In 2025, CEDWW employed 1,351 people and our schools educated 8,890 students. CEDWW also engaged contractors from 48 cleaning and maintenance businesses.

MAP OF THE DIOCESE OF WAGGA WAGGA



CEDWW ANNUAL CONSOLIDATED REVENUE:

CEDWW's annual consolidated revenue for the 2025 Reporting Period was \$219,892,248.

OUR SUPPLY CHAIN:

CEDWW engaged the services of some 2,332 third party suppliers during the reporting period. These ranged from multi-million dollar school construction projects to minor consumable purchases. The majority of CEDWW's significant suppliers are Australian based. CEDWW's preference is to negotiate larger contracts centrally however the geographic spread of our schools means that they have the autonomy to purchase some items directly and engage any suppliers they choose to meet their operational and location needs. These suppliers tend to be smaller service providers or retail operations.

In general terms, CEDWW's purchasing derives from two sources:

- Centralised Catholic Schools Office contracts and purchasing – These are usually multisite agreements or acquisitions for building service contracts, information and communication technology, or utility services across the system or high cost Building and Construction projects at specific sites. In 2023, CEDWW entered into a procurement contract with Woolworths Supermarkets that covers all of our schools (with the exception of two), as well as cleaning contracts where clusters of location permit. In 2024, CEDWW entered into procurement contracts with three pest control companies, and continued these contracts in 2025. Or;
- School contracts and purchasing – These are usually single site agreements or acquisitions for an individual school, such as for educational supplies and photocopying services.

CEDWW is actively seeking opportunities to enter into group purchasing arrangements in other areas such as mechanical services, pest and termite control. In addition to providing a commercial benefit, the consolidation of such services will assist in managing and minimising CEDWW's risk of exposure to modern slavery activities.

CRITERIA 3 - MODERN SLAVERY RISKS

CEDWW and ACAN

During 2022, CEDWW became a member of the Australian Catholic Anti-Slavery Network (ACAN) to assist CEDWW in complying with the requirements under the Modern Slavery Act (2018). As a further aid CEDWW commenced the ACAN Modern Slavery Risk Management Program at the time of joining. CEDWW continued its membership with ACAN in 2025.

ACAN has developed a suite of resources that CEDWW utilises as it embarks on the journey to minimise the risk of engaging in any activities that may include or facilitate modern slavery, in particular through our supply chain.

Risk Assessment

For CEDWW, modern slavery risks are defined by the ACAN Category Risk Taxonomy, a classification standard that identifies the severity of actual or potential harm to people (saliency) in spend categories.

The ACAN Category Risk Taxonomy is based on sources, such as:

- The Global Slavery Index
- The International Labor Organisation (ILO), including definitions of modern slavery
- The Bureau of International Labor Affairs (ILAB), U.S. Department of Labor
- The Global Child Forum and UNICEF.

Five key factors are also used to determine the level of risk:

- **Geography:** the country or location where a good is made or service is delivered.
- **Industry:** the sector in which the making of goods or delivery of service occurred.
- **Commodity:** the raw materials or components that comprise the goods or products.
- **Workforce vulnerability:** such as bonded visas, temporary migrants, women or children known to be employed in specific industry sectors.
- **Domus 8.7:** trends, cases, and risk intelligence identified through the Domus 8.7 remediation service, including grievances and remediation insights relevant to category and risk to workers.

Classification

HIGH RISK	MEDIUM RISK	LOW RISK
• Building and Construction • Cleaning and Security • Events and Events Management • Facility Management and Property Maintenance • Finance and Investment • Food and Catering Services • Furniture and Office Supplies • ICT Hardware • ICT Software and Network Services - Offshore • Labour Hire • Linen, Laundry, and Textile Products • Medical Devices and Supplies • Transport, Logistics and Warehousing • Uniforms and PPE • Waste Management Services	• Advertising & Marketing • ICT Software and Network Services - Onshore • Utilities • Fleet Management, Consumables, and Maintenance • Travel and Accommodation • Print/Mail Providers	• Professional Services • Financial Expenses • Government and Agency Fees • Licence/Membership Fees

Note: The following categories are not in Scope of the ACAN Category Risk Taxonomy

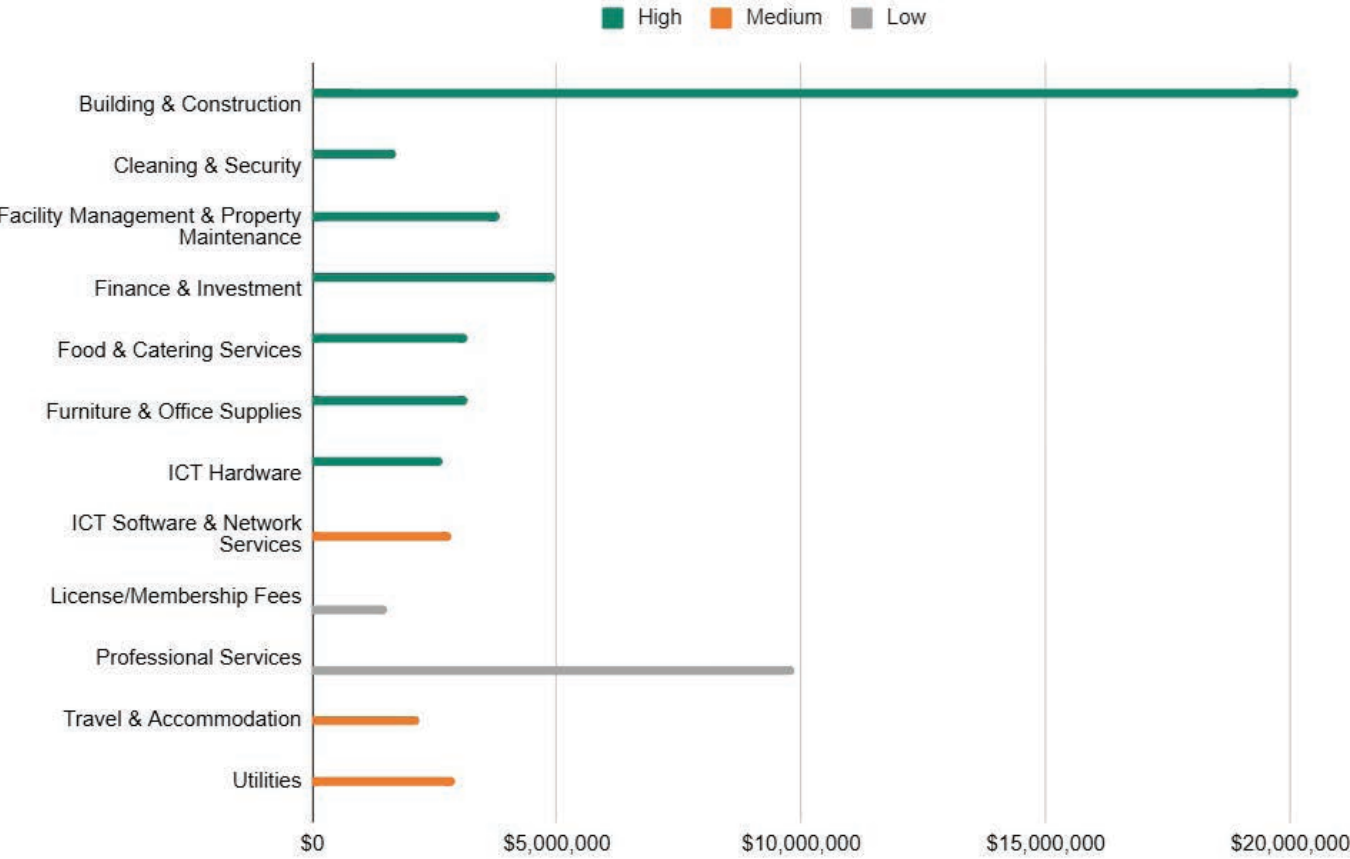
- Pastoral
- Payroll (excluding labour hire and sub-contracting)

The ACAN Category Risk Taxonomy has been applied to CEDWW's supplier files in its financial management system, Tech One.



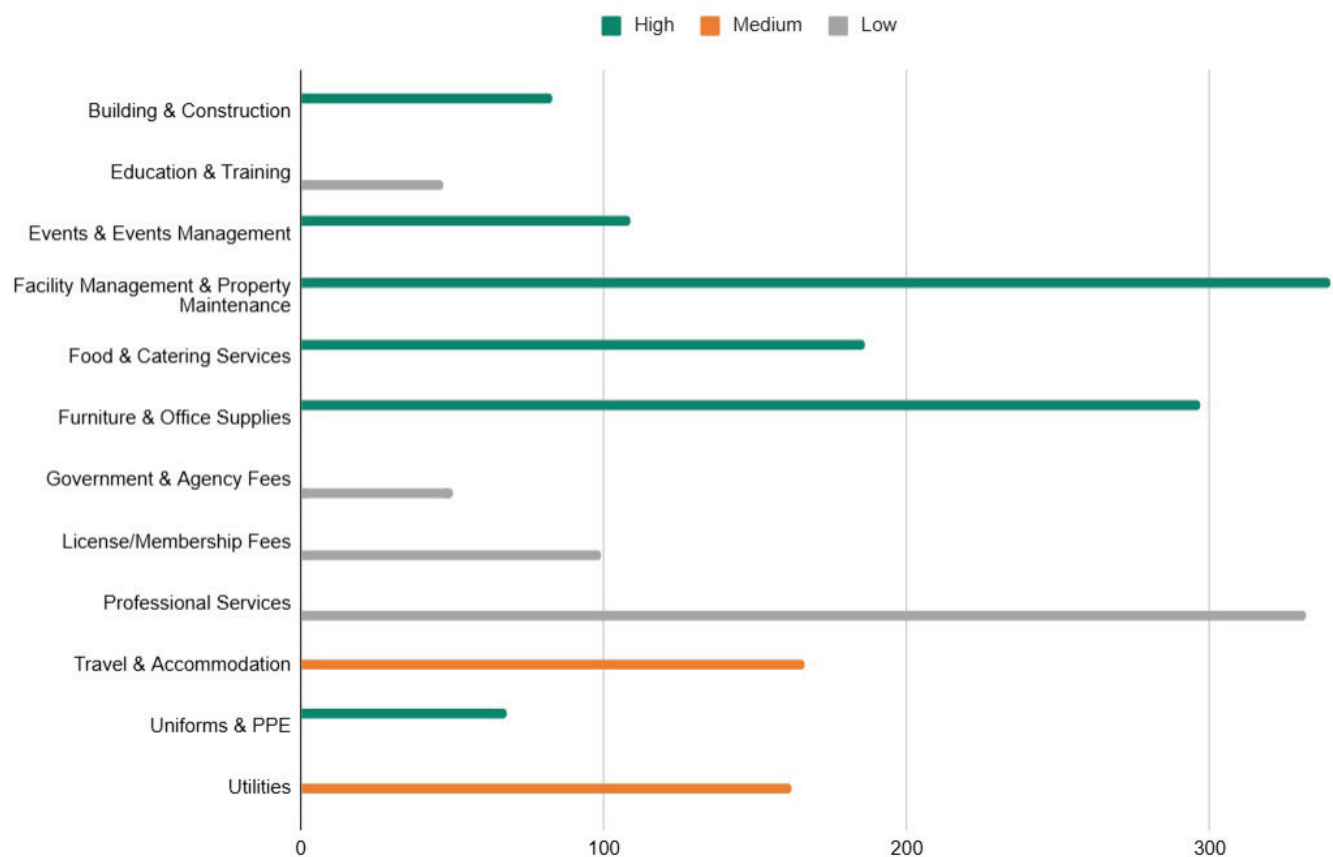
The following charts below highlight that 7 out of our 12 highest expenditure areas are in high-risk industries. Suppliers within these high-risk industries, which are amongst our 12 largest providers, will be our focus during 2026 and beyond.

TOP 12 CATEGORIES OF CEDWW EXPENDITURE



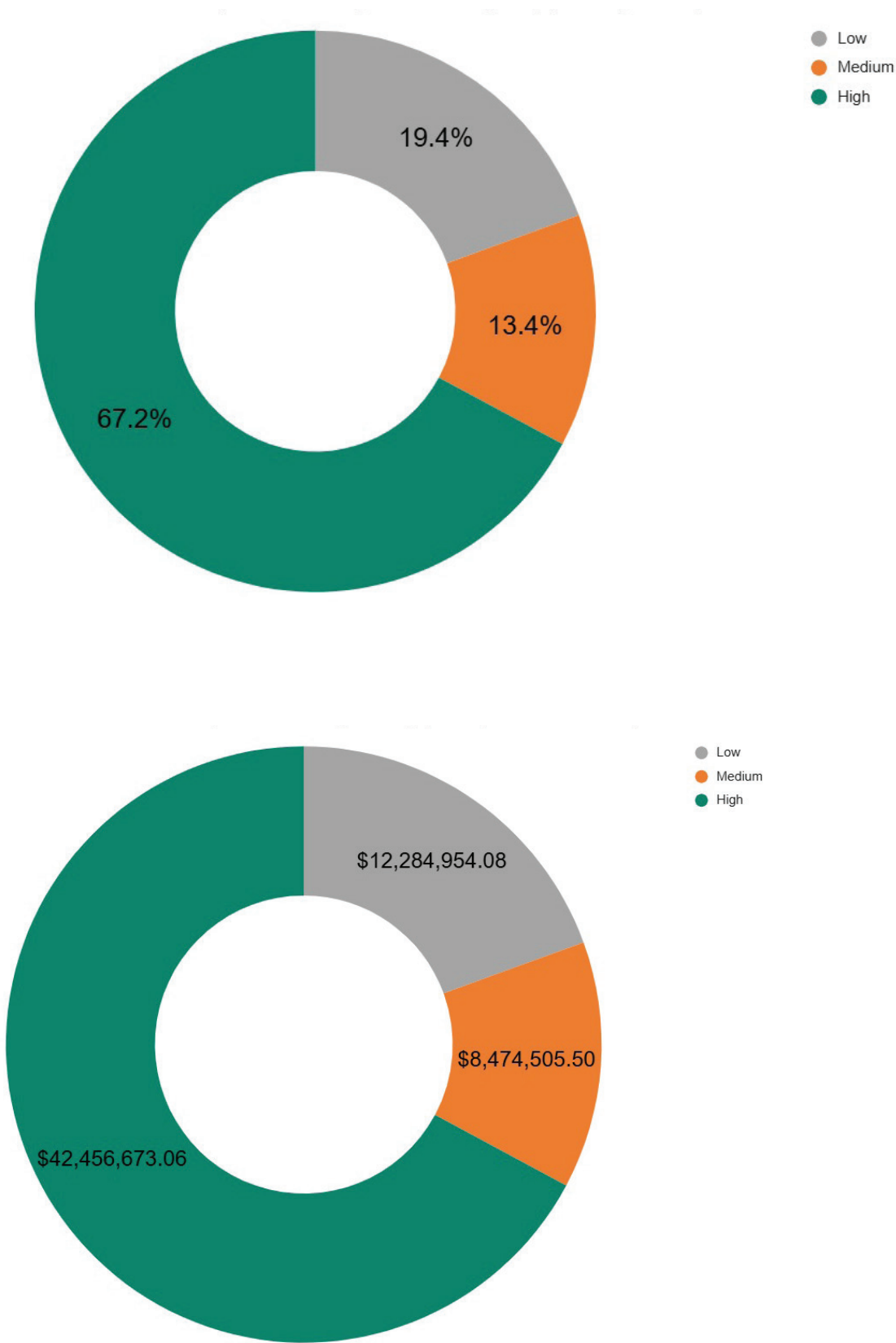


TOP 12 CEDWW EXPENDITURE BY SUPPLIER NUMBER



CEDWW's spend (by risk categories):

In 2025, CEDWW's non-employee related expenditure totalled \$63,216,133. A risk assessment of our 2025 expenditure has identified that over 60% was for goods and services in areas classified as high risk, as represented in the charts below:



CRITERIA 4 - ACTIONS TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

ACAN Supplier Engagement

The ACAN Program provides supplier engagement support and data, enabling a systematic and comprehensive supply chain risk assessment. In 2025, the ACAN Modern Slavery Risk Management Program launched a new purpose-built data management platform - ROTA.

ROTA centralises the ACAN Risk Management Program Framework and facilitates supplier performance evaluation and management in the following ways:

1. Evaluation of the modern slavery risk within operations and supply chains, using the ACAN Risk Taxonomy.
2. ACAN Supplier Survey to identify supplier revenue, number of employees, countries of origin for goods sourced overseas, workforce contractual arrangements, and SEDEX membership status.
3. Supplier education on modern slavery and risk management in key areas: cleaning, building and construction, procurement of labour, labour hire and services, sourcing goods from overseas, grievance mechanisms, and remediation.
4. Onboarding suppliers to SEDEX requires a business address, contact details, and goods or services provided.
5. SEDEX Self-Assessment Questionnaire (SAQ) helps suppliers to evaluate their practices against established standards and identify areas for improvement.
6. Desktop review to identify key actions required from suppliers.
7. Enhance supplier screening using Know Your Client (KYC) intelligence software.
8. Corporate Social Compliance Audits provide a point in time, objective, and independent verification process of supplier alignment with local laws and worker wellbeing standards.
9. Domus 8.7 index modern slavery statement assessment on selected suppliers in high-risk categories.
10. ACAN Prequalified Supplier Directory - a list of preferred suppliers accessible to Catholic organisations.



Actions taken to mitigate risk

During the reporting period, the following initiatives have been initiated or actioned:

Policy and Procedure:

- The continued appointment of a Modern Slavery Liaison Officer and Deputy Modern Slavery Liaison Officer to act as key contacts between CEDWW and ACAN.
- CEDWW's Modern Slavery Policy was published on CEDWW's internal and public websites, outlining CEDWW's expectations on all staff, contractors, and suppliers, with regards to modern slavery practices and compliance with the Modern Slavery Act.
- CEDWW's Modern Slavery Working Group held four meetings, and its sub-committee (CEDWW's Modern Slavery Working Group Chair, Deputy Chair, and Secretary) held an additional thirteen meetings throughout 2025 to continue overseeing CEDWW compliance with legislation and implementation of policy and procedures.
- The continued review and updating of standard CEDWW supplier and services agreements to include anti-slavery provisions.
- The continued review and updating of CEDWW standard construction contracts to ensure compliance with the Modern Slavery Act.
- The continued inclusion of modern slavery clauses in contracts and tenders. This was also extended in 2025, with the inclusion of modern slavery expectations and obligations in Expression of Interest documentation for prospective school uniform suppliers for one of CEDWW's secondary schools.
- The continuance of Modern Slavery as a permanent agenda item in Finance, Risk, Audit and Compliance (FRAC) Permanent Committee quarterly meetings, and quarterly reporting.
- CEDWW finalised its risk management framework to assist CEDWW in managing its modern slavery risks.

Awareness Raising:

- CEDWW's Modern Slavery Statement 2024 was launched at the CEDWW Head Office during Monday morning prayer on 10 June 2025. The launch included raising awareness of St. Josephine Bakhita, praying for her and the victims of modern slavery and human trafficking, and raising awareness of modern slavery and its effects both internationally and in Australia.
- CEDWW's Modern Slavery Statement 2024 was published online, on both CEDWW's internal and public websites, with printed copies distributed to all 29 schools and two boarding houses.
- CEDWW updated its Modern Slavery web pages for both its internal and public websites.
- Completion of ACAN Modern Slavery Entity Profile and SEDEX Self Assessment Questionnaire (SAQ), to assist with identifying areas that require focus or additional attention.

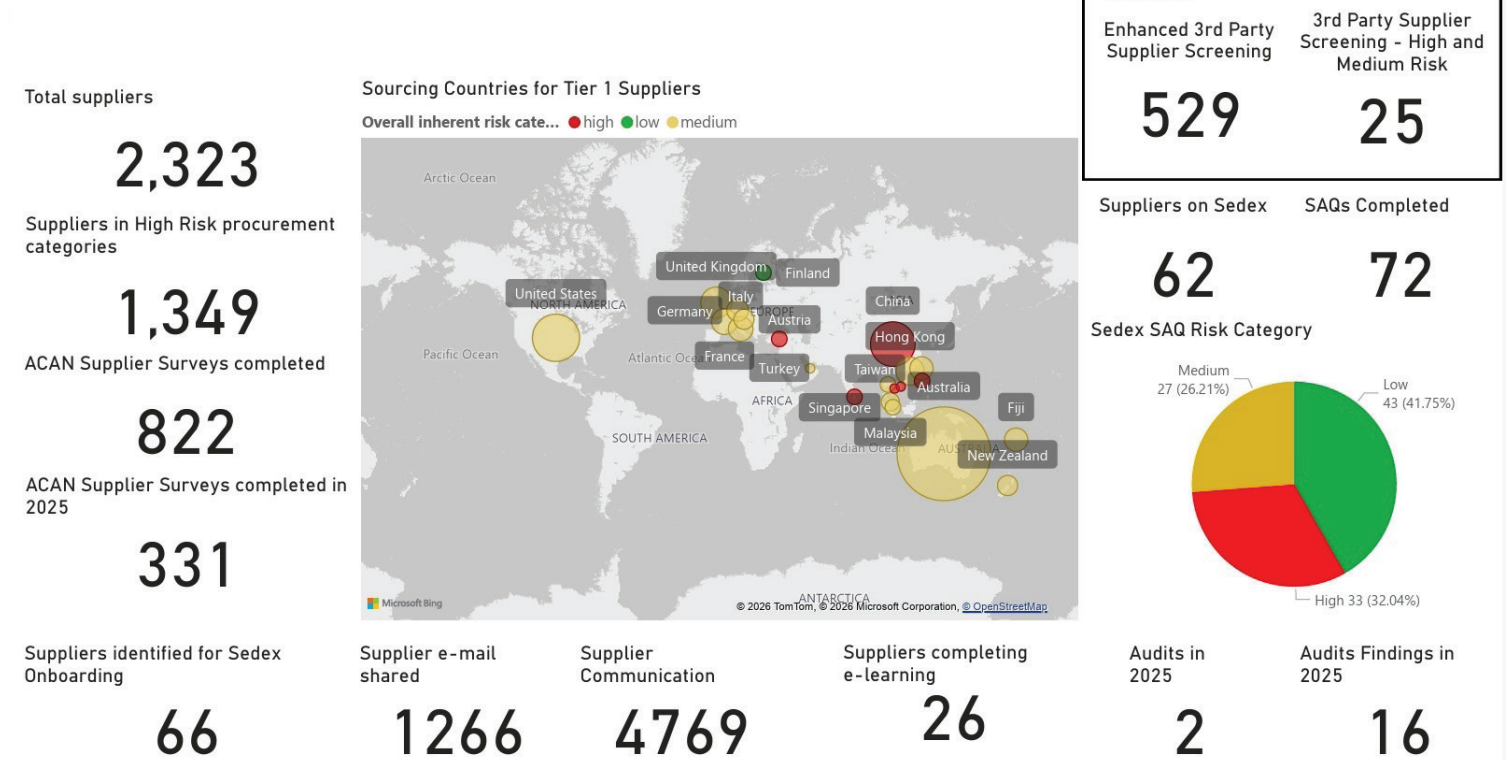
Supplier Engagement:

- CEDWW's continued membership with SEDEX for supplier assessment and supply chain visibility.
- CEDWW provided details of its high-risk suppliers to ACAN. ACAN engaged with the high-risk suppliers on CEDWW's behalf. 822 suppliers have completed the ACAN Supplier Survey to date, with 331 of those completing the Survey in 2025. Currently, 26 of CEDWW's suppliers have completed ACAN modern slavery awareness e-learning.
- CEDWW's ICT team distributed a modern slavery brief at the beginning of its annual technological bulk purchase process to their suppliers for the second time (the first time being 2024), outlining CEDWW's expectations of them to comply with the Modern Slavery Act. This brief included the Modern Slavery Supplier Fact Sheet that was created in 2024.
- CEDWW continued using its established modern slavery risk classification tool within its

financial management system to apply a modern slavery risk classification to all its suppliers. The tool enables CEDWW to meet their obligations under the Modern Slavery Act, and allows for efficient risk management and financial reporting to ACAN.

- CEDWW continued to undertake procurement risk analysis across key areas of CEDWW.

Supplier Engagement Overview



CEDWW Supplier Engagement Update as of April 2026 provided by ACAN, these statistics are for the 2025 Reporting Period.

Domus 8.7

CEDWW is a founding member of Domus 8.7. Domus 8.7 was established as an agency of the Catholic Archdiocese of Sydney in 2020 as a key element of the ACAN Modern Slavery Risk Management Program. This collaborative approach to remediation is aligned with the Modern Slavery Act and Catholic Social Teaching which are centred on the needs, wellbeing and empowerment of the people impacted.

Domus 8.7 provides CEDWW:

- Resources that enable us to listen to workers (grievance channel)
- A 24/7 careline for workers on our sites, staffed by professional counsellors
- Direct support to people impacted by modern slavery.
- Guidance and technical assistance to prevent, identify and remediate modern slavery.
- A documented process to assess if an organisation has caused, contributed or is directly linked to modern slavery and modern slavery indicators.

Domus 8.7 empowers people impacted by modern slavery to have choice and control over what forms of remediation are meaningful to them and to engage safely with business/supply chain actors. Support may include:

- Modern slavery indicator assessment
- Needs assessment, care coordination, response and remediation planning
- Referrals to community, social services, unions
- Transport, accommodation, financial and food support
- Legal support, referrals, accompaniment and advocacy
- Job training, retraining and redeployment
- Accompaniment and advocacy to engage with government and law enforcement agencies.
- Opportunities to contribute lived expertise to improve modern slavery responses

The Domus 8.7 Advisory Committee Members also include a person with lived expertise, Mr Moe Turaga. Domus 8.7 is a registered charity with the Australian Charities and Not-for-profits Commission (ACNC) and is an endorsed Public Benevolent Institution with Deductible Gift Recipient (DGR) status.

Other CEDWW Remediation Processes

CEDWW is committed to ensuring it provides appropriate and timely remedy to people impacted by modern slavery in accordance with the United Nations Guiding Principles on Business and Human Rights, Modern Slavery Act 2018 (Cth) – Guidance for Reporting Entities and relevant Australian laws. This includes providing for, or cooperating in, actions to address harm to people and root causes to mitigate future risks if CEDWW is found to have caused or contributed to modern slavery.

Where CEDWW is found to be directly linked to modern slavery by a business relationship, it is committed to working with the entity that caused the harm to ensure remediation and mitigation of its recurrence. Remediation obligations and expectations are to be included in contracts with high risk suppliers who must notify and consult with CEDWW to support victim centred remediation processes are implemented to the satisfaction of CEDWW.

Looking ahead to 2026

Having embarked on this journey, CEDWW is committed to providing an appropriate and timely remedy to people impacted by modern slavery. Our continued engagement with ACAN is a key resource for assisting us in meeting our legal and moral obligations.

This may involve providing for, or cooperating in, actions to address people's harm. It may also include addressing the root causes to mitigate future risks, if they are found to have caused or contributed to modern slavery.

Where CEDWW is found to be directly linked to modern slavery through a business relationship, it is committed to working with the entity that caused the harm to ensure remediation and mitigation occurs. Should the appropriate response by the third party not be appropriate, CEDWW will cease all dealings immediately. Remediation obligations are now included in contracts with high risk suppliers, which require notification and consultation with CEDWW to ensure victim-centred remediation processes are introduced.

When allegations of modern slavery come to our attention through whistleblowers or other channels, CEDWW will contact relevant law enforcement agencies, if a person is in immediate danger or Domus 8.7 to begin the remediation process.





CRITERIA 5 - ASSESSING EFFECTIVENESS

Continuous Improvement:

Collaboration is at the heart of accelerating progress. This also includes opportunities to comparatively measure social, environmental, and governance (business ethics) risks and actions with peers in our network.

In its foundational stages, CEDWW used an internally devised ACAN framework to measure progress. This bespoke approach reflected the unique priorities, constraints, and practices across Catholic organisations.

In 2025, the ACAN Program adopted a globally recognised risk measurement system through SEDEX. This aligns reporting entities with a methodology that combines global data about risks in different countries and industries with site-specific information from the SEDEX platform. SEDEX regularly updates the methodology to ensure it is aligned with new and emerging risks.

Therefore, completion of the SEDEX SAQ by CEDWW is a substantial measure of continuous improvement year on year. Below is an explanation of how scoring is calculated using the SEDEX SAQ and CEDWW's risk and management controls scores that will serve as our benchmark for continuous improvement.

Explanation of scoring:

Combined Risk Score - calculated from inherent risk and site characteristics, adjusted for management controls and audit results. The score is broken down by pillar (see below) and highlights strengths and opportunities to focus our efforts on key areas that drive ethical and sustainable practices.

Inherent Risk Score - predicts potential risks based on a country/region, and sector. Spanning all four pillars, this score is broken down by topics. It can be used as a baseline to identify and prioritise areas for improvement in operations. This score shows the natural risks of doing business in a specific country or sector. It does not include any details about individual sites.

The four pillars that risk scores are broken down by are:

Labour Standards Pillar - assesses location and industry factors that could increase labour risks, such as vulnerable worker populations or high rates of workplace violations.

Health and Safety Pillar - considers regional and industry-specific health and safety risks, including local regulations and industry accident rates.

Business Ethics Pillar - assesses industry and location risks related to unethical practices, such as high corruption levels or weak regulatory oversight.

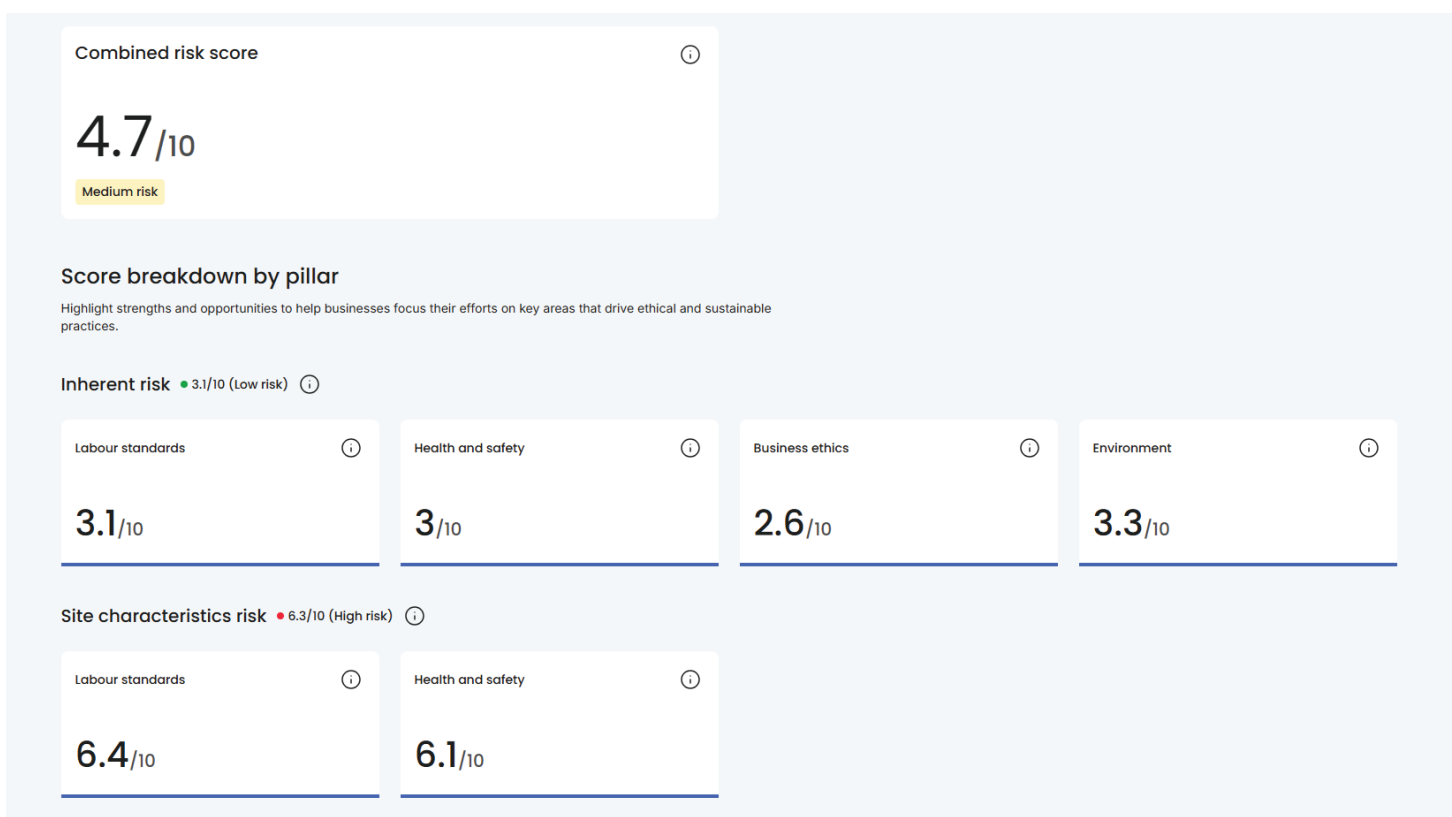
Environment Pillar - examines the environmental impact of the site's industry and location, such as pollution levels or resource use that may create regulatory or compliance risks.

Site Characteristics Risk Score - highlights potential risks based on CEDWW's suppliers' SAQ responses in the Labour Standards, and Health and Safety Pillars. This score can be used to assess and support the implementation of policies and processes that mitigate workplace risks within CEDWW's supply chain. For the Environment SAQ, site characteristics consider the type of work, business and location (e.g. proximity to sensitive areas). For the Core SAQs, risks are assessed based on the nature of the work, such as exposure to heavy machinery or hazardous materials.

Labour Standards (for this Risk Score) - reflects labour-related risks like employment practices, workers rights and wages based at SAQs responses. High-risk activities in this area can raise the score.

Health and Safety (for this Risk Score) - based on SAQ responses to questions about site-specific health and safety factors, such as equipment usage, handling or chemicals, or accident risks.

CEDWW's Risk Score for 2025



Management Controls Score - This score measures how well policies or processes are in place to reduce the risks from the site characteristics. It is also based on answers in the SAQ. A Poor score of 0-0.9 indicates that there are few or no controls in place. An Advanced score of 4-5 indicates that there are exemplary controls that exceed compliance and drive innovation.

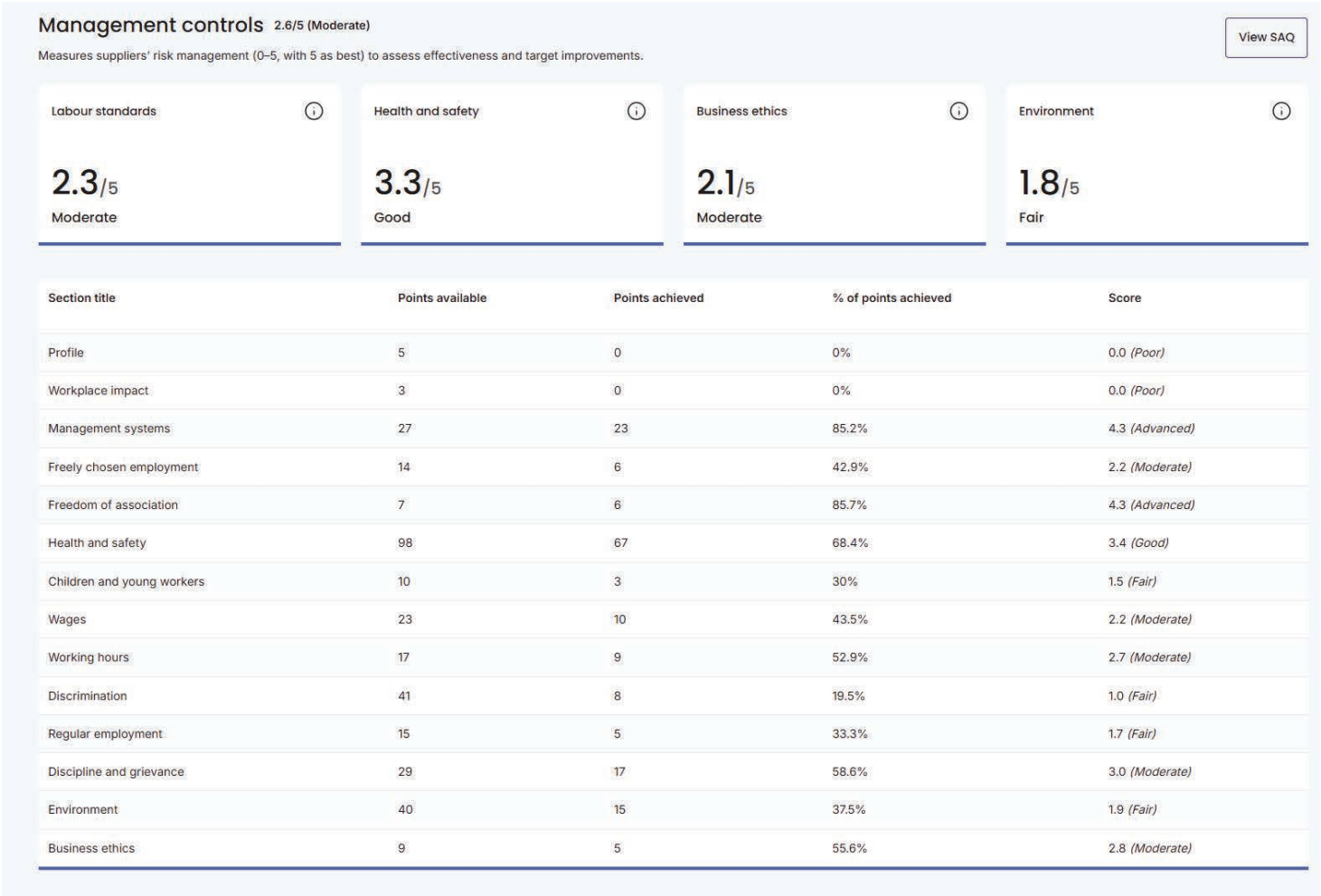
Labour Standards - evaluates policies and processes to ensure fair labour standards and worker protections are effectively managed.

Health and Safety - reviews the adequacy of safety protocols, emergency preparedness and training efforts to manage health and safety risks on site.

Business Ethics - evaluates controls against unethical practices such as anti-bribery policies, compliance with legal standards, and transparent operations.

Environment - looks at policies managing environmental impact, resource efficiency and waste reduction practices to align with sustainability standards.

CEDWW’s Management Controls Score for 2025



CEDWW's 2025 Baseline Data:

The following table provides a summary of CEDWW's 2025 Baseline Data illustrating our efforts to mitigate our modern slavery risk, as well as the progress CEDWW has made since 2024, especially in regards to external/supplier engagement.

	ACTIVITY	2024 Catholic Education Diocese of Wagga Wagga	2025 Catholic Education Diocese of Wagga Wagga
INTERNAL STAFF	Hours spent on modern slavery activities	500	600
	Individual staff completed e-learning	0	1
	E-learning modules completed	0	1
EXTERNAL / SUPPLIER ENGAGEMENT	Total number of suppliers	2579	2323
	Number of suppliers with visible contact information and ABN	1109	1266
	Number of suppliers across high-risk categories	1008	1349
	Number of ACAN Supplier Surveys completed (cumulative)	319	822
	Supplier staff attending capacity building webinars (cumulative)	22	26
	Invited to join Sedex (Number of suppliers invited to join Sedex (cumulative)	24	66
	Joined Sedex (Number of suppliers that Joined Sedex (cumulative)	63	62
	Sedex SAQ completed (Number of Sites with Sedex SAQ completed (cumulative)	65	72
	Social audits (number of audits completed in 2024)	9	2
	Corrective actions (Number of non-conformances in 2024)	43	16
DOMUS 8.7 EXTERNAL REFERRALS	Contacts made via worker voice / grievance mechanism	7	2
	Referrals for advice and assistance	0	2
	Individuals identified or referred for modern slavery assessment	0	0
	Individuals with modern slavery cases remediated	0	0

Improving on what we do and our action plan for 2026:

- We will develop and deliver a training program for our staff to increase their understanding and awareness of modern slavery risks within our operations and supply chain.
- Educate and support high risk suppliers to understand their obligations under the Modern Slavery Act and our expectations.
- Embed due diligence processes when engaging with new and existing suppliers.
- Expand our incident management processes to include the ability to capture human rights and modern slavery breaches.
- Utilise SEDEX to identify key suppliers and risks across CEDWW.
- Engage with our high risk suppliers to assess their modern slavery practises.
- Develop and disseminate our supplier Code of Conduct and enhance direct engagement with high risk suppliers.
- Continue to bring awareness to modern slavery.

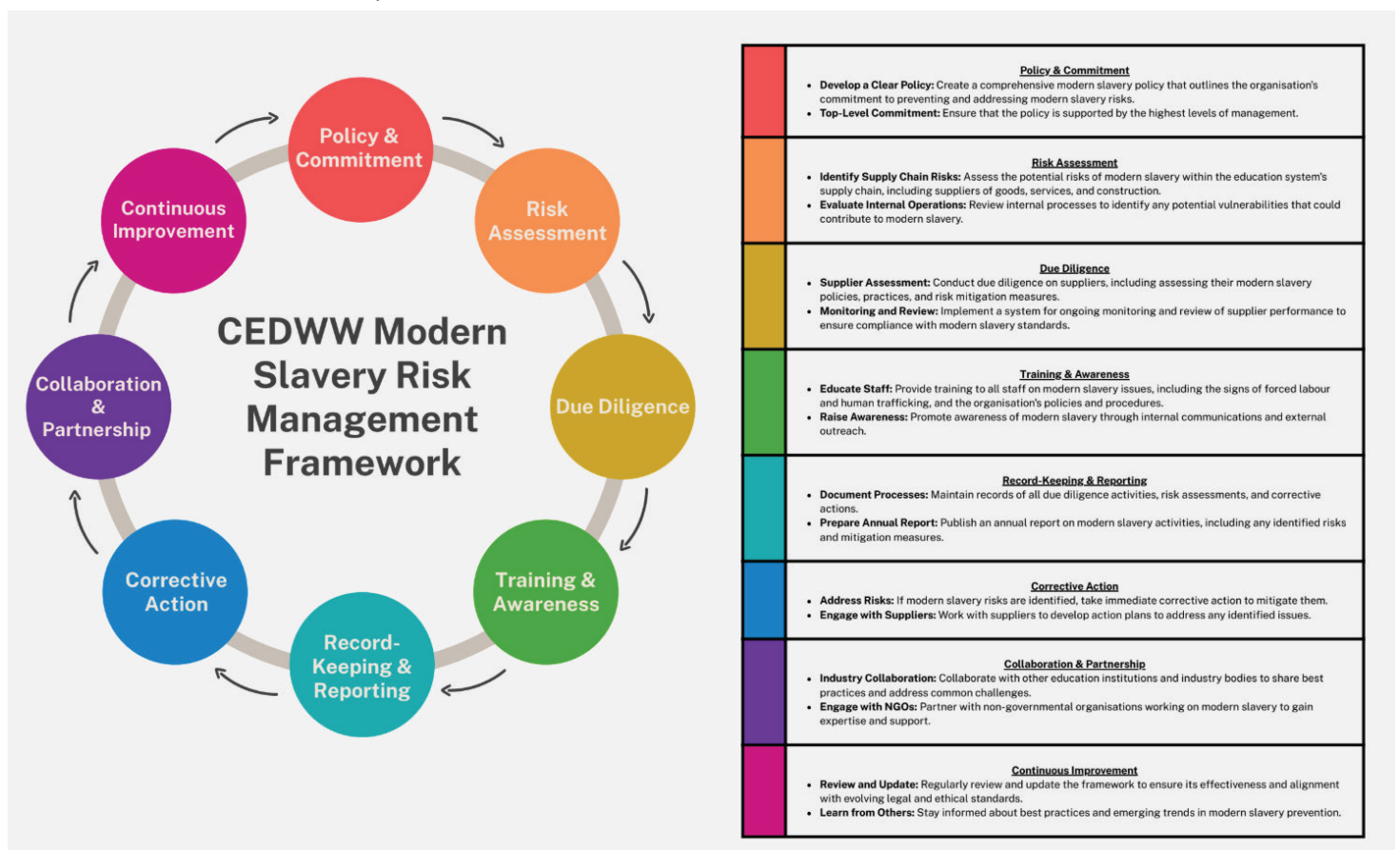
CRITERIA 6 - CONSULTATION WITH OWNED OR CONTROLLED ENTITIES

This criterion does not apply to us as CEDWW do not own or control any other entities.

CRITERIA 7 - ANY OTHER RELEVANT INFORMATION

In 2025, CEDWW finalised the visual version of their Modern Slavery Risk Management Framework, to outline its commitment to continuously identify, assess, mitigate and report on modern slavery risks.

The visual version of CEDWW's Modern Slavery Risk Management Framework can be found below. CEDWW's Modern Slavery Working Group also plan on publishing an online version of the Framework on CEDWW's internal and public websites.



APPENDIX:

Catholic Education Diocese of Wagga Wagga comprises of the following 29 schools:



PRIMARY

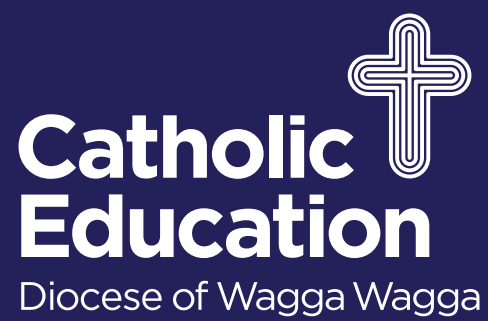
- All Saints' Primary School, Tumbumba
- Henschke Primary School, Wagga Wagga
- Holy Spirit Primary School, Lavington
- Holy Trinity Primary School, Wagga Wagga
- Mater Dei Primary School, Wagga Wagga
- Sacred Heart Primary School, Koorinal
- Sacred Heart Primary School, Tocumwal
- St Anne's Primary School, North Albury
- St Brendan's Primary School, Ganmain
- St Joseph's Primary School, Culcairn
- St Joseph's Primary School, Finley
- St Joseph's Primary School, Jerilderie
- St Joseph's Primary School, Junee
- St Joseph's Primary School, Leeton
- St Joseph's Primary School, Lockhart
- St Joseph's Primary School, Narrandera
- St Joseph's Primary School, Wagga Wagga
- St Mary's Primary School, Corowa
- St Mary's Primary School, Yoogali
- St Michael's Primary School, Coolamon
- St Patrick's Parish School, Albury
- St Patrick's Primary School, Griffith
- St Patrick's Primary School, Holbrook
- St Peter's Primary School, Coleambally

SECONDARY:

- Kildare Catholic College, Wagga Wagga
- Marian Catholic College, Griffith
- Mater Dei Catholic College, Wagga Wagga
- St Francis De Sales Regional College, Leeton
- Xavier Catholic College, North Albury

BOARDING HOUSES:

- Mount Erin Boarding, Wagga Wagga
- St Francis De Sales Regional College Boarding House, Leeton



Modern Slavery Statement 2025



CATHOLIC EDUCATION
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This Modern Slavery Statement was approved by the principal governing body of Catholic Education Diocese of Wollongong (CEDoW) as defined by the *Modern Slavery Act 2018* (Cth) (the Act).

CEDoW is a pastoral work of the Trustees of the Roman Catholic Church for the Diocese of Wollongong and is registered as a charity with the Australian Charities and Not-for-profits Commission.

This Modern Slavery Statement is signed by a responsible member of CEDoW as defined by the Act.



Most Rev. Brian Mascord DD
Bishop of the Diocese of Wollongong
10 June 2026

Disclosure Note

This Statement has been made on behalf of CEDoW and covers all entities owned or controlled by CEDoW for the reporting period 1 January 2025 to 31 December 2025.

CEDoW acknowledges the traditional custodians of the lands upon which our Catholic schools are built; the indigenous people of the Dharawal, Gundungurra and Yuin nations. To this day, our Catholic systemic schools are greatly influenced by the life and culture of Aboriginal communities, and we pay our respect to elders' past, present and emerging.

ABN: 67 786 923 62 Catholic Education Diocese of Wollongong
Level 5, 280 Keira Street, Wollongong NSW 2500
Website: www.dow.catholic.edu.au Email: info@dow.catholic.edu.au



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About Us

The Diocese of Wollongong is one of eleven Catholic Dioceses in the state of New South Wales. The seat of the Diocese is situated in the regional city of Wollongong, approximately 100 km south of Sydney, NSW.

CEDoW was established in 1952 and serves Catholic systemic school communities across four regions: the Illawarra; Macarthur; Southern Highlands; and Shoalhaven. Many parishes and schools have much longer histories, with some dating back to the early days of European settlement.

CEDoW exists to exercise the evangelising mission of the Church in education by leading and managing the system of Catholic schools on behalf of the Bishop of Wollongong in close collaboration with parents and carers, parish Priests and Principals. The system of Catholic schools has been established by the Bishop of Wollongong to serve the common good of the people of the Diocese through the effective coordination of resources, expertise and good will.

Mission

As a system of Catholic schools, we are clear on our mission and mandate. We exist to create vibrant Catholic school communities where every student finds meaning and purpose in their life through experiencing continual growth in faith and improvement in learning. In the past, we have put significant effort into planning where and how our efforts would be focused, typically over a three-to-five-year period, to advance this mission. These strategic plans generally included a significant number of diverse projects and activities.

Sometimes these initiatives were delivered as planned and sometimes, in response to unexpected changes, schools and the Catholic Education Office (CEO) adjusted course to meet the evolving needs of students, staff and

school communities. The value of our previous strategic plans was in their ability to describe where our system was headed, so that everyone understood our shared direction and how they could contribute to delivering the mission.



Brief Statement from our Executive Director of Schools



At Catholic Education Diocese of Wollongong, we recognise that our procurement processes have a significant impact on the lives of countless individuals and communities across the globe. We are committed to working with the Australian Catholic Anti-Slavery Network (ACAN) to eliminate modern slavery practices within our supply chains.

Catholic Social Teaching motivates us to lead with courage and set an example for the many students we serve. We have partnered with the ACAN to identify high-risk areas and educate our key suppliers on the issue of modern slavery and our collective responsibilities in this area. This partnership allows us to utilise ACAN's resources to continually improve our systems and supplier engagement strategies.

As the Executive Director of Schools for Catholic Education Diocese of Wollongong, I fully endorse our Modern Slavery Statement and the ongoing efforts we are making to confront and eliminate modern slavery practices. Our commitment to this cause is a long-term one that will require a substantial investment of time and resources. We understand that modern slavery is not a remote or isolated issue, and our choices as consumers have a significant impact on the lives of people worldwide.

We strongly believe that education and awareness are critical tools in the fight against modern slavery, and we are committed to working with our partners and stakeholders to promote ethical and sustainable practices throughout our supply chains. By raising awareness of this issue and educating our employees and suppliers, we can work together to eliminate modern slavery practices and create a world where human rights are respected and upheld.

As a community of Catholic schools, we have a unique opportunity to lead by example and set a precedent for ethical procurement processes that prioritise human dignity and respect. It is our responsibility to ensure our procurement practices are transparent, responsible, and ethical, and that we are doing our part to eradicate modern slavery.



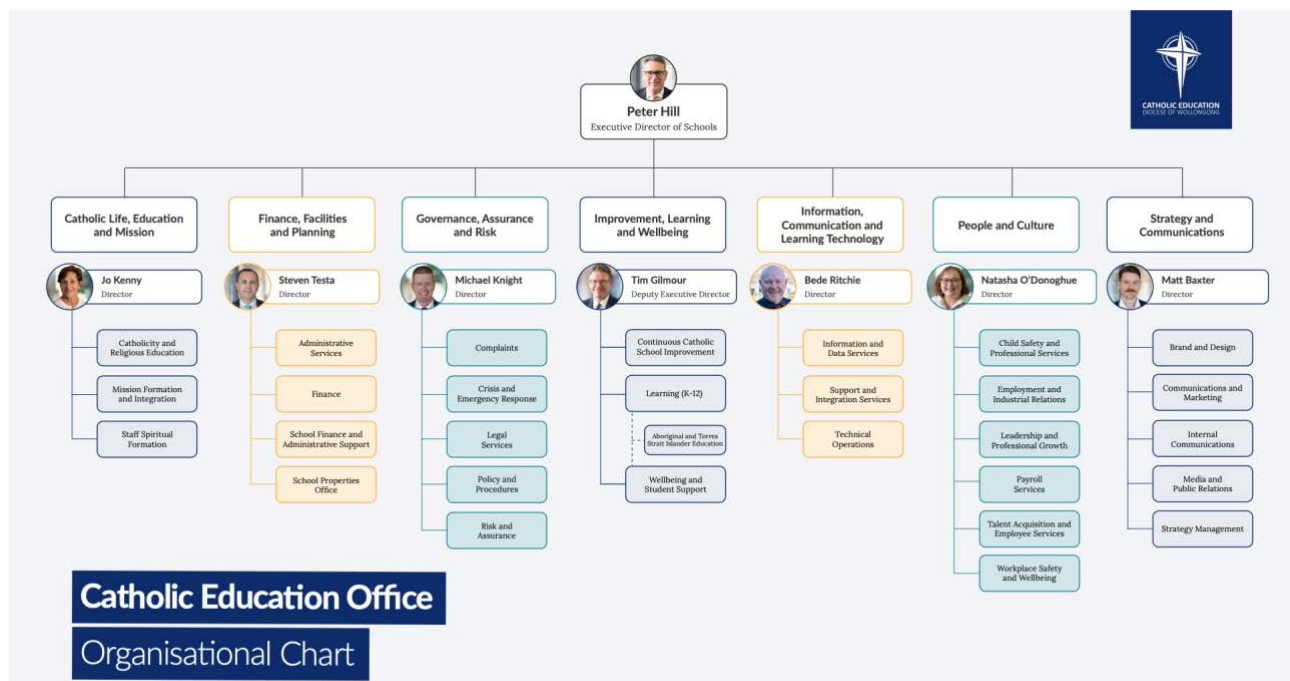
Peter Hill
Executive Director of Schools
Catholic Education Diocese of Wollongong
12 May 2026

Criteria 1 and 2: About Catholic Education Diocese of Wollongong

Our Organisational Structure

CEDoW is a not-for-profit unincorporated organisation operating as a pastoral work of the Diocese of Wollongong. It is the only pastoral work in the Diocese required to report on its supply chains under *the Act*. CEDoW consists of 38 schools and 3 CEO Head Office sites.

An overview of CEDoW's organisation structure in 2025 is shown below:



Our Governance Structure

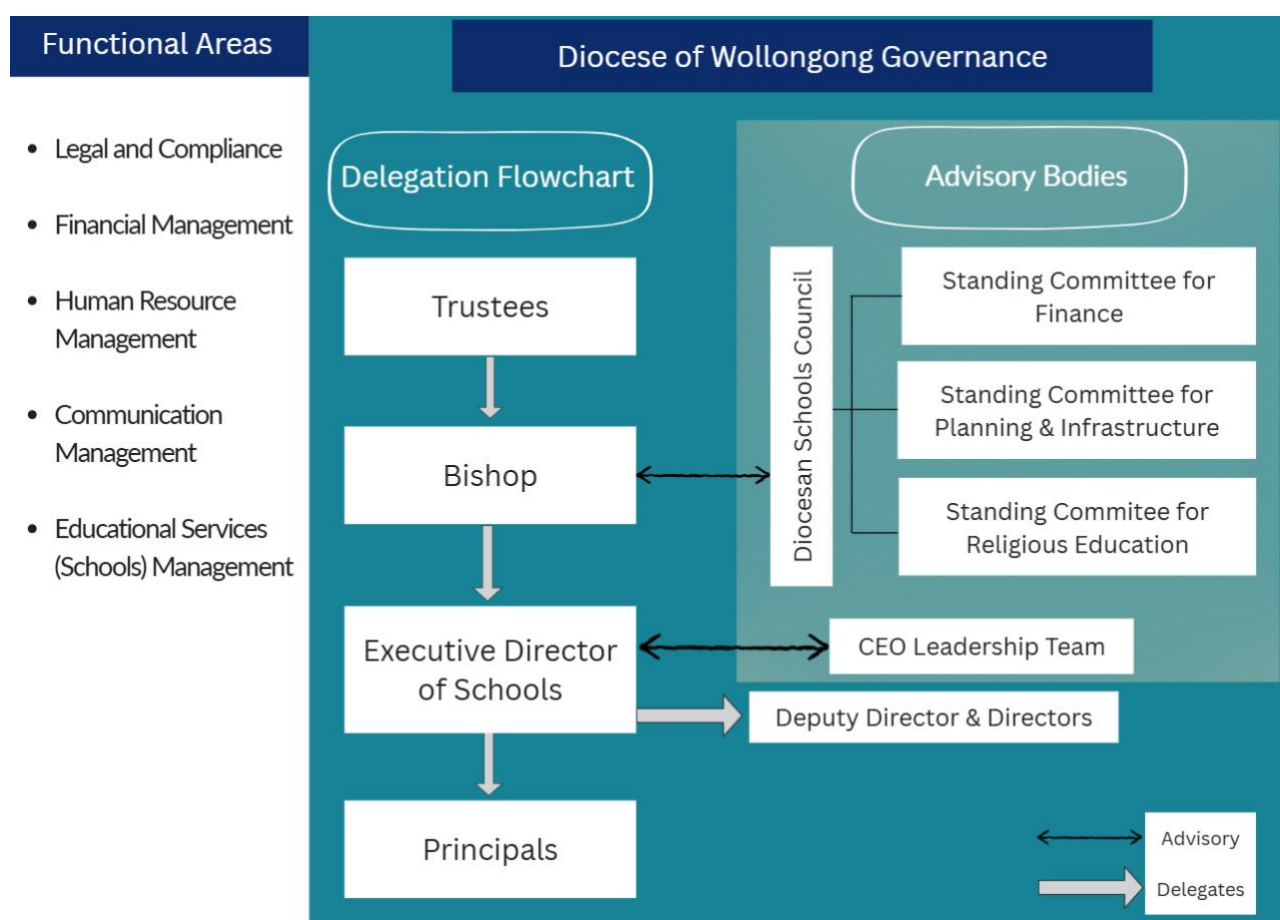
The Executive Director of Schools is delegated by the Bishop of Wollongong, on behalf of the Trustees of the Roman Catholic Church for the Diocese of Wollongong, as the Head of Pastoral Works for Catholic Education. The Executive Director of Schools has responsibility for the delivery of Catholic education through the diocesan system of schools. The Bishop of Wollongong has established a Diocesan Schools Council to advise him on matters related to the delivery of Catholic education. The Executive Director of Schools is the Executive Officer of the Council, which is comprised of:

- Clergy and Senior Members from the Office of the Bishop.
- Senior Members from the Catholic Education Office.
- School Principals.
- Parents of children attending Catholic systemic schools.
- Education sector representatives.
- Local community representatives.

The council is assisted by three advisory bodies:

- The Standing Committee for Finance.
- The Standing Committee for Planning and Infrastructure.
- The Standing Committee for Religious Education.

This structure and the relationship between the bodies is shown in the image below:



Within the CEO, the Executive Director of Schools has established a Leadership Team and delegates authority to the Deputy Executive Director, Directors, and school Principals to carry out the various responsibilities associated with the delivery of quality Catholic education to our students. This is performed in accordance with a comprehensive series of policies and supporting documents. The Service Areas themselves are:

- Catholic Life, Education and Mission (CLEM)
- Finance, Facilities and Planning (FFP)
- Governance, Assurance and Risk (GAR)
- Improvement, Learning and Wellbeing (ILW)
- Information, Communication & Learning Technology (ICLT)

- People and Culture (PaC)
- Strategy and Communications (S&C)

CEDoW's Director of Governance, Assurance and Risk performs the role of Modern Slavery Liaison Officer (MSLO) and chairs the Modern Slavery Working Group (MSWG). The MSWG includes representatives from: GAR, PaC and FFP.

Our Operations

CEDoW is a learning community called to provide a range of high-quality evangelising, educational, pastoral and corporate services that support and challenge Catholic systemic schools to deliver the best possible outcomes for every student and to contribute to the ongoing faith and pastoral life of the Diocese.

CEDoW consists of 29 Catholic parish primary schools, 8 Catholic co-educational secondary schools, 1 K-12 Catholic college and 2 CEO sites. These schools and offices are located in the Illawarra, Macarthur, Southern Highlands and Shoalhaven regions of NSW. As of the August 2025 school Census, the Diocese educated some 20,797 students and employed 2,384 teaching and non-teaching staff. The Leadership Team and the majority of CEO service areas operate out of the Marian Centre, located at 5/280 Keira St, Wollongong NSW 2500.

Annual turnover for the school system in the reporting period was approximately \$432M. The main sources of this income were Commonwealth and State education funding, followed by school fees.

To comply with the requirements of the *Education Act 1990* (NSW), CEDoW entities must undertake market testing for the purchase of any goods and services exceeding \$5k. Purchases or annual service agreements exceeding \$100k require a formal tender process. Supplier service agreements can only be undertaken for a period of three years before further market testing is required. There are some arrangements that may extend to five years, such as uniform, canteen and photocopier agreements, but these are the exceptions. Most purchasing, however, is performed without a written agreement and suppliers are effectively engaged each time a purchase order is raised.

CEDoW also utilises several key related-party Catholic organisations for specific services such as counselling, insurance, industrial relations, ICLT network support and banking.

Our People

At the August 2025 Census, CEDoW employed 2,384 staff of whom 67 identified themselves as Indigenous. A snapshot of this workforce reveals this total comprised 1,599 teaching staff and 785 non-teaching. Of these, 261 employees are engaged across the 2 CEO sites. The gender split of these staff members was 81% female and 19% male employees. Overall, the numbers equated to an FTE of 2134 employees.

Employment and staff wellbeing are managed by our PaC service area. There is a suite of policies in place to ensure compliance with current employment legislation.

Recruitment and selection practices are critical in ensuring our Catholic schools are staffed by the most appropriately skilled, knowledgeable, qualified and competent staff. Succession planning is key to ensuring sustainability of the organisation and the recruitment and selection of staff plays an

important role in this. All permanent roles must be advertised externally. In addition, any migrant workers must have the appropriate working visa before they are engaged by CEDoW.

The recruitment and selection of staff is based on the core principles of:

- evidence-based and procedurally fair decision-making.
- open and transparent declaration of conflicts of interest.
- student-centred decision making.

All employees are engaged under an individual contract or Enterprise Agreement that guarantees statutory and employee specific entitlements under the *Fair Work Act 2009* (Cth).

Staff are encouraged to seek to resolve any issues relating to their employment conditions with their supervisor. Should they be unable to resolve those issues, they are afforded protections when making complaints under CEDoW's *Complaints* and *Whistleblowing* policies.



Our Supply Chain

CEDoW engaged the services of approximately 2,400 third party suppliers during the reporting period, of which only a handful were classified as related parties. There were 125 suppliers whose purchases exceeded \$100k ex GST for the year accounting for 68% of total expenditure. The services these suppliers provided ranged from minor consumables to multi-million-dollar school construction projects.

Whilst some contracts are managed centrally by the CEO, the school system essentially operates under a de-centralised procurement model with most purchasing being undertaken directly by the schools. Provided the appropriate market testing process has taken place, schools retain the autonomy to engage any chosen supplier. Suppliers operating within the Diocesan boundaries are a preferred option as a way of supporting the local community.

In general terms, CEDoW's purchasing is derived from two sources:

- Centralised CEO contracts and purchasing - These are usually high-cost construction and renovation projects and IT-related purchases conducted by the Properties and ICLT departments respectively. The Procurement Officer (Finance) directly manages contracts around utilities, cleaning, waste and recycling, cash collection and key uniform services.
- School contracts and direct purchasing – These are usually single site agreements or individual school acquisitions. This would include purchases of educational supplies, cleaning and other consumables and engaging services such as grounds and general maintenance, photocopying, security and canteens.

To secure commercially attractive pricing, schools and Head Office sites are encouraged to use buying groups such as Procurement Australia and approved Government suppliers listed on the *buy.nsw* website. CEDoW's status as a not-for-profit organisation entitles it to request Government contract pricing when seeking a quote for which a Government contract or scheme exists.

CEDoW is looking to centralise more of its purchasing across the 40 sites in the coming years, to mirror the current arrangement in other Catholic Dioceses, for both commercial reasons and to rationalise the number of suppliers being used.

Whilst virtually all CEDoW's suppliers are based in Australia, many of these would source their goods from regions overseas that would include countries deemed at high risk of modern slavery practices.

Criteria 3: Slavery risks in operations and supply chain

Operational Risks

CEDoW has robust recruitment practices and, as an education provider, is subject to strict legislative obligations. In this context the risk of modern slavery practices occurring is negligible. All employment is managed centrally through CEDoW's PaC service area which ensures a fair and consistent approach to engaging staff. For further information on the labour practices employed in the Diocese, refer to the section, *Our People* under Criteria 1 and 2.

For Catholic entities, modern slavery risks are defined by the ACAN Category Risk Taxonomy, a classification standard that identifies severity of actual or potential harm to people (saliency) in spend categories. These classifications are shown in the table below:

Classification

High Risk	Medium Risk	Low Risk
• Building and construction • Cleaning and Security • Events and event management • Facility management and property maintenance • Finance and Investment • Food and catering services • Furniture and office supplies • ICT Hardware • ICT Software and network services - offshore • Labour Hire • Linen, laundry and textile products • Medical devices and supplies • Transport, logistic and warehousing • Uniforms and PPE • Waste management services	• Advertising & Marketing • ICT Software and network services - onshore • Utilities • Fleet management, consumables and maintenance • Travel and accommodation • Print / Mail Provider	• Professional services • Financial expenses • Government and agency fees • License / membership fees

Note: The following categories are Not in Scope of the ACAN Category Risk Taxonomy

- Pastoral
- Payroll (excluding labour-hire and sub-contracting)

The ACAN Category Risk Taxonomy is based on sources such as:

- the Global Slavery Index
- the International Labor Organisation (ILO), including definitions of modern slavery
- the Bureau of International Labor Affairs (ILAB), U.S Department of Labor
- the Global Child Forum and UNICEF

Four key factors are also used to determine the level of risk:

- **Geography:** the country or location where a good is made or service is delivered
- **Industry:** the sector in which the making of goods or delivery of service occurred
- **Commodity:** the raw materials or components that comprise the goods or products
- **Workforce vulnerability:** such as bonded visas, temporary migrants, women or children known to be employed in specific industry sectors
- **Domus 8.7:** trends, cases, and risk intelligence identified through the Domus 8.7 remediation service, including grievances and remediation insights relevant to category and risk to workers.

Therefore, the focus of CEDoW's risk management program are those Suppliers in the industries deemed at high-risk of having modern slavery practices in their supply chains. Many of these high-risk sectors typically employ potentially vulnerable people such as new migrants, temporary work visa holders, international students and undocumented workers. Some may be engaged via subcontracting arrangements with a high rate of noncompliance with workplace rights and entitlements.

Supply Chain Risks

To identify its high-risk providers, CEDoW has allocated the ACAN Risk Taxonomy categories to each supplier in its accounts payable system to facilitate the production of spend reports by category, such as those shown below.

This allocation demonstrates where the expenditure is going and with whom. The analysis below is based on all 2,400 third party suppliers that CEDoW purchased goods and services from during the reporting period. The overall spend by the school system with these suppliers was some \$68M ex GST.

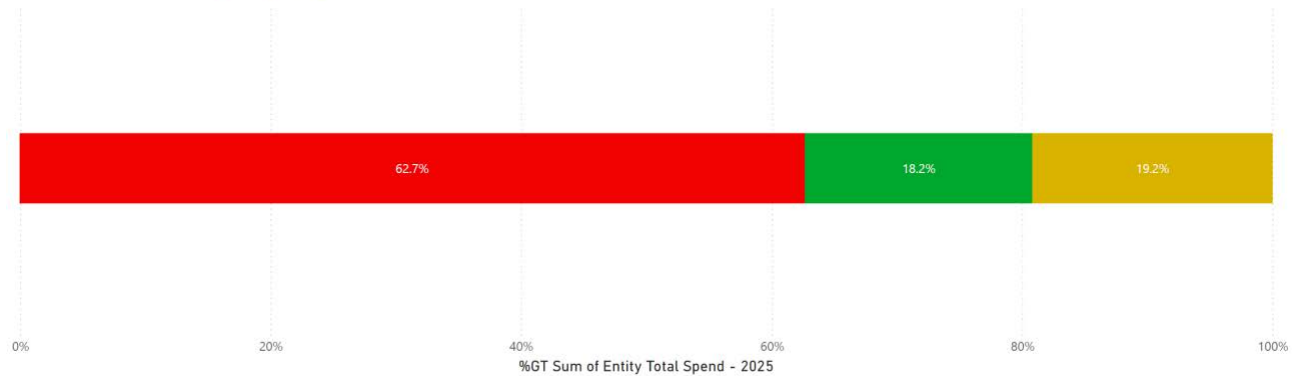
As in previous periods, the results indicate the majority of CEDoW's expenditure was on goods and services considered at high risk of modern slavery practices. These include building and construction, ICT hardware, facility maintenance, furniture and office supplies, cleaning and security, event management, and food and catering. Equipment and consumables used in a number of these sectors are largely manufactured overseas, predominantly in high-risk countries such as China, India and Vietnam.



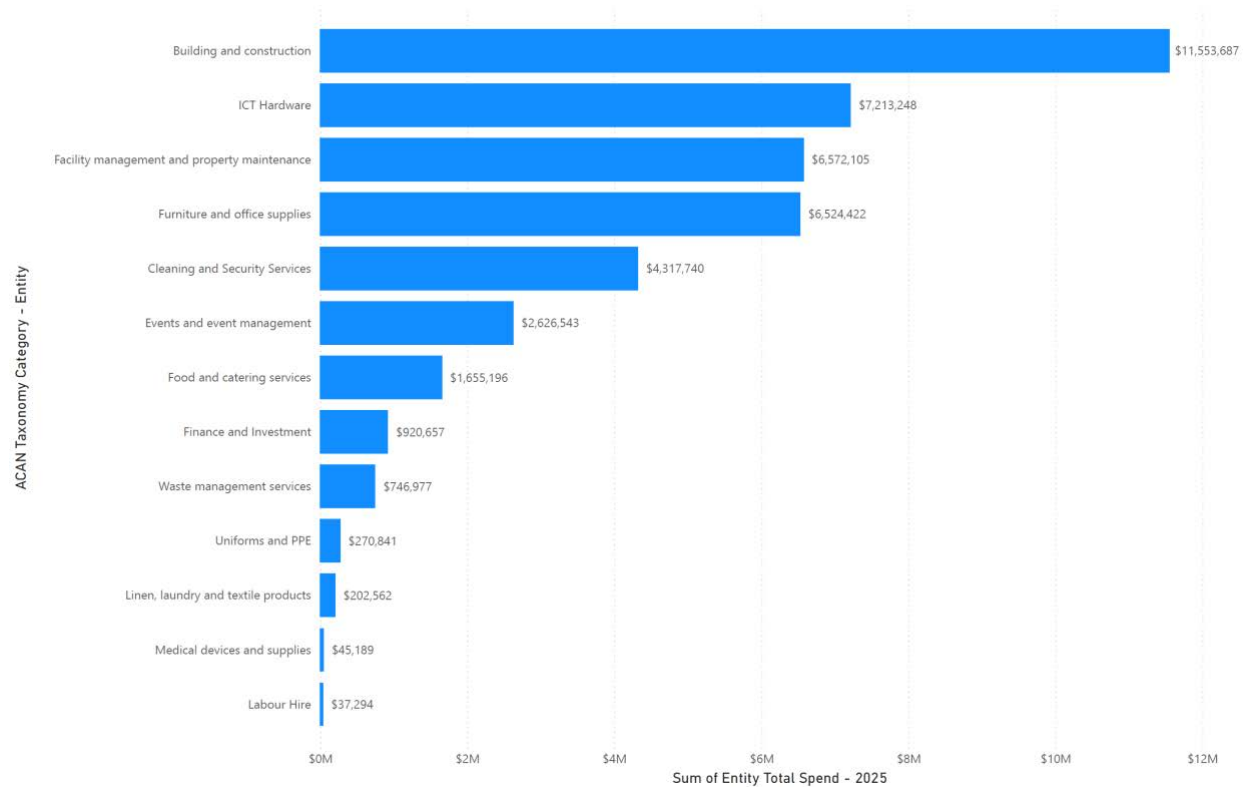
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%GT Sum of Entity Total Spend - 2025 by ACAN Taxonomy Risk - Entity

ACAN Taxonomy Risk - Entity ● High ● Low ● Medium



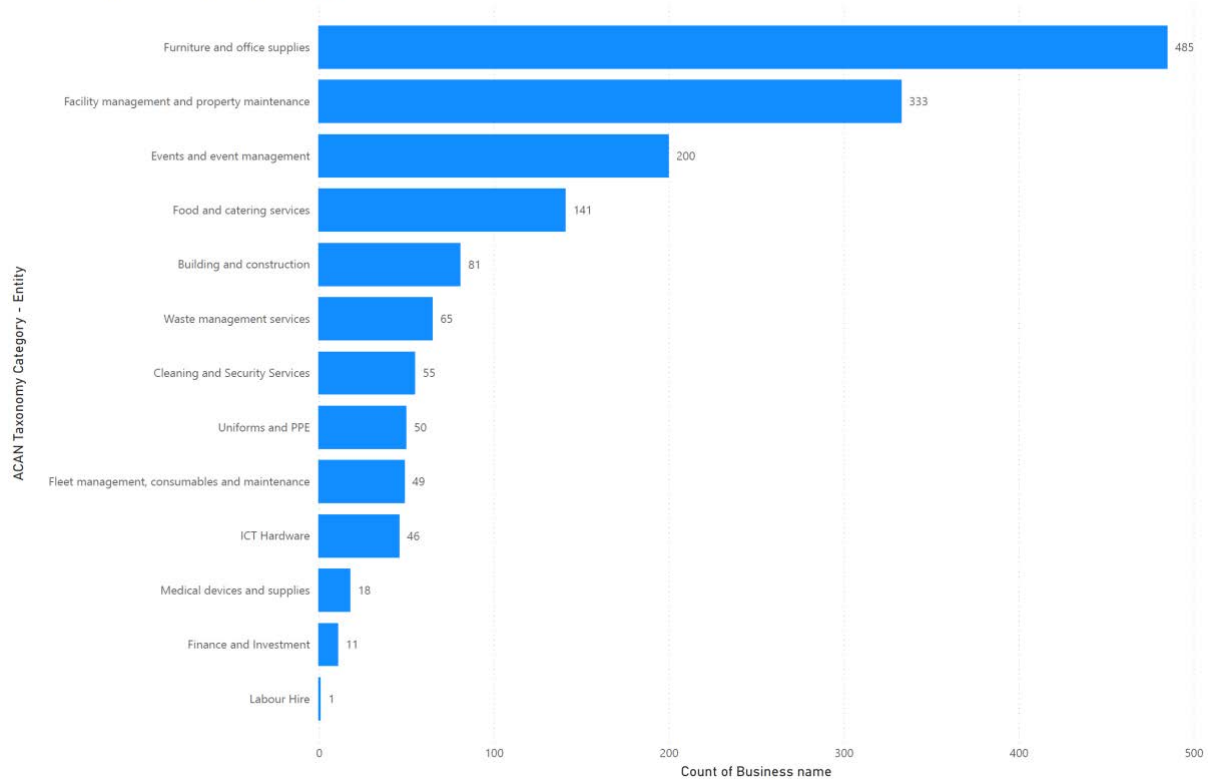
Sum of Entity Total Spend - 2025 by ACAN Taxonomy Category - Entity





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Count of Business name by ACAN Taxonomy Category - Entity



Supplier Engagement Overview

ACAN Entity File

ENTR-49 | Catholic Education Diocese of Wollongong

Total suppliers

2,395

Suppliers in High Risk procurement categories

1,514

ACAN Supplier Surveys completed

582

ACAN Supplier Surveys completed in 2025

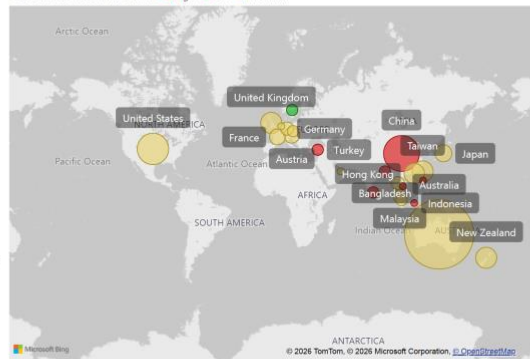
232

Suppliers identified for Sedex Onboarding

81

Sourcing Countries for Tier 1 Suppliers

Overall inherent risk cate... ● high ● low ● medium



Supplier e-mail shared

677

Supplier Communication

478

Suppliers completing e-learning

20

Supplier Screening - ACAN Collated

Enhanced 3rd Party Supplier Screening 3rd Party Supplier Screening - High and Medium Risk

529

25

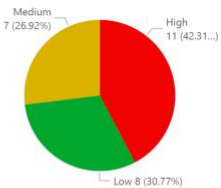
Suppliers on Sedex

35

SAQs Completed

15

Sedex SAQ Risk Category



Audits in 2025

0

Audits Findings in 2025

0

Criteria 4: Actions taken to assess and address risk

Actions Taken to Mitigate Risk

CEDoW has undertaken a range of initiatives in both the prior and current reporting period to mitigate the risk of modern slavery practices existing in its supply chains. The key actions are below:

- In recognition of CEDoW's commitment to eradicating modern slavery practices the Director of Governance, Assurance and Risk has assumed the role of MSLO and now chairs the MSWG meetings. As a member of CEDoW's Executive Leadership Team the Director of Governance, Assurance and Risk has greater influence and ability to monitor and change behaviour.
- The ACAN Program provides supplier engagement support and data, enabling a systematic and comprehensive supply chain risk assessment. In 2025, the ACAN Modern Slavery Risk Management Program launched a new purpose-built data management platform - ROTA. ROTA centralises the ACAN Risk Management Program framework and facilitates supplier performance evaluation and engagement.
- The ACAN modern slavery contract clauses continue to be used in the CEDoW agreement templates used at both CEO and school level. Similarly, tender invitations note CEDoW's modern slavery commitment and usually include a request the supplier provide a copy of their Modern Slavery Policy as part of their tender submission.
- Through ACAN, CEDoW continues to invite it's Top 50 high-risk, high-spend suppliers to register with Sedex (Supplier Ethical Data Exchange). Sedex provides one of the world's leading online platforms to help companies manage and improve working conditions in their supply chains by providing tools such as a self-assessment questionnaire and Audits.

This Top 50 listing is updated in January and October each year as the spending pattern with various suppliers is fluid and CEDoW wants to ensure it is targeting key suppliers used on an ongoing basis. ACAN facilitates the invitations to these key suppliers to register with Sedex.

The Sedex Self-Assessment Questionnaire (SAQ) helps suppliers to evaluate their practices against established standards and identify areas for improvement

- To increase internal awareness of Modern Slavery, CEDoW Staff were once again invited to undertake the 3 ACAN modern slavery eLearning modules located in *People and Culture's* Learning Management System. This was advertised in the school systems' internal *Gateway* newsletter several times across the period. From 2025, the *Modern Slavery 101* eLearning module became a mandatory part of *People and Culture's* new staff induction day program.
- All active suppliers in CEDoW's accounts payable system continue to be allocated a modern slavery risk category based on the ACAN Risk Taxonomy. This facilitates supplier reporting when compiling the annual Statement and identifies those candidates to be targeted for Sedex membership.

- The ACAN Prequalified Supplier List was downloaded and broadcast to all schools. This exercise is performed annually.
- The CEO's Accounts Payable section broadcast a notice to all suppliers regarding a change of address for its Head Office operations. This communication included a reference to CEDoW's expectation that their supply chains are free from modern slavery practices.
- To ensure CEDoW's compliance strategy is consistent with other Catholic reporting entities, the agreement with ACAN covered the current reporting period and is due for renewal in June 2026.
- The MSWG met 4 times during the reporting period with a general focus on supplier engagement.
- No reports of potential or actual non-compliance with CEDoW's [Modern Slavery Policy](#) were received by the MSWG from our school or suppliers during the reporting period.
- CEDoW's 2024 *Modern Slavery Statement* was published on the Diocese website in June 2025.
- Case Study: To address the deemed risks associated with its various *Waste and Recycling* providers, CEDoW undertook a centralised tender during the reporting period to ensure there is one provider going forward. Previously, these suppliers issued individual schools with their own agreement, but under this process, the successful tenderer had to complete CEDoW's agreement template. That document includes modern slavery clauses, a confirmation their staff are employed under the *Waste Management Award 2020 (MA000043)*, and a requirement the supplier register with Sedex for the duration of the agreement.

Our plans for 2026 and Beyond

CEDoW's commitment to eliminating modern slavery practices within its supply chains is a long-term one that will require a substantial investment of time and resources. The objective is to continually improve our systems and supplier engagement strategies each year.

CEDoW's planned actions in the next reporting period are as follows:

- Commencing in 2026 all staff must annually complete the *Modern Slavery 101* eLearning module (previously only new staff were required to complete the module at the time of employment)
- The composition of the MSWG will be reviewed and refreshed to ensure appropriate representation from service areas dealing with high risk procurement (such as IT).
- Continue to encourage key high-risk, high-spend suppliers to register with Sedex to assess the risk of modern slavery practices in their supply chains.
- Continue to share approved ACAN resources, especially supplier webinars, with key suppliers to increase their awareness of modern slavery risks in their own supply chains.
- Encourage all staff to undertake the three ACAN modern slavery eLearning modules to increase their awareness of the modern slavery issue.



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- Ensure schools use CEDoW's standard tender and contract templates as they include a suite of ACAN modern slavery contract clauses that highlight the supplier's responsibilities around their supply chains. This is preferred as suppliers' agreement documents are often silent on the issue of modern slavery.
- Continue to allocate the ACAN risk categories to all new suppliers in the accounts payable system to ensure reports can be generated that identify the high-risk, high-spend suppliers as needed.

Remediation Process – Domus 8.7

CEDoW is a founding member of Domus 8.7. This was established as an agency of the Catholic Archdiocese of Sydney in 2020 as a key element of the ACAN Modern Slavery Risk Management Program. This collaborative approach to remediation is aligned with the Modern Slavery Act and Catholic Social Teaching which are centred on the needs, wellbeing and empowerment of people impacted.

Domus 8.7 provides CEDoW:

- resources that enable us to listen to workers (grievance channel)
- a 24/7 careline for workers on our sites, staffed by professional counsellors
- direct support to people impacted by modern slavery
- guidance and technical assistance to prevent, identify and remediate modern slavery
- a documented process to assess if an organisation has caused, contributed or is directly linked to modern slavery and modern slavery indicators

Domus 8.7 empowers people impacted by modern slavery to have choice and control over what forms of remediation are meaningful to them and to engage safely with business/supply chain actors. Supports may include:

- modern slavery indicator assessment
- needs assessment, case coordination, response and remediation planning
- referrals to community, social services, unions
- transport, accommodation, financial and food support
- legal support, referrals, accompaniment and advocacy
- job training, retraining and redeployment
- accompaniment and advocacy to engage with government and law enforcement agencies
- opportunities to contribute lived expertise to improve modern slavery responses

The Domus 8.7 Advisory Committee Members also include a person with lived expertise, Mr Moe Turaga. Domus 8.7 is a registered charity with the Australian Charities and Not-for profits Commission (ACNC) and is an endorsed Public Benevolent Institution with Deductible Gift Recipient (DGR) status (ABN 244 72497189).

A documented remedy pathway is an important requirement of the Modern Slavery Act. CEDoW is committed to ensuring it provides appropriate and timely remedy to people impacted by modern slavery in accordance with the United Nations Guiding Principles on Business and Human Rights, *the Act* (Guidance for Reporting Entities) and relevant Australian laws. This includes providing for, or cooperating in, actions to address harm to people and root causes to mitigate future risks if CEDoW is found to have caused or contributed to modern slavery.

CEDoW's remediation efforts will be enhanced in future through further policy development, detailed response procedures and engagement with Domus 8.7 and other civil society stakeholders. By partnering with Domus 8.7, CEDoW can help people impacted by modern slavery achieve meaningful outcomes that can be reported on and continuously improve risk management and our response.

Where CEDoW is directly linked to modern slavery by a business relationship, it is committed to working with the entity that caused the harm to ensure remediation and mitigation of its recurrence. Remediation obligations and expectations are included in contracts with high-risk suppliers who must notify and consult with CEDoW to support victim centred remediation processes are implemented to the satisfaction of CEDoW.



CATHOLIC EDUCATION
DIOCESE OF WOLLONGONG

When suspicions of modern slavery practices come to our attention through whistleblowing or other channels, staff will contact relevant law enforcement agencies and/or Domus 8.7 for an assessment, investigation, action planning and implementation of a remediation process.

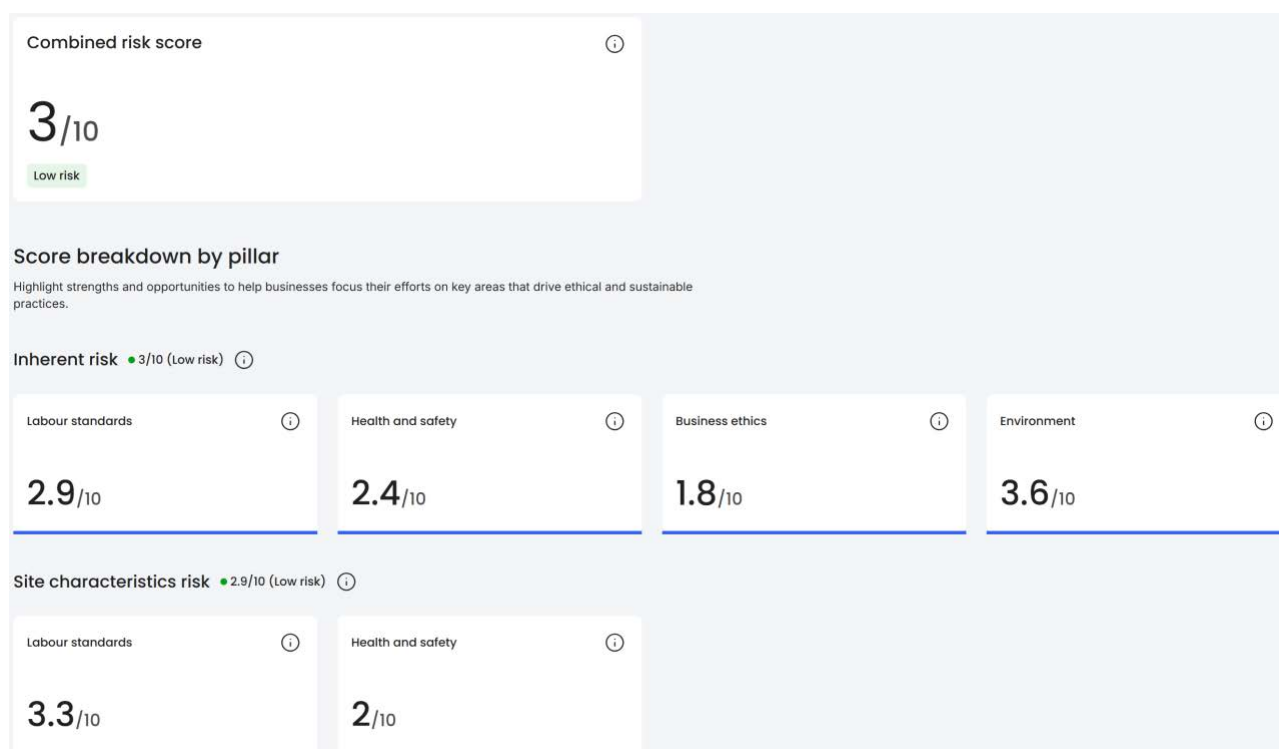
Criteria 5: Effectiveness Assessment

Continuous improvement – Sedex SAQ

Collaboration is at the heart of accelerating progress and includes opportunities to measure social, environmental and governance (business ethics) risks and actions with peers in our network.

In its foundational stages, CEDoW used an internally devised ACAN framework to measure progress. This bespoke approach reflected the unique priorities, constraints, and practices across Catholic organisations.

In 2025, the ACAN Program adopted a globally recognised risk measurement system through Sedex. This aligns reporting entities with a methodology that combines global data about risks in different countries and industries with site-specific information from the Sedex platform. Sedex regularly updates the methodology to ensure it is aligned with new and emerging risks. Therefore, completion of the Sedex SAQ is a substantial measure of continuous improvement year on year. Below is an explanation of how scoring is calculated using the Sedex SAQ and CEDoW's 2025 risk scores and management controls that will serve as our benchmark for continuous improvement.



Combined Risk Score 0/10 - This is calculated from inherent risk and site characteristics, adjusted for management controls and audit results. The score is broken down by pillar and highlights strengths and opportunities to focus our efforts on key areas that drive ethical and sustainable practices.

Inherent Risk Score 0/10 - This predicts potential risks based on a country/region, and sector. Spanning all four pillars, this score is broken down by topics. It can be used as a baseline to identify

Management Controls Score 0/5 - This score measures how well policies or processes are in place to reduce the risks from the site characteristics. It is also based on answers in the SAQ. A Poor score of 0-0.9 indicates that there are few or no controls in place. An Advanced score of 4-5 indicates that there are exemplary controls that exceed compliance and drive innovation.

Labour standards - evaluate policies and processes to ensure fair labour standards and worker protections are effectively managed.

Health and Safety - reviews the adequacy of safety protocols, emergency preparedness and training efforts to manage health and safety risks on site.

Business Ethics - evaluates controls against unethical practices such as anti-bribery policies, compliance with legal standards and transparent operations.

Environment - looks at policies managing environmental impact, resource efficiency and waste reduction practices to align with sustainability standards.

Overall, these results indicate CEDoW's controls are reasonable to good in the various categories.

Continuous improvement – Baseline Data

The ACAN baseline data table below provides a comparative measure of supplier engagement and program activities to measure progress and inform future action planning using current data against the prior year:

Catholic Education Diocese of Wollongong	ACTIVITY	2024	2025
INTERNAL / STAFF	Hours spent on modern slavery activities	100	80
	Individual staff completed e-learning	16	8
	E-learning modules completed	40	15
EXTERNAL / SUPPLIER ENGAGEMENT	Total number of suppliers	2635	2393
	Number of suppliers with visible contact information and ABN	62	677
	Number of suppliers across high-risk categories	1611	1516
	Number of ACAN Supplier Surveys completed	81	582
	Supplier staff attending capacity building webinars	20	20
	Invited to join Sedex	27	81
	Joined Sedex	36	35
	Sedex SAQ completed	14	15
	Social audits	1	0
	Corrective actions	3	0
DOMUS 8.7 EXTERNAL REFERRALS	Contacts made via worker voice / grievance mechanism	0	0
	Referrals for advice and assistance	0	0
	Individuals identified or referred for modern slavery assessment	0	0
	Individuals with modern slavery cases remediated	0	0

Criteria 6: Consultation with entities owned or controlled

CEDoW continues to manage the compliance around modern slavery *centrally* through the MSWG. At this stage, little action is required at school level other than to:

- Use the CEO tender and contract templates that include the ACAN modern slavery clauses.
- Consider using the companies from ACAN's *Prequalified Supplier List*. This list is distributed by the MSLO annually.
- Encourage key staff in the CEO and schools to undertake the 3 ACAN modern slavery eLearning modules to increase their awareness of the issue.
- Advise the MSWG where they become aware of a supplier's potential breach of CEDoW's [Modern Slavery Policy](#).

Criteria 7: Other

- Members of the MSWG are invited to attend the monthly ACAN webinars as well as the supplier webinars conducted by ACAN across the year.
- The MSLO has requested through the Diocese Bishop's Office that its Parishes offer a Mass each year for the patron of modern slavery, St. Josephine Bakhita, around her feast day of 8th February. A notice is also placed in the *Gateway* newsletter each year informing the schools of this day and includes prayer resources provided by ACAN.
- The MSLO registered with the *Office of the NSW Anti-Slavery Commissioner* to obtain updates and notices from the Commissioner and attended an on-line forum on modern slavery during the reporting period.
- In May each year, the MSLO arranges a notice in the *Gateway* newsletter highlighting World Fair Trade Day that encourages schools to consider sourcing recognised Fair Trade products displaying the logo at right.



Modern Slavery



Disclosure Note

This statement has been made on behalf of Armidale Catholic Schools. Covering the reporting period 1 January 2025 to 31 December 2025, this statement focuses solely on work performed by Armidale Catholic Schools, ABN 90 702 916 776

The Head Office is at Unit 2/131 Barney Street, Armidale NSW 2350.

Website: <https://www.arm.catholic.edu.au>

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Authorisation by Armidale Catholic Schools Chair, Peter Maher

I present this Modern Slavery Statement for the Catholic schools throughout the Diocese of Armidale.

As one of the largest non-government employers and producers of goods and services in Australia, the Catholic Church holds a pivotal role in ensuring that our workplaces and practices are free from all forms of modern slavery.

Armidale Catholic Schools is committed to upholding human rights and taking meaningful action to identify, address, and mitigate the risks of modern slavery within our operations and supply chains. We closely partner with the Australian Catholic Anti-Slavery Network (ACAN) to leverage our collective influence and drive the urgently needed change.

This Modern Slavery Statement outlines the actions we have taken throughout 2025 to assess and address the risks of modern slavery. We acknowledge this is a continuing journey and reaffirm our commitment to improving this vital area.

On behalf of the Board of Armidale Catholic Schools, I fully support this statement and encourage all Catholic schools within the Diocese of Armidale to deepen their understanding and explore ways to collaborate in creating a world free from modern slavery.

Peter Maher
Chair, Armidale Catholic Schools
Date:

Approval

This Modern Slavery Statement was approved by the principal governing body of The Diocese of Armidale as defined by the Modern Slavery Act 2018 (Cth) ("the Act") on 5th June 2026. This modern slavery statement is signed by a responsible member of Armidale Catholic Schools as defined by the Act.

Reporting Criteria 1: About Armidale Catholic Schools

About Armidale Catholic Schools

Armidale Catholic Schools (ACS) provides educational, administrative, ICT, industrial, financial, and employment services support for 24 schools—19 primary, 2 central, and 3 secondary—across a wide rural and remote geographical area in the New England and North West regions of NSW.

Our Catholic school system provides a Catholic education to **6,144** students and employs approximately 1200 staff. It works closely with our Parishes and Parish Priests to further Jesus' mission.

As a Catholic professional learning community, we are committed to improving the faith, learning, and wellbeing outcomes of our young people and communities. We work together to ensure literate and numerate students for a hope-filled future.

Our system is culturally diverse, with **15.9%** of students identifying as Aboriginal and Torres Strait Islander.

Vision & Mission



Our Vision

A Christ-centered inclusive learning community that supports young people to realise a hope-filled future.

Our Mission

A Catholic professional learning community committed to improving faith, learning and wellbeing of our students, staff and families.

Catholic Principles & Values



**PRIMACY
OF GOD**



**SANCTITY
OF LIFE**

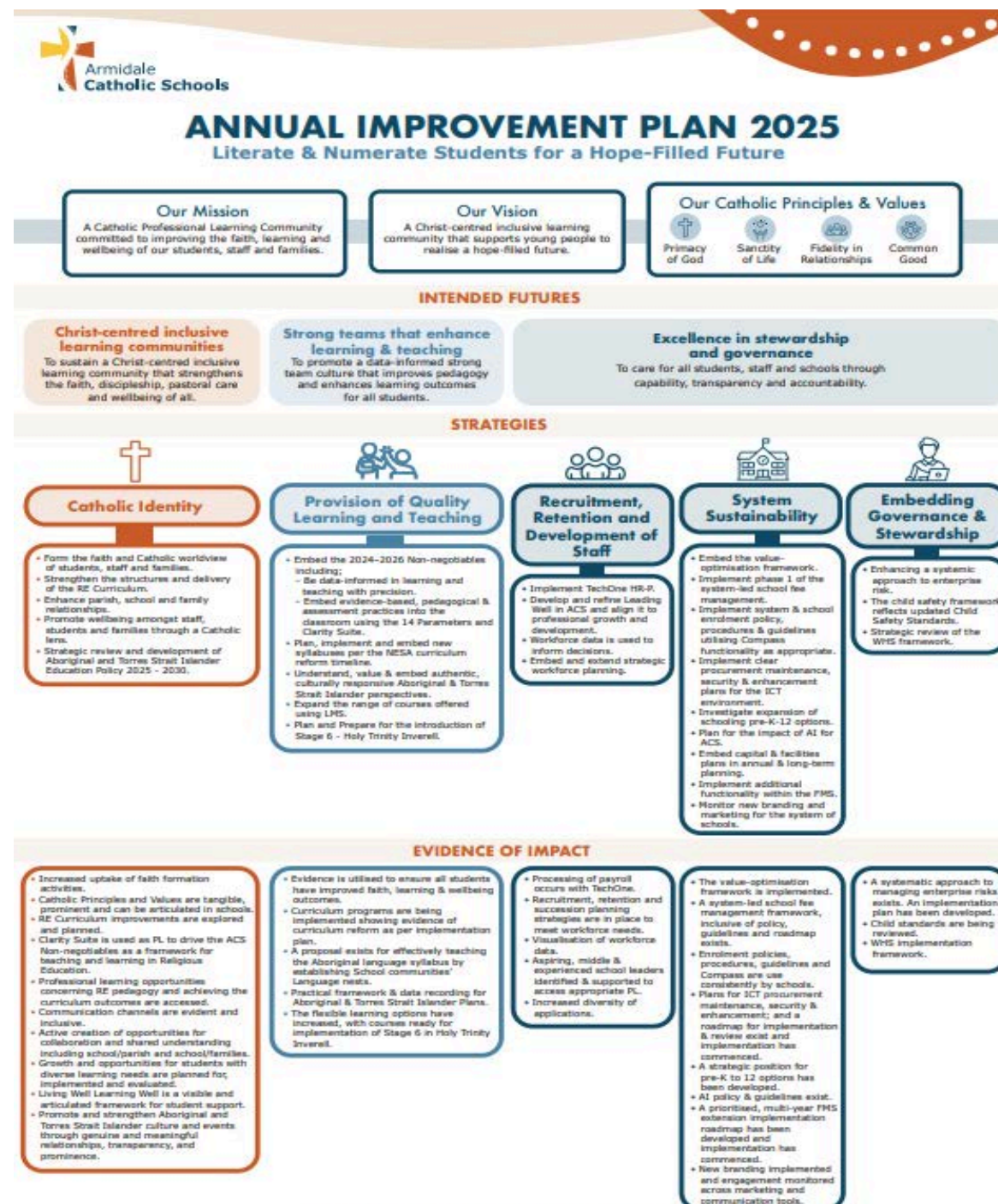


**FIDELITY IN
RELATIONSHIPS**



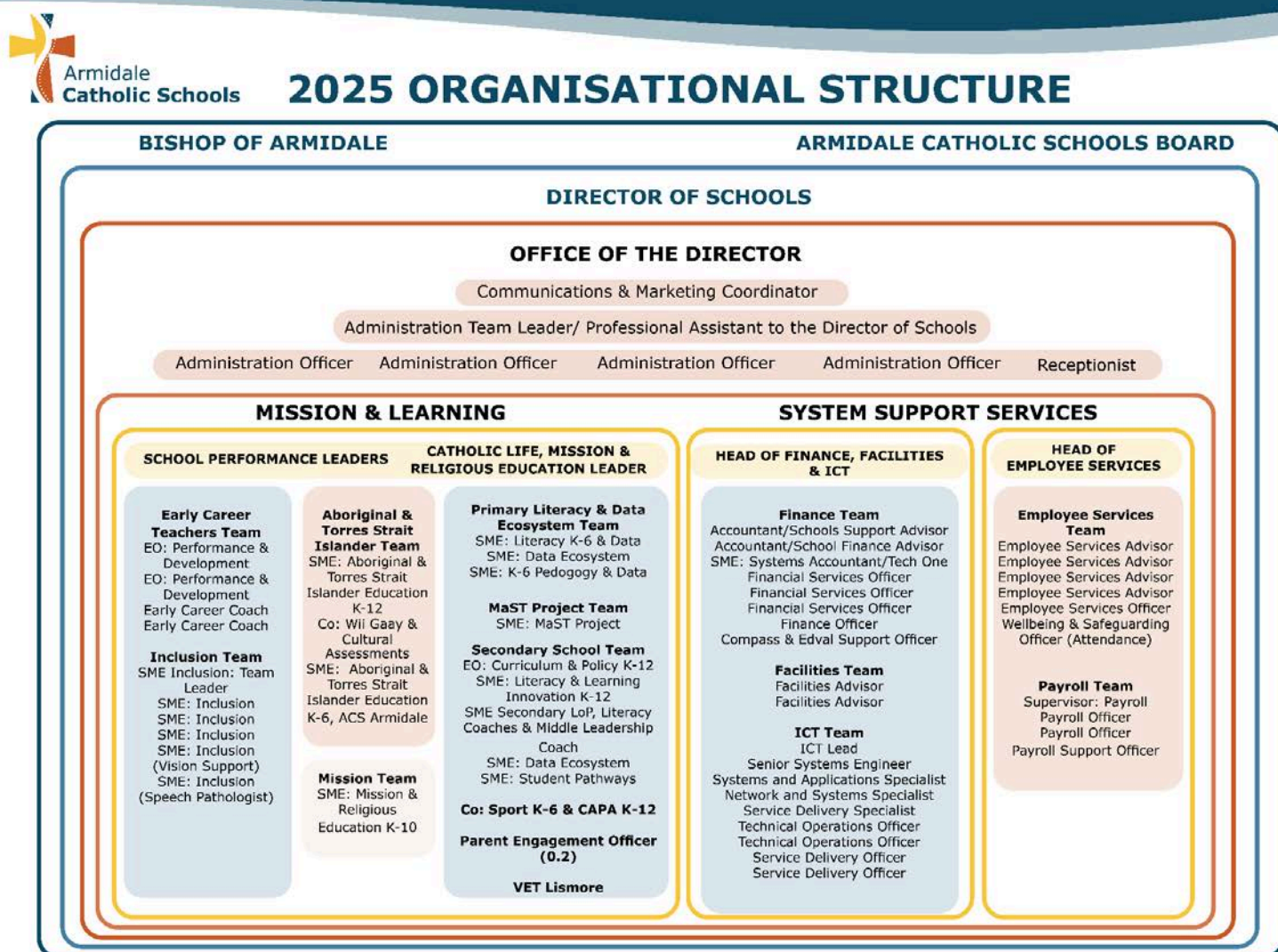
**COMMON
GOOD**

Annual Improvement Plan



Reporting Criteria 2: Our Organisational Structure, Operations and Supply Chains

Our Organisational Structure



Governance

The Trustees of the Roman Catholic Church for the Diocese of Armidale are the sole members of the incorporated entity under the leadership of Bishop Peter Murphy. The Board of Directors are responsible for the organisation's overall governance and strategic direction. It provides "overall superintendence", overseeing both performance and compliance in accordance with the organisation's purpose and objectives. The Board delegates the responsibility for the management of the schools to the Executive Director of Schools, Ms Reginz Menz, and the Executive Leadership Team. Armidale Catholic Schools has been acknowledged as a separate entity for taxation purposes, being allocated its own ABN.

The education and formation of students in Catholic discipleship are at the heart of our Catholic school system. Armidale Catholic Schools provides quality learning and teaching in a faith-centred environment.

Armidale Catholic Schools was established as the agency to deliver Catholic Education in the Armidale Diocese. ACS works hand in hand with the other agencies of the diocese in fulfilling the Church's mission. ACS, as an agency of the Trustees of the Roman Catholic Church for the Diocese of Armidale, is covered under the auspices of the Roman Catholic Church Property Trust Property Act 1936.

ACS's primary responsibility is to support and advance Catholic education while complying with legal requirements, with a focus on creating safe professional environments across all schools and workplaces, as well as a commitment to child safety.

In February 2020, the Armidale Catholic Schools Board was established by the Bishop of Armidale as a deliberative body to advise him on education policy for Catholic schools within the Diocese of Armidale.

Armidale Catholic Schools has established a working Modern Slavery working group with a representation from Finance, Facilities & ICT. The Working Group is sponsored by the Head of Finance, Facilities, and ICT.

Overall governance of Modern Slavery lies with Bishop Peter Murphy and the ACS Board. The Leadership Team of ACS is responsible for overseeing Modern Slavery.

The Finance Team is responsible for all Modern Slavery requirements, and the Head of Finance, Facilities & ICT is a member of the Leadership Team.

Operations

In 2025, Armidale Catholic Schools managed 24 Catholic Schools - (19 primary schools, 3 secondary schools and two central schools K-Yr 10, 6,144 students and 1,145 staff. The Armidale Catholic Schools Support Teams (central office) in Armidale manages all the activities that can be separated from the schools (i.e. payroll, accounts payable, recruitment, provision of technology, professional learning, facilities, etc) so schools can focus on their core business of teaching and learning.

ACS Revenue and Expenditure

Charity details

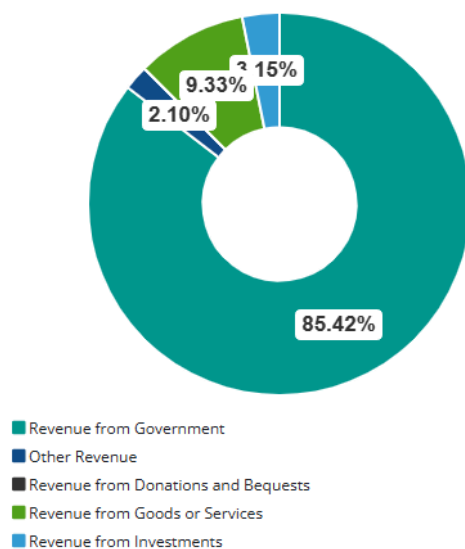
ABN:	90702916776
Address:	131 Barney Sreet Armidale NSW, 2350
Email:	cso@arm.catholic.edu.au
Address For Service email:	hbentham@arm.catholic.edu.au
Website:	arm.catholic.edu.au
Phone:	0267 727388
Charity Size:	Large
Who the charity helps:	Aboriginal and Torres Strait Islander people Children - aged 6 to under 15 Early childhood - aged under 6 Females Males People in rural/regional/remote communities People with disabilities Youth - 15 to under 25
Date established:	31 December 1959
Last reported:	2 July 2025
Next report due:	30 June 2026
Financial year end:	31/12

Financial overview

Financial information from the latest [AIS](#).

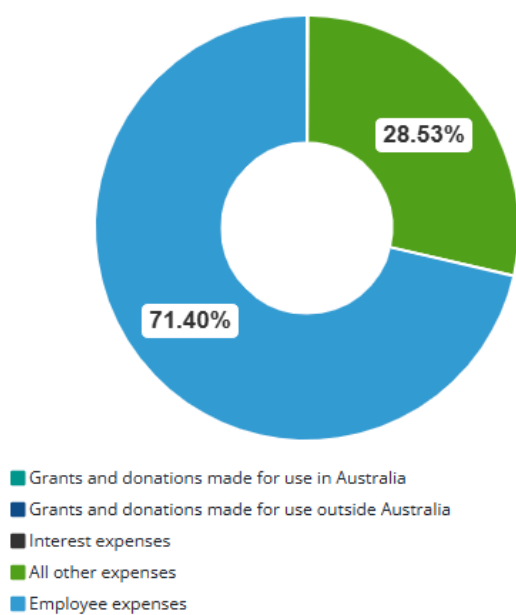
Revenue

Total revenue: \$150,700,321.00

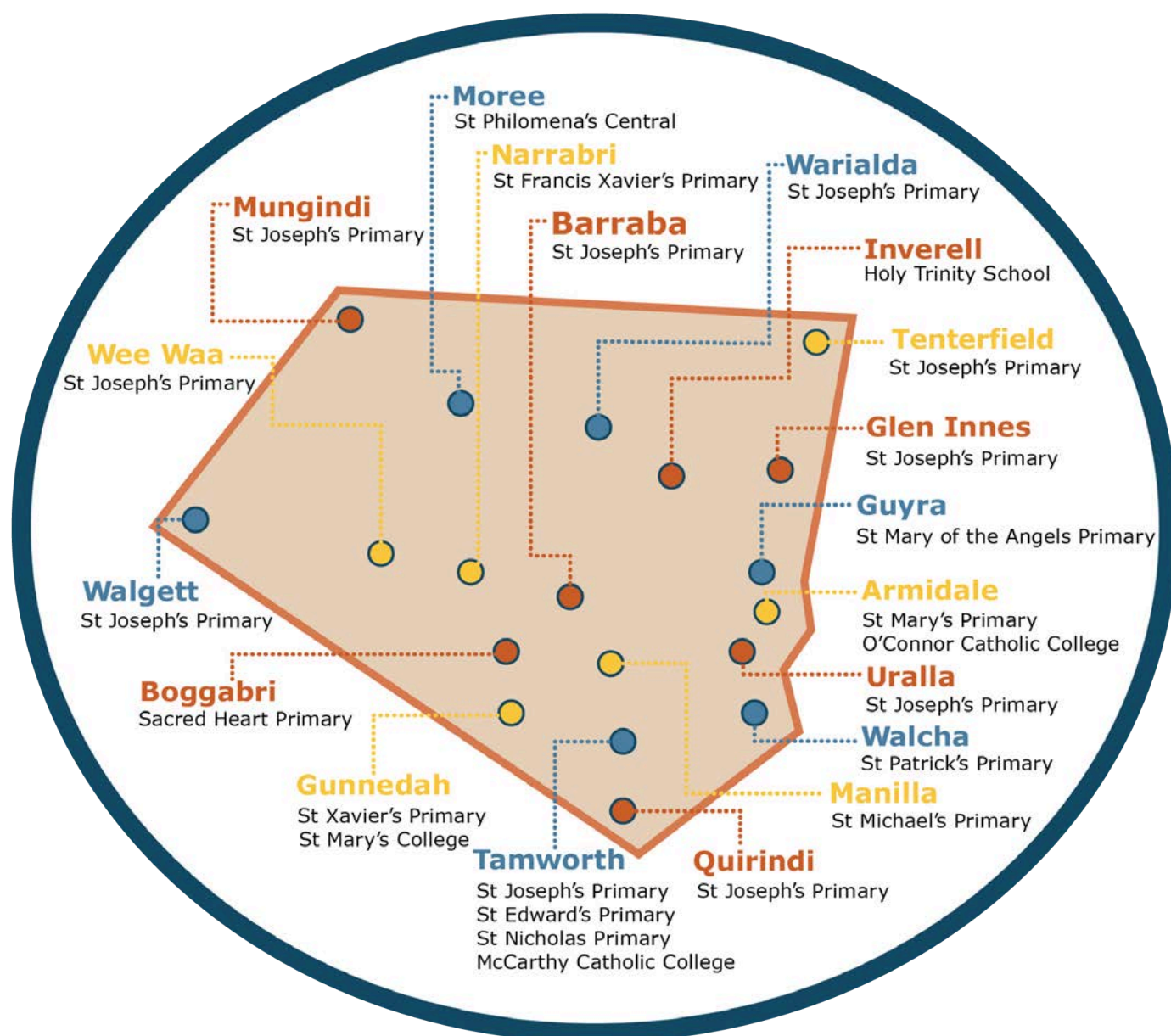


Expenses

Total expenses: \$155,838,797.00



School locations within the Diocese of Armidale



Reporting Criteria 3: Modern slavery risks in operations and supply chain

Risk Assessment

For Catholic entities, modern slavery risks are defined by the ACAN Category Risk Taxonomy, a classification standard that identifies severity of actual or potential harm to people (saliency) in spend categories.

The ACAN Category Risk Taxonomy is based on sources such as:

- the Global Slavery Index
- the International Labor Organisation (ILO), including definitions of modern slavery
- the Bureau of International Labor Affairs (ILAB), U.S Department of Labor
- the Global Child Forum and UNICEF

Four key factors are also used to determine the level of risk:

- **Geography:** the country or location where goods are made or services are delivered
- **Industry:** the sector in which the making of goods or delivery of service occurred
- **Commodity:** the raw materials or components that comprise the goods or products
- **Workforce vulnerability:** such as bonded visas, temporary migrants, women or children known to be employed in specific industry sectors

Classification

High Risk	Medium Risk	Low Risk
· Building and construction · Cleaning and Security · Events and event management · Facility management and property maintenance · Finance and Investment · Food and catering services · Furniture and office supplies · ICT Hardware · ICT Software and network services - offshore · Labour Hire · Linen, laundry and textile products · Medical devices and supplies · Transport, logistic and warehousing · Uniforms and PPE · Waste management services	· Advertising & Marketing · ICT Software and network services - onshore · Utilities · Fleet management, consumables and maintenance · Travel and accommodation · Print / Mail Provider	· Professional services · Financial expenses · Government and agency fees · License / membership fees

Note: The following categories are Not in Scope of the ACAN Category Risk Taxonomy

- Pastoral
- Payroll (excluding labour-hire and sub-contracting)

Supply Chain Risk

The table below identifies the supply chain categories that have the highest level of risk for Modern Slavery. Armidale Catholic Schools has active suppliers in these categories and is focused on working with the highest priority suppliers to more effectively manage and mitigate modern slavery risks.

Armidale Catholic Schools High Risk Spend Categories

Armidale Catholic Schools' High Risk Spend Categories for calendar year 2025 was \$28M with 845 suppliers from a total of 1919 suppliers.

Spend category	Sub-categories	Justification	Number of Suppliers	Spend
Building and construction	Building materials (e.g., concrete, steel, timber, plaster products, glass, plastics, quarried stone, etc.), subcontracting and labour hire services, demolition, painting, and landscaping.	Numerous examples of forced labour associated with the production of building and construction materials commonly used in Australia and internationally have been documented. Labour hire and complex layers of subcontracting are characteristics of many Australian building sites. According to the US Department of Labour, forced labour and child labour is used in the production of many construction materials such as timber from Cambodia, Vietnam, Brazil, Peru, India and Russia.	73	\$21M
Cleaning and security services	Sub-contracting and labour hire services, chemicals and cleaning products, security equipment (radios, torches, pouches, bags etc) PPE, uniforms and footwear.	The cleaning and security sectors typically employ low skilled (often migrant) workers who face significant language barriers and a lack of understanding of their rights. Opaque sub-contracting arrangements are also common. Training is limited even in the security sector which has been under scrutiny for several years about rorting of interstate licensing systems and associations with criminal enterprises. Jobs in this sector are low paid (often cash in hand), have high rates of staff turnover, with staff often moved between multiple worksites. Equipment and consumables used in these sectors are largely manufactured overseas, predominantly in high-risk countries such as China and Vietnam.	45	\$1.7M
Events and event management	Promotional products, venues, bar and table wait staff, catering, cleaning and security, vending equipment, tableware, crockery, bar and food service equipment,	High risk of modern slavery is present in three key areas: venues; related goods and services (including food, tableware, furniture, etc); and the labour force. Venues such as hotels, conference centres, restaurants, and clubs are at high risk of modern slavery due to the use of short-term labour hire, on-site catering, cleaning and security services.	62	\$0.41 M

Spend category	Sub-categories	Justification	Number of Suppliers	Spend
	vending machines, table and room decorations and all associated consumables.	Goods such as promotional products (pens, pads, event bags, branded novelty items), food and beverage, tableware and other venue or event consumables (floral products) are high risk due to their country of origin and or sourcing of raw materials. Exploitation of event and venue staff (particularly through labour hire companies) such as bar staff, table servers, and kitchen hands, is endemic in the hospitality and catering sector. The use of temporary migrants, international students, travellers and other low-skilled or short-term labour is widespread.		
Facility management and property maintenance	Hard and soft services including minor repairs, plumbing and septic, utilities management, building operations, HVAC, landscaping and yard work, removalists, cleaning and janitorial, security and patrols	The labour force used in facilities management generally consists of low skilled, low paid and temporary workers often contracted through labour hire companies. Workers are often temporary migrants who face language barriers and a lack of understanding of Australian workplace law and their rights.	256	\$2.8M
Finance & Investment	Investment funds, private equity and hedge funds, banks, financial services providers, insurers, credit and bond rating agencies	Investors' exposure to modern slavery risks will continue to grow in an era of increasingly complex global supply chains, the prevalence of imports from countries with poor human rights track records, and the reliance on base-skilled workers across product and service procurement in Australia and overseas. Bankers, investors, insurers, financial partners and financial sector actors have unparalleled influence over global business and entrepreneurialism. They have a unique role to play in investing in and fostering business practices that help to end modern slavery and human trafficking. Finance is a lever by which the entire global economy can be moved.	6	\$3.3M
Food and catering services	Food and groceries (meat, seafood, fresh, dried, processed, pre-packaged, bakery products and general groceries, dairy, fruit and vegetables), wine grapes, beverages, general catering for conferences, launches, events etc and hospitality services.	The agricultural industry often relies on complex labour hire services, employing large numbers of seasonal workers and vulnerable migrant workers. This leads to a high potential for deceptive recruitment, human trafficking and debt bondage, as well as the use of excessive deductions and 'cashback payments' to employers, recruiters and agents. Hospitality workers are among the highest risk for forced overtime, underpayment and workplace harassment. Exploitation of migrant workers, international students and young, vulnerable workers	118	\$0.8M

Spend category	Sub-categories	Justification	Number of Suppliers	Spend
		has been widely documented. Poor working conditions experienced by workers in this sector were recently highlighted through the exposure of systemic underpayments of wages by restaurant groups. Some states in Australia have adopted labour-hire licensing to regulate and monitor labour-hire contractors. Labour-hire in agriculture is a precarious and casualised type of work where vulnerability is high. Workers do not have direct relationships with employers, regular employment or job security.		
Furniture and office supplies	General office suppliers, stationery, paper products, small office machines, (not computers or peripherals), labels, ink, toner, furniture (chairs, tables, workstations, filing cabinets, shelves, racks etc), workplace suppliers (cleaning, first aid, bathroom etc), packaging, boxes etc	Large quantities of office supplies and furniture are imported into Australia from high-risk countries such as China, Vietnam and Indonesia. Products are also produced in industry sectors that are high risk of modern slavery such as manufacturing, forestry, metal and plastic production and printing. The US Department of Labor has identified several office supplies at risk of being produced by child or forced labour in Malaysia and China. In 2019 Wesfarmers identified a high risk of modern slavery associated with Officeworks products made in China. Risk included excessive overtime and lack of freedom of association.	172	\$1.9M
ICT Hardware		According to the 2018 Global Slavery Index, electronics are the highest risk product for modern slavery in supply chains. The report also highlights that the most at-risk electronics imported to Australia are from China and Malaysia. Forms of modern slavery identified by the GSI and other reports as being present in the electronics sector include passport retention or doctoring of identity documents, restriction of freedom of movement, poor living conditions, underpayment, fines and illegal salary deductions, excessive working hours and unpaid overtime.	17	\$3.1M
Labour Hire	Wide range of traditional low-skilled / low paid work.	Labour hire services pose a high risk for worker exploitation and modern slavery for several reasons, including: • focus on low-skilled, low-paid, seasonal, temporary and or intermittent labour • recruitment of potentially vulnerable people such as new migrants, temporary work visa holders, international students and undocumented	7	\$0.96 M

Spend category	Sub-categories	Justification	Number of Suppliers	Spend
		workers • deceptive and opaque practices trapping workers into exploitative situations or modern slavery • demanding excessive fees for visas, documentation, travel arrangements, etc creating a debt trap and situations of bonded labour • coercive control, threats, withholding workers' identity documents to limit their freedom of movement and social isolation from community or other supports is common practice		
Linen, laundry and textile products	Curtains, towels, carpets, flannels, laundry services including plant and equipment, chemicals, maintenance, transport and logistics.	The textiles and apparel industry poses very high risks of modern slavery, particularly forced labour, child labour and human trafficking. According to the Global Slavery Index 2018, garments are the second highest-risk product for modern slavery in supply chains. The 2018 Know the Chain Report found that 65% of companies in the apparel and footwear sector scored below 50% in addressing risk of forced labour in supply chains. People working in linen and laundry services are also at high risk of modern slavery practices due to low pay rates and use of low-skilled labour and subcontracting arrangements. Workers are also at high risk of exposure to toxic chemicals and pathogens.	21	\$0.22M
Medical devices and supplies	Machines, instruments, beds and health furniture, PPE, uniforms, gowns, gloves, masks, syringes, wound dressings etc	Modern slavery has been linked to all stages of the production of medical devices including: • mining, refining and production of raw materials such as steel, tantalum, plastic, latex, cotton, synthetic fibres, chemicals, glass etc; • manufacturing of the product or components; • transport and logistics operations; and • management of waste and toxic waste materials. Examples of modern slavery practices in medical supply chains include, inadequate pay, forced overtime, excessive recruitment fees, confiscation of passports, anti-union and anti-human rights activities, poor safety, below-standard accommodation, physical and mental abuse, and forced and child labour.	21	\$0.32M

Spend category	Sub-categories	Justification	Number of Suppliers	Spend
Uniforms and PPE	Uniforms (workwear, school wear, sportswear), footwear and PPE (e.g. gloves, face masks or respirators, glasses / goggles, ear muffs, safety workwear etc)	The textiles industry is high risk for modern slavery, particularly forced labour, child labour and human trafficking. According to the Global Slavery Index 2018, garments are the second highest risk product for use of modern slavery in supply chains. The 2018 Know the Chain Report found that 65% of companies in the apparel and footwear sector scored below 50% in addressing risk of forced labour in supply chains. Apparel factory workers are also at high risk of forced overtime, often unpaid, particularly in countries such as Vietnam, Bangladesh and Honduras. Use of complex subcontracting in supply chains heightens these and other risk factors.	31	\$0.56M
Waste management services	Recycling, processing, transport, hazardous waste, special waste streams, PPE, vehicles, bin manufacturing	The waste industry (including recycling) is a dangerous sector for workers with significant WHS risk such as exposure to toxic materials and pathogens, use of heavy machinery and dirty work environment. Modern slavery risks are similar to those faced by cleaners. Sub-contracting to small waste management companies is common across the sector as is the use of labour hire. Migrants and low-skilled workers are used in waste collection, handling and material recovery facilities.	16	\$0.18M

Reporting Criteria 4: Actions taken to assess and address risk

ACAN Supplier Engagement

The ACAN Program provides supplier engagement support and data, enabling a systematic and comprehensive supply chain risk assessment. In 2025 the ACAN Modern Slavery Risk Management Program launched a new purpose-built data management platform - ROTA. ROTA centralises the ACAN Risk Management Program framework and facilitates supplier performance evaluation and engagement. ROTA enables the following:

1. Evaluation of the modern slavery risk within operations and supply chains, using the ACAN Risk Taxonomy
2. ACAN Supplier Survey to identify supplier revenue, number of employees, countries of origin for goods sourced overseas, workforce contractual arrangements and Sedex membership status.
3. Supplier education on modern slavery and risk management in key areas: cleaning, building and construction, procurement of labour, labour hire and services, sourcing goods from overseas, grievance mechanisms and remediation
4. Onboarding suppliers to Sedex requires a business address, contact details and goods or services provided
5. Sedex Self-Assessment Questionnaire (SAQ) helps suppliers to evaluate their practices against established standards and identify areas for improvement
6. Desktop review to identify key actions required from suppliers
7. Enhance supplier screening using Know Your Client (KYC) intelligence software
8. Corporate Social Compliance Audits provide a point in time, objective and independent verification process of supplier alignment with local laws and worker wellbeing standards
9. Domus 8.7 Index modern slavery statement assessment on selected suppliers in high-risk categories
10. ACAN Prequalified Supplier Directory - a list of preferred suppliers accessible to Catholic organisations



Domus 8.7

Armidale Catholic Schools is a founding member of Domus 8.7. Domus 8.7 was established as an agency of the Catholic Archdiocese of Sydney in 2020 as a key element of the ACAN Modern Slavery Risk Management Program. This collaborative approach to remediation is aligned with the Modern Slavery Act and Catholic Social Teaching which are centered on the needs, wellbeing and empowerment of people impacted.

Domus 8.7 provides Armidale Catholic Schools with:

- resources that enable us to listen to workers (grievance channel)
- a 24/7 careline for workers on our sites, staffed by professional counsellors
- direct support to people impacted by modern slavery
- guidance and technical assistance to prevent, identify and remediate modern slavery
- a documented process to assess if an organisation has caused, contributed or is directly linked to modern slavery and modern slavery indicators

Domus 8.7 empowers people impacted by modern slavery to have choice and control over what forms of remediation are meaningful to them and to engage safely with business and supply chain actors. Supports may include:

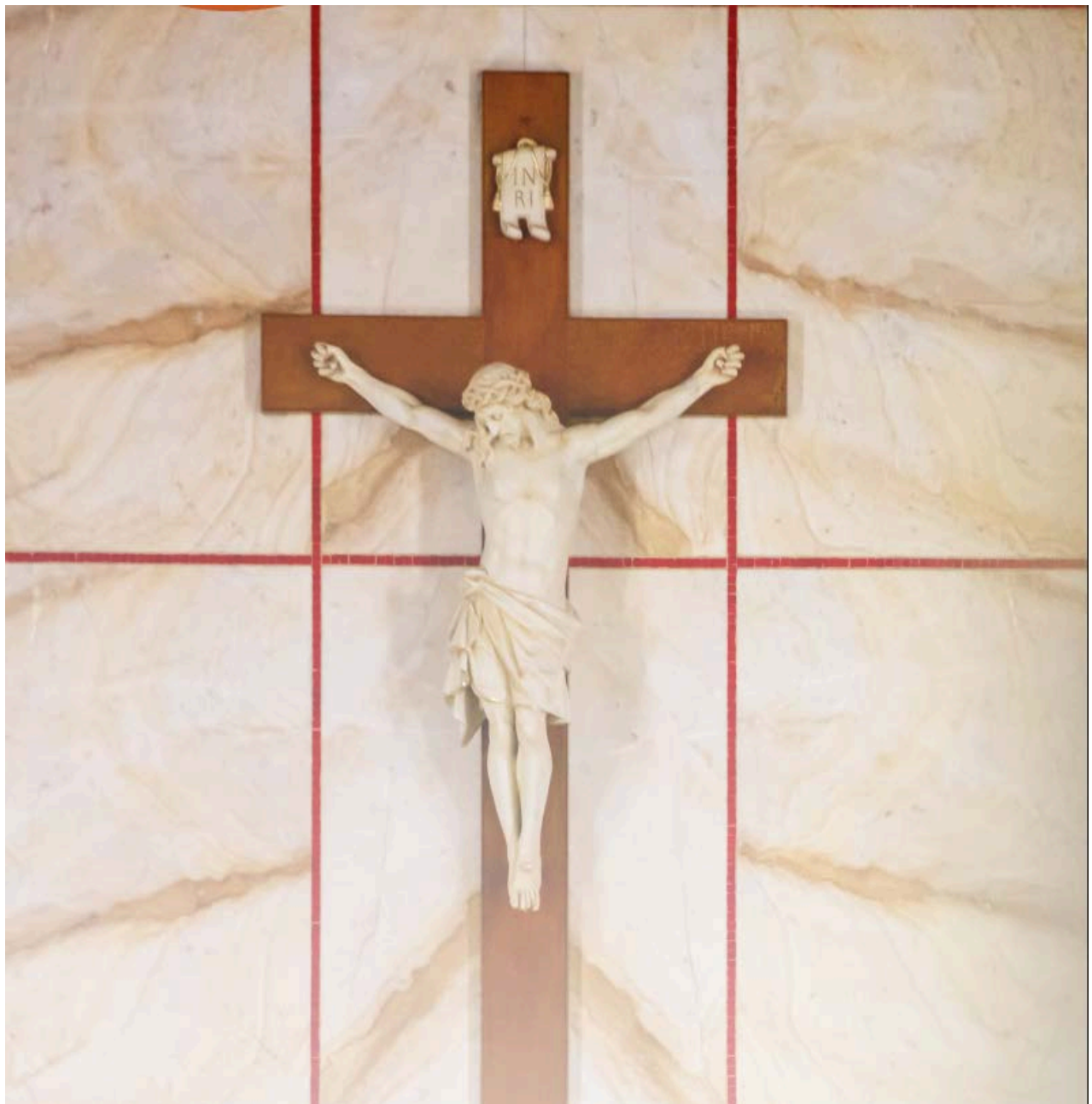
- modern slavery indicator assessment
- needs assessment, case coordination, response and remediation planning
- referrals to community, social services, unions
- transport, accommodation, financial and food support
- legal support, referrals, accompaniment and advocacy
- job training, retraining and redeployment
- accompaniment and advocacy to engage with government and law enforcement agencies
- opportunities to contribute lived expertise to improve modern slavery responses

The Domus 8.7 Advisory Committee Members includes a person with lived experience, Mr Moe Turaga. Domus 8.7 is a registered charity with the Australian Charities and Not-for profits Commission (ACNC) and is an endorsed Public Benevolent Institution with Deducible Gift Recipient (DGR) status, ABN 244 72497189.

Remediation

Armidale Catholic Schools intends to provide appropriate and timely remedy to people impacted by modern slavery in accordance with the United Nations Guiding Principles on Business and Human Rights, the Australian Modern Slavery Act 2018 (Cth) – Guidance for Reporting Entities and other relevant Australian laws.

The remedy includes providing for, or co-operating in, actions to address harms to people and to address future risks if Armidale Catholic Schools is found to have caused or contributed to modern slavery. Due to the complexity of remediation, Armidale Catholic Schools will need to source specialist resources that ensure the best outcomes for people impacted by modern slavery. To this end, Archbishop Fisher established [Domus 8.7](#) to provide a remedy to people impacted by modern slavery.



Our Organisation

Our staff allocation is as follows:

Male 201

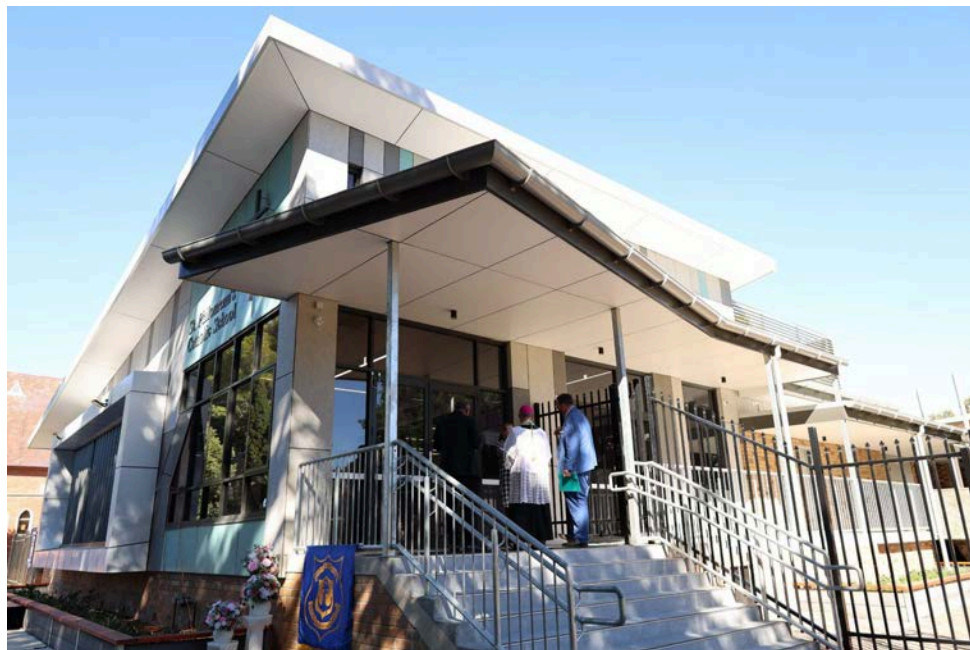
Female 944

Total 1,145

We have 24 schools with a total student population of 6,144.

Armidale Catholic Schools complies with the Fair Work Act employment awards and collective agreements with the directly employed workforce through a variety of HR policies and procedures, including:

- Employment contracts
- Code of Conduct
- Employee Leave Policy
- Flexible Working Arrangements
- Harassment, Bullying and Discrimination Policy
- Acceptable Use of Electronic Communication Systems and Devices
- Child Protection/Safeguarding Policy
- Complaints Management Framework/Policy
- Performance Management Policy; Privacy and Confidentiality Policy
- WHS Framework/Policies
- Whistle-blower Policy



St Philomena's Moree

Reporting Criteria 5: Effectiveness Assessment

Continuous improvement

Collaboration is at the heart of accelerating progress. This also includes opportunities to comparatively measure social, environmental and governance (business ethics) risks and actions with peers in our network.

In its foundational stages, Armidale Catholic Schools used an internally devised ACAN framework to measure progress. This bespoke approach reflected the unique priorities, constraints, and practices across Catholic organisations.

In 2025, the ACAN Program adopted a globally recognised risk measurement system through SEDEX. This aligns reporting entities with a methodology that combines global data about risks in different countries and industries with site-specific information from the SEDEX platform. SEDEX regularly updates the methodology to ensure it is aligned with new and emerging risks. Therefore, completion of the SEDEX SAQ completed by Armidale Catholic Schools is a substantial measure of continuous improvement year on year. Below is an explanation of how scoring is calculated using the SEDEX SAQ and Armidale Catholic Schools 2025 risk scores and management controls that will serve as our benchmark for continuous improvement.

Explanation of Scoring

Combined Risk Score 0/10 - calculated from inherent risk and site characteristics, adjusted for management controls and audit results. The score is broken down by pillar and highlights strengths and opportunities to focus our efforts on key areas that drive ethical and sustainable practices.

Inherent Risk Score 0/10 - predicts potential risks based on a country/region and sector. Spanning all four pillars, this score is broken down by topics. It can be used as a baseline to identify and prioritise areas for improvement in operations. This score shows the natural risks of doing business in a specific country or sector. It does not include any details about individual sites.

Labour Standards Pillar - assesses location and industry factors that could increase labour risks, such as vulnerable worker populations or high rates of workplace violations.

Health and Safety Pillar - considers regional and industry-specific health and safety risks, including local regulations and industry accident rates.

Business Ethics Pillar - assesses industry and location risks related to unethical practices, such as high corruption levels or weak regulatory oversight.

Environment Pillar - examines the environmental impact of the site's industry and location, such as pollution levels or resource use that may create regulatory or compliance risks.

Site Characteristics Risk Score 0/10

Highlights potential risks based on the suppliers' SAQ responses in the Labour Standards and Health and Safety pillars. This score can be used to assess and support the implementation of policies and processes

that mitigate workplace risks within the supply chain

Labour standards - reflects labour-related risks like employment practices, workers rights and wages based on SAQ responses. High-risk activities in this area can raise the score.

Health and Safety - based on SAQ responses to questions about site-specific health and safety factors, such as equipment usage, handling of chemicals or accident risks.

Risk score summary

View a detailed breakdown of site risk scores and management controls and information on how they are calculated. [Learn more about risk scores](#)

Company name
Armidale Catholic Schools
ZC number: ZC5000051397

Site name
Armidale Catholic Schools
ZS number: ZS1000091427

Combined risk score

3.3/10

Low risk

Score breakdown by pillar

Highlight strengths and opportunities to help businesses focus their efforts on key areas that drive ethical and sustainable practices.

Inherent risk

2.9/10 (Low risk)

Labour standards

2.9/10

Health and safety

2.2/10

Business ethics

1.8/10

Environment

3.3/10

Site characteristics risk

3.6/10 (Low risk)

Labour standards

4.2/10

Health and safety

2/10

Page | 26

Management Controls Score 0/5

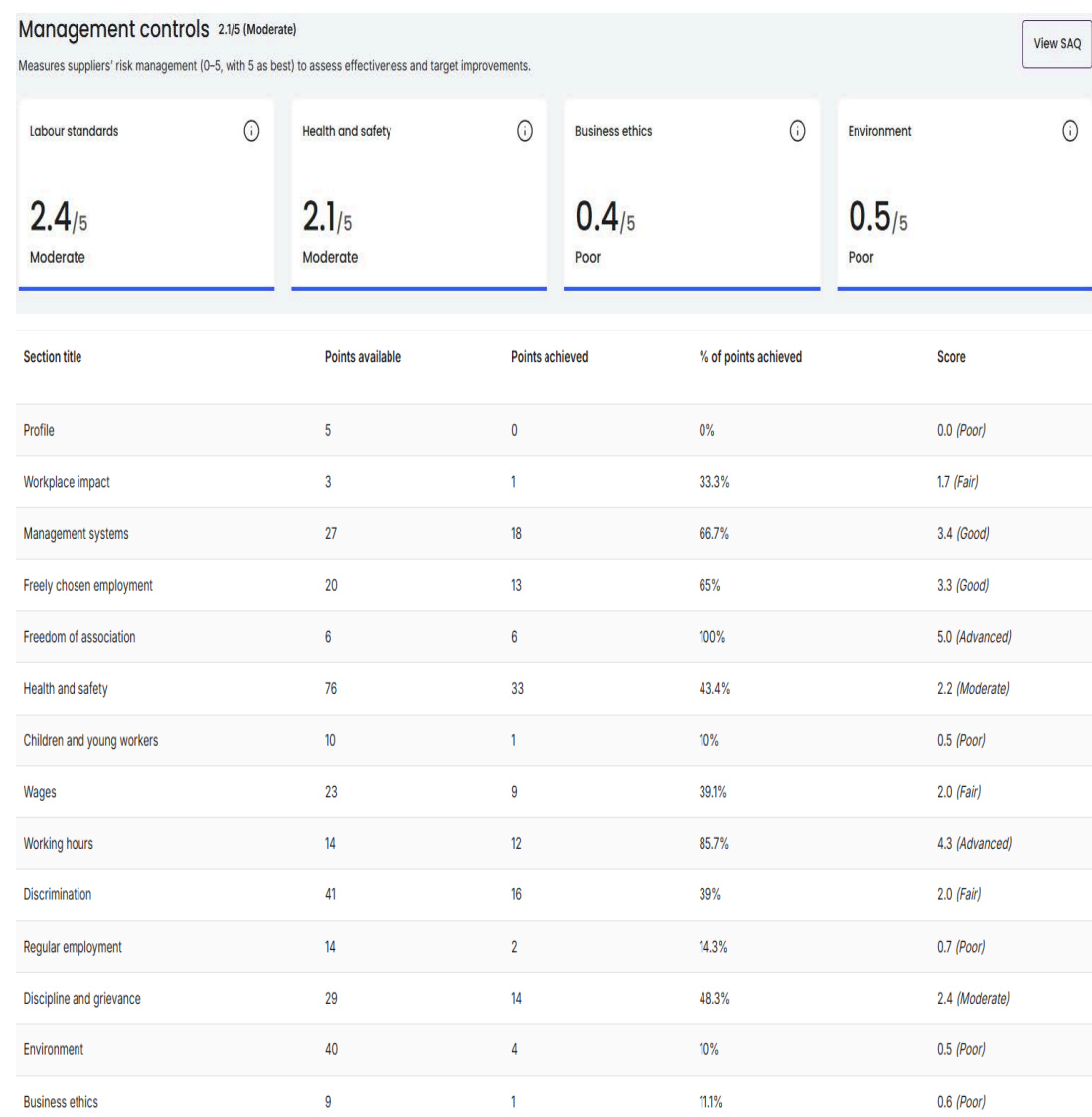
This score measures how well policies or processes are in place to reduce the risks from the site characteristics. It is also based on answers in the SAQ. A Poor score of 0-0.9 indicates that there are few or no controls in place. An Advanced score of 4-5 indicates that there are exemplary controls that exceed compliance and drive innovation.

Labour standards - evaluates policies and processes to ensure fair labour standards and worker protections are effectively managed.

Health and Safety - reviews the adequacy of safety protocols, emergency preparedness and training efforts to manage health and safety risks on site.

Business Ethics - evaluates controls against unethical practices such as anti-bribery policies, compliance with legal standards and transparent operations.

Environment - looks at policies managing environmental impact, resource efficiency and waste reduction practices to align with sustainability standards.



SEDEX Supplier Engagement compiled for Armidale Catholic Schools

Supplier Engagement Overview

ACAN Entity File
ENTR-1 | Armidale Catholic Schools

Total suppliers

1,741

Suppliers in High Risk procurement categories

845

ACAN Supplier Surveys completed

597

ACAN Supplier Surveys completed in 2025

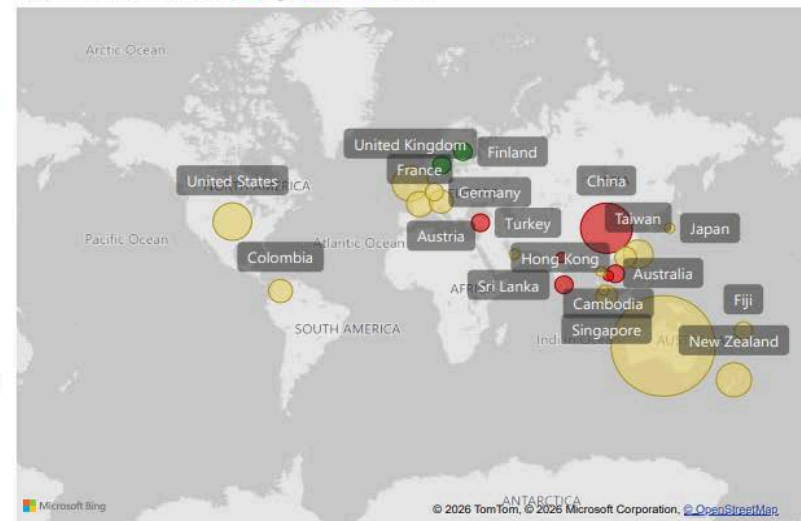
170

Suppliers identified for Sedex Onboarding

52

Sourcing Countries for Tier 1 Suppliers

Overall inherent risk cate... ● high ● low ● medium



Supplier e-mail shared

1694

Supplier Communication

3828

Suppliers completing e-learning

25

Supplier Screening - ACAN Collated

Enhanced 3rd Party Supplier Screening

529

3rd Party Supplier Screening - High and Medium Risk

25

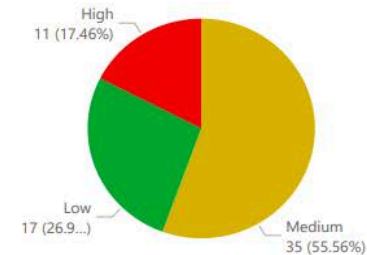
Suppliers on Sedex

54

SAQs Completed

55

Sedex SAQ Risk Category



Audits in 2025

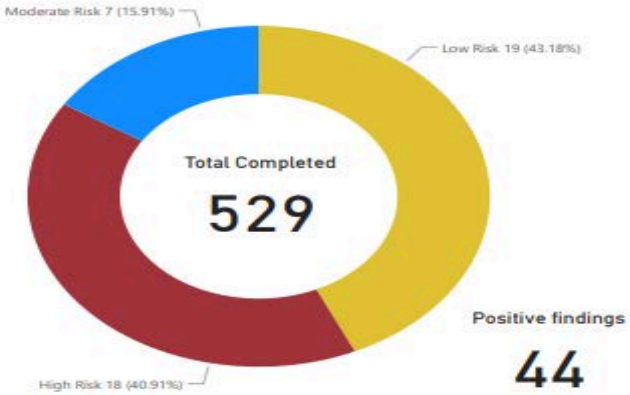
12

Audits Findings in 2025

80

SEDEX Supplier Screening compiled for Armidale Catholic Schools

Count of Key by Screening - Risk

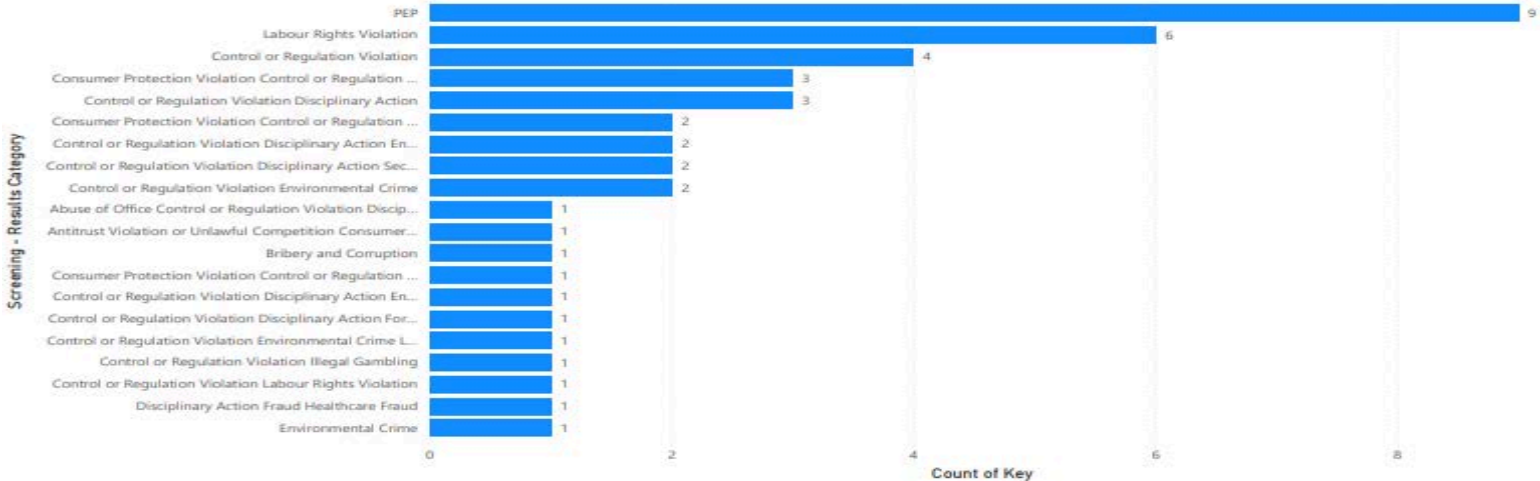


Supplier Screening - ACAN Collated

Please note this are all checks completed in 2025 and this have not been filtered by suppliers to your organisation.

Screening - Results Category	Count of Key
PEP	9
Labour Rights Violation	6
Control or Regulation Violation	1
Disciplinary Action	
Environmental Crime	
Labour Rights Violation	
Control or Regulation Violation	1
Environmental Crime	
Labour Rights Violation	
Control or Regulation Violation	1
Labour Rights Violation	
Total	18

Count of Key by Screening - Results Category



The ACAN baseline data table provides a comparative measure of supplier engagement and program activities to measure progress and inform future action planning.

	ACTIVITY	2024	2025
INTERNAL / STAFF	Hours spent on modern slavery activities	26	54
	Individual staff completed e-learning	0	4
	E-learning modules completed	0	8
EXTERNAL / SUPPLIER ENGAGEMENT	Total number of suppliers	1919	1741
	Number of suppliers across high-risk categories	867	845
	Number of ACAN Supplier Surveys completed (identified through ABN & data matching)	259	597
	Supplier staff attending capacity-building webinars	42	25
	Invited to join Sedex	40	52
	Joined Sedex	57	54
	Sedex SAQ completed	76	55
	Social audits	17	12
	Corrective actions	75	80
DOMUS 8.7 EXTERNAL REFERRALS	Contacts made via the worker voice/grievance mechanism	0	71
	Referrals for advice and assistance	0	1
	Individuals identified or referred for modern slavery assessment	0	0
	Individuals with modern slavery cases remediated	0	0

Action Plan 2025-26

Modern Slavery Action Plan 2025-2026

Position or Operational Area	Outcomes	2025 Actions	2026 Actions
Board of Directors	Leadership and effective governance of modern slavery risks to people in supply chains and operations are effectively demonstrated, managed and reported	Board Approves and Board Chair signs annual Modern Slavery Statement at June Board meeting Review modern slavery progress at the October Board meeting 100% Board members complete modern slavery e-learning course modules: MS101, Business Relevance, Implementing a MS Risk Management Program, Grievance Mechanisms and Remedy 1.5 hours self-paced	Board Approves and Board Chair signs annual Modern Slavery Statement at June Board meeting Review modern slavery progress at the October Board meeting
Director of Schools	Modern slavery risks to people in supply chains and operations are addressed through effective management systems	Present the annual Modern Slavery Statement to the Board for approval and signature	Present the annual Modern Slavery Statement to the Board for approval and signature
Head of Finance, Facilities & ICT	Financial/economic impacts of modern slavery risks to people in operations and supply chains are effectively managed Modern slavery risk management program allocated adequate resources	Monitor Modern Slavery Working Group (MSWG) Review and establish internal modern slavery reporting and budget requirements Modern slavery risk review of investments	Monitor Modern Slavery Working Group (MSWG) Review and establish internal modern slavery reporting and budget requirements Modern slavery risk review of investments

Position or Operational Area	Outcomes	2025 Actions	2026 Actions
Head of Employee Services	Direct workforce can evidence the skills, knowledge and attitude to effectively address risks of modern slavery in operations and supply chains aligned with the public commitment The entity has effective processes to provide a remedy that is transparent, credible and accountable	Strategy for e-learning roll-out developed and implemented Accountabilities for modern slavery are integrated into new and existing position descriptions Modern slavery training and awareness are incorporated into recruitment and induction processes Complete workforce profile mapping Provide performance reviews/management of modern slavery accountabilities Staff awareness survey	An effective grievance mechanism is deployed and monitored in operations so stakeholders can raise modern slavery concerns Continue to monitor and measure e-learning roll-out Provide performance reviews/management of modern slavery accountabilities Monitor changes in the workforce profile Worker voice and well-being surveys
Procurement	Robust systems are in place to effectively identify and mitigate modern slavery risks in the supply chain Regular risk assessment Policy development and implementation Supplier engagement and training Monitoring and Auditing Remediation and support Reporting and transparency Continuous improvement Collaboration and partnerships	Adjust and incorporate 2024 learnings into the risk identification framework Desktop review of min. 36 high-risk suppliers Plan for Supplier Audit program (high risk suppliers identified after review) Initiate pilot Audit program (social audit/human rights due diligence) for 5 suppliers identified through risk review activities Communicate with suppliers regularly about values, expectations, and outcomes. Include invitations to trainings and drive high risk suppliers to join the pre-screening platform (as agreed/ recommended by the Modern Slavery Working group/ACAN in 2024). Define required mitigating actions for	Adjust and incorporate 2025 learnings into the risk identification framework. Desktop review of min. 72 High risk suppliers through the year 12 randomly selected low and medium risk suppliers Engage deeper with 5 select suppliers, to build capacity and demonstrate best practice Expand the Audit program (social audit /human rights due diligence) to suppliers identified through risk review activities Communicate with suppliers regularly about values, expectations, and outcomes. Include invitations to trainings and drive high risk suppliers to join the pre-screening platform (as agreed/ recommended by the Modern Slavery Working group/ACAN in 2024).

Position or Operational Area	Outcomes	2025 Actions	2026 Actions
		non-compliances and timelines for completion, in collaboration with the MS Working Group and apply these when issues arise Refine measures and reporting on the actions	Monitor that required mitigating actions for non-compliances and timelines for completion are maintained, in collaboration with the MS Working Group Refine measures and reporting on the actions. Establish supplier due diligence checks and monitor supplier corrective action plans, audits or other reviews
Risk Manager	Modern slavery risk assessment criteria have been developed and are continuously monitored and reviewed	Participate in MSWG Continuous updating of the corporate modern slavery risk management profile Undertake ongoing scan and assessment of emerging modern slavery risks	Participate in MSWG Regular monitoring of risk
Employee Services	Modern slavery risk is effectively managed in relation to legal requirements	Participate in MSWG Ensure a legally compliant Modern Slavery Statement, policies and documents Provide advice to the Modern Slavery Working Group where relevant Review and monitor the usage of modern slavery clauses in contracts Monitor and advise on legislative requirements relating to modern slavery	Participate in MSWG Provide advice to the Modern Slavery Working Group where relevant Review and monitor the usage of modern slavery clauses in contracts Monitor and advise on legislative requirements relating to modern slavery Conduct legal and governance review of policies and documents regarding modern slavery

Position or Operational Area	Outcomes	2025 Actions	2026 Actions
		Conduct legal and governance review of policies and documents regarding modern slavery	
Communications & Engagement	Management of modern slavery risks to people in operations and the supply chain is effectively and actively communicated to stakeholders Communications demonstrate respect for the rights of people impacted by modern slavery	Participate in MSWG Complete modern slavery e-learning course Annual modern slavery communications strategy developed and implemented* Update and monitor the intranet page Expand content on the modern slavery web page, e.g. supplier information. Support the branding and graphic design of the Modern Slavery Statement Monitor ACAN communications and share as appropriate	Participate in MSWG Annual modern slavery communications strategy developed and implemented Update and monitor the intranet page Update the modern slavery web page Support branding and graphic design of the Modern Slavery Statement
Finance	The risk of modern slavery in investments is effectively managed, monitored and reported		Participate in MSWG meetings Ensure investment staff receive training on responsible investments and modern slavery Strengthen responsible investment policies by explicitly covering modern slavery Enhance disclosure on modern slavery and how this risk is managed in investments Review Investment Management Agreements (IMAs) for exposure to modern slavery risks

Position or Operational Area	Outcomes	2025 Actions	2026 Actions
Modern Slavery Working Group (MSWG)	Modern slavery risk management is effectively managed by a cross-functional team within the organisation	Review and Monitor Terms of Reference Action plan monitoring and review Complete an entity profile survey to obtain a maturity assessment Contribute to drafting and finalisation of the annual Modern Slavery Statement Provide progress reports to the Board	Review and Monitor Terms of Reference Action plan monitoring and review Complete an entity profile survey to obtain a maturity assessment Contribute to drafting and finalisation of the annual Modern Slavery Statement Provide progress reports to the Board
Modern Slavery Liaison Officer (MSLO)	Modern Slavery Risk Management is embedded across the entity's operations and supply chains	Administer, coordinate and monitor MSWG Terms of Reference Represent the entity to the Australian Catholic Anti-Slavery Network (ACAN) according to the Catholic Archdiocese of Sydney's ACAN Terms of Reference Complete ACAN Entity Profile survey Coordinate drafting of the annual Modern Slavery Statement by MSWG members Finalise Modern Slavery Statement for approval and signature by the Board/Bishop Provide the final Modern Slavery Statement to ACAN for inclusion in the ACAN Compendium	Administer, coordinate and monitor MSWG Terms of Reference Represent the entity to the Australian Catholic Anti-Slavery Network (ACAN) according to the Catholic Archdiocese of Sydney's ACAN Terms of Reference Complete ACAN Entity Profile survey Coordinate drafting of the annual Modern Slavery Statement by MSWG members Finalise Modern Slavery Statement for approval and signature by the Board/Bishop Provide the final Modern Slavery Statement to ACAN for inclusion in the ACAN Compendium

Reporting Criteria 6: Internal Consultation

Armidale Catholic Schools established a Modern Slavery Working group in 2025. It will meet on a regular basis going forward to prompt awareness of Modern Slavery and to ensure that the obligations of Armidale Catholic Schools have been identified and captured in action plans and are regularly addressed.

Armidale Catholic Schools does not have any controlled entities.



Reporting Criteria 7: Any other relevant information

As part of the weekly Prayer program at Armidale Catholic Schools, the Feast of St Josephine Bakhita was recognised in our office. St Josephine Bakhita was a symbol of resilience in the fight against modern slavery and human trafficking.

St Josephine (1869-1947) had been born into a wealthy family in Darfur, in the village of Olgossa, west of Nyala – the fourth largest city in Sudan. Despite these beginnings, she was kidnapped as a young child and sold into brutal and abusive slavery many times.

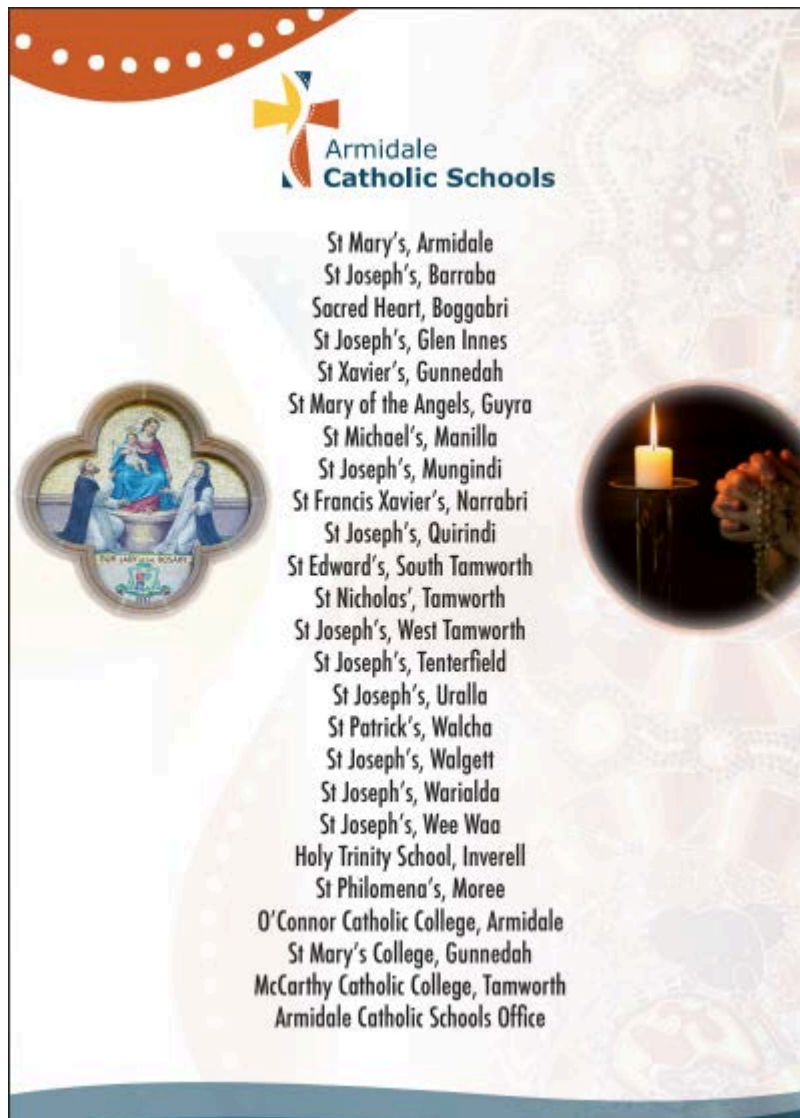
She eventually gained her freedom and joining the Canossian Sisters, but sadly, she had spent so much time in captivity that she had forgotten her original name. It was her slave owners who gave her the moniker “Bakhita”, which means “fortunate” in Arabic.

St Josephine Bakhita was canonised on 1 October 2000 by Pope St John Paul II. Her feast day is celebrated each year on 8 February. She is commemorated as the patron saint of South Sudan and Sudan, and of the victims of modern slavery and human trafficking.



APPENDIX 1

Armidale Catholic Schools comprises the following 24 schools:



Modern Slavery Statement



2025

*O God, who made Saint Peter Claver a slave of slaves
and strengthened him with wonderful charity and patience
as he came to their help,
grant, through his intercession,
that, seeking the things of Jesus Christ,
we may love our neighbour in deeds and in truth.
Through our Lord Jesus Christ, your Son,
who lives and reigns with you in the unity of the Holy Spirit,
one God, for ever and ever.*

Catholic Schools NSW Limited (CSNSW)
ABN 46 619 593 369
and its wholly owned subsidiary
Catholic Employment Relations Ltd (CERL)
ABN 37 643 423 885

Artwork on next page: Reconciliation of the 11 Catholic Dioceses within NSW

Artist: Lewis Hennessy

Year: October, 2017

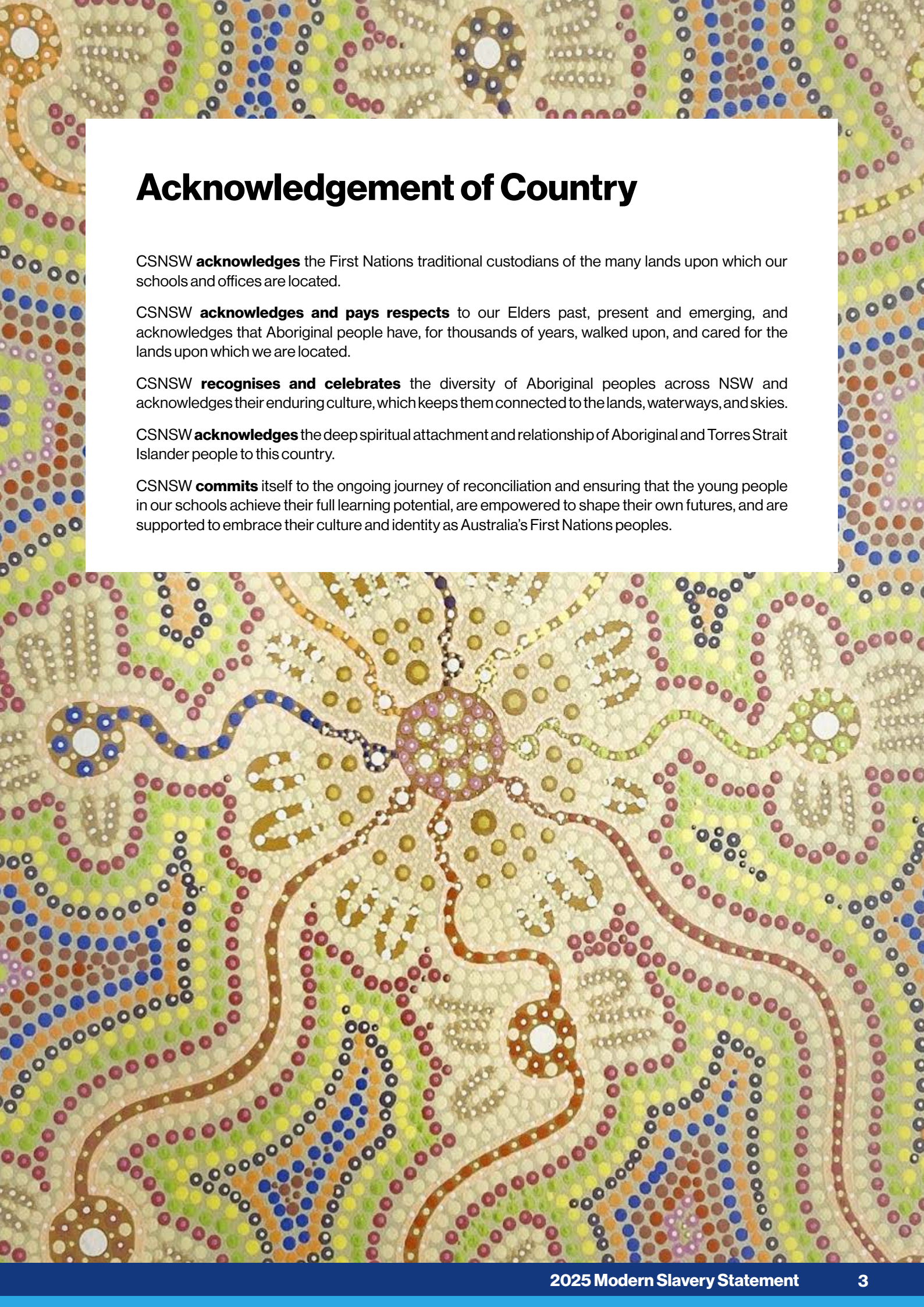
Medium: Acrylic on Canvas.

Dimension: 16X20

Country/Mob: Bundjalung – North-Eastern, New South Wales

A campfire/yarning circle that is based in the centre of the painting represents Aboriginal communities. This is where the knowledge is shared and stories are learned, respect is taught, responsibility is told and culture is grown. The second outer circle represents Aboriginal peoples and communities that hold and share the knowledge and respect that is passed along. The outer 11 Circles represent the 11 Catholic Dioceses and their journey to the campfire to learn knowledge, building relationships, respect, understanding of culture and connections to communities. Reciprocity is formed between communities and Catholic Dioceses working together for reconciliation within all communities.





Acknowledgement of Country

CSNSW **acknowledges** the First Nations traditional custodians of the many lands upon which our schools and offices are located.

CSNSW **acknowledges and pays respects** to our Elders past, present and emerging, and acknowledges that Aboriginal people have, for thousands of years, walked upon, and cared for the lands upon which we are located.

CSNSW **recognises and celebrates** the diversity of Aboriginal peoples across NSW and acknowledges their enduring culture, which keeps them connected to the lands, waterways, and skies.

CSNSW **acknowledges** the deep spiritual attachment and relationship of Aboriginal and Torres Strait Islander people to this country.

CSNSW **commits** itself to the ongoing journey of reconciliation and ensuring that the young people in our schools achieve their full learning potential, are empowered to shape their own futures, and are supported to embrace their culture and identity as Australia's First Nations peoples.

Statement, Approval and Signature from the Interim Chair

CSNSW is an organisation grounded in service according to the teaching of Jesus Christ. Our commitment to service extends to all whom we encounter through our work, the students entrusted to our schools, the families we serve, the educators we support, and the wider community connected to Catholic education.

In 2025, CSNSW has continued to uphold this commitment through practical action and addressing modern slavery risks within our operations and supply chains.

Modern slavery represents a profound violation of human dignity. The Church teaches that “the seventh commandment forbids acts or enterprises that for any reason—selfish or ideological, commercial, or totalitarian—lead to the enslavement of human beings, to their being bought, sold and exchanged like merchandise, in disregard for their personal dignity.” This clear moral teaching underpins CSNSW’s rejection of exploitation in all its forms and guides our approach to responsible governance, ethical procurement, and due diligence.

In proclaiming the Jubilee of 2025, Pope Francis reminded the Church and the world that hope must be placed at the centre of our response to human suffering. This hope, he has said, “is born of love”—a love that calls us not only to compassion, but to responsibility. Hope demands action: to see injustice clearly, to challenge indifference, and to act decisively where exploitation persists.

Pope Benedict XVI’s reflection on St Josephine Bakhita offers a powerful witness in this regard. Enslaved from childhood and later freed, St Bakhita discovered a hope born of an encounter with Christ—a hope that redeemed her suffering and transformed her life. As Pope Benedict observed, this hope could not be kept to herself: it had to be shared. In educating, equipping, and supporting our staff and partners to recognise and address modern slavery risks, CSNSW continues this mission of transforming awareness into action and action into hope.

This 2025 Modern Slavery Statement reflects CSNSW’s ongoing commitment to continuous improvement. During the year, we have continued our due diligence processes, training and awareness initiatives, and further embedded modern slavery considerations into our governance and procurement frameworks. The establishment and active operation of the Modern Slavery Working Group has enhanced cross organisational oversight and thereby ensured that modern slavery risks remain visible, understood, and actively managed.

We recognise that modern slavery is a complex and global challenge that cannot be addressed by policy alone. Meaningful progress requires sustained attention, honest reflection, and a willingness to continually improve our practices.

CSNSW recommits itself to ensuring that our decisions, relationships, and operations reflect the hope we profess—a hope grounded in love, strengthened by justice, and directed toward the protection of the dignity of every human person.



Emeritus Professor Toni Downes



Principal Governing Body Approval

This Sixth Modern Slavery Statement was approved by the Board which is the principal governing body of CSNSW as defined by the *Modern Slavery Act 2018* (Cth) ('the Act') on 23 April 2026. This Modern Slavery Statement is signed by the Interim Chair as the responsible member of Catholic Schools NSW as defined by the Act.



The Spirit of the Lord is upon me, because he has anointed me to bring good news to the poor. He has sent me to proclaim release to the captives (Lk 4:18)



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Criteria 1: About Catholic Schools NSW

CSNSW is the peak body responsible for supporting Catholic Schools across New South Wales (NSW). Established in 2017 as a company limited by guarantee, the Company's Members comprise the eleven diocesan bishops across NSW.

Our purpose and mission

At its core, CSNSW exists to serve the mission of the Church and support Catholic education in advancing high quality learning and strong faith formation for every student.

CSNSW neither owns nor operates schools. Instead, it acts as a central coordinating and leadership body, working closely with diocesan school authorities and religious institute/ministerial PJP school authorities to support operational excellence, uphold regulatory obligations, and advance the mission of Catholic education in Australia.

Our values as enablers

CSNSW's values, **Integrity, Service, Accountability and Collegiality**, underpin all work combatting modern slavery from governance to supplier engagement and training.

These values are visible in **Figure A**.

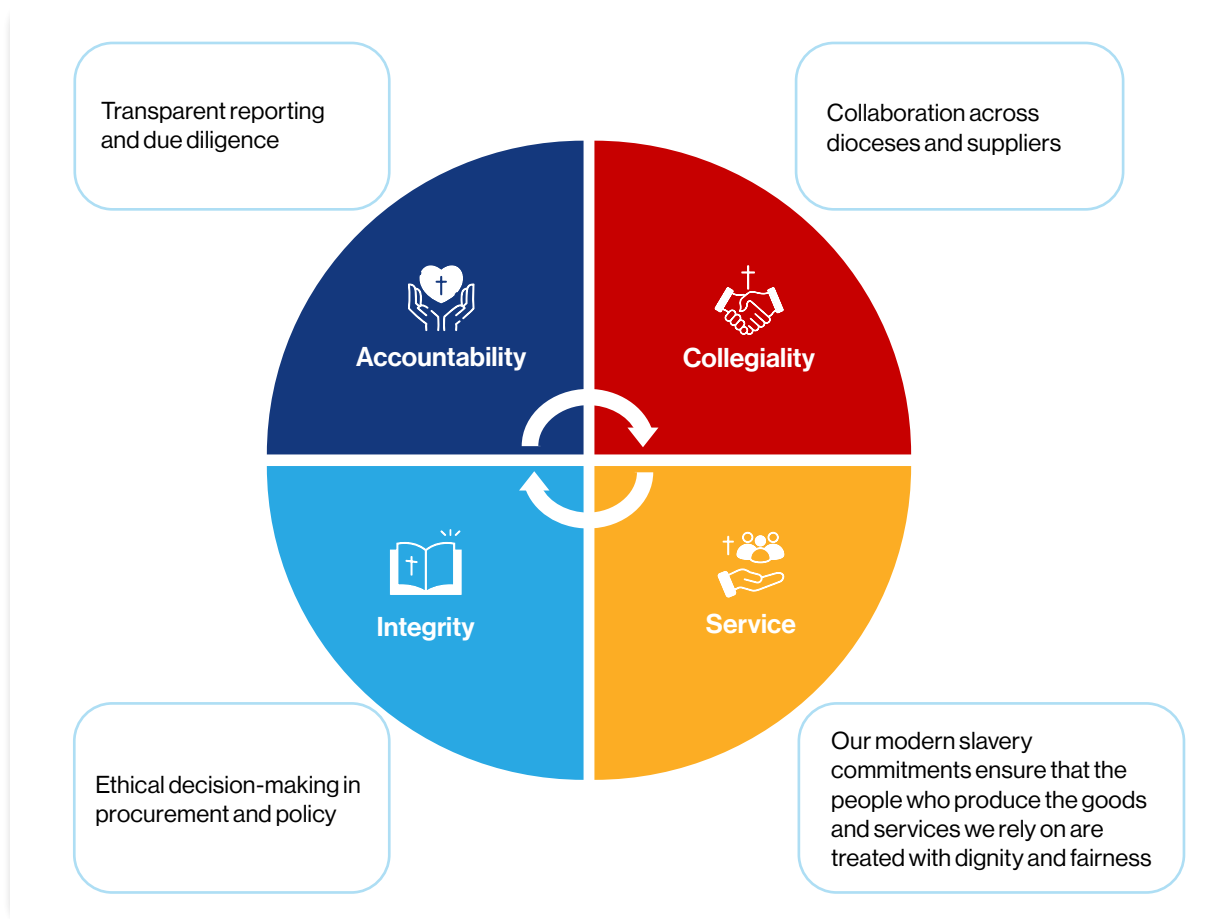


Figure A: CSNSW Values

CSNSW's Modern Slavery Program is one of the strongest operational expressions of these values. The actions carried out under the Program reflect CSNSW's mission to advance God's work through leadership and service, ensuring that CSNSW's influence extends beyond Catholic school communities to safeguard the rights and wellbeing of workers across the company's broader operations and supply chain.

These values shape the company's culture and reinforce its commitment to ethical practice, responsible stewardship, and respect for human dignity, including in the way the company manages the risks of modern slavery.

Our key roles and responsibilities

Guided by the Bishop Members, CSNSW carries responsibilities that position it as the primary interface between Catholic education and government across NSW. These include acting as:

- Approved System Authority for the distribution of over \$3 billion in recurrent government funding each year;
- Catholic Block Grant Authority (CBGA) for Commonwealth and NSW capital funding;
- Designated Non Government Representative Body (NGRB) for Catholic schools in NSW;
- Peak advocate for Catholic education to government, regulators, and the public;
- Single approved registration authority for systemic Catholic schools in NSW;
- Provider of sporting pathways through CSNSW Sport Services;
- Developer and distributor of high quality trial Higher School Certificate (HSC) examinations via Catholic Secondary Schools Association (CSSA).



How we support the sector

CSNSW exercises a broad leadership, policy, and compliance function through several core activity areas as detailed in **Figure B**.

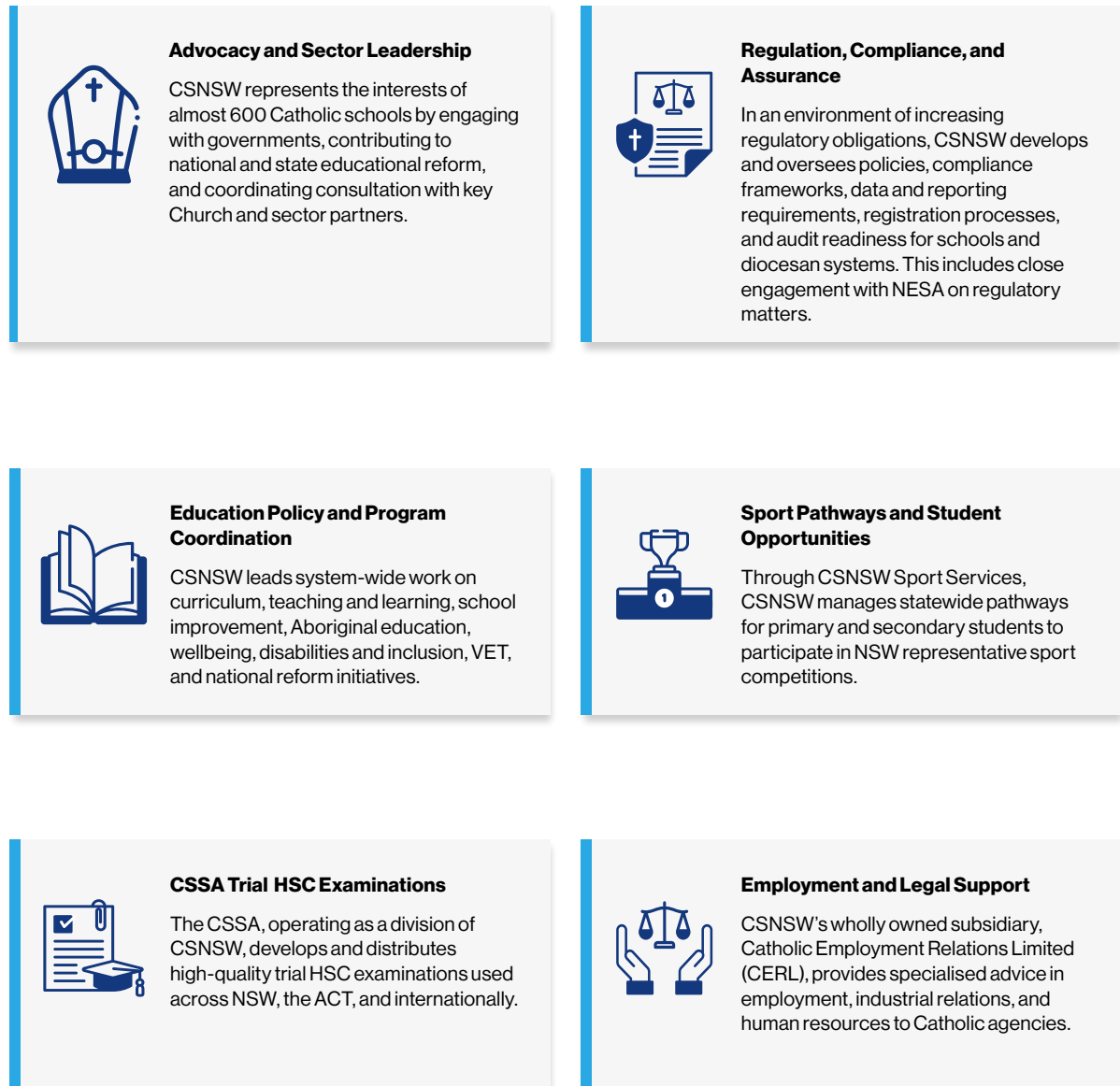


Figure B: Support CSNSW Provides to the Catholic Sector

Criteria 2: Our Structure, Operations and Supply Chains

Embedding Continuous Improvement to Advance the CSNSW Strategic Vision

Our structure and operations

CSNSW is a not for profit company limited by guarantee, incorporated and domiciled in Australia. Its members comprise the nine diocesan Bishops of NSW, the Archbishop of Sydney and the Archbishop of Canberra and Goulburn (Bishop Members). CSNSW's authority and remit are derived from the company Constitution and the Bishop Members' Canonical Mandate.

As of 31 December 2025, CSNSW employed a predominantly full time workforce. In 2023, CSNSW relocated its head office to Angel Place, 123 Pitt St, Sydney, to better support organisational growth. CSNSW's 2025 consolidated revenue was reported as \$42,873,418.

Catholic Employment Relations Limited (CERL), established on 12 August 2020, is a wholly owned subsidiary and operates from the CSNSW Angel Place offices.

This structural model illustrated in **Figure C**, positions CSNSW to advance its long term strategic vision—ensuring governance, operations, and service delivery are continually refined to meet emerging needs across Catholic education in NSW.

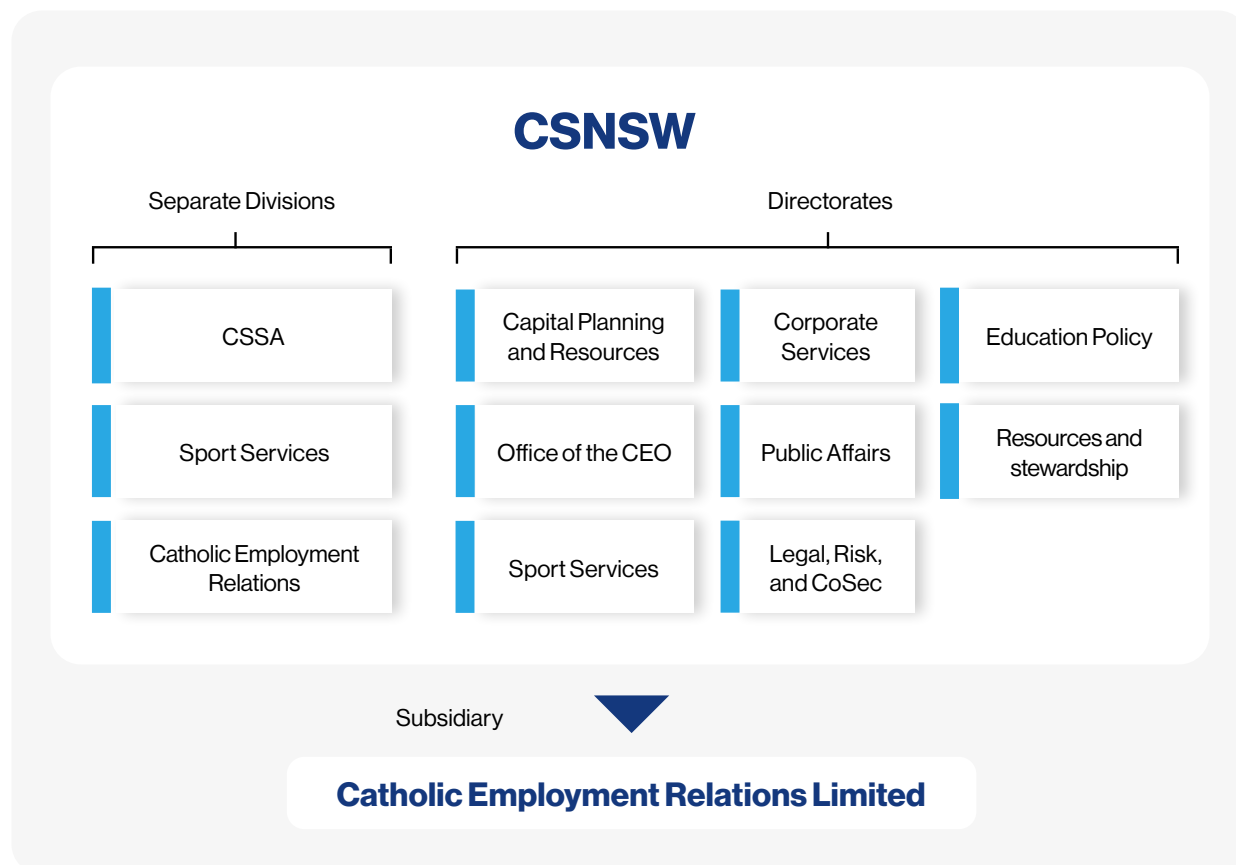


Figure C: CSNSW Organisational Chart



Board of Directors

CSNSW is governed by a Board comprising directors with diverse expertise across education, governance, Church leadership, and industry.

In 2025, the CSNSW Board comprised ten Directors, including the Chair. The Board brings diverse expertise and provides informed, forward looking decision making and oversight.

To fulfil its responsibilities and drive strategic oversight, the Board is supported by six committees, each operating under its own charter:

- Audit and Risk Committee (ARC)
- Capital Projects Evaluation Panel (CPEP)
- Catholic Education 2030 Committee (2030)
- Compliance and Resourcing Committee (CRC)
- Inter Diocesan Registration and Accreditation Committee (IDRAC)
- Nomination, Succession and Remuneration Committee (NSRC)



Mark Dorney
KMG (Ob) (Chair)



Anna Dickinson



The Most Rev
Danny Meagher



John Perrottet



Gráinne McCormack



Jenny Allen



Julian Widdup



The Hon. Michael Lee



Emeritus Professor
Toni Downes



Craig McGrory

Board Committees



* Merger of Executive Committee and Governance, Remuneration and HR Committees

Catholic Employment Relations

Catholic Employment Relations (CER), a division of CSNSW, is the bargaining representative for the NSW and ACT Catholic Systemic Schools enterprise agreements covering teachers, general employees and principals. CERL is a professional, service-based legal practice that provides advice on Australian law, employment relations, industrial relations, and human resources to Catholic agencies including Catholic Independent Schools (non-systemic), other Catholic education entities outside NSW systemic education, and non-education clients. CERL is a subsidiary of CSNSW and an incorporated legal practice within the meaning of the NSW Legal Profession General Uniform Rules 2015.



Management Team

The Management Team leads the organisation's work program, guiding policy development, operational effectiveness, and service delivery across the Catholic education network. Its remit includes:

- Delivering the Board approved strategic and operational program;
- Providing policy expertise in funding, curriculum, regulation, and teacher accreditation;
- Leading the CSSA Trial HSC Examinations program;
- Managing the receipt and distribution of Commonwealth and state recurrent and capital funding;
- Ensuring compliance with legislative and program specific requirements;
- Reporting on effectiveness and efficiency in Catholic education delivery;
- Offering sporting pathways through CSNSW Sport;
- Managing capital grants via the CBGA; and
- Strengthening collaboration across dioceses and Member RI/MPJP schools.



Dallas McInerney,
Chief Executive Officer



Marita Winters,
Deputy Chief Executive Officer



Monica Assaf,
Chief Legal and Risk Officer



Jere Gasparov,
Chief Operating Officer



Peter Yates,
Director,
Resources and Stewardship



Kevin Morrison,
Director,
Capital Planning and Resources



Robert Rush,
Director,
Sport Services



Joseph Watson,
Director,
Public Affairs

Governance, leadership and culture

CSNSW's governance, leadership, and culture underpin its capacity to deliver on its mission and long term strategic goals. The Board remains ultimately accountable for organisational governance and ensures that ethical practice, transparency, and continuous improvement guide decision making.

CSNSW utilises a SaaS enabled Governance, Risk and Compliance (GRC) platform to support obligations in a highly regulated environment. This system contributes to the organisation's continuous improvement by streamlining oversight, increasing visibility, and strengthening reporting and accountability.



Our operations and supply chain

CSNSW's operational and procurement practices remain broadly stable from year-to-year, encompassing everything from occasional, low value purchases with non contracted suppliers to long term strategic engagements governed by formal agreements. This consistency provides a clear foundation for strengthening our due diligence processes and monitoring emerging risks across our supply chain.

A significant proportion of CSNSW's expenditure is directed toward low-risk suppliers providing professional services, including research, consultancy, licensing, and membership arrangements, which collectively account for 77% of total supplier spend.

While the majority of these low-risk suppliers are based in Australia, their risk classification relates to the nature of the professional services provided rather than their geographical location.

Despite this, CSNSW maintains awareness that modern slavery risks can still arise within Australian operations and may be present deeper within the extended supply chains of our suppliers.

We recognise that even when engaging locally, goods and services may originate from or be influenced by offshore environments where risk factors are more pronounced. This understanding reinforces our commitment to improving visibility, strengthening supplier engagement, and enhancing procurement practices over time.

Our Risk Management Framework

CSNSW is committed to embedding risk management as a core organisational capability. The Board oversees the risk management framework, ensuring it supports both CSNSW's strategic objectives and day to day operations.

The framework promotes a systematic approach to identifying, analysing, mitigating, and reporting risks. The Management Team oversees operational risk management, supported by the Modern Slavery Liaison Officer (MSLO) and Modern Slavery Working Group (MSWG).

Continuous improvement is embedded through regular review of policies and procedures and the risk management framework, ensuring the framework evolves in step with strategic priorities and emerging risks.

CERL's risk management framework operates in alignment with the broader CSNSW framework, ensuring consistency, accountability, and effective oversight. The Managing Principal is responsible for the day to day implementation of risk management practices, ensuring risks are identified, managed, and escalated appropriately. Oversight is provided by the CERL Board, which reviews risk exposures and controls to ensure they remain within appetite. This governance structure ensures risk management at CERL is embedded, proportionate, and well integrated with CSNSW's enterprise wide approach.

How modern slavery risk management aligns with CSNSW's strategic plan

Modern slavery risk management is not a standalone compliance task, it aligns naturally and directly with several of CSNSW's 2026–2030 strategic priorities and values.

Figure D shows how modern slavery risk management aligns with and strengthens CSNSW's strategic priorities.

CSNSW Strategic Plan: *Towards 2030*

Strategic Priorities

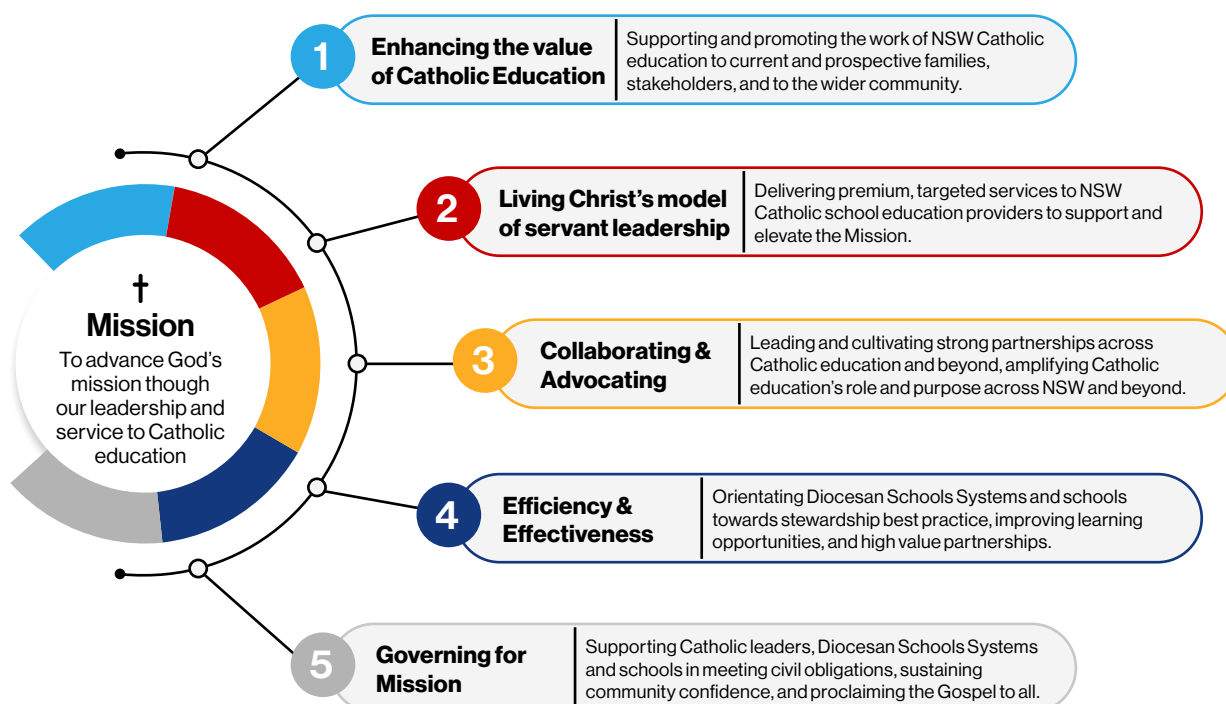


Figure D: CSNSW Strategic Plan: *Towards 2030*

Table A details how CSNSW's modern slavery initiatives support the strategic priorities.

1 Enhancing the value of Catholic Education	
Priority 1	Focuses on enhancing the value and strengthening the reputation and distinctiveness of Catholic education. CSNSW's modern slavery initiatives contribute to this strategic priority by: • Demonstrating that CSNSW not only meets but exceeds ethical expectations. • Expanding awareness among families, stakeholders, and the public that CSNSW's approach is anchored in justice, integrity, and care for the vulnerable. • Reinforcing Catholic identity and moral leadership in practical, measurable ways.
Strategic impact	Ethical stewardship and human dignity strengthen the value proposition of Catholic schooling and reinforce its mission.
2 Living Christ's model of servant leadership	
Priority 2	Emphasises delivering targeted services that elevate mission and embody servant leadership. CSNSW's modern slavery initiatives contribute to this strategic priority by: • Demonstrating a commitment to protecting the vulnerable, which is a central teaching of Catholic Social Teaching on human dignity and justice. • Providing tools, guidance, and training to staff and stakeholders, modelling leadership in ethical practice. • Raising awareness of modern slavery risks within Catholic communities and suppliers.
Strategic impact	By actively combatting modern slavery, CSNSW lives out a tangible expression of servant leadership and caring for those most at risk of exploitation.
3 Collaborating & Advocating	
Priority 3	Commits to cultivating strong partnerships and amplifying the role and impact of Catholic education across NSW and beyond. CSNSW's modern slavery initiatives contribute to this strategic priority by: • Working with Australian Catholic Anti-Slavery Network (ACAN), dioceses, RI/MPJPs, government bodies, and suppliers to improve ethical practices across the sector. • Creating shared responsibility and collective impact through supplier engagement, Sedex onboarding, and sector-wide risk remediation. • Advocating for ethical standards which reinforces CSNSW's leadership voice.
Strategic impact	Through shared anti-slavery initiatives, CSNSW strengthens relationships and provides unified sector leadership on a major ethical issue.

Table A: CSNSW's modern slavery initiatives and strategic priorities

4

Efficiency & Effectiveness**Priority 4**

Focuses on best practice stewardship, improving operations, and building high value partnerships.

CSNSW's modern slavery initiatives contribute to this strategic priority by:

- Creating efficient and well-governed procurement systems with supply chain mapping, risk categorisation, supplier audits, and anti slavery contract clauses.
- Applying modern slavery risk management to strengthen CSNSW's ability to choose trusted, compliant, ethical suppliers.
- Participating in ACAN and sharing due diligence tools to create shared efficiencies between Catholic entities.

Strategic impact

Ethical supply chain oversight reinforces sustainable, risk aware stewardship and is core to the 2030 Strategic Plan.

5

Governing for Mission**Priority 5**

Focuses on supporting Catholic leaders and systems to meet civil obligations, sustain community confidence, and proclaim the Gospel.

CSNSW's modern slavery initiatives contribute to this strategic priority by:

- Voluntarily opting into the legislative scheme, which attracts obligations under the Modern Slavery Act 2018 (Cth) and requires transparent governance, due diligence, and ethical stewardship.
- Adopting Modern Slavery frameworks (policy, training, risk assessments, appointment of a MSLO/MSWG) which directly support civil compliance obligations and good governance.
- Implementing ethical procurement and supplier oversight which uphold community trust and the Church's commitment to safeguarding and protecting human dignity.

Strategic impact

CSNSW's credibility as a regulating, funding, and advocacy body depends on visible ethical leadership and rigorous compliance systems.

Table A: CSNSW's modern slavery initiatives and strategic priorities

Reporting Criteria 3: Modern Slavery Risks in Operations and Supply Chain

Operational risks

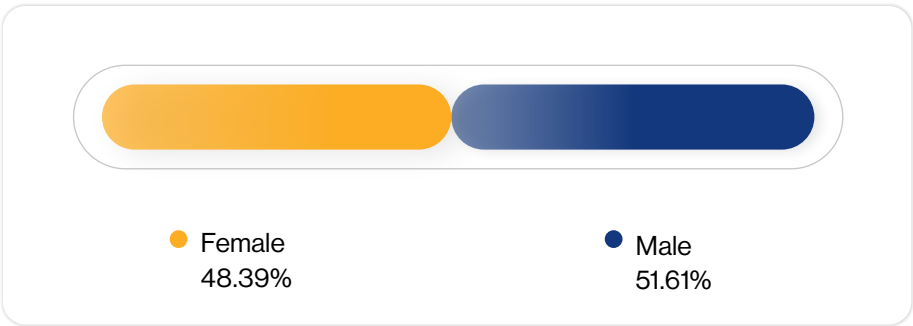
Our people

CSNSW continues to maintain a low risk operational profile, with most of our workforce employed in professional roles in Sydney, Australia. A breakdown of employees by employment type is presented in **Table B**.

Employee breakdown				
	Full time	Part time	Total Full Time Equivalent (FTE)	Total Headcount
Employee Status	75	6.9	81.9	87

Table B: Employee Breakdown

A breakdown of employee type by gender is set out in **Graph A**.



Graph A: Gender Profile of Employees

To ensure compliance with labour, employment and immigration requirements, CSNSW employs a full time Human Resources Manager and maintains a comprehensive suite of HR policies. CERL also provides professional legal, HR, employment, and industrial relations advice as required.

Frameworks and policies supporting modern slavery risk management

CSNSW's commitment to responsible, ethical and legally compliant operations is underpinned by a wide range of frameworks and policies. These policies reinforce strong governance, transparent practices, safe working environments, and responsible supplier management.

Table C provides an overview of CSNSW's policies relating to core governance, ethical conduct and risk management and their purpose to support the combat of modern slavery.

Policy	Purpose
Risk Management Policy & Program	Defines our structured approach to identifying, assessing, and managing organisational risks, forming the foundation for modern slavery risk controls.
Business Continuity Policy	Ensures CSNSW can maintain critical functions during disruptions, supporting resilience across operations and suppliers.
Fraud and Corruption Control Policy	Helps prevent, detect, and manage fraud and corruption risks, which often intersect with modern slavery vulnerabilities.
Whistleblower Policy/ Whistleblower Program	Enables confidential reporting of concerns, including unethical behaviour and issues related to modern slavery.
Conflicts of Interest Policy	Ensures transparency and impartial decision making across procurement and supplier engagement.
Delegations Policy	Clarifies decision making authority, strengthening oversight and accountability.
Policy Development Framework & Procedures	Ensures consistent formation, review, and approval of policies, including those linked to modern slavery.

Table C: CSNSW Policies

Table D details CSNSW policies that deal with workplace standards, employee conduct and safety requirements and the intent for each policy.

Policy	Purpose
Employee Handbook, including Code of Conduct	Sets behavioural and ethical expectations for all staff.
Work Health & Safety Policy and Procedures	Ensures safe and lawful working conditions for all workers and contractors.
Flexible Work Arrangements Policy & Procedures	Supports fair working practices and equitable workplace arrangements.
Child Safe Policy and Code of Conduct	Embeds a culture of child safety and aligns with safeguarding obligations.
Reporting Child Safety Concerns Policy	Provides mandatory reporting pathways for safety concerns involving children.
Statement of Commitment to Child Safety	Affirms CSNSW's commitment to child protection as a core ethical responsibility.
External Complaints Handling Policy and Procedures	Outlines a transparent and fair process for managing external grievances.

Table D: Workplace standards, conduct and safety policies

CSNSW also has policies relating to procurement, supply chain and modern slavery specific instruments, which are covered in **Table E**.

Policy	Purpose
Modern Slavery Policy	Directly guides CSNSW's prevention and management of modern slavery risks.
Model Supplier Code of Conduct	Sets the ethical, labour and human rights standards expected of all suppliers.
Vendor Management Policy	Provides a structured process for selecting, onboarding, evaluating and offboarding suppliers, supporting modern slavery due diligence.
Related Party Transaction Policies	Strengthen transparency and fairness in financial and contractual dealings.

Table E: Procurement, supply chain and modern slavery specific policies.

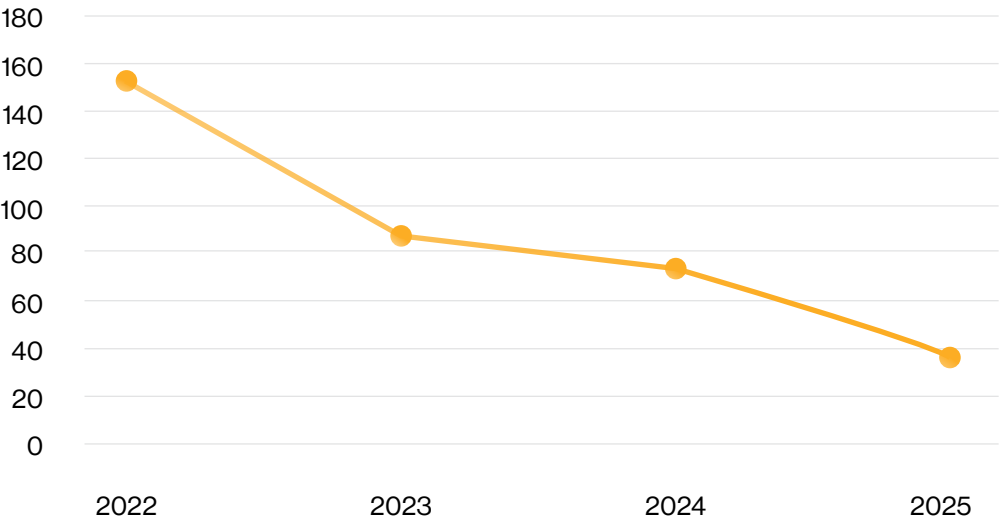
CSNSW’s supply chain is low risk

CSNSW’s overall exposure to modern slavery risk in its operations remains low, given our predominantly Australian professional services supplier base. All suppliers engaged by CSNSW to date have had no reportable concerns.

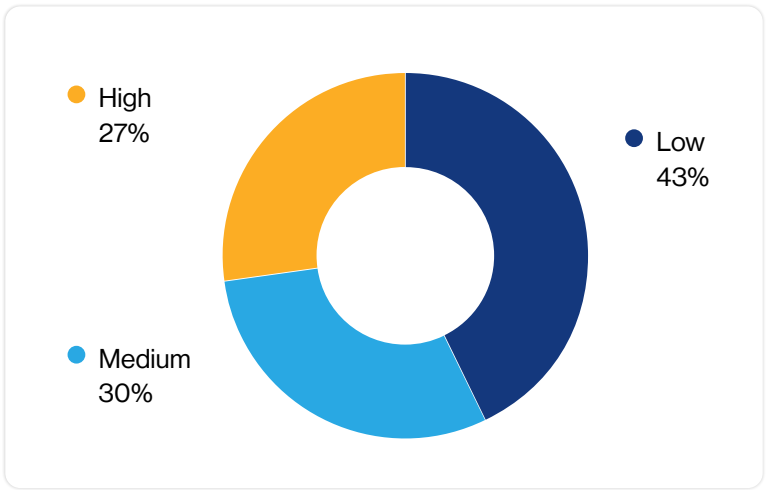
Importantly, our modern slavery risk profile remains consistent year to year, with no material change in supplier risk exposure.

Accompanying **Graphs B and C** set out below display the number of desktop audits conducted and the distribution of audits across higher risk supplier categories.

Modern Slavery Desktop Audits



Graph B: Modern Slavery Desktop Audits



Graph C: Risk Categories

Supply chain risks

CSNSW continues to assess modern slavery risks using the ACAN Category Risk Taxonomy, which is a classification standard that identifies the severity of actual or potential harm to people in spend categories.

The ACAN Category Risk Taxonomy is based on sources such as:

- The Global Slavery Index.
- The International Labor Organisation (ILO), including definitions of modern slavery.
- The Bureau of International Labor Affairs (ILAB), U.S Department of Labor.
- The Global Child Forum and UNICEF.

Four key factors are also used to determine the level of risk:

- Whether the supplier operates in a sector identified as high-risk by Australian or international guidance.
- The presence of goods listed in international high risk commodity reports, including the US Department of Labor's list of goods produced by child or forced labour.
- Country level modern slavery prevalence and government response ratings from the Global Slavery Index.
- Types of labour used in producing goods and services, including sectors reliant on low skilled, vulnerable, migrant, or "3D" (dirty, dull, dangerous) labour.

These categories align with the UN Standard Products and Services Code (UNSPSC), ensuring interoperability with procurement systems used across the Catholic sector.

Consistently with prior years, our suppliers predominantly operate within low risk, professional services industries, resulting in a stable and predictable risk profile.

While we continue to undertake desktop audits for new suppliers and selected suppliers from previous years, the overall number of audits has declined. This reduction reflects the growing consistency of our supplier base, with CSNSW engaging many of the same trusted suppliers from year-to-year. As a result, fewer new suppliers enter our procurement pipeline, reducing the need for repeated initial assessments.

Despite this decline in audit volume, our underlying risk profile has remained largely unchanged from previous years, as our operations and procurement activities continue to draw predominantly from low risk, professional service sectors.

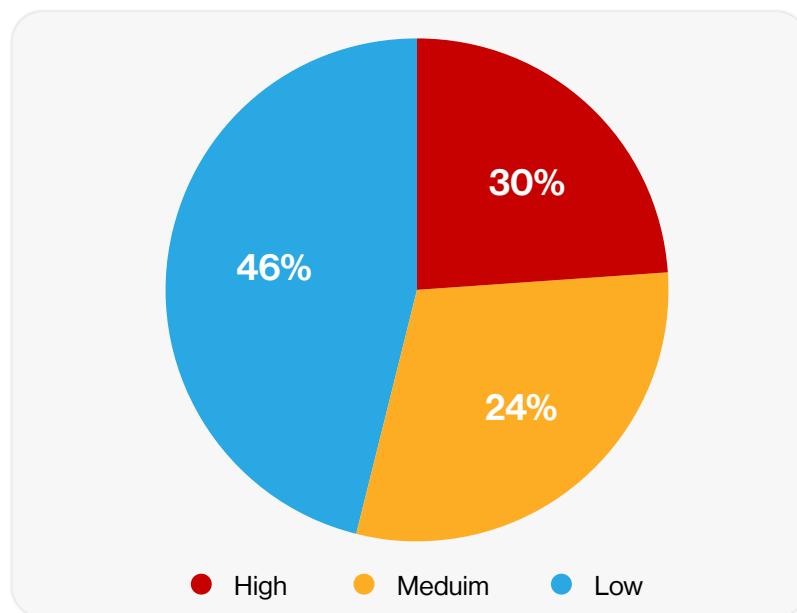


Overview of Supply Chain Risk Distribution

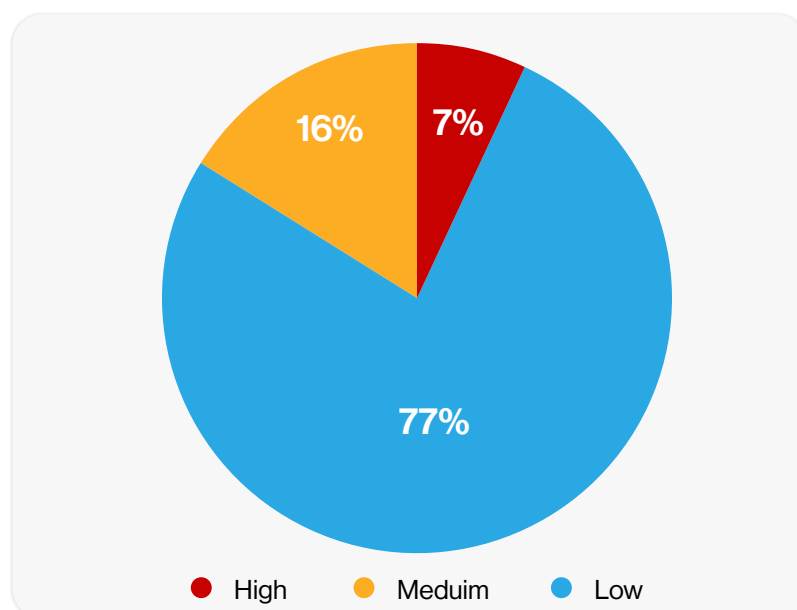
Our review of CSNSW's supplier base shows that most of our procurement activity occurs within low risk categories. When measured by the number of transactions and shown in **Graph D**, 46% of transactions come from low-risk suppliers. 30% of transactions is associated with medium risk suppliers, while high risk suppliers represent 24% of all transactions.

When viewed through the lens of total expenditure, the risk profile remains consistent. As illustrated in **Graph E**, 77% of CSNSW's total spend in 2025 is attributed to low risk supplier categories. Medium risk suppliers account for 16% of total spend, and high risk categories represent 7%.

This demonstrates that both our transactional activity and financial outlays are concentrated among suppliers presenting the lowest inherent modern slavery risk.



Graph D: Modern Slavery Risk Profile as % of Transactions



Graph E: Modern Slavery Suppliers by Risk Profile % Spend

Concentration of Spend in Low Risk Categories

CSNSW's two largest spend categories, professional services and licence/membership fees are classified as low-risk, together representing 74% of total expenditure for 2025. The most significant single category is professional services, which accounts for 49% of all spend and is assessed as low-risk.

This concentration of spend in low risk categories substantially reduces CSNSW's exposure to modern slavery risks and reflects the nature of our operations, which rely predominantly on professional, educational, and knowledge based services rather than goods or services sourced from higher risk geographies or labour intensive industries.

The relatively small proportion of transactions and spend in medium and high risk categories does not diminish our responsibility to manage risk but indicates that our modern slavery exposure is targeted and manageable.

These findings help focus our due diligence efforts on the areas where modern slavery risks are more likely to arise (typically suppliers operating in sectors such as facilities, technology hardware, or other industries known to have higher vulnerability in their upstream supply chains).

How the analysis informs our risk management approach

The statistics we collect support our ongoing commitment to risk based modern slavery governance. Specifically, they allow CSNSW to:

- Prioritise enhanced due diligence for suppliers operating within *medium* and *high risk categories*.
- Continue strengthening supplier engagement, particularly where visibility into labour practices may be limited.
- Allocate resources proportionately, ensuring that attention is focused where potential modern slavery risks are most likely to be present.
- Validate CSNSW's procurement patterns which are dominated by low risk professional services and are consistent with our risk tolerance and ethical sourcing expectations.



Reporting Criteria 4:

Actions Taken to Assess and Address Risk

CSNSW continues to take a proactive and ethically grounded approach to identifying, assessing, addressing and mitigating modern slavery risks. Our actions focus on strengthening policies, procedures, due diligence processes, supply chain transparency, training and awareness.

Our commitment is guided by our Modern Slavery Policy, endorsed by the Board and Leadership Team, and reflects CSNSW's ongoing mission to uphold human dignity, ethical stewardship, and the wellbeing of all people who may be at risk of exploitation. CSNSW's modern slavery risk management program is aligned with Catholic principles and responsible governance.

Initiatives undertaken

CSNSW undertakes continuous and repeatable actions each year as part of our business as usual modern slavery risk management program.

Key initiatives undertaken in the reporting period, including actions continued from previous years are included in **Table F**.

Key Initiatives	Actions
Modern Slavery Working Group (MSWG)	Established in 2024 and the group met twice in 2025 to oversee implementation, priority setting, and monitoring of actions.
Modern Slavery Policy Implementation	Ongoing adherence to the policy, which outlines CSNSW's commitment to prevent and manage modern slavery risks across operations, business partnerships, and supply chains.
Communication & Awareness	Continued communication of the policy and related program initiatives to employees and business partners.
Finance System Upgrade	Automation of supplier spend categorisation and modern slavery risk taxonomy for major suppliers.
Risk Assessment & Controls	Continued assessment of modern slavery risks across operations and supply chains.
Anti Slavery Requirements in Procurement	Integration of anti slavery clauses into relevant tenders and high-risk contract documents.
Supplier Due Diligence	Ongoing review of suppliers and business partners, with a requirement that suppliers maintain their own modern slavery risk management systems.
Training & Education	Raising employee and stakeholder awareness to support individual responsibility in identifying and reporting modern slavery concerns.
Access to Remediation (Domus 8.7)	Continued access to an independent program delivering remedies for workers impacted by modern slavery.
Membership of ACAN	Continued participation in ACAN's Modern Slavery Risk Management Program.
Supplier Risk Analysis & Engagement via ACAN	Identification of common suppliers, supplier risk assessments, due diligence, and engagement activities undertaken collaboratively through ACAN.

Table F: Key Initiatives and actions taken for Modern Slavery in 2025

Supplier Engagement

Through the ACAN Modern Slavery Risk Management Program, CSNSW receives supplier engagement support and access to shared data to strengthen supply chain visibility and risk identification.

In 2025, ACAN launched ROTA, a purpose built platform that centralises risk data and supports supplier engagement. Through ROTA and ACAN, CSNSW benefits from:

- ACAN Modern Slavery Risk Taxonomy for evaluating operational and supply chain risks.
- ACAN Supplier Survey capturing supplier workforce characteristics, overseas sourcing, and Sedex membership.
- Supplier Education in key high risk sectors (e.g., labour hire, construction, cleaning, overseas goods sourcing).
- Onboarding of Suppliers to Sedex including verification of business details and services.
- Sedex Self Assessment Questionnaires (SAQ) supporting supplier self evaluation and continuous improvement.
- Desktop Reviews identifying actions required from suppliers.
- Enhanced Screening via KYC Software for additional assurance.
- Corporate Social Compliance Audits providing independent verification of worker protection and legal compliance.
- Domus 8.7 Statement Assessments of selected high risk suppliers.
- ACAN Prequalified Supplier Directory enabling access to vetted, ethically aligned suppliers.



Supplier Risk Identification

Consistent with previous years, CSNSW's procurement profile continues to focus predominantly on professional services and licence/membership fees. A risk based approach is applied by categorising suppliers into high, medium and low risk tiers.

In 2025, CSNSW continued to use ACAN's 23 category risk taxonomy, informed by recognised global data sources such as the Global Slavery Index (2023), Global Estimates of Forced Labour (2022), Global Rights Index (2024), ILAB, and the US State Department Trafficking in Persons Report.

Risks are assessed using four key factors shown in **Figure E**.

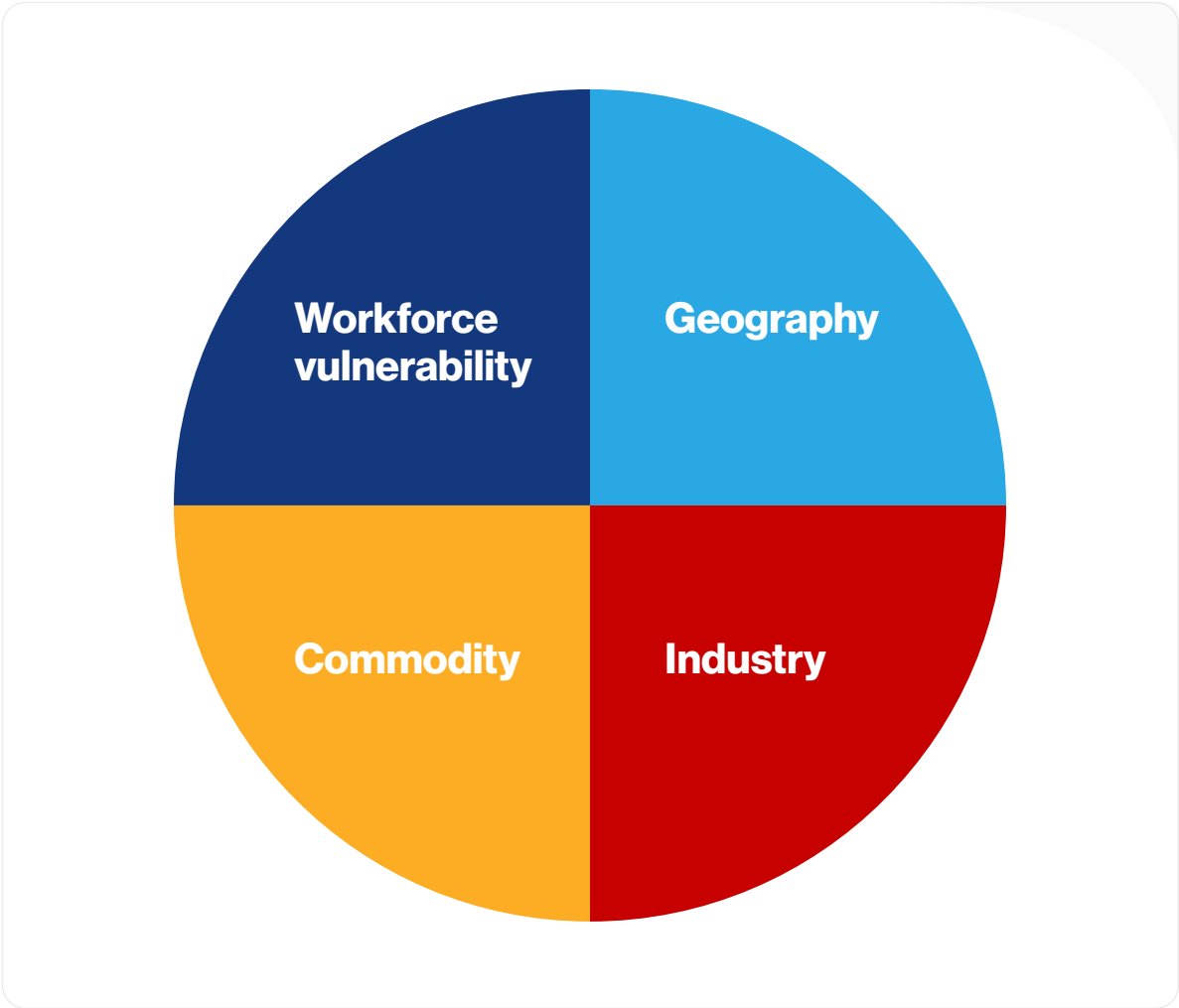


Figure E: Key Risk Factors

Addressing high and medium risk suppliers

For medium and high risk suppliers, CSNSW undertakes a structured due diligence process including:

- Desktop audits;
- Supplier questionnaires;
- Use of standardised Anti-Slavery Contractual terms; and
- Recording all findings in the CSNSW desktop audit supplier register.

Contract management

CSNSW uses a GRC system to record, monitor and track contract compliance.

Anti-slavery clauses in contracts

All new supplier contracts are reviewed by CSNSW's in house legal team who ensures modern slavery clauses are included wherever necessary, particularly for higher-risk engagements.

To date, CSNSW has not received any reports of modern slavery practices from suppliers.

NSW Catholic Block Grant Authority modern slavery requirements

As part of its administration of the NSW Catholic Block Grant Authority (CBGA), CSNSW has formalised modern slavery compliance requirements of the capital funding process.

Both Initial and Final Offers issued to school authorities now explicitly mandate the inclusion of modern slavery provisions in all contracts associated with CBGA funded capital works.

These measures ensure that each CBGA supported project upholds ethical labour standards, applies due diligence across supply chains, and aligns with CSNSW's broader commitment to safeguarding human dignity in all procurement and project delivery activities.



Model supplier code of conduct

CSNSW's Model Supplier Code of Conduct requires suppliers to:

- Not cause or contribute to modern slavery;
- Proactively identify and eliminate modern slavery risks;
- Conduct due diligence across their own supply chains; and
- Comply with all relevant laws, regulations and anti slavery frameworks.

Modern slavery working group

The MSWG, established in 2024, meets twice annually to:

- Provide input and advice to CSNSW on issues related to modern slavery;
- Provide expert advice;
- Support implementation of the CSNSW modern slavery action plan;
- Establish annual goals and priorities;
- Monitor effectiveness of actions taken; and
- Ensure CSNSW meets all legislative requirements.

Training

- On induction, all employees are required to complete mandatory modern slavery training comprising of three modules;
- New employees must complete the training within 30 days; and
- Suppliers and stakeholders may access ACAN's e-learning resources via Domus 8.7.

Board commitment

The Board approves CSNSW's annual Modern Slavery Statement and maintains full commitment to eliminating modern slavery risks across operations and supply chains.

Membership of ACAN

CSNSW continues to participate in and benefit from the ACAN Modern Slavery Risk Management Program.

Remediation

Through ACAN, CSNSW has access to Domus 8.7, which provides:

- A 24/7 Worker Careline;
- An online grievance mechanism;
- Outreach materials; and
- Independent remediation pathways for affected workers.

Reporting Criteria 5: Effectiveness assessment

CSNSW evaluates the effectiveness of its modern slavery risk management activities through ongoing monitoring, structured governance processes and supplier engagement.

While CSNSW continues to strengthen its foundations each year, the overall profile of key activities and outcomes, shown in **Table G**, has remained relatively consistent, reflecting the maturity and stability of CSNSW's existing controls rather than significant year on year operational change.

Modern Slavery Summary of Key Activities

	Activity	2025
Internal / Staff	Hours spent on modern slavery activities (including training and staff awareness initiatives)	350
	E-learning modules completed	On induction by all staff
External / Supplier Engagement	Number of suppliers	449
	Number of suppliers across high-risk categories	97
	High-risk suppliers as a percentage of spend	7%
	Number of ACAN Supplier Surveys completed in 2025	99
	Number of suppliers identified for Sedex onboarding in 2025	21
	Number of Suppliers who have completed e-learning	17
	Number of non-conformances in 2025	0
Domus 8.7 External Referrals	Contacts made via worker voice / grievance mechanism	0
	Referrals for advice and assistance	0
	Individuals identified or referred for modern slavery assessment	0
	Individuals with modern slavery cases remediated	0

Table G: Key Activities

Continuous improvement

Continuous improvement remains central to CSNSW's approach, supporting the proactive strengthening of systems before risks materialise.

Activities undertaken during the reporting period include:

- Ongoing monitoring of compliance tasks through the internal assurance program;
- Mandatory modern slavery awareness training assigned to all new employees during induction;
- Review of all contracts and agreements by CSNSW's in house legal team prior to execution, with continued rollout of modern slavery clauses based on risk; and
- Continued engagement and monitoring of suppliers, supported by the CSNSW Model Supplier Code of Conduct and Modern Slavery Policy.

Summary

Overall, CSNSW's effectiveness in addressing modern slavery risks has remained steady, with limited change compared with previous years. This stability reflects the consolidation of strong foundational processes, including supplier screening, contractual controls, staff training, and governance oversight that continue to function as intended.

While there were no identified cases, referrals, or non conformances during the reporting year, CSNSW recognises that absence of detected issues does not equate to absence of risk. CSNSW remains committed to continuously improving its approach, focusing on enhanced supplier engagement, increased data visibility, and strengthened accountability mechanisms to ensure robust and evolving responses to modern slavery risks in future reporting cycles.



Reporting Criteria 6: Process of Consultation with Entities Owned or Controlled

This Statement includes CERL.

CSNSW's policies and procedures apply across both entities and CSNSW's MSLO acts in a combined role.

During the reporting period this statement covers, CSNSW actively engaged and consulted with all employees of CERL. The employees of CERL undertake the same modern slavery mandatory training as CSNSW employees and CSNSW will continue to prepare an annual statement for both entities.



Reporting Criteria 7: Other Relevant Information

CSNSW has reviewed its activities for the 2025 reporting period and has not identified any additional relevant information to disclose under Reporting Criteria 7.



Appendix A: Glossary of Acronyms

ACAN	Australian Catholic Anti Slavery Network
ARC	Audit and Risk Committee
CBGA	Catholic Block Grant Authority
CER	Catholic Employment Relations
CERL	Catholic Employment Relations Ltd
CPEP	Capital Projects Evaluation Panel
CRC	Compliance and Resourcing Committee
CSNSW	Catholic Schools NSW
CSSA	Catholic Secondary Schools Association
GRC	Governance, Risk and Compliance
HSC	Higher School Certificate
IDRAC	Inter-Diocesan Registration and Accreditation Committee
ILAB	Bureau of International Labor Affairs
ILO	International Labor Organisation
MSLO	Modern Slavery Liaison Officer
MSWG	Modern Slavery Working Group
NGRB	Designated Non-Government Representative Body
NSRC	Nomination, Succession and Remuneration Committee
RI/MPJP	Religious Institutes/Ministerial Public Juridical Persons
SAQ	Sedex Self-Assessment Questionnaires
UNICEF	United Nations Children's Fund
UNSPSC	UN Standard Products and Services Code



**Catholic
Schools
NSW**





Catholic Schools
Parramatta Diocese

Modern Slavery Statement 2025



Disclosure note

This statement has been made on behalf of Catholic Schools Parramatta Diocese Ltd. Covering the reporting period 1 January 2025 to 31 December 2025, this statement focuses solely on work performed by Catholic Schools Parramatta Diocese Ltd ABN **66 661 001 798**.

Head Office is located at the Bethany Centre, 470 Church Street, North Parramatta NSW 2150.

parra.catholic.edu.au

Acknowledgement of Country

We would like to acknowledge the Darug and Gundungurra people who are the Traditional Custodians of this Land, here in Western Sydney - people who have loved and cared for this Land for thousands of years.

We would also like to pay respect to the Elders of the Darug and Gundungurra Nations, both past and present and emerging, and extend that respect to other Aboriginal people.

Authorisation

by Catholic Schools Parramatta Diocese Ltd Chair Elizabeth Crouch AM

I am pleased to present the sixth Modern Slavery Statement for Catholic schools in the Diocese of Parramatta. This marks our sixth statement overall and is the third submitted under Catholic Schools Parramatta Diocese Limited (CSPDL), with the previous three statements jointly submitted with the Diocese of Parramatta.

As a large non-government employer and provider of education services, CSPDL is strongly committed to ensuring that our workplaces and practices are free from all forms of modern slavery.

CSPDL is dedicated to upholding human rights and taking meaningful action to identify, address, and mitigate the risks of modern slavery within our operations and supply chains. We work in close partnership with the Australian Catholic Anti-Slavery Network (ACAN) to leverage our collective influence and drive the change that is urgently needed.

This Modern Slavery Statement outlines the actions we have taken throughout 2025 to assess and address the risks of modern slavery in our operations and supply chains. We acknowledge the need to remain vigilant and address emerging areas of risk and reaffirm our commitment to ongoing improvement on this pressing social justice issue.

On behalf of the Board of CSPDL, I fully support this statement and urge all our schools within the Diocese of Parramatta to deepen their understanding and explore ways we can work together to raise awareness and end modern slavery.



Elizabeth Crouch AM
Catholic Schools Parramatta Diocese Ltd Chair

29 May 2026

Approval

Catholic Schools Parramatta Diocese Ltd is a reporting entity as defined by the Modern Slavery Act 2018 (Cth). This Statement has been approved by the principal governing body of the reporting entity being the duly constituted board of Catholic Schools Parramatta Diocese Ltd.





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Reporting criteria 1 and 2:

About Catholic Schools Parramatta Diocese

The Diocese of Parramatta has a system of 80 schools, which are managed by a separate entity named Catholic Schools Parramatta Diocese (CSPD). In 2025, CSPD managed 58 primary schools, 22 secondary schools, two trade and inquiry campuses and three high support learning settings. CSPD educates over 46,500 students and employs more than 5,500 teaching and non-teaching staff.

The Trustees of the Roman Catholic Church for the Diocese of Parramatta is the sole Member of the incorporated entity under the leadership of Bishop Vincent Long Van Nguyen OFM Conv DD STL. The Board of Directors is responsible for the overall governance and strategic direction of the organisation. It provides “overall superintendence”, overseeing both performance and compliance in accordance with the organisation’s purpose and objectives. The Board delegates the responsibility for the management of the schools to the Chief Executive Officer, Mr Jack de Groot, and the Executive Leadership Team. CSPD has been acknowledged as a separate entity for taxation purposes and has been allocated its own ABN.

The Diocesan schools’ system is largely reliant on Commonwealth and State Government funding to continue delivering quality education and providing educational services to the Catholic and wider community. CSPD reviews all its operating budgets prepared by the individual schools and aggregates these school budgets with its own ‘head office’ functions in preparing consolidated operating and capital budgets. CSPD’s revenue for 2025 was \$968,056,000.

The education and formation of students in Catholic discipleship are at the heart of our Catholic school system. CSPD provides quality learning and teaching in a faith-centred environment.





46,500+
students



58
primary schools



22
secondary schools



5,500+
total staff



2 trade and
inquiry campuses



3 High Support
Learning settings



1 virtual
School of Now



Our strategy

What is our vision?

Enriching the lives of our students through education

Our strategic pillars



MISSION

Catholic by nature, not by name only

Develop faith filled, service-minded students in all cohorts, through an understanding of Catholic social teaching and encouraged by Catholic values to become active contributors to their community



PEOPLE

High performance culture

Encourage our people to deliver their best, by defining clear goals and targets, and offering active professional development opportunities and access to a supporting system



QUALITY

Strong academic achievement

Deliver relative learning gains maximising each student's potential, with evidence-based teaching practices, fit-for-purpose learning environment, early identification/intervention and targeted student support catering to all learning needs

How will we be distinct?

Students and families

Who do we want to serve?

- **Provide a Catholic education for all**, that is inclusive and not for Catholic families only
- Attract a student base broadly **representative of the communities we serve, increasing diversity** where we can (including: First Nations, EAL/D and high potential students), offering **special programs** for students with **high learning needs**
- Provide a **K-12** education, and deliver greater access to our system through **early childhood partnerships**

What are the key measures?

Catholic identity (KUL survey)
Community service (scale of impact)

Employee outcomes (employee engagement, turnover, professional learning opportunities)

Academic performance (NAPLAN, HSC, PAT-R, PAT-M)
Wellbeing (TTFM)

grounded in excellence, inclusivity and Catholic tradition



RELEVANCE

Breadth of opportunity

Encourage students to pursue their passions and choose the path aligned to their specific needs through diverse subject offerings, co-curriculars, and progression opportunities, both in higher ed and alternative pathways



SUSTAINABILITY

Financial stewardship

Establish scalable, unified and optimised systems, practices and processes that enable sustainable growth, effective and equitable resource distribution/contributions in our communities, maximising opportunities for staff and students



TRUST

Integrity, accountability and transparency

Promote integrity within our organisation, by putting the optimal systems and controls in place to effectively manage our people and financial resources

Parishes and communities

- Connect with both **local school and parish communities**, whilst also providing students with the opportunity to support the **broader community**
- Provide **schools** with the freedom to **create and drive** community service initiatives whilst **offering system-wide opportunities** organised by the centre

Staff

- Attract, develop and retain a teacher base of **subject matter leaders and experts in teaching** the curriculum, and **support staff** that enable CSPD to deliver the highest quality student outcomes
- **Reflect the diversity** of our communities in our workforce, where possible

Level of opportunity

(breadth of our offering, tertiary education offers, job positions)

Market share and financial performance
(growth, cost efficiency)

Compliance

(WHS incidents, ACSL standards, regulatory compliance)

Our organisational structure

Chief Executive Officer

Executive General Manager Learning Outcomes

Executive General Manager Quality & Performance

Executive General Manager Student Support

Executive General Manager Mission

Executive General Manager Communications & Engagement

Executive General Manager Legal, Governance & Risk

Executive General Manager People & Culture

Executive General Manager Finance & Infrastructure

Executive General Manager Information Technology

CSPD has established a Modern Slavery working group with a representative from each of the directorates listed above. The Working Group is jointly sponsored by the Executive General Manager Mission and the Executive General Manager Finance & Infrastructure.

Unfortunately, the Modern Slavery Working Group has been inactive this year. Going forward, the intention is to hold meetings at least quarterly throughout the year to raise awareness of Modern Slavery and to ensure that CSPD obligations identified and captured in action plans are regularly addressed.

Our operations

CSPD manages 80 Catholic Schools (58 primary schools and 22 secondary schools), along with two trade pathway campuses and three high support learning settings. It is responsible for educating 46,500 students and employing more than 5,500 staff. The CSPD Support Teams (central office) in Parramatta manage all activities that can be separated from schools (e.g. payroll, recruitment, technology provision, professional learning, facilities, etc.), so schools can focus on their core business of teaching and learning.

Our organisation

Our staff allocation is as follows:

MALE	FEMALE	TOTAL
1,153	4,714	5,867

We have 80 schools with a total student population of 46,500.

CSPD complies with the Fair Work Act 2009 (Cth), Modern Awards, and Enterprise Agreements with the directly employed workforce, including through a variety of HR documentation, policies and procedures, including:



Employment contracts



Safeguarding Strategy and Policy



Code of Conduct



Managing Workplace Complaints Policy



Employee Leave Policy



Managing Conduct and Performance Policy



Flexible Working Arrangements



Privacy Policy



Preventing Discrimination, Harassment, and Bullying Policy



Work, Health and Safety Policy



Acceptable Use of ICT and Social Media Policy



Whistleblower Policy



Reporting criteria 3:

Modern slavery risks in operations and supply chain

Risk Assessment

For Catholic entities, modern slavery risks are defined by the ACAN Category Risk Taxonomy, a classification standard that identifies the severity of actual or potential harm to people (saliency) in spend categories.

The ACAN Category Risk Taxonomy is based on sources such as:

- the Global Slavery Index
- the International Labour Organisation (ILO), including definitions of modern slavery
- the Bureau of International Labor Affairs (ILAB), US Department of Labor
- the Global Child Forum and UNICEF

Five key factors are also used to determine the level of risk:

- **Geography:** the country of location where a good is made or service is delivered
- **Industry:** the sector in which the making of goods or delivery of service occurred
- **Commodity:** the raw materials or components that comprise the goods or products
- **Workforce vulnerability:** such as bonded visas, temporary migrants, women or children known to be employed in specific industry sectors
- **Domus 8.7:** trends, cases, and risk intelligence identified through the Domus 8.7 remediation service, including grievances and remediation insights relevant to category and risk to workers.



Classification

HIGH RISK	MEDIUM RISK	LOW RISK
• Building and construction • Cleaning and security • Events and event management • Facility management and property maintenance • Finance and investment • Food and catering services • Furniture and office supplies • IT hardware • IT software and network services - offshore • Labour hire • Linen, laundry and textile products • Medical devices and supplies • Transport, logistics and warehousing • Uniforms and PPE • Waste management services	• Advertising & marketing • ICT Software and network services - onshore • Utilities • Fleet management, consumables and maintenance • Travel and accommodation • Print/mail provider	• Professional services • Financial expenses • Government and agency fees • License/membership fees

Note: The following categories are Not in Scope of the ACAN Category Risk Taxonomy

- Pastoral
- Payroll (excluding labour-hire and sub-contracting).

Through the ACAN Program, CSPD continues to focus activities with suppliers of labour and the operational risk associated with the following supply chain spend categories:

Cleaning and security services

CSPD works closely with a select group of Australian based suppliers who are placed on a panel to supply cleaning services. CSPD ensures that suppliers are aware of their employer obligations under the Fair Work Act.

Facility management and property maintenance, building and construction

CSPD works closely with a select group of Australian based suppliers who are placed on a panel to provide facility management, property management and building and construction services. CSPD ensures that the suppliers are aware of their employer obligations under the Fair Work Act.

Uniforms & Personal Protective Equipment (PPE)

CSPD works closely with a select group of Australian based suppliers who are placed on a panel to supply CSPD uniform requirements. CSPD ensures that the suppliers are aware of their employer obligations to meet requirements of the Fair Work Act with their local workforce.

Supply chain risk

The bar graph below illustrates a breakdown of supplier spend across procurement categories by high, medium and low risk of modern slavery. CSPD has active suppliers across 13 high risk procurement categories and is focused on working with them to effectively manage and mitigate modern slavery risks.

CSPD High Risk Spend Categories

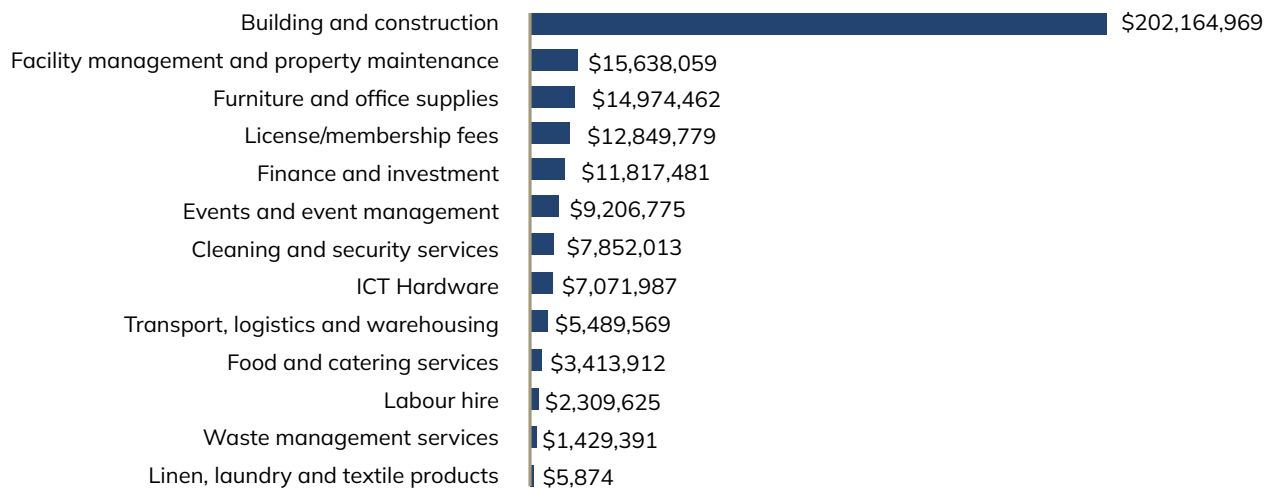
CSPD annual spend in High Risk Categories for calendar year 2025 was \$293,187,564.70, representing 68% of total spend with 2509 suppliers from a total of 3785 suppliers.

High	\$293,187,564.70	68%
Medium	\$97,029,240.20	5%
Low	\$20,232,118.22	23%
Not in Scope	\$19,086,084.60	4%
Grand Total	\$429,535,007.72	100%

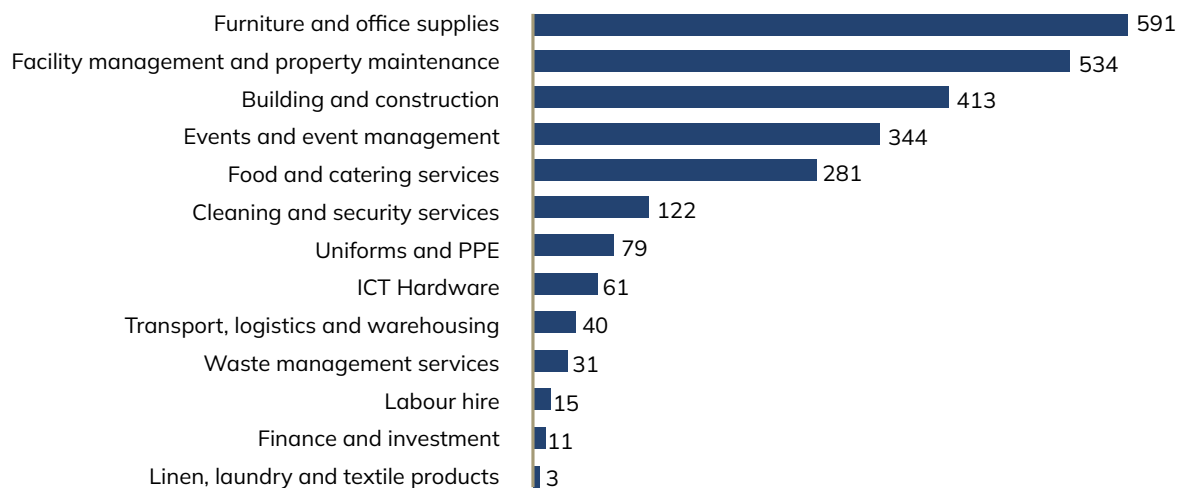
Total Spend - 2025 by ACAN Taxonomy Risk



\$ Spend in High Risk Taxonomy Categories



Number of Suppliers in High Risk Taxonomy Categories



Reporting criteria 4:

Actions taken to assess and address risk

Actions taken in 2025

CSPD followed the ACAN Program to assess and address the risk of modern slavery through the following supplier engagement plan.

The ACAN Program provides supplier engagement support and data, enabling a systematic and comprehensive supply chain risk assessment. In 2025, the ACAN Modern Slavery Risk Management Program launched a new purpose-built data management platform - ROTA. ROTA centralises the ACAN Risk Management Program framework and facilitates supplier performance evaluation and engagement.

1. Evaluation of the modern slavery risk within operations and supply chains, using the ACAN Risk Taxonomy
2. ACAN Supplier Survey to identify supplier revenue, number of employees, countries of origin for goods sourced overseas, workforce contractual arrangements and Sedex membership status
3. Supplier education on modern slavery and risk management in key areas: cleaning, building and construction, procurement of labour, labour hire and services, sourcing goods from overseas, grievance mechanisms and remediation
4. Onboarding suppliers to Sedex requires a business address, contact details and goods or services provided
5. Sedex Self-Assessment Questionnaire (SAQ) helps suppliers to evaluate their practices against established standards and identify areas for improvement
6. Desktop review to identify key actions required from suppliers
7. Enhance supplier screening using Know Your Client (KYC) intelligence software
8. Corporate Social Compliance Audits provide a point in time, objective and independent verification process of supplier alignment with local laws and worker wellbeing standards
9. Domus 8.7 Index modern slavery statement assessment on selected suppliers in high risk categories
10. ACAN Prequalified Supplier Directory - a list of preferred suppliers accessible to Catholic organisations.

CSPD made inroads with supplier engagement and participation in risk management activities, summarised:

- 995 suppliers completed the ACAN Supplier Survey
- 129 suppliers joined Sedex
- 94 suppliers completed the Sedex Supplier Assessment Questionnaire (SAQ)
- 8 supplier staff participated in ACAN modern slavery capacity building webinars.

In 2026, CSPD will undertake a desktop review of the Sedex suppliers SAQs, Social Audits or Corrective Action Reports



Supplier engagement

CSPD has been a member of Sedex via ACAN during the reporting period. Sedex is a data exchange platform designed to enhance data sharing and minimise the burden of risk assessments and risk validation by mutually recognising the results produced for specific shared suppliers, produced by other members' efforts, and vice versa.

CSPD uses the ACAN Risk Taxonomy to select high risk/high volume suppliers for onboarding to the Sedex platform. Once invited to join the platform as a supplier of CSPD, the suppliers fill in a self-assessment questionnaire (SAQ), and a risk score is produced (site characteristics risk score).

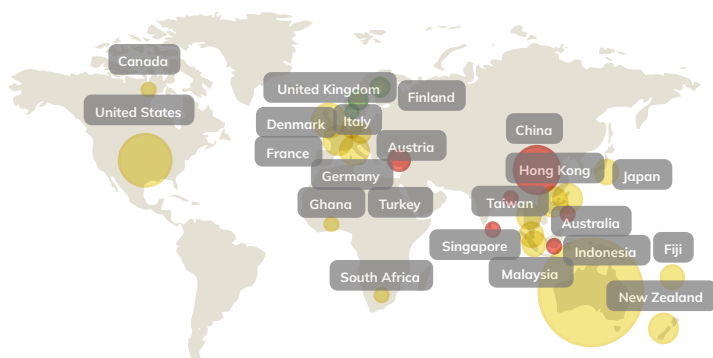
CSPD uses Sedex to:

1. Manage the risk of modern slavery with existing suppliers
2. Validate inherent risk against actual risk
3. Screen new suppliers as part of tenders and supplier onboarding processes
4. Gain visibility further upstream in the supply chains
5. Monitor and report on progress in the profile of suppliers.

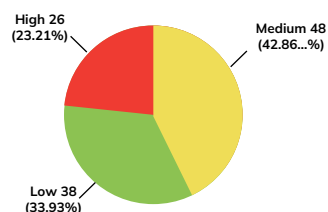
Supplier engagement overview

Total Suppliers	Suppliers in High Risk procurement categories	ACAN Supplier Surveys completed	ACAN Supplier Surveys completed in 2025
3,785	2,509	995	124
Suppliers identified for Sedex Onboarding	Supplier email shared	Supplier communication	Suppliers completing e-learning
80	0	2,028	8
Audits in 2025	Audits Findings in 2025	Suppliers on Sedex	SAQs Completed
14	96	129	94

Sourcing countries for Tier 1 suppliers



Sedex SAQ Risk Category



Supplier Screening - ACAN Collated

Enhanced 3rd Party Supplier Screening	3rd Party Supplier Screening - High and Medium Risk
529	25

Modern Slavery Working Group

The current Modern Slavery Working Group draws representation from Learning Outcomes, Communications & Engagement, Student Support, Quality & Performance, People & Culture, Legal Governance & Risk, Mission and Finance & Infrastructure (Procurement). The Working Group has joint executive sponsorship from the Executive General Manager Mission and Executive General Manager Finance & Infrastructure. The Modern Slavery Liaison Officer is the Manager Procurement and Contracts, who reports to the Executive General Manager Finance & Infrastructure.



Modern Slavery Contract Clauses

CSPD ensures all contracts, including Purchase Orders, have embedded clauses that address Modern Slavery obligations. These clauses are included in all new contracts and renewals.

Remediation

The Diocese of Parramatta is a founding member of Domus 8.7 remediation service. Domus 8.7 provides CSPD with:

- resources that enable us to listen to workers (grievance channel)
- a 24/7 careline for workers on our sites, staffed by professional counsellors
- direct support to people impacted by modern slavery
- guidance and technical assistance to prevent, identify and remediate modern slavery
- a documented process to assess if an organisation has caused, contributed to, or is directly linked to modern slavery and modern slavery indicators.

Domus 8.7 empowers people impacted by modern slavery to have choice and control over what forms of remediation are meaningful to them and to engage safely with business/supply chain actors. Supports may include:

- modern slavery indicator assessment
- needs assessments, case coordination, response and remediation planning
- referrals to community, social services, unions
- transport, accommodation, financial and food support
- legal support, referrals, accompaniment and advocacy
- job training, retraining and redeployment
- accompaniment and advocacy to engage with government and law enforcement agencies
- opportunities to contribute lived expertise to improve modern slavery responses.

The Domus 8.7 Advisory Committee Members also include a person with lived expertise, Mr Moe Turaga. Domus 8.7 is a registered charity with the Australian Charities and Not-for profits Commission (ACNC) and is an endorsed Public Benevolent Institution with Deductible Gift Recipient (DGR) status. ABN 244 72497189

Through Domus 8.7, CSPD will be able to help people impacted by modern slavery achieve outcomes that can be reported and used to continuously improve risk management and operational response. It is the intention of CSPD that any future grievances related to modern slavery be mediated through Domus 8.7. Where CSPD is directly linked to modern slavery by a business relationship, CSPD is committed to working with the supplier that caused the harm to ensure remediation and prevention of its recurrence.

CSPD staff and stakeholders are being equipped to recognise the causes of modern slavery, and the mechanisms available to escalate poor labour practices, unsafe working conditions and other indicators of modern slavery.

CSPD has also developed a more detailed anti-slavery contract clause focusing on remediation obligations and expectations, for inclusion in contracts with high risk suppliers. This clause imposes obligations on these suppliers to notify and consult CSPD to ensure victim-centred remediation processes are implemented to the satisfaction of CSPD.

When suspicions of modern slavery practices are notified through the whistleblower service or other channels, CSPD staff will continue to contact relevant law enforcement agencies if a person is in immediate danger and Domus 8.7 for an assessment, investigation, action planning and implementation of a remediation process.

Reporting criteria 5:

Effectiveness assessment

The ACAN baseline data table provides a comparative measure of supplier engagement and program activities to measure progress and inform future action planning.

Data analysis shows an increase in the number of suppliers completing the ACAN supplier survey. Visibility into self-reported information and modern slavery risks associated with individual suppliers improved as the number of Sedex SAQs completed increased.

	ACTIVITY	2024 CATHOLIC SCHOOLS PARRAMATTA DIOCESE	2025 CATHOLIC SCHOOLS PARRAMATTA DIOCESE
INTERNAL/ STAFF	Hours spent on modern slavery activities	100	100
	Individual staff completed e-learning	0	0
	e-learning modules completed	0	0
EXTERNAL/ SUPPLIER ENGAGEMENT	Total number of suppliers	3,792	3,785
	Number of suppliers across high risk categories	2,498	2,509
	Number of ACAN Supplier Surveys completed	606	995
	Supplier staff attending capacity building webinars	73	8
	Invited to join Sedex	96	80
	Joined Sedex	97	129
	Sedex SAQ completed	53	94
	Social audits	18	14
	Corrective actions	75	96
	Contacts made via worker voice/grievance mechanism	0	0
DOMUS 8.7 EXTERNAL REFERRALS	Referrals for advice and assistance	0	0
	Individuals identified or referred for modern slavery assessment	0	0
	Individuals with modern slavery cases remediated	0	0





Continuous improvement

Collaboration is at the heart of accelerating progress. This also includes opportunities to comparatively measure social, environmental and governance (business ethics) risks and actions with Catholic schools in the network.

In its foundational stages, CSPD used an internally devised ACAN framework to measure progress. This bespoke approach reflected the unique priorities, constraints, and practices across Catholic organisations.

In 2025, the ACAN Program adopted a globally recognised risk measurement system through Sedex. This aligns reporting entities with a methodology that combines global data about risks in different countries and industries with site-specific information from the Sedex platform. Sedex regularly updates the methodology to ensure it is aligned with new and emerging risks.

Therefore, completion of the Sedex SAQ is a priority for CSPD in 2026 as a substantial measure of continuous improvement year on year.

Action plan 2026-27

POSITION OR OPERATIONAL AREA	OUTCOMES	2026 ACTIONS	2027 ACTIONS
Board of Directors	Leadership and effective governance of modern slavery risks to people in supply chains and operations are effectively demonstrated, managed and reported	Review modern slavery progress at October Board meeting 100% Board members complete modern slavery e-learning course modules: MS101, Business Relevance, Implementing a MS Risk Management Program and Grievance Mechanisms and Remedy 1.5 hours self-pace	Review modern slavery progress at October Board meeting
Chief Executive Officer	Modern slavery risks to people in supply chains and operations are addressed through effective management systems	Monitor Modern Slavery Working Group (MSWG) 1-3 modern slavery communications per year to stakeholders Complete modern slavery e-learning course	Monitor Modern Slavery Working Group (MSWG) 1-3 modern slavery communications per year to stakeholders
Executive General Manager Finance & Infrastructure	Financial/ economic impacts of modern slavery risks to people in operations and supply chains are effectively managed Modern slavery risk management program allocated adequate resources Risk of modern slavery in investments is effectively managed, monitored and reported	Participate in MSWG Review and establish internal modern slavery reporting and budget requirements Modern slavery risk review of investments Ensure finance staff receive training on responsible investments and modern slavery Strengthen responsible investment policies by explicitly covering modern slavery Enhance disclosure on modern slavery and how this risk is managed in investments	Participate in MSWG Review and establish internal modern slavery reporting and budget requirements Modern slavery risk review of investments Ensure finance staff receive training on responsible investments and modern slavery Strengthen responsible investment policies by explicitly covering modern slavery Enhance disclosure on modern slavery and how this risk is managed in investments

POSITION OR OPERATIONAL AREA	OUTCOMES	2026 ACTIONS	2027 ACTIONS
Executive General Manager People & Culture	Direct workforce can evidence the skills, knowledge and attitude to effectively address risks of modern slavery in operations and supply chains aligned with modern slavery public commitment Entity has effective processes to provide remedy, is transparent, credible and accountable	Participate in MSWG Strategy for e-learning roll-out developed and implemented Accountabilities for modern slavery are integrated into new and existing position descriptions Complete workforce profile mapping	Participate in MSWG An effective grievance mechanism is deployed and monitored in operations so stakeholders can raise modern slavery concerns Continue to monitor and measure e-learning roll-out Modern slavery training and awareness incorporated into induction processes Provide performance reviews/management of modern slavery accountabilities Monitor changes in workforce profile Worker voice and wellbeing surveys Provide performance reviews/management of modern slavery accountabilities Staff awareness survey
Procurement	Robust systems are in place to effectively identify and mitigate modern slavery risks in the supply chain Regular risk assessment	Adjust and incorporate 2025 learnings to the risk identification framework Desktop review of min. 36 high risk suppliers Plan for Supplier Audit program (high risk suppliers identified after review)	Adjust and incorporate 2026 learnings to the risk identification framework Desktop review of min. 72 high risk suppliers through the year and 12 randomly selected low and medium risk suppliers

POSITION OR OPERATIONAL AREA	OUTCOMES	2026 ACTIONS	2027 ACTIONS
Procurement (continued)	Policy development and implementation Supplier engagement and training Monitoring and auditing Remediation and support Reporting and transparency Continuous improvement Collaboration and partnerships	Initiate pilot Audit program (social audit/human rights due diligence) for 5 suppliers identified through risk review activities Communicate with suppliers regularly about values, expectations, and outcomes. Include invitations to training and drive high risk suppliers to join the pre-screening platform Define required mitigating actions for non-compliance and timelines for completion, in collaboration with the MS Working Group and apply these when issues arise Refine measures and reporting on the actions 100 suppliers complete modern slavery e-learning	Engage deeper with 5 select suppliers to build capacity and demonstrate best practice Expand Audit program (social audit/human rights due diligence) to 12 suppliers identified through risk review activities Communicate with suppliers regularly about values, expectations, and outcomes. Include invitations to training and drive high risk suppliers to join the pre-screening platform Monitor that required mitigating actions for non-compliance and timelines for completion are maintained, in collaboration with the MS Working Group Refine measures and reporting on the actions Establish supplier due diligence checks and monitor supplier corrective action plans, audits or other reviews
Head Enterprise Risk	Modern slavery risk assessment criteria have been developed and are continuously monitored and reviewed	Participate in MSWG Coordinate and include modern slavery risks in CSPD risk register	Participate in MSWG Regular monitoring of modern slavery risks in CSPD risk register
Legal Team	Modern slavery risk is effectively managed according to legal requirements	Participate in MSWG Ensure legally compliant Modern Slavery Statement, policies and documents	Participate in MSWG Provide advice to Modern Slavery Working Group where relevant

POSITION OR OPERATIONAL AREA	OUTCOMES	2026 ACTIONS	2027 ACTIONS
Legal Team (continued)		Provide advice to Modern Slavery Working Group where relevant Review and monitor usage of modern slavery clauses in contracts Monitor and advise on legislative requirements relating to modern slavery Conduct legal and governance review of policies and documents regarding modern slavery	Review and monitor usage of modern slavery clauses in contracts Monitor and advise on legislative requirements relating to modern slavery Conduct legal and governance review of policies and documents regarding modern slavery
Executive General Manager Communications & Engagement	Management of modern slavery risks to people in operations and supply chain are effectively and actively communicated to stakeholders Communications demonstrate respect for rights of people impacted by modern slavery	Participate in MSWG Complete modern slavery e-learning course Annual modern slavery communications strategy developed and implemented Update and monitor intranet page Expand content on modern slavery web page e.g. supplier information Support branding and graphic design of Modern Slavery Statement Monitor ACAN communications and share as appropriate	Participate in MSWG Annual modern slavery communications strategy developed and implemented Update and monitor intranet page Update modern slavery web page Support branding and graphic design of Modern Slavery Statement
Modern Slavery Working Group (MSWG)	Modern slavery risk management is effectively managed by a cross-functional team within the organisation	Review and monitor Terms of Reference Action plan monitoring and review Complete entity Sedex SAQ as a measure of continuous improvement Provide progress reports to Board	Review and monitor Terms of Reference Action plan monitoring and review Complete entity Sedex SAQ as a measure of continuous improvement Provide progress reports to Board

POSITION OR OPERATIONAL AREA	OUTCOMES	2026 ACTIONS	2027 ACTIONS
Modern Slavery Liaison Officer (MSLO)	Modern Slavery Risk Management is embedded across the entity's operations and supply chains	Administer, coordinate and monitor MSWG Terms of Reference Participate in the ACAN monthly webinars, workshops and other activities Complete Sedex SAQ and ACAN Entity Profile Coordinate drafting of annual Modern Slavery Statement by MSWG members	Administer, coordinate and monitor MSWG Terms of Reference Represent entity to the Australian Catholic Anti-Slavery Network (ACAN) according to the Catholic Archdiocese of Sydney ACAN Terms of Reference Complete Sedex SAQ and ACAN Entity Profile Coordinate drafting of annual Modern Slavery Statement by MSWG members

Reporting criteria 6:

Internal consultation

CSPD does not have any controlled entities.



Reporting criteria 7:

Any other relevant information

This year's annual Mass for the Feast of St Josephine Bakhita united Australia's largest Sudanese and South Sudanese communities to honour their patron saint – a symbol of resilience in the fight against modern slavery and human trafficking.

The Mass was celebrated by Bishop of Parramatta, Most Rev Vincent Long OFM Conv on Sunday 16 February 2025 at St Patrick's Catholic Church, Mary Queen of the Family Parish, Blacktown.

St Josephine (1869-1947) was born into a wealthy family in Darfur, in the village of Olgossa, west of Nyala – the fourth largest city in Sudan. Despite these beginnings, she was kidnapped as a young child and sold into brutal and abusive slavery many times.

She eventually gained her freedom and joined the Canossian Sisters, but sadly, she had spent so much time in captivity that she had forgotten her original name. It was her slave owners who gave her the moniker "Bakhita", which means "fortunate" in Arabic.

St Josephine Bakhita was canonised on 1 October 2000 by Pope St John Paul II, becoming the first female black saint in the modern Catholic era. Her feast day is celebrated each year on 8 February. She is commemorated as the patron saint of South Sudan and Sudan, and of the victims of modern slavery and human trafficking.

Reflecting on her extraordinary life, Bishop Vincent shared that in freeing herself from the shackles of forced servitude and slavery, she became the model of living for others. "Josephine is proof that God can use the most unlikely people to do extraordinary things," Bishop Vincent said.









Catholic Schools
Parramatta Diocese

Bethany Centre, 470 Church Street
North Parramatta NSW 2150

parra.catholic.edu.au



DIOCESE OF
LISMORE
CATHOLIC SCHOOLS LIMITED

Modern Slavery Statement

1 January – 31 December 2025



Disclosure Note

This statement has been made on behalf of the Diocese of Lismore Catholic Schools Limited (DLCSL). This Statement covers all entities owned or controlled by DLCSL.

ABN 93 638 070 836

Modern Slavery Statement 2025 Approval



A handwritten signature in blue ink, reading "Mr Ross Tarlinton OAM".

Mr Ross Tarlinton OAM
DLCSL Board Chair

The DLCSL Board remains steadfast in its resolve to combat Modern Slavery. We continue to work, within our evolving governance model, to achieve elimination of serious exploitation in our supply chains.

The Board understands that ending Modern Slavery requires sustained effort, and that ongoing and targeted diligence is a key to achieving this important goal.

Our involvement in the Australian Catholic Anti-Slavery Network (ACAN) guides our modern slavery risk management program, which is targeted to risks to people in supply chains and operations.

DLCSL's ongoing participation in ACAN, and the measures described in this statement, are positive initiatives that will lead to real and meaningful outcomes as we work to address Modern Slavery in our supply chain.

I am committed to leading our community of schools in taking these fundamental steps towards achieving our Catholic values of care, dignity and respect for all.



A handwritten signature in black ink, reading "Mr Adam Spencer".

Mr Adam Spencer
Director of Catholic Schools/Chief Executive Officer

The Modern Slavery Statement was approved by the principal governing body of the Diocese of Lismore Catholic Schools Limited as defined by the Modern Slavery Act 2018 (Cth) ("the Act") on 25 May 2026. This Modern Slavery Statement is signed by a responsible member of the Diocese of Catholic Schools Limited as defined by the Act.

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Criteria 1 & 2: *About Diocese of Lismore Catholic Schools*

About us

In July 2020, Diocese of Lismore Catholic Schools Limited (“DLCSL”) was established. This signalled the largest organisational change in Catholic education in the Diocese of Lismore since the establishment of the systemic model in the 1970s. The DLCSL assists parish schools with the delivery of curriculum and catechetical programs, administration and compliance. This model complemented the highly decentralised parish-based approach to the governance and operation of schools.

The establishment of DLCSL has been a long and complex journey. The transition towards a governance and operational model has been substantial but much of it has been behind the scenes in building the foundations that DLCSL needs to be successful. There are still significant elements that need to be resolved, and this has brought us to a new phase in our governance model, identifying our Strategic Directions and outlining the priorities for our organisation over a three (3) year period (2025-2027). This strategy will support the organisation in making the operational changes required to address Modern Slavery in our supply chain.

The Diocese of Lismore stretches along the coastal strip of New South Wales from Tweed Heads in the north to Laurieton in the south, and west to the foothills of the Great Dividing Range. DLCSL provides a range of services to support 2,537 staff in 45 vibrant and dynamic school communities that serve more than 18,454 students (August 2025).

Under the pastoral leadership of the Bishop of Lismore, the Most Reverend Greg Homeming OCD, we work together to support schools to provide faith-filled, inclusive and caring environments that allow young people to grow in their faith and better understand the mission of Jesus Christ. This is achieved through Religious Education, faith formation, liturgical celebrations, sacramental programs, pastoral care and support.

The Mission of the Diocese of Lismore is to enable “our students to achieve the fullness of life”. Our vision is to “accompany students through Jesus Christ in educational centres of excellence that foster faith, learning and wellbeing outcomes where all students are cared for, respected and valued to become active members of their community.”

Genuine partnerships with parents, Parish Priests, Principals and school communities actively support our Catholic schools in educating students. Our Catholic schools offer rich, deep and varied learning experiences to our students so they may achieve a fullness of life.

The DLCSL and its schools aim to build teaching and leadership capabilities in communities of professional educators who share responsibility for school improvement and for achieving the best outcomes for our students.

These values and our partnerships not only support our Catholic schools in educating students but will support the Diocese’s commitment to identify modern slavery practices and mitigate modern slavery risk.

Diocese of Lismore Catholic Schools Limited (DLCSL) is an ACNC registered charity:

Location: Head Office, 3 Dawson Street, Lismore NSW 2480.

Phone: 02 6622 0422

Website: <https://www.lism.catholic.edu.au>

Email: admin@dlcsl.catholic.edu.au

Our Organisational Structure

The Trustees of the Roman Catholic Church for the Diocese of Lismore was formed on 5 May 1887, initially as the Diocese of Grafton, and changed to the current name in 1900.

On 16 December 2019, DLCSL was created by a resolution of the Trustees. DLCSL became the registered proprietor of the 45 schools from 1 July 2020.



Our Governance Framework

Governance Framework, Diocese of Lismore Catholic Schools



In recent years there have been ever-increasing compliance and legal requirements from Governments and regulatory bodies to ensure the delivery of high-quality education in a safe environment for students and those who work in our schools. These complex regulations placed significant burdens on individual Parishes under the previous governance model.

Progressing the Mission of Catholic education in the Diocese of Lismore is embodied in its Mission and Vision Statement, "enabling students to achieve the fullness of life" (John 10:10). By supporting our schools to accompany students through Jesus Christ in educational centres of excellence that foster faith, learning and wellbeing outcomes where all students are cared for, respected and valued to become active members of their community.

DLCSL is a not-for-profit public company limited by guarantee, established by the Diocesan Trustees to govern, administer and conduct Catholic schools within the Diocese of Lismore in the spirit of our Mission. DLCSL has responsibility for all governance issues in schools including compliance and regulatory matters. The Diocesan Trustees have appointed a Board of Directors who take responsibility for the implementation of the governance structure and for delivering Catholic education, in accordance with the Constitution of DLCSL.

The DLCSL Board has approved a number of key roles, teams and committees to assist the work of the Board in fulfilling its responsibilities. This has further enhanced DLCSL's ability to manage and mitigate modern slavery risk.

The DLCSL Board has responsibility for the governance of the business and subsequently has established three (3) Committees to ensure that the Board has effective mechanisms to deal with specific issues that require specialised areas of expertise. Modern Slavery Risk Management sits within Governance and is supported by the Finance & Infrastructure portfolio:

1. Mission and Education Committee
2. Finance, Audit and Risk Committee
3. Governance and Nominations Committee

Our Operations

The Diocese of Lismore stretches along the coastal strip of New South Wales from Tweed Heads in the north to Laurieton in the south and west to the foothills of the Great Dividing Range.

The DLCSL provides a range of services to support approximately 2,540 staff in 45 vibrant and dynamic school communities that serve approximately 18,450 students. Annual revenue is approximately \$438M with employee related expenses of \$347M.

The 45 systemic schools (34 primary and 11 secondary) exist as their own entities and are registered with ACNC as a charity.

The schools are:

St Joseph's Primary School Alstonville
St Francis Xavier Primary School Ballina
Xavier Catholic College Ballina
St James' Primary School Banora Point
St Joseph's College Banora Point
St Mary's Primary School Bellingen
St Mary's Primary School Bowraville
St Finbarr's Primary School Byron Bay
St Mary's Primary School Casino
St Mary's Catholic College Casino
St Augustine's Primary School Coffs Harbour
St John Paul College Coffs Harbour
St Joseph's Primary School Coraki
Mount St John Primary School Dorrigo
St Mary's Primary School Grafton
McAuley Catholic College Grafton
St Joseph's Primary School South Grafton
St Joseph's Primary School Kempsey
St Paul's College Kempsey
St Anthony's Primary School Kingscliff
St Brigid's Primary School Kyogle
St Joseph's Primary School Laurieton
St Carthage's Primary School Lismore
St John's College Lismore

Our Lady Help of Christians Primary School
South Lismore
St Patrick's Primary School Macksville
St Joseph's Primary School Maclean
St John's Primary School Mullumbimby
Mount St Patrick Primary School
Murwillumbah
Mount St Patrick College Murwillumbah
St Joseph's Primary School South
Murwillumbah
St Agnes' Primary School Port Macquarie
St Joseph's Primary School Port Macquarie
St Peter's Primary School Port Macquarie
MacKillop College Port Macquarie
Newman Senior Technical College
Port Macquarie
St Joseph's Regional College Port Macquarie
St Ambrose Catholic Primary School Pottsville
Mary Help of Christians Primary School
Sawtell
Holy Family Catholic Primary School
Skennars Head
St Joseph's Primary School Tweed Heads
St Joseph's Primary School Wauchope
St Joseph's Primary School Woodburn
St Francis Xavier Primary School Woolgoolga
St James' Primary School Yamba



45 Catholic Schools



in 22 Parishes



with 18 000 students



supported by 2 500 staff

Our People



In 2025, DLCSL employed 2,537 people across all entities who perform a range of roles with the primary purpose of education within the Diocese. The vast majority are employed on a continuing basis with a very low percentage of contingent workforce.

Our workforce has a gender balance of 74.7% female and 25.3% male.

DLCSL has a range of policies and procedures in place to cover industrial and whistle-blower legislative requirements. Policies and procedures are subject to a cyclical review, with internal review processes involving collaboration with a range of stakeholders.

Our Supply Chain

DLCSL manages multiple educational facilities within a range of demographic regions, and dedicated funding from a variety of sources. As such, procurement has been dispersed and siloed. This has resulted in a large number of suppliers, many with low spend, who are engaged in a variety of ways.

The DLCSL supply chain includes products and services (including labour) that contribute to and enable DLCSL to deliver quality education to students. The supply chain includes industries like construction, facility management, security, clearing, ICT, waste management and others. In 2025, DLCSL completed the complex task of mapping and analysing our supplier spend for suppliers where the total yearly spend exceeded \$30,000. Using our finance system we will be able to provide greater categorisation and a deeper granular view of spend profiles.

Criteria 3: *Modern Slavery Risks*

Operational Risks

Whilst we are not aware of any modern slavery practices in the supply chain, the sheer number of suppliers increases the uncertainty and lacks transparency. At this stage, the lack of visibility beyond tier one of suppliers is the biggest risk to DLCSL. Mitigating this risk is an evolving process as we better understand our suppliers and supply chain. Further, as more staff are aware of the issue of modern slavery, it is expected that the risks will become better understood, targeted and eliminated.

We continue as an organisation to roll-out our Risk Management Framework and work to embed the framework is ongoing. Elements of modern slavery risk continue to be identified and a program of control improvement is ongoing.

Human Resources also works with Catholic Employment Relations and the Independent Education Union to ensure that enterprise agreements and employment contracts comply with applicable legislation.

For Catholic entities, modern slavery risks are defined by the ACAN Category Risk Taxonomy, a classification standard that identifies severity of actual or potential harm to people in spend categories.

The ACAN Category Risk Taxonomy is based on sources such as:

- the Global Slavery Index
- the International Labor Organisation (ILO), including definitions of modern slavery
- the Bureau of International Labor Affairs (ILAB), U.S Department of Labor
- the Global Child Forum and UNICEF

Five key factors are also used to determine the level of risk:

- Geography: the country or location where a good is made or service is delivered
- Industry: the sector in which the making of goods or delivery of service occurred
- Commodity: the raw materials or components that comprise the goods or products
- Workforce vulnerability: such as bonded visas, temporary migrants, women or children known to be employed in specific industry sectors
- Domus 8.7: trends, cases, and risk intelligence identified through the Domus 8.7 remediation service, including grievances and remediation insights relevant to category and risk to workers.

Risk classifications by industry are shown in the table below.

Classification of Risk

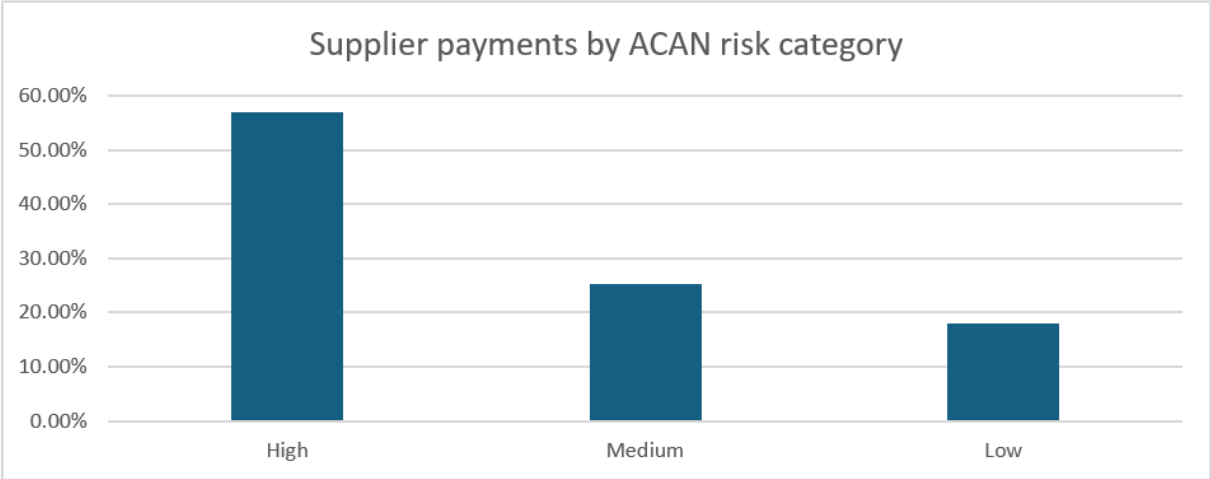
High Risk	Medium Risk	Low Risk
• Building and construction • Cleaning and Security • Events and event management • Facility management and property maintenance • Finance and Investment • Food and catering services • Furniture and office supplies • ICT Hardware • ICT Software and network services - offshore • Labour Hire • Linen, laundry and textile products • Medical devices and supplies • Transport, logistic and warehousing • Uniforms and PPE • Waste management services	• Advertising & Marketing • ICT Software and network services - onshore • Utilities • Fleet management, consumables and maintenance • Travel and accommodation • Print / Mail Provider	• Professional services • Financial expenses • Government and agency fees • License / membership fees

Note: The following categories are Not in Scope of the ACAN Category Risk Taxonomy

- Pastoral
- Payroll (excluding labour-hire and sub-contracting)

High Risk Categories Spend for 2025 (over \$30k/supplier only):

Category	Count of Suppliers	Sum of Total
High	1,186	\$40,931,311
Building and Construction	84	\$10,714,975
Cleaning and Security Services	71	\$3,948,120
Events and Event Management	146	\$4,152,310
Facility Management and Property Maintenance	348	\$7,665,282
Finance, Investment & Insurance	10	\$447,170
Food, Beverage and Catering Services	174	\$3,919,594
Furniture, Office & Educational Supplies	230	\$3,902,005
ICT Hardware	24	\$4,059,127
Labour Hire	5	\$215,999
Linen, Carpet, Laundry and Textile Products	15	\$452,877
Medical Consumables, Devices and Supplies	22	\$154,594
Uniforms and PPE	41	\$884,783
Waste Management & Recycling Services	16	\$454,474



Criteria 4: *Actions taken to assess and address risk*

2025 Modern Slavery Risk Management Initiatives

To support an awareness of Modern Slavery Risk throughout our organisation the following initiatives and/or actions were identified and carried out during 2025:

- Sharing of supplier spend data.
- Identification of suppliers who joined Sedex and completed Self-Assessment Questionnaires.
- Staff participation in ACAN webinars.
- Utilising finance systems to report on supplier data across the 45 schools within the diocese.

The focus for 2025 was working towards a governance framework which includes management of Modern Slavery Risk as an organisation.

The Modern Slavery Roadmap was tabled to the Audit and Risk Committee and the Board with the Board confirming its commitment to the eradication of Modern Slavery Risk.

The organisation continues to work towards updating agreement templates for goods and services to include clauses on modern slavery and utilise the resources from ACAN for the following actions:

- If DLCSL becomes aware of a possible breach of the Act, due to the complexity of remediation, we will adopt the Domus 8.7 process of remediation as developed by ACAN. (Refer to details about Domus 8.7, below)
- DLCSL remediation efforts, if required, may need to be enhanced through further policy development, detailed response procedures and engagement with Domus 8.7 and stakeholders. Utilising Domus 8.7, DLCSL can better support people impacted by modern slavery to achieve meaningful outcomes.

The ongoing work as a member of ACAN has enabled greater insight into modern slavery risk in our operations and supply chain. This included:

- Monthly peer meetings;
- Support with mapping suppliers;
- Developing and endorsing a Modern Slavery Policy;
- Refining financial reporting for schools and the company;
- Completion of a centralised IT asset management and purchasing project for implementation in 2026;
- MSLO participation in ACAN meetings/workshops throughout the year; and
- Continued participation in the ACAN risk management program.

Our Modern Slavery Action Plan initiatives during 2025 have seen some improvement at the completion of 2025.

Domus 8.7

DLCSL is a founding member of Domus 8.7. Domus 8.7 was established as an agency of the Catholic Archdiocese of Sydney in 2020 as a key element of the ACAN Modern Slavery Risk Management Program. Its collaborative approach to remediation is aligned with the Modern Slavery Act and Catholic Social Teaching and so is centred on the needs, wellbeing and empowerment of people impacted.

Domus 8.7 provides DLCS with:

- resources that enable us to listen to workers;
- a 24/7 careline for workers on our sites, staffed by professional counsellors;
- direct support to people impacted by modern slavery;
- guidance and technical assistance to prevent, identify and remediate modern slavery; and
- a documented process to assess if an organisation has caused, contributed or is directly linked to modern slavery and modern slavery indicators

Domus 8.7 empowers people impacted by modern slavery to have choice and control over what forms of remediation are meaningful to them and to engage safely with business/supply chain actors. Supports may include:

- modern slavery indicator assessment;
- needs assessment, case coordination, response and remediation planning;
- referrals to community, social services, unions;
- transport, accommodation, financial and food support;
- legal support, referrals, accompaniment and advocacy;
- job training, retraining and redeployment;
- accompaniment and advocacy to engage with government and law enforcement agencies; and
- opportunities to contribute lived expertise to improve modern slavery responses.

ACAN Supplier Engagement

The ACAN Program provides supplier engagement support and data, enabling a systematic and comprehensive supply chain risk assessment. In 2025, the ACAN Modern Slavery Risk Management Program launched a new purpose-built data management platform - ROTA. ROTA centralises the ACAN Risk Management Program framework and facilitates supplier performance evaluation and engagement. The framework utilises the following key elements.

- Evaluation of the modern slavery risk within operations and supply chains, using the ACAN Risk Taxonomy

- ACAN Supplier Survey to identify supplier revenue, number of employees, countries of origin for goods sourced overseas, workforce contractual arrangements and Sedex membership status.
- Supplier education on modern slavery and risk management in key areas: cleaning, building and construction, procurement of labour, labour hire and services, sourcing goods from overseas, grievance mechanisms and remediation
- Onboarding suppliers to Sedex requires a business address, contact details and goods or services provided
- Sedex Self-Assessment Questionnaire (SAQ) helps suppliers to evaluate their practices against established standards and identify areas for improvement
- Desktop review to identify key actions required from suppliers
- Enhance supplier screening using Know Your Client (KYC) intelligence software
- Corporate Social Compliance Audits provide a point in time, objective and independent verification process of supplier alignment with local laws and worker wellbeing standards
- Domus 8.7 Index modern slavery statement assessment on selected suppliers in high-risk categories
- ACAN Prequalified Supplier Directory - a list of preferred suppliers accessible to Catholic organisations

Modern slavery action plan and road map

High Risk Procurement Categories

Category	Planned Actions	Progress
Management systems	Finance, Audit & Risk Committee reports Quarterly utilising a dashboard report from the Functional Risk Register	Finance, Audit and Risk Committee quarterly reporting regime to be established. Modern Slavery is a standing item on the agenda
	Review the Modern Slavery Risk Register	Planned for 2026/27
	Dashboard Risk Reports	Completed
	Internal newsletter articles	To be introduced during 2026
	Integration with Risk Registers and control improvement plans	Planned for 2026/27
	Risk Management Framework	Planned for 2026/27
Risk Management	Functional Risk Register development	Planned for 2026/27
Human Resources and Recruitment	Introduce Modern Slavery Risk into Induction Program	ACAN training to be reviewed and potentially included in HR induction for leaders.
Procurement and Supply Chain	Review procurement policy	In progress and due for completion in 2026

Criteria 5: *Effectiveness Assessment*

Effectiveness

An analysis of our Sedex Supplier engagement by High Risk Categories for 2025:

	ACTIVITY	2025 DLCS Schools Office
INTERNAL / STAFF	Hours spent on modern slavery activities	10
	Individual staff completed e-learning	0
	E-learning modules completed	0
EXTERNAL / SUPPLIER ENGAGEMENT	Total number of suppliers	2092
	Number of suppliers with visible contact information and ABN	2008
	Number of suppliers across high-risk categories	1185
	Number of ACAN Supplier Surveys completed	456
	Supplier staff attending capacity building webinars	25
	Invited to join Sedex	73
	Joined Sedex	81
	Sedex SAQ completed	90
	Social audits	13
DOMUS 8.7 EXTERNAL REFERRALS	Contacts made via worker voice / grievance mechanism	0
	Referrals for advice and assistance	0
	Individuals identified or referred for modern slavery assessment	0
	Individuals with modern slavery cases remediated	0

2025 was the third year that the DLCSL actively participated in Sedex and Supplier Self Assessments with our suppliers. More suppliers have been included in the analysis this year due to the lower spend threshold. We also note an increase in the number of suppliers joining Sedex, (an additional 14) and completing the Sedex SAQ, (an additional 4). We acknowledge the excellent work of the ACAN network in engaging with these suppliers.

As our organisation matures in its approach to centralised management of our Supply Chain, we will focus on continuing to increase our engagement in this area.

Our Plans for 2026

To further our commitment to eliminating modern slavery in our supply chains and meeting our legislative requirements, DLCSL has identified the following priorities:

- Recruitment of a Procurement Manager who will drive and co-ordinate activities to improve performance in this area.
- Roll out ACAN modern slavery training modules to key staff. Particular attention is to be given to staff members responsible for purchasing decisions in Diocesan schools.
- Continue with the categorisation of existing suppliers to ensure all have been accurately classified for risk.
- Develop a preferred supplier system which operates across the Diocese, reducing the number of different suppliers engaged and improving our ability to monitor modern slavery risk.
- Increase utilisation of Sedex in developing the preferred supplier listing. Audit to be undertaken of existing suppliers registered with Sedex accompanied by a top-down approach based on 2025 spend of unregistered suppliers, informing them of the mutual benefit of registering with this platform.
- Reduction in the number of suppliers through a centralised strategic procurement model incorporating the use of preferred suppliers. This will be achieved through the recruitment of a Procurement Manager for the Diocese with modern slavery central to their activities;
- Further development of supplier categorisation to improve reporting on supplier spend, with a focus on ACAN advised “High Risk” categories;
- Targeting suppliers with high-risk categories for modern slavery – construction, facility management and property maintenance, cleaning and security services supply and inviting these suppliers to join Sedex and complete the Self-Assessment Questionnaire (SAQ).

Our activities in this area are still maturing.

Certain processes within our supply chain, as well as ongoing participation in ACAN will provide us with a mechanism to help track the effectiveness of our actions. For example, where a supplier may have been subject to an ethical audit, and detailed action plans have been put in place to address findings, we will work with the supplier to ensure that the action plans identified are implemented in a timely manner.

We will undertake monitoring of our supply chain at progressive stages, followed by a future audit to ensure that our actions are effective, sustainable and permanent. This provides us with the assurance that our actions will support improved working conditions for the employees involved and validates the effectiveness of our actions on the ground.

The inclusion of a modern slavery clause in all contracts for the supply of goods and services to DLCSL will ensure that DLCSL is not only complying with ACAN requirements, but is also addressing supply chain risks in accordance with the Risk Management Framework. The modern slavery clause has been drafted in a manner that places the onus on the provider of goods and services. They must ensure that risks related to modern slavery in the practices of operations and supply chains

used in the provision of goods and services are identified, assessed and addressed. In addition, a contract compliance statement has been developed and completion is required for all contracts prior to signing. This requires legal and finance oversight and review.

The modern slavery clause will place a contractual requirement on the provider of goods and services to address or remove any practices that are identified in relation to the performance of the agreement or contract, including addressing practices of other entities in its supply chain.

We will continue to pursue inclusion of modern slavery clauses in all contracts. A shared understanding between DLCSL and its suppliers of the risks related to modern slavery, and of the underlying reasoning for the inclusion of such a clause will enable DLCSL to be assured that appropriate practices are utilised in the procurement process.

These activities will lead to development of metrics which can be used to gauge efficiency moving forward.

Managing modern slavery risk will be a key task for the DLCSL Board Finance, Audit & Risk Committee, and it will support our strategic initiatives in monitoring the supply chain.

As we build capability and resources, we will conduct forums on supplier engagement, risk and assurance activities which will provide a dialogue on the consistency of practice and shared learnings. We will continue to explore further mechanisms via our membership in ACAN to assess the effectiveness of actions we undertake to address modern slavery.

Criteria 6: Consultation with Owned or Controlled Entities

No entities owned or controlled by DLCSL.

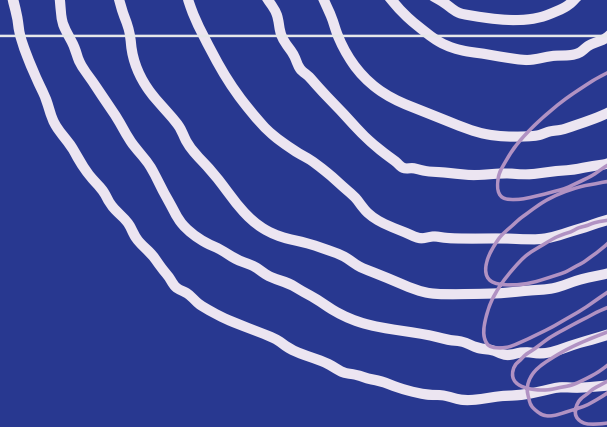
Criteria 7: *Any Other Relevant Information*

Nil.

Modern Slavery Statement 2025

1 JANUARY 2025 – 31 DECEMBER 2025





DISCLOSURE NOTE

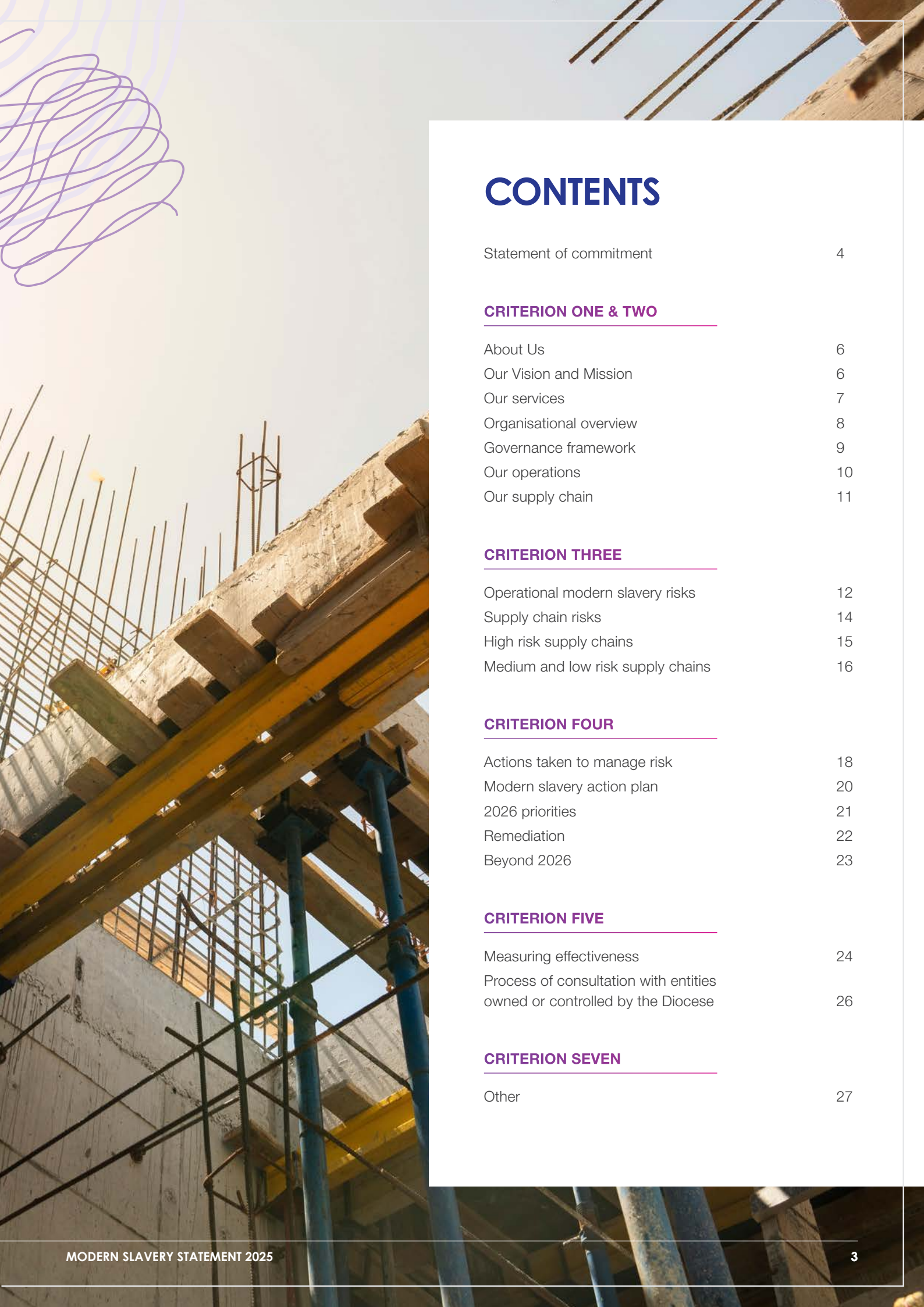
This statement has been made on behalf of the Catholic Diocese of Maitland-Newcastle.

This Statement covers all entities owned or controlled by the Diocese of Maitland-Newcastle.

Trustees for the Roman Catholic Church and the Diocese of Maitland-Newcastle.

ABN 62 089 182 027

841 Hunter Street, Newcastle West NSW 2302



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STATEMENT OF COMMITMENT

Approval and signature

On behalf of the Catholic Diocese of Maitland Newcastle, I am pleased to present our sixth Modern Slavery Statement. In 2025, the Church celebrated the Jubilee with the theme "Pilgrims of Hope." In that spirit, we hold firm to the hope that one day modern slavery will end.

Modern slavery is a violation of human rights and dignity. It takes many forms, including forced labour, exploitation, debt bondage, and other practices that strip away freedom. Sadly, the number of people experiencing modern slavery is not diminishing, with the Global Slavery Index 2023, reporting that there are 50 million people living in situations of modern slavery on any given day. In Australia an estimated 41, 000 people are enslaved.

The Catholic Church has a strong and enduring commitment to eradicating modern slavery, founded in the belief that every person has the indisputable rights to freedom and dignity. The Diocese acknowledge that business activities, including our own, can impact vulnerable people. Therefore, we take practical steps to manage these risks, drive change, and work toward eliminating modern slavery. Our commitment includes transparency, ethical and responsible practices

across all operations, policies, governance, and partnerships.

Our 2025, statement, outlines the actions we have taken to address modern slavery risks within our operations, guided by the Church, Australian and NSW Government frameworks, and with the support of the Australian Catholic Anti-Slavery Network (ACAN). Together, we strive for meaningful change.

This Modern Slavery Statement was approved by the principal governing body of the Diocese of Maitland Newcastle as defined by the Modern Slavery Act 2018 (Cth) ("the Act"), being the Trustees of the Roman Catholic Church for the Diocese of Maitland Newcastle, on 20/06/2025.

Yours sincerely in Christ,



Bishop Michael Kennedy,
Diocese of Maitland-Newcastle
June 2026



ABOUT US

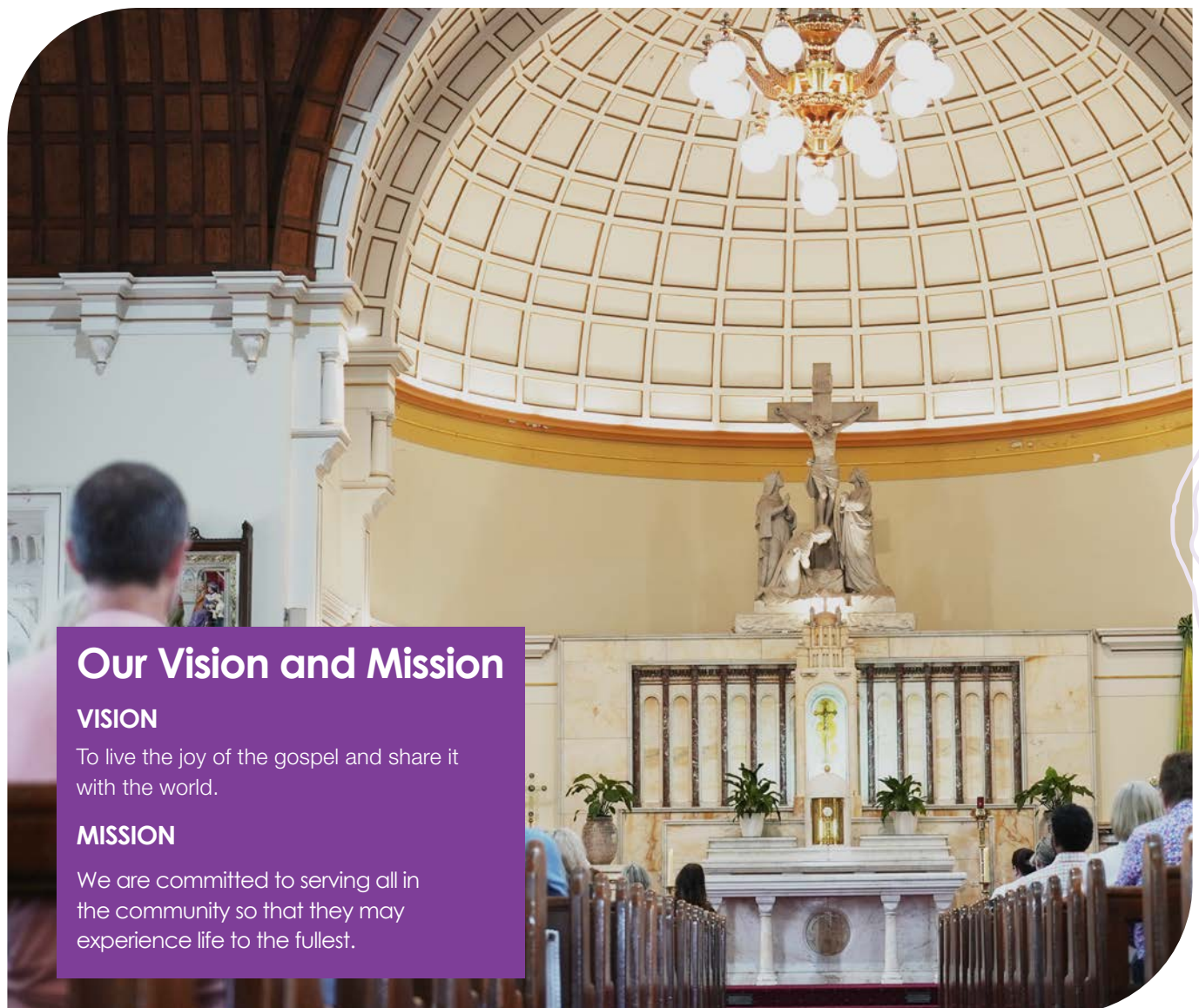
The Diocese of Maitland Newcastle represents the Catholic community across a geographic region extending from Lake Macquarie in the south to Taree in the north, and west to Merriwa and Murrurundi in New South Wales. A diocese is a community of the faithful entrusted to the pastoral care of a Bishop and forms part of the broader mission of the Catholic Church.

The Diocese serves the Hunter and Manning regions and supports a Catholic population of more than 148,000 people through an extensive network of parishes, pastoral ministries and diocesan agencies. These agencies deliver a broad range of services, including education, social welfare, early childhood education, out of school hours

care, housing, community development and financial services. Key agencies include Catholic Schools (Diocese of Maitland Newcastle), CatholicCare Social Services, St Nicholas Early Education and OOSH, the Catholic Community Fund, and Hunter Community Housing.

The Diocese employs approximately 5,400 staff across its agencies and operations. Diocesan governance, financial administration and central support functions are coordinated through the Diocesan Head Office, located at 841 Hunter Street, Newcastle West, NSW 2302.

For the reporting period, the Diocese of Maitland Newcastle had an annual consolidated revenue of \$675,020,984.



Our Vision and Mission

VISION

To live the joy of the gospel and share it with the world.

MISSION

We are committed to serving all in the community so that they may experience life to the fullest.

OUR SERVICES



58 schools with over

21,450 students



40+

clergy members undertook annual safeguarding training with the OoSG



1,079

employees completed the Office of Safeguarding (OoSG) Advanced Safeguarding



4,100+

completed the OoSG 'Safeguarding Children & Vulnerable Adults' online module



Hunter
Community
Housing

Tier 2

Community Housing Provider

St Nicholas

DIOCESE OF MAITLAND-NEWCASTLE

30 St Nicholas OOSH services with

5,100+

students enrolled



12 St Nicholas Early Education centres serving more than

1600 children



2,900+

clients and families supported through CatholicCare



17,200+

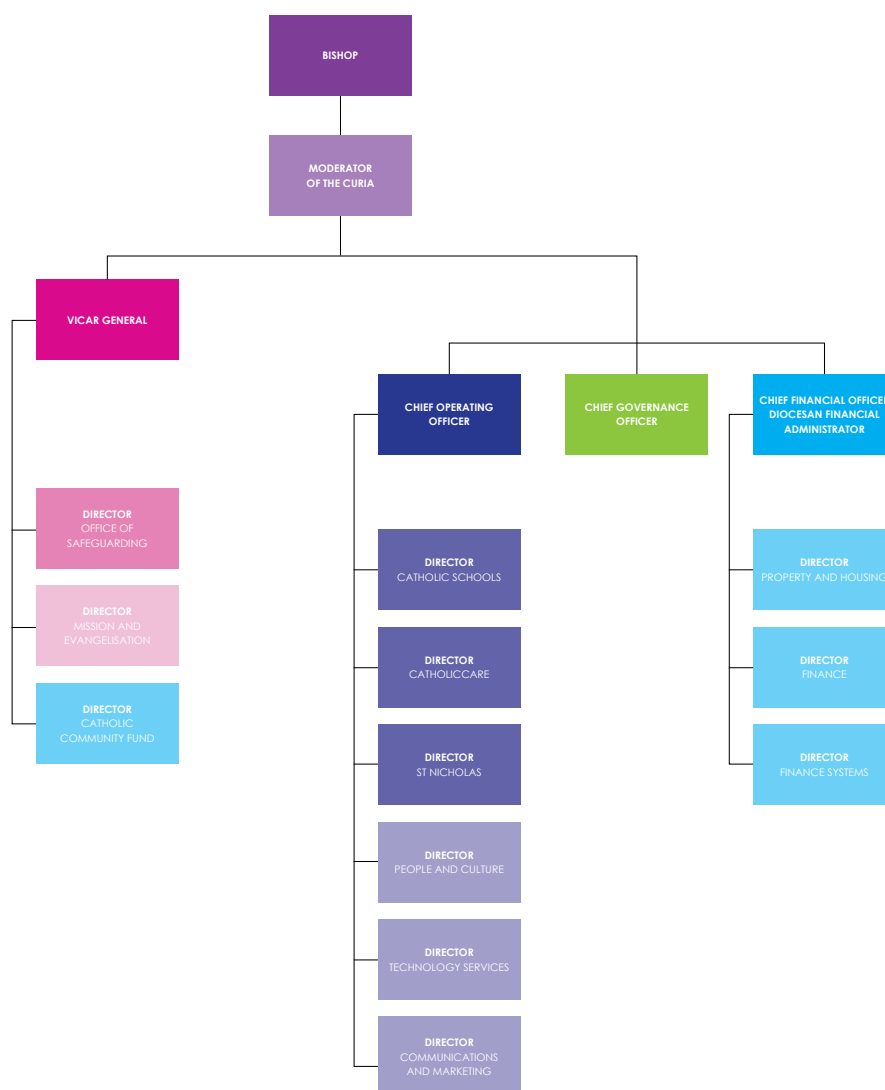
counselling and assessment sessions provided by CatholicCare



849

members

ORGANISATIONAL OVERVIEW



Agency	FTE	Part time/Casual/ Fixed-term employees	Volunteers
Diocese including St Nicholas, CCF and Parishes	691.8	654	1002
CatholicCare and Hunter Community Housing	124.4	89	309
Catholic Schools	2300.6	3290	4215
Total	3316.8	4033	5526

Agency	% female	% male	Other
Diocese including St Nicholas, CCF and Parishes	85	15	0
CatholicCare and Hunter Community Housing	84	16	0
Catholic Schools	80	20	0
Total	83	17	0

GOVERNANCE FRAMEWORK

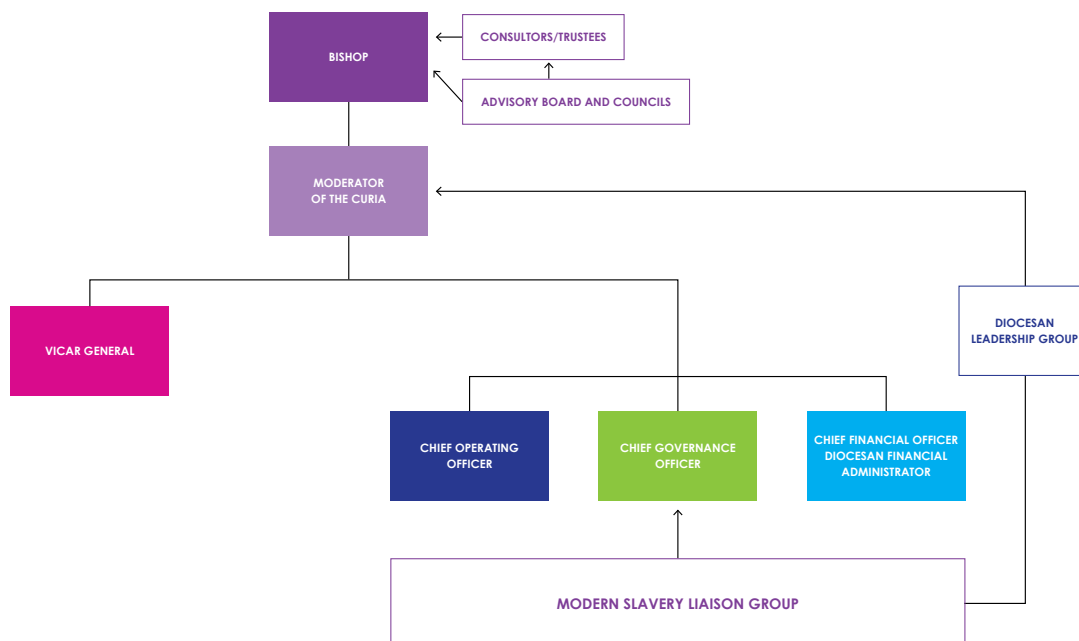
Overall responsibility for compliance with the Modern Slavery Act 2018 (Cth) sits with the Governance Department of the Diocese of Maitland-Newcastle. In mid-2025, the Diocese undertook governance reforms, transitioning from the former CEO-led structure to a Curia-based model to better integrate church structures and pastoral mission. Under this new structure, the Moderator of the Curia, appointed by the Bishop, provides overarching leadership, with the Vicar General, Chief Operating Officer, Chief Governance Officer and Chief Financial Officer reporting directly to the Moderator. This governance transition strengthened central oversight and reinforced a more integrated approach to compliance and risk management across diocesan operations.

Within this framework, the Governance Department continues to provide central coordination, policy oversight and assurance in relation to modern slavery risk management. As the Diocese's modern slavery program matures, a key focus remains on strengthening organisational capability to identify, assess and respond to modern slavery risks. This is achieved through the development of clear processes, practical tools

and guidance to support diocesan agencies and departments. The Governance Department also provides ongoing advice and support to senior leaders and key stakeholders across the Diocese to ensure a consistent and informed approach.

Responsibility for managing modern slavery risk is embedded within day-to-day operations and governance processes. Modern slavery risks, mitigation actions and program progress are monitored and reported through established governance channels, including regular reporting to the Diocesan Leadership Group.

To further enhance governance oversight, the Diocese has re-established and rebranded the Modern Slavery Liaison Committee (MSLC). The refreshed MSLC strengthens whole-of-Diocese coordination and reinforces collective responsibility for modern slavery risk management. Bringing together representatives from each diocesan agency and Curia department, the MSLC supports consistent practice, shared accountability and continuous improvement. The MSLC operates as an advisory body, is accountable to the Moderator of the Curia, and reports to the Diocesan Leadership Group.



OUR OPERATIONS

The Diocese of Maitland-Newcastle serves the Hunter and Manning regions which have a population of more than 148,000 Catholics.

We provide pastoral, educational, social welfare, and community development services through various agencies in a region extending from Lake Macquarie to Taree and as far inland as Merriwa and Murrurundi, including:

Catholic Schools, educating more than 21,450 students in our 58 schools.

CatholicCare Social Services Hunter-Manning provides care, counselling, clinical and support services along with community food programs to support children and vulnerable people.

Hunter Community Housing, a nationally registered Tier 2 Community Housing Provider offering supported independent living for young people transitioning from out of home care, as well as group homes, affordable housing, and a residential market program.

Parishes, the core structure of the Diocese, nourish the lives of the people in our region spiritually, pastorally, educationally and through outreach, social justice and community support initiatives. The Diocese has 37 parishes across 74 locations.

St Nicholas, provides high quality care and education for children aged up to five years across 12 locations, as well as Out of School Hours care in 30 locations. Alongside this care, St Nicholas Pathways program supports study and career options for early education.

Catholic Community Fund, assisting with the management of Diocesan finances and providing retail customers a range of investment products.



In addition to our agencies, we also have a diverse range of departments that form part of the Diocesan Curia to support our agencies serve the mission of the Diocese:

Mission & Evangelisation is an outward-looking team that shares the message of the Gospel with the contemporary world. It provides Diocese-wide leadership in accompaniment and resourcing for Catholic formation, training, and encounter. The three teams are: Mission & Evangelisation Partners, who accompany and support the Diocese and parish communities into the future; the Directorate who supports the Partners with shared leadership, resourcing, project planning, communications and administration; and Chaplains who provide accompaniment, pastoral and spiritual care to those in our unique part of the world.

The **Office of Safeguarding** promotes the safety and wellbeing of children and vulnerable adults in our Diocese through a range of programs and activities including:

- the provision of specialist advice and support
- conducting administrative inquiries into allegations of abuse against Diocesan workers
- supplying online and face-to-face safeguarding training for Diocesan workers
- supporting our parishes and Diocesan agencies to be compliant with Church and statutory safeguarding standards.

Shared Services brings together multiple specialists with varying backgrounds that offer resources and services to support the agencies and parishes. These Shared Services teams include: Administrative Services; Communications and Marketing; Data and Analytics; Finance; Governance; People and Culture; Property; and Technology Services.

148,000+
Catholic Population
Diocese of Maitland-Newcastle



OUR SUPPLY CHAIN

The Diocese of Maitland Newcastle procures a broad range of goods and services necessary to support its operations and service delivery across the Diocese. Procurement activities are conducted in accordance with relevant legislative requirements and the Diocese's procurement policies and procedures.

The Diocese's supply chains primarily operate within Australia and span a variety of sectors. Key procurement categories include building and construction services, facilities and property maintenance, furniture and office supplies, information and communications technology (ICT) hardware and services, food and beverage supplies, events and hospitality services, and waste management services.

These supply chains support the day to day operations of diocesan agencies and services, including education, early childhood education and care, social services, housing and community programs.

Some of these sectors are recognised as having an increased risk of modern slavery due to factors such as labour intensity, subcontracting and complex supplier arrangements, which informs the Diocese's ongoing approach to risk identification and management.

OPERATIONAL MODERN SLAVERY RISKS

The Diocese of Maitland Newcastle applies AS ISO 31000:2018 risk management principles, frameworks and processes to support consistent risk identification, assessment and decision making across its ministries, activities and operations. These principles underpin the Diocese's approach to identifying and managing modern slavery risks within its operations and supply chains.

The Diocese's core operations are primarily delivered in the education, social services and pastoral ministry sectors, which are generally regarded as lower risk environments for modern slavery. People and Culture functions, including recruitment and workforce management, are supported by systems and processes designed to comply with applicable labour, employment and immigration laws. Due diligence processes are in place to support fair and transparent recruitment practices, promote equal opportunity, and ensure appropriate remuneration and working conditions.

To support early identification of issues and ongoing assurance, the Diocese engages an independent and anonymous whistleblower service and maintains an internal audit program to monitor the effectiveness of its control environment. Since 2024, the Diocese has had a Whistleblower Procedure under its overarching Whistleblower Policy, setting out the mechanisms for reporting fraud, corruption, maladministration and misconduct.

Governance, systems and capability uplift

Building on prior years, the Diocese's modern slavery actions in 2025 focused on strengthening governance arrangements, systems and operational capability. Key initiatives included continued implementation and enhancement of financial management systems and People and Culture systems, strengthened risk assessment processes, targeted training and development for staff, and a review of procurement practices and supplier engagement approaches.

Improvements and enhancements to systems during the reporting period in the onboarding and recruitment module, learning management system for People and Culture, and procurement module supporting end to end purchasing processes within the finance system. The procurement module has improved controls over purchase approvals and strengthened the linkage between procurement activity, expenditure visibility and budget forecasting.

During 2025, governance frameworks across the Diocese were further strengthened through refinements to the Complaints and Feedback Framework, the Complaints Management Service, and the Risk Management Framework, aligned with enhancements to the Enterprise Risk Management System and associated training. The Policy Management Framework and Delegations Framework were also reviewed, including the introduction of a new diocesan wide platform for the Policy Library and the Delegations Register, and commencement of work on a refreshed Compliance Framework.

Operational risk focus – labour intensive services

Through participation in the Australian Catholic Anti Slavery Network (ACAN) program, the Diocese continues to prioritise engagement with labour intensive suppliers and operational areas that may present an elevated risk of modern slavery. These include the following labour supply chains:

Cleaning and security services

The cleaning and security sectors are recognised through the Australian Catholic Anti Slavery Network (ACAN) as presenting heightened modern slavery risks due to labour intensive work, extensive subcontracting arrangements, and reliance on temporary or migrant labour. Risk factors may include underpayment, excessive working hours, limited access to workplace rights information, and reduced worker visibility. Equipment and consumables used in these sectors are commonly manufactured overseas, including in jurisdictions with a higher prevalence of modern slavery risks.

To strengthen governance and reduce exposure to these risks, the Diocese of Maitland Newcastle has transitioned all cleaning arrangements across its sites to a whole of government contract, ensuring improved oversight, due diligence, and supplier accountability.

Facilities management and property maintenance

Facilities management and property maintenance services may present increased modern slavery risks where work is delivered through layered subcontracting and labour hire arrangements. These structures can reduce transparency and oversight of employment conditions, particularly where migrant or low skilled workers are engaged.

To improve governance and visibility over these risks, the Diocese of Maitland Newcastle utilises its own Property Services Agency, which manages facilities management and property maintenance for most of its properties. This centralised model strengthens oversight, reduces reliance on complex subcontracting chains, and enables more consistent due diligence practices.

Labour hire services

Labour hire services are recognised by ACAN as a higher-risk labour supply model due to the engagement of vulnerable worker cohorts and limited worker bargaining power. Risk indicators may include recruitment practices targeting temporary visa holders, international students or recent migrants; unclear contractual arrangements; excessive fees or deductions related to recruitment or migration; and practices that restrict worker mobility or access to support mechanisms. The Diocese of Maitland-Newcastle rarely uses labour hire companies for temporary appointments, with only one person engaged under such an arrangement in 2025. This limited use significantly reduces exposure to the higher-risk characteristics associated with labour hire models.

Waste management services

The waste and recycling sector is recognised as a higher risk environment due to hazardous working conditions,

reliance on subcontracting, and the frequent use of labour hire arrangements. Workers may include migrants and low skilled labour engaged in collection, sorting, and processing activities. Risk factors often mirror those present in cleaning and facilities services, including reduced oversight of employment conditions and subcontractor compliance.

To enhance governance and reduce exposure to these risks, the Diocese of Maitland Newcastle has transitioned all waste management arrangements across its sites to a whole of government contract established by the NSW Treasury Department under Veolia, ensuring strengthened oversight, due diligence, and supplier accountability.

Next Steps

Based on the identified operational and supply chain risk profile, the Diocese of Maitland Newcastle is continuing to strengthen its approach to modern slavery risk management. Priority actions are focused on improving supplier engagement within higher risk labour intensive sectors, strengthening due diligence and procurement controls, building workforce awareness and capability, and enhancing internal reporting and oversight mechanisms. These actions are integrated into the Diocese's governance, risk and compliance frameworks and are outlined in detail under Criterion 5 of this Statement.



SUPPLY CHAIN RISKS

The diversity and scale of diocesan agencies results in procurement across a wide range of goods and services and engagement with a significant number of suppliers. During the reporting period, the Diocese undertook a high level supply chain risk assessment of more than 3671 active suppliers to identify areas of potential modern slavery risk.

Suppliers were categorised by industry sector and assessed using recognised modern slavery risk indicators, including labour intensity, reliance on subcontracting or labour hire, use of migrant or temporary workers, and exposure to offshore manufacturing in higher risk jurisdictions. This assessment was designed to identify sectors with an elevated risk profile, rather than to identify incidents of modern slavery.

Based on this analysis, the Diocese considers the risk that it may cause or contribute to modern slavery in its operations and supply chains to be low. However, consistent with sector guidance, certain procurement categories have been identified as presenting a higher inherent risk of modern slavery due to their structural characteristics.

Supply chain risk categorisation

The following table summarises the relative modern slavery risk rating applied to key supplier categories:

High risk sectors

- Building and construction
- Cleaning and security services
- Facilities management and property maintenance
- Furniture and office supplies
- ICT hardware
- Events and entertainment
- Uniforms and personal protective equipment (PPE)
- Waste management
- Labour hire

These sectors are generally characterised by labour intensive work, extensive subcontracting arrangements and/or complex supply chains involving offshore manufacturing, which can reduce transparency and increase the risk of worker exploitation.

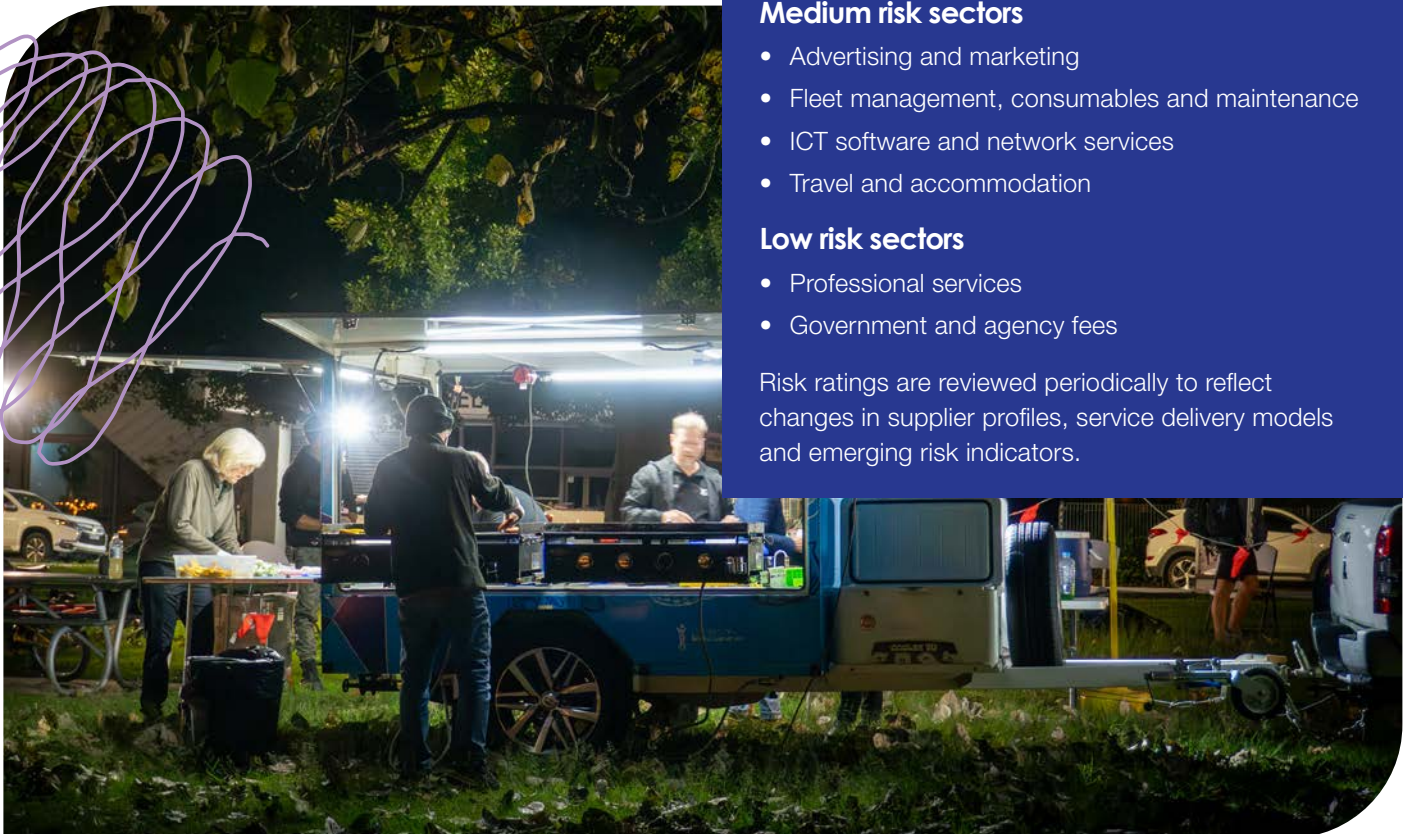
Medium risk sectors

- Advertising and marketing
- Fleet management, consumables and maintenance
- ICT software and network services
- Travel and accommodation

Low risk sectors

- Professional services
- Government and agency fees

Risk ratings are reviewed periodically to reflect changes in supplier profiles, service delivery models and emerging risk indicators.



HIGH RISK SUPPLY CHAINS

Following completion of the high level supplier risk assessment, the Diocese undertook a spend based analysis to better understand its exposure within procurement categories assessed as presenting a higher inherent risk of modern slavery. This analysis considered the nature of goods and services procured, labour intensity, reliance on subcontracting or labour hire, and the extent of offshore manufacturing or extended supply chains.

The table below outlines supplier categories assessed as higher risk and the proportion of total spend attributable to each category during the reporting period. The spend analysis has been used as one indicator to support the prioritisation of due diligence activities and supplier engagement, noting that spend level alone does not determine the presence of modern slavery.

Key high risk categories

Building and construction (35.45%)

Building and construction represents the highest proportion of spend within higher risk categories. This sector is recognised as presenting elevated modern slavery risks due to extensive subcontracting, labour hire arrangements, and reliance on low skilled and migrant labour. Risks may arise across demolition, landscaping, painting and specialist trade activities where visibility of employment conditions is reduced.

Facilities management and property management (17.93%)

Facilities management and property maintenance services involve ongoing labour intensive activities, often delivered through multiple subcontractors. Risk factors include reliance on temporary or migrant workers, fragmented service delivery models and limited transparency across supply chains.

Furniture and office supplies (5.22%) and ICT hardware (6.10%)

These categories present modern slavery risks primarily through offshore manufacturing supply chains. Furniture, office supplies and ICT hardware often rely on global production networks that may involve forced labour, exploitative working conditions or child labour, particularly in higher risk manufacturing jurisdictions.

Food and catering services (2.28%)

Food and catering services involve complex supply chains encompassing agriculture, food processing and hospitality labour. Risk drivers may include seasonal labour, migrant workers, low wages and limited oversight across upstream suppliers.

Cleaning and security services (3.30%)

Although representing a lower proportion of spend, cleaning and security services are recognised as higher risk sectors due to labour intensive work, subcontracting arrangements and reliance on vulnerable worker cohorts, including temporary visa holders.

Events and entertainment (1%)

Event related services may involve short term engagements, subcontracting and casual labour, presenting risks where worker conditions and employment arrangements are less visible.

Uniforms and PPE (0.53%), medical devices and supplies (0.46%) and waste management (0.24%)

These categories present modern slavery risks associated with offshore manufacturing, hazardous work environments and subcontracting arrangements. Waste management services may involve migrant or low skilled labour engaged through labour hire firms.

Finance and investments (7.16%)

While the inherent risk of modern slavery within financial services is generally lower, exposure exists through investment portfolios and financed entities. This category is monitored to support responsible investment practices and alignment with ethical investment principles.

Interpreting spend and risk

The Diocese recognises that higher spend does not necessarily correlate with a higher likelihood of modern slavery occurring. Rather, this analysis is used to identify areas of greater exposure and complexity, enabling a risk based and proportionate approach to managing modern slavery risks across supply chains.

MEDIUM AND LOW RISK SUPPLY CHAINS

In addition to higher risk categories, the Diocese has identified a number of procurement categories assessed as presenting medium or lower inherent modern slavery risks. These risk ratings reflect the nature of the goods and services procured, typical labour models, level of regulatory oversight, and the transparency and stability of supplier arrangements.

Spend analysis has been used as a supporting indicator to inform prioritisation, recognising that modern slavery risks may still arise in medium and lower risk categories and warrant ongoing monitoring.

Medium risk supply chains

Medium risk categories generally involve a combination of service delivery and supply chain complexity, with some exposure to subcontracting, offshore service delivery or extended global supply chains. While these sectors are often subject to regulatory oversight, reduced visibility or indirect labour engagement may increase vulnerability in certain circumstances.

Advertising and marketing (0.56%)

Advertising and marketing services may involve outsourced production, creative services or digital content development, including engagement of contractors or offshore service providers. Risks may arise where labour standards and working conditions are less transparent.

Fleet management, consumables and maintenance (1.31%)

This category includes vehicle servicing, repairs and associated consumables, which may involve subcontracted labour and supply chains for parts and materials.

ICT software and network services (4.10%)

ICT software and network services may include offshore programming, application development or support services. Risks are typically associated with outsourced service models and extended global labour supply chains.

Travel and accommodation (1.99%)

Travel and accommodation services can involve complex labour supply chains across hospitality and tourism sectors, with risks linked to casualised labour, migrant workers and subcontracted services.

Utilities (1.18%)

Utilities include electricity, water and telecommunications services. These sectors generally operate within regulated environments; however, upstream risks may exist in relation to infrastructure development, resource extraction or outsourced service delivery.

Low risk supply chains

Low risk categories are generally characterised by strong regulatory oversight, professional accountability mechanisms and established market practices. These suppliers typically operate within Australia and involve lower exposure to vulnerable labour cohorts or extended global supply chains.

Government and agency fees (5.02%)

Payments to government agencies, statutory bodies and regulators are assessed as low risk given the nature of the transactions and regulatory environment.

Professional services (5.81%)

Professional services such as legal, accounting, auditing and consultancy services operate under professional standards and regulatory frameworks, reducing inherent modern slavery risk.

Licences and memberships (0.18%)

Fees associated with licences and professional memberships present limited exposure to modern slavery risks.

Ongoing monitoring

While these categories are assessed as medium or low risk, the Diocese recognises that modern slavery risks can arise across all supply chains. Accordingly, risk ratings are reviewed periodically, and suppliers across all categories remain subject to broader governance, procurement and compliance controls.

HIGH RISK SUPPLY CHAIN PERCENTAGE SPEND

35.45%

Building and construction

**3.30%**

Cleaning and security services

**17.93%**Facilities management
and property management**2.28%**

Food and catering services

**7.16%**

Finance and investments

**1%**

Events and entertainment

**6.10%**

ICT hardware

**0.53%**

Uniforms and PPE

**5.22%**

Furniture and office supplies

**0.46%**

Medical devices and supplies

**0.24%**

Waste management



ACTIONS TAKEN TO MANAGE RISK

During the 2025 reporting period, the Diocese of Maitland Newcastle focused on strengthening organisational understanding of modern slavery risks across its operations and supply chains and enhancing its capacity to address and mitigate those risks through improved governance, systems, supplier engagement and workforce capability.

Strengthening systems, governance and procurement controls

The continued rollout of the TechnologyOne (TechOne) platform has significantly strengthened procurement, financial and supplier management processes across the Diocese. Improvements to supplier data, expenditure visibility and approval workflows have enhanced the Diocese's ability to identify and manage supply chain risks, including modern slavery risks. These system improvements are being progressively extended, including within education and early childhood related procurement activities.

Modern slavery contract clauses continue to be embedded as a standard requirement in all new supplier contracts and contract renewals, reinforcing supplier obligations and expectations. These controls are supported by broader governance reforms implemented during 2025, including updates to the Delegations Framework, Risk Management Framework, Complaints Framework, and rollout of a diocesan wide Policy Management System and Delegations Register.

Supplier engagement through ACAN and Sedex

The Diocese is an active member of the Australian Catholic Anti Slavery Network (ACAN), a collaborative initiative comprising more than 95 Catholic entities nationally across education, finance, health, aged care and social services. Through ACAN, the Diocese participates in a coordinated program to assess and address modern slavery risks in shared supply chains.

During the reporting period, the Diocese participated in the ACAN supplier engagement program, which involved:

- identifying suppliers in higher risk procurement categories using the ACAN Procurement Taxonomy;
- inviting suppliers in these categories to complete the ACAN Supplier Survey;
- supporting suppliers to join Sedex – Supplier Ethical Data Exchange, where appropriate; and
- assessing supplier responses to identify gaps, training needs and opportunities to strengthen risk management practices.

As part of this process, a significantly larger cohort of suppliers participated in the ACAN Supplier Survey compared with previous years. A notable portion were already engaged through platforms such as Sedex, and many completed the Sedex Self-Assessment Questionnaire (SAQ). ACAN Program Managers analysed SAQ outcomes and collaborated with suppliers to strengthen their practices, including building capability and enhancing risk management approaches.

The ACAN program also identified common suppliers shared across multiple Catholic entities, increasing leverage in supplier engagement and reducing duplication across diocesan systems.

Use of Sedex to manage supply chain risks

Since mid 2021, the Diocese has held membership of Sedex, a global not for profit platform supporting ethical and sustainable supply chain practices. Sedex enables enhanced transparency, collaboration and information sharing with suppliers and buyers.

Through Sedex, the Diocese is able to:

- identify and monitor modern slavery and labour rights risks within supplier profiles;
- validate inherent risk against supplier reported management practices;
- improve visibility into upstream supply chains;
- support screening of new suppliers during tender and onboarding processes; and
- monitor and report on supplier progress over time.

ACAN Program Managers continue to support onboarding of diocesan suppliers to Sedex and facilitate access to relevant training and resources.

Supplier capability building and engagement

Supplier engagement and education formed a key part of the Diocese's 2025 modern slavery response. ACAN supplier webinars supported suppliers to build understanding of:

- the Modern Slavery Act and business relevance;
- Catholic buyer expectations;
- access to ACAN training resources; and
- Sedex supplier membership and reporting requirements.

Suppliers were provided with clear, consistent guidance on participation steps, including completion of ACAN surveys, participation in webinars, registration with Sedex, and access to ACAN e learning modules.



Workforce awareness and capacity building

The Diocese continued to build internal capability and awareness through training and communication initiatives. Modern slavery training is available to all staff via mnpeople, the Diocese's learning management platform, including the ACAN Modern Slavery 101 module. Modern slavery information is incorporated into staff induction processes, alongside information on the independent whistleblower service.

The Diocese's Modern Slavery Liaison Officer(s) participated in ACAN teleconferences, workshops and peer collaboration initiatives throughout the reporting period to support continuous improvement and shared learning. Modern slavery updates were provided regularly to diocesan leadership groups to support oversight, accountability and informed decision-making.

In addition to internal capability-building, the Diocese actively promotes awareness and education within the broader community. Each year, the Diocese holds a Feast Day celebration in honour of Saint Josephine Bakhita, the

Patron Saint of Victims of Modern Slavery and Human Trafficking. This event provides an opportunity for prayer and reflection, asking for God's freedom and justice for all who suffer because of human trafficking, slavery and persecution, and for their dignity, respect and peace to be restored.

The Diocese also provides information and educational resources about Saint Josephine Bakhita through its dedicated St Josephine Bakhita Working Party Group, which engages with schools and parish communities to raise awareness of modern slavery and promote Catholic Social Teaching on human dignity and justice.

Continuous improvement

The Diocese recognises that managing modern slavery risk is an ongoing process. Supplier expenditure analysis and information gathered through ACAN engagement continues to inform prioritisation of future actions as part of a five year program to deepen understanding of supply chains, strengthen supplier relationships and embed modern slavery risk management into business as usual practices.

MODERN SLAVERY ACTION PLAN

The Diocese of Maitland Newcastle has continued to progress its modern slavery maturity journey by strengthening management systems, enhancing governance practices, undertaking risk assessment activities, building workforce capability, and deepening supplier engagement. These focus areas align with the Diocese's risk based approach and its commitment to continuous improvement in managing modern slavery risks across operations and supply chains.

Operating context

During the 2025 reporting period, external economic, geopolitical and environmental factors continued to shape the operating environment. Cost of living pressures affected parish communities and service delivery costs, particularly within building, construction and facilities related services. A tight labour market and ongoing workforce pressures also influenced the availability of skilled and qualified staff across education and early education services. These contextual factors reinforced the importance of strong governance, prudent procurement and informed supplier engagement to mitigate modern slavery risks.

Strengthening governance and management systems

Internally, the Diocese implemented and enhanced several diocesan wide governance frameworks to support consistent practice and alignment across agencies. Key initiatives included:

- continued enhancement of onboarding and recruitment systems to support compliant workforce practices including implementation of a new recruitment and selection procedure;
- improvements to the learning and development management system to support staff capability and awareness;
- ongoing enhancements to the Enterprise Risk Management System to strengthen risk identification, reporting and oversight;
- introduction of a diocesan wide policy and delegation management system to centralise governance instruments and improve accessibility;
- rollout of a centralised procurement system to support supplier engagement, strengthen financial controls, and improve monitoring of budget forecasts and expenditure; and

- review of the Procurement Framework and supplier engagement practices, including completion and publication of a new Procurement and Probity Policy.

As part of continuous governance improvement, the Diocese also reviewed and refreshed its Modern Slavery Framework and re established the Modern Slavery Liaison Committee to strengthen coordination, oversight and accountability across diocesan agencies. In parallel, People and Culture, Governance and Senior Leadership commenced a diocesan wide review of work related policies to ensure alignment with legislative obligations, contemporary standards and risk management expectations.

Capability and program continuity

While workforce and resourcing pressures required adjustments to the pace of some initiatives during 2025, the Diocese continued to implement its five year modern slavery roadmap and maintained a focus on service excellence, quality assurance, compliance monitoring and capability development.

During this period, changes in procurement resourcing presented an opportunity for the Diocese to consolidate existing improvements, reflect on the effectiveness of current arrangements, and assess how best to leverage available systems and governance frameworks. This review period supported a more deliberate and strategic consideration of the systems, procedures and resourcing models required to effectively identify and mitigate modern slavery risks across procurement activities.

This reflective phase has informed broader strategic planning and the development of future priorities, including consideration of how procurement governance, system functionality and roles can best support a risk based approach to supplier due diligence and engagement as the Diocese transitions to its next phase of program maturity.

The Diocese is concluding its original five year modern slavery plan and is commencing planning for a new roadmap covering 2026–2030. This next phase will build on existing foundations, lessons learned and program maturity, with a focus on strengthening supplier due diligence, enhancing data driven risk analysis, deepening workforce and supplier capability, and embedding modern slavery risk management into business as usual governance and procurement practices.

2026 PRIORITIES

Building on the foundations established during the 2025 reporting period, the Diocese of Maitland Newcastle will continue to strengthen its approach to identifying, assessing and addressing modern slavery risks across its operations and supply chains in 2026.

Key priorities for the next reporting period include embedding modern slavery risk management more deeply into business as usual governance, procurement and contract management practices, with a particular focus on higher risk labour intensive and manufacturing supply chains. This includes strengthening risk based due diligence processes, supplier engagement and contract controls within priority procurement categories.

The Diocese will continue to leverage participation in the Australian Catholic Anti Slavery Network (ACAN) and the use of Sedex to enhance supplier transparency, validate inherent risks against supplier practices, and support continuous improvement across shared supply chains.

A further priority for 2026 will be strengthening the measurement and evaluation of the effectiveness of existing controls and actions, to support informed decision making and continuous improvement. This includes improving data driven insights, monitoring supplier progress over time, and refining governance reporting mechanisms.

The Diocese will also focus on building targeted capability within key operational roles, particularly in procurement, property, People and Culture and governance functions, to ensure staff are equipped to identify modern slavery risks and respond appropriately.

As the Diocese concludes its initial five year modern slavery roadmap, a refreshed 2026–2030 Modern Slavery Action Plan will be developed to build on existing achievements, lessons learned and increasing program maturity, and to support a proportionate, risk based and sustainable approach to modern slavery risk management into the future.



REMEDICATION

The Diocese of Maitland Newcastle is committed to providing appropriate, timely and effective remedy where people are identified as having been impacted by modern slavery, in accordance with the United Nations Guiding Principles on Business and Human Rights, the Modern Slavery Act 2018 (Cth), and relevant Australian laws.

Consistent with Commonwealth guidance, the Diocese recognises that access to remedy is a fundamental element of a responsible response to modern slavery risks. Remedy focuses on addressing actual harm to individuals, restoring their rights and dignity where possible, and taking steps to prevent recurrence through improved controls and practices.

Remediation approach

The Diocese's remediation approach is guided by the following principles:

- ensuring the safety, wellbeing and protection of people impacted by modern slavery;
- adopting a human rights based approach that prioritises the needs and agency of individuals;
- ensuring that any actions taken are informed, voluntary and undertaken with the full knowledge and consent of the person impacted; and
- maintaining confidentiality and dignity throughout the process.
- Where concerns or incidents are identified, the Diocese seeks to respond promptly through appropriate investigation, escalation and engagement with relevant support services, aligned to the nature and severity of the risk.

Access to independent support through ACAN

Through participation in the Australian Catholic Anti Slavery Network (ACAN), diocesan agencies and parishes have access to independent specialist advice and support provided by Domus 8.7. This support framework strengthens the Diocese's remediation capability by providing clear pathways for escalation, guidance and coordinated responses.

Agencies and parishes may refer matters where modern slavery is suspected or identified to obtain advice and support on appropriate responses, including engagement with government agencies, victim support organisations and other relevant stakeholders.

Role of Domus 8.7

Domus 8.7 operates as a confidential and independent service within the ACAN program and supports Catholic entities to respond effectively to modern slavery risks. Its role includes:

- providing guidance and advice to entities that identify or suspect modern slavery;
- supporting coordination with government bodies and specialist victim support services;
- offering a confidential, independent grievance mechanism for reporting suspected incidents;
- supporting the development of internal capability to manage complex modern slavery and human rights issues; and
- facilitating practical, timely and survivor centred responses.

This framework supports the Diocese's commitment to Catholic Social Teaching and the protection of human dignity, while strengthening its capacity to respond appropriately should modern slavery risks be identified in its operations or supply chains.



BEYOND 2026

As the Diocese of Maitland Newcastle continues to strengthen its approach to identifying, assessing and addressing modern slavery risks, it will build on the foundations established through its initial five year roadmap and progressively embed modern slavery risk management into business as usual governance, procurement and operational practices.

Beyond 2026, the Diocese's focus will shift toward deeper integration, stronger measurement of effectiveness, and sustained engagement with higher risk supply chains, guided by a proportionate, risk based approach. The following workstreams outline the Diocese's intended areas of focus over the next phase of its modern slavery program.

WORKSTREAM	FUTURE FOCUS
Governance	Leadership and Senior Management oversight of modern slavery risk management will continue, with performance, priorities and progress reported through established governance channels. Modern slavery considerations will remain integrated into enterprise risk management and strategic decision making.
Organisational commitment	Senior leadership will continue to champion the Diocese's commitment to addressing modern slavery risks and support the ongoing implementation of its modern slavery program across agencies.
Business systems	Modern slavery risk management will continue to be embedded within key systems, policies and processes, including risk management, procurement, finance, workforce and supply chain systems.
Actions and standards	Risk based actions, standards and expectations will continue to be applied to priority supply chains, with progress monitored and reported through existing governance and assurance mechanisms.
Monitoring and reporting	The Diocese will continue to collect, analyse and report information on modern slavery risks and actions as part of its continuous improvement and assurance processes, informing future priorities and decision making.
Awareness and accountability	Targeted awareness raising and role based guidance will continue to support staff understanding of modern slavery risks, responsibilities and escalation pathways.
Policies and accountability frameworks	Modern slavery commitments will remain integrated into relevant policies, position descriptions and accountability frameworks, with expectations reflected in recruitment, procurement and contractor engagement practices.
Training and capability	Targeted training and capacity building initiatives will continue to support staff and key stakeholders to identify and respond to modern slavery risks relevant to their roles.
Labour hire and outsourcing	The Diocese will continue to apply and strengthen due diligence and engagement with labour hire and outsourced service providers, particularly in higher risk labour intensive sectors.
Procurement and supply chains	Procurement policies, processes and guidance will continue to be refined to support risk based supplier engagement, due diligence and contract management in higher risk procurement categories.
Contract management	Contract management practices will continue to incorporate modern slavery expectations and review mechanisms for higher risk contracts, supporting accountability and continuous improvement.
Screening and traceability	The Diocese will continue to strengthen supplier screening and information gathering practices to improve supply chain visibility where practicable, particularly within priority risk categories.
Supplier engagement	Ongoing engagement with suppliers will continue through participation in ACAN and the use of tools such as Sedex, supporting collaboration, transparency and shared improvement.
Monitoring and corrective action	Supplier performance and risk indicators will continue to be monitored using a range of tools, with engagement and corrective action undertaken where issues or gaps are identified.
Risk framework	Human rights and modern slavery risks will remain integrated within broader risk assessment and assurance processes, with periodic review of control effectiveness to support continuous improvement.

MEASURING EFFECTIVENESS

The Diocese of Maitland Newcastle measures the effectiveness of its actions to assess and address modern slavery risks through a combination of qualitative and quantitative indicators. These measures support ongoing evaluation of governance arrangements, workforce capability, supplier engagement and remediation pathways, and inform continuous improvement of the Diocese's modern slavery program.

Frameworks and maturity assessment

During the reporting period, the Diocese undertook an initial assessment of its approach to managing modern slavery risks across key domains, including management systems, enterprise risk management, People and Culture functions, stakeholder and supplier engagement, and procurement and supply chains.

As part of its participation in the Australian Catholic Anti Slavery Network (ACAN), the Diocese commenced completion of the ACAN Entity Profile and associated maturity assessment. This marks a transition from an initial foundation building phase to a more embedded approach, with modern slavery risk management increasingly integrated into business as usual governance, systems and processes.

Use of metrics and indicators

The Diocese has developed a suite of metrics to provide a consistent and objective basis for assessing the effectiveness of its actions over time. These indicators capture both activity based outputs and changes in engagement and capability, supporting an understanding of program reach, areas of progress and opportunities for improvement.

Metrics are reviewed regularly and are used to:

- assess the uptake and reach of staff training and awareness activities;
- monitor supplier engagement in higher risk categories;
- track participation in ACAN and Sedex initiatives; and
- assess the responsiveness and accessibility of grievance and remediation pathways.

Supplier engagement and risk visibility

During the reporting period, supplier engagement with the ACAN Supplier Survey increased significantly, reflecting stronger participation across a broad range of procurement categories. Suppliers operating in higher risk categories were invited to join Sedex and complete a Self Assessment Questionnaire (SAQ), further enhancing the Diocese's ability to assess and monitor supplier reported management practices.

A substantially larger group of suppliers is now connected to the Diocese through Sedex compared with earlier reporting periods, providing improved visibility of risk indicators within priority supply chains. This expanded engagement has deepened the Diocese's understanding of supplier practices and strengthened oversight of potential modern slavery risks.

In addition, many suppliers participated in ACAN-led capacity building webinars, supporting improved awareness of modern slavery risks, legislative obligations, and supplier responsibilities.

Workforce capability and governance engagement

Effectiveness is also monitored through internal capability indicators, including staff participation in modern slavery training, Modern Slavery Liaison Committee activity, and the integration of modern slavery risk considerations into governance and assurance processes. These indicators support ongoing assessment of organisational awareness, accountability and leadership oversight.

Grievance and remediation pathways

The Diocese monitors the effectiveness of its grievance and remediation mechanisms through reporting on access to and use of available channels, including whistleblower mechanisms and Domus 8.7 referrals. During the reporting period, no contacts, referrals or remediation cases related to modern slavery were reported through Domus 8.7.

The absence of reported cases does not in itself indicate an absence of risk. Rather, the Diocese recognises that ongoing awareness raising, accessible reporting pathways and trusted support mechanisms are critical to ensuring concerns are identified and addressed where they arise.

Continuous improvement

Effectiveness measures are reviewed periodically to ensure they remain appropriate to the Diocese's evolving risk profile and program maturity. Insights gained through supplier data, system enhancements, audits and ACAN collaboration are used to refine controls, prioritise actions and inform future planning.

The Diocese will continue to strengthen its approach to measuring effectiveness as its modern slavery program matures, with a focus on improving data quality, targeting measures to higher risk areas and strengthening the link between identified risks and mitigation outcomes.



PROCESS OF CONSULTATION WITH ENTITIES OWNED OR CONTROLLED BY THE DIOCESE

The Diocese of Maitland Newcastle consults with entities it owns or controls through established governance, coordination and engagement mechanisms to support a consistent and coordinated approach to managing modern slavery risks across the Diocese.

The Diocese has established and re established a Modern Slavery Liaison Committee (MSLC) comprising representatives from diocesan agencies and Curia departments. The MSLC provides a key forum for consultation, information sharing and collaboration on the development, implementation and ongoing refinement of the Diocese's Modern Slavery Action Plan. Through this forum, agencies contribute to identifying operational and supply chain risks, sharing insights, and supporting consistent application of modern slavery policies and procedures across the Diocese.

The activities set out in the Modern Slavery Action Plan are designed to embed the management of modern slavery risks into the day to day operations of diocesan agencies. Consultation occurs through agency representation on the MSLC, participation in ACAN initiatives, and engagement in governance and risk management processes that apply across the Diocese.

In addition, consultation and engagement are supported through communication and capability building initiatives. A refreshed and updated ACAN Modern Slavery 101 training module has been embedded within the Diocese's learning management system and is available to all staff via self enrolment. This supports consistent awareness raising and understanding of modern slavery risks and expectations across diocesan entities. Targeted communications and resources have also been implemented to promote awareness and support improved practices for identifying, assessing and managing modern slavery risks across the Diocese.

OTHER

In addition to the actions outlined in this Statement, the Diocese of Maitland Newcastle continues to engage with broader sector initiatives and shared learning opportunities to strengthen its understanding of modern slavery risks and emerging trends.

Throughout the reporting period, the Diocese actively participated in the Australian Catholic Anti Slavery Network (ACAN) webinar series. These regular sessions provided timely updates on legislative developments, emerging risks, sector insights and practical tools to support effective modern slavery risk management. Topics included the rollout of new ACAN systems,

updates to training and e learning resources, supplier engagement and due diligence practices, and guidance on Sedex and reporting expectations.

Participation in these forums supports continuous professional development, knowledge sharing and alignment with best practice approaches across Catholic entities nationally. Insights gained through ACAN engagement inform the Diocese's ongoing program development, workforce capability building and supplier engagement activities.

A summary of ACAN webinar topics attended during the reporting period is provided below.

2025	ACAN WEBINAR TOPICS
Feb	Modern Slavery Updates - New online system introduced called ROTA
Mar	Modern Slavery Updates
Apr	Modern Slavery Updates - e-Learning module updated and Domus 8.7 Presentation
May	Modern Slavery Updates – Guest Speaker Natasha Murphy - Approved Employer insight - Pacific Australia Labour Mobility Scheme
June	Modern Slavery Updates
July	Modern Slavery Updates
Aug	Modern Slavery Updates - Supplier Engagement Update
Sep	Modern Slavery Updates - continued rollout of ROTA: Company Profile now available for completion
Oct	Modern Slavery Updates - Help with Sedex: Guest Speaker Alex Walrut
Nov	Modern Slavery Updates
Dec	Modern Slavery Updates - 2025 Statements timeline





St Vincent de Paul Society
NSW
good works

2025 MODERN SLAVERY STATEMENT

1 JANUARY — 31 DECEMBER 2025

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Acknowledgement of country

We acknowledge Aboriginal and Torres Strait Islander peoples, as the Traditional Custodians of this land, with deep respect. May Elders, past and present, be blessed and honoured. May we join together and build a future based on compassion, justice, hope, faith and reconciliation.

St Vincent de Paul Society NSW (ABN: 91 161 127 340), 2C West Street, Lewisham NSW 2049, www.vinnies.org.au/nsw
Trustees of the Society of St Vincent de Paul (NSW) (ABN: 46 472 591 335), 2C West Street, Lewisham NSW 2049, www.vinnies.org.au/nsw
St Vincent de Paul Housing (ABN: 41 158 167 483), 2C West Street, Lewisham NSW 2049, www.vinnies.org.au/svdp-housing-australia

Foreword

Modern slavery is an issue that touches us all through the goods and services we buy every day. In 2021, there were more than 40,000 people experiencing modern slavery in Australia – which was an increase from 15,000 people reported to have been experiencing modern slavery in Australia in 2018. The 2023 Global Slavery Index ('GSI') reported that in 2021 an estimated 50 million people were experiencing modern slavery globally on any given day, with approximately 27.6 million people in forced labor and 22 million people in forced marriages.

Therefore, modern slavery poses a significant challenge to justice worldwide. Modern slavery practices fundamentally conflict with the mission, vision, and values of the St Vincent de Paul Society NSW. The scope of modern slavery, both in Australia and internationally, requires increased awareness and targeted action. At the St Vincent de Paul Society NSW we have continued to enhance our understanding of, and strategies to address, this injustice.

The Rule of the Society of St Vincent de Paul calls its members to prioritise the needs of the poorest of the poor and those who are most rejected by society. As an organisation, we work to shape a more just and compassionate society. We are committed to responding to the needs of victims and survivors of modern slavery and dismantling the structures that cause and create the risk of modern slavery. Our

aim is to accompany people on their journeys to security, stability, and community connection. We do this by offering a 'hand up' to people in the most disadvantaged and hard-to-reach communities.

The obligations and commitments set out in this 2025 Modern Slavery Statement are a key focus of attention for our members, volunteers, and employees. In NSW, we have over 12,500 pairs of eyes and ears to identify the victims of modern slavery and hear their cries for assistance. In 2025, we have deepened our engagement with suppliers to assess and address modern slavery risks and continued our participation in the Australian Catholic Anti-Slavery Network (ACAN) to support this most important work.

In a spirit of charity and justice, we continue to be vigilant in our efforts to identify the risk of modern slavery practices in our operations and supply chains, both in Australia and overseas. We are alert to any indicators of modern slavery we may encounter so we can effectively respond to victim-survivors and prevent further exploitation. By fostering an environment of awareness and intervention, we contribute to a collective effort to end modern slavery practices and restore dignity to those adversely affected by them.

Approval and Signature

This Modern Slavery Statement was approved by the principal governing body of the St Vincent de Paul Society NSW as defined by the Modern Slavery Act 2018 (Cth) ("the Act") on 25 June 2026. This Modern Slavery Statement is signed by a responsible member of St Vincent de Paul Society NSW as defined by the Act.



Peter Houweling

President, The Trustees of the Society
of St Vincent de Paul (NSW)



Richard Stewart

Chair, St Vincent de Paul
Society NSW



Anne Stanfield

Chair, St Vincent de Paul
Housing

CRITERION 1

About the St Vincent de Paul Society NSW

About us

The St Vincent de Paul Society NSW is a lay Catholic member-led organisation that has been assisting people experiencing disadvantage and hardship in NSW for over 140 years.

The Society was founded in Paris by a 20-year-old university student named Frederic Ozanam in 1833 who, with a group of his friends, wanted to alleviate the poverty and disadvantage that he saw around him in post-revolutionary France. Leading by example, and with boundless energy, Frederic started what is now a worldwide movement in just 20 short years. In 1881, the Society established its first formal presence in Sydney, NSW.

We have over 12,500 members and volunteers and 1550 employees across the state, who give tirelessly of their time. In total, we have close to 400 local member networks, referred to as Conferences, present in, and assisting, local communities across NSW.

Our members, volunteers and employees help people experiencing disadvantage by offering them material support. This includes food parcels and vouchers, financial help with energy bills and other debt, budget counselling, obtaining school items for children, and providing items such as furniture, clothing, bedding, and other household items. We also offer vital ongoing emotional support and referral services, as they are needed.

In addition, we are a leading provider of frontline services, with over 100 local services across the state. These frontline services deal with a range of issues including homelessness, domestic and family violence, disability, mental health, youth wellbeing, refugee and migrant inclusion, rehabilitation and recovery from drug and alcohol misuse.



Our Mission

The St Vincent de Paul Society is a lay Catholic organisation that aspires to live the gospel message by serving Christ in the poor with love, respect, justice, hope, and joy, and by working to shape a more just and compassionate society.

Our Vision

The Society aspires to be recognised as a caring Catholic charity offering “a hand up” to people in need. We do this by respecting their dignity, sharing our hope, and encouraging them to take control of their own destiny.

Our Aspiration

An Australia transformed by compassion and built on justice.

Our Key Values

Commitment – Loyalty in service to our mission, vision and values.

Compassion – Welcoming and serving all with understanding and without judgement.

Respect – Service to all regardless of creed, ethnic or social background, health, gender or political opinions.

Integrity – Promoting, maintaining and adhering to our mission, vision and values.

Empathy – Establishing relationships based on respect, trust, friendship and perception.

Advocacy – Working to transform the causes of poverty and challenging the causes of human injustice.

Courage – Encouraging spiritual growth, welcoming innovation and giving hope for the future.

HIGHLIGHTS OF 2024/25



Our members supported close to
105,000 PEOPLE
with food, clothing, household bills, material
assistance, advocacy and emotional support



11,800 PEOPLE
were supported by our Vinnies Services
across Homelessness and Housing,
Health, and Disability and Inclusion



\$15.1 MILLION
in financial and material aid was provided
to people in need through our members



Our Vinnies Vans assisted
115,000 PEOPLE
across the state



We celebrated
20 YEARS
of the Vinnies CEO Sleepout



VINNIES FINDS LAUNCHED
bringing the Vinnies Shops
experience online

CRITERION 2

Our Structure, Operations and Supply Chain



Head Office

The head office of the St Vincent de Paul Society NSW is located at 2C West Street, Lewisham NSW Australia 2049. This office houses the organisation's executive leadership, governance, finance, procurement, risk and compliance functions, and supports the coordination of services delivered across NSW.

Organisational Structure

The St Vincent de Paul Society in NSW is comprised of four entities:

- The NSW State Council of the Society of St Vincent de Paul ('State Council'), which is an unincorporated association that governs the membership of the Society of St Vincent de Paul, comprised of democratically elected and appointed members of the Society of St Vincent de Paul in NSW.
- The Trustees of the Society of St Vincent de Paul (NSW) ('Trustees'), which is a body corporate under the Roman Catholic Church Communities' Lands Act 1942 (NSW): Schedule 2. The Trustees are comprised of members of the State Council.

- The St Vincent de Paul Society NSW ('Company'), which is a public company limited by guarantee incorporated under the Corporations Act 2001 (Cth).
- St Vincent de Paul Housing ('SVDP Housing'), which is a special purpose vehicle through which it manages the maintenance and service provision of over 502 social and affordable housing units constructed through the NSW Government's Social and Affordable Housing Fund.

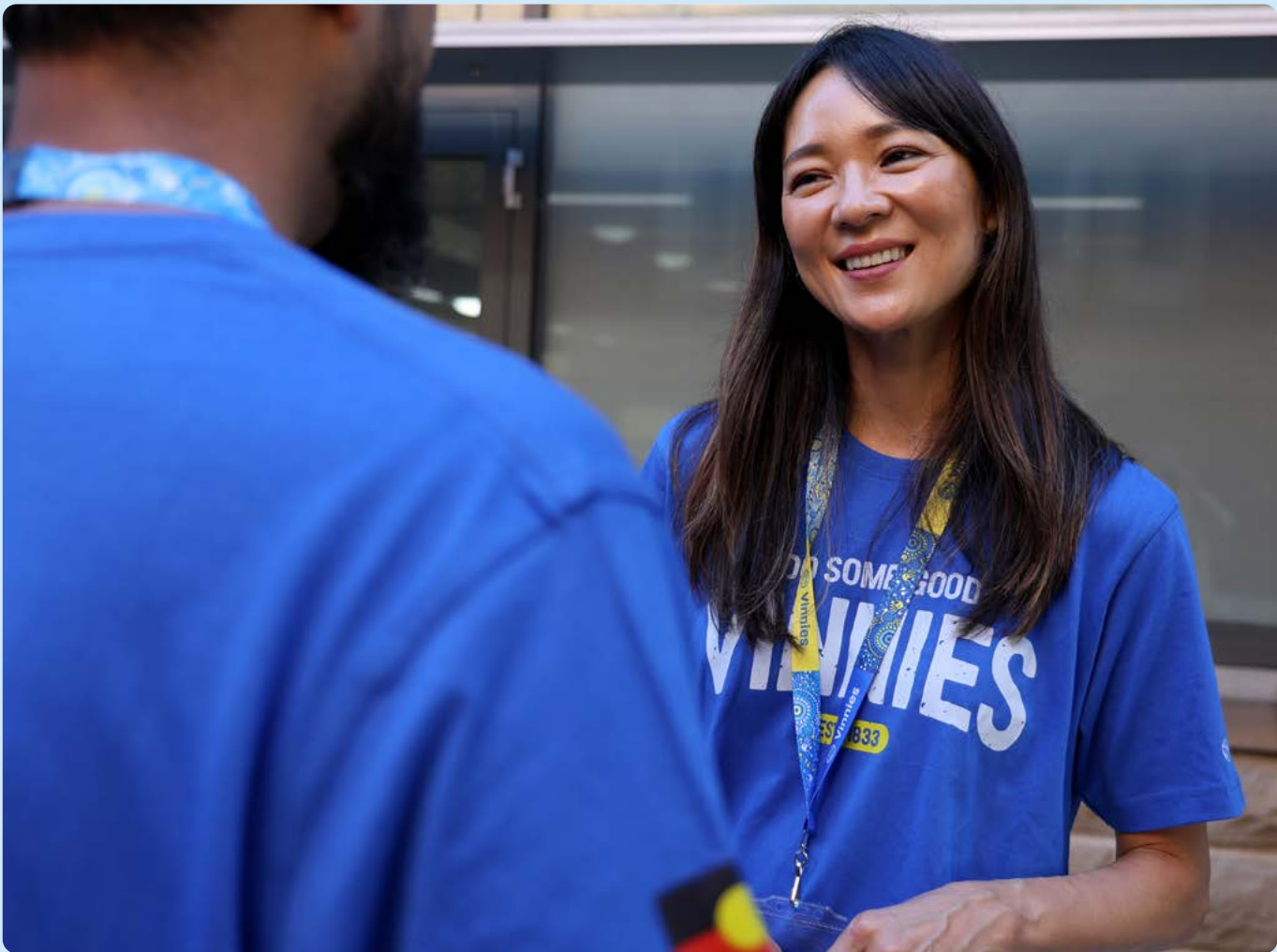
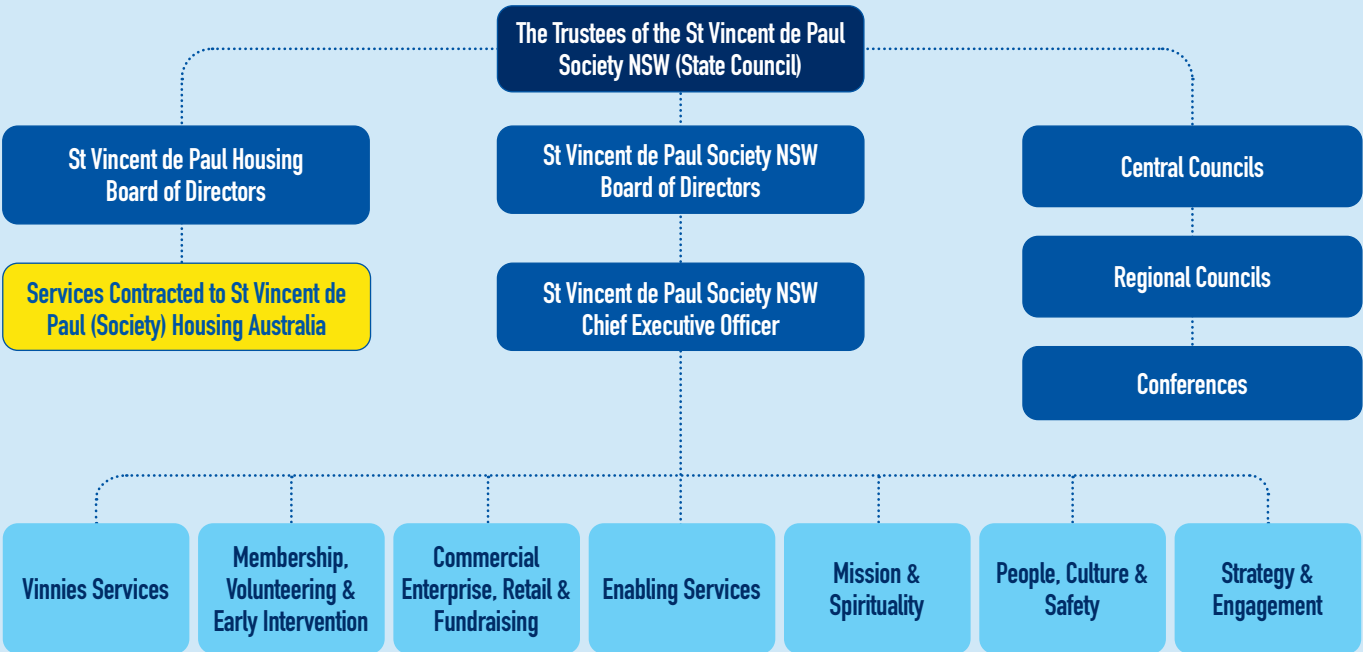
The State Council is part of a federated membership structure of Councils in each State and Territory and attached to the National Council of Australia. Members of the State Council are the Company Members of the Company.

The Trustees hold the financial and real property assets of the organisation on trust, which are made available for our good works in NSW. The Trustees are the Sole Company Member of SVDP Housing.

The Trustees, the Company and SVDP Housing are registered charities with the Australian Charities and Not-for-profits Commission ('ACNC') and are regulated by the ACNC. Together, the Trustees, the Company and SVDP Housing form a reporting group for the purpose of financial reporting to the ACNC.

Organisational Chart

St Vincent de Paul Society NSW, The Trustees of the Society of St Vincent de Paul (NSW) and St Vincent de Paul Housing



Our Governance Framework



The Company Board provides strategic oversight and direction for the activities of the Company.

Five advisory committees support the Company Board. They are:

- Audit, Risk and Finance Committee ('ARFC').
- Governance, Nominations Committee.
- People, Culture and Safety Committee.
- Service Quality and Safety Committee.
- Remuneration Committee.

The Board of Directors of the Company, through its ARFC, has oversight of the modern slavery risk management program. The ARFC is responsible for:

- Overseeing the development of the annual Modern Slavery Statement.
- Monitoring any identified risks and advising the Board on the mitigation of such risks.
- Providing updates to the Board, in accordance with the Risk Management Framework.

The following arrangements are in place to support the Society to meet its modern slavery obligations:

- Chief Financial Officer ('CFO') - Has overall responsibility for the organisation's Procurement Policy and procedures, and for ensuring the organisation's procurement practices have the necessary risk mitigation controls in place. The CFO also chairs the cross-functional Modern Slavery Working Group.
- Director Governance, Risk and Safeguarding - Is responsible for organisational governance and ensuring that governance policies and procedures are current and compliant, including those that concern modern slavery.
- Executive Directors - Are responsible for ensuring staff within their respective directorates comply with the organisation's policies and practices.

- Modern Slavery Working Group - Drives the modern slavery work in the Society in NSW. It meets at least six times per year, and Board Committees of the Company and SVDP Housing review its progress. While the composition of the Modern Slavery Working Group may change from time-to-time, the following roles and business functions are invited and represented:

- Legal and Contract Management.
- Risk, Compliance and Governance.
- Procurement and Fleet.
- Property and Facilities Management.
- Communications.
- Retail operations.
- People, Culture and Safety.
- SVDP Housing/St Vincent de Paul Society Housing Australia.
- Homelessness and Housing.
- Membership, Volunteers and Early Intervention.
- Mission and Formation.
- Policy and Advocacy.

Policies and other support documents relevant to managing the risk of modern slavery practices include:

- Modern Slavery Policy.
- Procurement Policy.
- Supplier Code of Conduct.
- Investment Policy.
- Whistleblower Policy.
- Complaints and Feedback Policy.
- Internal Grievance Policy.
- Risk Management Framework.

Escalation of Modern Slavery Issues

St Vincent de Paul Society NSW

Any suspected or identified modern slavery risk or incident is reported through our governance framework. Matters may be raised through management reporting lines, or in accordance with guidelines set out, respectively, in the Modern Slavery Policy, the Whistleblower Policy, the Internal Grievance Policy and the Complaints and Feedback Policy.

Significant risks or incidents are escalated and reported to the ARFC which, in turn, provides updates and recommendations to the Board of Directors. Where appropriate, the Board may direct management to undertake further investigation, implement remediation actions, or strengthen risk controls.

Trustees of the Society of St Vincent de Paul (NSW)

St Vincent de Paul Society NSW also supports the Trustees of the Society of St Vincent de Paul (NSW) including in respect of its compliance with the Modern Slavery Act 2018 (Cth).

St Vincent de Paul Housing Board

The SVDP Housing Board has responsibility for modern slavery oversight. The SVDP Housing Board, assisted by its Finance, Risk and Asset Management Committee ('FRAMC'), maintains compliance with corporate governance standards. The SVDP Housing Board engages St Vincent de Paul Society Housing Australia ('SVDPSHA') to manage the portfolio of SVDP Housing. SVDPSHA is a National Tier 1 Community Housing provider created by member Councils of the Society of St Vincent de Paul that operate in NSW, the ACT, South Australia & Tasmania.

SVDPSHA's Chief Executive Officer and Chief Operations Officer ('COO') have contractual responsibility for procurement on behalf of SVDP Housing. The COO is responsible for organisational governance and ensuring that governance policies and procedures remain current, including the Modern Slavery Policy. The suitability of the Governance Framework outlined above is considered annually, in conjunction with a review of the Modern Slavery Policy and the Risk Management Framework, and consideration of any reported modern slavery concerns.

Our People

We are a member and volunteer-based organisation that assists people experiencing disadvantage and hardship in NSW.

In doing so, we aspire to shape a more just and compassionate society for all and offer a hand up to those experiencing disadvantage. Our cohorts of members, volunteers, and employees conduct our work.

- **Members** – In NSW, we have over 4,200 members. They help people in need in local communities, visiting people we assist in their homes, offering friendship and material support including household goods, clothing, food parcels, and vouchers.
- **Volunteers** – We engage just under 8,300 ongoing volunteers. Many work in our Vinnies Retail Shops, while others support clients who engage with our services. Many volunteers prepare and serve meals through our Vinnies Vans mobile meals service. Our large network of volunteers supports the Conference activities of our members and many of our community programs and social justice activities across NSW.
- **Employees** – There are over 1,550 employees who work in a variety of executive leadership, management, client-facing, and business support roles. They work in our head office, in homelessness and housing services, health, aged care, and drug and alcohol services, in retail, fundraising, marketing, communications and in our case management services.



Our Footprint

We are an organisation focused on serving the most disadvantaged people in our communities, including people at risk of modern slavery practices, and by working to shape a more just and compassionate society. We have a significant local community presence throughout NSW with operations across the State.

Reflecting the history of the organisation, our membership structure has ten Central Councils, whose geographical boundaries align with the historical diocesan boundaries of the Roman Catholic Church in NSW. Employees and volunteers who are engaged by the organisation are organised into five distinct administrative Regions, each one of which encompasses one or more of the member Central Councils.

List of Company administrative regions and the member Central Councils they encompass in NSW.

REGION	CENTRAL COUNCILS
Metropolitan Region	• Broken Bay Central Council • Greater Western Sydney Central Council • Sydney Central Council
North East Region	• Lismore Central Council • Maitland-Newcastle Central Council
North West Region	• Armidale Central Council • Bathurst Central Council
South Region	• Wagga Wagga Central Council • Wollongong Central Council
West Region	• Wilcannia-Forbes Central Council

Central Council Map



WEST

Wilcannia/Forbes Diocese

NORTH WEST

Armidale Diocese

Bathurst Diocese

NORTH EAST

Lismore Diocese

Maitland/Newcastle Diocese

METROPOLITAN

Parramatta Diocese

Broken Bay Diocese

Sydney Diocese

SOUTH

Wollongong Diocese

Wagga Wagga Diocese

Conference Work

Our members are the face of the Society of St Vincent de Paul and work collaboratively in groups, called Conferences, in local communities across NSW. Roman Catholic Parish communities support these Conferences. Conference members visit people in their homes, aged care homes, and hospitals. Members consider any encounter between a member and a person seeking assistance, wherever it may be, as a 'visitation.' Conferences provide practical assistance such as food and shopping vouchers, furniture and clothing, help with other living costs, such as medical bills or back-to-school costs, and referral to community services. Importantly, Conference members offer emotional support to people in need, by accompanying them through their time of hardship.

Emergency Response

Our broad geographic reach and strong relationships with local communities across the State allow us to respond quickly when natural disasters, such as drought, bushfire, and floods, impact communities, when we deliver immediate emergency assistance. For example, when Ex-Tropical Cyclone and subsequent floods affected communities in the North East Region, our organisation stepped in and provided immediate assistance to people in their time of need. This assistance included distributing disaster relief funds and collaborating with the NSW Reconstruction Authority in recovery centres.

Vinnies Services

Our professional services offer a range of evidence-based case management and other supports through our homelessness and housing services, health services, disability and community inclusion services, and drug and alcohol services. Our homelessness and housing services offer several programs, including Specialist Homelessness Services, Soft Entry Hubs, and Social and Affordable Housing, as well as Together Home and Reconnect. We operate 10 dedicated Domestic and Family Violence Refuges and two other services that include domestic and family violence support. Our health services provide early intervention, crisis, and ongoing recovery support across six functions, including primary healthcare GP appointments, psychiatric consultations, and general healthcare (podiatry and optometry). Our disability and community inclusion services supported thousands of people in the reporting period through 15 services across NSW. Our Castlereagh Industries, which operates in Coonamble, employs 19 people living with a disability so they may realise their goals. Our range of alcohol and other drug (AOD) services includes detoxification and rehabilitation, complex AOD support, non-residential AOD day rehabilitation and AOD outreach. Vinnies Services supports men, women and children experiencing poverty and disadvantage to improve their lives.

Retail

The Society operates approximately 220 Vinnies Retail Shops and six distribution centres across NSW. Our large retail network provides a vital source of revenue which funds our programs and services. The Vinnies Retail Shop network raised \$91.7 million in sales revenue for the 2024-2025 financial year. In June 2025, we unveiled a new era in Vinnies Retail Shops with the launch of Vinnies Finds, our innovative online e-commerce platform, designed to bring the Vinnies Retail Shop experience, combining sustainability with social impact to customers at any place and any time.

Commercial Enterprise and Fundraising

In NSW, we are a major Return and Earn Scheme collection partner for eligible containers and operate ten automated bulk processing depots throughout the State.

Social and Affordable Housing

As a provider under the NSW Government's Social and Affordable Housing Fund (SAHF), SVDP Housing has constructed 502 units for social housing and affordable housing tenants.

Finally, the Annual Consolidated Revenue for the reporting entities comprising the St Vincent de Paul Society NSW in the period 1 July 2024 to 30 June 2025 was \$230,192,000.



CRITERION 3

Modern slavery risks

Operational risk

We comply with labour, employment, work health and safety, and whistleblower laws. We design our policies and procedures to protect our people and other stakeholders.

Having regard to the nature and location of our suppliers, we have recognised areas of vulnerability in cleaning and security services, waste management services, building and construction, property, and facility maintenance.

We engage third-party labour hire agencies to supplement our workforce. This approach provides flexibility, cost-efficiency, and the ability to respond and adapt to changing workforce needs. While using third party labour hire arrangements bring benefits, we must also manage the risks, including the risk of modern slavery.

The inherent nature of the third-party labour hire arrangements creates layers of separation between workers, employers (the labour hire agency), and customers (procuring the services of agencies and workers). This has the potential to leave workers vulnerable to labour exploitation. We recognise that indicators of modern slavery practices include underpayments, excessive hours, and unsafe working conditions.



Supply chain risk

We deliver a wide range of services across the community, including through our Vinnies Retail Shops, our network of Conferences, the Return and Earn depots, housing and homelessness services, our Vinnies Vans mobile meal and outreach services, disability and inclusion services, and health services.

Our broad and diverse supply chain supports our extensive community presence across NSW. We rely on an extensive network of suppliers and partners to deliver essential products and services. This enables the effective operation of our programs and ensures continued support for vulnerable individuals and communities.

As identified in previous reporting years, we continue to assess and identify areas of high risk within our supply chain, with special consideration given to geographic locations, industries and labour force that may be inherently at higher risk of

modern slavery practices. We reference the ACAN Category Risk Taxonomy when we undertake these assessments.

We continue to map our existing network of suppliers and analyse our supply chain to monitor and assess our risk, taking into consideration the following factors:

- **Industry risk:** Specific industry sectors deemed as high risk in international and national guidance documentation. These industries include cleaning, textiles, and construction.
- **Commodity/product risk:** Products and commodities deemed as high risk by the GSI, the US Department of Labor's List of Goods Produced by Child Labor or Forced Labor, and other international guidance materials. These products and commodities have been assessed as high risk due to the way they are produced, processed, or used. Such products include electronics, furniture, cotton and textiles, solar panels and foods such as coffee, rice, chocolate, and fish.

- **Geographic location:** This is based on estimated prevalence of modern slavery and the government responses as outlined in the 2023 GSI. Most of our suppliers are in Australia. However, several suppliers have an international presence and are likely to purchase goods and services or conduct activities from regions other than their Australian headquarters.
- **Workforce profile:** We consider the type of labour involved in the production of our goods and services, particularly where low skilled, vulnerable, or migrant labour is used.

These criteria guide our due diligence measures when dealing with suppliers or groups of suppliers. We conduct these due diligence activities when evaluating each potential supplier and when managing and monitoring our existing suppliers.

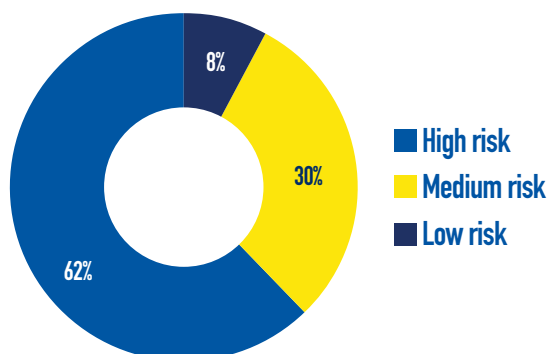
The graphs on the right illustrate our modern slavery risk ratings by our highest spend categories.

Summary

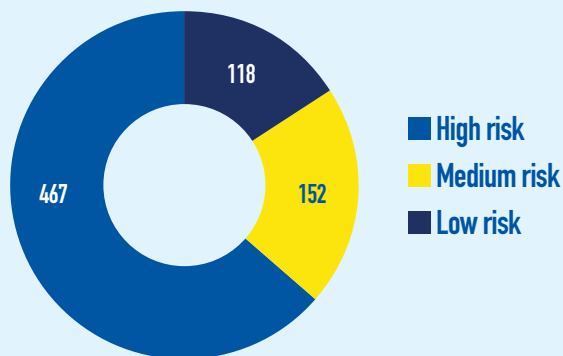
Of the 15 supplier categories that represent our greatest spend, we consider eleven categories to be high-risk. We consider 62% of the total spend analysed within these categories is high risk, which comprises more than four hundred and sixty-seven suppliers. The eleven supplier categories are:

- Food and catering.
- Finance and investment.
- Facility and property maintenance.
- Building and construction.
- Waste management services.
- Cleaning and security.
- Furniture and office supplies.
- Linen, laundry, and textile products.
- Transport, logistic and warehousing.
- Medical devices and supplies.
- Events and event management.

Risk by spend



Suppliers by risk category



Risk ratings by highest spend categories



CRITERION 4

Steps taken to address Modern Slavery Risk

At St Vincent de Paul Society NSW, we are committed to continually improving our risk management measures that identify and address the risk of modern slavery practices. We have continued to embed and develop further actions initiated in previous years, as well as introducing new actions and improvements as we continue to mature in our modern slavery risk management measures.

Through the Modern Slavery Working Group we continue to identify opportunities to raise awareness about modern slavery among our frontline employees, members, and volunteers. We use the resources available to us to assist people across the organisation to identify those who may be at risk of or are experiencing modern slavery from among those we assist and provide them with appropriate offers of support and referral.

In the area of learning and development in 2025, to mark the launch of the Society's 2024 Modern Slavery Statement, we held an online seminar on modern slavery. At this event, Moe Turaga, a lived experience advisor to the Australian Catholic Anti-Slavery Network and member of the Advisory Board of Domus 8.7 Modern Slavery Remediation Service, shared his lived experience of modern slavery, and discussed the

industries particularly at risk of exploitation. He reflected on how improving awareness and adopting responsible business practices helps organisations to identify and prevent modern slavery practices. Over 150 members, volunteers and staff attended this event.

Throughout 2025, we provided frontline staff and other key stakeholders with opportunities to complete online training that enables them to better recognise and support individuals experiencing modern slavery. We have added the ACAN Modern Slavery module to our internal member and volunteer learning portal and have included a section on modern slavery in the Vincentian Visitation Guidelines, a key reference document that supports Conference members when they engage with people we assist. The section added to the Vincentian Visitation Guidelines outlines for members our best practice approach to supporting people who seek assistance. As a result of these learning opportunities and implementation of support resources in 2025, we have had a measurable increase in the number of individuals trained on ACAN e-learning modules, and the number of staff participating in modern slavery workshops and meetings.

In terms of our operations in 2025, our actions to address the risk of modern slavery have been measured by:



Case Study: Contractor Management Project

During 2024, we laid a foundation for contractor management measures by undertaking a contractor management project. The Property Team, the Procurement Team and the Health and Safety Team have jointly led this initiative. The aim of the project has been to ensure effective management, compliance and safety of property contractors engaged to perform work for the Society.

In 2025, building on this foundation, we introduced an induction program for our suppliers and their workers, which provides education about, and awareness of, modern slavery. The program now has two elements. First, an onsite induction for workers attending a Society site and, second, provision of a Contractor Handbook to organisations we engage to do the work for us. During the reporting period, we inducted 161 companies and 495 individual contractors into the new system.

Procurement and Supply Chain activities

The Society operates a centralised procurement function that creates value, manages risk, and ensures appropriate governance in our supply chains. The focus of the procurement function is to amplify the impact and extend the reach of our core services.

Led by our Procurement team, our activities during 2025 have included the following:

- We have developed governance tools and measures to help us identify, prevent, and address the risk of modern slavery practices within our supply chain. These tools and measures seek to ensure our procurement activities align with our organisational values and commitment to protecting human rights and supporting ethical business practices. By embedding modern slavery risk controls in our policies, procedures, and contractual arrangements, we promote transparency, accountability, and responsible supplier engagement. These measures also support compliance with our legal and regulatory obligations and help safeguard the integrity, reputation, and social impact of our organisation.
- We have developed and introduced a Supplier Code of Conduct ('Code'), which replaces our Supplier Principles of Engagement. The Code establishes minimum ethical, human rights, and labour standards expected of all suppliers and entities within our supply chain. It forms a key component in our broader framework for identifying, mitigating, and addressing modern slavery risks. The Code requires all suppliers to uphold international human rights standards and ensure their operations do not cause or contribute to any human rights violations. Suppliers must actively manage risks of exploitation and take responsibility for ethical conduct within their workforce and supply chains. The Code reinforces our zero-tolerance approach to all forms of modern slavery, including forced labour, bonded labour, deceptive recruitment, and all forms of involuntary work. We require that suppliers ensure employment is voluntary, lawful, and free from coercion, and actively take steps to identify, mitigate, and remediate modern slavery risks within their own operations and extended supply chains. We have published the Code on our internal staff portal and our external company website and incorporated it into our contractor onboarding documentation. We have embedded environmental and social responsibility principles in the Code, which further support our approach to ethical sourcing by requiring suppliers to minimise environmental harm, respect First Nations communities, and foster inclusive and non-discriminatory workplaces. Broader in scope, these requirements strengthen our ability to detect vulnerabilities that may intersect with modern slavery risks.
- We continue to ensure supplier contracts include a requirement that suppliers make specific commitments to identify and mitigate modern slavery risk within their operations and supply chains. We include this requirement when negotiating with new suppliers and at contract renewal stage (if not already captured). We ensure we place these clauses in all our Society developed contract templates.

- We maintain our active membership of the Australian Catholic Anti-Slavery Network (ACAN). Ongoing engagement with ACAN assists us to build our knowledge and allows us to leverage ACAN resources to manage modern slavery supplier risks. In 2025, this has included seeking their advice and support for managing labour hire arrangements within the business.
- We continue to engage with our direct suppliers to access audit reports and other information in relation to the management of modern slavery risks.

These measures help build our maturity concerning modern slavery risk considerations in our procurement processes and reinforce our commitment to ethical and responsible sourcing.



Case Study: Labour Hire Working Group

Building on the foundation laid in 2024, the Labour Hire Working Group (LHWG) focused on completing its remaining objectives throughout 2025, with a shift towards education, implementation, and supplier-level engagement. Key activities in 2025 have included:

- a. Strengthening awareness of labour hire risks, obligations, and new processes by holding sessions with high use business areas.
- b. Embedding newly developed labour hire and recruitment contract templates across the organisation and ensuring operational teams apply these terms in all future supplier engagements.
- c. Identifying labour hire suppliers with the highest Society spend and commencing the transition from existing arrangements to updated contract templates wherever feasible. Two agencies that manage permanent placements have signed the terms of business.

Through this work, we continue to improve visibility of labour hire practices, strengthening controls around worker protections, and reducing modern slavery risks within this higher risk category of our supply chain. This program of work will remain a priority as we continue to mature our due diligence and supplier management framework.

Investment Policy and Portfolio

The Society continues to engage with an external investment firm, through which it continues to apply ethical screens to our investment portfolio. The ethical screens are Environmental Social and Governance ('ESG') filters. They continue to cover various areas, including civil liberties, labour rights – child labour assessment, and child labour. By using these ESG filters, we ensure our investment practices continue to align with the organisation's Investment Policy, which details our ethical considerations concerning where it places its investments, including a nil percentage of allowable holdings in organisations that may be involved in modern slavery. The ARFC receives an ESG report quarterly and provides oversight of specific ESG-related screening activities, enabling continued transparency and more informed discussion at the committee level.

Modern Slavery Risk Management Initiatives

As a values-based organisation, we have an ongoing commitment to further enhancing its practices to help combat modern slavery. Initiatives undertaken in 2025 have included:

- Developing and delivering targeted training.
- Ongoing supply chain risk management with assistance from SEDEX.
- Documenting solar panel manufacturer specifications.
- The Safeguarding Team managing and reporting modern slavery-related matters and leveraging their established subject matter expertise in supporting vulnerable individuals.

Domus 8.7

Domus 8.7 is an agency of the Catholic Archdiocese of Sydney in 2020 and a key element of the ACAN Modern Slavery Risk Management Program. This collaborative approach to remediation aligns with the Act and with the core principles of Catholic Social Teaching centred on the needs, wellbeing and empowerment of people impacted negatively by modern slavery practices.

Domus 8.7 provides the Society of St Vincent de Paul in NSW with:

- Resources that enable us to listen to workers (grievance channel).
- A 24/7 careline for workers on our sites, staffed by professional counsellors.
- Direct support for people impacted by modern slavery.
- Guidance and technical assistance to prevent, identify and remediate modern slavery.
- A documented process that assesses if an organisation caused, contributed to, or was linked directly to modern slavery and modern slavery indicators.

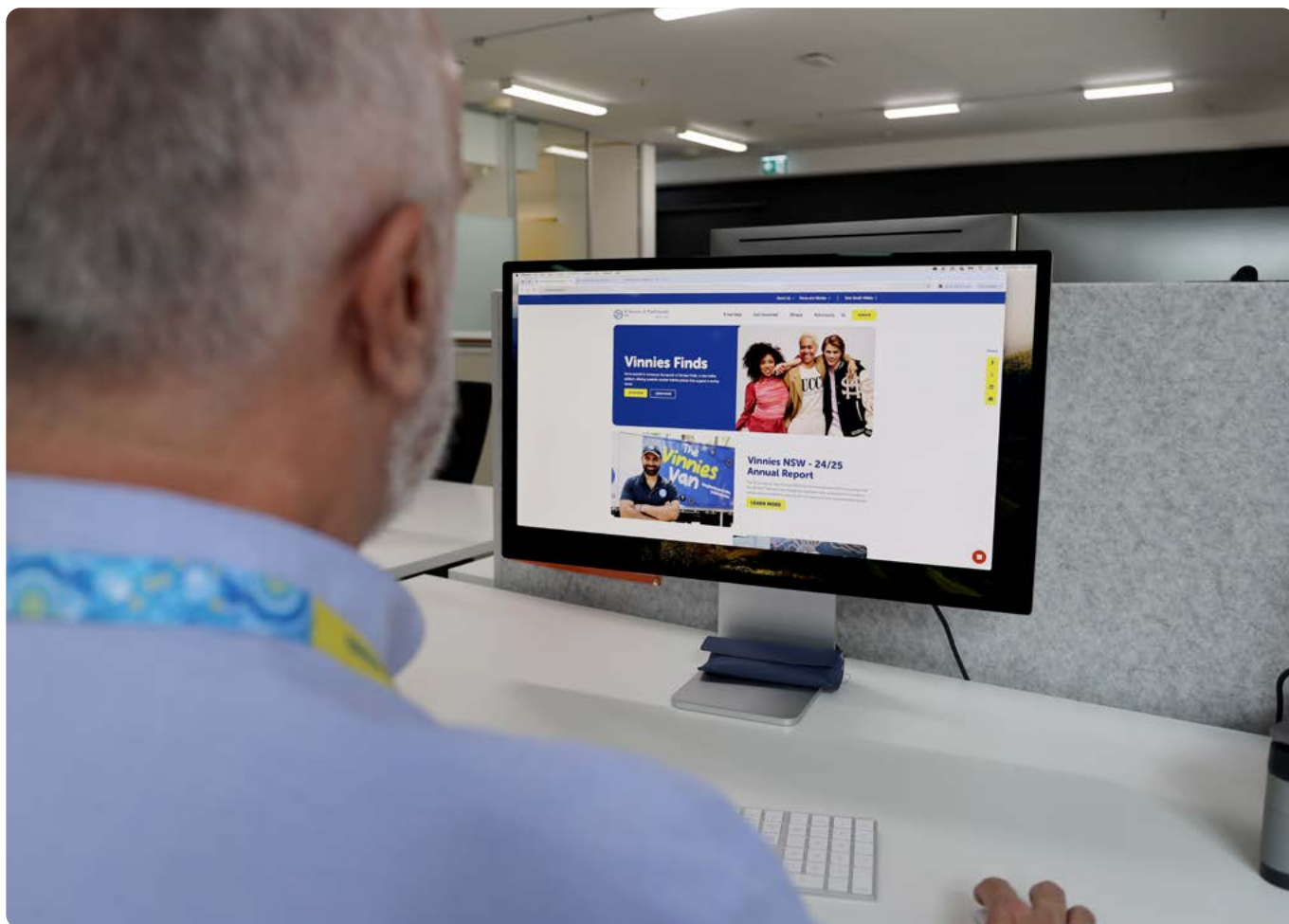
Domus 8.7 empowers people impacted by modern slavery practices to exercise choice and control over what forms of remediation would be meaningful to them and to engage safely with business/supply chain actors.



Supports can include:

- Modern slavery indicator assessment.
- Needs assessment, case coordination, response, and remediation planning.
- Referral to community, social services, unions.
- Transport, accommodation, financial and food support.
- Legal support, referrals, accompaniment, and advocacy.
- Job training, retraining, and redeployment.
- Accompaniment and advocacy to engage with government and law enforcement agencies.
- Opportunities to contribute lived expertise to improve modern slavery responses.

Currently, the Domus 8.7 Advisory Committee includes a person with lived expertise, Mr Moe Turaga. Domus 8.7 is a registered charity with the Australian Charities and Not-for profits Commission (ACNC) and is an endorsed Public Benevolent Institution with Deductible Gift Recipient (DGR) status (ABN 24 472 497 189).



Grievance Mechanism and Remediation

We have made a public commitment to providing an appropriate and timely remedy to people adversely affected by modern slavery practices. This commitment is consistent with the Guiding Principles on Business and Human Rights, issued by the United Nations Human Rights Office of the High Commissioner, the Commonwealth Modern Slavery Act 2018: Guidance for Reporting Entities and with relevant provisions in Australian Commonwealth and NSW State law. This commitment includes providing for, or cooperating in, actions that address harms caused to people and their root causes. The purpose of our commitment is to mitigate future risks. Where a business relationship links us to modern slavery practices through a business relationship, we are committed to working with the relevant business entity that has caused the harm to ensure appropriate remediation and to mitigate the risk of a recurrence.

We include remediation obligations and expectations in our contracts with high-risk suppliers who must notify and consult with us to ensure they implement victim-centred remediation processes to our satisfaction. Our Internal Grievance Policy and procedures provide an avenue for staff to raise workplace-related concerns, and our Whistleblower Policy allows for reports concerning any suspected wrongdoing. There is a confidential Whistleblower Hotline and email facility managed and staffed by an external independent third party.

Our website contains information on how to provide feedback and/or submit a complaint regarding any of our services and shops. Through these policies and measures we aim to ensure the safety and wellbeing of all Society personnel and ensure they are not at risk of modern slavery practices. We have integrated access to these services into our internal processes through our Modern Slavery Policy which provides workers with the email address and phone number for the Domus 8.7 remediation service.

We have deployed the ACAN 'Grievance Mechanisms and Remedy Pathways' training module to specific Society staff with relevant skills to manage complex issues involving vulnerable people. When indicators of modern slavery practices come to our attention through whistleblower or other channels, procedures are in place for relevant staff to contact law enforcement agencies, regulatory agencies and/or Domus 8.7 for assessment, investigation, action planning, and implementation of a remediation process.

CRITERION 5

Assessing Effectiveness

The Society continues to develop its capability to identify and manage modern slavery risks, as we seek to measure the effectiveness of the progress we have made since the inception of our Modern Slavery Risk Management Program.

Our governance framework, including our Modern Slavery Policy and Risk Management Framework, ensures there is appropriate oversight of our responsibilities, commitment, and approach to addressing modern slavery risks. Our ARFC and SVDP Housing's FRAMC review our Modern Slavery Action Plan.

In line with our Modern Slavery Action Plan for 2025, we have implemented the following items to improve our effectiveness in managing the risk of modern slavery:

- New agreements for engaging labour hire staff and information sessions for impacted people leaders in Vinnies Services and in warehouse operations. Both areas use temporary labour hire staff as a cost-effective way to meet seasonal demand. In 2025, we introduced two new agreements - the Labour Hire Services Agreement and the Recruitment Services Agreement - for use with external agencies. Following a review, we have streamlined the number of labour hire suppliers. We are using new contract terms with existing labour hire / recruitment agencies and introducing them with new suppliers as we engage them.
- The contractor management system, which includes education for contractors and their staff on modern slavery through our contractor induction program.

Other measures we have implemented to assess our maturity and effectiveness in managing modern slavery risks include the following:

- Governance, oversight, and accountability:
 - Improved cross-functional collaboration, coordinated by dedicated working groups such as the LHWG.
 - Expanded participation in the Modern Slavery Working Group, ensuring all business functions within the organisation are involved, representing our commitment to enhancing our effectiveness.
- Improved risk identification and assessment:
 - Increased scrutiny of higher-risk categories on an ongoing basis, including scrutiny of labour hire and procurement of imported goods.
- Enhanced supplier checks and engagement:
 - With each additional strategic sourcing project undertaken by the procurement function we are ensuring there is continuing consolidation of suppliers, more preferred supplier arrangements, and contracts with appropriate terms.
- Training and awareness:
 - Increased learning and development opportunities and training offerings, enhanced training content and more training support materials concerned with modern slavery awareness-raising.

CRITERION 6

Consultation with Owned or Controlled Entities

Members of the cross-functional Modern Slavery Working Group responsible for the Modern Slavery Risk Management Program include representatives from St Vincent de Paul Society NSW and SVDP Housing.

In 2025, we held six meetings of the Modern Slavery Working Group. This enables the organisation to mature in its modern slavery activities and allow further opportunities for greater

understanding of how modern slavery impacts our operations and supply chain. Considering modern slavery risks is increasingly a part of business decision making and the assessment of new opportunities throughout the organisation.

The entities work collaboratively to address modern slavery and have similar policies.

Note: The Statement does not include the process or activities associated with writing or approving the Statement

CRITERION 7

Any Other Relevant Information

St Vincent de Paul Society NSW is engaged in responses to modern slavery that go beyond the scope of the formal requirements specified in the Act.

Advocacy

Through our advocacy work we promote policy positions and initiatives that seek to lift people out of poverty and homelessness and protect vulnerable workers from exposure to modern slavery practices. This has been through government inquiries and consultations.

In 2024, the NSW Legislative Council established the Modern Slavery Committee to inquire into Modern Slavery Risks Faced by Temporary Migrant Workers in Rural and Regional NSW. In 2025, we made a submission (Submission 21) to the inquiry, and we made the following recommendations:

- i. Increased funding for community organisations, settlement, specialist homelessness, and domestic violence support providers.
- ii. Establishing regional Migrant Worker Centres.
- iii. More adequate funding for the Office of the Anti-Slavery Commissioner.
- iv. Changes to the PALM program that would:
 - i. facilitate portability between employers,
 - ii. provide additional social security benefits for PALM workers, and
 - iii. provide additional benefits and expanded program eligibility for temporary visa holders.

The Society continues to monitor the work of the inquiry and will review its final report. We expect it to be handed down in 2026. In addition, we have well established partnerships with other organisations to achieve joint objectives.

Since 2008, St Vincent de Paul Society NSW has operated the North Coast Settlement Service ('NCSS') in northern NSW. Funded by the Department of Home Affairs under its Settlement, Engagement and Transition Support (SETS) Program, NCSS assists refugees and other vulnerable migrants to build local connections and access mainstream services and supports. Although not funded to work directly with all temporary and permanent migrants experiencing potential modern slavery indicators, NCSS serves as a key access point for the local multicultural community. Whenever possible, NCSS refers ineligible clients to its extensive network of legal, community, and welfare service providers and Vinnies Conference volunteers to ensure their needs are met.

Since 2024, the NCSS manager has been a member of the NSW Anti-slavery Commissioner's Expert Advisory Panel. She was a speaker at the 2025 Anti-slavery Forum in November, and in December appeared before the Modern Slavery Committee at the Coffs Harbour hearing for the inquiry into modern slavery risks faced by temporary migrant workers in rural and regional NSW. Through NCSS, we remain actively involved with the NSW Advisory Panel to address modern slavery in the broader community.

Our Conference members also actively support various programs that help communities in developing countries located in the Asia-Pacific region that are vulnerable to modern slavery practices. Through the Twinning Program, our Conferences have established relationships of friendship and support with St Vincent de Paul Society Conferences in other countries. Under our guidelines, we limit funding provided through the Twinning Program to AUD \$2,000 or less in value for each project. These initiatives fund capacity-building projects to assist community members earn an income in areas where a twinned Conference operates. Projects have included cow and goat banks, water systems, tailoring and other small livelihood programs. Projects also provide opportunities to develop technical skills through education and training or support small enterprises focussed on garment making, fishing, and food production through farming.

A second program is the Assist a Student Program, which we fund entirely from donations. It helps disadvantaged primary, secondary, and tertiary students in a partner country within the Asia Pacific region to cover education-related expenses to break the cycle of poverty by providing access to education. The Twinning Program and the Assist a Student Program help build the capacity and resilience of vulnerable communities in developing countries and boost opportunity. In doing so, these programs address the root causes of modern slavery by reducing the vulnerability of communities in which these programs operate.



CATHOLIC
ARCHDIOCESE
OF SYDNEY



Sydney
Catholic
Schools

MODERN SLAVERY STATEMENT

1 January 2025 - 31 December 2025





Sydney Catholic Schools

Disclosure

This statement has been produced on behalf of Sydney Catholic Schools Limited (SCS) as Trustee for the Sydney Catholic Schools Trust.

Sydney Catholic Schools acknowledges and pays respect to Aboriginal and Torres Strait Islander Peoples as the First Nations Peoples of Australia, on whose ancestral homelands we live, serve, learn, worship and work; the homelands of Eora, Guringai, Dharawal, and Dharug peoples. We pay our respects to Elders past, present and emerging. We celebrate the histories, languages, cultures and spiritualities of Aboriginal and Torres Strait Islander Peoples. We respect their continuing connections to Country and Sea over thousands of generations, as the world's oldest living cultures. We seek to learn and embrace their care and love of Country.



Sydney Catholic Schools Limited (SCS)
ACN 619137343 as Trustee for the Sydney Catholic
Schools Trust ABN: 26158447082
L23 World Square, 680 George St, Sydney, NSW 2000.
www.sydcaholicsschools.nsw.edu.au

Approval and Signature

Most Rev Archbishop Anthony Fisher OP

This is the sixth annual Modern Slavery Statement for Sydney Catholic Schools (SCS) in response to the Modern Slavery Act 2018 (Cth). This reporting period demonstrates continuous improvement and targeted risk management actions on key procurement categories.

I express my gratitude to the SCS Modern Slavery Working Group for its implementation of the action plan and outcomes detailed in this statement. Efforts to protect our brothers and sisters from forced labour

and other forms of modern slavery are a recognition of the inherent value of each and every human person, made in the image and likeness of God.

Ensuring decent and dignified work for people who enable the mission of our schools every day must be at the heart of these efforts. I am pleased to see SCS working closely with the Domus 8.7 Modern Slavery Remediation Service on outreach to indirect workers on our sites and in our supply chains.

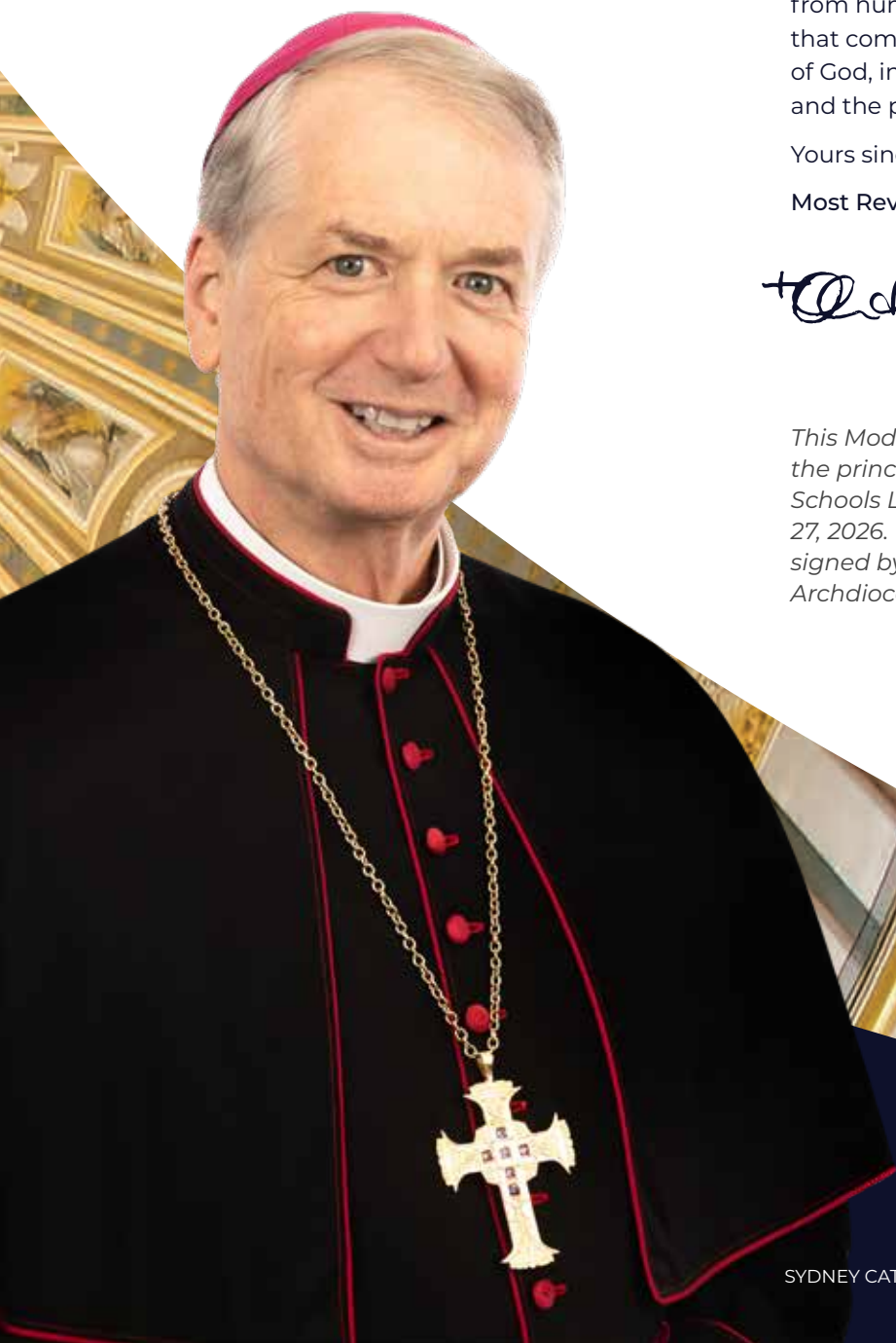
May St Josephine Bakhita, whose journey from human enslavement to the freedom that comes from knowing the infinite love of God, inspire our commitment to justice and the protection of human dignity.

Yours sincerely in Christ,

Most Rev. Anthony Fisher OP



This Modern Slavery Statement was approved by the principal governing body of Sydney Catholic Schools Limited as defined by the Act on May 27, 2026. This Modern Slavery Statement is signed by a responsible member of the Catholic Archdiocese of Sydney as defined by the Act.



Foreword

Sydney Catholic Schools

Sydney Catholic Schools is committed to the elimination of modern slavery and to fostering a culture that upholds the dignity and rights of every person.

Our commitment is grounded in both moral responsibility and legal obligation. Inspired by Pope Francis' exhortation in *Laudato Si'* and guided by the requirements of the Australian Modern Slavery Act 2018, Sydney Catholic Schools takes a proactive and structured approach to identifying and addressing risks of modern slavery across our operations.

Sydney Catholic Schools undertakes due diligence on high risk suppliers, particularly in industries where modern slavery risks are known to be elevated. In 2025, we audited several cleaning contractors and uniform suppliers on their compliance with the Fair Work Act and payment of minimum wages. Anti-slavery obligations are also embedded in contracts and tender processes across our network of more than 6,500 suppliers.

We strengthen our impact through collaboration. We work closely with the Australian Catholic Anti-Slavery Network to build capability and coordinate sector-wide action.

Education and awareness are central to our approach. All Business and Operations Managers and Senior Financial Administration staff across our 147 schools have completed modern slavery training modules. Our Modern Slavery Working Group also meets bi-monthly to coordinate initiatives, monitor emerging risks, and ensure accountability across our organisation.

Through strong governance, rigorous due diligence, sector collaboration, and ongoing education, Sydney Catholic Schools remains steadfast in its commitment to protecting human rights and working towards a safe and equitable future for all.



Danielle Cronin

Executive Director,
Sydney Catholic Schools





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Introduction

The Australian Modern Slavery Act 2018 (Cth) requires SCS to annually report on activities and actions taken during the reporting period to assess, address and mitigate the risk of modern slavery to workers in operations and supply chains. The SCS Modern Slavery Statement addresses the following seven mandatory reporting criteria:

1. Organisational structure and governance
2. Operations and supply chains
3. Modern slavery risks in operations and supply chains
4. Actions taken to assess and address risks, including due diligence and remediation processes
5. Measuring the effectiveness of action taken and demonstrating continuous improvement
6. The process of consultation with entities owned or controlled
7. Any other information

Criteria 1 and 2

About Sydney Catholic Schools

SCS is the system of 147 Catholic primary and secondary schools operating across the Catholic Archdiocese of Sydney (CAS), providing more than 74,000 students with an affordable, high-quality Catholic education.

As an agency of CAS under the leadership of Archbishop Anthony Fisher OP, SCS collaborates with parishes and other CAS agencies to provide education to students of the Archdiocese.

SCS provides strong faith-based education, catering for students with all interests and abilities through programs such as the Newman Selective Gifted Education Program, the Amadeus Music Program, Arts HQ, and our vocational education offerings.

SCS' commitment is to ensure that every student feels welcome at school and has the support to thrive academically and socially.

Total Students

74,422

Primary Students

40,800

Secondary Students

33,622

Staff

12,427

Number of schools

147

110

Primary
schools

31

Secondary
schools

6

Combined Primary &
Secondary schools

SCS Mission, Vision and Values

The **mission** of SCS is 'to know and love Christ through learning'.

The SCS **vision** is to create 'thriving Catholic communities through excellent teaching and learning'.

Our **values** are:

truth – seeking to know and live the truth

collaboration – engaging respectfully and meaningfully with others

excellence – striving to achieve one's potential

empathy – appreciating and responding to the views and needs of others

curiosity – nurturing the search for meaning

The SCS **strategic plan** is:

To participate in the life and mission of the Catholic faith community

To deepen knowledge and engagement with the Catholic faith and tradition

To build each student's capacity to continuously reason reflectively, logically and critically

To embrace the interdependence of human existence as global citizens, who are responsible to and for themselves and others

To provide an engaging, holistic learning experience, where students thrive academically

To be places where every student excels in a multitude of ways, through personalised and self-paced learning

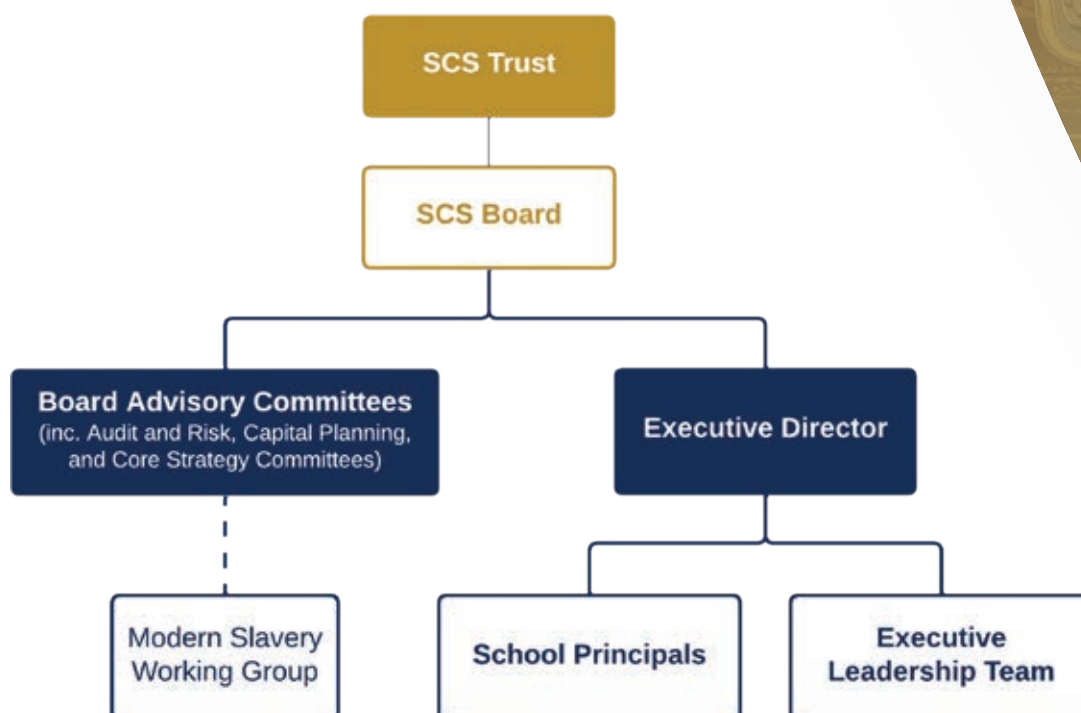
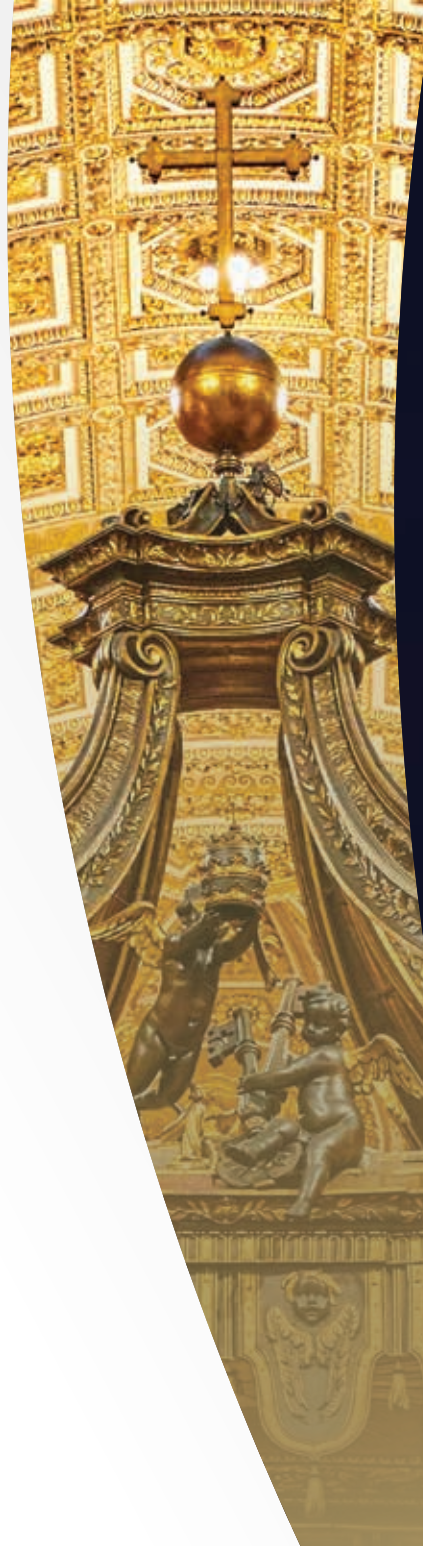
Governance Framework

Sydney Catholic Schools Limited (Trustee) is the corporate trustee for Sydney Catholic Schools Trust (the Trust) and the Registered Proprietor of Catholic systemic schools in the Archdiocese of Sydney. The Trustee is responsible for ensuring:

The advancement of education through the operation of an effective system of Catholic education at all levels which contributes to the total educational needs of young people in Catholic schools, in accordance with the principles of the Catholic Church.

The SCS Trust Board is supported by Board advisory committees, the Executive Director, and the Executive Leadership Team. The SCS Trust Board is responsible for providing leadership and strategic guidance to SCS and for corporate governance. The SCS Audit and Risk Committee (ARC) assists the SCS Trust Board to exercise due care, diligence and skill through the oversight of risk management, compliance and assurance activities and making recommendations to the SCS Trust Board on those matters.

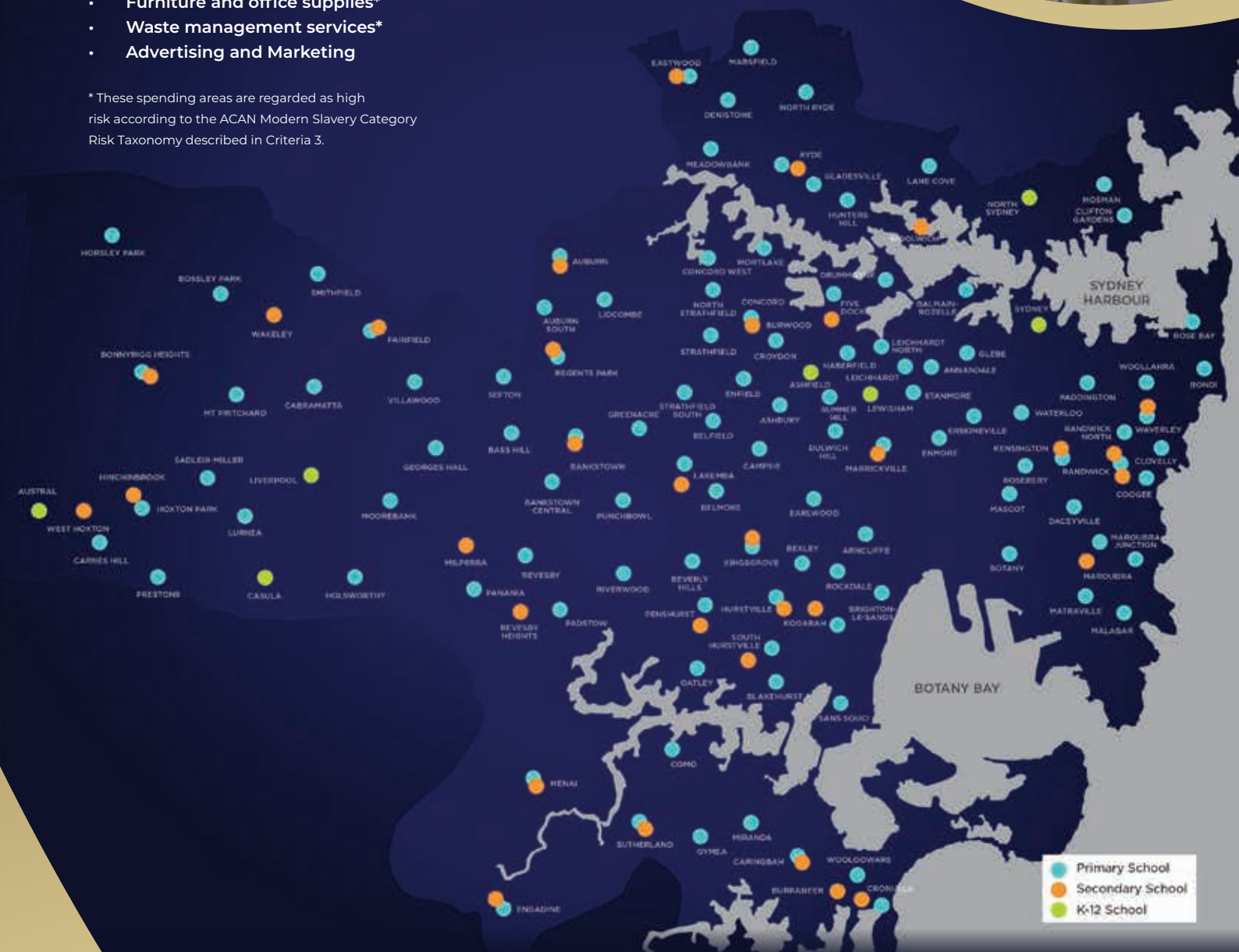
The SCS Modern Slavery Working Group (MSWG), chaired by the Director of Property and Finance, provides reports to the SCS ARC.



A circular inset image showing the back of a person in a white habit with a long black veil, standing in a church doorway. The person is facing away from the camera, looking out into a bright, arched opening. The image is framed by a dark blue background with a large, light blue circular graphic element.

A map of Sydney, Australia, showing the locations of various schools. The map uses colored dots to indicate different types of schools: blue for Primary Schools, orange for Secondary Schools, and green for K-12 Schools. Major geographical features like Sydney Harbour, Botany Bay, and the city center are labeled. Numerous suburbs are also labeled, such as Eastwood, Marrickville, North Ryde, Ryde, Gladesville, Lane Cove, North Sydney, Mosman, Clifton Gardens, Rose Bay, Wollahra, Bondi, Randwick, and others. A legend in the bottom right corner explains the color coding: a blue circle for 'Primary School', an orange circle for 'Secondary School', and a green circle for 'K-12 School'.

SYDNEY CATHOLIC SCHOOLS MODERN SLAVERY STATEMENT 09



Criteria 3

Modern slavery risks in operations and supply chains



SCS works closely with the Australian Catholic Anti-slavery Network (ACAN) to manage modern slavery risks in operations and supply chains.

The ACAN risk management program (ACAN Program) and the agency, Domus 8.7 modern slavery remediation service, are facilitated by CAS. CAS employs five modern slavery specialist staff, including a Modern Slavery Lived Experience Lead, to manage both the ACAN Program and Domus 8.7.

Risk Assessment

For Catholic entities, modern slavery risks are defined by the ACAN Category Risk Taxonomy, a classification standard that identifies the severity of actual or potential harm to people (saliency) in 25 spend categories.

The ACAN Category Risk Taxonomy is based on sources such as:

- The Global Slavery Index
- The International Labor Organisation (ILO), includes definitions of modern slavery
- The Bureau of International Labor Affairs (ILAB), U.S Department of Labor
- The Global Child Forum and UNICEF

Five key factors are also used to determine the level of risk:

- **Geography:** the country or location where a good is made or a service is delivered
- **Industry:** the sector in which the making of goods or the delivery of service occurred
- **Commodity:** the raw materials or components that comprise the goods or products
- **Workforce vulnerability:** such as bonded visas, temporary migrants, women or children known to be employed in specific industry sectors
- **Domus 8.7:** trends, cases, and risk intelligence identified through the Domus 8.7 remediation service, including grievances and remediation insights relevant to category and risk to workers.

ACAN Category Risk Taxonomy Classification

High Risk	Medium Risk	Low Risk
Building and construction	Advertising and marketing	Professional services
Cleaning and security	ICT Software and network services - onshore	Financial expenses
Events and event management	Utilities	Government and agency fees
Facility management and property maintenance	Fleet management, consumables and maintenance	License / membership fees
Finance and investment	Travel and accommodation	
Food and catering services	Print / mail provider	
Furniture and office supplies		
ICT hardware		
ICT software and network services - offshore		
Labour hire		
Linen, laundry and textile products		
Medical devices and supplies		
Transport, logistic and warehousing		
Uniforms and PPE		
Waste management services		

SCS Operations

To support student learning, school staff, including principals, along with SCS Central Office staff, are responsible for ensuring that schools remain well-maintained and fully equipped. SCS operations include:

- Participating in the life and mission of the Catholic faith community
- Delivering an authentic, high-quality Catholic education to students
- Collecting fees and supporting families with fee assistance and bursary programs
- Support, professional development, and administration of salaries for our workforce
- Build and maintain buildings and facilities
- Procurement of good and services
- Financial management
- Compliance, risk and safety management
- Build and maintain information technology services
- Marketing and communication services

SCS Workforce

SCS maintains standards of conduct based on Catholic Social Teaching for all employees and volunteers, and provides a safe work environment for everyone visiting or working on SCS premises.

The SCS workforce is managed through multiple Enterprise Agreements in accordance with workplace laws and freedom of association, so the risk of modern slavery in SCS' directly employed workforce is minimal. This is coupled with recruitment practices that ensure a fair and transparent merit-based process of appointment, ensuring additional controls are in place during the hiring process.

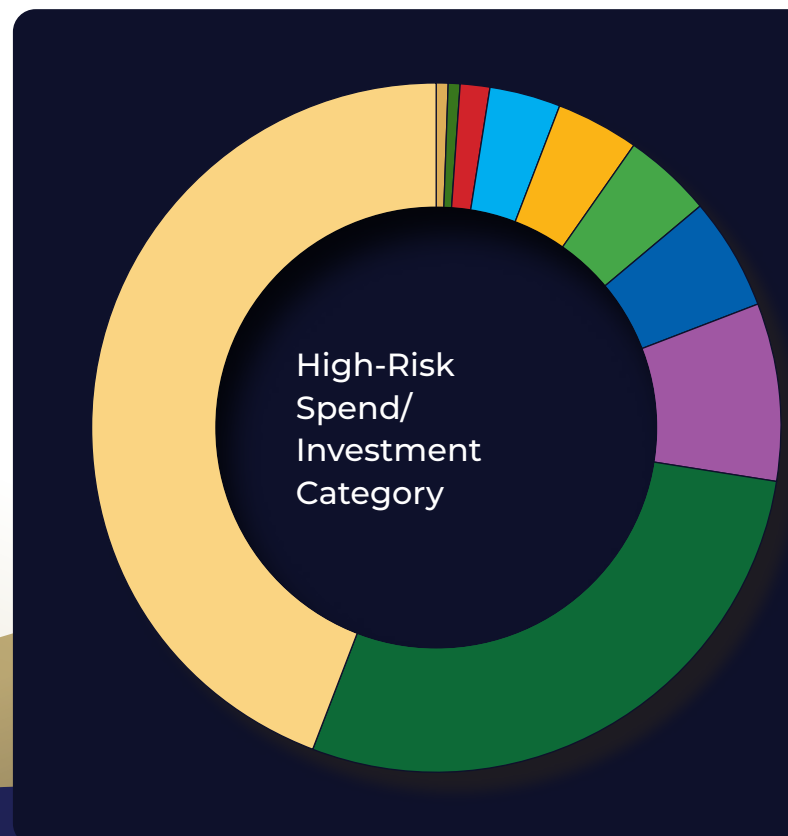
SCS recognises that there are areas with heightened risks of modern slavery such as security, cleaning, and food and catering services. Approximately 525 people work across these functions on SCS sites.

SCS Supply Chain

Schools have autonomy to engage suppliers in accordance with SCS' policies. However, for certain high value categories the SCS procurement team engages with suppliers on behalf of schools. This includes categories such as ICT, waste management, utilities and building works.

SCS procurement maintains a preferred suppliers list for schools to select suppliers. Suppliers on the list are vetted, reviewed and updated according to SCS requirements. SCS Procurement policy mandates due diligence processes, including ensuring new suppliers meet SCS modern slavery policy requirements.

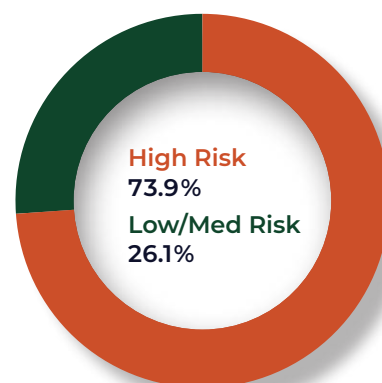
SCS requires all suppliers to use standard SCS contracts except under exceptional circumstances. Standard SCS contracts include terms and conditions relating to modern slavery and more comprehensive clauses for high risk contracts. In the rare circumstances where a non-SCS templated contract is used, SCS negotiates to include appropriate Modern Slavery clauses to form part of the supplier's obligations.



SCS Supply Chain Risk

Modern slavery risks associated with SCS have been identified across multiple spend categories using the ACAN Category Risk Taxonomy, spanning 25 categories.

2025	Total	High Risk	Low/Med Risk
SCS Spend & Investments	\$675.0m	\$498.8m	\$176.2m
SCS Number of Suppliers	6,382	3,044	3,338



SCS High Risk Spend and Investment Categories

SCS high risk Spend and Investment Categories for the calendar year 2025 totaled \$498.8 million across 3,044 suppliers. The overall spend was divided into 74% high risk and 26% low/medium risk, while the supplier distribution was 48% high risk and 52% low/medium risk.

SCS has long-term investments of \$221.1m, which are subject to strict ethical investment policies for both Australian and global equities.

Building & Construction spending (\$141.7m) presents a significant spend risk for SCS at 28.4% of total high risk spend, although the lower number of suppliers (72) helps mitigate this risk. The Facility Management and Property Maintenance category accounts for the highest number of high risk suppliers (962) and the third-highest spend (\$41.1m). Together, these three categories— Finance and Investment, Building & Construction, and Facility Management & Property Maintenance—account for 81% of SCS' high risk spend and investments.

High-Risk Spend/Investment Category	Spend (\$m)	% of spend	Suppliers
Finance and Investment	\$221.1	44.3%	1
Building and Construction	\$141.7	28.4%	72
Facility Management & Property Maintenance	\$41.1	8.2%	962
Events and Event Management	\$26.8	5.4%	676
ICT Hardware	\$20.8	4.2%	144
Cleaning and Security Services	\$18.6	3.7%	132
Furniture and Office Supplies	\$17.5	3.5%	313
Food and Catering Services	\$6.8	1.4%	577
Uniforms and PPE	\$2.4	0.5%	126
Waste Management Services	\$2.1	0.4%	41
Total High Risk Spend Categories	\$498.8	100%	3,044

Criteria 4

Actions taken to assess and address risk

2025 Key Initiatives

Suppliers



1,536

Suppliers completed the ACAN supplier pre-assessment survey

133

Suppliers joined Sedex

34

Supplier staff attended ACAN Webinars

187

Suppliers completed the SEDEX Supplier Assessment Questionnaire (SAQ)

Actions

Completed 12 of 14 key performance indicators, with 2 areas in progress.

Governance

Modern Slavery Working Group meetings held bi-monthly during 2025. KPI-driven action plan actively managed by the MSWG.



Systems

Completed supplier categorisation using an updated ACAN risk taxonomy which improves the accuracy of SCS spend data across high, medium and low risk suppliers.

Processes

Completed wage audits of 23 SCS Cleaning contractors and desktop reviews of 18 Uniform suppliers, focusing on labour hire and subcontracting arrangements.



Professional Development



SCS represented at the NSW Anti-Slavery Commissioner's Building Freedom Together Forum.



Raising Awareness

Celebration of the Feast Day of St Josephine Bakhita, patron saint of victims of modern slavery and human trafficking, February 11.



*Feast Day of
St Josephine Bakhita*

*Feast Day of
St Josephine
Bakhita*

SCS maintains a proactive approach to address and mitigate the risks of modern slavery. The SCS Modern Slavery Working Group (MSWG), a collaborative group of executives from all SCS Directorates, continues to focus on the delivery of the Modern Slavery action plan and track progress against key performance indicators.

During the reporting period, SCS continued to work closely with ACAN specialists to better understand, develop and action our risk management program. Refer to the specific activities listed below for further information.

In 2025, SCS implemented a number of initiatives and reached important milestones. These are summarised below:

- Continued the ACAN modern slavery risk management program for 2023 - 2026.
- Collaborated with other Catholic dioceses, social services and school systems.
- Executed the SCS Modern Slavery Action Plan with Key Performance Indicators (KPIs).
- SCS Board continued to review the SCS Anti-Modern Slavery risk profile and advise on mitigations.

- Continued on-boarding suppliers to Sedex via ACAN's pre-assessment survey and invitations to relevant suppliers to join Sedex. 1,536 suppliers completed the ACAN supplier pre-assessment survey and 187 suppliers completed the SEDEX Supplier Assessment Questionnaire (SAQ).
- Increased the number of SCS staff completing ACAN eLearning modules via the SCS Learning Management System (LMS), focussing on SCS Central Office staff.
- Hosted and attended events to raise awareness of modern slavery including:
 - ▷ Commemoration of the Feast Day of St Josephine Bakhita, patron saint of victims of modern slavery and human trafficking (February 11).
 - ▷ Updated all SCS Business and Operations Managers regarding managing modern slavery risks in SCS supply chains and operations.

- ▷ Attended the NSW Anti-slavery Commissioner's Online Forum, 20 - 21 May
- ▷ Attended Sedex Webinars and in-person member sessions throughout the year covering topics such as Self-Assessment Questionnaires, Supplier engagement, SMETA Auditing standards, and remediation services for victims of modern slavery such as Domus 8.7.
- ▷ Attended the webinar: Unmasking the True Cost of Online Scams - World Day Against Trafficking in Persons, 30 July.
- ▷ The SCS Modern Slavery Liaison Officer (MSLO) was invited to represent SCS at the NSW Anti-Slavery Commissioner's Building Freedom Together Forum, Wollongong, 5 - 6 November.

- ▷ Over two engaging days, experts and advocates from across the anti-slavery community explored practical, collaborative solutions to the everyday challenges of preventing modern slavery and supporting survivors. With a strong focus on innovation and partnership, the Forum informed, empowered and activated professionals, decision-makers, researchers, and people with lived experience to drive meaningful progress for the anti-slavery movement in New South Wales and beyond.



▸ SCS staff and suppliers participated in eight ACAN modern slavery capacity building webinars throughout the reporting period. Webinars addressed sustainable and ethical procurement, and covered industries such as construction, uniforms and textiles, cleaning, waste management, and financial services.

• Collaborated with the SCS Chief Risk Officer to update the SCS Modern Slavery Risk Register and improve risk controls.

• Performed desktop social compliance audits of several SCS Cleaning contractors, focusing on labour hire and subcontracting arrangements.

• Ensured all new contracts included Modern Slavery as a mandatory criterion when evaluating all suppliers and tenders. SCS considers the modern slavery risk level (high, medium, low) of the supplier's industry according to the ACAN Category Risk Taxonomy, and any policies, procedures and systems the supplier uses to manage modern slavery risks in their own operations and supply chain.

• Modern Slavery clauses are included in external suppliers' non-standard contracts that SCS enters into.

• Completed our program of improving the accuracy of supplier records and spend data in SCS' enterprise financial management system (CiA) by updating supplier categorisation to align with the ACAN Risk Taxonomy categories.

• Attended professional development on the use of the ACAN ROTA system to record modern slavery risk management activities.

Building Freedom Together Forum



ACAN Supplier Engagement

The ACAN Program provides supplier engagement support and data, enabling a systematic and comprehensive supply chain risk assessment. In 2025 the ACAN Modern Slavery Risk Management Program launched a new purpose-built data management platform - ROTA. ROTA centralises the ACAN Risk Management Program framework and facilitates supplier performance evaluation and engagement.

1. Evaluation of the modern slavery risk within operations and supply chains, using the ACAN Risk Taxonomy.
2. ACAN Supplier Survey to identify supplier revenue, number of employees, countries of origin for goods sourced overseas, workforce contractual arrangements and Sedex membership status.
3. Supplier education on modern slavery and risk management in key areas: cleaning, building and construction, procurement of labour, labour hire and services, sourcing goods from overseas, grievance mechanisms and remediation.
4. Onboarding suppliers to Sedex requires a business address, contact details and goods or services provided.
5. Sedex Self-Assessment Questionnaire (SAQ) helps suppliers to evaluate their practices against established standards and identify areas for improvement.
6. Desktop review to identify key actions required from suppliers.
7. Enhance supplier screening using Know Your Client (KYC) intelligence software.
8. Corporate Social Compliance Audits provide a point-in-time, objective and independent verification process of supplier alignment with local laws and worker wellbeing standards.
9. Domus 8.7 Index modern slavery statement assessment on selected suppliers in high risk categories.
10. ACAN Prequalified Supplier Directory - a list of preferred suppliers accessible to Catholic organisations.

SCS Supplier Survey Overview

Data aggregated from 1,536 SCS suppliers that have completed the ACAN Supplier Survey

Estimate of annual revenue in AUD	%GT Count of Australian Business Number or other
\$ 0 - 5 Million	56.79%
\$ 5 - 25 Million	19.16%
\$ 50K - 500K	7.72%
\$ 100 - 500 Million	5.44%
\$ 500K - 1 Million	4.55%
\$ 25 - 50 Million	4.48%
\$ 50 - 100 Million	3.72%
< \$50k	3.24%
\$1 - 5 Billion	2.27%
\$500 Million - 1 Billion	1.86%
\$ +5 Billion	0.48%
A\$ 5 - 25 Million	0.48%
Total	100%

SCS Supplier Engagement Overview

Data aggregated from 1,536 SCS suppliers that have completed the ACAN Supplier Survey

Total suppliers

6,382

Suppliers in High Risk procurement categories

3,044

ACAN Supplier Surveys completed in 2025

552

Supplier e-mail shared

6,310

ACAN Supplier Surveys completed

1,536

Suppliers identified for Sedex Onboarding

117

Supplier Communication

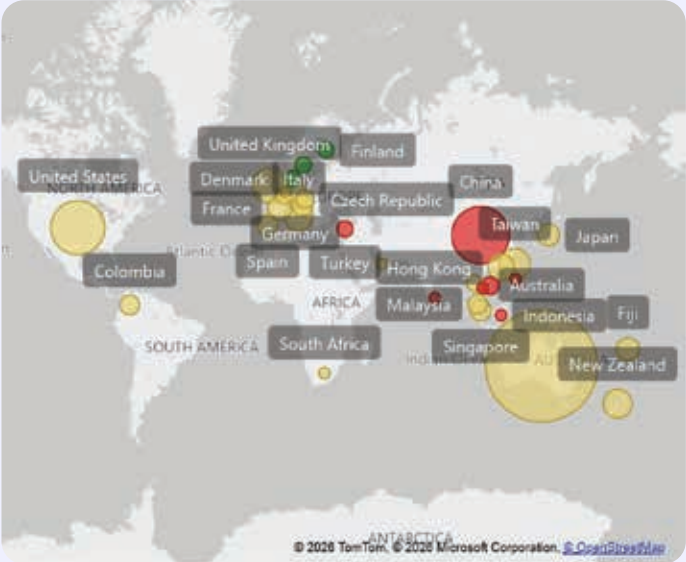
6,862

In relation to the number of direct and indirect staff and / or employees in your operation, please select	%GT Count of Australian Business Number or other
1 to 5 direct and indirect staff and/ or employees	27.56%
11 to 49 direct and indirect staff and / or employees	26.70%
6 to 10 direct and indirect staff and/ or employees	16.91%
I am a Sole Trader	12.92%
50 to 249 direct and indirect staff and / or employees	12.06%
250 or more direct and indirect staff and/ or employees	6.03%
250 to 1,000 direct and indirect staff and/ or employees,	2.11%
1,000 to 5,000 direct and indirect staff and/ or employees	1.25%
More than 5,000 direct and indirect staff and / or employees	0.86%
Total	100%

Does your business utilise any o f the following?	%GT Count of Australian Business Number or other
Casuals	42.40%
Sub-contractors	25.03%
Independent Contractors	3.77%
Casuals Sub-contractors	2.63%
Workers residing overseas	2.29%
Volunteers	1.26%
Temporary visa-holders	1.14%
Casuals Independent Contractors Sub-contractors	1.03%
Worker engaged through a Third-party company (e.g. labour hire, service providers, etc.)	1.03%
Casuals Graduates/ interns/ vacation students	0.91%
Casuals Independent Contractors	0.80%
Casuals Temporary visa-holders	0.80%
Casuals Sub-contractors Worker engaged through a Third-party company (e.g. labour hire, servlce providers, etc.)	0.69%
Casuals Workers under 18 years of age	0.69%
Independent Contractors	0.69%

Sourcing Countries for Tier 1 Suppliers

Overall inherent risk category ● high ● low ● medium



Suppliers completing e-learning

34

Audits in 2025

19

Audits Findings in 2025

151

Supplier Screening - ACAN Collated

Enhanced 3rd Party Supplier Screening

529

3rd Party Supplier Screening - High and Medium Risk

25

Suppliers on Sedex

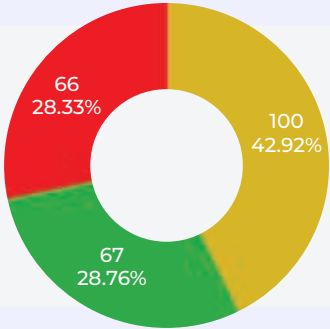
133

SAQs Completed

187

Sedex SAQ Risk Category

- High 66 (28.33%)
- Medium 100 (42.92%)
- Low 67 (28.76%)





Remediation



Domus 8.7

SCS is a founding member of Domus 8.7. Domus 8.7 was established as an agency of the Catholic Archdiocese of Sydney in 2020 as a key element of the ACAN Modern Slavery Risk Management Program. This collaborative approach to remediation is aligned with the Modern Slavery Act and Catholic Social Teaching which are centered on the needs, wellbeing and empowerment of people impacted.

Domus 8.7 provides SCS:

- Resources that enable us to listen to workers (grievance channel)
- A 24/7 careline for workers on our sites, staffed by professional counsellors
- Direct support to people impacted by modern slavery
- Guidance and technical assistance to prevent, identify and remediate modern slavery
- A documented process to assess if an organisation has caused, contributed or is directly linked to modern slavery and modern slavery indicators

Domus 8.7 empowers people impacted by modern slavery to have choice and control over what forms of remediation are meaningful to them and to engage safely with business/supply chain actors. Supports may include:

- Modern slavery indicator assessment
- Needs assessment, case coordination, response and remediation planning
- Referrals to community, social services, unions
- Transport, accommodation, financial and food support
- Legal support, referrals, accompaniment and advocacy
- Job training, retraining and redeployment
- Accompaniment and advocacy to engage with government and law enforcement agencies
- Opportunities to contribute lived expertise to improve modern slavery responses

The Domus 8.7 Advisory Committee Members also include a person with lived expertise, Mr Moe Turaga. Domus 8.7 is a registered charity with the Australian Charities and Not-for-profits Commission (ACNC) and is an endorsed Public Benevolent Institution with Deductible Gift Recipient (DGR) status. ABN 244 72497189



SCS plans for 2026 and beyond:

- Continued execution of the SCS Modern Slavery Action Plan and achieve specified KPIs.
- Actively engage in, and encourage SCS suppliers to participate in, ACAN webinars and other learning and engagement opportunities.
- Actively engage in ACAN action planning workshops.
- Continue improving data integrity by updating SCS systems and supplier onboarding processes, including mapping standard supplier classifications to the appropriate modern slavery risk category aligned with the ACAN Category Risk Taxonomy.
- Remain vigilant regarding the mandatory inclusion of Modern Slavery clauses in all new supplier contracts.
- Update contract and tender documentation to:
 - Require suppliers in high risk categories, including Canteen, Uniforms, and Cleaning services, to join Sedex and complete the SAQ.
 - Strengthen the identification of subcontracting practices, supply chain transparency, employee Fair Work rights, Workplace Health and Safety (WHS) compliance, and modern slavery risks. This initiative aims to improve due diligence, enhance supplier accountability, and identify high risk suppliers more effectively.
- Continue investigating supply chains, including Tier 2 and 3 suppliers using the SMETA auditing standard, in high risk areas such as Cleaning Contractors, Uniform suppliers and Canteen operators.
- Continue to provide avenues for workers to report any potential incidents of modern slavery. This will include the rollout of Domus 8.7 posters in multiple languages to 147 school sites. The posters will be located in easily accessible areas frequented by cleaning staff and canteen staff (e.g. cleaners' store rooms, school canteens).
- Continue to enhance reporting capabilities from SCS finance and contract management systems (e.g. Modern Slavery Spend Dashboard, SCS Suppliers Dashboard).
- Commemoration of the Feast Day of St Bakhita across SCS schools and the central office.
- Include issues regarding Modern Slavery and human trafficking in the appropriate curriculum across SCS schools.
- Continue to invest ethically by applying the lens of Catholic values.



Criteria 5

Measuring Effectiveness

ACAN collaboration for continuous improvement

Collaboration is at the heart of accelerating progress. This also includes opportunities to comparatively measure social, environmental and governance (business ethics) risks and actions with peers in our network.

In its foundational stages, SCS used an internally devised ACAN framework to measure progress. This bespoke approach reflected the unique priorities, constraints, and practices across Catholic organisations.

In 2025, the ACAN Program adopted a globally recognised risk measurement system through SEDEX. This aligns reporting entities with a methodology that combines global data about risks in different countries and industries with site-specific information from the SEDEX platform. SEDEX regularly updates the methodology to ensure it is aligned with new and emerging risks. Therefore, completion of the SEDEX SAQ completed by SCS is a substantial measure of continuous improvement year on year. Below is an explanation of how scoring is calculated using the SEDEX SAQ and SCS's 2025 risk scores and management controls that will serve as our benchmark for continuous improvement.

Explanation of Scoring

Combined Risk Score /10 - calculated from inherent risk and site characteristics, adjusted for management controls and audit results. The score is broken down by pillar and highlights strengths and opportunities to focus our efforts on key areas that drive ethical and sustainable practices.

Inherent Risk Score /10 - predicts potential risks based on a country/region, and sector. Spanning all four pillars, this score is broken down by topics. It can be used as a baseline to identify and prioritise areas for improvement in operations. This score shows the natural risks of doing business in a specific country or sector. It does not include any details about individual sites.

- ◆ **Labour Standards Pillar** - assesses location and industry factors that could increase labour risks, such as vulnerable worker populations or high rates of workplace violations.
- ◆ **Health and Safety Pillar** - considers regional and industry-specific health and safety risks, including local regulations and industry accident rates.
- ◆ **Business Ethics Pillar** - assesses industry and location risks related to unethical practices, such as high corruption levels or weak regulatory oversight.
- ◆ **Environment Pillar** - examines the environmental impact of the site's industry and location, such as pollution levels or resource use that may create regulatory or compliance risks.

SCS 2025 Risk Scores

Scores are from the SCS 2025 SEDEX Self Assessment Questionnaire (SAQ), which assesses the modern slavery risks in SCS operations and supply chains. Lower scores mean lower risk.

Combined risk score

3.2/10

Low risk

Score breakdown by pillar

Highlight strengths and opportunities to help businesses focus their efforts on key areas that drive ethical and sustainable practices.

Inherent risk ● 3/10 (Low risk)

Labour standards

2.9/10

Health and safety

2.4/10

Business ethics

1.8/10

Environment

3.6/10

Site characteristic risk ● 5.6/10 (Low risk)

Labour standards

6/10

Health and safety

4.7/10

Site Characteristics Risk Score /10

Highlights potential risks based on your suppliers' SAQ responses in the Labour Standards and Health and Safety pillars. This score can be used to assess and support the implementation of policies and processes that mitigate workplace risks within your supply chain. For the Environment SAQ, site characteristics consider the type of work, business and location (e.g. proximity to sensitive areas). For the Core SAQs, risks are assessed based on the nature of the work, such as exposure to heavy machinery or hazardous materials.

- ◇ **Labour standards** - reflects labour-related risks like employment practices, workers rights and wages based on SAQ responses. High risk activities in this area can raise the score.
- ◇ **Health and Safety** - based on SAQ responses to questions about site-specific health and safety factors, such as equipment usage, handling of chemicals or accident risks.

Management Controls Score /5

This score measures how well policies or processes are in place to reduce the risks from the site characteristics. It is also based on answers in the SAQ. A Poor score of 0-0.9 indicates that there are few or no controls in place. An Advanced score of 4-5 indicates that there are exemplary controls that exceed compliance and drive innovation.

- ◇ **Labour standards** - evaluates policies and processes to ensure fair labour standards and worker protections are effectively managed.
- ◇ **Health and Safety** - reviews the adequacy of safety protocols, emergency preparedness and training efforts to manage health and safety risks on site.
- ◇ **Business Ethics** - evaluates controls against unethical practices such as anti-bribery policies, compliance with legal standards and transparent operations.
- ◇ **Environment** - looks at policies managing environmental impact, resource efficiency and waste reduction practices to align with sustainability standards.

SCS Management Controls 4.2/5 (Advanced)

Scores (0 - 5, with 5 at best) are from the SCS 2025 SEDEX Self Assessment Questionnaire (SAQ), which measures how well policies and processes are in place to reduce modern slavery risks in SCS operations and supply chains, and to target improvements.

Labour standards

4.2/5

Advanced

Health and safety

4.1/5

Advanced

Business ethics

3.6/5

Good

Environment

3.8/5

Good

Section title	Points available	Points achieved	% of points achieved	Score
Profile	5	4	80%	4.0 (Advanced)
Workplace impact	4	4	100%	5.0 (Advanced)
Management systems	34	33	97.1%	4.9 (Advanced)
Freely chosen employment	22	18	81.8%	4.1 (Advanced)
Freedom of association	8	6	75%	3.8 (Good)
Health and safety	56	48	82.1%	4.1 (Advanced)
Children and young workers	13	11	84.6%	4.3 (Advanced)
Wages	31	20	64.5%	3.3 (Good)
Working hours	19	14	73.7%	3.7 (Good)
Discrimination	41	34	82.9%	4.2 (Advanced)
Regular employment	46	36	78.3%	3.9 (Good)
Discipline and grievance	34	31	91.2%	4.6 (Advanced)
Communities and human rights	48	46	95.8%	4.8 (Advanced)
Environment	30	23	76.7%	3.9 (Good)
Business ethics	10	7	70%	3.5 (Good)

SCS 2025 Key Performance Indicators

Over the 2025 reporting period, SCS continued to implement the ACAN Modern Slavery Risk Management Program and measure effectiveness across Key Performance Indicators.

Progress was made in e-learning and awareness raising, with 367 additional staff completing the Modern Slavery 101 online course via our PHRIS Learning Management System.

The performance metrics for SCS's modern slavery risk management program in 2025 show continued engagement, particularly in supplier vetting and compliance. While the total number of suppliers increased to 6,382, the identified high risk supplier count rose to 3,044, reflecting the enhanced

categorisation using the updated ACAN risk taxonomy. Supplier engagement through the ACAN Supplier Surveys remained high at 1,536 completions.

A significant increase was observed in key compliance indicators, with the number of suppliers invited to join Sedex at 117, 133 actually joining, and 187 Sedex Self-Assessment Questionnaires (SAQ) completed — a substantial increase from 81 in the previous year. Furthermore, the focus on high risk areas resulted in 19 social audits completed and 151 corrective actions issued, demonstrating a proactive approach to risk mitigation and remediation within the supply chain, particularly compared with 54 corrective actions in 2024.

	ACTIVITY	2023	2024	2025
INTERNAL / STAFF	Hours spent on modern slavery activities	325	260*	270*
	Individual staff completed e-learning	463	592	367
	Number of MSWG meetings	9	9	6
	E-learning modules completed	463	959	371
EXTERNAL / SUPPLIER ENGAGEMENT	Total number of suppliers	6805	5197	6382
	Number of suppliers with visible contact information and ABN	7258	5150	6310
	Number of suppliers across high risk categories	2952	2571	3044
	Number of ACAN Supplier Surveys completed	963	1576	1536
	Supplier staff attending capacity-building webinars	86	105	34
	Invited to join Sedex	267	186	117
	Joined Sedex	52	151	133
	Sedex SAQ completed	24	81	187
	Social audits	3	11	19
	Corrective actions	28	54	151

* Hours attributed to the Modern Slavery Liaison Officer only, excluding work done on producing the Modern Slavery Statement

2025 KPI	2025 Target	Progress
Number of MSWG meetings in 2024	6 (bi-monthly)	6 meetings
Deliver SCS MS Statement to SCS Audit & Risk Committee (ARC) and SCS Board	May 8, 2025 (ARC) May 21, 2025 (Board)	Completed
Delivery of MS Briefing Papers, including Risk Register, to SCS ARC	May 8, 2025	Completed
Number of new SCS staff to have completed the MS 101 training module via the onboarding program	All new SCS Central Office Staff, Principals, Business Managers, and School Finance Staff	In progress
Number of training events attended by MSWG member(s)	Attend 6 MS Webinars (e.g. ACAN)	Completed
Celebration activities for the Feast of St Bakhita	Feb 11, 2025	Completed
Social media, schools, students & staff, suppliers, inclusion in Units of Work	Ongoing	Ongoing
Number of suppliers who completed the ACAN Supplier Survey	500 additional suppliers	1536 suppliers
Number of high risk suppliers who have joined SEDEX	75 additional suppliers	133 suppliers
SAQ completions in Sedex	50 additional SAQs	187 SAQs
Number of policies and procedures that DO NOT include MS clauses where required.	0	0
Number of non-SCS-standard contracts that DO NOT include MS clauses (where relevant).	0	0
Social Compliance Audits	3	19* Completed
Percentage of modern slavery cases identified that were effectively addressed (remediated), or are in the process of being addressed, using an SCS Corrective Action Plan.	100%	Completed

* includes audits of SCS suppliers initiated by ACAN.

SCS Future measures of effectiveness

As part of the SCS Modern Slavery Action Plan for 2025 and beyond, and considering insights from our partnership with ACAN, the key focus areas are:

- The continued enhancement of supply chain visibility by encouraging and incentivising suppliers in high risk categories to complete the ACAN Pre-assessment Survey and, where appropriate, join the SEDEX platform.
- Efforts to raise awareness of Modern Slavery in schools via staff professional development, onboarding programs, and new curriculum units.
- Conducting social compliance audits for in-school cleaning service providers to assess adherence to Fair Work and Modern Award payment obligations, Working with Children Checks, and Workplace Health and Safety (WHS) standards.
- Expanding investigations into the supply chains of uniform and canteen suppliers to identify potential risks related to subcontracting, ethical sourcing, and modern slavery.

KPIs will continue to be developed in collaboration with respective MSWG members.

Criteria 6

Process of consultation

The SCS Modern Slavery Working Group has the following representatives:

- Director of Finance and Property (Chair)
- Chief Financial Officer
- Manager, Property & Facilities
- Procurement Manager
- Contracts Manager
- Legal Counsel, commercial law
- Supervisor: Education Leadership and Research
- Supervisor: People & Culture Operations
- K-12 Religious Education Officer
- ICT Executive Assistant
- ACAN Representative
- Finance Projects Manager
(Modern Slavery Liaison Officer)





Criteria 7

Other

No other relevant information.

APPENDIX A

Timeline of SCS 2025 activities

Date	Activity
Jan 30	SCS Modern Slavery Working Group Meeting (MSWG)
Feb 6	ACAN Monthly Webinar
Feb 11	Commemoration and Mass for the Feast Day of St Bakhita, patron saint of victims of modern slavery and human trafficking
Feb 12	Webinar: Practical insights into SEDEX SMETA 6.1 v SMETA 7
Mar 6	ACAN Monthly Webinar
Mar 11	Workshop: SEDEX Consultation on SMETA Guidance Changes
Mar 12	SCS Modern Slavery Working Group Meeting
Mar 26	SEDEX Product Roadshow
Mar 28	Webinar: SEDEX SMETA 7 – An auditor's view
Apr 2	SCS Modern Slavery Working Group Meeting
Apr 3	ACAN Monthly Webinar
May 1	ACAN Monthly Webinar
May 8	SEDEX Webinar: Deep dive into social compliance audits
May 20	Day 1: Online Anti-slavery Forum, Office of the NSW Anti-Slavery Commissioner
May 21	Day 2: Online Anti-slavery Forum, Office of the NSW Anti-Slavery Commissioner
May 21	SCS Board approves the 2024 CAS and SCS Modern Slavery Statement
May 23	A Supplier Audits cross-functional working group is established to review subcontracting practices in the SCS supply chain
Jun 5	ACAN Monthly Webinar
Jun 12	ACAN Modern Slavery Category Committees meeting
Jun 16	ACAN Modern Slavery Liaison Officer (MSLO) webinar
Jun 24	Supplier Audits cross-functional working group meeting

Jul 3	ACAN Monthly Webinar
Jul 11	Webinar: ACAN Program Open Forum
Jul 14	SCS MSWG Quarterly email
Jul 17	Supplier Audits cross-functional working group meeting
Jul 30	Webinar: Unmasking the True Cost of Online Scams - World Day Against Trafficking in Persons
Aug 7	Modern Slavery Working Group Meeting
Aug 7	ACAN Monthly Webinar
Aug 14	Day 1: ESG Procurement conference, including Modern Slavery presentation by ACAN Modern Slavery Survivor advocate, Moe Turaga
Aug 15	Day 2: ESG Procurement conference, including Modern Slavery panel session highlighting the work of Domus 8.7
Aug 21	Supplier Audits cross-functional working group meeting
Sept 4	ACAN Monthly Webinar
Sept 25	Supplier Audits cross-functional working group meeting
Sept 26	SEDEX "Meet the AAC's" workshop
Oct 2	ACAN Monthly Webinar
Oct 15	Webinar: A victim-survivor centric approach to labour exploitation in Australia
Oct 16	Supplier Audits cross-functional working group meeting
Nov 5	Day 1: Building Freedom Together – Anti Slavery Forum 2025, Office of the NSW Anti-Slavery Commissioner
Nov 6	Day 2: Building Freedom Together – Anti Slavery Forum 2025, Office of the NSW Anti-Slavery Commissioner
Nov 6	ACAN Monthly Webinar
Nov 7	Modern Slavery session at the SCS Business Operations Manager's Workshop
Nov 10	Distributed the 2024 CAS and SCS Modern Slavery Statement to all SCS Directors and School Principals
Nov 12	Modern Slavery Working Group Meeting
Nov 13	Chris Evans, the Australian Anti-Slavery Commissioner, addressed the Sydney Catholic Business Network at the Catholic Business Network Luncheon
Nov 14	Webinar: ACAN Risk Management Program Open Forum
Nov 21	Supplier Audits cross-functional working group meeting
Nov 28	Research interview with Griffith University on Construction Modern Slavery Supply Chain Risks.
Dec 4	ACAN Monthly Webinar
Dec 11	Supplier Audits cross-functional working group meeting



Modern Slavery Statement

1 January 2025 - 31 December 2025

Sydney Catholic Schools
Level 23, 680 George Street
Sydney NSW 2000

PO Box 20277
World Square NSW 2002

Phone: (02) 9569 6111
www.sydccatholicsschools.nsw.edu.au



Modern Slavery Statement 2025

1 January 2025 - 31 December 2025



Disclosure Notice

This statement has been made on behalf of Catholic Education Northern Territory. This Statement covers all entities owned or controlled under the Catholic Church Diocese of Darwin Education Property Trust ABN 58 600 950 933 – <https://www.ceont.catholic.edu.au/> – 17 Beaton Road, Berrimah Darwin NT 0828 The contact email for Modern Slavery enquiries and concerns is whs.support@nt.catholic.edu.au.

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Bishop's Address



On behalf of the Catholic Education Northern Territory, we continue our commitment to helping eradicate modern slavery.

Although modern slavery is illegal everywhere, millions of people continue to be forced into slavery and subsequently stripped of their human rights and their dignity. People are recruited and maintained in modern slavery due to vulnerabilities, poverty, corruption and systems that create coercive control and abuse.

Modern slavery is also a painful part of Australia's history. The impacts of colonisation have deeply affected Aboriginal and Torres Strait Islander peoples, resulting in the loss of land, language, and culture. Many families were separated through government policies, leading to significant intergenerational trauma and a loss of dignity and rights. We acknowledge this history as we continue to listen, learn, and walk alongside our First Nations peoples in a spirit of reconciliation and healing.

Pope Leo XIV has condemned the scourge of modern slavery, which has taken even more disturbing forms in our online societies. In his message for the World Day, marked on Sunday, February 8, 2026, the Pope renewed the Church's "urgent call to confront and bring an end to this grave crime against humanity." Pope Leo XIV reinforces the message of the late Pope Francis, "Modern slavery... is a crime against humanity", and the Diocese of Darwin joins the collective effort to educate others and work together to end modern slavery in whatever form it takes (Pope Francis, Ceremony for the signing of the Faith Leaders Universal Declaration against Slavery, 2014).



Yours in Christ,



+Charles Gauci
Bishop of Darwin & the NT

Leadership Approval

This Modern Slavery Statement was approved by the principal governing body of Catholic Education Northern Territory as defined by the Modern Slavery Act 2018 (Cth) ("the Act") on 07 April 2026

This modern slavery statement is signed by a responsible member of Catholic Education Northern Territory as defined by the Act.



Paul Greaves
Director of Catholic Education Northern Territory

07 April 2026

Criterion 1 : Catholic Education Northern Territory

About Catholic Education Northern Territory

Catholic Education Northern Territory (CENT) supports and operates eighteen (18) schools based in Darwin urban areas, regionally in Katherine and Alice Springs and in the remote communities of Ltyentye Apurte, Naiyuu, Wurrumyunga and Wadeye. CENT schools also support and manage 9 Early Learning Centres (ELC), 9 Outside School Hours Care (OSHC) Services and 4 Remote Preschools. These schools service early learning, Primary, Middle and Secondary students. CENT also supports St Joseph's Flexi-Learning Centre in partnership with Edmund Rice Education Australia located in Alice Springs. CENT also operates one RTO/VET location to support the communities in Darwin and surrounding regional areas.

The Northern Territory has the highest Aboriginal population in Australia, and education in remote communities is an important part of the diversity that defines the Northern Territory. CENT educates from Transition to Year 12 and has 5343 students including 1676 Indigenous (31.4%). CENT employs 1494 workers across its operations, including teachers supported by non-teaching and Indigenous Education Workers and Early Childhood Education and Care staff in our Preschools, ELC and OSHC Services.

CENT education office has 76 staff members providing support to schools in areas of Pastoral Care & Wellbeing, Teaching and Learning, Curriculum, Inclusion Support, Catholic Identity and the coordination of support services of ICT, HR, Safety, Finance and Infrastructure and Marketing.

CENT's Vision:

Inspired by the Gospel of Jesus Christ, we commit to educational excellence, equity and fullness of life for all.

CENT's Mission:

Through servant leadership, we witness Gospel values in a faith community, integrating life and learning in a culture of care, collaboration and excellence.

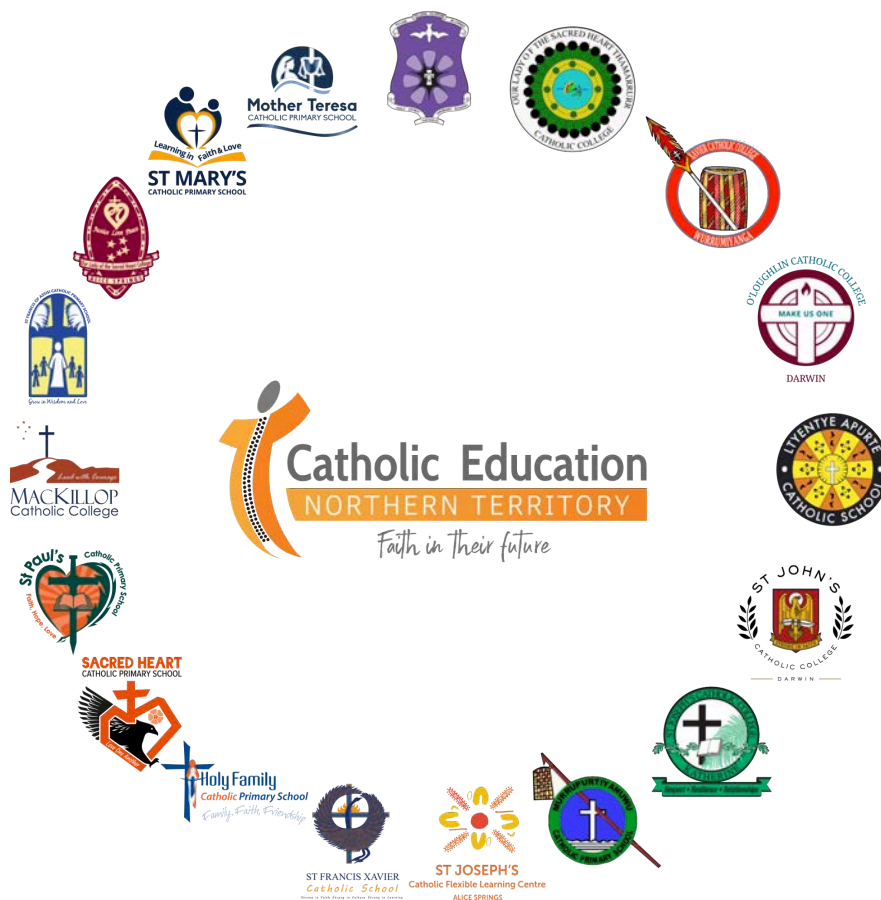
CENT's Values

Wisdom leads to Justice, which is expressed in Courage, Compassion and love.

Our Values:
LOVE **COMPASSION**
WISDOM **COURAGE**
JUSTICE

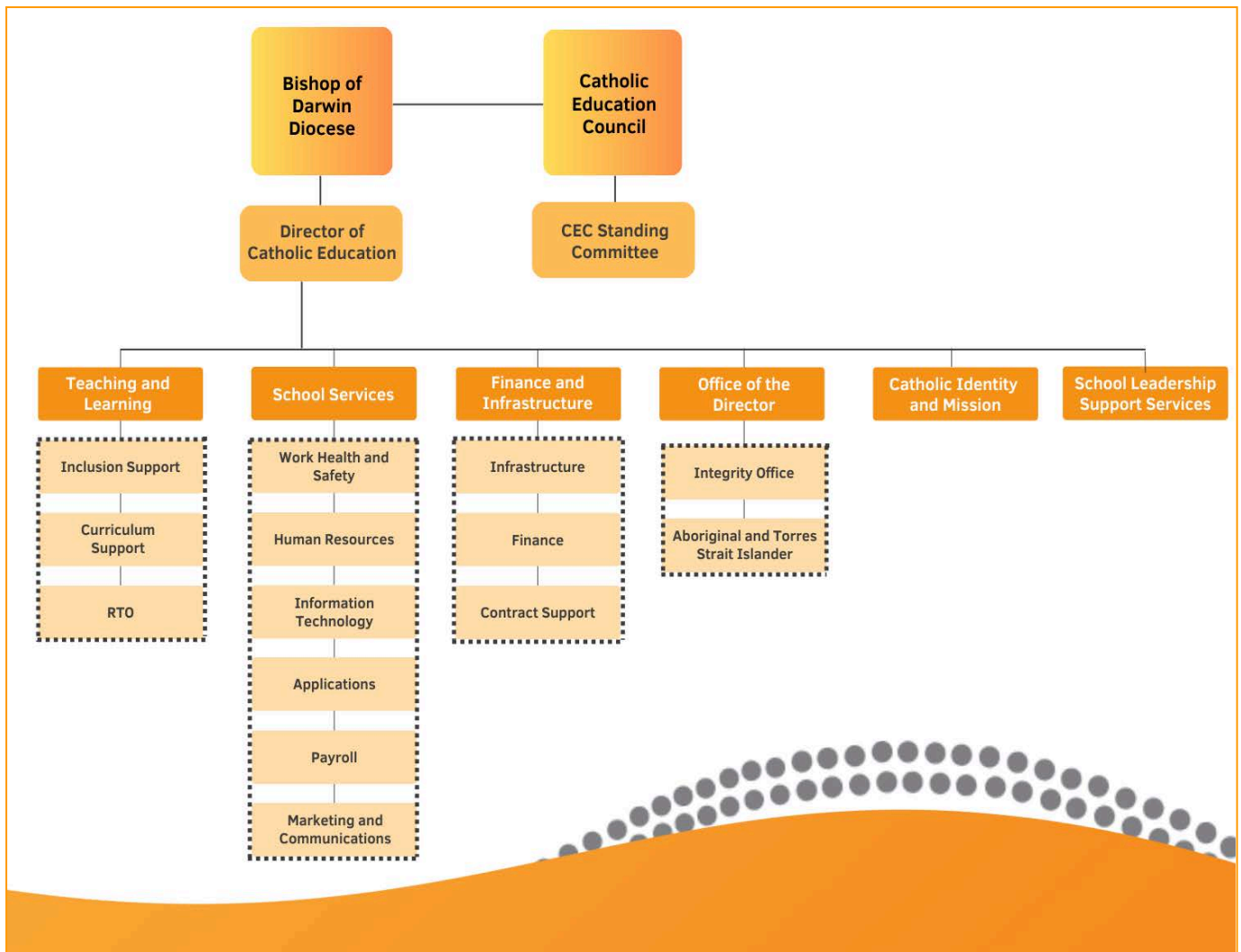
CENT Entities

Entity Name	ABN
Catholic Church Diocese of Darwin Education Property Trust	58 600 950 933
Catholic Education Office	22 616 685 167
Our Lady of the Sacred Heart Catholic College	24 635 994 048
St Francis Xavier Catholic School	51 776 150 284
Holy Family Catholic Primary School	17 624 608 900
Holy Spirit School Catholic Primary School	49 758 636 720
St Joseph's Catholic College	59 349 106 472
Ltyentye Apurte Catholic School	38 684 620 361
Murrupurtiyanuwu Catholic Primary School	83 595 212 973
O'Loughlin Catholic College	22 969 854 283
St Francis of Assisi Catholic Primary School	34 189 459 642
Sacred Heart Catholic Primary School	21 849 524 313
St John's Catholic College	70 855 099 082
St Mary's Catholic Primary School	29 197 914 637
St Paul's Catholic Primary School	75 807 963 110
Our Lady of the Sacred Heart Thamurrurr Catholic College	35 744 622 695
Xavier Catholic College	97 102 844 821
Mother Teresa Catholic Primary School	15 466 737 018
MacKillop Catholic College	80 042 512 230



Criterion 2: Our Structure, Operations and Supply Chains

Our Organisational Structure



Governance Framework

The Catholic Church Diocese of Darwin Education Property Trust is the registered approved authority for schools within CENT. The Bishop of the Diocese of Darwin is the trustee of the above Trust and has canonical authority for the operation of schools within the System, and ultimate responsibility for the delivery of Catholic education within the Diocese.

The Bishop of Darwin Diocese has delegated authority to the Director, Catholic Education (CENT), to assist the Bishop to discharge his canonical duties with respect to Catholic education. The Director of Catholic Education ensures all civil law responsibilities associated with systemic financial accountability, legislative compliance including safety, contract management and people management are adhered to.

In undertaking the Director's duties and fulfilling his responsibilities, the Director consults with the Bishop, and works with the Catholic Education Council in relation to matters of policy and fiscal accountability and educational compliance. The Director provides regular updates to the Bishop on matters of operational significance, including Modern Slavery.

The Catholic Education Council (CEC) is established to support and advise the Bishop on his responsibilities for Catholic schools in the Diocese. The Council advises and makes recommendations to the Bishop but does not make decisions. The Council is not an incorporated body. CEC members are selected from key stakeholder groups in the Diocese.

To support this Governance Framework, the CENT Modern Slavery Working Group (MSWG) was formed to provide Leadership and CENT workers with information on and support Modern Slavery Risk Management within the organisation. Meetings will be held once per term, and meeting minutes will be shared with the CEO Executive Team, who will provide escalations to the CEC as required. The membership of the MSWG includes

- Modern Slavery Liaison Officer (MSLO)
- Finance Manager
- Contract management
- WHS Manager
- Human Resources Manager
- Infrastructure Manager
- Deputy Director School Services – Member of the CEO Executive

CENT Operations

CENT's vision and mission is to provide Catholic Education across the NT for students across 18 schools comprising 4 Secondary Colleges, 5 Composite Colleges, 9 Primary Schools, 2 VET Centres and 1 flexible learning centre. Within the system there are also 9 Early Learning Centres, 9 Outside School Hours Care facilities and 4 remote Pre Schools. The Catholic Education Office supports the network of services from its Berrimah Head Office.

CENT Operations Revenue for 2025 was \$200 million. This was funded by the collection of school fees and supplemented by the State and Commonwealth Government.

Our Operations include the management and maintenance of housing facilities in remote locations. CENT also operates a Boarding facility in Darwin at St John's Catholic College and has a number of international students supported through homestay arrangements.



Travelling to remote communities can be difficult, especially in the wet season (October to February), when rivers flood and communities become isolated. Staff travel to and from these communities regularly and often can be delayed when requiring travel by aircraft. In the wet season roads are flooded and impassable, and during the dry season dirt roads are accessible only by four-wheel drive vehicles.

The high-level services provided through the Catholic Education Office include, but are not limited to:

- Specialist Education Support
- Financial Administration
- Safety (WHS)
- Human Resources Management
- Master Planning and Facility Maintenance
- ICT Services
- Compliance Reporting
- Advertising and media support
- Vocational Training programs



CENT People

The employee demographic in Darwin and NT in general is culturally diverse and representative of many nationalities across the globe, including Africa, Europe, Asia and Oceania. With a strong Aboriginal and Torres Strait Islander workforce representative in all schools.

CENT employees are engaged full-time/part-time and casually or on fixed-term contracts. Staff turnover can vary from year to year when staff elect to return to interstate of origin at the end of the contract period.

Teaching and school support staff are employed under an Enterprise Bargaining Agreement with Catholic Education Office and school leaders are employed on fixed-term contractual arrangements.

Award conditions are monitored and updated as regulations change and are implemented within the required timeframes and communicated to all staff through the regular communication channels. Staff have a number of avenues to address queries or issues in relation to their employment or conditions. They are encouraged to maintain professional, open and productive relationships with their supervisor and are encouraged to address issues in a collaborative, collegial manner.

CENT requires all staff to abide by the Sharer's of the Vision and CENT Code of Conduct to ensure that our workplaces are safe and supportive. CENT provides a confidential Employee Assistance Program to support staff wellbeing during times of personal distress and trauma and for work-related issues. This service is provided through Catholic Care Counselling Services.

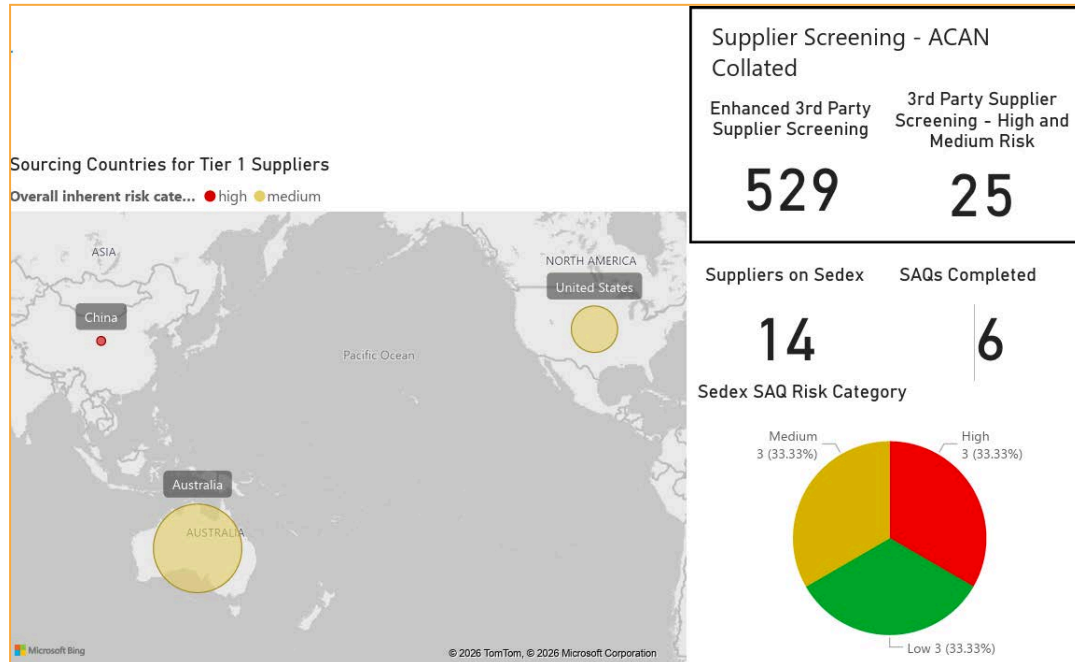
CENT Supply Chain

CENT procures goods and services for the education of students within the areas of:

- Infrastructure, maintenance and capital planning
- ICT and consulting services
- Office supplies, including teaching and learning consumables

- Fixtures, fittings and building materials
- Engagement of services through the Indigenous Land Councils
- Education and legal consulting services

CENT operates a “Territory First” supplier engagement policy with secondary suppliers selected from Australia rather than overseas.



Criterion 3: Modern Slavery Risks

Risk Assessment Approach

CENT utilises modern slavery risks as defined by the ACAN Category Risk Taxonomy, a classification standard that identifies the severity of actual or potential harm to people (saliency) in spending categories.

The ACAN Category Risk Taxonomy is based on sources such as:

- the Global Slavery Index
- the International Labor Organisation (ILO), including definitions of modern slavery
- the Bureau of International Labor Affairs (ILAB), U.S Department of Labor
- the Global Child Forum and UNICEF

Five key factors are also used to determine the level of risk:

- Geography: the country or location where a good is made or service is delivered
- Industry: the sector in which the making of goods or delivery of service occurred
- Commodity: the raw materials or components that comprise the goods or products
- Workforce vulnerability: such as bonded visas, temporary migrants, women or children known to be employed in specific industry sectors
- Domus 8.7: trends, cases, and risk intelligence identified through the Domus 8.7 remediation service, including grievances and remediation insights relevant to category and risk to workers.

High-Risk Suppliers

Through the ACAN program, CENT continued to focus on suppliers of labour and the operational risks associated with the following labour services procurement:

Cleaning & Security Services

The cleaning and security sectors typically employ temporary migrant workers engaged via subcontracting arrangements with a high rate of noncompliance with workplace rights and entitlements. Equipment and consumables used in these sectors are largely manufactured overseas, predominantly in high-risk countries.

Facility Management & Property Maintenance

The labour force used in facilities management generally consists of temporary migrant workers, who are often contracted through labour hire companies.

Labour Hire

Labour hire services pose a high risk for worker exploitation and modern slavery for several reasons, including:

- focus on low-skilled, low-paid, seasonal, temporary labour

- recruitment of potentially vulnerable people such as new migrants, temporary work visa holders, international students and undocumented workers
- deceptive and opaque practices trapping workers into exploitative situations
- demanding excessive fees for visas, travel and other work arrangements, leading to debt bondage
- coercive control, threats, withholding workers' identity documents to limit their freedom of movement and social isolation from community

Waste Management Services

The waste industry (including recycling) is a dangerous sector for workers with significant WHS risks such as exposure to toxic materials and pathogens, use of heavy machinery and dirty work environments. Modern slavery risks are similar to those faced by cleaners. Subcontracting to small waste management companies is common across the sector, as is the use of labour hire. Waste collection, handling, and material recovery facilities use migrants and low-skilled workers.

High-Risk Suppliers

CENT has taken a number of steps to assess Modern Slavery risks in its operations. In the delivery of educational services across the school system, CENT procures goods and services from a range of industries and engages in a broad range of activities to achieve its strategic objectives. In 2025, CENT engaged the products or services from 1648 suppliers across our 20 sites with a total spend of \$60.9 million.

CENT assessed the risk exposure within CENT's expenditure and identified over 60% of suppliers fall within the high-risk category with a spend of +\$1 million.

High Risk Category	No. Suppliers	\$ Spend	% of CENT Total Spend
Building and Construction	16	16.67 Mil	26.89%
Cleaning and Security Services	8	4.46 Mil	7.19%
Facility and Property Maintenance	12	2.9 Mil	4.68%
Food and Catering Services	5	2.49 Mil	4.01%
Furniture & Office Supplies	3	4.34 Mil	7.00%
ICT Hardware	6	1.5 Mil	2.42%

Criterion 4: Steps Taken To Address Modern Slavery Risk

Supplier Engagement

CENT shared supplier information with the national network of Catholic schools for centralised supplier engagement by ACAN. This approach reduces duplication and provides consistent communication to suppliers, on behalf of Catholic schools, enabling a systematic and comprehensive supply chain risk assessment.

CENT utilises the new purpose-built data management platform – ROTA. ROTA centralises the ACAN Risk Management Program framework and facilitates supplier performance evaluation and engagement.

1. Evaluation of the modern slavery risk within operations and supply chains, using the ACAN Risk Taxonomy
2. ACAN Supplier Survey to identify supplier revenue, number of employees, countries of origin for goods sourced overseas, workforce contractual arrangements and Sedex membership status.
3. Supplier education on modern slavery and risk management in key areas: cleaning, building and construction, procurement of labour, labour hire and services, sourcing goods from overseas, grievance mechanisms and remediation
4. Onboarding suppliers to Sedex requires a business address, contact details and goods or services provided
5. Sedex Self-Assessment Questionnaire (SAQ) helps suppliers to evaluate their practices against established standards and identify areas for improvement
6. Desktop review to identify key actions required from suppliers
7. Enhance supplier screening using Know Your Client (KYC) intelligence software
8. Corporate Social Compliance Audits provide a point-in-time, objective and independent verification process of supplier alignment with local laws and worker wellbeing standards
9. Domus 8.7 Index modern slavery statement assessment on selected suppliers in high-risk categories
10. ACAN Prequalified Supplier Directory - a list of preferred suppliers accessible to Catholic organisations

Internal Capacity Building

During 2025, the designated CENT Modern Slavery Liaison Officer (MSLO) participated in the ACAN Program activities, webinars and training sessions. The MSLO holds the responsibility for coordinating overarching operational activities in the identification and mitigation of modern slavery risks within the CENT. This included completing the SEDEX Self-Assessment Questionnaire for CENT, which produced a management controls score of 4.4.

With the implementation from 2024 of expanded training requirements for all staff to participate in Modern Slavery online training through GRC's Compliance Learning Management System (SALT). In mid-2025 ACAN supplied updated modules, and following a pause of the training in Q4 to allow for the new modules to be loaded into the system, the training will recommence at the start of 2026. This training program incorporates all General, Finance, Teaching and Leadership Staff being assigned the Modern Slavery 101 module, with Leadership and Finance workers required to complete an expanded course including the Grievance Mechanisms and Remedy and Business Relevance.

E-Learning Module	Total Modules Completed	
	FY 2024	FY 2025
Modern Slavery 101	856	859
Implementing a Modern Slavery Risk Management Program	30	25
Grievance Mechanisms and Remedy	30	37
Business Relevance	31	36
Modern Slavery Risk Management for Suppliers	20	36

As part of CENT's Modern Slavery Actions for 2025 to improve supplier engagement and, in collaboration with the Contracts Manager, building on the work completed in 2024 of standardising contract templates. CENT commenced work to include standard terms and conditions into the processes for engagement of suppliers not under contracts.

The Finance and Infrastructure team completed a review of their procurement policies and procedures, which have now been shared within the organisation, referencing Modern Slavery risks, identification and actions involved in these activities

- CENT Procurement Policy and Procedure
- CENT Infrastructure Procurement Policy and Procedure

Remediation

A documented remedy pathway is an important requirement of the Modern Slavery Act.

Through the ACAN Program, CENT has access to the expertise and independent advice available through Domus 8.7. CENT can make referrals of people impacted by modern slavery to obtain support, advice and guidance on how to respond to concerns.

The right to remedy is a basic principle in international human rights law. The provision of remedy involves a business implementing actions and processes to investigate and redress negative impacts on people involved in business operations and supply chains and ensure future incidents are prevented.

CENT is a founding member of Domus 8.7. Domus 8.7 was established as an agency of the Catholic Archdiocese of Sydney in 2020 as a key element of the ACAN Modern Slavery Risk Management Program. This collaborative approach to remediation is aligned with the Modern Slavery Act and Catholic Social Teaching, which are centred on the needs, wellbeing and empowerment of people impacted.

Domus 8.7 provides CENT:

- resources that enable us to listen to workers (grievance channel)
- a 24/7 careline for workers on our sites, staffed by professional counselors
- direct support to people impacted by modern slavery
- guidance and technical assistance to prevent, identify and remediate modern slavery

- a documented process to assess if an organisation has caused, contributed or is directly linked to modern slavery and modern slavery indicators

Domus 8.7 empowers people impacted by modern slavery to have choice and control over what forms of remediation are meaningful to them and to engage safely with business/supply chain actors. Supports may include:

- modern slavery indicator assessment
- needs assessment, case coordination, response and remediation planning
- referrals to community, social services, unions
- transport, accommodation, financial and food support
- legal support, referrals, accompaniment and advocacy
- job training, retraining and redeployment
- accompaniment and advocacy to engage with government and law enforcement agencies
- opportunities to contribute lived expertise to improve modern slavery responses

The Domus 8.7 Advisory Committee Members also include a person with lived expertise, Mr Moe Turaga. Domus 8.7 is a registered charity with the Australian Charities and Not-for-profits Commission (ACNC) and is an endorsed Public Benevolent Institution with Deductible Gift Recipient (DGR) status. ABN 244 72497189

Criterion 5: Effectiveness of Steps Taken

Continuous improvement

Collaboration is at the heart of accelerating progress. This also includes opportunities to comparatively measure social, environmental and governance (business ethics) risks and actions with peers in our network.

In its foundational stages, CENT used an internally devised ACAN framework to measure progress. This bespoke approach reflected the unique priorities, constraints, and practices across Catholic organisations.

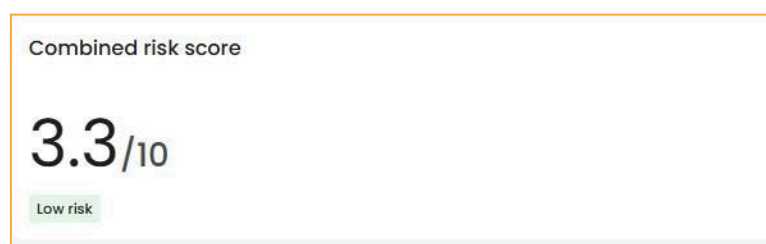
In 2025, the ACAN Program adopted a globally recognised risk measurement system through SEDEX. This aligns reporting entities with a methodology that combines global data about risks in different countries and industries with site-specific information from the SEDEX platform. SEDEX regularly updates the methodology to ensure it is aligned with new and emerging risks. Therefore, completion of the SEDEX SAQ completed by CENT is a substantial measure of continuous improvement year on year. Below is an explanation of how scoring is calculated using the SEDEX SAQ and CENT 2025 risk scores and management controls that will serve as our benchmark for continuous improvement.

As part of CENT's partnership with ACAN, review of our top 100 suppliers was conducted to identify potential Modern Slavery risks using the Refinitiv World-Check Risk Intelligence data. This identified potential risks with our suppliers which then allowed CENT to review, with ACAN, actions that may be required to further mitigate these risks or if required discontinue the engagement of the supplier/s. Of the top 100 only 4 suppliers were identified with potential historical risks however they were not engaged in the capacity under which the risks were identified or the supplier has since remedied these.

Explanation of Scoring

Combined Risk Score 0/10

Calculated from inherent risk and site characteristics, adjusted for management controls and audit results. The score is broken down by pillar and highlights strengths and opportunities to focus our efforts on key areas that drive ethical and sustainable practices.



Source: Sedex SAQ

Inherent Risk Score 0/10

Predicts potential risks based on a country/region and sector. Spanning all four pillars, this score is broken down by topics. It can be used as a baseline to identify and prioritise areas for improvement in operations. This score shows the natural risks of doing business in a specific country or sector. It does not include any details about individual sites.

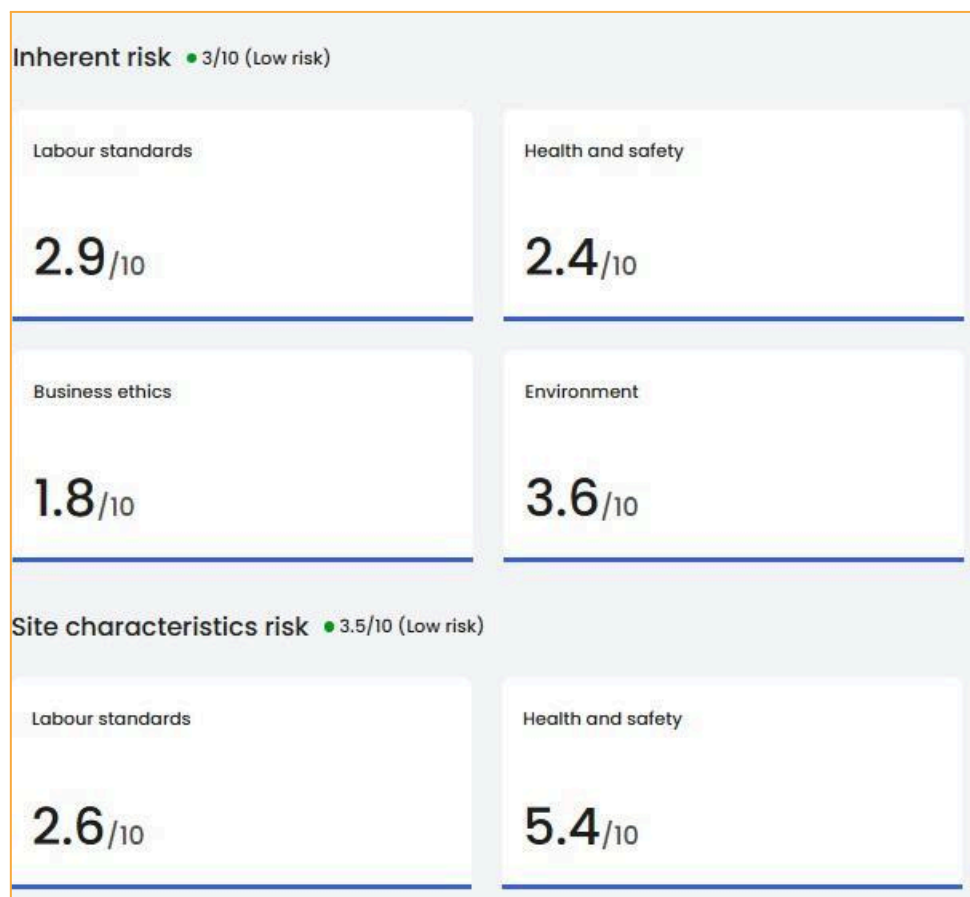
- Labour Standards Pillar – assesses location and industry factors that could increase labour risks, such as vulnerable worker populations or high rates of workplace violations.

- Health and Safety Pillar - considers regional and industry-specific health and safety risks, including local regulations and industry accident rates.
- Business Ethics Pillar - assesses industry and location risks related to unethical practices, such as high corruption levels or weak regulatory oversight.
- Environment Pillar - examines the environmental impact of the site's industry and location, such as pollution levels or resource use that may create regulatory or compliance risks.

Site Characteristics Risk Score 0/10

Highlights potential risks based on your suppliers' SAQ responses in the Labour Standards and Health and Safety pillars. This score can be used to assess and support the implementation of policies and processes that mitigate workplace risks within your supply chain. For the Environment SAQ, site characteristics consider the type of work, business and location (e.g. proximity to sensitive areas). For the Core SAQs, risks are assessed based on the nature of the work, such as exposure to heavy machinery or hazardous materials.

- Labour standards - reflects labour-related risks like employment practices, workers rights and wages based on SAQ responses. High-risk activities in this area can raise the score.
- Health and Safety - based on SAQ responses to questions about site-specific health and safety factors, such as equipment usage, handling of chemicals or accident risks.



Source: Sedex SAQ

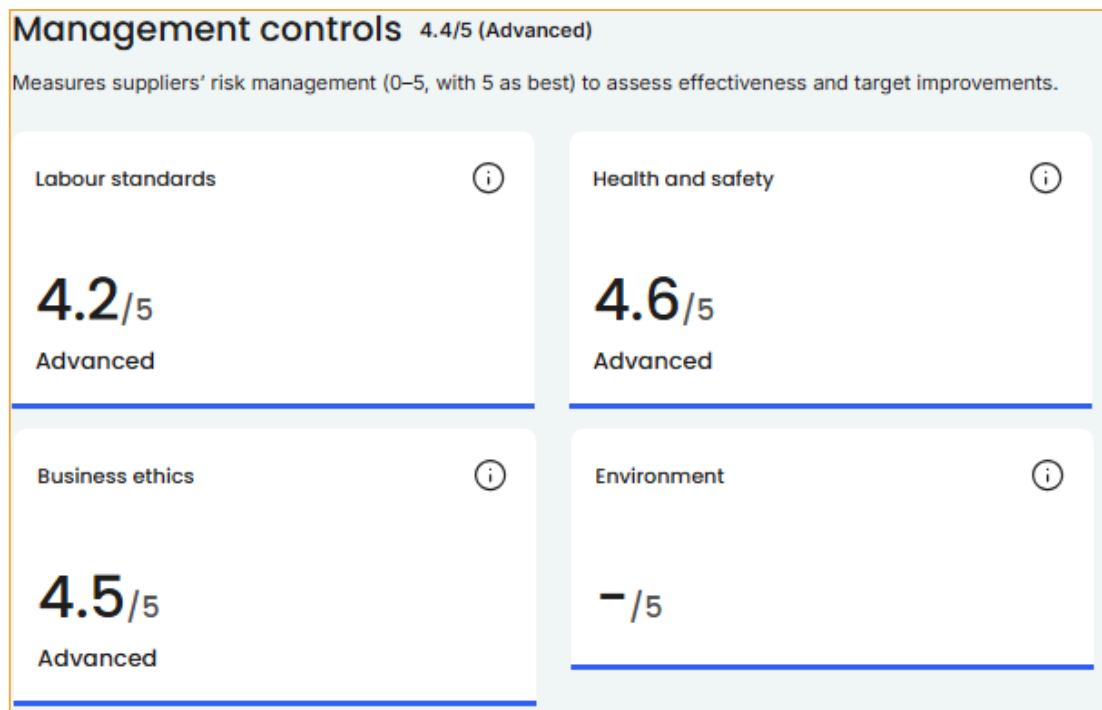
CENT and Supplier Management Controls Score 0/5

This score measures how well policies or processes are in place to reduce the risks from the site characteristics. It is also based on answers in the SAQ. A Poor score of 0-0.9 indicates that there are few

or no controls in place. An Advanced score of 4-5 indicates that there are exemplary controls that exceed compliance and drive innovation.

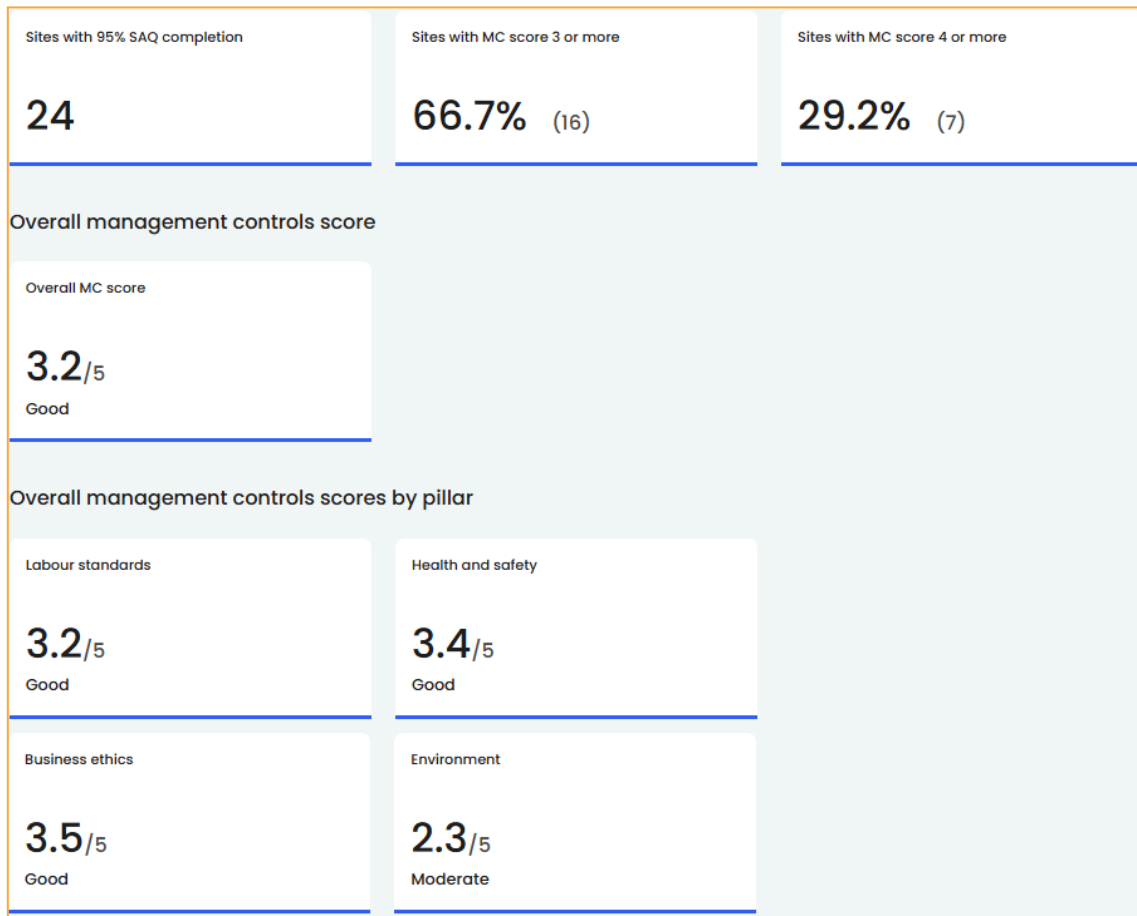
- Labour standards - evaluates policies and processes to ensure fair labour standards and worker protections are effectively managed.
- Health and Safety - reviews the adequacy of safety protocols, emergency preparedness and training efforts to manage health and safety risks on site.
- Business Ethics - evaluates controls against unethical practices such as anti-bribery policies, compliance with legal standards and transparent operations.
- Environment - looks at policies managing environmental impact, resource efficiency and waste reduction practices to align with sustainability standards.

CENT Management Control Scores



Source: Sedex SAQ - (Note Environmental SAQ was not completed)

Supply Chain Management Control Scores



Source: Sedex SAQ - Only sites with 95% SAQ completion are included in overall scores

Modern Slavery Engagement Review

	ACTIVITY	2023	2024	2025
INTERNAL / STAFF	Hours spent on modern slavery activities	1101	1101	1144
	Individual staff completed e-learning	577	586	1182
	E-learning modules completed	1222	937	1331
EXTERNAL / SUPPLIER ENGAGEMENT (Based on Top 100 by spend)	Number of suppliers with visible contact information and ABN	-	97	98
	Number of suppliers across high-risk categories	44	58	59
	Number of ACAN Supplier Surveys completed	0	19	31
	Invited to join Sedex	4	6	17
	Joined Sedex	0	12	1
	Sedex SAQ completed	0	6	0
	Social audits	0	0	0
	Corrective actions	0	0	0
DOMUS 8.7 EXTERNAL REFERRALS	Contacts made via worker voice / grievance mechanism	0	10	0
	Referrals for advice and assistance	0	0	0
	Individuals identified or referred for modern slavery assessment	0	0	0
	Individuals with modern slavery cases remediated	0	0	0

Risk Management Effectiveness

CENT has continued reviewing its supplier engagement process so that we have a better ability to capture supplier information to assist in identifying the risk for CENT and to also share this with suppliers. Plans for 2026 are to create an integrated reporting mechanism to allow timely reporting to be generated from within the multiple systems. This change will facilitate an efficient process to gather data and provide operational reporting to leadership in a consistent format. This will further improve CENT's journey of change and improve our effectiveness ratings for Modern Slavery Risk Management.

Effectiveness of Grievance and Remediation Process

Throughout 2025 there were no reported issues of grievances raised through the CENT Modern Slavery grievance process to the MSLO. This will continue to be monitored, and as required, remediation will be entered into based on the grievances raised and will be timely and, when required, escalated to the appropriate stakeholders.

Action Plan

FY 2026

As part of CENT's 2025 review, the following actions have been identified for 2026:

- Improved Supplier engagement
 - Encourage completing registration with ACAN Modern Slavery Survey
 - Implementing standard terms and conditions when engaging suppliers outside of contracts
- Develop a Risk Management Framework for CENT to further support Risk Management activities across CENT operations.
- Implement an integrated reporting mechanism across CENT System to improve Modern Slavery Risk Management.

CENT Towards 2029 Strategy

As part of our Towards 2029 Strategic Priorities of Intentional Capacity Building and Quality Governance and Sustainability, CENT will look to transition to a Preferred Supplier and Contractors operating model by the following actions:

- CEO will support the consolidation of vendors and review current contract arrangements
- Conduct Preferred Supplier review with Modern Slavery a Key Criteria in the selection process
- As contractual agreements are finalised, schools will align to the Preferred Contractor
- Centralised KPI's and Modern Slavery reviews completed during the contract cycle



Criterion 6: Internal Consultation

CENT will explore opportunities to work with other Diocesan entities on Modern Slavery activities, ensuring our work with ACAN is cohesive and coordinated. CENT does not own or control other entities.

ACAN Working Group now has the ability to lean in on Subject Matter Experts with the ability to influence all areas of the organisation to establish processes and practices that align strategies to address Modern Slavery risks. The rolling out of the ACAN Modern Slavery training packages, as mentioned above, has shown our schools are more aware of the risks of engaging with our suppliers and are encouraged to seek assistance from the WHS Support email in managing their modern slavery risks.

Schools Criterion 7: Other Information

This is the completed documentation for the CENT Modern Slavery Statement, and there is no other relevant information to provide.





ARCHDIOCESE
OF BRISBANE

MODERN SLAVERY STATEMENT

2025

The Corporation of the Trustees of the
Roman Catholic Archdiocese of Brisbane

Disclosure

This statement has been made on behalf of The Corporation of the Trustees of the Roman Catholic Archdiocese of Brisbane. This statement covers all entities owned or controlled by The Corporation of the Trustees of the Roman Catholic Archdiocese of Brisbane.

We respectfully acknowledge Aboriginal and Torres Strait Islander people as the First Peoples of this country and especially acknowledge the traditional owners on whose lands we live and work throughout the Catholic Archdiocese of Brisbane.

We also acknowledge Elders, past, present and emerging and pay tribute to those who have contributed to the social, economic, cultural, political, and spiritual life of our community.

This acknowledgement affirms our commitment to social justice and the importance of healing and reconciliation between Indigenous and non-Indigenous peoples.

ABN 25 328 758 007 Archdiocese of Brisbane

227 Elizabeth Street, Brisbane Qld 4000

ABN 49 991 006 857 Brisbane Catholic Education

ABN 25 328 758 007 Archdiocesan Development Fund

ABN 35 020 644 975 Centacare

ABN 51 626 296 801 Centacare Administration Services

ABN 24 547 377 893 Xavier Children's Support Network

ABN 88 630 274 434 Romero Centre



Modern Slavery Act 2018 (Cth) – Statement Annexure

Principal Governing Body Approval

This modern slavery statement was approved by the principal governing body of the Corporation of the Trustees of the Roman Catholic Archdiocese of Brisbane as defined by the Modern Slavery Act 2018 (Cth) ("the Act") on 1 June 2026.

This modern slavery statement is signed by the Sole Trustee ('responsible member') of the Corporation of the Trustees of the Roman Catholic Archdiocese of Brisbane as defined by the Act.

A handwritten signature in blue ink that reads "Shane Mackinlay".

Most Rev. Shane Mackinlay
Archbishop of Brisbane





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Pope Leo XIV releases a message to mark the 12th World Day against Human Trafficking, and pledges the Catholic Church's commitment to confront and bring an end to this "Urgent call to confront and bring an end to this grave crime against humanity."

"Within this broken paradigm, women and children are the most impacted by this heinous trade."

"Ultimately, the violence of human trafficking can be overcome only through a renewed vision that beholds every individual as a beloved child of God."

<https://www.vaticannews.va/en/pope/news/2026-02/pope-leo-xiv-world-day-against-human-trafficking-message.html>



A message from the Archbishop of Brisbane, Shane Mackinlay

Our Christian tradition begins with the conviction that every person is created in the image and likeness of God and is therefore endowed with a dignity that can never be taken away. That dignity does not depend on what a person owns, achieves or contributes. It is given by God and must be honoured in every aspect of our life together. This conviction lies at the heart of the mission of the Archdiocese of Brisbane and shapes our response to modern slavery in all its forms.

Pope Leo XIV has renewed the Church's urgent call to confront human trafficking and to bring an end to what he has described as a grave crime against humanity. His words remind us that exploitation takes hold wherever people are treated as a means to an end rather than as persons of inherent worth. Our commitment to addressing modern slavery is therefore an expression both of our faith and of our responsibility to ensure that dignity is upheld in the ways we operate, procure and engage with others.

Within the Archdiocese of Brisbane, we stand against the scourge of modern slavery and will continue to do so until it is eradicated in all its forms.

During 2025, we deepened understanding across our organisation of what modern slavery is and of the part each person can play in preventing exploitation and promoting ethical practice, with staff completing more than double the amount of training than 2024. This growth in awareness is an important part of building a culture in which respect for human dignity is both affirmed in principle and reflected in action.

We have also continued to mature our operational approach to identify, address and eliminate modern slavery risks within our operations and supply chains. This has included the introduction of more rigorous risk management processes and use of an expert third-party supplier that specialises in data, insights and professional services that empower supply chain sustainability. These measures build on the foundations already established and reflect our commitment to ensuring our systems remain responsive, accountable and effective as procurement environments and supply chains continue to evolve.

This work requires vigilance, perseverance and a readiness to keep learning. We are committed to ongoing continuous improvement, recognising that the pursuit of just, fair and ethical practice is not static, but must continue to develop over time. In that spirit, we renew our commitment to doing all we can to ensure that exploitation has no place in the goods and services on which we rely.

With the intercession of St Josephine Bakhita, patron saint for victims of human trafficking, may God strengthen us in this task and guide us in upholding the dignity and freedom of every person.

Yours sincerely in Christ,

Most Reverend Shane Mackinlay
Archbishop of Brisbane

Reporting Criteria 1 and 2:

The Roman Catholic Archdiocese of Brisbane

About us

The Roman Catholic Archdiocese of Brisbane (the Archdiocese) comprises parishes and agencies across South East Queensland. Our footprint covers 77,000 square kilometres from the Queensland/New South Wales border, north to Gin Gin and west to Eidsvold and Gatton. We have offices situated throughout the Archdiocese with central administration based in Brisbane. Together we provide:



235 MASS
CENTRES
SERVING
OVER **684,000**
CATHOLICS



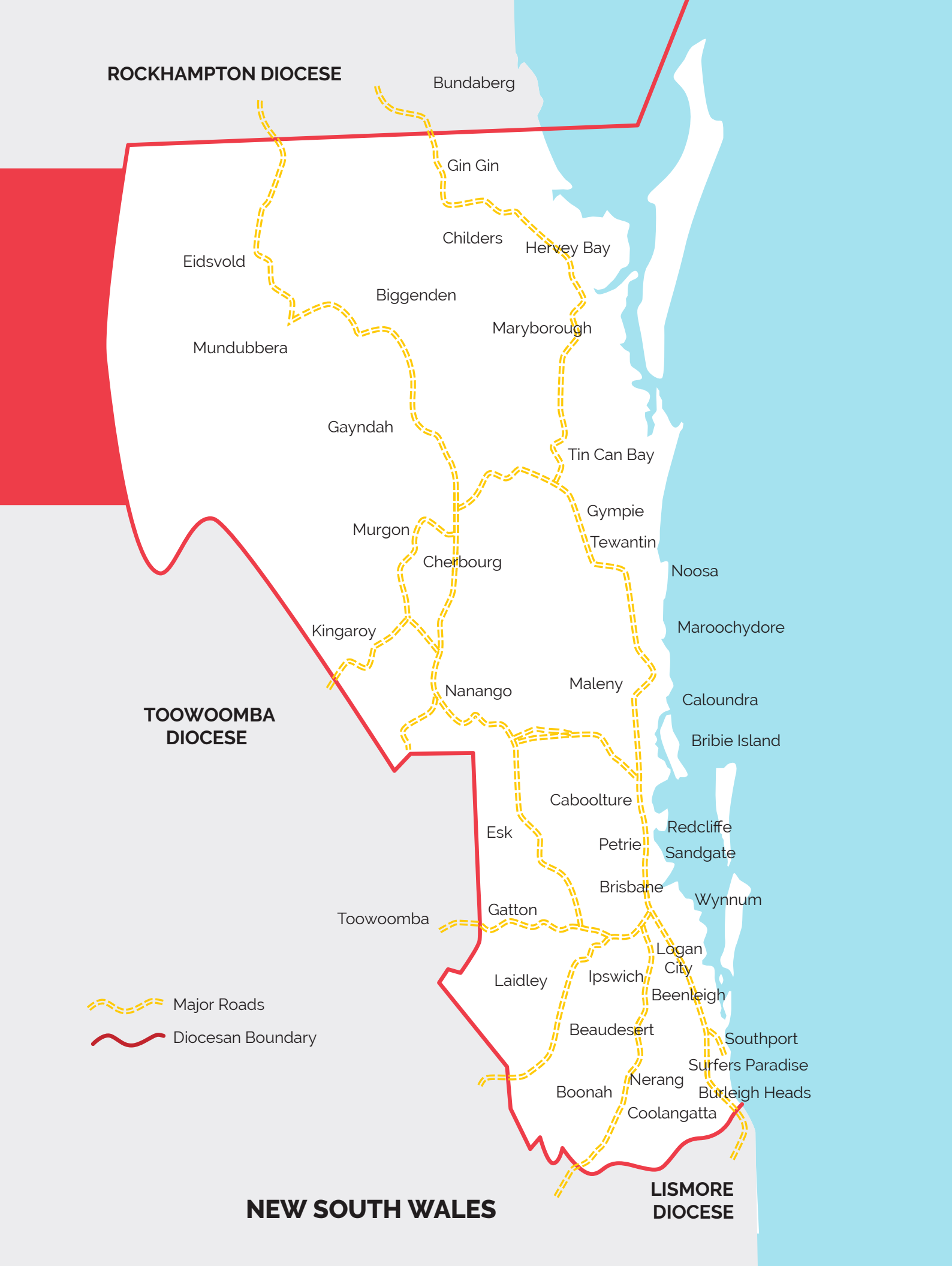
146 SCHOOLS
EDUCATING
OVER **78,015**
STUDENTS
EACH YEAR



185
CENTACARE
SITES
SUPPORTING
OVER **73,000**
PEOPLE EVERY
YEAR



40 OFFICES
EMPLOYING
OVER **14,000**
PEOPLE



The Archdiocese is led by Archbishop Shane Mackinlay following his appointment by Pope Leo XIV and installation in September 2025 and Vicar General Fr Peter Dillon. Archbishop Mackinlay has committed the Archdiocese to support Pope Leo's calls for a path toward a renewed humanity and says, "Ultimately, the violence of human trafficking can be overcome only through a renewed vision that beholds every individual as a beloved child of God,"

The Archdiocese's vision statement is, 'On a journey led by the Spirit.' There are four dimensions to this vision:

1. We are on a journey of faith into the future
2. We do not see the way ahead clearly
3. The Holy Spirit leads us on the way
4. Together we discern what paths the Spirit is opening before us.

Our Charter

Emeritus Archbishop Mark Coleridge took to heart the 2013 Papal Exhortation *Evangelii Gaudium* (The Joy of the Gospel) and adopted it as the charter for the Archdiocese. Like the universal church, the Archdiocese of Brisbane is in communion with the Bishop of Rome.

We are Catholics who:

- Embrace the person and vision of Jesus
- Build communion with God and others
- Engage in Christ's Mission in our world

These three dimensions are integral to our life as Church and remind us that our faith is anchored in Jesus Christ, who draws us into communion with God and one another and sends us forth in mission to live, share and proclaim the good news of the Gospel in our everyday lives.

Further to this foundational framework which arose out of an Archdiocesan Synod in 2003, and as we seek to plan the kind of future that Christ wants, we note the words of Pope Leo XIV on the Parish:

"We will leverage the strength, flexibility and resilience of our parishes and the faithful to stand against the unrighteous acts of modern slavery in society."

2025 modern slavery risk management initiatives

The key modern slavery risk identified by the Archdiocese is the potential for Tier 1 suppliers to be non-compliant with Australian workplace laws, particularly in relation to health and safety, excessive work hours, unpaid work, below-minimum wages, forced labour and restrictions on freedom of association.

1. The Archdiocese completed further analysis of the supply chain, including analysis through Sedex which commenced in October 2023 and remains ongoing.
2. Brisbane Catholic Education's (BCE's) Procurement has continued to apply and refine processes, tools and templates to enhance due diligence checks and the identification and management of modern slavery risks within our supply chain.
3. Throughout 2025 BCE have continued to develop category plans for its core categories. This approach has been adopted and rolled out across the Archdiocese.
4. The results of the cleaning sector trial enabled BCE to significantly strengthen due diligence during cleaning tenders, with these improvements subsequently extended to uniforms, office supplies, ICT, and furniture. In 2025, BCE:
 - Further adopted elements of the Cleaning Accountability Framework (CAF), including labour-standards and risk-mitigation principles. These include award-rate pay requirements, preference for direct employment models, pricing transparency, subcontracting oversight, and enhanced modern slavery due diligence.
 - BCE has released and updated a Cleaning Toolkit that provides schools with practical tools, templates, and checklists to support robust due diligence in cleaning procurements. The Toolkit is regularly reviewed to address emerging risks, support compliance with award rates, and strengthen controls against modern slavery and labour exploitation. In parallel, BCE has commenced a transition toward a more centrally managed approach

to cleaning services, including the development of standardised contracts incorporating modern slavery clauses and strengthened compliance requirements. These initiatives are being progressively implemented to improve oversight and ethical standards across the category.

- Building on this foundation, BCE will continue to mature its approach to cleaning services by further progressing toward a centrally managed supplier model, strengthening contract-level assurance, and enhancing ongoing supplier due diligence. Future work will focus on improving system-wide consistency, strengthening oversight of labour-standards compliance, and proportionately aligning practices with recognised frameworks such as the CAF. These actions are being implemented in stages and form part of BCE's continuous improvement approach to ethical procurement.

5. In late 2023, BCE in collaboration with the Archdiocese of Brisbane formed the Modern Slavery and Laudato Si' Reference Group that:

- Inform and advise the Archdiocese on modern slavery related issues and BCE's role in managing and mitigating modern slavery risks.
- Provide strategic direction, motivation, empowerment and leadership to ensure that every parish, school and agency of the Archdiocese understands the call to ecological conversion enunciated in Laudato Si' and responds wholeheartedly to transform their personal and institutional operations and practices to develop an integral ecology profile.
- Through the integration of Modern Slavery and Laudato Si' priorities, progress has been made in transitioning the Archdiocesan fleet from petrol vehicles to hybrid and electric vehicles. This transition commenced in 2024 and is expected to be completed by 2028 across the Archdiocese and its agencies.



Our plans for 2026 and beyond

To further our commitment to eliminating modern slavery in our supply chains and to meet our legislative requirements, the Archdiocese has significant plans for the coming years. Following the Archdiocese's Modern Slavery maturity improvements in 2025, the Archdiocese will be focusing our action plan on two key pillars, worker engagement and operations and two sub pillars, being the effectiveness of our actions and maturing our risk management.

These are summarised below and will be discussed in more detail within this Statement.

1. Expand modern slavery training utilising the updated modules developed by ACAN.
2. Conduct modern slavery seminar/presentation from victims of modern slavery.
3. The Archdiocese in collaboration with BCE will commence a review of its procurement practices in 2025-26 with the view of leveraging off the procurement practices established by BCE.
4. The Archdiocese will establish metrics across the following categories:
 - a. Building and construction
 - b. Facility management and property maintenance
 - c. Furniture and office supplies
 - d. Cleaning and security
 - e. Labour hireInitial assessments will continue to be based on BCE's review of vendors in the above categories with an annual spend greater than \$500k and the Archdiocese's review of vendors with an annual spend greater than \$100k.
5. Establish and progressively refine key risk indicators (KRI's) across our supply chain when undertaking risk assessments of vendors which can be adapted to changing business circumstances and conditions.

6. Continue the detailed review of the goods and services provided by approximately 1,000 vendors within our supply chain which will cover approximately 80 percent of our annual spend. This will also ensure accuracy in mapping vendors to the expanded ACAN taxonomy.
7. The Supplier Onboarding Project is in its final design and build stages, delivering a technical solution to capture supplier compliance with BCE's mandatory criteria, including modern slavery requirements. This will strengthen controls over supplier engagement and enable transparent reporting. BCE plans to work with existing suppliers to complete verification in the second half of 2026, with new suppliers required to verify in the Sedex solution from that date. The project also includes establishing a clear offboarding process where appropriate for suppliers that do not meet BCE's mandatory requirements, ensuring BCE only partners with suppliers that meet its obligations and standards.

Our organisational structure

The Corporation of the Trustees of the Roman Catholic Archdiocese of Brisbane is an incorporated entity in the State of Queensland established on 25 July 1935.

The agencies of the Archdiocese include (refer Figure 1):

- The Archdiocesan Development Fund
- Brisbane Catholic Education
- Centacare, incorporating Centacare Community Services, Centacare Specialist Family Support Services, Pastoral Ministries, Catholic Early EdCare and Xavier Children's Support Network
- Archdiocesan Services
- Archdiocesan Ministries.

The support offices of the Archdiocese include:

- The Episcopal Office and Clergy Support
- The Financial Administrator's Office.



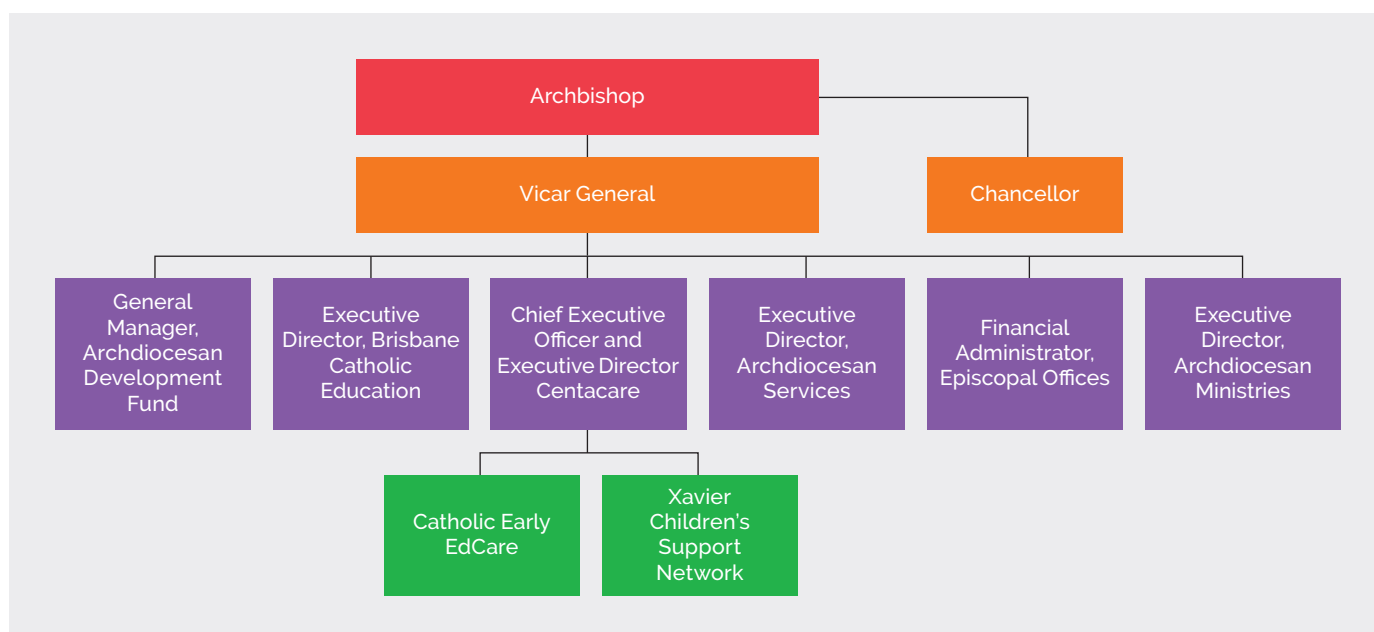


Figure 1: Archdiocese of Brisbane organisation structure

Our governance framework

The Corporation of the Trustees of the Roman Catholic Archdiocese of Brisbane is the legal entity for all parishes and agencies of the Archdiocese. The Archbishop of Brisbane is the Ordinary for the Archdiocese and has canonical authority for the operation of each of the parishes, agencies, schools and services of the Archdiocese.

The Archbishop is at the head of the governance structure (refer Figures 1 & 2). To assist in his role as Trustee, the Archbishop delegates certain responsibilities to the Vicar General, Executive Directors/General Manager of the agencies outlined below. The Executive Directors/General Managers' roles are to ensure that the civil law responsibilities associated with financial accountability, legislative compliance, risk management and people management are met.

The Archbishop, Vicar General, the Executive Directors/General Manager and the Financial Administrator form the Executive Forum. The Executive Forum meets regularly and has responsibility for all matters of operational significance, including modern slavery.

Following the successful implementation of the delegation's framework in late 2022, the

framework was implemented across the agencies of the Archdiocese and underwent some minor adjustments and clarity of definitions in 2023. This framework will be reviewed in 2026-27.

There were a number of structural changes across the Archdiocese during 2025, with the key changes being:

- Retirement of Archbishop Emeritus Mark Coleridge (September 2025)
- Installation of Archbishop Shane Mackinlay (September 2025)
- Liturgy Brisbane moved under Archdiocesan Ministries
- Appointment of new Chief Executive Officer and Executive Director Centacare
- Centacare withdrew from the National Disability Insurance Scheme (NDIS) in November 2025
- Archdiocesan Council renamed as Archdiocesan Finance Council (AFC)
- Archdiocesan Ministries and Services Council (AM&SC) renamed Archdiocesan Services Council (ASC)
- Archdiocesan Ministries Council (AMC) established.

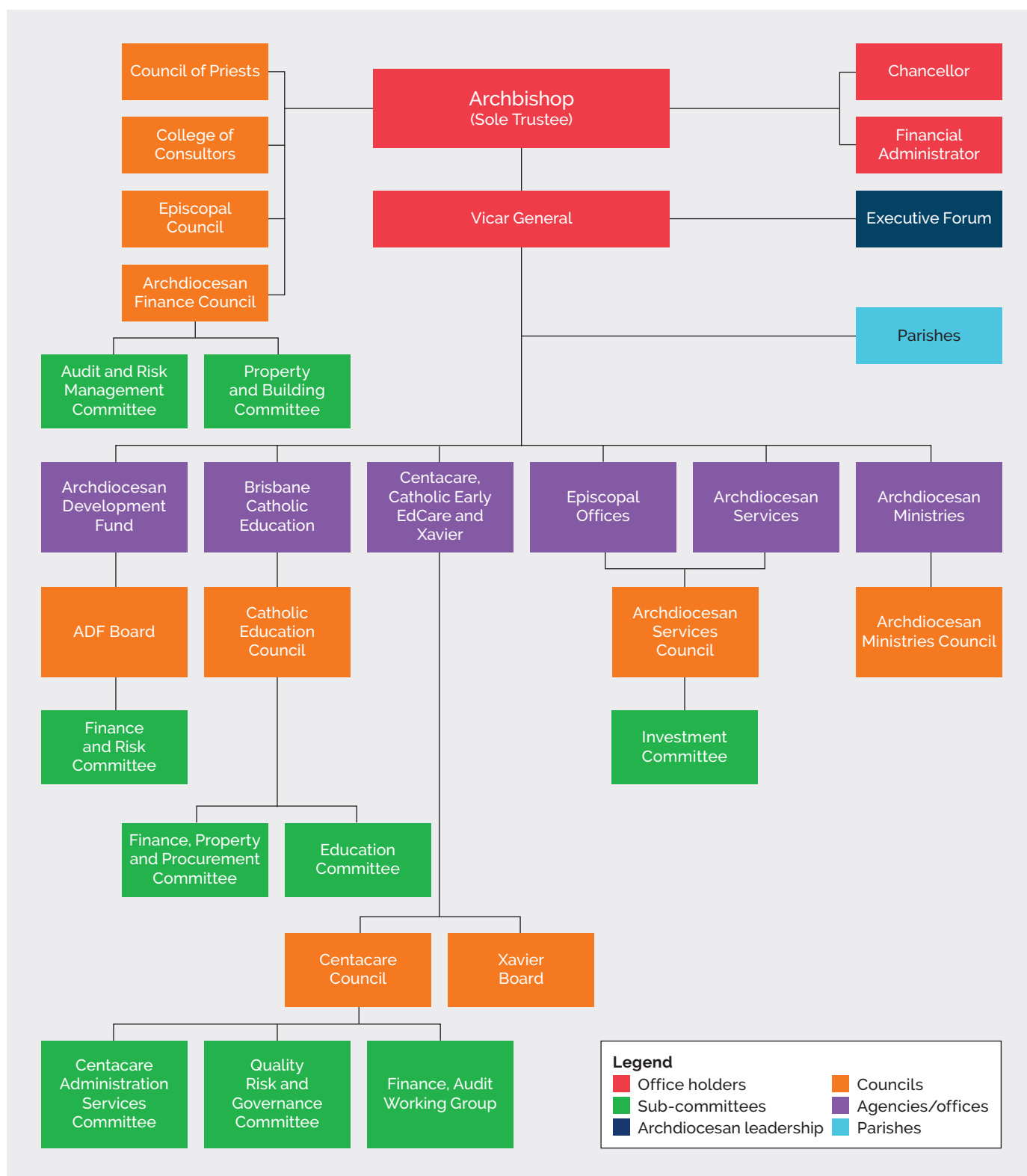


Figure 2: Archdiocese of Brisbane governance framework

Our operations

The Archdiocese contributes to the wellbeing of many communities across south-east Queensland through a diverse range of services and initiatives.

While many people primarily associate the Archdiocese with priests, churches and parish communities, we also live out our faith and mission through important work in areas of education and social services, being present to walk alongside people at critical moments in their lives.

To do this, the Archdiocese employs more than 14,000 Queenslanders. The activities undertaken by our entities are outlined below.

Parishes of the Archdiocese

Our 93 parishes support the religious and spiritual needs of their communities through masses, baptisms, weddings, funerals and other sacraments. They also provide a range of practical supports to members of their communities who are in need.

The Archdiocesan Development Fund

Since 1969, the ADF, as an Agency of the Archdiocese of Brisbane has been financing and fuelling the mission of the Catholic Church.

The ADF is exclusively focused on Catholic entities and have developed a unique understanding of the needs of their customers and stakeholders. This deep understanding allows the ADF to build strong, long-lasting relationships and deliver effective and efficient solutions to meet these needs now and into the future. Structured around a team of experienced relationship managers and operational staff who are freely available to discuss individual customer needs, the ADF ensures each of their customers has a solution tailored to their unique needs.

The ADF is committed to professionalism, confidentiality, security and attention to detail. Supported by experienced vendors such as the Commonwealth Bank of Australia, their clients can operate with peace of mind.

Centacare – including Centacare Administration Services, Catholic Early EdCare and Xavier Children's Network

The Centacare team share a commitment to doing whatever they can to ensure that everyone in their communities is not just cared for, but cared about, in ways that help them live their fullest lives. Across aged care, community and pastoral care, disability care, childcare and family and relationship care, Centacare teams walk alongside people on life's journey, providing the support they need to achieve what is important to them at that moment and into the future.

Since its establishment in the 1950s Centacare's leadership has always been guided by the organisation's Catholic faith. The traditions early leaders established and their faith, continue to guide those working in Centacare today. Referencing the Catholic Social Teachings is one important way people in Centacare continue to understand how our Catholic faith guides our work in communities across South-East Queensland.

Centacare provides early education and care services through Catholic Early EdCare and high intensity support for children with disability through Xavier Children's Support Network. Teams from all across Centacare often come together to provide the holistic support an individual or family needs to thrive. You can see Centacare's full organisation chart in Appendix B. A number of Archdiocesan Services support Centacare's mission.

Brisbane Catholic Education

In the Archdiocese, the Archbishop has responsibility for Catholic education. The Archbishop has delegated authority for the delivery of services, programs and resources in Catholic schools to the Executive Director of Brisbane Catholic Education. The Archbishop and the Executive Director are supported by the Catholic Education Council, the members of which are appointed by the Archbishop. Figure 2 describes this relationship as part of the Archdiocese of Brisbane's governance framework.

Brisbane Catholic Education is a learning community, which includes Archdiocesan and Parish schools and the staff of the Brisbane Catholic Education Office. With 146 schools (refer figure 3), Brisbane Catholic Education provides quality teaching and learning outcomes for Prep to Year 12 students.

Brisbane Catholic Education schools are shaping lives, nurturing individuals and encouraging each student to realise their full potential. Through partnerships with parents, governments and the community, Brisbane Catholic Education schools provide social responsibility, self-discipline and Christian values for all students, and nurture and support the community in their faith journey.

In compliance with the Australian Education Act, Brisbane Catholic Education receives funding from the Federal and State Governments to provide these quality learning outcomes for all students.

You can see the Brisbane Catholic Education's organisation chart in Appendix A.



Figure 3: BCE School logos

Episcopal Office

The Episcopal Office encompasses the offices of the Archbishop and Vicar General as well as the office supporting clergy.

Financial Administrator's Office

The Financial Administrator's Office oversees the financial management and administration of the Archdiocese in accordance with the requirements of Canon Law and the instructions of the Archbishop. In collaboration with the Archbishop, Vicar General and the Archdiocesan Council, the Financial Administrator facilitates the implementation of the Archbishop's financial policies and strategic plans within the Archdiocese whilst ensuring the ongoing financial stability of the Archdiocese.

Archdiocesan Services

Archdiocesan Services provides services and support to parishes and other Archdiocesan agencies in the following areas:

- Finance and Accounting
- Government Relations
- Technology Solutions
- Parish Finance Services
- People and Culture
- Property and Building
- Communication and Engagement
- Workplace Health & Safety
- Governance
- Risk, Assurance and Insurance
- Safeguarding
- Legal
- Archdiocesan Archives
- Nudgee Cemetery and Crematorium

You can see the Archdiocesan Services' organisation chart in Appendix C.

Archdiocesan Ministries (Formerly Evangelisation Brisbane)

The mission of Archdiocesan Ministries is to work with, inspire and empower the Archdiocese of Brisbane to encounter Jesus and live the joy of the Gospel.

Archdiocesan Ministries has a vision to see the Catholic Church become a home for every generation. We envisage a Church that:

- Is a welcoming home for all generations, transcending cultural and societal boundaries to embrace every individual with faith, hope, love and peace.
- Where every person feels safe to come as they are, recognised for their inherent dignity, celebrated in their uniqueness and called into a deep and transformative relationship with God through Christ, guided by the Holy Spirit, and nourished by the sacraments.
- Engages and responds to the diverse voices and experience of others, discerning the movement of the Holy Spirit as we listen.
- That reaches beyond its own walls, working towards healing and reconciliation, especially with First Nations Peoples, caring for creation, advocating for justice and support for the vulnerable.
- Where everyone discovers and lives out their God-given vocation; a Church that looks, sounds, and acts like Jesus.

Archdiocesan Ministries provides services and support to parishes, communities and other Archdiocesan agencies in the following areas:

- Ministry to Children and Families
- Ministry to Youth and Young Adults
- Ministry to Adults
- Strategic Planning and Pastoral Planning
- Ministry of Inclusion through:
 - Multicultural Pastoral Care
 - Refugee Sponsorship
 - Reconciliation with First Nations Peoples
 - Laudato Si' Ecological Spirituality
 - Ecumenical and interfaith dialogue
 - Justice and Peace
 - Liturgy Brisbane
- Vocational Discernment: calling people forward for seminary formation
- Care for Refugees and those seeking asylum through the Romero Centre
- Santa Teresa Spirituality Centre.

Our agencies



ABN 35 020 644 975



744

EMPLOYEES



88

VOLUNTEERS



ABN 24 547 377 893



69

EMPLOYEES
(69 FTEs)



1

VOLUNTEERS



ABN 51 626 296 801



1,597

EMPLOYEES



136

LONG DAY
CARE CENTRES,
KINDERGARTENS
AND OUTSIDE
SCHOOL HOURS
CARE SERVICES

Income

To 30 June 2025, Centacare received income of \$282.4 million of which \$63.9 million was from government funding of aged care and family and relationship services payments. In addition, there was \$199.7 million in fee income from providing community services (NDIS, aged care co-payment and home care services) and childcare. There was other income of \$18.8 million.

\$63.9M in government funding

\$199.7M in fee income

\$18.8M in other income

29,319 children were able to connect, grow and discover at a Catholic Early EdCare long day care centre, kindergarten or outside school hours care service.

6,162 older Queenslanders accessed services to help them to live well in their home and community.

29,793 people affected by domestic and family violence were provided early intervention and crisis response services.

2,135 people with disability accessed services to help them live the life they choose.

5,738 people received home maintenance and modification support to help maintain their independence.

2,940,678 hours of support were provided to older people and people with disability.



ABN 49 991 006 857



11,210
EMPLOYEES
(9,100 FTEs)



6,273
TEACHERS
(5,724 FTEs)



78,015
STUDENTS

146 SCHOOLS

107 PRIMARY SCHOOLS

27 SECONDARY SCHOOLS

12 PREP TO GRADE 12
SCHOOLS

Income

In 2025 Brisbane Catholic Education received an income of \$1,650 million of which \$1,272 million was Government recurrent funding. The main source of this income was Australian and Queensland Government grants for the provision of educational services.

12.1% of students in the Archdiocese attend a Brisbane Catholic Education school

\$1,272M in Australian and Queensland Government grants

59.16% of students identify as Catholic

\$314.6M in school fees and levies

3.65% of students identify as Aboriginal or Torres Strait Islander

\$62.9M in other income

+32 different religious faiths amongst students

Archdiocesan Services Episcopal Offices and Parishes

ABN 25 328 758 007



627
EMPLOYEES



5,040
VOLUNTEERS



93
PARISHES, 17
OF WHICH ARE
RELIGIOUS ORDER
PARISHES



80
PARISH PRIESTS OR
ADMINISTRATORS

Archdiocesan Ministries

ABN 25 328 758 007



59
EMPLOYEES
(35 CASUAL
EMPLOYEES)



52
VOLUNTEERS

Archdiocesan operations

In 2025, Archdiocesan Operations (which includes Archdiocesan Services, Archdiocesan Ministries and the Episcopal Offices) received revenues of \$91.5 million. This was represented by an internal distribution of \$30 million by the ADF, fees, rent and investment income of \$24.1 million, sales of \$6.3 million and other income of \$31.1 million.

The Archdiocese operates within the state of Queensland and has no offices in any other state or country.

203 Number of active Priests in the Archdiocese with faculties

23 Priests in the Overseas Priests Program

18 Retired (Non-active Priests)

684,423 Catholics in the Archdiocese

53,172 attending Sunday Mass per week
(measured through Parish census
in November 2024 which included
other locations)

Providing services across:

- Finance and Accounting
- Government Relations
- Technology Solutions
- People and Culture
- Property and Building
- Communication and Engagement
- Clergy Office
- Workplace Health & Safety
- Governance
- Risk, Assurance and Insurance
- Safeguarding
- Legal
- Archdiocesan Archives
- Nudgee Cemetery and Crematorium

Providing services across:

- Children and families
- Youth and young adults
- Adult formation
- Inclusion
- Communications
- Parish leadership
- Santa Teresa Spirituality Centre
- Vocations Office
- Romero Centre
- Liturgy Brisbane



ABN 25 328 758 007



20

EMPLOYEES



1,024

MEMBERS

Members include archdioceses, parishes, Public Juridic Persons (PJP's) and other Catholic entities and other associates under current ASIC exemptions.

Income

In 2025 the ADF generated \$144.7 million in interest income through the provision of internal church treasury. Loan income of \$72.2 million and investment income of \$72.5 million (net of amortisation).

Our people

The Archdiocese and its agencies uphold clear standards of conduct to ensure a safe and respectful environment. Employees and volunteers who may work directly with children, young people, or vulnerable adults undergo mandatory background checks in accordance with legal requirements.

The Archdiocese's People and Culture department leads the Justice, Equity, Diversity and Inclusion (JEDI) group, which consults regularly with staff on workplace issues related to gender equality, diversity, and inclusion.

Each year, Executive Directors and General Managers certify compliance with Australian employment laws and workplace obligations. Governance councils and external auditors review these certifications to ensure accountability.

Since 2015, the Archdiocese has operated the independent Stopline whistleblower service. This platform enables staff, volunteers, and the broader community to report concerns—including those related to modern slavery—in a safe, confidential, and supported manner.

The Archdiocese has only received one modern slavery matter through the Stopline service which was investigated thoroughly by our procurement team. The allegations raised were by a third-party (not a victim) and were not substantiated. The supplier concerned assisted the procurement team in providing all necessary information in this matter.

Through these measures, we continue to cultivate a culture that promotes ethical conduct and respect for human rights. This internal commitment directly informs how we manage risk and uphold standards across our supply chain.

Our supply chain

In 2025, Brisbane Catholic Education (BCE) engaged approximately 6,800 suppliers (i.e. with an annual spend greater than \$1,000). While most are Australian-based, a significant portion of products are manufactured overseas, introducing modern slavery risks through global supply chains.

Over the course of the last 4 years, BCE has shifted from a highly decentralised procurement model to a more centralised approach. This involves establishing BCE-wide panel arrangements accessible through the procure-to-pay Buying Platform. Standardised tender toolkits, supported by training and a central procurement helpdesk, are also provided for school-based procurement.

This move supports strategic, category-based procurement, enhances oversight, manages supplier risks, and aligns with our commitments under the Modern Slavery Act, the Reconciliation Action Plan (RAP), and the Laudato Si' Action Plan.

The Archdiocese and its agencies procure a wide range of goods and services, including consumables, information and communication technology (ICT) equipment, motor vehicles, building and construction materials, uniforms, cleaning, and office supplies. While centralisation increases oversight, schools, parishes, and services still retain the independence to engage local suppliers, supporting local economies while requiring appropriate due diligence as risks are identified.

Several procurement categories have been identified as high risk for modern slavery, including ICT, construction, cleaning, security, uniforms, waste management, and office supplies. In 2025, the Archdiocese and BCE continue to encourage high-spend suppliers in these categories to join SEDEX and complete the Self-Assessment Questionnaire (SAQ). There are currently 76 Archdiocesan vendors who have joined SEDEX, with 49 completing the self-assessment questionnaire (SAQ).

In 2025, BCE refined its Cleaning Services and Uniform Procurement Toolkits to streamline tendering and increase the pool of pre-qualified suppliers. These updated toolkits were re-launched and supported by one-on-one training and tailored buying guides. The procurement helpdesk played a key role in building capability and supporting ethical sourcing in school-level purchasing.

In 2025, BCE's restructured Procurement and Contracting function is implementing its strategic roadmap through three core streams: Capability and Governance; Sourcing and Partnering; and

Contracting and Compliance. This structure will continue to mature the procurement function and strengthen the management of modern slavery risks through improved governance, sourcing practices and contract oversight.

BCE has commenced onboarding its top 50 suppliers from high-risk categories to the SEDEX platform to improve supply chain visibility and strengthen due diligence.

Additionally, BCE will launch the Supplier Onboarding Project, which aims to improve ethical sourcing and supplier lifecycle management. A new IT platform that will automate onboarding, reduce duplication, and improve compliance with legal requirements, governance and streamlining supplier approvals.

Currently, contract management at the Archdiocese remains decentralised across Archdiocesan offices, schools, parishes, and service centres, with varying levels of oversight and contract duration. While a fully centralised contract management system is not yet in place, steps are being taken to improve governance and transparency through system-wide initiatives and legal reviews.

Complex high-value contracts, such as those for construction, design, consulting, internet, and electricity, are generally managed by senior agency officers and external law firms. In 2025, the Archdiocese through collaboration with its agencies strengthened their vendor engagement and education (refer to Table 5 page 32). Additional initiatives are being investigated to standardise and improve contract management across the Archdiocese.

The following table summarises the Archdiocese vendor analysis for the 2025 financial year.

	2025 Vendor Analysis				
	No. of Vendors	Vendors Reviewed	% of Total Spend	Max. Spend/ Vendor	Min. Spend/ Vendor
Brisbane Catholic Education	6,800	600	84%	\$37,204,753	\$85,703
Archdiocesan Services	780	163	93%	\$10,765,052	\$30,000
Archdiocesan Development Fund	39	39	100%	\$1,157,839	\$109
Centacare - PBI	1,629	259	90%	\$8,103,697	\$20,047
Centacare Administration Services	1,562	144	86%	\$1,799,257	\$20,130
Xavier Childrens' Support Network	314	37	77%	\$77,675	\$10,302
Parishes (*Spend > \$10,000)	297	297	100%	\$573,256	\$10,000
	11,421	1,539			

Table 1: Archdiocesan entities revenue and vendors

The percentage of the total spend analysis increased from 74% in 2023 to 81% in 2024 and 85% in 2025. Analysis of the Archdiocese's financial data shows the major spend categories are:

- Professional services – 18.7%
- Building and construction – 17.4%
- Facility management, and property maintenance – 9.7%

- ICT hardware – 8.9%
- ICT software and network services – 6.1%
- Finance and investment – 5.7%
- Furniture and office supplies – 5.3%

For a detailed breakdown of each agency's spend by category refer to Appendix D.

Supplier Engagement Overview

Sourcing Countries for Tier 1 Suppliers

Overall inherent risk category: ● High ● Medium

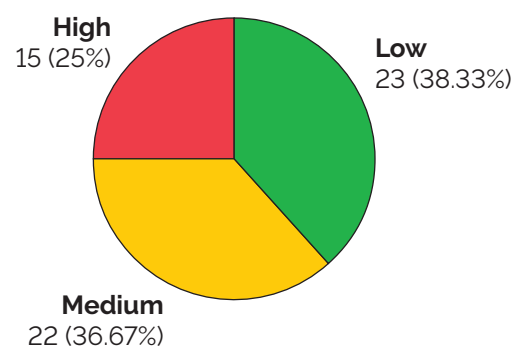


- 1,341** Total Suppliers
- 485** Suppliers in High Risk procurement categories
- 238** ACAN Supplier Surveys completed
 - 91** ACAN Supplier Surveys completed in 2025
- 66** Suppliers identified for Sedex Onboarding
- 658** Supplier Communication
 - 21** Suppliers completing e-learning
- 10** Audits in 2025
- 60** Audits Findings in 2025
- 76** Suppliers on Sedex
- 49** SAQs Completed

Supplier Screening – ACAN Collated

- 529** Enhanced 3rd Party Supplier Screening
- 25** 3rd Party Supplier Screening – High and Medium Risk

Sedex SAQ Risk Category



Reporting Criteria 3:

Modern slavery risks in operations and supply chains

Our operations risks

The Archdiocese continued its development of strategies and processes to ensure continuous improvement with its obligations under the Modern Slavery Act 2018 and Pope Leo XIV's call to take action to confront and end human trafficking.

"Urgent call to confront and bring an end to this grave crime against humanity."

(Source: Vatican News 6 February 2026)

The implementation of a new onboarding process by our People and Culture offices assist the Archdiocese and its agencies recruitment processes to ensure that all employees are engaged in a fair and equitable manner. This has been a key driver in providing us with confidence that the residual risk of modern slavery in our staffing is low. Archdiocesan offices and agencies address human rights issues in our operations under our Codes of Conduct, Equal Opportunity Policies, Inclusion Policies and a suite of other policies and programs.

Other potential human rights issues that could arise in our operations include equality, fair pay, discrimination and safety. While these are not necessarily indicators of modern slavery risk, the Archdiocese acknowledges they are potential labour rights issues which could impact our reputation. To ensure these are identified and reported, the Archdiocese enhanced its Whistleblower Policy and Procedures in 2024, which has seen an increase in reporting across a number of human resource related issues.

The key modern slavery risks associated with the Archdiocese's tier one suppliers related to the following Australian workplace laws:

- health and safety,
- excessive working hours,
- unpaid work,
- below legal minimum wages,
- forced labour,
- child labour, and
- limited or no freedom of association.

Country	Risk	Example of product/service sourced
Australia	Migrant labour exploitation	Cleaning contractors, construction contractors
China	Freedom of association, excessive overtime, forced labour	Electronics, general merchandise, office supplies
Indonesia	Forced labour, bonded labour, migrant labour exploitation	General merchandise
Malaysia	Forced labour, bonded labour, migrant labour exploitation	ICT products, office supplies, electronics, general merchandise
Thailand	Migrant labour exploitation	General merchandise
Vietnam	Excessive overtime	General merchandise, office supplies, electronics

Table 2: Source country risks

There are three factors which, if they exist in our tier one supplier's businesses, can increase the risk of modern slavery where:

- i. Archdiocesan suppliers outsource activities, meaning we do not have a clear line of sight of who is supplying the end product. This also includes where our suppliers use sub-contractors.
- ii. The risk of unfair working conditions when people are employed through third-party labour hire companies for unskilled and semi-skilled labour or where our suppliers utilise sub-contractors to provide cleaning services, construction labour, or groundskeeping services at lower than award levels.
- iii. Countries are associated with increased risks of modern slavery. In table 2 we have identified some of the countries and risks relevant to our supply chain.

Primarily China, Malaysia and Australia are the greatest risks in the Archdiocese's supply chain through migrant labour exploitation. In Australia, this will become a greater risk leading up to the 2032 Olympic Games as labour shortages in the construction industry will lead to the sourcing of labour from overseas jurisdictions. Additional risk mitigation strategies will be implemented to ensure the Archdiocese and its suppliers are not exposed to further risks in this sector.

The offices and agencies of the Archdiocese understand that holding direct relationships with tier one suppliers will assist in managing these risks and will be focusing on developing these relationships further in the coming years with our larger suppliers.

The Archdiocese does acknowledge there may also be heightened risk of modern slavery among tier two suppliers and those further down the supply chain, where our offices and agencies do not have direct relationships and therefore no visibility of employment practices. By subscribing to third-party organisations such as Sedex, we are able to leverage off a network of high value overseas and domestic suppliers, who are required to complete various self-assessment questionnaires and third-party audits as required.

Where a modern slavery risk is identified, further due diligence and this collaboration with the vendor is undertaken to mitigate any ongoing risks and this will be assisted in the expanded use of the Sedex platform in 2024 and this was extended in 2025, with direct requests to vendors with an annual spend greater than \$500k. The Archdiocese seeks to maintain relationships with vendors where possible in order to further educate and raise awareness of modern slavery within our supply chain.

Archdiocese of Brisbane Consolidated Percentage of Vendor Assessed Spend

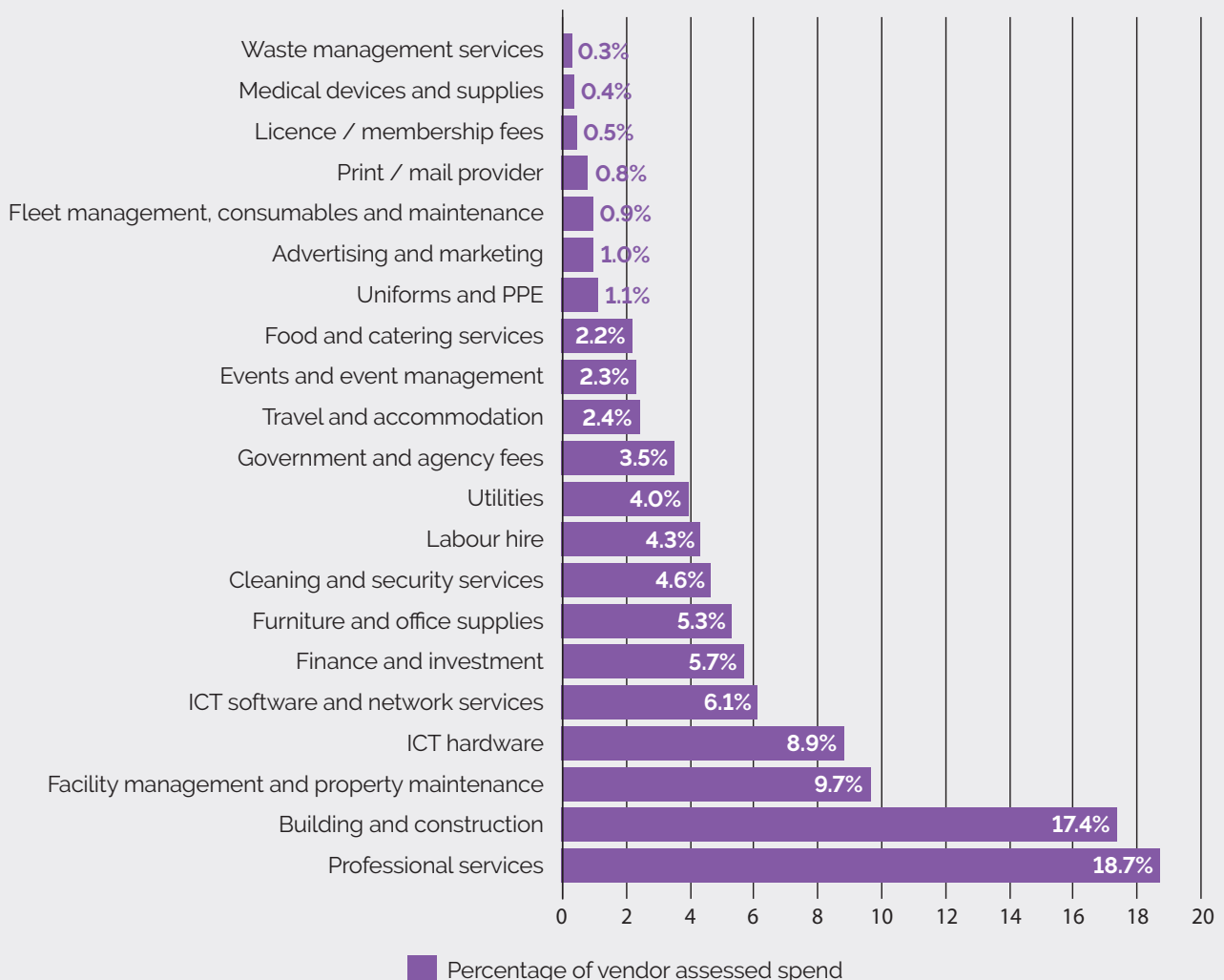


Figure 4: 2025 Consolidated spend profile of the Archdiocese of Brisbane

As we expand our analysis of consolidated Archdiocesan spend, we continue to identify that building and construction, information and communications technology, facilities management, furniture and office supplies, and cleaning and security services remain key risks within the Archdiocese's supply chain. In 2024 there was a marked increase in the overall spend of building and construction and facilities management as more detailed analysis of our vendor network was undertaken. There were additional reporting enhancements implemented across these categories in 2025. Other sectors remained relatively constant.

For a detailed breakdown of each entity's spend by category refer to Appendix F.

Supply chain risks

The areas of risk identified above have been assessed against percentage of annual spend and respective modern slavery potential risk exposure. The category risk taxonomy has been specifically developed for ACAN-based entities based on analysis of participating entity supplier datasets. It includes 12 high level procurement categories identified across various sectors involved in the ACAN network (education, aged care, health care, social services, finance and investment, and Catholic dioceses). The information included in

Table 3 has assisted the Archdiocese of Brisbane to assess potential risk so it can prioritise engagement activities with suppliers. Significant progress has been undertaken in cleaning and security services. In 2025 analysis commenced on the building and construction sector. This will be extended in 2026-27 and will also include a review of the facilities management and property maintenance sector which together account for 28.4% of our consolidated annual expenditure (excluding salaries and wages).

ACAN Category	Count of 2025 High Risk Vendors	Value High Risk Vendors 2025
Building and construction	81	\$87,765,377
ICT hardware	47	\$48,725,776
Facility management and property maintenance	275	\$29,919,488
Finance and investment	29	\$28,631,979
Furniture and office supplies	83	\$26,727,687
Cleaning and security services	92	\$23,440,747
Labour hire	25	\$21,910,785
Food and catering services	40	\$11,180,028
Events and event management	72	\$11,601,489
Uniforms and PPE	21	\$5,509,961
Medical devices and supplies	25	\$1,843,317
Waste management services	5	\$1,486,719
Grand Total	795	\$313,507,717

Table 3: High Risk Vendor Analysis

The Archdiocese has identified 795 vendors across 12 high risk industry sectors for further analysis over the next three years. Our action plan for 2025 has targeted several of these industry sectors for review with the others to be added during the review cycle. These 795 vendors account for more than 62% of the Archdiocese's 2025 annual assessed spend. Where appropriate a number of these vendors were asked to join Sedex to ensure ongoing review/assessment of their modern slavery obligations.

Category	Spend description	Risk	% of expenditure
Building and construction	Building materials (e.g. concrete, steel, timber, plaster products, glass, plastics, quarried stone etc) sub-contracting and labour hire services, demolition, painting and landscaping.	HIGH	17.4
Facilities management and property maintenance	Hard and soft services including minor repairs, plumbing and septic, utilities management, building operations, HVAC, landscaping and yard work, removalists, cleaning and janitorial, security and patrols.	HIGH	9.7
ICT hardware	According to the 2018 Global Slavery Index (GSI), electronics are the highest risk product for modern slavery in supply chains. The report also highlights that the most at-risk electronics imported to Australia are from China and Malaysia. Forms of modern slavery identified by the GSI and other reports as being present in the electronics sector include passport retention or doctoring of identity documents, restriction of freedom of movement, poor living conditions, underpayment, fines and illegal salary deductions, excessive working hours and unpaid overtime. Software and application development, support services, call centres (offshore).	HIGH	8.9
Finance and investment	Investment funds, private equity and hedge funds, banks, financial services providers, insurers, credit and bond rating agencies.	HIGH	5.7

Category	Spend description	Risk	% of expenditure
Furniture and office supplies	General office suppliers, stationery, paper products, small office machines, (not computers or peripherals), labels, ink, toner, furniture (chairs, tables, workstations, filing cabinets, shelves, racks etc), workplace suppliers (cleaning, first aid, bathroom etc), packaging, boxes etc.	HIGH	5.3
Cleaning services	Sub-contracting and labour hire services, chemicals and cleaning products, security equipment (radios, torches, pouches, bags etc) PPE, uniforms and footwear.	HIGH	4.6
Labour hire	Labour hire organisations, specialising in the provision of services to our clients in delivering social services.	HIGH	4.3
Uniforms and PPE	Uniforms (workwear, school wear, sportswear), footwear and PPE (e.g. gloves, face masks or respirators, glasses / goggles, earmuffs, safety workwear etc).	HIGH	1.1
Other	Categories < 3% requiring further analysis.	MEDIUM/ HIGH	10.7
ICT software and network services	Software and application development, support services, call centres (off-shore).	MEDIUM	6.1
Utilities	Electricity (including solar farms), gas, water and wastewater, telecommunications (linked to resources sector risk).	MEDIUM	4.0
Professional services	Other.	LOW	18.7
Government and agency fees	Government expenses and external catholic organisations.	LOW	3.5
			100.0

Table 4: Risk Taxonomy for the Archdiocese of Brisbane

Reporting Criteria 4:

Actions taken to assess and address risk

Throughout the 2025 reporting period, the Archdiocese undertook an extensive review of its decentralised supply chain to better understand and address modern slavery risks across operations. This work highlighted the inherent complexity of a federated procurement environment and reinforced the importance of consistent practices, robust governance, and cross-agency coordination.

Our active membership in the Australian Catholic Anti-Slavery Network (ACAN), including participation in monthly webinars, has continued to provide valuable support and guidance throughout the year. In parallel, the rollout of modern slavery e-learning modules aimed to strengthen staff capability to identify and respond to risks.

In 2025 there has been a renewed focus on leadership coordination and oversight, with senior executives committing to complete the training and encourage uptake among staff with procurement responsibilities.

While 2024 marked a shift toward implementation and capability building, in 2025 there was a need to rebuild the structural requirements of the procurement function, and reflects our strategic commitment to embedding ethical procurement practices across all operations.

Actions taken during reporting period

In 2025, the Archdiocese through collaboration with Brisbane Catholic Education and Centacare improved governance coordination, meaningful supplier engagement through both ACAN and Sedex, and the operationalisation of tools and frameworks developed in prior years.

Governance and Strategic Alignment

1. The Laudato Si' and Modern Slavery Reference Groups now operate as an effective, efficient and a unified governance body between the Archdiocese and BCE, creating a single point of accountability for ethical procurement and sustainability actions.
2. The Archdiocese and BCE Modern Slavery Liaison Officers (MLSOs) have demonstrated strong and effective coordination, supporting a collaborative approach to modern slavery risk management. Through this partnership, and regular engagement with ACAN and its Program Managers and Executives, valuable knowledge sharing has been enabled across Archdiocesan agencies, which continue to benefit from this centralised coordination.

Category Management and Contract Lifecycle Management Reform

1. BCE has expanded its Category Management Framework beyond cleaning and waste management to include uniforms, office supplies, ICT and furniture.
2. In 2025, BCE Procurement was restructured to strengthen capability and governance, centralise sourcing, and enhance compliance and contract management. The new Procurement and Contracting team have developed a strategic roadmap focused on increasing maturity and mitigating modern slavery risk.
3. In 2025, BCE continued to expand centralised contract management, applying standard terms and conditions across a broader range of supplier arrangements, including embedded modern slavery clauses for higher-risk service categories (such as cleaning services). Contract lifecycle events, including the creation, renewal, and replacement of contracts, removed unmanaged renewals and enabled refreshed supplier expectations. Strengthened contract oversight and structured supplier engagement improved transparency and traceability across the supply chain, enhanced supplier accountability, and reduced BCE's exposure to ethical and operational risk. This demonstrates the value of a category-based approach to managing modern slavery risk through effective contract and supplier lifecycle management processes.

Supplier Engagement and Due Diligence

1. BCE has embedded its revised Supplier Code of Conduct. The Code of Conduct reflects BCE's expectations in human rights, labour standards, environmental responsibility and safeguarding and is incorporated in RFQ and onboarding documentation and published on the BCE external website.
2. BCE has strengthened supplier pre-qualification requirements for higher-risk categories. Building on supplier engagement undertaken in previous reporting periods, BCE requires suppliers selected in higher-risk categories – including cleaning, groundskeeping, waste and uniforms to hold and maintain an active SEDEX membership, and to the SEDEX Self-Assessment Questionnaire (SAQ) as part of tender pre-qualification.

3. Following the prioritisation of high risk suppliers with annual spend above \$250,000 in 2024, enhanced due diligence reviews are now embedded as business as usual practice and continue in 2025, with a focus on higher risk procurement categories and informed by internal assessments and guidance from the Australian Catholic Anti Slavery Network (ACAN).

Technology Enablement

1. The Supplier Onboarding Project will deliver a technical solution to strengthen vendor management controls, including centralised supplier creation approval within the Procurement and Contracting Team. The solution enables automated compliance checks and real time reporting, providing BCE with greater transparency of supplier compliance. Delivery of the technical solution is planned to go live at the end of May 2026, with supplier verification to occur in the second half of 2026.
2. Draft RFQ and RFP templates were updated in 2024 to include mandatory modern slavery risk screening questions and were piloted during that year. In 2025, these requirements are being fully embedded as part of BCE's standardised RFQ and RFP templates.

Education and Awareness

1. The Archdiocese and BCE have adopted some of ACAN's e-learning training modules. These are available to employees through the Archdiocese's Arch e-Learns (LMS) and the BCE Learning Management System (LMS).

The training incorporates selected modules developed by the Australian Catholic Anti Slavery Network (ACAN) and includes content on Modern Slavery 101, business relevance, and grievance and remedy mechanisms.

2. BCE expanded mandatory modern slavery training in response to participation levels observed in earlier reporting periods.

Mandatory training was introduced for senior leaders and staff with purchasing responsibilities and is delivered through the LMS as part of BCE's ongoing capability and governance uplift.

Parish and Community Engagement

1. The Parish Toolkit was formally launched across all 93 parishes, accompanied by an internal communications campaign and social media messaging to improve visibility of ethical procurement responsibilities at the local level. The Toolkit will be reviewed and updated in 2026.

Modern slavery action plan and road map

In 2024, BCE launched a three-year Modern Slavery Action Plan (MSAP), aligned with Laudato Si' and ACAN's 2024 program. The MSAP centralises high- risk procurement oversight, embeds risk-based supplier prequalification, and delivers targeted training and engagement initiatives. The MSAP will be reviewed and updated in late 2026.

The Archdiocese continues to build a structured and scalable approach to managing modern slavery risk across its supply chains. Since first engaging with Sedex, one of the world's largest ethical audit platforms, and the Archdiocese has progressively increased its supplier transparency (Refer data in Criteria 5, Table 5)

As part of this evolution, the Archdiocese and BCE established mandatory RFQ and RFP pre-qualification using Sedex's Self-Assessment Questionnaire (SAQ) for suppliers operating in high- risk categories. This initiative proved successful and has continued to be expanded throughout 2025, progressively strengthening upstream risk screening at the point of supplier engagement. In 2024, BCE launched its annual Modern Slavery Action Plan (MSAP), aligned with both the Laudato Si' Action Plan (LSAP) and ACAN's 2024 program of work. The MSAP sets out a clear roadmap for:

- Centralising oversight of high-risk procurement categories,
- Embedding risk-based supplier prequalification, and
- Delivering targeted staff training and supplier engagement activities.

These actions represent a shift from foundational development to full implementation, laying the groundwork for sustained impact, continuous improvement, and measurable outcomes on an ongoing basis.

2025 Case Study: Category-based risk management

In 2025, BCE continued to strengthen modern slavery governance through the operation of the newly established Procurement and Contracting function and a sustained focus on category based contract management. Consistent with this approach, a review of cleaning contracts conducted in December 2025 confirmed that 82% of cleaning arrangements were operating under BCE's standard terms, including embedded modern slavery clauses. This reflects continuous improvement in contract governance and the progressive transition away from legacy supplier terms as contracts are renewed or replaced.

Looking ahead, BCE intends to further mature its approach in 2026 through the establishment of a cleaning services supplier panel, which will support enhanced supplier oversight, more consistent application of modern slavery requirements, and strengthened risk based supplier management.

BCE 2024 Modern Slavery Action Plan (MSAP)

Action category	Actions for implementation	Status
Business and management systems	Establish a 3-year Brisbane Catholic Education Modern Slavery Action Plan (MSAP), that discerns and is connected to the Archdiocese of Brisbane Laudato Si' Action Plan (LSAP) and aligns to the ACAN 2024 program of work.	Established in 2024 and is ongoing.
	The Brisbane Catholic Education Modern Slavery Action Plan (MSAP) and funding commitment approved by the Executive Director.	Established in 2024 and is ongoing.
Risk management	Develop RFQ and RFP templates with strong mandatory pre-qualification criteria, in particular, criteria that reduces modern slavery risk exposure and highlights potential modern slavery within the supplier's supply chain.	RFQ and RFP templates enhanced in 2024 and is now mandated from 2025 for high-risk categories, requiring suppliers to complete self assessment questionnaires (SAQs) and, where relevant, be onboarded into the Sedex platform.
	Establish Sedex as the tool of choice in building modern slavery knowledge, insight and capability, across the Brisbane Catholic Education Modern Slavery Reference Group.	SEDEX is the tool of choice that strengthens early identification of modern slavery risks prior to contract award and execution.

Action category	Actions for implementation	Status
Procurement and supply chain	Establish a supplier on-boarding framework and process that enables the supplier management strategy, driving stronger pre-qualification and compliance for suppliers engaged by Brisbane Catholic Education.	The Supplier Onboarding project is in the final stages of design and development for the technical solution to enable verification. The Project expects suppliers to commence the verification process from June 2026. The scope includes supporting current suppliers to become verified and a procedure for offboarding suppliers that do not meet BCE's minimum criteria. Additionally, the project involves strengthened controls for vendor management and ongoing maturity of managing the vendor lifecycle centrally in Procurement and Contracts.
	Ensure cleaning, uniforms, waste management, print, ICT, and furniture and office supplies contracts which are managed by Brisbane Catholic Education Procurement contain appropriate modern slavery clauses.	BCE has developed bespoke contract templates for high-risk categories to ensure more robust modern slavery clauses are embedded. Following a compound annual growth rate of 60% in contracts under management from 2022 to 2024, BCE has continued to increase strategic oversight of procurement through centralised contract management. BCE continue to update its standard templates to include categories such as Construction (updated 2025) and ICT which will be updated in 2026, with a focus on applying BCE terms and embedding modern slavery clauses.
	Develop a supplier engagement strategy that includes a refreshed Supplier Code of Conduct.	The refreshed Supplier Code of Conduct was published on BCE's external website and systematically embedded into onboarding, tender, and RFQ documentation, especially for high-risk suppliers. Part of the category based approach is a Supplier Engagement Strategy, which commenced in Q4 2024 with BCE's Top 20 suppliers (by spend) and has been expanded in 2025 to include capability building activities, FAQs, and guidance for suppliers in navigating BCE's ethical procurement requirements.
	Ensure all contracts contain appropriate modern slavery clauses.	That said, modern slavery clauses have been included in bespoke contracts such as cleaning, uniforms, canteen) due to their classification as high-risk industries for modern slavery.

Action category	Actions for implementation	Status
Human resources and recruitment	Develop a modern slavery communications strategy.	Commenced early 2024 and is ongoing.
	Implement a phased training program for staff with purchasing (buying and approving) responsibilities.	Commenced Q2 2024 and is ongoing.
	Promote awareness of modern slavery internally. Archdiocesan and BCE intranet platforms, ensuring accessibility and visibility to all staff members.	Continuing for 2026.
Customers and stakeholders	Engage key stakeholders on our modern slavery expectations.	Commenced in 2021 and is ongoing.
	Establishing RFQ / RFP mandatory pre-qualification to require suppliers to have active Sedex memberships, complete the Self-Assessment Questionnaire (SAQ) up to 100% and connect to Brisbane Catholic Education as a supplier on Sedex.	RFQ and RFP templates enhanced in 2024 and mandated from 2025 for high-risk categories, requiring suppliers to have an active SEDEX membership and have completed the self-assessment questionnaires (SAQs) to 100% and, maintain their SEDEX membership for the duration of the contract with BCE.
	Refresh the Archdiocesan and Brisbane Catholic Education Supplier Code of Conduct and communicate with high-risk suppliers via BCE's external website, through RFQ/RFP processes and through on-boarding suppliers to the BCE Buying Platform (especially for catalogue- based suppliers).	The refreshed Supplier Code of Conduct was published on BCE's external website and systematically embedded into onboarding, tender, and RFQ documentation – especially for high-risk suppliers.

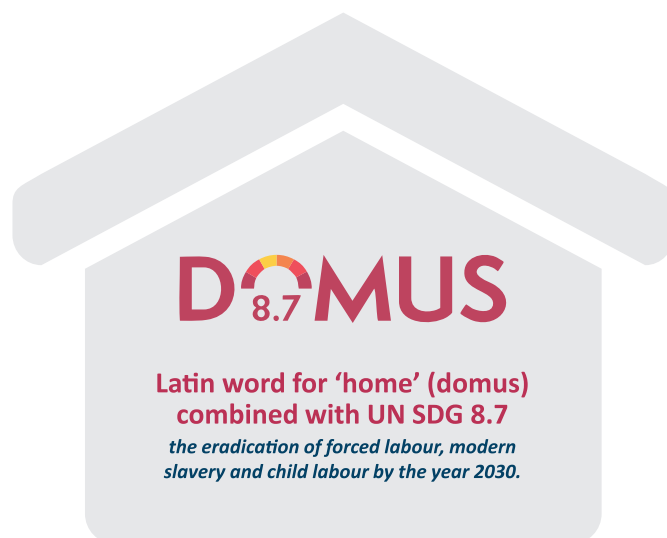
Table 5: BCE's Modern Slavery action plan

Domus 8.7

The Archdiocese of Brisbane is a founding member of Domus 8.7. Domus 8.7 was established as an agency of the Catholic Archdiocese of Sydney in 2020 as a key element of the ACAN Modern Slavery Risk Management Program. This collaborative approach to remediation is aligned with the Modern Slavery Act and Catholic Social Teaching which are centred on the needs, wellbeing and empowerment of people impacted.

Domus 8.7 provides the Archdiocese of Brisbane with:

- resources that enable us to listen to workers (grievance channel)
- a 24/7 careline for workers on our sites, staffed by professional counsellors
- direct support to people impacted by modern slavery
- guidance and technical assistance to prevent, identify and remediate modern slavery
- a documented process to assess if an organisation has caused, contributed or is directly linked to modern slavery and modern slavery indicators



Domus 8.7 empowers people impacted by modern slavery to have choice and control over what forms of remediation are meaningful to them and to engage safely with business/supply chain actors. Supports may include:

- modern slavery indicator assessment
- needs assessment, case coordination, response and remediation planning
- referrals to community, social services, unions
- transport, accommodation, financial and food support
- legal support, referrals, accompaniment and advocacy
- job training, retraining and redeployment
- accompaniment and advocacy to engage with government and law enforcement agencies
- opportunities to contribute lived expertise to improve modern slavery responses.

Why a remedy pathway is needed

A remedy pathway provides several direct and indirect benefits to businesses:

- Enhances modern slavery risk management programs within operations and supply chain
- Provides assessment, support and guidance in relation to modern slavery concerns
- Develops internal capability to manage risk and engage staff
- Establishes a documented pathway to manage (potentially) complex humanitarian issues
- Addresses a key mandatory reporting requirement of the Modern Slavery Act 2018
- Boosts credibility and reputation as a responsible business
- Enhances standing with regulators, shareholders, customers and community groups.

Integrating remedy into systems and processes demonstrates an ongoing commitment to protecting the human rights of people in the operations and supply chains of our operations.

Domus 8.7 is an agency of the Catholic Archdiocese of Sydney. Domus 8.7 staff can help workers, businesses or community members to obtain support, advice and guidance on how to respond to suspected or actual situations of modern slavery.

Contact Domus 8.7 on 02 9307 8464, email info@acan.org.au or send a message to <https://www.acan.org.au>

In cases where there is an immediate threat to life and safety, please dial 000.

Whistleblower hotline

The Archdiocese believes that everyone is entitled to work in an ethical workplace free of harassment, bullying, corruption and illegal activities. The Stoplevel Whistleblower Hotline is provided for any employee, supplier or customer to anonymously report suspected or actual wrongdoing in our organisation, including that related to modern slavery.



Archbishop Mark Coleridge Emeritus presents the Stoplevel and Whistleblower Policy

<https://www.youtube.com/watch?v=W7oXT83XP-s>

Reporting Criteria 5:

Effectiveness assessment

In 2024, ACAN shifted away from the Gap Analysis previously reported towards a focus on the maturity of our modern slavery risk management approach. As we present the fifth modern slavery statement, it's essential to recognise the need for a reset to aim for continuous improvement as required under the Modern Slavery Act 2018.

This transition underscores the importance of assessing our approach's maturity to drive the impact against modern slavery. The maturity scorecard is designed to provide a comprehensive view of our efforts across different key areas of operation, presented as pillars.

Continuous improvement

Collaboration is at the heart of accelerating progress. This also includes opportunities to comparatively measure social, environmental and governance (business ethics) risks and actions with peers in our network.

In its foundational stages, the Archdiocese of Brisbane used an internally devised ACAN framework to measure progress. This bespoke approach reflected the unique priorities, constraints, and practices across Catholic organisations.

In 2025, the ACAN Program adopted a globally recognised risk measurement system through SEDEX. This aligns reporting entities with a

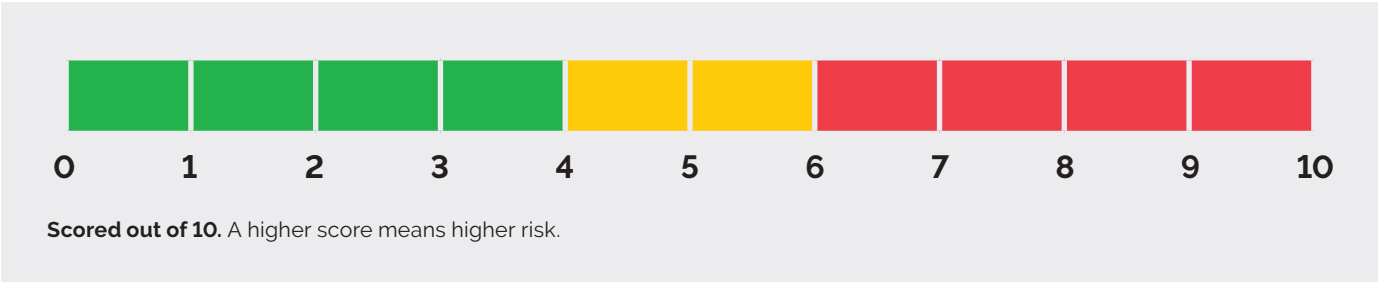
methodology that combines global data about risks in different countries and industries with site-specific information from the SEDEX platform. SEDEX regularly updates the methodology to ensure it is aligned with new and emerging risks. Therefore, completion of the SEDEX SAQ completed by the Archdiocese of Brisbane is a substantial measure of continuous improvement year on year. Below is an explanation of how scoring is calculated using the SEDEX SAQ and the Archdiocese's 2025 risk scores and management controls that will serve as our benchmark for continuous improvement.

Explanation of Scoring

Combined Risk Score 0/10 – calculated from inherent risk and site characteristics, adjusted for management controls and audit results. The score is broken down by pillar and highlights strengths and opportunities to focus our efforts on key areas that drive ethical and sustainable practices.

Inherent Risk Score 0/10 – predicts potential risks based on a country/region, and sector. Spanning all four pillars, this score is broken down by topics. It can be used as a baseline to identify and prioritise areas for improvement in operations. This score shows the natural risks of doing business in a specific country or sector. It does not include any details about individual sites.

Risk scoring scale



Labour Standards Pillar – assesses location and industry factors that could increase labour risks, such as vulnerable worker populations or high rates of workplace violations.

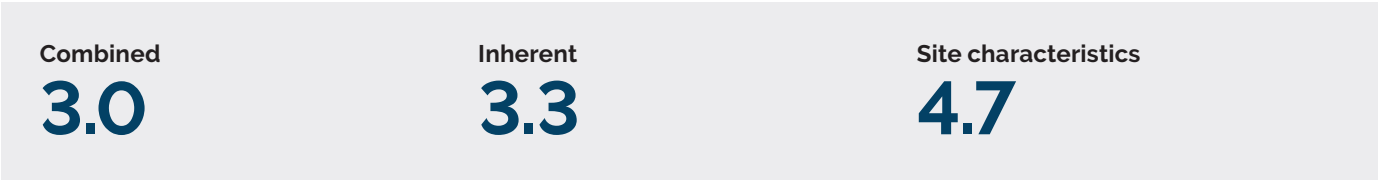
Health and Safety Pillar – considers regional and industry-specific health and safety risks, including local regulations and industry accident rates.

Business Ethics Pillar – assesses industry and location risks related to unethical practices, such as high corruption levels or weak regulatory oversight.

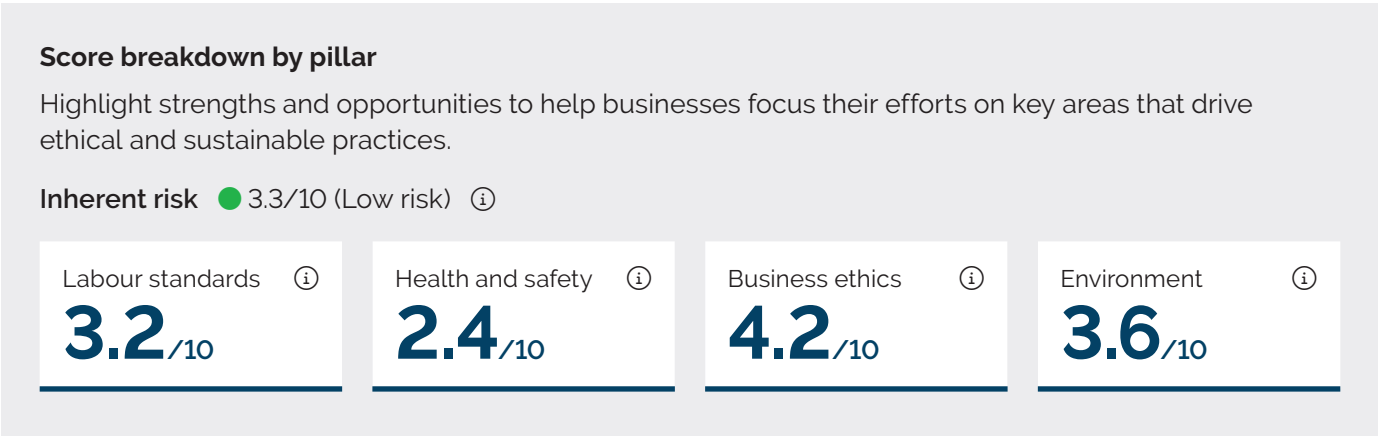
Environment Pillar – examines the environmental impact of the site's industry and location, such as pollution levels or resource use that may create regulatory or compliance risks.

Risk scoring summary

Scores based on the site's basic information, SAQ answers and latest audit.



The Archdiocese of Brisbane received a combined risk score of 3/10 (Low Risk) and an inherent risk rating of 3.3 (Low Risk). The breakdown by pillar of this score.



Site Characteristics Risk Score 0/10

Highlights potential risks based on our suppliers' SAQ responses in the Labour Standards and Health and Safety pillars. This score can be used to assess and support the implementation of policies and processes that mitigate workplace risks within our supply chain

Labour standards – reflects labour-related risks like employment practices, workers rights and wages based on SAQ responses. High-risk activities in this area can raise the score.

Health and Safety – based on SAQ responses to questions about site-specific health and safety factors, such as equipment usage, handling of chemicals or accident risks.

Management Controls Score 0-5

This score measures how well policies or processes are in place to reduce the risks from the site characteristics. It is also based on answers in the SAQ. A Poor score of 0-0.9 indicates that there are few or no controls in place. An advanced score of 4-5 indicates that there are exemplary controls that exceed compliance and drive innovation.

Labour standards – evaluates policies and processes to ensure fair labour standards and worker protections are effectively managed.

Health and Safety – reviews the adequacy of safety protocols, emergency preparedness and training efforts to manage health and safety risks on site.

Business Ethics – evaluates controls against unethical practices such as anti-bribery policies, compliance with legal standards and transparent operations.

Management controls 4.1/5 (Advanced)

Measures suppliers' risk management (0-5, with 5 as best) to assess effectiveness and target improvements.

Labour standards ⓘ

4.2_{/5}

Health and safety ⓘ

3.9_{/5}

Business ethics ⓘ

4.5_{/5}

Site title	Points available	Points achieved	% of points achieved	Management Controls Score
Profile	1	1	100%	5.0 (Advanced)
Management systems	31	30	96.8%	4.9 (Advanced)
Freely chosen employment	15	10	66.7%	3.4 (Good)
Freedom of association	7	6	85.7%	4.3 (Advanced)
Health and Safety	53	44	83%	4.2 (Advanced)
Living accommodation	82	62	75.6%	3.8 (Good)
Working hours	6	6	100%	5.0 (Advanced)
Discrimination	41	34	82.9%	4.2 (Advanced)
Discipline and grievance	28	23	82.1%	4.1 (Advanced)
Communities and human rights	12	7	58.3%	2.9 (Moderate)
Business ethics	10	9	90%	4.5 (Advanced)

Baseline Data template

The ACAN baseline data table provides a comparative measure of supplier engagement and program activities to measure progress and inform future action planning.

Activity	2024 Catholic Archdiocese of Brisbane	2025 Catholic Archdiocese of Brisbane
Hours spent on modern slavery activities	867	830
Individual staff completed e-learning	1,580	1,021
E-learning modules completed	1,245	2,765
Total number of suppliers	11,347	11,421
Number of suppliers with visible contact information and ABN	1,152	1,341
Number of suppliers across high-risk categories	485	498
Number of ACAN Supplier Surveys completed	176	238
Supplier staff attending capacity building webinars	58	21
Supplier Communications	New	658
Suppliers completing e-Learning	New	21
Supplier Audits	New	10
Invited to join Sedex	56	66
Joined Sedex	49	76
Sedex SAQ completed	66	49
Social audits	1	10
Corrective actions	0	0
Enhanced third party Supplier screening	New	529
Contacts made via worker voice / grievance mechanism	71	54
Referrals for advice and assistance	1	0
Individuals identified or referred for modern slavery assessment	0	0
Individuals with modern slavery cases remediated	0	0

Table 5: Baseline Measure of the Archdiocese's Effectiveness Assessment

Areas identified for improvement in 2026 include:

- Operations – Further embedding modern slavery in our procurement processes
- Improving the effectiveness of our actions

Reporting Criteria 6:

Process of consultation with entities owned or controlled

The Modern Slavery and Laudato Si' Reference Group oversees the implementation of BCE's Modern Slavery Action Plan as well as the deliverables under the Laudato Si' Action Plan.

In 2024, the Modern Slavery and Laudato Si' Reference Group coordinated by Brisbane Catholic Education was expanded to include Archdiocesan representation with both the Director Risk and Compliance and the Governance Risk and Compliance Officer (who are both Modern Slavery Liaison Officer's (MSLO's) for the Archdiocese).

Archdiocesan representatives liaise with all agencies and offices in gathering information required in addressing the legislative criteria under the Modern Slavery Act (C'wth) 2018.

The consultation process was expanded through 2025 following significant changes within agencies which is highlighted under Criteria 1 and 2.

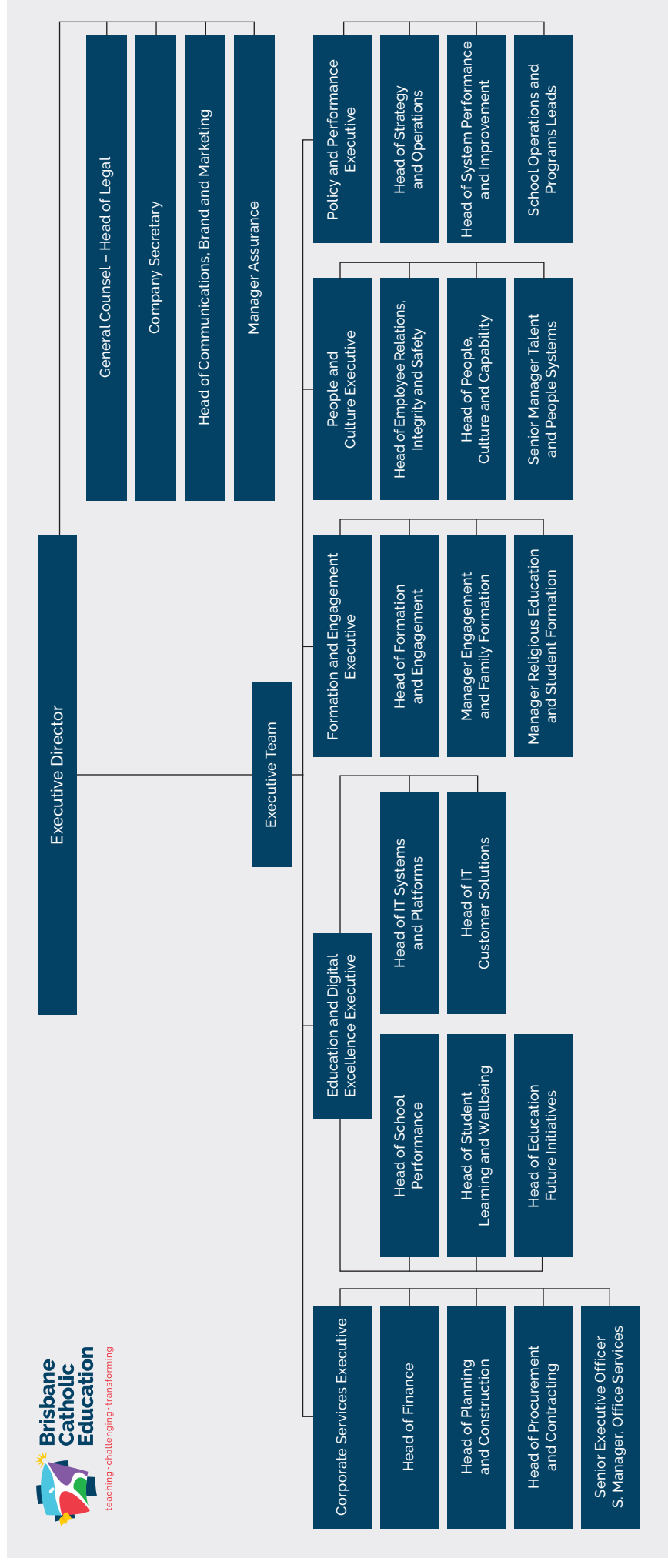
The Archdiocesan Audit and Risk Management Committee maintains oversight of the human rights and modern slavery risks through the Archdiocesan Risk Management Framework.

It is proposed to expand the membership of the Modern Slavery and Laudato Si' Reference Group in 2026 to include representation from Centacare and Catholic Early EdCare. This will enhance the continuous improvement of our Modern Slavery Framework and greater collaboration across Catholic entities.

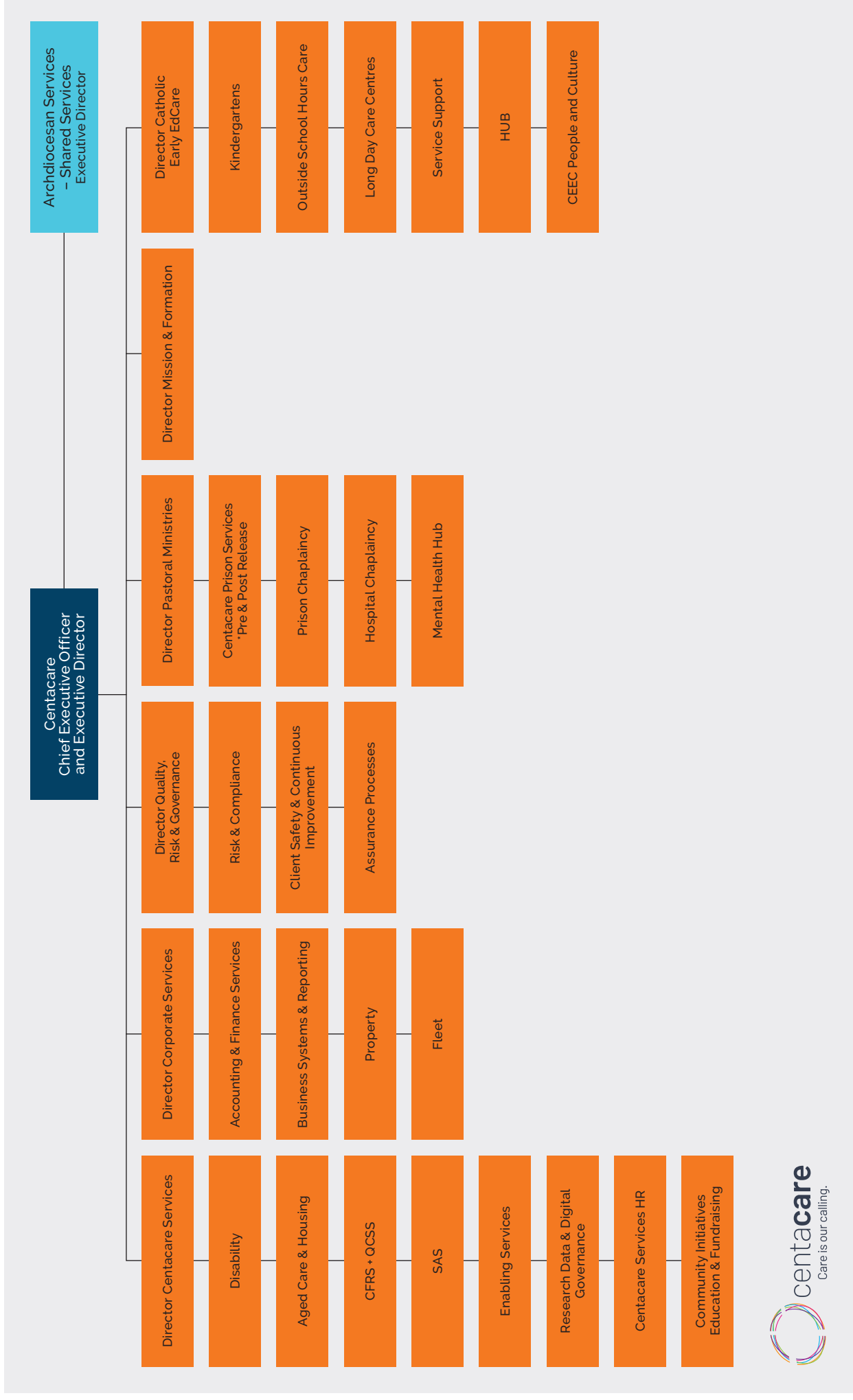
All key stakeholders across the Archdiocese participate in the assessment and approval of the information collated and brought together in approving the Archdiocese's annual Modern Slavery Statement.

Appendices

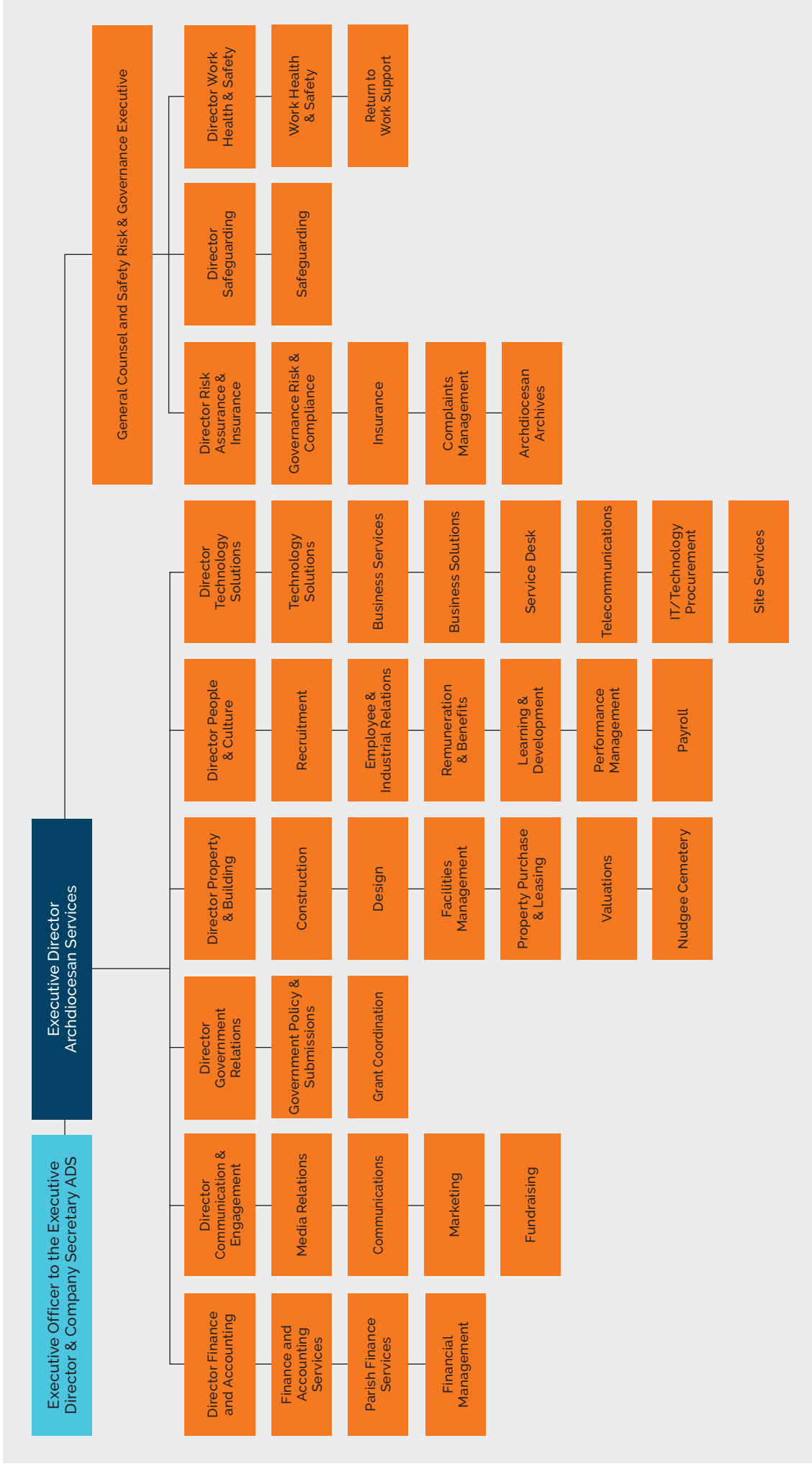
Appendix A: Brisbane Catholic Education organisation chart



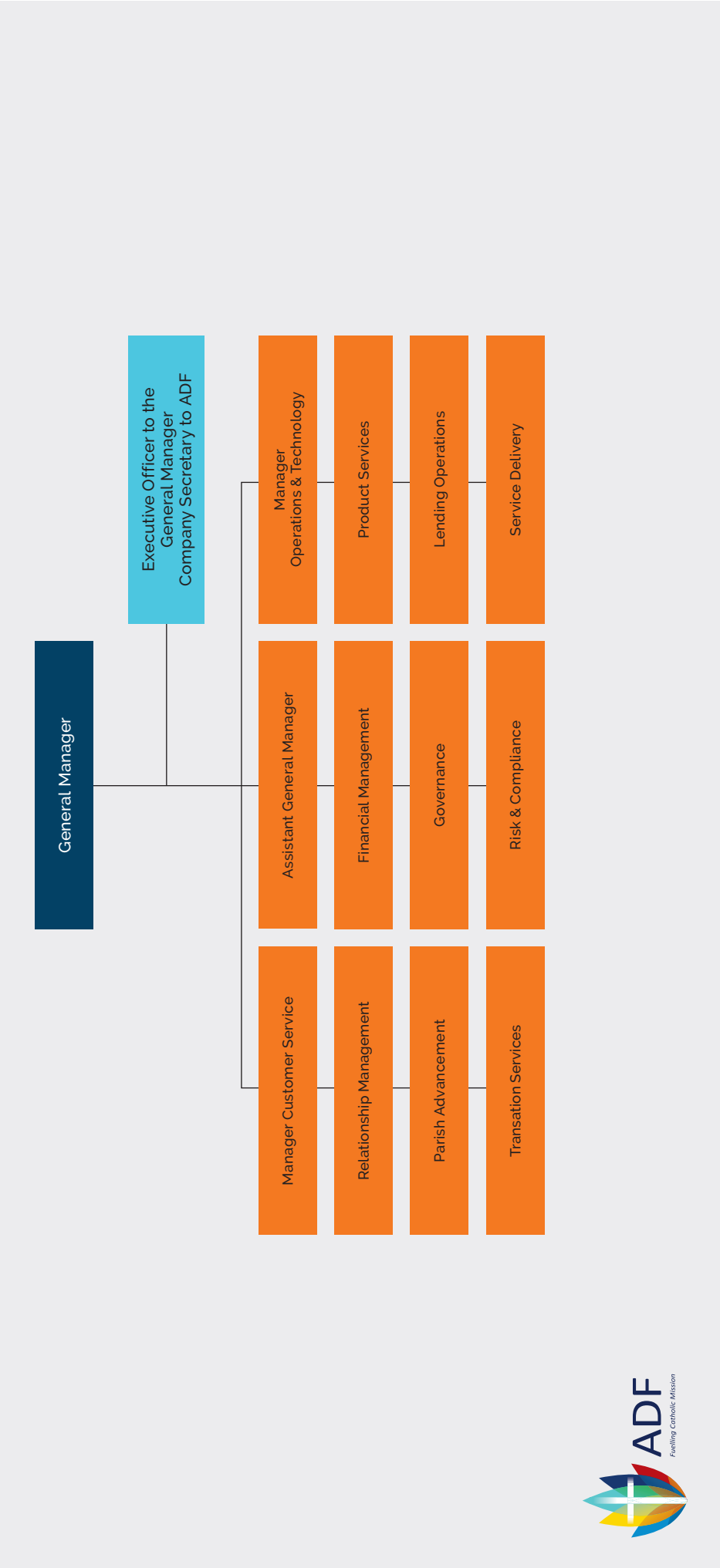
Appendix B: Centacare organisation chart



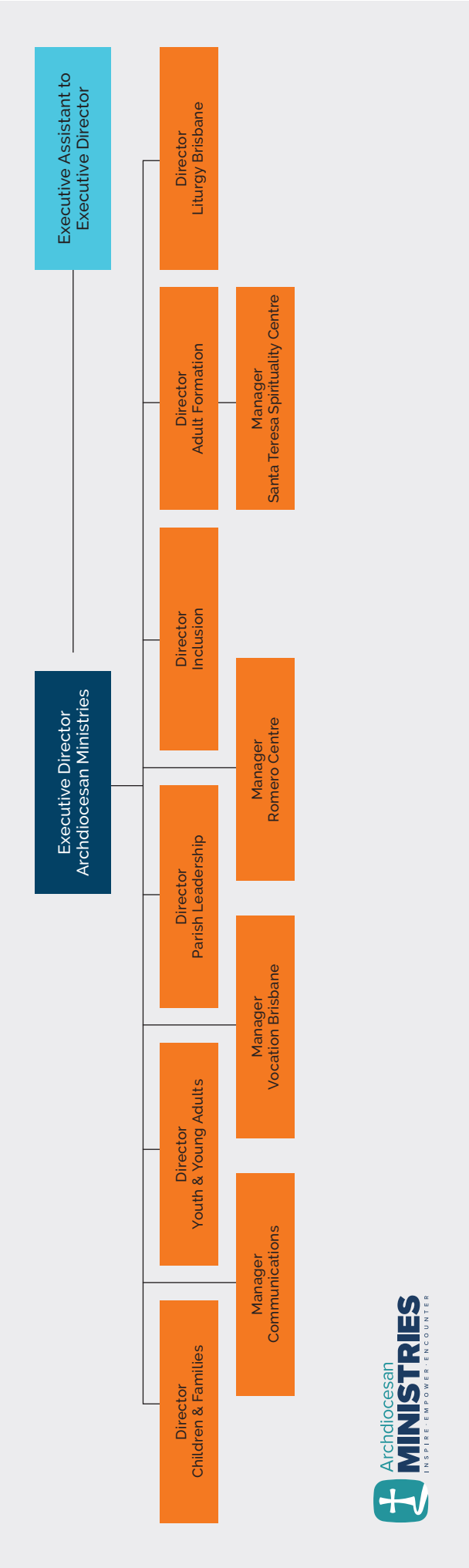
Appendix C: Archdiocesan Services organisation chart



Appendix D: Archdiocesan Development Fund organisation chart

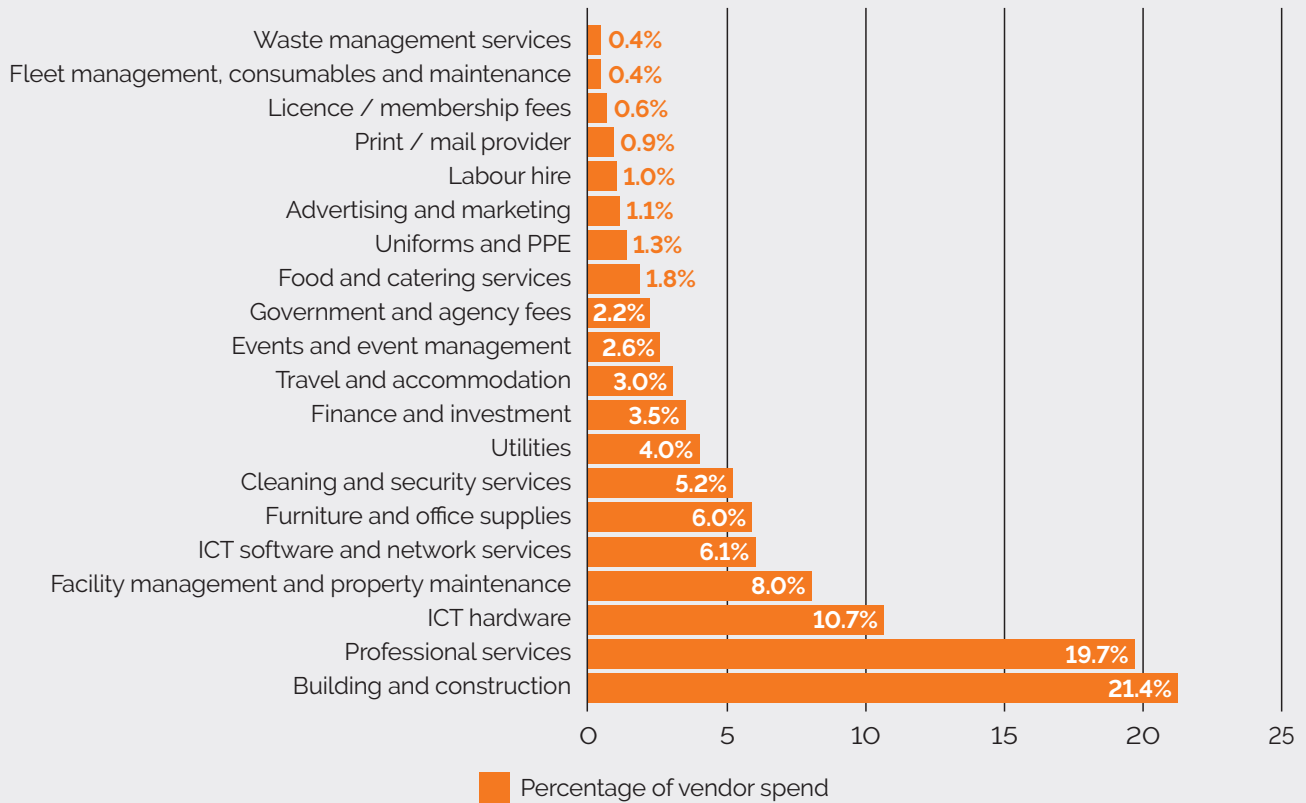


Appendix E: Archdiocesan Ministries organisation chart

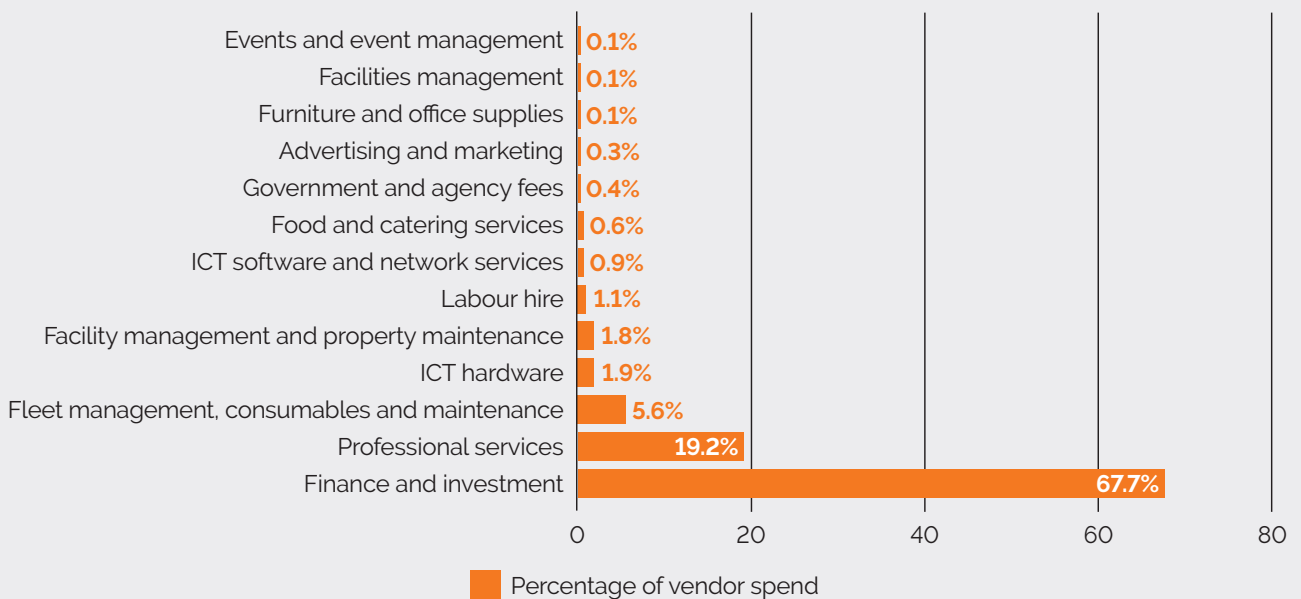


Appendix F: Agency spend by category

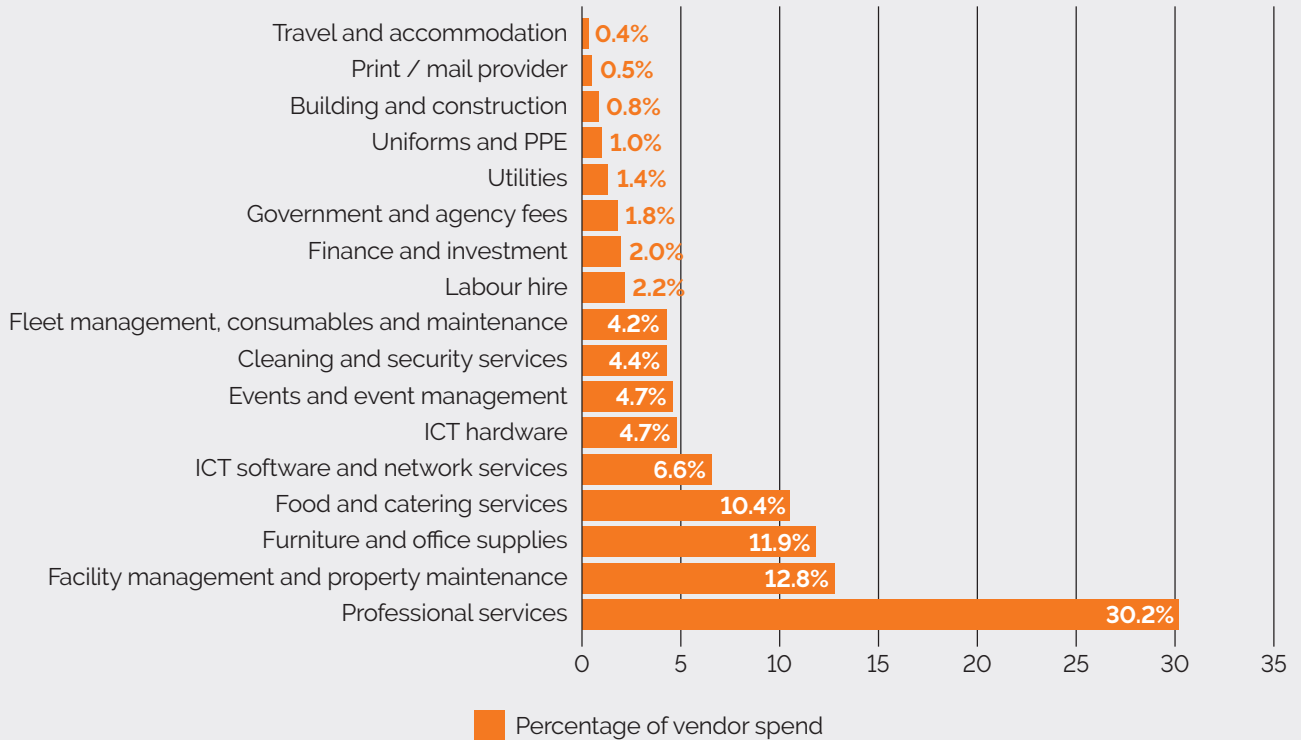
Brisbane Catholic Education – Percentage of Vendor Assessed Spend



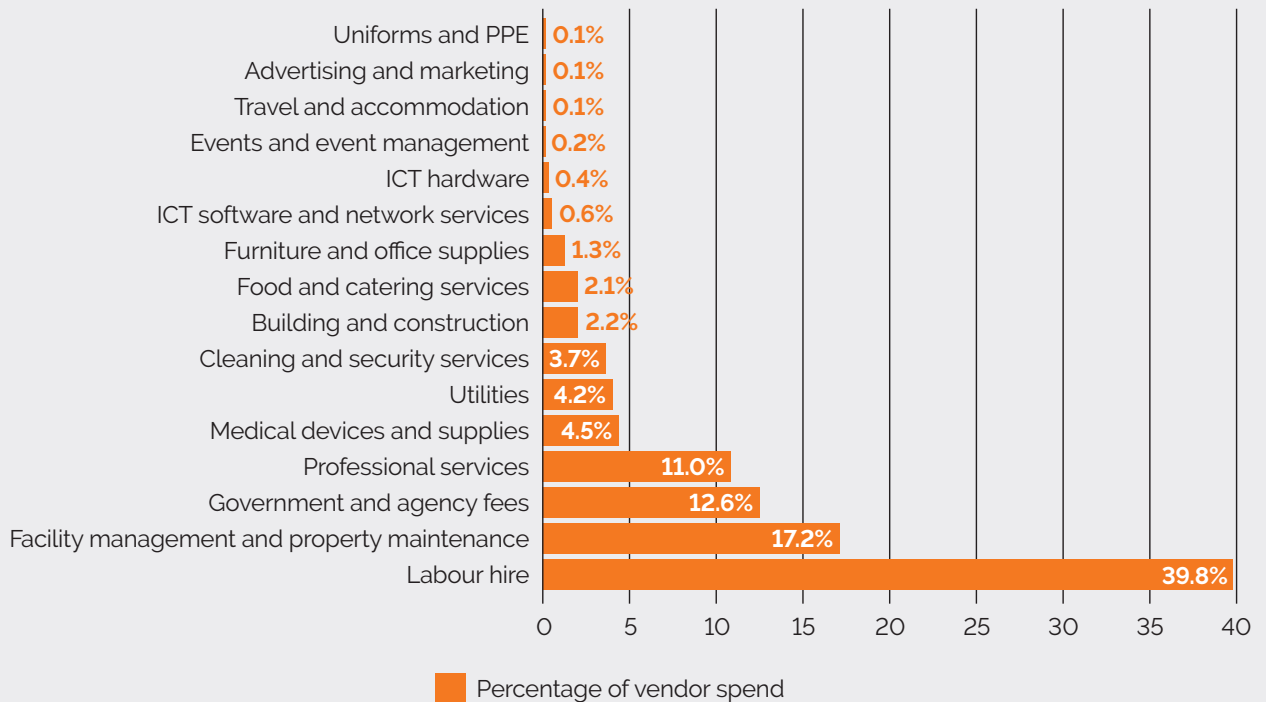
Archdiocesan Development Fund – Percentage of Vendor Assessed Spend



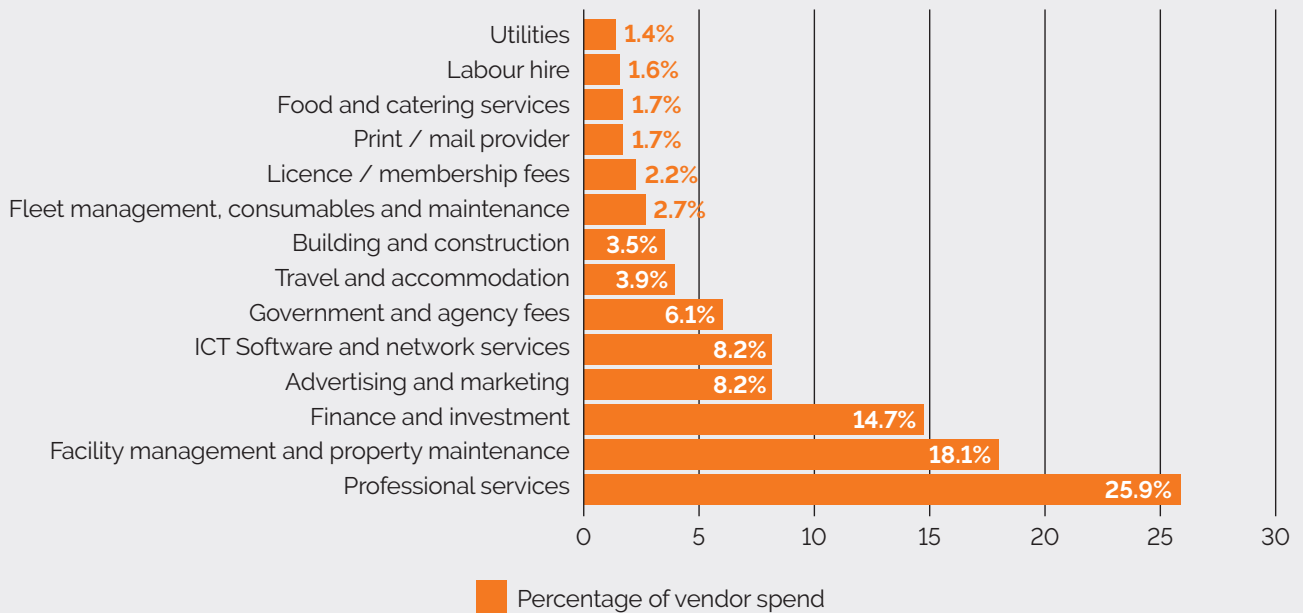
Catholic Early EdCare – Percentage of Vendor Assessed Spend



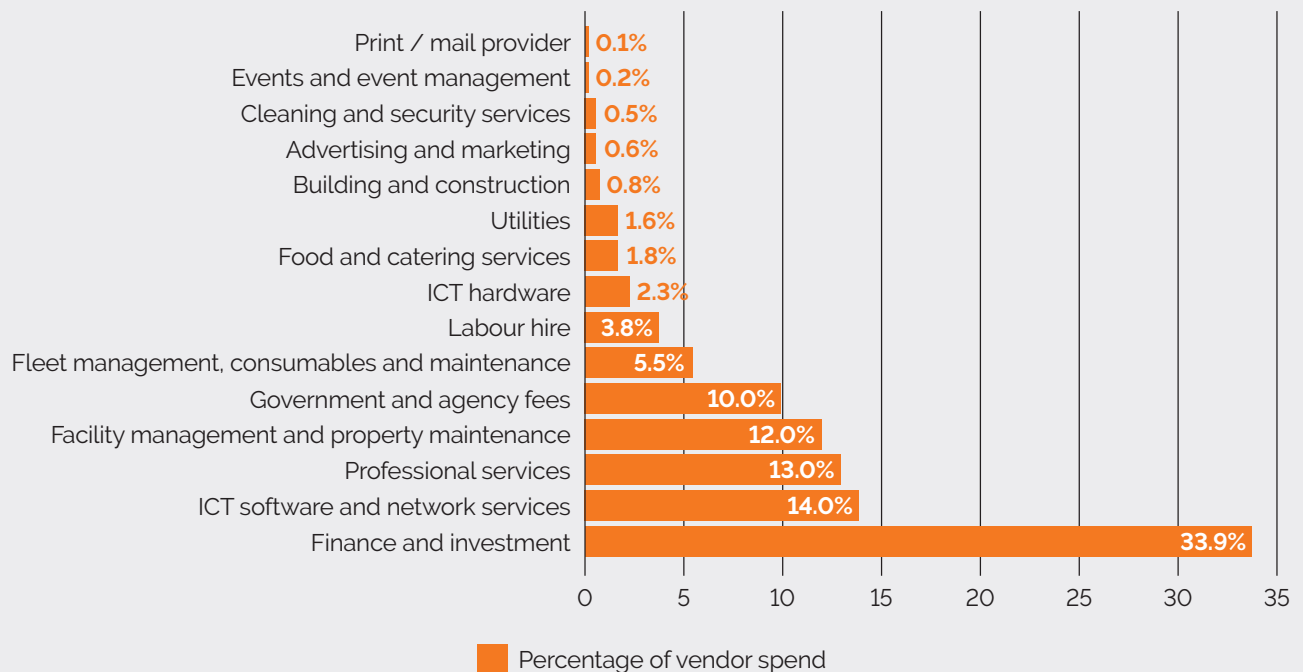
Centacare PBI – Percentage of Vendor Assessed Spend



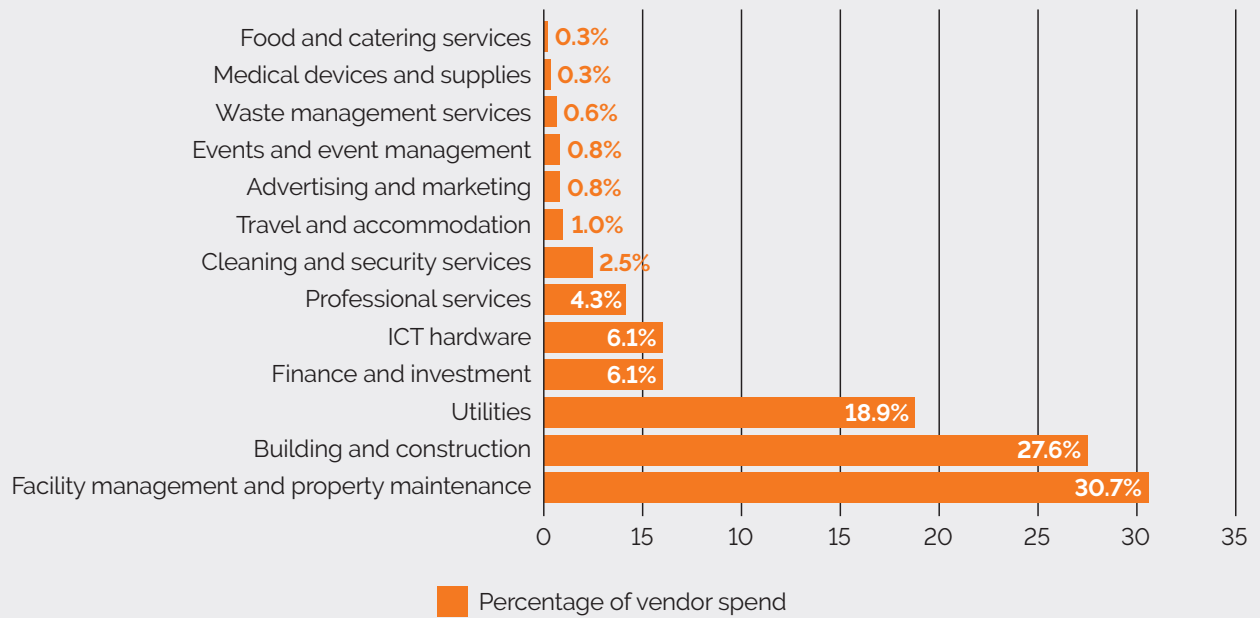
Xavier Children's Support Network – Percentage of Vendor Assessed Spend



Archdiocesan Services – Percentage of Vendor Assessed Spend



Archdiocese of Brisbane Parishes – Percentage of Vendor Assessed Spend





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ARCHDIOCESE
OF BRISBANE



Catholic Education
Diocese of Rockhampton

2025 Modern Slavery Statement

**(Reporting period:
1 January 2025 – 31 December 2025)**

ABN: 21528592597

Catholic Education – Diocese of Rockhampton
143 West Street, Rockhampton, Qld, 4700
reception@rok.catholic.edu.au



Statement from Diocesan Director - Catholic Education

I am pleased to authorise the 2025 Modern Slavery Statement for Catholic Education - Diocese of Rockhampton.

As a Catholic education organisation, we are committed to upholding the dignity, rights and freedoms of every person, consistent with the Gospel values of justice, respect and care for the most vulnerable.

This Modern Slavery Statement is made pursuant to the Modern Slavery Act 2018 (Cth) and outlines the actions taken by our organisation during the reporting period to identify, assess and address the risks of modern slavery in our operations and supply chains. It reflects our ongoing commitment to ethical conduct, responsible stewardship and continuous improvement.

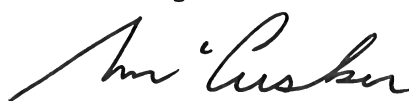
Modern slavery is fundamentally incompatible with our mission and values. As an organisation entrusted with the education and formation of children and young people, we recognise our moral and legal responsibility to ensure that our operational practices, procurement decisions and partnerships do not contribute to exploitation, coercion or the denial of human dignity.

We acknowledge that the risk of modern slavery exists across many sectors and supply chains, both in Australia and globally. We are therefore committed to strengthening our governance, policies, risk assessment processes and supplier engagement to reduce these risks and to promote transparency and accountability in line with the requirements of the Modern Slavery Act.

In developing and implementing our approach, we are grateful for the guidance and collaborative support provided by the Australian Catholic Anti-Slavery Network (ACAN). ACAN has assisted Catholic organisations across Australia to respond to modern slavery risks in a manner that is both legally robust and grounded in Catholic Social Teaching. This collaboration strengthens our collective capacity to advocate for ethical supply chains and meaningful change.

This Statement has been approved by the governing body of the organisation and represents our shared commitment to preventing modern slavery and protecting human dignity. We will continue to review and enhance our practices, working with staff, suppliers, sector partners and the wider Catholic community to ensure our response remains effective, transparent and aligned with our values.

On behalf of everyone at Catholic Education - Diocese of Rockhampton, we look forward to continuing our efforts to the creation of a just, equitable and compassionate world.



28/4/26

Mr Michael McCusker
Diocesan Director Catholic Education



Principal Governing Body Approval

This Modern Slavery Statement was approved by Bishop Michael McCarthy, the principal governing authority of The Roman Catholic Trust Corporation for the Diocese of Rockhampton, as defined by the Modern Slavery Act 2018 (Cth) ("the Act"), on *28th April 2024*

Most Rev. Michael McCarthy
Apostolic Administrator



Reporting Criteria 1 and 2: About Catholic Education – Diocese of Rockhampton

About us

Catholic Education - Diocese of Rockhampton (CEDR) is committed to high quality teaching and learning for over 19,000 students who are enrolled in schools and kindergartens in the Diocese of Rockhampton, from Bundaberg to Mackay and west to Longreach.

CEDR has a proud tradition, stretching back some 150 years and ours is a story of courage, sacrifice, struggle, vision, commitment and above all of faith and trust in God. We owe a great deal to those who have gone before us, priests, religious and parents and lay educators who worked, sometimes in difficult conditions and often against odds to provide quality Catholic education to successive generations.

Here in the Diocese of Rockhampton our Catholic schools and kindergartens strive not just to be different but to make a difference in the lives of the young people entrusted to our care. CEDR extends beyond our Catholic schools to encompass the areas of Adult Education and Faith Formation, and Religious Instruction in State schools.

Our Mission

Inspired by the person and teaching of Jesus Christ, we serve the communities of the Catholic Diocese of Rockhampton.

We provide

- Life-long faith education,
- Religious education,
- Relevant, holistic, quality education,

assisting all in their search for meaning for life.

Our Vision

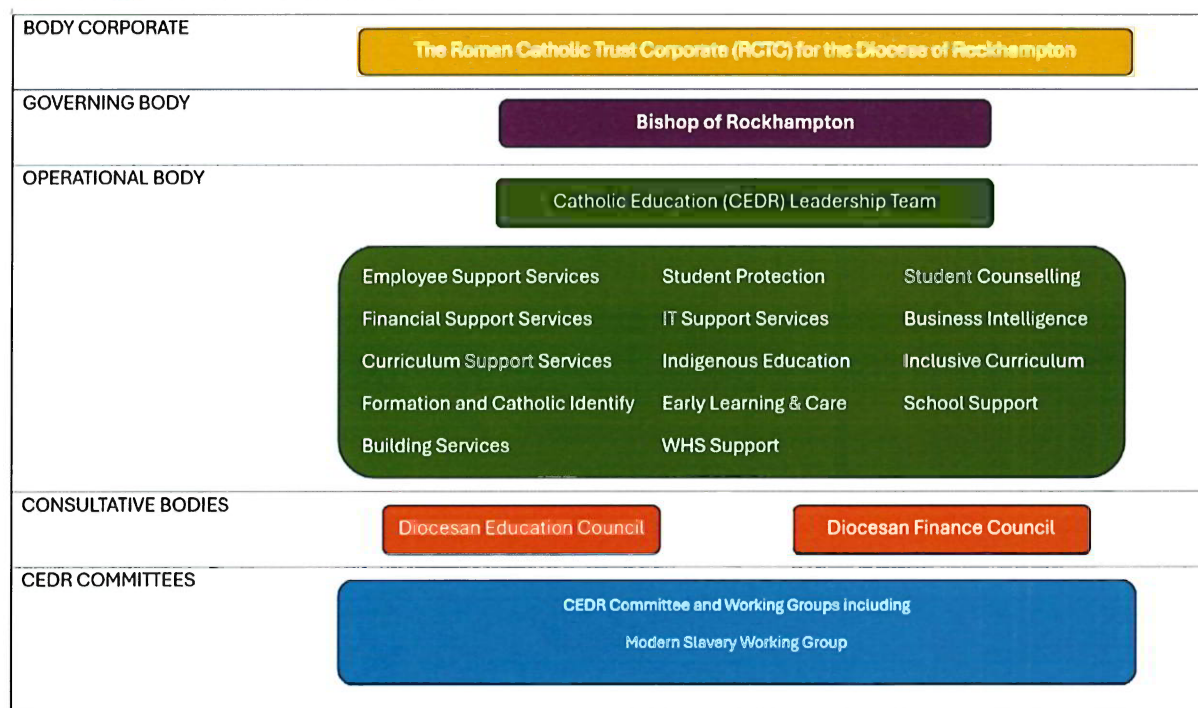
Our Catholic Kindergartens, Schools and Colleges

- Have a clear Catholic identity
- Are open and accessible to all who seek our values
- Are communities of care and safety
- Offer a relevant and holistic curriculum of quality teaching and learning
- Give witness to the message of Jesus and the mission of the Church
- Are characterised by inclusive partnerships within a community of faith

Our Commitment

- We recognise each person's inherent dignity, as created in God's image
- We are committed to ensuring First Nations children and young people are empowered to achieve their full learning potential
- We engage all in reconciliation in education
- We are committed to safeguarding and student protection, ensuring safe learning environments for all in our communities
- We are committed to sustainability practices

Our Organisational Structure



The Roman Catholic Trust Corporation for the Diocese of Rockhampton is the legal entity of the Diocese of Rockhampton which delegates the administration and management of Catholic education to Catholic Education - Diocese of Rockhampton (CEDR).

The sole Director of the Governing Body is Bishop Michael McCarthy. A Charter guides the operations of CEDR. It sets out the responsibilities the Bishop delegates to CEDR for the operation of Catholic schools and kindergartens in the Diocese of Rockhampton.

The Bishop appoints a Diocesan Education Council (DEC) to provide advice on all matters pertaining to Catholic education and its delivery. The DEC assists the Bishop in determining the educational policies and priorities for the Diocese.

Authority for leadership, administration and management of CEDR has been delegated to the Diocesan Director – Catholic Education. This includes implementation of policies and the development, implementation and review of all other governance instruments, including procedures and guidelines as required to meet civil, canonical and specific agency accountabilities. The Diocesan Director – Catholic Education is the Executive Officer for the DEC and is an ex-officio member of the DEC.

Modern Slavery Working Group

In 2025, CEDR Modern Slavery Working Group met twice to continue its work in the implementation of modern slavery initiatives. Matters requiring the consideration of the CEDR Leadership team are escalated and discussed as required.

Our operations

CEDR's head office is at 143 West Street, Rockhampton QLD 4700, and employs approximately 3,000 people. It operates kindergartens, primary and secondary schools and outside school hours care services across the Diocese, as well as providing faith education for adults and children in state schools. CEDR educates over 19,000 students in its:

- 31 primary schools (including 19 outside school hours care services)
- 8 colleges, and
- 10 kindergartens.



All schools administered by CEDR are operated on a not-for-profit basis and in accordance with the governance and management standards set out in the *Education (Accreditation of non-State Schools) Act 2018* and *Queensland Catholic Schools Not-for-Profit Guidelines (2019)*.



CEDR is reliant on Commonwealth and State Government funding for the continued delivery of quality Catholic education to the community. CEDR's gross revenue in 2025 was approximately \$447M.

Our Supply Chain

Where possible, CEDR supports local businesses and supplies are procured from Australian-domiciled suppliers. The types of goods and services procured include:

- Furniture and office supplies
- Facility management and property maintenance
- Building and construction
- Food and catering services
- Cleaning and security services
- Medical devices and supplies
- ICT Hardware
- Uniforms and PPE
- Events and event management
- Waste management services
- Finance and investment
- Travel and accommodation
- ICT Software and network services
- Fleet management, consumable and maintenance
- Advertising and marketing
- Print/mail provider
- Utilities
- Professional services
- Licence/membership fees
- Government and agency fees

Reporting Criteria 3: Modern slavery risks in operations and supply chains

Risk Assessment

CEDR is a member organisation of the Australian Catholic Anti-Slavery Network (ACAN). As part of ACAN, CEDR's Modern Slavery Liaison Officer (MSLO) and Modern Slavery Working Group use information and resources provided by ACAN to monitor and address the risks of modern slavery in its own operations and supply chain. This includes defining modern slavery risks using the ACAN Category Risk Taxonomy, a classification standard that identifies severity of actual or potential harm to people (saliency) in spend categories. The ACAN Category Risk Taxonomy is based on sources such as:

- the Global Slavery Index
- the International Labor Organisation (ILO), including definitions of modern slavery
- the Bureau of International Labor Affairs (ILAB), U.S Department of Labor
- the Global Child Forum and UNICEF

Operational Risks

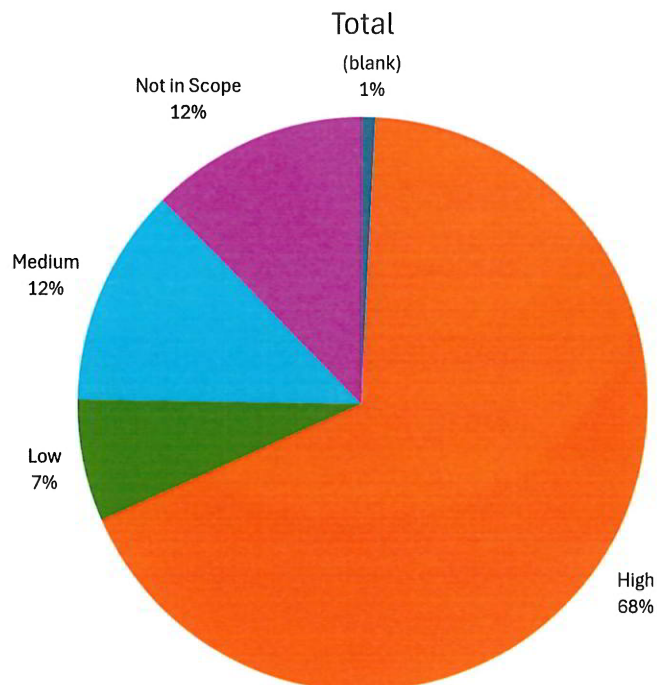
CEDR employs over 3,000 people. The Diocesan Director – Catholic Education is responsible for ensuring compliance with labour, employment, immigration and whistleblower laws to the extent that they are applicable. CEDR also employs professionally qualified people to manage human resource and industrial relations matters to ensure compliance with relevant industrial instruments and legislation.

Only a very small percentage of CEDR personnel do not have permanent residency in Australia. Non-residents are only engaged in instances where particular skills shortages exist in Australia. Where non-residents are employed or contracted, they live in Australia for the duration of their engagement, and they are paid at or higher than minimum rates applicable under Australian law.

Supply Chain Risks

Across all schools and kindergartens, CEDR has over 2000 suppliers with a total spend of approximately \$122M (2025). Modern slavery risks associated with CEDR have been identified in multiple spend categories using the ACAN Category Risk Taxonomy across 23 categories.

Sum of Total Spend



Supplier Risk	Sum of Total Spend (\$)
High	82,378,618.41
Low	8,348,381.37
Medium	14,983,299.73
Not in Scope	15,141,837.96
Other	921,506.27
Grand Total	121,773,643.7

Supplier Category	Distinct Count of Supplier Name	Sum of Total Spend
High		
Building and construction	230	47,052,818.28
Furniture and office supplies	971	9,749,368.94
Finance and Investment	5	8,686,445.09
ICT Hardware	42	7,001,886.07
Facility management and property maintenance	424	5,441,788.21
Food and catering services	206	1,814,988.85
Cleaning and security	74	1,056,982.92

Uniforms and PPE	44	707,895.01
Events and event management	49	457,083.73
Medical devices and supplies	50	309,026.43
Transport and Logistics	21	64,437.35
Professional services	13	30,286.23
Waste management services	5	4,490.10
Labour Hire	2	871.20
Not in Scope	1	250.00
Grand Total	2137	82,378,618.41

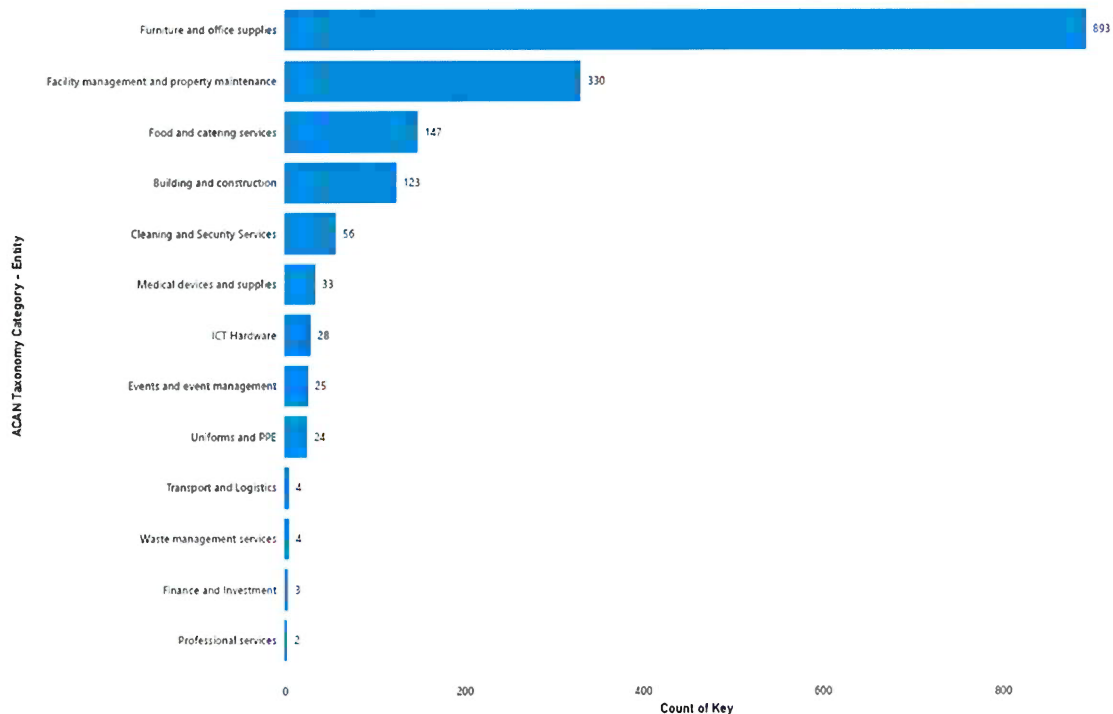
%GT Sum of Entity Total Spend - 2025 by ACAN Taxonomy Risk - Entity

ACAN Taxonomy Risk - Entity (Blank) High Low Medium Not in Scope



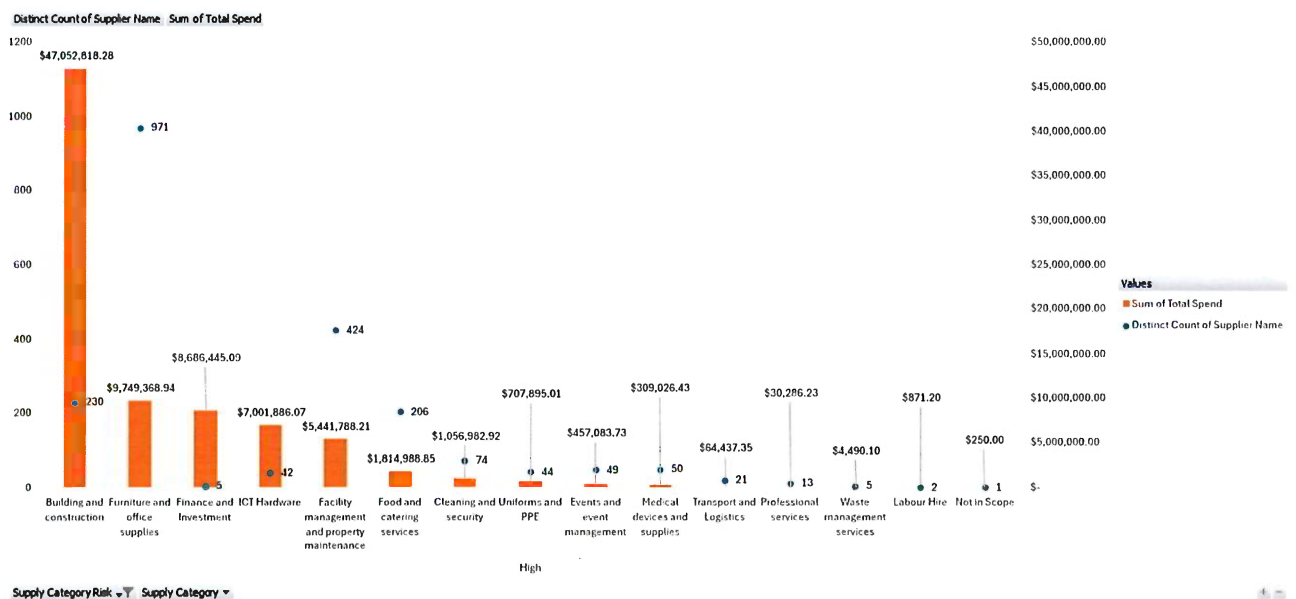
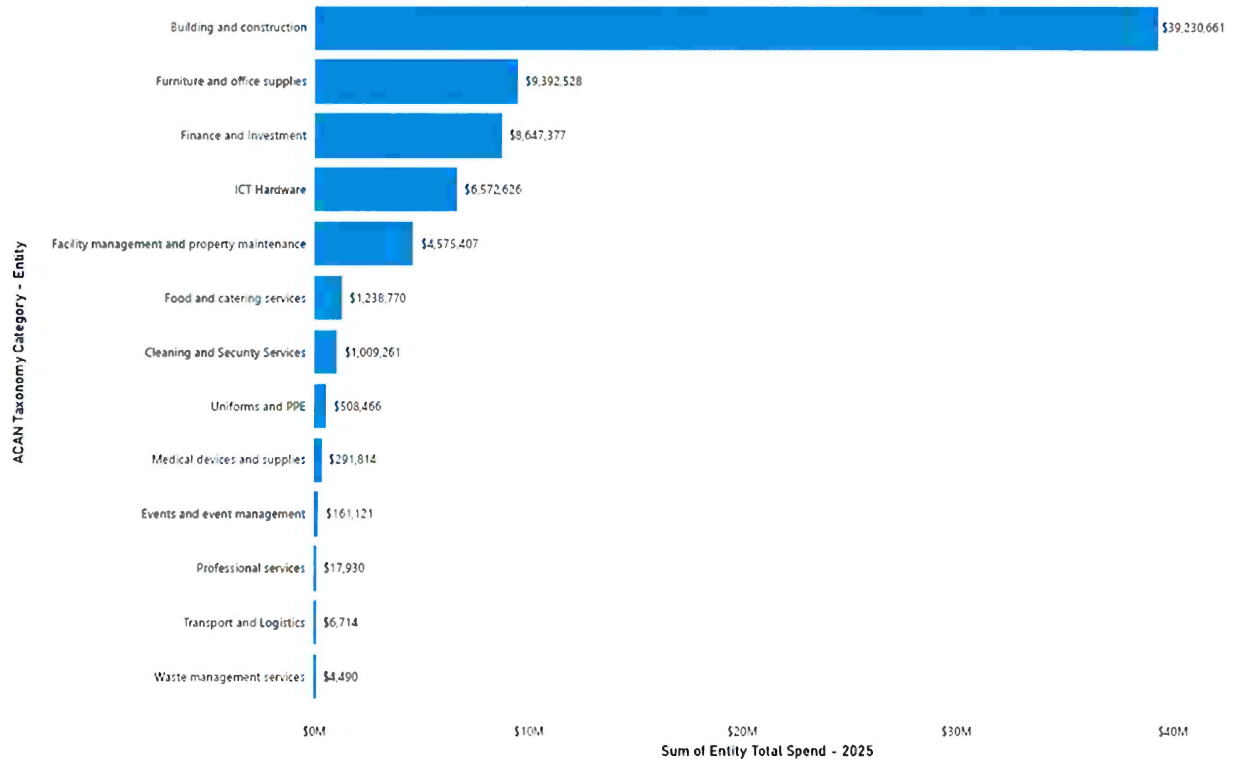
0% 20% 40% 60% 80% 100%
%GT Sum of Entity Total Spend - 2025

Count of Key by ACAN Taxonomy Category - Entity





Sum of Entity Total Spend - 2025 by ACAN Taxonomy Category - Entity



CEDR's procurement procedure includes 'non-price' criteria that are considered when selecting suppliers. Social and economic benefits is one of the considerations that are assessed when undertaking procurement and include:

- Adherence to Modern Slavery requirements
- Engagement with local contractors / sub-contractors (i.e. local content)
- Engagement with indigenous businesses in accordance with the CEDR Reconciliation Action Plan.

Reporting Criteria 4: Steps taken to address modern slavery risk

Supplier Engagement

ACAN continue to support CEDR with supplier engagement considerations and activities. The ACAN Program provides supplier engagement support and data, enabling a systematic and comprehensive supply chain risk assessment. In 2025 the ACAN Modern Slavery Risk Management Program launched a new purpose-built data management platform - ROTA. ROTA centralises the ACAN Risk Management Program framework and facilitates supplier performance evaluation and engagement.

With support through the ACAN supplier engagement process, 548 contractors engaged with the supplier survey process in 2025, with 63 joining Sedex. Further engagement strategies will continue with other high-risk suppliers utilising the ACAN survey process.

CEDR has been a member of Sedex via ACAN during the reporting period. Sedex is a data exchange platform, designed to enhance data sharing and minimise the burden of risk assessments and risk validation, but mutually recognising the results produced for specific shared suppliers, produced by other members' efforts, and vice-versa.

Our organisation

CEDR complies with the Fair Work Act employment awards and collective agreements with the directly employed workforce, through a variety of policies and procedures, including:

- Employment contracts
- Code of Conduct
- Student protection and safeguarding policies and procedures
- Grievance and resolution procedures
- Whistleblower Policy
- WHS policies and procedures

Modern Slavery Working Group

In 2025, CEDR Modern Slavery Working Group met twice to continue its work in the implementation of modern slavery initiatives. Matters requiring the consideration of the CEDR Leadership team are escalated and discussed as required.

Representatives from ACAN joined the working group meetings to provide support on various matters including reporting requirements and supplier engagement. The working group will continue to consider how ACAN tools can best be adapted for deployment including initiatives to engage with suppliers. The group will continue to provide advice on the management of modern slavery risks and building awareness of modern slavery throughout the organisation.

Modern Slavery Policy

The Diocese's Modern Slavery Policy was endorsed and published in 2023. The purpose of the Policy is to document the Diocese's commitment to the eradication of modern slavery from its operations and supply chains. CEDR commits and contributes to the overarching policy framework. A CEDR Modern Slavery Policy is under development and is expected to be approved by the Bishop in 2026.

Australian Catholic Anti-Slavery Network ('ACAN')

In 2025, CEDR continued to work under the umbrella of the Australian Catholic Anti-Slavery Network (ACAN) towards eradicating modern slavery. CEDR actively participates in the ACAN Modern Slavery Risk Management Program including participation in monthly webinars hosted by ACAN that provide updates about the latest modern slavery resources available to members and suppliers. The support and resources provided by ACAN enable CEDR to strengthen its approach to embedding modern slavery risk management in systems and processes.

ACAN Supplier Engagement

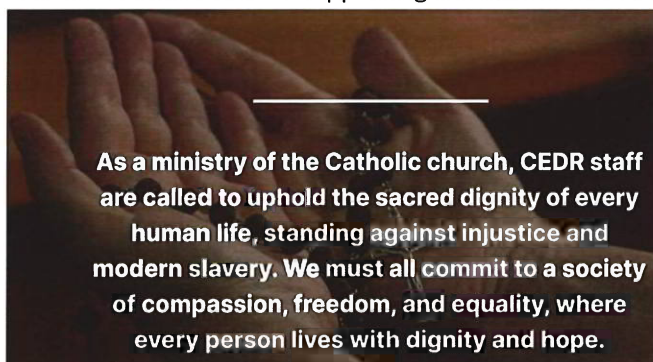
The ACAN Program provides supplier engagement support and data, enabling a systematic and comprehensive supply chain risk assessment. In 2025 the ACAN Modern Slavery Risk Management Program launched a new purpose-built data management platform ROTA. ROTA centralises the ACAN Risk Management Program framework and facilitates supplier performance evaluation and engagement:

1. Evaluation of the modern slavery risk within operations and supply chains, using the ACAN Risk Taxonomy.
2. ACAN Supplier Survey to identify supplier revenue, number of employees, countries of origin for goods sourced overseas, workforce contractual arrangements and Sedex membership status.
3. Supplier education on modern slavery and risk management in key areas: cleaning, building and construction, procurement of labour, labour hire and services, sourcing goods from overseas, grievance mechanisms and remediation.

4. Onboarding suppliers to Sedex requires a business address, contact details and goods or services provided.
5. Sedex Self-Assessment Questionnaire (SAQ) helps suppliers to evaluate their practices against established standards and identify areas for improvement.
6. Desktop review to identify key actions required from suppliers.
7. Enhance supplier screening using Know Your Client (KYC) intelligence software.
8. Corporate Social Compliance Audits provide a point in time, objective and independent verification process of supplier alignment with local laws and worker wellbeing standards.
9. Domus 8.7 Index modern slavery statement assessment on selected suppliers in high-risk categories.
10. ACAN Prequalified Supplier Directory - a list of preferred suppliers accessible to Catholic organisations.

Staff Awareness and Training

CEDR is committed to supporting its staff to raise their awareness and understanding of modern



slavery, including recognising the causes and mechanisms available to escalate poor labour practices, unsafe working conditions and other indicators of modern slavery.

All CEDR staff complete mandatory modern slavery training at the commencement of the year.

Supplier risk identification and prioritisation

Organisational supplier spend was examined and the highest risk supplier categories were identified. Efforts will now be directed towards engaging with those suppliers to help them to understand the importance CEDR places on eradicating modern slavery from supply chains.

Remediation

CEDR is committed to ensuring it provides appropriate and timely remedy to people impacted by modern slavery in accordance with the *United Nations Guiding Principles on Business and Human Rights*, *Commonwealth Modern Slavery Act 2018 – Guidance for Reporting Entities* and relevant

Australian laws. This includes providing for, or cooperating in, actions to address harms to people and root causes to mitigate future risks if CEDR is found to have caused or contributed to modern slavery.

Due to the complexity of remediation, the need for specialist resources, and to ensure the most comprehensive and rights-compatible outcomes for people impacted by modern slavery, the Catholic Diocese of Rockhampton is a founding partner of *Domus 8.7* - an independent program to provide remedy to people impacted by modern slavery. By partnering with *Domus 8.7*, the Catholic Diocese of Rockhampton can help people impacted by modern slavery to achieve meaningful outcomes that can be reported on and continuously improve risk management and our response.

When suspicions of modern slavery practices come to our attention through whistle-blower or other channels and a person is in immediate danger, staff will contact relevant law enforcement agencies. If staff have concerns or identify any issues and need expert advice, the matter will be referred through *Domus 8.7* for an assessment, investigation, action planning and implementation of a remediation process.

Domus 8.7 provides CEDR with:

- resources that enable us to listen to workers (grievance channel)
- a 24/7 careline for workers on our sites, staffed by professional counsellors
- direct support to people impacted by modern slavery
- guidance and technical assistance to prevent, identify and remediate modern slavery
- a documented process to assess if an organisation has caused, contributed or is directly linked to modern slavery and modern slavery indicators

Domus 8.7 empowers people impacted by modern slavery to have choice and control over what forms of remediation are meaningful to them and to engage safely with business/supply chain actors. Supports may include:

- modern slavery indicator assessment
- needs assessment, case coordination, response and remediation planning
- referrals to community, social services, unions
- transport, accommodation, financial and food support
- legal support, referrals, accompaniment and advocacy
- job training, retraining and redeployment
- accompaniment and advocacy to engage with government and law enforcement agencies
- opportunities to contribute lived expertise to improve modern slavery responses

The *Domus 8.7* Advisory Committee Members also include a person with lived expertise, Mr Moe Turaga. *Domus 8.7* is a registered charity with the Australian Charities and Not-for profits Commission (ACNC) and is an endorsed Public Benevolent Institution with Deductible Gift Recipient (DGR) status. ABN 244 72497189

Modern Slavery Action Plan progress

OBJECTIVE	PROPOSED ACTION	CURRENT STATUS
Commitment		
Engage top-level management and set direction	Deliver modern slavery awareness presentation to CEDR Leadership Team and DEC	Modern slavery awareness presentation delivered
Adopt Modern Slavery Policy	Develop and promulgate Modern Slavery Policy	- Diocesan Modern Slavery Policy approved - Development of CEDR Modern Slavery Policy in progress
Establish a Modern Slavery Working Group	- Develop Terms of Reference for Working Group - Formally appoint members to Working Group	- Working Group Terms of Reference approved - Working Group members formally appointed
Modern slavery responsibilities defined	Allocate modern slavery responsibilities to staff where applicable	Modern slavery responsibilities allocated
Action Plan & Monitoring		
Prepare and implement a modern slavery action plan or strategy to address gaps	Develop Action Plan	Working Group meets regularly to develop and monitor strategies captured in Action Plan. Supported by ACAN
Monitor progress and ensure continual improvement	- Hold regular Working Group meetings to monitor progress and propose improvements - Complete entity profile annually	- Working Group discusses progress and opportunities for improvement - Entity profile performed annually to produce risk scores for management controls
Supplier Risk		
Prioritise suppliers based on spend and potential risk	Analyse supplier data at least annually to determine highest risk	Data is gathered and analysed annually to determine highest risk suppliers
Clearly outline expectations to suppliers	- Email high-risk suppliers inviting them to complete ACAN survey and attend ACAN webinar - Develop and promulgate Supplier Code of Conduct - Embed modern slavery clause(s) in supplier contracts	- Letters sent to high-risk suppliers, outlining the importance CEDR places on the eradication of Modern Slavery - Diocesan Supplier Code of Conduct developed

OBJECTIVE	PROPOSED ACTION	CURRENT STATUS
Engage, Educate & Respond		
Engage and train management, employees and contractors	• Roll out awareness presentation and e-learning modules to staff involved in procurement • Raise awareness of modern slavery through social media	• Diocesan Councils and all CEDR staff have received awareness presentation • Modern Slavery Policy shared on Diocesan Facebook page and LinkedIn
Engage and educate highest priority suppliers	• Offer educational resources to high-risk suppliers (e.g., supplier webinars)	• 548 suppliers completed surveys providing insight into actual risk; 23 suppliers attended capacity building webinars and 68 were invited to join Sedex.
Establish remedy pathway to respond when slavery practices identified in operations or supply chain	• Refer to <i>Reporting Criteria 4</i> section above • Develop and implement Whistleblower Policy	• Refer to <i>Reporting Criteria 4</i> section above • CEDR Whistleblower Policy developed and approved

Reporting Criteria 5: Effectiveness of steps taken under Criterion 4

CEDR also uses the following performance indicators to measure its progress of mitigating the risk of modern slavery.

	ACTIVITY	2024	2025
INTERNAL / STAFF	Hours spent on modern slavery activities	965	970
	Individual staff completed eLearning	2,972	3,272
	eLearning modules completed	2,972	3,272
	MSWG meetings held	2	2
EXTERNAL / SUPPLIER ENGAGEMENT	Total number of suppliers	3,585	2,170
	Number of suppliers with visible contact information and ABN	3,104	2,170
	Number of suppliers across high-risk categories	2,866	1,641
	Number of ACAN Supplier Surveys completed	413	266
	Supplier staff attending capacity building webinars (suppliers engaged on MS)	46	23
	Invited to join Sedex	78	68
	Joined Sedex	64	63
	Sedex SAQ completed	81	88
	Sedex Members Ethical Trade Audit (SMETA) Social audits	17	13
	Corrective actions	75	86
DOMUS 8.7 EXTERNAL REFERRALS	Contacts made via worker voice / grievance mechanism	0	0
	Referrals for advice and assistance	0	0
	Individuals identified or referred for modern slavery assessment	0	0
	Individuals with modern slavery cases remediated	0	0

Supplier Ethical Data Exchange (SEDEX)

In 2025, the ACAN Program adopted a globally recognised risk measurement system through SEDEX. SEDEX is a global platform that helps companies manage and share ethical and responsible supply chain data to improve transparency, compliance and sustainability.

CEDR completed the SEDEX Self-Assessment Questionnaire (SAQ) which is a set of questions about business practices, management systems, policies and information about workers. Below is an explanation of how scoring is calculated using the SEDEX SAQ and CEDR's 2025 risk scores and management controls that serve as our benchmark for continuous improvement.

Explanation of SEDEX Scoring

Combined Risk Score (scale of 0/10) - calculated from inherent risk and site characteristics, adjusted for management controls and audit results. The score is broken down by pillar and highlights strengths and opportunities to focus our efforts on key areas that drive ethical and sustainable practices.

Inherent Risk Score (scale of 0/10) - predicts potential risks based on a country/region, and sector. Spanning all four pillars, this score is broken down by topics. It can be used as a baseline to identify and prioritise areas for improvement in operations. This score shows the natural risks of doing business in a specific country or sector. It does not include any details about individual sites.

Labour Standards Pillar - assesses location and industry factors that could increase labour risks, such as vulnerable worker populations or high rates of workplace violations.

Health and Safety Pillar - considers regional and industry-specific health and safety risks, including local regulations and industry accident rates.

Business Ethics Pillar - assesses industry and location risks related to unethical practices, such as high corruption levels or weak regulatory oversight.

Environment Pillar - examines the environmental impact of the site's industry and location, such as pollution levels or resource use that may create regulatory or compliance risks.

Site Characteristics Risk Score (scale of 0/10)

Highlights potential risks based on your suppliers' SAQ responses in the Labour Standards and Health and Safety pillars. This score can be used to assess and support the implementation of policies and processes that mitigate workplace risks within your supply chain. For the Environment SAQ, site characteristics consider the type of work, business and location (e.g. proximity to sensitive areas). For the Core SAQs, risks are assessed based on the nature of the work, such as exposure to heavy machinery or hazardous materials.

Labour standards - reflects labour-related risks like employment practices, workers rights and wages based on SAQ responses. High-risk activities in this area can raise the score.

2025 Modern Slavery Statement



Health and Safety - based on SAQ responses to questions about site-specific health and safety factors, such as equipment usage, handling of chemicals or accident risks.

Management Controls Score (scale of 0/5)

This score measures how well policies or processes are in place to reduce the risks from the site characteristics. It is also based on answers in the SAQ. A Poor score of 0-0.9 indicates that there are few or no controls in place. An Advanced score of 4-5 indicates that there are exemplary controls that exceed compliance and drive innovation.

Labour standards - evaluates policies and processes to ensure fair labour standards and worker protections are effectively managed.

Health and Safety - reviews the adequacy of safety protocols, emergency preparedness and training efforts to manage health and safety risks on site.

Business Ethics - evaluates controls against unethical practices such as anti-bribery policies, compliance with legal standards and transparent operations.

Environment - looks at policies managing environmental impact, resource efficiency and waste reduction practices to align with sustainability standards.

CEDR's SAQ Risk Score Summary

Company name

Catholic Education - Diocese of
Rockhampton

ZC number: ZC419233027

Site name

Catholic Education Diocese of
Rockhampton

ZS number: ZS1000092522

Combined risk score



3.4/10

Low risk

Score breakdown by pillar

Highlight strengths and opportunities to help businesses focus their efforts on key areas that drive ethical and sustainable practices.

Inherent risk ● 2.9/10 (Low risk) ⓘ

Labour standards ⓘ

2.9/10

Health and safety ⓘ

2.2/10

Business ethics ⓘ

1.8/10

Environment ⓘ

3.3/10



Site characteristics risk ● 3.9/10 (Low risk) ⓘ

Labour standards ⓘ

4.1/10

Health and safety ⓘ

3.4/10

Management controls 4.3/5 (Advanced)

Measures suppliers' risk management (0–5, with 5 as best) to assess effectiveness and target improvements.

Labour standards ⓘ

4.4/5

Advanced

Health and safety ⓘ

4.1/5

Advanced

Business ethics ⓘ

4.5/5

Advanced

Section title	Points available	Points achieved	% of points achieved	Score
Profile	1	1	100%	5.0 (Advanced)
Management systems	31	30	96.8%	4.9 (Advanced)
Freely chosen employment	4	4	100%	5.0 (Advanced)
Freedom of association	7	7	100%	5.0 (Advanced)
Health and safety	53	43	81.1%	4.1 (Advanced)
Working hours	6	6	100%	5.0 (Advanced)
Discrimination	41	34	82.9%	4.2 (Advanced)
Discipline and grievance	28	28	100%	5.0 (Advanced)
Communities and human rights	12	4	33.3%	1.7 (Fair)
Business ethics	10	9	90%	4.5 (Advanced)

Reporting Criteria 6: Internal Consultation

In 2025, CEDR established their own Modern Slavery Working Group after several years of being members of the broader Diocesan Working Group (which included CatholicCare and the Diocesan Officers on behalf of parishes).

Staff awareness and capacity building is provided to all CEDR staff through the mandatory modern slavery staff training program.

Modern slavery risk management activities will continue to be delivered to CEDR personnel at every opportunity to promote and develop organisational awareness.

Reporting Criteria 7: Any other relevant information

In 2025, the Rockhampton diocese was fortunate to host modern slavery awareness raising events in Rockhampton and Bundaberg with ACAN lived experience consultant Moe Turaga. In March, Rockhampton Bishop, Michael McCarthy and the Diocese's Pastoral Council hosted Moe at the Duhig Centre in Rockhampton where Moe shared his personal experiences in the horticulture sector with members of the Pastoral Council and discussed the pastoral needs of temporary migrant workers from the Pacific. Moe also addressed more than 45 parishioners at Bundaberg Parish's MenAlive Breakfast.

During the visit to Rockhampton, Moe congratulated Rockhampton's Catholic Education Office for its approach to annual, mandatory modern slavery awareness training for all staff.



Moe Turaga and Bishop Michael McCarthy

Modern Slavery Statement

1 January to 31 December 2025



A Special Work of St Vincent de Paul Society Queensland



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About us

With deep roots in Queensland and a community-minded approach, our local teams offer care and support that feels personal, connected, and always with you.

We offer a comprehensive range of services including; aged care at home, retirement living, aged care living, and specialised services.

Our workforce of nearly 5,000 staff and 120 volunteers proudly serves thousands of clients every day across more than 51 locations Queensland-wide.

Ozcare operates 19 residential aged care services, a hospital, five day respite centres and eight retirement living services across Queensland. In addition, we provide support and health care services to thousands of people in their own homes. Each year, we typically provide care and support for over 30,000 people in Queensland. We are a not-for-profit Australian resident company limited by guarantee and are headquartered in Brisbane – our services are provided solely within Australia.

Ozcare purchases products to meet our business and service delivery needs – ranging from staff uniforms, fresh food and produce, office products, household and cleaning items, medical products and consumables, and trades and professional services. We also regularly engage construction companies in our building programs.

Guiding principles

Ozcare is a leading not-for-profit organisation supporting Queenslanders.

Ozcare was established as a special work of the St Vincent de Paul Society Queensland. The Society, as a lay Catholic organisation, aspires to live the gospel message by serving Christ in the poor with love, respect, justice, hope and joy, and by working to shape a more just and compassionate society.

Mission

Inspired by the Vincentian spirit, Ozcare commits to supporting our clients to live their best lives through the provision of compassionate, professional and personalised aged care, community and health services.

Values

Our values form the basis of our culture and guide everything we do. We are committed to embedding these values throughout Ozcare.

Respect - Serving all regardless of belief, ethnic or social background, health and gender.

Integrity - The courage to do what is right for our clients, colleagues and our organisation.

Compassion - Welcoming and serving all with care and understanding, and without judgement.

Empathy - Enhancing the lives of our clients through the delivery of personalised care and support.

Endorsement

The Board of Ozcare provides oversight of the organisation's responsibilities under the Modern Slavery Act 2018 and ensures that our commitments are being translated into practical actions across the organisation. Guided by our mission and values, the steps outlined in this statement demonstrate how our approach to identifying, managing and reducing modern slavery risks is being operationalised through established governance processes, ongoing monitoring and continuous improvement.

This Modern Slavery Statement was approved by the principal governing body of Ozcare as defined by the Modern Slavery Act 2018 (Cth) ("the Act") on 22 May 2025.

This Modern Slavery Statement is signed by a responsible member of Ozcare as defined by the Act.

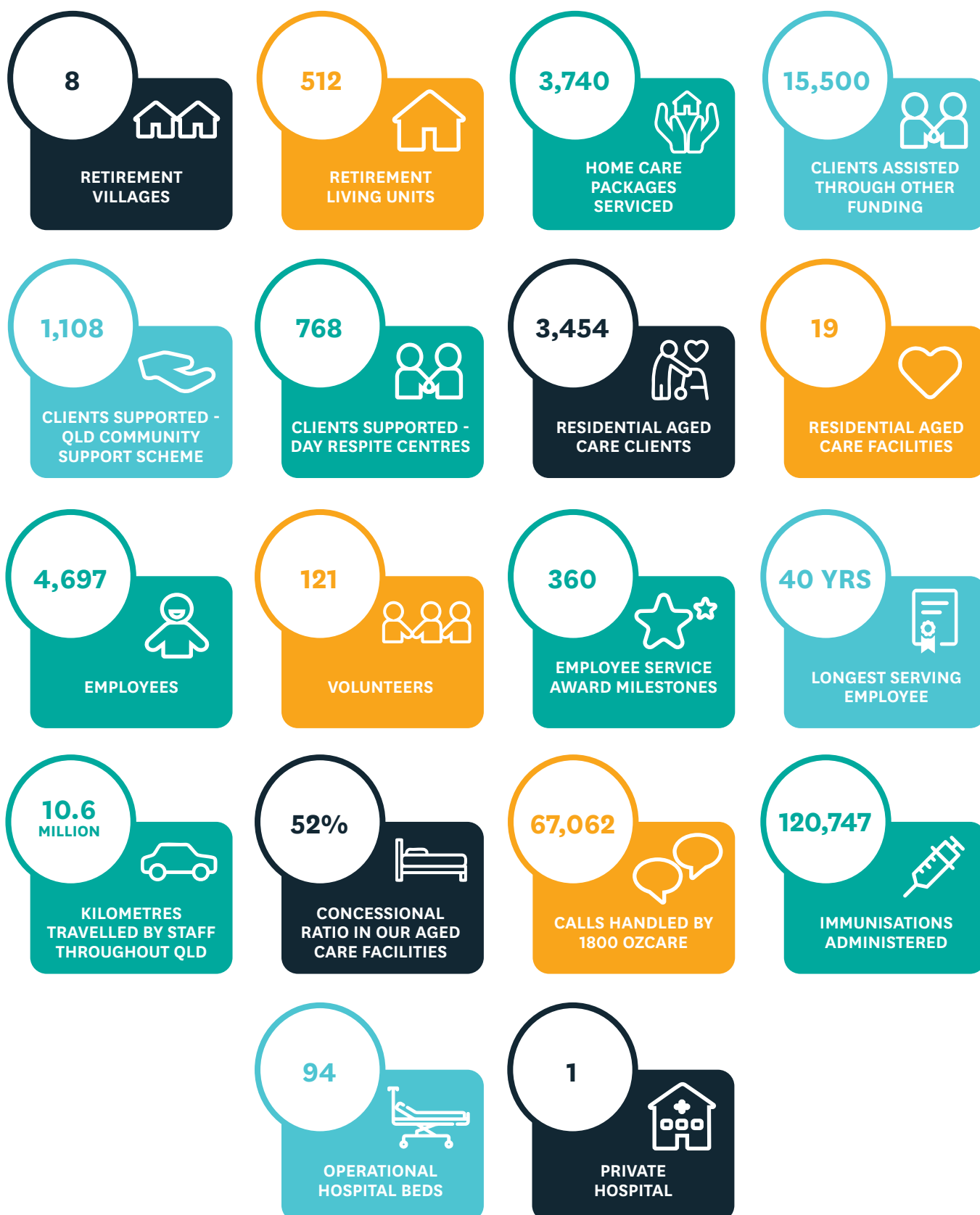


Robert Baker
Chairman

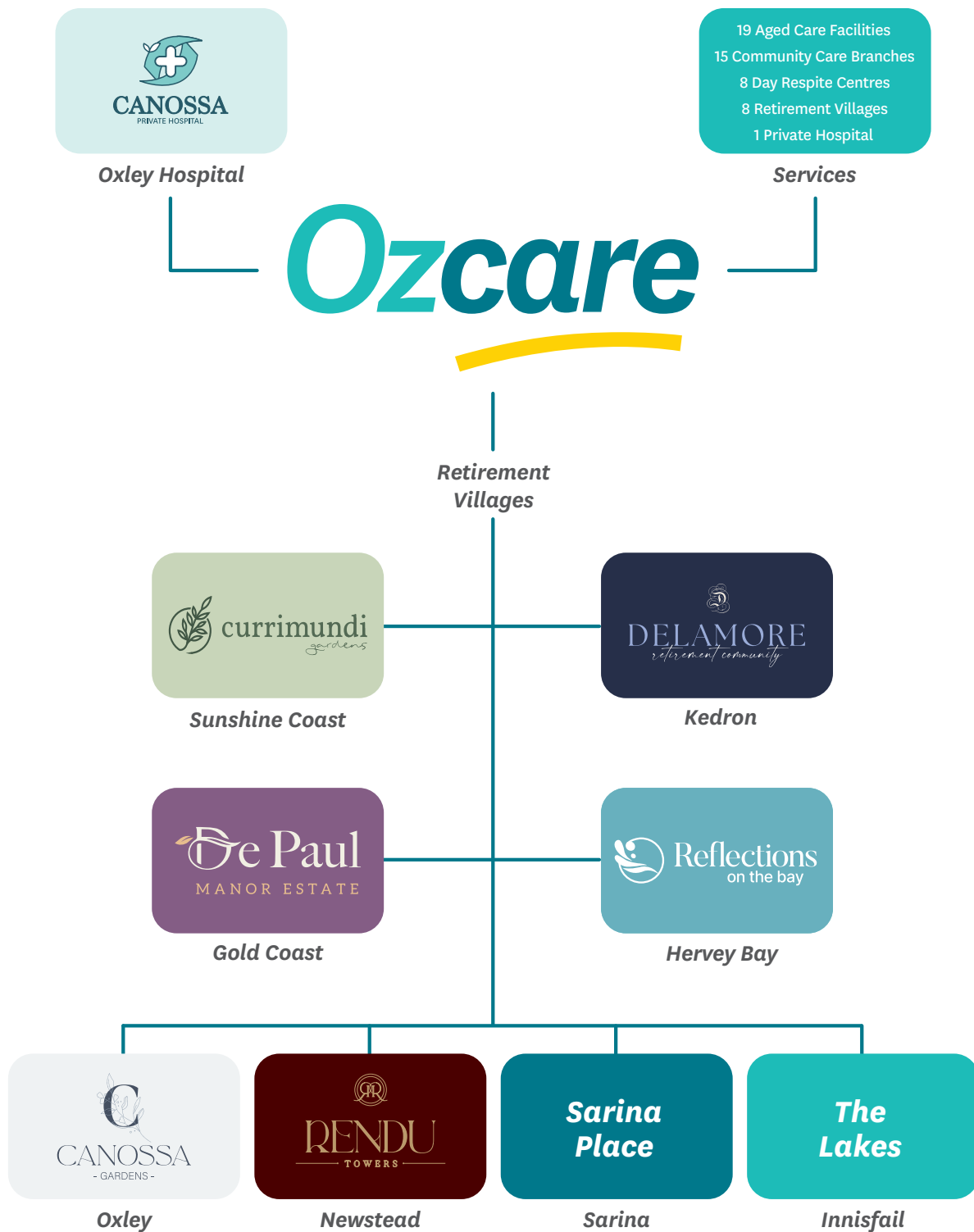


Kevin Mercer
Chief Executive Officer

How we make a difference



Brand map



South East Queensland Detail Map

Locations and hotel counts (indicated by colored pins):

- Noosa Heads: 1
- Sunshine Coast: 2
- Currumbundi: 1
- Clontarf: 1
- North Lakes: 2
- Chermside: 2
- Newstead: 1
- Brisbane: 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100
- Oxley: 1
- Shailer Park: 2
- Runaway Bay: 3
- Southport: 3
- Robina: 2
- Burleigh Heads: 3
- Warwick: 2
- Toowoomba: 1, 2, 3
- Cairns: 1

41 Currimundi

North Lakes

Chermside

Toowoomba

2

Brisbane

Runaway Bay

Southport

Gold Coast

Burleigh Heads

Port Douglas

Atherton 

Malanda 

Cairns

Innisfail

Trehonne

Townsville

Mackay

Spring

Emerald

Rockhampton

Gladstone

4 Miriam Vale

2 Bundaberg

Hervey Bay

Maryborough

Sunshine Coast

Toowoomba

Brisbane

Gold Coast

CORP0049 | Review Date: May 2026

Commitment to eliminating Modern Slavery

Modern Slavery is defined as a “situation where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom.” The Modern Slavery Act 2018 defines serious exploitation as trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage; deceptive recruiting for labour or services and the worst forms of child labour. The nature and extent of modern slavery like practices means there is a risk that it may be present in an organisation’s supply chains.

Ozcare’s mission is to support our clients to live their best lives through the provision of compassionate, professional and personalised, aged care, community and health services. Our organisational values of acting with Integrity, Respect, Empathy and Compassion are the antithesis of modern slavery. Ozcare is committed to taking steps to minimize the risk of modern slavery like practices in our supply chain. That commitment extends to maintaining membership of the Australian Catholic Anti Slavery Network (ACAN).

We commit to further develop and refine our governance practices that relate to Modern Slavery in coming years.

Our Modern Slavery governance practices

Our efforts to mitigate and action the effects of modern slavery are underpinned by our governance approach to our modern slavery framework, which includes policies, procedures and practice that is supported by targeted training. These include:

Our **Risk Management Framework**, which identified key risks to Ozcare, and outlines the risk management and mitigating strategies used to reduce the potential exposure to slavery like practices in our supply chains. This year, our risk mitigation approach included the commencement of implementation of Sedex for supply chain management and oversight.

The **Whistleblower Protection** policy which supports high standards of behaviour and conduct, and outlines how a whistleblower can disclose instances of concern, whether that be within our organization or by any of our contractors, organisations connected with Ozcare or within our supply chain.

Our **Ethical Investment** policy which outlines how we will invest ethically. The policy specifically identifies Modern Slavery risk and prohibits investment in companies or organisations that can be linked to modern slavery like practices. The policy also forbids investment in any company that has been involved in any serious inhibition of human rights whether in Australia or overseas - such as exploitation by providing wages and working conditions below that which is acceptable in Australia or any overseas nation. The policy prohibits investment in activities that damage human health or industries involved in the production of armaments.

Our **Human Rights Policy** which empowers and supports our clients to exercise their human rights, but also requires employees to take a proactive approach to prevent any form of neglect or abuse. In 2024, we will be introducing Human Rights training for staff to support this approach.

The **Purchasing Policy** which outlines how to deal with suppliers in a fair and impartial manner. The policy requires purchasing staff to seek probity advice if there are instances of concern in regards to the

relationship with a supplier. The policy requires purchasing staff to only source from reputable suppliers who demonstrate compliance with legislation and acceptable business practice.

Our **ESG Framework** - Environmental Social and Governance (ESG) Framework outlines how as an organisation we act responsibly by setting our standards high, engaging our suppliers and complying with key regulations. A key goal within our ESG framework is to target higher risk suppliers and have them complete Sedex onboarding by end of financial year 2026. Our ESG framework also outlines how we want to be responsible in our procurement activities.

The **Code of Conduct** which outlines the standards of ethical conduct and behaviour expected of our staff. The code requires staff to take reasonable steps if they believe a person is being subjected to exploitation or abuse.

Modern Slavery Training and skills development for key staff involved in Modern Slavery governance practice, including the Modern Slavery Liaison Officer, some Executives and key procurement staff. Membership and participation in the Australian Catholic Anti Slavery Network facilitates our access to resources, materials and modern slavery expertise to support our practice. The network also allows us to benefit from the learnings and initiatives taken by other members.

Criterion 1 & 2 - Business structure & operations

Structure

Ozcare is a provider of health and human services that operates in the state of Queensland. We are a not-for-profit incorporated company limited by guarantee. Our registered office is located at 66 River Terrace, Kangaroo Point, Brisbane.

Ozcare is a charitable work of the Society of St Vincent de Paul Queensland.

Operations

The services we provide include residential aged care, community based care, service provision to NDIS participants, retirement living, and a small hospital. Our operations are in the state of Queensland, and we employ in the vicinity of 4,700 people to provide those services.

Our Suppliers

Ozcare is committed to purchasing locally where we can. The significant majority of Ozcare suppliers are based in Australia, and particularly in Queensland, with only a small number of overseas suppliers engaged. We also try to employ suppliers in the communities in which we deliver services, as engaging in our local communities is important to us.

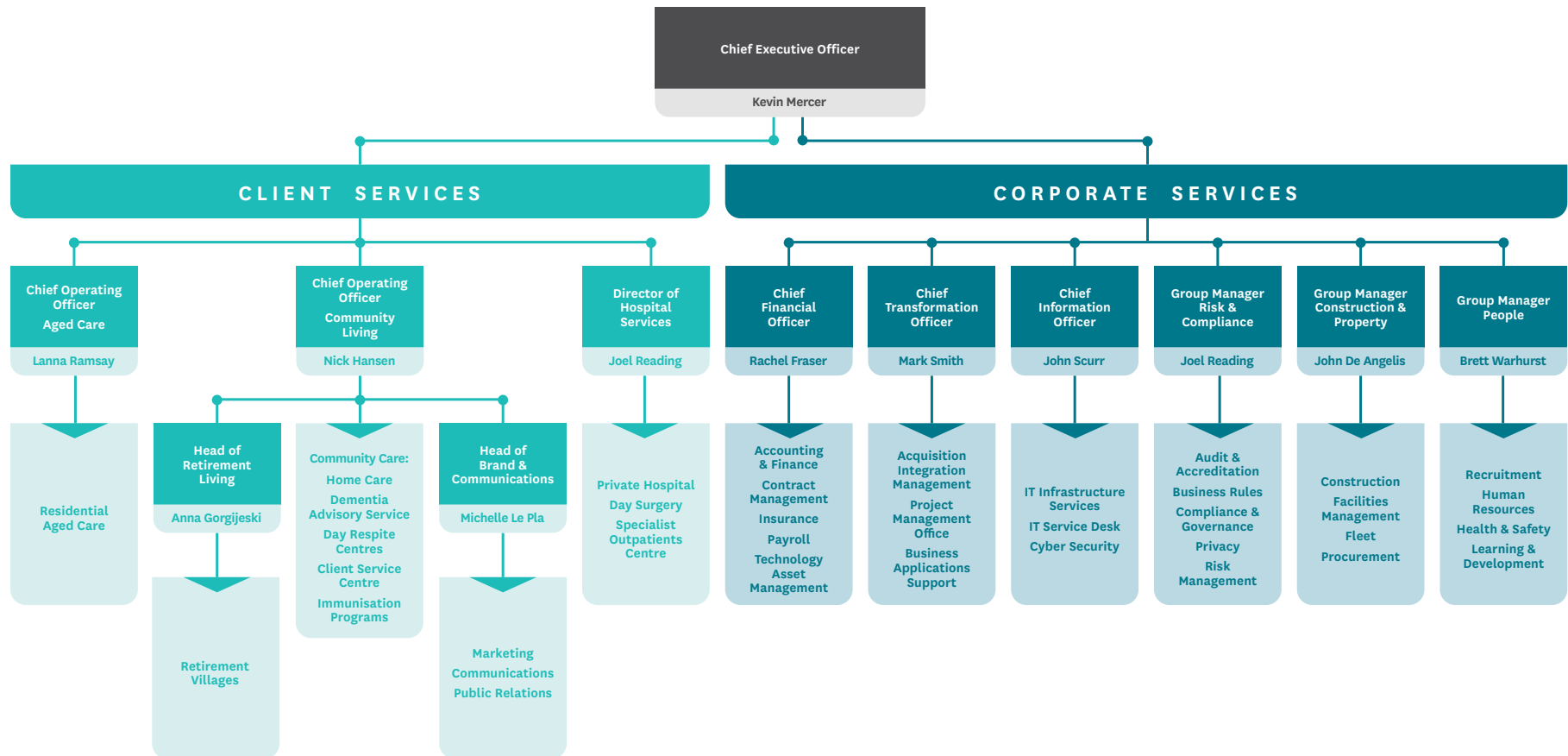
We engage our suppliers on service agreements which can vary in terms of duration of the agreement, but in the majority of instances last for two years. Typically, across the organisation we will engage in the vicinity of over 2,000 suppliers per annum.

Ozcare is a growing organisation, with a significant capital works program that will deliver the buildings and facilities we need to deliver our health and human services into the future. That growth shapes the nature of our procurement activities and supply chain. In terms of risk taxonomy, our top five major spend categories (in order) for 2025 were:

1. Building and construction
2. Labour hire / agency staff
3. Food and catering
4. Facility and property maintenance
5. Cleaning and security services

Labour hire contractors are engaged, mostly for short term nursing, allied health and in some instances for cleaning, and garden maintenance. In these instances, we have engaged companies that are Queensland based, and employ their staff under award conditions.

Organisation structure



Criterion 3 - Modern Slavery risks

Slavery, servitude, forced labour, debt bondage, human trafficking and other slavery like exploitation is a world wide issue, and Ozcare recognises that Australia and companies that operate in Australia are not immune to these issues. Some specific industries, geographical regions or nations can present a higher risk of modern slavery or exploitative practices.

In 2020, Ozcare developed a Modern Slavery Policy that guides our practice in how we will manage risks to modern slavery in our supply chain. However, to be effective, this policy needs to be supported and supplemented by other practices, and in Ozcare these are:



We anticipate that we will be reviewing our Modern Slavery Policy and associated work practices when the anticipated changes to legislation occur.

Slavery, servitude, forced labour, debt bondage, human trafficking and other slavery like exploitation is a worldwide issue, including in Australia.

For Catholic entities, modern slavery risks are defined by the ACAN Category Risk Taxonomy, a classification standard that identifies severity of actual or potential harm to people (saliency) in spend categories.

The ACAN Category Risk Taxonomy is based on sources such as:

- the Global Slavery Index
- the International Labor Organisation (ILO), including definitions of modern slavery
- the Bureau of International Labor Affairs (ILAB), U.S Department of Labor
- the Global Child Forum and UNICEF

Four key factors are also used to determine the level of risk:

- Geography: the country or location where a good is made or service is delivered
- Industry: the sector in which the making of goods or delivery of service occurred
- Commodity: the raw materials or components that comprise the goods or products
- Workforce vulnerability: such as bonded visas, temporary migrants, women or children known to be employed in specific industry sectors
- Domus 8.7: trends, cases, and risk intelligence identified through the Domus 8.7 remediation service, including grievances and remediation insights relevant to category and risk to workers.

Classification

High risk	Medium risk	Low risk
• Building and construction • Cleaning and Security • Events and event management • Facility management and property maintenance • Finance and Investment • Food and catering services • Furniture and office supplies • ICT Hardware • ICT Software and network services - offshore • Labour Hire • Linen, laundry and textile products • Medical devices and supplies • Transport, logistic and warehousing • Uniforms and PPE • Waste management services	• Advertising & Marketing • ICT Software and network services - onshore • Utilities • Fleet management, consumables and maintenance • Travel and accommodation • Print / Mail Provider	• Professional services • Financial expenses • Government and agency fees • License / membership fees
	 Note: The following categories are not in scope of the ACAN Category Risk Taxonomy • Pastoral • Payroll (excluding labour-hire and sub-contracting)	

Risk assessments

While companies can manage and be confident in their own business practices, an element of modern slavery risk can be present through a company's own supply chain. This statement sets out Ozcare's actions to identify and address the risks of modern slavery practices within our operations and supply chains.

Since the introduction of the Modern Slavery Act, Ozcare has commenced a program of work to identify and address any risks of modern slavery in our operations and supply chain. We have in the vicinity of 2,024 suppliers, but of those the top 100 suppliers constitute the very significant amount of our procurement expenditure. A significant number of suppliers are small businesses, sometimes run by a sole trader such as a tradesperson. We have assessed the risk of our top suppliers.

Our major procurement categories, expenditure data and suppliers for 2025 is as follows:

Procurement category	Expenditure	Number of suppliers
Building and construction	\$34,699,548	233
Labour hire and agency staff	\$23,426,260	34
Food and catering	\$16,307,092	123
Facility and property maintenance	\$8,502,065	605
Cleaning and security	\$5,615,167	231
Medical devices and supplies	\$4,141,632	119
Furniture and office supplies	\$3,740,261	130
Linen and laundry	\$2,643,798	27
Waste management	\$1,409,433	36

Understanding our risks - knowing what we purchase and our suppliers

As a large organisation that is growing, we recognise that our modern slavery risk profile is not static and will evolve as we grow. Our expenditure categories (as outlined above) have changed from our previous statement in terms of both total expenditure but also changes in where we are spending – some categories that have potential for modern slavery risks have seen a significant rise in the total expenditure. This is a contributor to how we will address modern slavery risk in the future – see below for more detail.

In order to understand the greater specifics of the nature of the goods and services we are procuring we have grouped the types of products we purchase. This aids in the modern slavery risk taxonomy. A number of these products are manufactured overseas but supplied by Australian domiciled companies. Some of the products are classified as being sourced from countries or industries that are at risk of modern slavery like practices, and in 2025 we introduced additional measures for suppliers in those higher risk procurement categories via the Sedex supply chain management system.

What do we buy – significant goods and services obtained by value

In 2025, we reviewed our purchasing practices and agreements to understand the nature of the products we are purchasing, in order to better inform how we could manage Modern slavery risk when implementing the Sedex system.



Building and facility management

- Furniture, fixtures and equipment
- Cleaning supplies
- Pest control
- Air-conditioning maintenance
- Waste management
- Hardware and trade supplies
- Cleaning and domestic services
- Trades services
- Security services
- Grounds and gardens maintenance
- Fire systems maintenance
- Water treatment
- Electricity
- Gas – non medical and medical
- Building maintenance services

Business services

- Advertising and promotion services
- Audit and certification services
- Various insurances
- Legal services
- Subscriptions and memberships
- Stationery supplies
- Printing services
- Recruitment services
- Consultancy, such as engineering, architects
- Training and education
- Travel and accommodation
- Document management
- IT systems and support

Aged care and hospital consumables

- Food and beverages
- Catering supplies
- Food service consumables
- Housekeeping supplies
- Linen and laundry services
- Food and nutrition supplements
- Clinical consumables
- Medication and drug supplies
- Personal hygiene products
- Medical aids
- Medical consumables and PPE
- Pathology and radiology services
- Prosthetics
- Sanitising and sterilising products
- Surgical supplies
- Dressings and wound management supplies

Assets and equipment

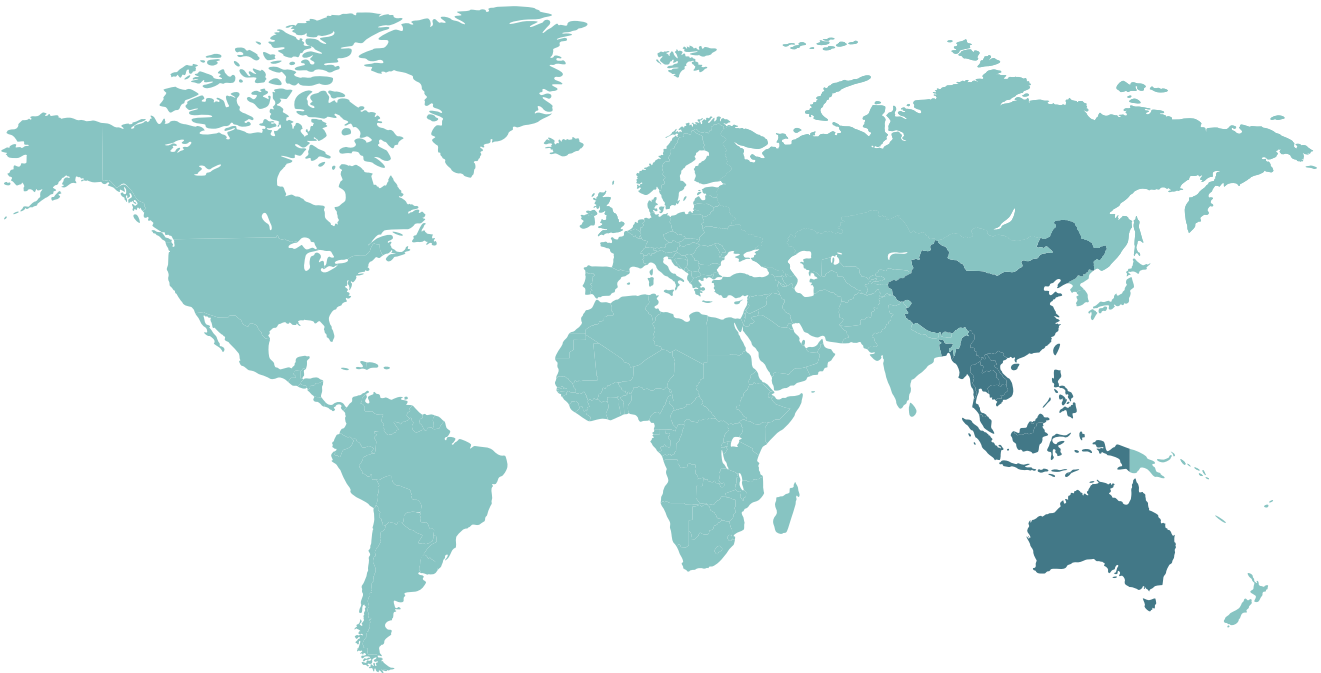
- Air-conditioning equipment
- Fleet vehicles
- Fire prevention and management systems
- Office equipment
- Biomedical equipment
- Mobility aids
- Aged care / hospital beds and mattresses
- Nurse call systems
- Client / patient record systems
- IT equipment
- Diagnostic equipment and systems
- Various equipment leases and rentals
- Biomedical equipment servicing services
- Client / patient management systems
- Construction works for major projects

Staffing, volunteers and human resource related

- Uniforms
- Temporary staff – eg nurses, admin, allied health
- Employee Assistance Scheme services
- Staff training packages and systems

Some of the products above are sourced from industries that are considered to be at risk of modern slavery like practices, and produced or manufactured within countries that are known to have instances of modern slavery like conditions. We have identified the following products as being areas that we wish to place particular emphasis upon in our management practices, and particularly as we mature our use of Sedex:

Uniforms / textiles	China, Bangladesh and Indonesia
Security services	Australia
Waste management	Australia
Labour hire / agency staff	Australia
Stationery and office supplies	China
Furniture	Australia and South-East Asia
Medical Consumables	Australia, South-East Asia and China



Risks to workers in aged care on temporary visas

Ozcare has significant spend in relation to workers in labour hire and agency staff it relies on to provide aged-care services across Queensland including in regional areas. Workers on temporary visas play an increasingly important role in the aged care sector, yet they face a range of structural and situational vulnerabilities that can elevate their exposure to modern slavery risks.

A central risk factor is dependency on the employer or labour hire provider for ongoing visa validity and income stability. This dependency can make workers reluctant to raise concerns about underpayment, excessive hours, unsafe workloads or inappropriate behaviour, particularly when they fear that speaking up may jeopardise their employment or visa status. While Pacific workers on the Pacific Australia Labour Mobility (PALM) scheme have access to a regulated mobility framework, the administrative steps involved in transferring employers can still deter workers from leaving harmful situations. Sponsored workers on other temporary visas may face even more restricted mobility, increasing their vulnerability to coercion or exploitation.

The complexity of employment arrangements in aged care also contributes to risk. Labour hire is common in the sector, and workers may be placed in facilities where day to day supervision is carried out by one organisation while their legal employer is another. This can create confusion about who is responsible for wages, conditions, pastoral care and grievance handling. Where subcontracting chains exist, accountability can become blurred, increasing the likelihood of underpayment, unlawful deductions or inconsistent oversight.

Financial vulnerability is another shared risk across both PALM and other sponsored workers. Some temporary migrants incur significant costs before arriving in Australia, including illegal or unfair recruitment and migration agent fees, travel costs or informal debts to family or community members. These financial pressures can make workers more susceptible to accepting poor conditions or remaining in unsafe roles.

Workers in both groups may also have limited knowledge of Australian workplace rights, complaint pathways and support services. Language barriers, unfamiliarity with local systems and limited digital literacy can restrict access to information and increase reliance on employers or labour hire providers. This is particularly relevant in aged care, where the work is physically and emotionally demanding and where workers may be pressured to accept overtime, split shifts, unpaid work, tasks outside their job description or extended periods without work whilst still having to send money home and pay daily living expenses.

Accommodation related risks can also arise, especially where housing is arranged or controlled by the employer or labour hire provider. Overcrowding, unsafe conditions, excessive rent and other deductions or restrictions on movement can create environments where workers feel unable to leave or seek alternative employment. Sponsored workers may also experience housing insecurity or dependence on employer provided accommodation during initial settlement.

Social isolation is a significant risk factor for both groups. Many temporary visa holders arrive without established networks and may be placed in regional or suburban aged care facilities with limited access to community support. Isolation can reduce help seeking behaviour and increase vulnerability to coercion, particularly when combined with dependency on the employer for transport, accommodation or social connection.

Overall, sponsored temporary visa holders in aged care face elevated modern slavery risks that require proactive identification, monitoring and mitigation.

Criterion 4 – Steps taken

Our employment practices

Our staff are employed under our own enterprise agreement, which is periodically revised based on negotiations with employees and their representative unions. Our direct employment of our staff lowers modern slavery risks within our own organisation, so our future focus will be on organisations that we enter into supply agreements with and our external contractors.

All of our employees are free to associate with and be represented by a union. Union staff periodically attend our sites to meet with their members. All staff employed by Ozcare enjoy terms and conditions above and beyond those required by the relevant industrial award obligations.

Training of employees

Training and awareness is a key control in addressing the risk of modern slavery and human trafficking. We recognise the need to build the modern slavery risk understanding of our employees, particularly our staff in procurement roles. Key management and individuals involved in the procurement process have been provided with training in our modern slavery approach and associated business practices.

All Ozcare employees are required to be familiar with and observe organisational policy and procedures related to their role. Our modern slavery policy and procedures are accessible by all Ozcare staff. All new staff must familiarise themselves with our Code of Conduct upon commencement, which advises how to raise any concerns they might have in regards to our operations, which includes any modern slavery risks.

In 2022, we introduced the Modern Slavery training packages into our on-line staff training system. It is a requirement for staff in the procurement functions to complete that training. In 2025, Human Rights training was introduced into our staff training package suite for relevant staff.

Reporting of concerns

Our modern slavery organisational procedure includes information on who employees can go to if they are concerned about modern slavery risks in our supply chain. It also outlines who they can go to if they want any advice in regards to modern slavery risks.

Alternatively, our whistleblower procedure provides an alternative pathway for the confidential notification of any concerns by employees and key stakeholders.

While we have not had any concerns raised directly with us, Ozcare did participate in meetings with one of our suppliers via our participation in the Australian Catholic Anti Slavery Network.

Remediation for Modern Slavery

Ozcare is a founding member of Domus 8.7. Domus 8.7 was established as an agency of the Catholic Archdiocese of Sydney in 2020 as a key element of the ACAN Modern Slavery Risk Management Program. This collaborative approach to remediation is aligned with the Modern Slavery Act and Catholic Social Teaching which are centered on the needs, wellbeing and empowerment of people impacted.

Domus 8.7 provides:

- resources that enable us to listen to workers (grievance channel)
- a 24/7 careline for workers on our sites, staffed by professional counselors
- direct support to people impacted by modern slavery
- guidance and technical assistance to prevent, identify and remediate modern slavery
- a documented process to assess if an organisation has caused, contributed or is directly linked to modern slavery and modern slavery indicators

Domus 8.7 empowers people impacted by modern slavery to have choice and control over what forms of remediation are meaningful to them and to engage safely with business/supply chain actors. Supports may include:

- modern slavery indicator assessment
- needs assessment, case coordination, response and remediation planning
- referrals to community, social services, unions
- transport, accommodation, financial and food support
- legal support, referrals, accompaniment and advocacy
- job training, retraining and redeployment
- accompaniment and advocacy to engage with government and law enforcement agencies
- opportunities to contribute lived expertise to improve modern slavery responses

The Domus 8.7 Advisory Committee Members also include a person with lived expertise, Mr Moe Turaga.

Domus 8.7 is a registered charity with the Australian Charities and Not-for profits Commission (ACNC) and is an endorsed Public Benevolent Institution with Deductible Gift Recipient (DGR) status. ABN 244 72497189



Actions to safeguard our temporary migrant workforce case study

We approach the recruitment and support of temporary migrant workers through a safeguarding lens that affirms their inherent dignity and value. Guided by our organisational values of integrity, respect, empathy and compassion, we are committed to ensuring that every sponsored worker is welcomed, protected and supported as they adapt to a new country, community and workplace. At Ozcare this means actively creating conditions in which temporary migrant workers feel safe, informed, connected and empowered to thrive.

Ethical recruitment and transparency

- o Ozcare partners with reputable recruitment and migration agents - no recruitment fees are charged to candidates
- o Prospective sponsored staff are provided clear communication of role expectations, pay, visa conditions and employment terms prior to relocation

Visa coordination and compliance oversight

- o Ozcare's International Workforce team coordinates closely with migration agents and candidates throughout the visa process
- o All arrangements comply with Australian workplace laws and visa requirements, with appropriate internal approvals and oversight

Equivalent employment terms and conditions

- o Sponsored workers are employed on the same employment terms and conditions as local employees in equivalent roles, including pay and access to employment benefits
- o Sponsored workers also have equal access to development opportunities, including training, promotion and career progression opportunities

Pre-arrival preparation

- o Guidance is provided on relocation, role expectations and living in Australia to support informed decision-making

Relocation, accommodation and settlement support

- o Relocation support and initial accommodation provided to reduce financial pressure on arrival. This includes:
 - Airport pickup and transport to our service location
 - Welcome email with guidance on setting up essentials such as a phone SIM card, bank account, health care related support etc.
 - Location specific transport arrangement
 - Free furnished accommodation support for up to 12 weeks plus assistance in finding permanent accommodation
 - Relocation cost reimbursement up to \$2,000 for eligible relocation expenses
 - Ozcare provides assistance with setting up essential services (e.g. bank accounts, tax file number, mobile services)

Arrival and community integration

- o Ozcare's local service management teams support workplace orientation and help introduce workers to the local community on arrival, including any specific cultural or expatriate nationality groups
- o This helps reduce isolation and supports social connection and settlement in a new environment

Ongoing support and safeguarding

- o Ozcare's local service management teams act as the first point of contact, supported by the International Workforce team through regular follow-up and check-ins
- o Sponsored workers also have access to the same employee support services available to local staff, including Ozcare's employee support hotline / employee assistance program

Support for family reunion and long-term settlement

Where visa pathways allow, Ozcare is supportive of workers' decisions to reunite with immediate family and provides supporting documentation where appropriate

Our supply chain and stakeholders

Ozcare's service provision requires us to obtain supplies of goods and services from a range of suppliers and stakeholders, from very small sole operators to large and complex organisations. Accordingly, there are varying levels of understanding and practices with some suppliers having just begun their journey, and others having the benefit of mature supply chain management processes and sophisticated modern slavery identification practices in place.

We know that modern slavery like behaviours are unlikely to thrive where core human rights are respected. Australia has an international reputation for upholding such rights – and when measured by dollar value, the vast majority of our supplier payments are made to suppliers that are based in Australia and particularly in Queensland. Aside from valuing our ability to give our business to local suppliers in our own community, it is a good risk based decision to do so knowing that doing so reduces the possibility of modern slavery in our supply chain. However, we do source products that have been sourced from overseas, and indeed from geographical areas that present modern slavery like concerns.

Ozcare undertakes due diligence assessment when engaging suppliers. In order to understand our modern slavery risk through our supply chain, we have written to our suppliers to gauge their levels of understanding of modern slavery – we also asked them what specific actions they may be taking to address modern slavery risks in their own supply chain. We specifically asked our suppliers to advise us of the following :

- The nature of their business, and where they operate
- Whether they would agree to comply with our Modern Slavery Statement and intent
- Who are their subcontractors and how are they managing subcontractors
- What policies or practices they have to address modern slavery, human rights, ethical trading or whistleblowing
- How often they review their supply chain, and what steps they may have taken to mitigate the risk of modern slavery in their supply chain
- Whether they use seasonal or contract workers in their own workforce or supply chain
- Has there been any concerns raised in regards to modern slavery in their business or supply chain

The information obtained has allowed Ozcare to be better informed about our suppliers and take a risk based approach to our relationship considering factors such as the industry they are in and the geographical locations of their own supply chains.

Implementation of Sedex

In 2023, we implemented the Sedex supply chain management system in order to improve our supply chain risk assessment processes. Sedex is a data exchange platform, designed to enhance data sharing and minimise the burden of risk assessments and risk validation, by mutually recognising the results produced for specific shared suppliers, produced by other members' efforts, and vice-versa.

When introducing the system, we have targeted companies that are engaged for significant amounts of our expenditure, or are within industries or have supply chains located in countries that are considered to be higher risk. We intend to gradually increase the use of Sedex as existing service agreements expire and new ones are created.

ACAN supplier engagement

The ACAN Program also provides Ozcare with supplier engagement support and data, enabling a systematic and comprehensive supply chain risk assessment. In 2025 the ACAN Modern Slavery Risk Management Program launched a new purpose-built data management platform - ROTA. ROTA centralises

the ACAN Risk Management Program Framework and facilitates supplier performance evaluation and engagement through:

1. Evaluation of the modern slavery risk within operations and supply chains, using the ACAN Risk Taxonomy
2. ACAN Supplier Survey to identify supplier revenue, number of employees, countries of origin for goods sourced overseas, workforce contractual arrangements and SEDEX membership status.
3. Supplier education on modern slavery and risk management in key areas: cleaning, building and construction, procurement of labour, labour hire and services, sourcing goods from overseas, grievance mechanisms and remediation
4. Onboarding suppliers to SEDEX requires a business address, contact details and goods or services provided
5. SEDEX Self-Assessment Questionnaire (SAQ) helps suppliers to evaluate their practices against established standards and identify areas for improvement
6. Desktop review to identify key actions required from suppliers
7. Enhanced supplier screening using Know Your Client (KYC) intelligence software
8. Corporate Social Compliance Audits that provide a point in time, objective and independent verification process of supplier alignment with local laws and worker wellbeing standards
9. Domus 8.7 Index modern slavery statement assessment on selected suppliers in high-risk categories
10. ACAN Prequalified Supplier Directory

Criterion 5 - Assessing the effectiveness of our actions

Our survey of suppliers' business practices and steps taken to identify and mitigate potential modern slavery practices in their own supply chains resulted in some further discussions with a small number of suppliers due to their responses. We believe that process in itself has resulted in changing attitudes and practices amongst our suppliers in regards to modern slavery.

All of our suppliers are subject to an annual review of their performance, part of which examines their conduct and behaviour. Our supplier code of conduct establishes an expectation for our suppliers to conduct their business in a responsible manner, and also accept the possibility of an audit of their operations should Ozcare become aware of any potential modern slavery risks in their organisation or supply chain.

The level of modern slavery risk is influenced by factors such as vulnerable populations, product and service category, industry and geographic location. Accordingly, we have tailored our risk processes to ensure that we are focusing our efforts on those areas that present an elevated risk of exposure. In 2021, we assessed that of all of the products and services we procure, those within the categories of textiles, office products and fresh food present an elevated risk of modern slavery. In our 2023 review, we have identified that contract waste management, contract temporary staff, furniture supply and medical consumables also may present risk.

The risk assessments of our major suppliers have indicated a maturing level of modern slavery awareness amongst these suppliers. Some have provided evidence of steps they have taken to remove risks in their own supply chain, including audits of their own operations and those of their suppliers.

We do believe that we can further improve on these processes. In 2023, we implemented Sedex which we gives us greater confidence in our ability to oversight our suppliers' actions to address modern slavery risk in their own organisation and supply chains, thus giving us greater confidence in assessing the efficacy of our actions. Please refer to Criterion 7 for further information on the steps we will be taking in the future to improve the efficacy of our processes.

In 2022, we implemented modern slavery training for key staff to raise awareness of modern slavery risks in our procurement functions.

Ozcare is an organisation with service outlets throughout Queensland - each of those outlets can enter into supply agreements with suppliers, meaning that our decentralised nature could present a heightened risk of exposure to modern slavery through our supply chain. In 2023, we centralised some supply agreements on a whole-of- organisation level, which will facilitate closer monitoring of modern slavery risks. Some of those suppliers have been required to participate in the Sedex assessment system. In 2024, we were able to further address those suppliers participation in Sedex. We will be aiming at establishing supply agreements in industries that have been known to have modern slavery risks - ie construction, waste disposal, security services, cleaning and textiles / uniform supply (see criterion 6 for more information).

Ozcare is a member of the Australian Catholic Anti Slavery Network, a body that has considerable expertise in modern slavery risk management and advice. ACAN can provide advice and support to their members in developing and improving a modern slavery management framework - this statement, including our actions taken has been reviewed by ACAN.

Criterion 6 – Internal consultation

Ozcare does not control other entities.

Criterion 7 – Other information

No relevant information.



Ozcare's wide range of services to support Queenslanders are made possible by funding from a diverse range of programs from the Australian and Queensland Governments.

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Ozcare is a quality certified organisation and has met the requirements of the International Standards Organisation (ISO 9001:2015)

ABN 58 072 422 925



TO GROW COMMUNITIES WHERE
BEST LIVES ARE LIVED

Modern Slavery Statement 2025

sccqld.com.au



**southern
cross care**
Valuing and Respecting Human Life



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2078 Logan Road, Upper Mt Gravatt Qld, 4122
ABN: 65 104 033 471

For enquiries relating to this document, contact our Modern Slavery Liaison Officer (MSLO), Aiden Ashby:
Tel: 07 3340 3200
Email: procurement@sccqld.com.au

www.sccqld.com.au

APPROVAL AND SIGNATURE

This Modern Slavery Statement was approved on June 25, 2026, by the principle governing body of Southern Cross Care (QLD) Ltd as defined by the Modern Slavery Act 2018 (Cth) ("the Act")

This Modern Slavery Statement is signed by a responsible member of Southern Cross Care (QLD) Ltd as defined by the Act.



Francis Price
Chair



INTRODUCTION

Southern Cross Care (QLD) Ltd [SCCQ] takes a firm stand against the persisting issue of modern slavery. As a leading organisation committed to enhancing the lives of SCCQ's residents, clients and greater community, SCCQ recognise the requirement of addressing the complex challenges posed by modern slavery in today's interconnected world.

This Modern Slavery Statement serves as a testament to SCCQ's unwavering dedication to eradicating all forms of exploitation, forced labour, and human trafficking from not only SCCQ's own operations but also from the broader supply chains SCCQ engages with. With a legacy of caring deeply for the well-being of individuals, SCCQ believe that upholding human rights and ethical practices is not only

SCCQ's moral imperative but also integral to SCCQ's identity as a Catholic organisation.

In this statement, SCCQ will outline the strategies, policies, and initiatives aimed at preventing and mitigating the risk of modern slavery within SCCQ's operations and supply chains. By transparently sharing SCCQ's approach, progress, and ongoing challenges, SCCQ aims to foster accountability, engage stakeholders, and inspire collective action in the fight against modern slavery.

This statement has been developed with assistance of, and in consultation with, the Australian Catholic Anti-Slavery Network and SCCQ's partner Southern Cross Care organisations.

Criterion 1 – About Southern Cross Care (QLD) Ltd

Southern Cross Care Queensland (SCCQ) is a not-for-profit organisation with a Catholic ethos, established by the Knights of the Southern Cross over 40 years ago. The Knights saw a need to provide compassionate care and inclusive service to some of the most vulnerable, the ageing population, in the community.

Since then, SCCQ has grown to employ over 1,800 staff caring for and supporting more than 3,000 people across 17 residential aged care homes, 8 retirement villages, and home care clients across Queensland and regional New South Wales and Victoria. SCCQ is passionate about growing communities where best lives are lived and serving the needs of our residents and clients with compassion and care.

From 13 June 2025, Southern Cross Care Broken Hill (SCCBH) officially joined Southern Cross Care Queensland (SCCQ). This saw an increase of 261 beds and 124 New suppliers when we acquired the Broken Hill and Mildura Sites. It marks an important milestone in our journey as we extend our commitment to compassionate, person-centred aged care services beyond Queensland into regional New South Wales and Victoria.

Criterion 2 – SCCQ Structure, Operations and Supply Chains

With a Support Centre located in Upper Mt Gravatt, Queensland, SCCQ is an Australian public company registered with the Australian Not-for-profits Commission.

SCCQ is governed by a Board of 9 members with delegation given to the company CEO and carried out through an Executive Leadership Team, SCCQ has a combined annual revenue of \$172.2M, and directly employs a workforce of over 1,800 individuals, spanning diverse roles including full-time, part-time, and casual positions. Additionally, a supplementary group of volunteers also contribute their efforts across various facets of SCCQ's operations. To effectively address the requirements of SCCQ's residents and clients, SCCQ engages the services of 1791 active suppliers spanning a wide array of sectors encompassing facilities management, medical supplies, PPE, professional services, allied health, information technology, building and construction, maintenance, handyman services, and domestic assistance.

SCCQ remains steadfast in its commitment to utilise its market presence and influence to raise awareness within industries and communities about the perils of contemporary slavery.

SCCQ Procurement team

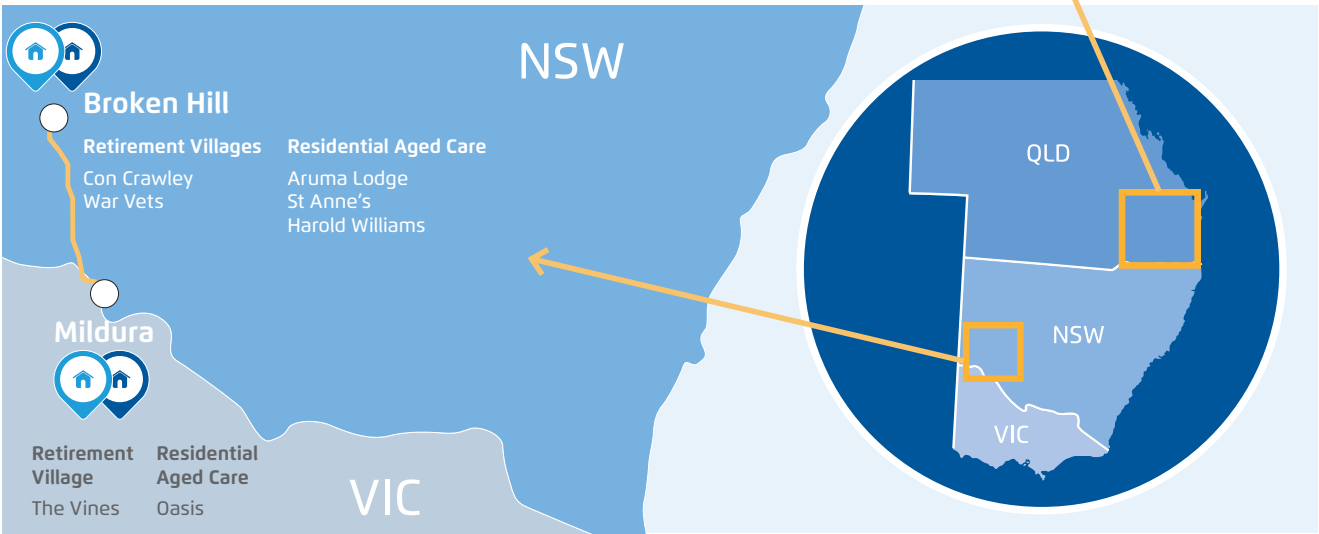
The SCCQ Procurement Team are responsible for the assessment and engagement of all suppliers within the SCCQ Operations and Supply Chains, from initial setup to periodic surveys and questionnaires. This team will also respond to all supplier feedback, questions and concerns related to Modern Slavery.

ELT and the Board

All Modern Slavery initiatives will be reported to the Board and Governance Risk and Finance Committee via the SCCQ ELT, specifically the CFO or appropriate delegate.

SCC Locations in Queensland, New South Wales and Victoria

- 17 Residential Care Homes
- 8 Retirement Estates
- 5 Home Care Regions



- Residential Aged Care
- Retirement Villages
- Community Home Care Services
- Support Centre

Criterion 3 – Modern Slavery Risks

Risk Assessment

For Catholic entities, modern slavery risks are defined by the ACAN Category Risk Taxonomy, a classification standard that identifies the severity of actual or potential harm to people (saliency) in spend categories.

The ACAN Category Risk Taxonomy is based on sources such as:

- the Global Slavery Index
- the International Labor Organisation (ILO), including definitions of modern slavery
- the Bureau of International Labor Affairs (ILAB), U.S Department of Labor
- the Global Child Forum and UNICEF

Five key factors are also used to determine the level of risk:

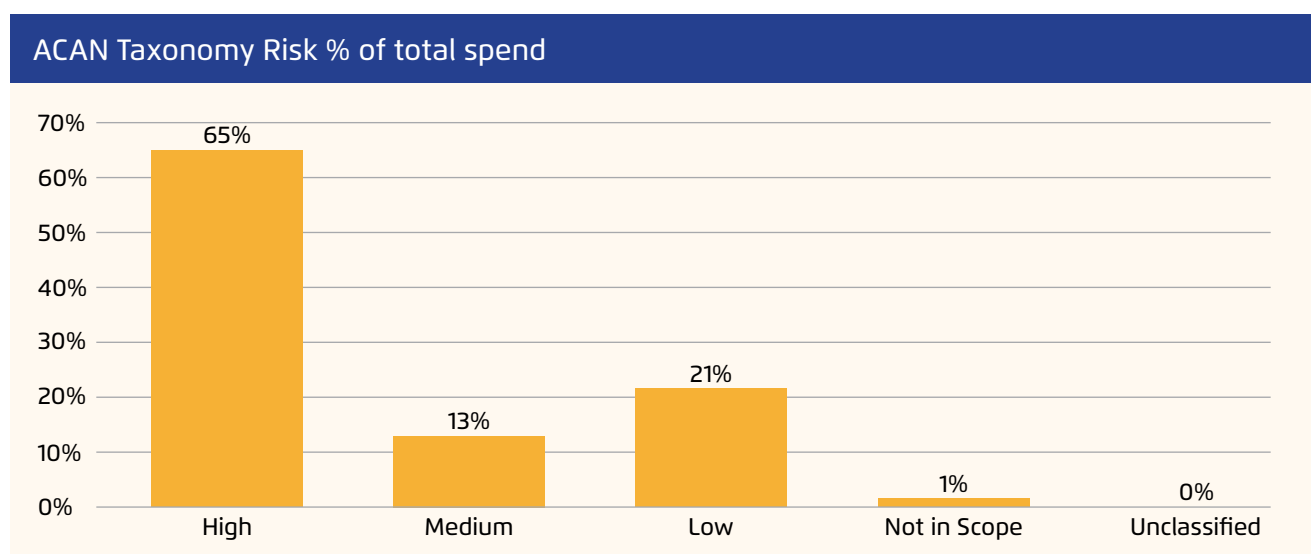
1. **Geography:** the country or location where a good is made or service is delivered
2. **Industry:** the sector in which the making of goods or delivery of service occurred
3. **Commodity:** the raw materials or components that comprise the goods or products
4. **Workforce vulnerability:** such as bonded visas, temporary migrants, women or children known to be employed in specific industry sectors
5. **Domus 8.7:** trends, cases, and risk intelligence identified through the Domus 8.7 remediation service, including grievances and remediation insights relevant to category and risk to workers.

Classification – High Risk		
Building and construction	Cleaning and Security	Events and event management
Facility management and property maintenance	Finance and Investment	Food and catering services
Furniture and office supplies	ICT Hardware	ICT Software and network services – offshore
Labour Hire	Linen, laundry and textile products	Medical devices and supplies
Transport, logistic and warehousing		
Classification – Medium Risk		
Advertising & Marketing	ICT Software and network services – onshore	Utilities
Fleet management, consumables and maintenance	Travel and accommodation	Print/Mail Provider
Classification – Low Risk		
Professional services	Financial expenses	Government and agency fees
License/membership fees		

Note: The following categories are Not in Scope of the ACAN Category Risk Taxonomy, Pastoral, Payroll (excluding labour-hire and sub-contracting).

The below data tables from SCCQ's Baseline Data Set and based on ACAN's Risk Taxonomy, clearly outline where SCCQ can focus activities around high risk suppliers.

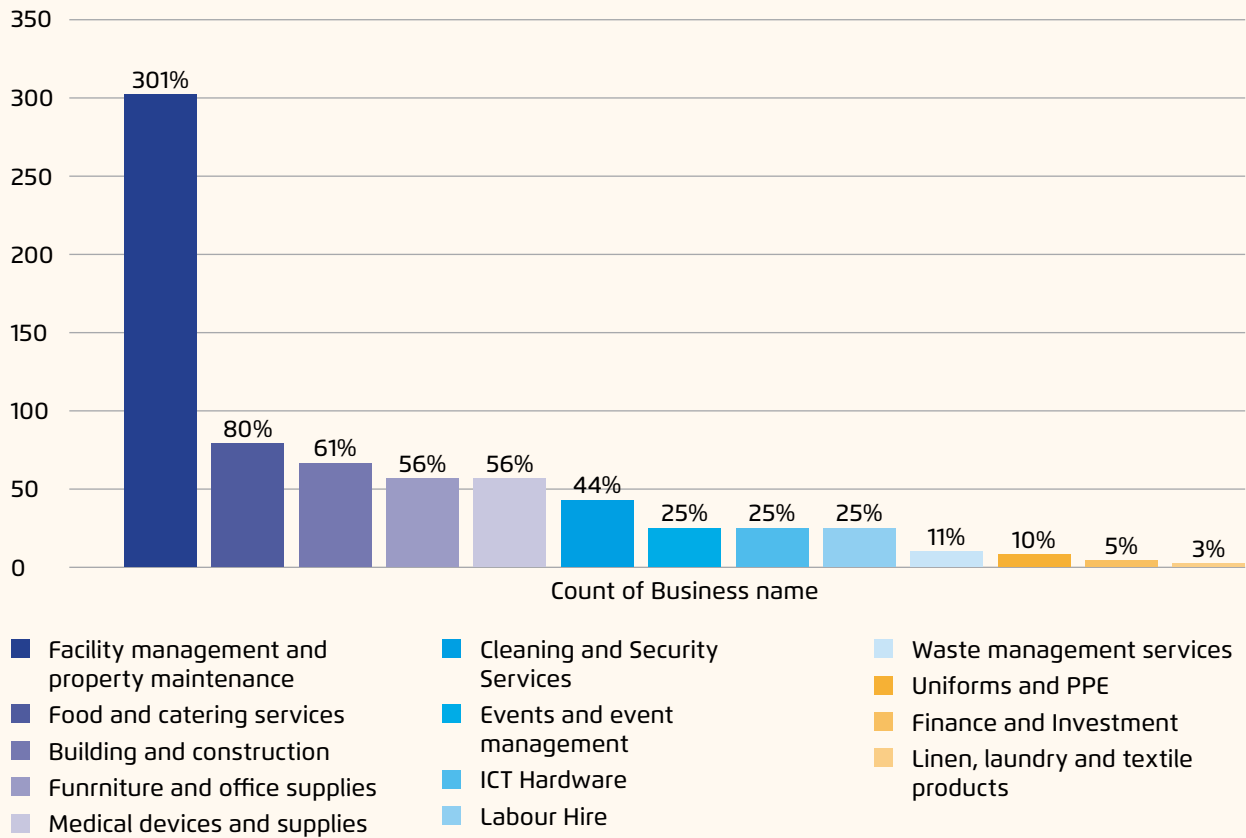
ACAN Taxonomy Risk	% of total spend
High	65%
Medium	13%
Low	21%
Not in Scope	1%
Unclassified	0%



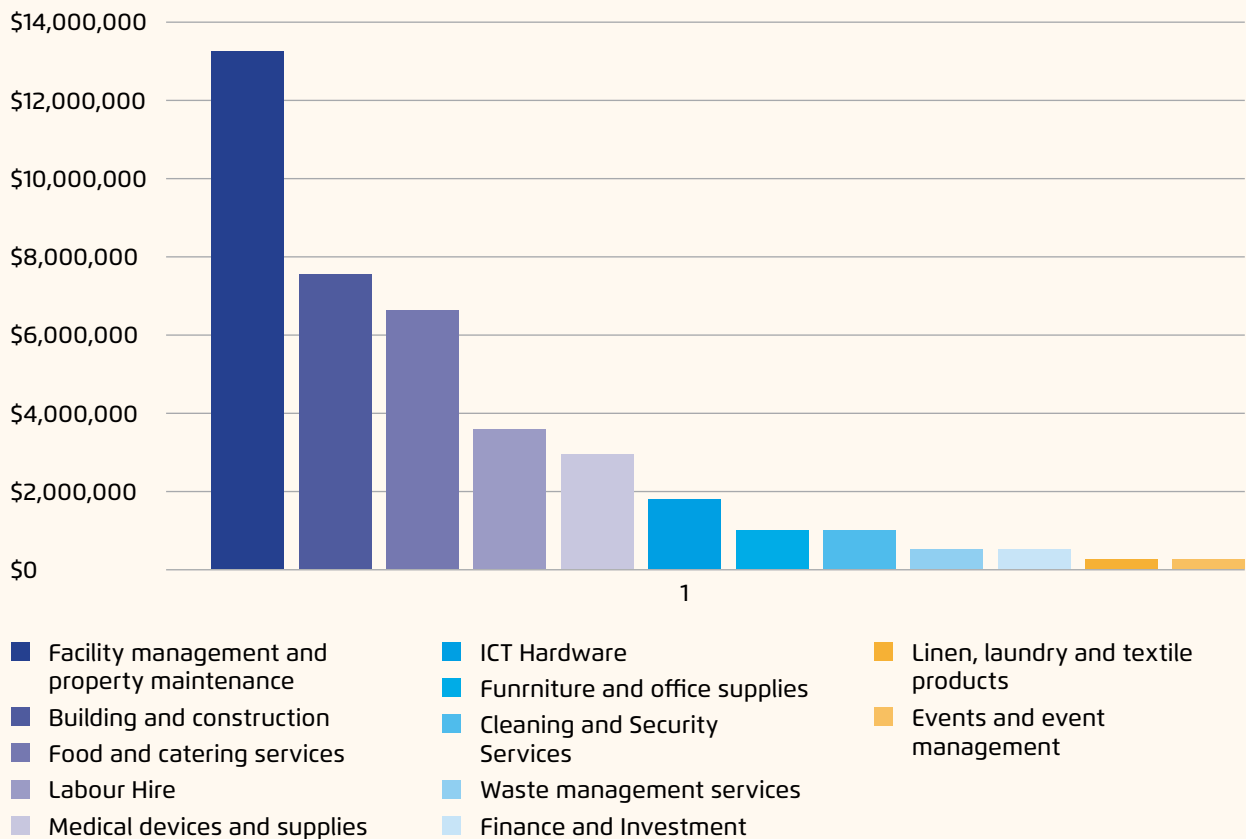
ACAN Taxonomy Category – Entity	Count of Business name
Facility management and property maintenance	301
Food and catering services	80
Building and construction	61
Furniture and office supplies	56
Medical devices and supplies	56
Cleaning and Security Services	44
Events and event management	25
ICT Hardware	25
Labour Hire	25
Waste management services	11
Uniforms and PPE	10
Finance and Investment	5
Linen, laundry and textile products	3

ACAN Taxonomy Category – Entity	Sum of Total Spend - 2025
Facility management and property maintenance	\$13,200,075
Building and construction	\$7,662,137
Food and catering services	\$6,644,808
Labour Hire	\$3,711,246
Medical devices and supplies	\$3,090,434
ICT Hardware	\$1,924,873
Furniture and office supplies	\$1,049,512
Cleaning and Security Services	\$1,044,970
Waste management services	\$694,916
Finance and Investment	\$574,686
Linen, laundry and textile products	\$239,736
Events and event management	\$198,306

ACAN Taxonomy Category – Entity



Sum of Entity Total Spend – 2025 by ACAN Taxonomy Category





Criterion 4 – Actions Taken to Assess and Address Modern Slavery Risks

In 2025, a number of initiatives were undertaken to assist SCCQ in addressing Modern Slavery risks including the following actions:

a. Training – SCCQ Committed to the roll out of online Modern Slavery training to staff utilising SCCQ’s Purchase to Pay system (Basware)

Commitment to the rollout of internal Modern Slavery training. During the 2025 reporting period SCCQ utilised ACAN’s Modern Slavery 101 video training modules and embedded them into its internal Learning Management System. This training was then rolled out to 168 staff who were identified by job role and split into High, Medium or Low risk dependent on their interaction levels with the supply chain. To further embed staff knowledge of Modern Slavery this training is being embedded into relevant staffs annual training. 120 additional staff completed training.

Modern Slavery 101 eLearning	Completed	Incomplete
High	77%	23%
Mid	76%	24%
Low	72%	28%
Grand Total	75%	25%

b. Survey of Supply Chain

Following the acquisition of SCCBH, we are continuing to review the top 80% by spend of its supply network across SCCQ inclusive of the new suppliers that have been onboarded through the acquisition process to understand how many of our existing network utilised Sedex (a Modern Slavery pre-qualification membership) and how many were active across multiple ACAN members.

c. Stakeholder Engagement

SCCQ Procurement are proactively engaging with the business at the commencement of activities to understand any potential Modern

Slavery implications enabling Procurement staff to have educational conversations about modern slavery risk. This has led to an increase in awareness in staff, especially those buying direct from International vendors outside of our designated supply channels.

d. Laudato Si Management Committee

Procurement has attended Laudato Si meetings and assisted with formulation of activities that promote both Laudato Si and modern day slavery. The Laudato Si’ Committee will be launching SCCQ’s first Laudato Si’ Action Plan in 2026 with a focus to respond to the ‘cry of the poor’ and the ‘cry of the earth’. Catholic social teaching (CST) emphasises the inherent dignity of every human person and the responsibility of society to promote the common good for all people. Therefore, an emphasis is given to mitigate and eliminate modern slavery risk in procurement. The procurement policy also provides preference for First Nations providers and tenders are sought via Fair Supply.

e. Supplier Process

Any associated providers of services to in home, aged care or Community clients are required to be registered on the government portal in line with the changes to the Aged Care Act introduced November 2025.

In response to the new aged care requirements, we have modified our new supplier onboarding process to identify which of our suppliers are associated providers. Associated Providers enter into agreements that reflect the funded aged care services that they perform, and are provided with SCCQ’s Associated Provider handbook and guidance. All Associated Providers are recorded in the Govt Associated Provider Portal.

In addition to the above, SCCQ’s New Supplier Process continues to evolve and become more robust, with supplier questionnaires,

surveys and welcome emails, all enabling increased oversight of our supply chains. With SCCQ's new Supplier Base Management software (ScanMarket) SCCQ are now able to electronically store all relevant supplier information and documentation, including a suppliers Modern Slavery Statement and or policy if they have one. Further SCCQ can utilise self-written questionnaires to assess a supplier prior to the onboarding and send out various questionnaires, surveys and other materials to already embedded suppliers. To date SCCQ is asking for completion of a new supplier questionnaire, which includes various Modern Slavery questions and sending a "Welcome" email which contains a statement affirming SCCQ's stance on Modern Slavery and details of the dedicated Modern Slavery email address for any potential grievances. Future plans include additional questions within the onboarding around SEDEX membership and potential willingness to join SEDEX.

f. ACAN Supplier Engagement

The ACAN Program provides supplier engagement support and data, enabling a systematic and comprehensive supply chain risk assessment. In 2025 the ACAN Modern Slavery Risk Management Program launched a new purpose-built data management platform - ROTA. ROTA centralises the ACAN Risk Management Program framework and facilitates supplier performance evaluation and engagement.

1. **Evaluation of the modern slavery risk** within operations and supply chains, using the ACAN Risk Taxonomy
2. **ACAN Supplier Survey** to identify supplier revenue, number of employees, countries of origin for goods sourced overseas, workforce contractual arrangements and Sedex membership status.
3. **Supplier education** on modern slavery and risk management in key areas: cleaning, building and construction, procurement

of labour, labour hire and services, sourcing goods from overseas, grievance mechanisms and remediation

4. **Onboarding suppliers to Sedex** requires a business address, contact details and goods or services provided
5. **Sedex Self-Assessment Questionnaire** (SAQ) helps suppliers to evaluate their practices against established standards and identify areas for improvement
6. **Desktop review** to identify key actions required from suppliers
7. **Enhance supplier screening** using Know Your Client (KYC) intelligence software
8. **Corporate Social Compliance Audits** provide a point in time, objective and independent verification process of supplier alignment with local laws and worker wellbeing standards
9. **Domus 8.7 Index** modern slavery statement assessment on selected suppliers in high-risk categories
10. **ACAN Prequalified Supplier Directory** – a list of preferred suppliers accessible to Catholic organisations

g. Remediation

SCCQ is committed to providing appropriate remedy to people impacted by modern slavery, including provision for and actions to address harms to people and to address future risks if found to have caused or contributed to modern slavery. Whilst no cases of Modern Slavery have been detected within SCCQ's operations or Supply Chains, SCCQ understand the complexity and specialist resources required in order to ensure the best outcomes for those impacted and therefore plan to integrate the existing grievance and remediation response with Domus 8.7, which was established in 2022, to provide remedy to people impacted by modern slavery.



Domus 8.7

SCCQ is a founding member of Domus 8.7. Domus 8.7 was established as an agency of the Catholic Archdiocese of Sydney in 2020 as a key element of the ACAN Modern Slavery Risk Management Program. This collaborative approach to remediation is aligned with the Modern Slavery Act and Catholic Social Teaching which are centred on the needs, wellbeing and empowerment of people impacted.

Domus 8.7 provides Southern Cross Care Queensland:

- resources that enable us to listen to workers (grievance channel)
- a 24/7 careline for workers on our sites, staffed by professional counsellors
- direct support to people impacted by modern slavery
- guidance and technical assistance to prevent, identify and remediate modern slavery
- a documented process to assess if an organisation has caused, contributed or is directly linked to modern slavery and modern slavery indicators

Domus 8.7 empowers people impacted by modern slavery to have choice and control over what forms of remediation are meaningful to them and to engage safely with business/supply chain actors. Supports may include:

- modern slavery indicator assessment
- needs assessment, case coordination, response and remediation planning
- referrals to community, social services, unions
- transport, accommodation, financial and food support
- legal support, referrals, accompaniment and advocacy
- job training, retraining and redeployment
- accompaniment and advocacy to engage with government and law enforcement agencies
- opportunities to contribute lived expertise to improve modern slavery responses

The Domus 8.7 Advisory Committee Members also include a person with lived expertise, Mr Moe Turaga. Domus 8.7 is a registered charity with the Australian Charities and Not-for profits Commission (ACNC) and is an endorsed Public Benevolent Institution with Deductible Gift Recipient (DGR) status. ABN 244 72497189.

Criterion 5 – Assessing the effectiveness of SCCQ’s Modern Slavery Actions

Continuous improvement

Collaboration is at the heart of accelerating progress. This includes opportunities to comparatively measure social, environmental and governance (business ethics) risks and actions with peers in our network.

In 2025, the ACAN Program adopted a globally recognised risk measurement system through SEDEX. This aligns reporting entities with a methodology that combines global data about risks in different countries and industries with site-specific information from the SEDEX platform. SEDEX regularly updates assessment methodology to ensure it is aligned with new and emerging risks and is therefore a substantial measure of SCCQ’s continuous improvement year on year.

A combined risk score is calculated based on inherent risk and site characteristics, adjusted for management controls captured in the Self-Assessment Questionnaire (SAQ) and audit results. The score is broken down by the following pillars, and highlights strengths and opportunities to focus SCCQ’s efforts on key areas that drive ethical and sustainable practices.

Labour Standards Pillar – assesses location and industry factors that could increase labour risks, such as vulnerable worker populations or high rates of workplace violations.

Health and Safety Pillar – considers regional and industry-specific health and safety risks, including local regulations and industry accident rates.

Business Ethics Pillar – assesses industry and location risks related to unethical practices, such as high corruption levels or weak regulatory oversight.

Environment Pillar – examines the environmental impact of the site’s industry and location, such as pollution levels or resource use that may create regulatory or compliance risks.

Labour standards – reflects labour-related risks like employment practices, workers rights and wages based on responses to the Sedex Self-Assessment Questionnaire (SAQ). High-risk activities in this area can raise the score.

Health and Safety – based on SAQ responses to questions about site-specific health and safety factors, such as equipment usage, handling of chemicals or accident risks.

Baseline Data Overview

This dataset provides a foundational assessment of supplier engagement, transparency, and modern slavery risk management. It helps identify key trends, areas requiring further attention, and opportunities for strengthened due diligence. The data points included reflect both supplier visibility and compliance activities, ensuring a comprehensive approach to ethical sourcing and governance.

This data serves as a baseline for monitoring supplier compliance and engagement, allowing for evidence-based decision-making in ethical procurement strategies.

	Activity	2023	2024	2025
Internal Staff	Hours spent on modern slavery activities	90	100	100
	Individual staff completed e-learning	3	87	168
	E-learning modules completed	12	93	120
External Supplier Engagement	Total number of suppliers	1031	1033	1791
	Number of suppliers with visible contact information & ABN	92	999	1020
	Number of suppliers across high-risk categories	0	476	703
	Number of ACAN Supplier Surveys completed	0	125	238
	Supplier staff attending capacity building webinars	4	6	17
	Invited to join Sedex	0	19	51
	Joined Sedex	0	37	23
	Sedex SAQ completed	0	3	22
	Social audits	0	0	1
	Corrective actions	0	0	4

Note: The following categories are Not in Scope of the ACAN Category Risk Taxonomy, Pastoral, Payroll (excluding labour-hire and sub-contracting).

SCCQ's New Supplier Process and electronic Supplier Management System (ScanMarket) is showing a marked increase in supplier visibility with a significant jump in number of suppliers with visible contact information and ABN details.

Criterion 6 – Consultation with Owned or Controlled Entities

SCCQ Does not own or control any other entities.

Criterion 7 – Any Other Relevant Information

SCCQ has no further information to add under this Criterion.





CONTACT US

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-  Southern Cross Care (Qld) Ltd
2078 Logan Road
Upper Mt Gravatt Q, 4122





St Vincent de Paul Society
QUEENSLAND
good works



Modern Slavery Statement

1 January to 31 December 2025

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Acknowledgement

We acknowledge the Aboriginal and Torres Strait Islander peoples of this nation. We acknowledge the traditional custodians of the lands on which our organisation is located and where we conduct our business. We pay our respects to ancestors and Elders, past and present. We are committed to honouring Aboriginal and Torres Strait Islander peoples' unique cultural and spiritual relationships to the land, waters, and seas.

Disclosure Note

St Vincent de Paul Society Queensland is an entity incorporated by "Letters Patent" under the Religious, Educational and Charitable Institutions Act 1861 (Amended 1895) (QLD). The Statement was approved by the St Vincent de Paul Society Queensland State Council and St Vincent de Paul Society Queensland Housing Board.

Responsibility for this document rests with St Vincent de Paul Society Queensland and St Vincent de Paul Society Queensland Housing.

Privacy statement

St Vincent de Paul Society Queensland and St Vincent de Paul Society Queensland Housing respects the privacy and dignity of the people it assists, our members, volunteers, and employees. For more information about how the Society manages privacy information please refer to our Privacy Policy on our website.

- St Vincent de Paul Society Queensland ABN 14 211 506 904
- St Vincent de Paul Society Queensland Housing ABN 31 618 167 632

Version Number	Date	Description
Final	29 June 2026	Approved

Modern Slavery Statement Approval and Signature

This statement is submitted as a joint statement in accordance with the Modern Slavery Act 2018 (Cth) ("the Act"). It is submitted by St Vincent de Paul Society Queensland (SVDP QLD) and St Vincent de Paul Society Queensland Housing (Vinnies Housing), in this statement being referred to as "the Society". It describes the steps taken by us to prevent, detect and respond to modern slavery risks in our operations or supply chain during the reporting year ending 31 December 2025.

It is submitted as a joint statement by the following reporting entity:

St Vincent de Paul Society Queensland

ABN: 14 211 506 904

St Vincent de Paul Society Queensland Housing

ABN 31 618 167 632

Ozcare, a special works of the Society, has issued its own modern slavery statement for year 2025.

This Modern Slavery Statement was approved by the principal governing body of the St Vincent de Paul Society QLD and St Vincent de Paul Society Queensland Housing as defined by the Modern Slavery Act 2018 (Cth) ("the Act") on 29 June 2026.



Peter Dougherty, State President

St Vincent de Paul Society Queensland



Dennis Innes, Chair

St Vincent de Paul Society Queensland
Housing

Reporting Criteria 1: About St Vincent de Paul Society Queensland

St Vincent de Paul Society is an international, voluntary, lay Catholic organisation dedicated to tackling poverty and disadvantage by providing assistance to people in need.

The St Vincent de Paul Society Queensland (SVDP QLD) has been operating in Queensland since 1894 as an international, voluntary, lay Catholic organisation dedicated to supporting and assisting people in need. We exist as a member-first organisation, devoted to the prevention of poverty and homelessness, and work to holistically support those experiencing disadvantage to regain sustainable independence by providing them with a hand up, not just a handout.

Our Vincentians (Members belonging to community-based Conferences), Volunteers, and Staff work together to assist those in need with a variety of support services. Our support varies from in-home visits, housing and homelessness support, domestic violence assistance and welcoming people to our support centres, through to generous Government and Society-funded specialist services and programs.

Vinnies Housing is a wholly owned subsidiary of SVDP QLD whose mission is to relieve poverty, distress, and disadvantage through a renewed and strengthened focus on the provision of subsidised housing options and affordable housing and support services to people experiencing housing stress, who are homeless or at risk of homelessness.

Ozcare is another wholly owned subsidiary of SVDP QLD. Ozcare improves people's quality of life through the delivery of personalised health and aged care services, in the spirit of St Vincent de Paul Society Queensland.

Our Mission

We are a lay Catholic organisation aspiring to live the Gospel message by serving Christ in the poor with love, respect, justice, hope, and joy, and by working to shape a more just and compassionate society.

Our Vision

We aspire to be recognised as a caring lay Catholic charity offering a hand up to people in need. We do this by respecting their dignity, sharing our hope, and encouraging them to take control of their own destiny.

Our stakeholders

At the core of our work are the people we assist, our Vincentians, volunteer members, employees, and donors. These are the people who have enabled our good works to continue for the past 131 years. The commitment and compassion of our people empowers them to gain insight into local community needs and issues. Without the generosity of our loyal donors and customers the resources to provide required levels of assistance Queenslanders in need would not be available.

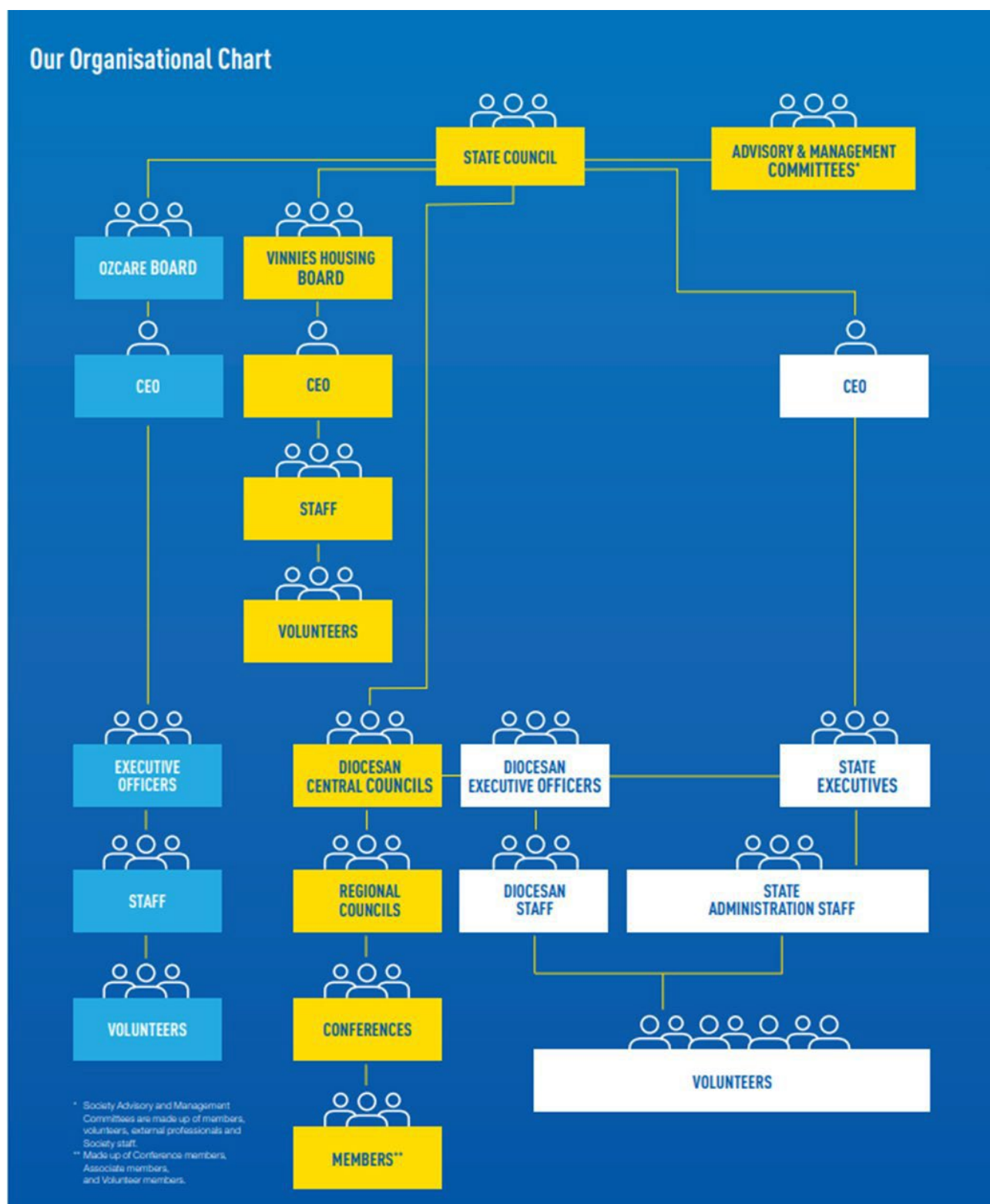
2025 Modern Slavery Risk Management Initiatives

In the reporting period, we continued developing our modern slavery framework, which includes developing our operation and supply chain risk management processes in line with industry best practice.

In 2025, the Society continued the development of its modern slavery risk management framework. We have analysed our suppliers' data under different high-risk categories and assessed potential modern slavery risks in our operations and supply chain. Key initiatives undertaken during the reporting period include:

- Completion of detailed supplier data analysis and categorisation of over 2,000 suppliers
- Comprehensive risk analysis on the significant supplier base of 505 suppliers representing 95% of total procurement spend
- Completion of the Sedex Self-Assessment Questionnaire (SAQ) for our primary site
- Continuation of stakeholder training programs to raise awareness of modern slavery indicators
- Development and commencement of a supplier engagement strategy for high-risk categories
- Ongoing partnership with Domus 8.7 for modern slavery risk management capability uplift
- Participation in the Australian Catholic Anti-Slavery Network (ACAN) modern slavery risk management program

Reporting Criterion 2: Our Structure, Operations and Supply Chains



Our Governance Framework

We rely on our Boards to effectively govern the various activities and relationships that make up our organisation. The Society's governance framework provides the foundation for effective management and accountability across all operations.

Legal Structure

St Vincent de Paul Society Queensland (SVDP QLD) is incorporated by 'Letters Patent' pursuant to the Religious Educational and Charitable Institutions Act 1861. This entity is charged with responsibility for providing the organisational structure and support for its members to carry out our charitable work in Queensland.

Vinnies Housing is a wholly owned subsidiary of SVDP QLD incorporated under the Corporations Act 2001 (Cth). SVDP QLD holds reserve powers to ensure that at all times Vinnies Housing acts within the philosophy, mission and values of the Society. This includes SVDP QLD appointment of board members, the majority of which will be Vincentians and approval of the strategic direction of Vinnies Housing.

Membership

SVDP QLD has three categories of membership: Conference members (also called Vincentians) join in Conferences. They seek to live out their faith and voluntarily offer their time, expertise, and support for the delivery of our good works. Conferences may be established within a parish, town, suburb, school, workplace, or social group. Any person registered as a Conference member has voting rights in relation to the affairs of SVDP QLD. Associate members also live out their faith in action but do not attend Conference meetings nor have voting rights. Volunteer members are those who respect the ethos and mission of SVDP QLD and who volunteer in any of its works or programs.

Boards

The State Council of SVDP QLD consists of the President and Vice Presidents, Diocesan Central Council Presidents, State Treasurer, Youth Representative, Spiritual Advisor and State Secretary. The State Council established a State Administration Office, overseen by the Chief Executive Officer, to which it delegates various corporate and operational functions. To assist with decision-making, the State Council is also supported by advisory committees established to manage activities requiring specific capability and expertise. The State Council is ultimately responsible for the overall governance of SVDP QLD, its subsidiaries and all its Councils and Conferences. The President of State Council is SVDP QLD's representative on the National Council of The St Vincent de Paul Society in Australia.

The Board of Vinnies Housing consists of a Chair and Directors, with a majority being members of SVDP QLD. The Board is ultimately responsible for the overall governance of Vinnies Housing.

Remuneration

Our Board members do not receive payment for their services. Their positions are voluntary. However, some members are provided with the use of a fleet vehicle to facilitate travel and are reimbursed for costs they incur to attend meetings, or while performing the duties associated with their roles.

Risk Management

Our Boards oversee the establishment, implementation, and review of the organisational Risk Management Framework. The framework includes the following documents: Risk Management Policy; Risk Management Strategy and Risk Registers.

Our Risk Management Policy sets out the principles that all levels of our operations need to comply with in managing risk. The Audit and Risk Committee is the key advisory committee with oversight of our risk management practices.

Our Modern Slavery Governance Framework

The Society has established a Modern Slavery Working Group and appointed a Modern Slavery Liaison Officer. The Working Group brings together representatives from key functions, including programs, mission, people and culture, retail and operations, governance and risk, and procurement. The Working Group meets every two months and supports the identification and management of modern slavery risks, coordination of action plans, awareness activities and reporting to senior leaders and governing bodies.

The details of working group representatives are as per the following:

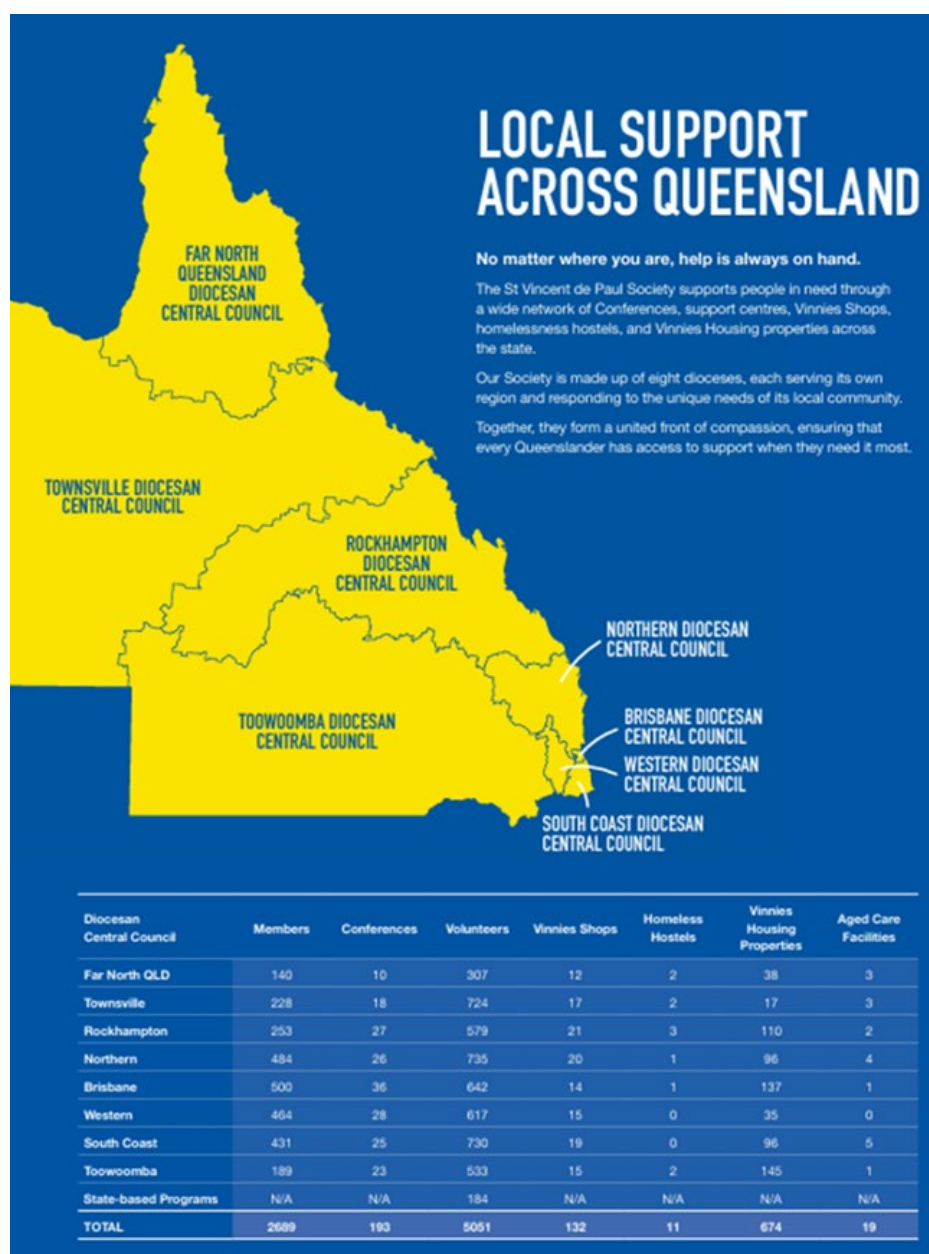
- General Manager Programs (Chair)
- Director of Mission
- Learning and Development Specialist, representing People and Culture
- State Program Manager Community and Family, representing Programs
- Western Executive Officer, representing Retail and Operations
- Risk and Compliance Manager, representing Governance and Risk
- Procurement Manager (Modern Slavery Liaison Officer - MSLO)

Our Operation

St Vincent de Paul Society Queensland provides a range of services and supports across Queensland, including family support centres, Vinnies Shops, housing solutions, homelessness intervention and prevention services, crisis accommodation, drug and alcohol recovery, disaster relief, aged and disability services, financial wellbeing services, food distribution, child and family support, migrant and refugee services, youth services, education and employment pathways.

Vinnies Housing works to relieve poverty, distress and disadvantages by providing subsidised housing options to people in need, including people requiring accommodation, people with complex and specific needs, people in

disadvantaged target groups and people on very low household incomes. It also provides affordable housing and support services to people experiencing housing stress, homelessness or risk of homelessness.



Our Supply Chain

The Society purchases most goods and services locally from Australian suppliers; however, we recognise that some goods and inputs may originate overseas and that risk may exist beyond direct tier-one suppliers. We have inspected manufacturing facilities of some overseas suppliers and retain the ability to conduct audits..

The Society has more than 2,000 suppliers on its records, ranging from tactical suppliers to cooperative and strategic partners. Our key categories of expenditure include:

- Building and construction services
- Facility maintenance (cleaning, pest control, security, landscaping)
- Food and beverages
- Furniture, fittings, and equipment
- Information and communication technology (ICT)
- Travel and accommodation
- Uniforms and personal protective equipment
- Transport and logistics
- Waste management services
- Professional services (consulting, legal, audit)
- Utilities (electricity, gas, water, telecommunications)

We have been categorising our supply chain to identify areas of higher risk and will continue to develop the taxonomy to allow for open and honest reporting. Supplier onboarding and due diligence processes may include review of business registration, insurance, licensing, safe work practices, police checks where suppliers may work onsite in homes of vulnerable people, annual reviews, financial delegations, conflicts of interest, whistleblower arrangements, modern slavery assessment questionnaires for high-risk suppliers, contractual provisions relating to modern slavery compliance, and ongoing supplier performance monitoring.

We are also working to increase the transparency of our supply chain to increase visibility of emerging risks. We have visibility of our direct tier-one suppliers, but we acknowledge there is a need to bridge the gap for tier two suppliers.

Our People

We have a diverse workforce to support the 'good works achieved through the organisation's services and programs in accordance with our mission.

Effective systems have been implemented to ensure fair and transparent policy and procedures are implemented to ensure we comply with industrial relation legislation and best practices.

Employees are engaged under an Employee Agreement that complies with relevant legislation. Senior Executive Managers are employed under contractual arrangements that have been reviewed by external legal consultants and bench marked by external providers. We also regularly review employee remuneration practices.

Our people are required to adhere to the organisation Code of Conduct and policies and procedures that cover Bullying & Harassment, Privacy legislation, Whistleblower, Complaints and Compliments,

Policies and procedures are reviewed regularly to ensure best practices and compliance requirements are met. Staff are trained in policies and procedures through our Learning Management system.

Entity	Employees	Volunteers	Members
SVDP QLD / Vinnies Housing	697	5,051	2,689

Reporting Criterion 3: Modern slavery risks in operations & supply chain

In 2025, the Society undertook a comprehensive risk assessment of its significant supplier base. A total of 505 significant suppliers (>\$10k AUD), were identified, representing approximately 95% of total procurement spend (\$68.6 million AUD). Suppliers were classified into risk categories based on industry sector, geographic location, and workforce profile indicators.

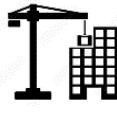
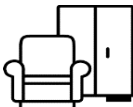
Supplier risk classification	Spend assessed	Share of assessed spend	Number of suppliers	Number of categories
High risk	\$48,109,000	70%	349	11
Medium risk	\$7,751,000	11%	44	4
Low risk	\$12,745,000	19%	112	4
Total assessed	\$68,605,000	100%	505	19

The following categories of suppliers were classified as high risk, with the number of suppliers in each category:

- Building and construction (27 suppliers)
- Facility management and property maintenance (225 suppliers)
- Food and catering services (34 suppliers)
- Furniture and office supplies (41 suppliers)
- ICT Hardware and Software (3 suppliers)
- Travel and accommodation (21 suppliers)
- Uniforms and PPE (1 supplier)
- Transport, logistics and warehouse (4 suppliers)
- Waste management services (2 suppliers)

Facility maintenance represents the highest concentration of high-risk suppliers (225 of 349) due to the high prevalence of labour-intensive work, subcontracting practices, and vulnerability of workers in cleaning, security, and maintenance sectors.

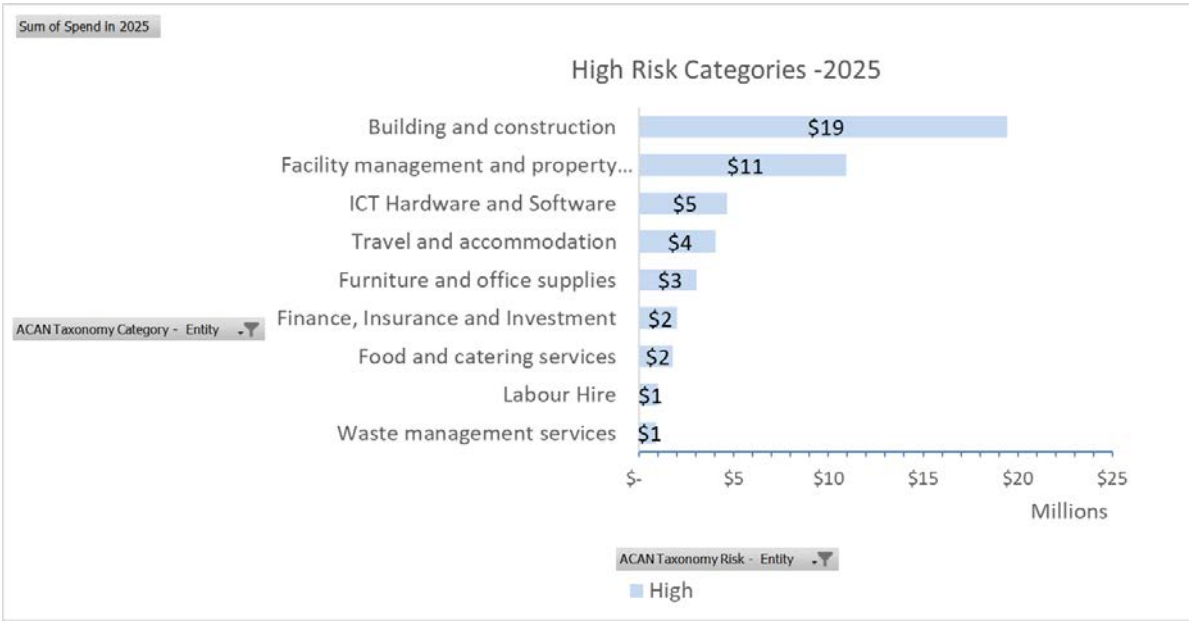
High-risk areas by value

	\$10.9m Facility management		\$19.4m Building & Construction
	\$4.1m Travel & Accommodation		\$3.1m Furniture & Office
	\$1.8m Food & Catering		\$900k Waste

Supply Chain Risks

Industry Sector

Our four highest spending categories are Construction and Building, Facility maintenance services (FM), Communications Technology (ICT), Travel and Assisted Accommodation services.



Property and facility management, building and construction, food and assisted accommodation, waste management, furniture and office supplies, travel and accommodation, logistics and imported products are recognised as areas requiring focused attention because they may involve low-wage labour with high turnover and low barrier of entry, subcontracting, franchising, temporary workforces, migrant or otherwise vulnerable workers, or work that may be dirty, dull or dangerous. These characteristics can increase the risk of forced labour, wage underpayment, excessive working hours, inadequate worker voice or poor conditions, particularly when services are subcontracted or where visibility beyond the direct supplier is limited.

Facility management remains a key focus area because supplier selection can be decentralised and driven by local availability. Many providers are small businesses that may not previously have undergone structured procurement due diligence. This creates the risk of inconsistent onboarding, limited modern slavery capability and uneven contract management. Society is assessing the suitability of a more centre-led approach for high-risk spend categories and is continuing to build modern slavery awareness among staff and managers involved in procurement and supplier selection.

The ICT category is generally assessed as medium risk for the Society because the majority of ICT spend relates to software services.

Geographic location

While we predominantly use Australian suppliers, we recognise that some of our goods and services may come from other countries.

Supplier's Workforce Profile

In undertaking our supplier analysis, we considered the type of labour involved in the production of our goods and services, particularly where low skilled, vulnerable, or migrant labour is used, or where the work is deemed as '3D' work (dirty, dull, or dangerous). Based on these indicators, we identified that potentially high risk spend is within five spend categories:

- Property and facility maintenance services (FM)
- Building and construction
- Food, Groceries and assist Accommodation.
- Waste management
- Furniture and Office supplies

Operational Risks

Modern slavery risks can also arise from the way goods and services are procured and managed.

Inflationary pressure, internal stakeholder pressure, decentralised procurement and pressure to obtain the lowest price may increase the likelihood that due diligence is compressed or omitted. Where agility and cost minimisation are prioritised over structured supplier assessment, there is a risk of reduced transparency and accountability.

The Society's operational controls are designed to reduce these risks through policies and procedures, training, procurement governance, supplier due diligence, contract clauses, whistleblower and grievance mechanisms, and escalation pathways. However, the Sedex assessment demonstrates that further work is required to formalise modern slavery policy, supplier expectations, data monitoring, role-based training and evidence of effectiveness.

Inflationary Risk

Inflationary risk is a challenge for our organization, as it can affect the purchasing power of our budgets and make it harder to source goods and services. Inflationary pressures could lead to a focus on cost-cutting measures that may compromise the standards of procurement, including supplier due diligence.

Internal stakeholder pressure and decentralised procurement may increase the operational risks related to modern slavery. Where agility in sourcing goods and services is prioritised over proper supplier due diligence processes, there is a risk of lack of transparency and accountability in the supply chain, increasing the risk of modern slavery. Mitigating this risk is planned training, and for all relevant staff and stakeholders to have a clear understanding of the importance of ethical procurement practices and the risks associated

with modern slavery.

Decentralisation of procurement is another operational risk that can increase the likelihood of modern slavery. When procurement is decentralised, it can be challenging to maintain consistent standards across the organization, and the risk of modern slavery may be greater. We are reviewing our policies and procedures for procurement to provide training and guidance to staff on ethical procurement practices.

Pressure on Suppliers to Get the Lowest Price

Pressure on suppliers to get the lowest price can also lead to operational risks related to modern slavery. When suppliers are forced to cut costs, they may resort to unethical practices, such as paying workers below the minimum wage or using forced labor. We have planned to work with our significant suppliers to ensure that they are aware of the risks associated with modern slavery and that they are committed to ethical business practices.

Reporting Criterion 4: Actions taken to assess and address risk

In the reporting period, we assessed our potential modern slavery risks in operations and supply chain and commenced planning to bridge the gaps identified. The cornerstone of the reporting period was conducting the modern slavery risk analysis on our supplier portfolio and expanding the analysis to a larger supplier base (505 suppliers) compared to the previous reporting period (162 suppliers).

In the reporting year, we benefited from our collaboration with the Australian Catholic Anti-Slavery Network (ACAN) and used the resources with other like-minded entities and developed supplier selection processes in line with industry acceptable practice.

Key Actions in 2025:

During the 2025 reporting period, the Society undertook the following key actions to assess and address modern slavery risk:

- Continued engagement with ACAN and Domus 8.7 consultancy for modern slavery risk management framework uplift and professional guidance
- Completed comprehensive supplier data analysis, identifying and categorising 505 significant suppliers representing 95% of procurement spend
- 147 suppliers completed the ACAN supplier to identify supplier revenue, number of employees, countries of origin for goods sourced overseas, workforce contractual arrangements and Sedex membership status. Through the ACAN Supplier Survey, we have identified that 49% of respondents have a revenue of \$25M or less, and 32% have 50 or less employees, but 57% of companies engage in high-risk contractual obligations with their workers (casuals, sub-contractors, temporary visa holders, labour hire, workers under 18 years of age). This highlights the need to build capacity with free accessible tools in addition to best in class solutions like Sedex
- Together with the ACAN network, launched free supplier education on modern slavery and risk management in key areas: cleaning, building and construction, procurement of labour, labour hire and services, sourcing goods from overseas, grievance mechanisms and remediation
- Developed and applied a risk assessment methodology to classify all significant suppliers into high, medium, and low risk categories
- Identified 28 suppliers for Sedex onboarding, with 7 suppliers joining Sedex and 1 completing the Self-Assessment Questionnaire that helps suppliers to evaluate their practices against established standards and identify areas for improvement
- Delivered modern slavery awareness training to key stakeholders across the organisation
- Commenced development of a Modern Slavery Policy (currently in draft, pending approval)
- Commenced development of a Supplier Code of Conduct
- Continued membership and active participation in the Australian Catholic Anti-Slavery Network (ACAN)
- Maintained the Modern Slavery Working Group with quarterly meetings and reporting to the Executive Leadership Team

Grievance and Remediation

To date, SVDP QLD has not identified any individuals impacted by modern slavery in its supply chains or operations. SVDP QLD is committed to ensuring it provides appropriate and timely remedy to people impacted by modern slavery in accordance with the United Nations Guiding Principles on Business and Human Rights, Commonwealth Modern Slavery Act 2018 – Guidance for Reporting Entities and relevant Australian laws. This includes providing for, or cooperating in, actions to address harms to people and root causes to mitigate future risks if SVDP QLD is found to have caused or contributed to modern slavery.

Domus 8.7

SVDP QLD] is a founding member of Domus 8.7 Modern Slavery Remediation Service. Domus 8.7 provides [Insert entity name]:

- resources that enable us to listen to workers (grievance channel)
- a 24/7 careline for workers on our sites, staffed by professional counselors
- direct support to people impacted by modern slavery
- guidance and technical assistance to prevent, identify and remediate modern slavery
- a documented process to assess if an organisation has caused, contributed or is directly linked to modern slavery and modern slavery indicators

Domus 8.7 empowers people impacted by modern slavery to have choice and control over what forms of remediation are meaningful to them and to engage safely with business/supply chain actors. Supports may include:

- modern slavery indicator assessment
- needs assessment, case coordination, response and remediation planning
- referrals to community, social services, unions
- transport, accommodation, financial and food support
- legal support, referrals, accompaniment and advocacy
- job training, retraining and redeployment
- accompaniment and advocacy to engage with government and law enforcement agencies
- opportunities to contribute lived expertise to improve modern slavery responses

The Domus 8.7 Advisory Committee Members also include a person with lived expertise, Mr Moe Turaga. Domus 8.7 is a registered charity with the Australian Charities and Not-for profits Commission (ACNC) and is an endorsed Public Benevolent Institution with Deductible Gift Recipient (DGR) status. ABN 24472497189

Reporting Criterion 5: Effectiveness of Actions

Modern Slavery Self-Assessment (SAQ) and Sedex Risk Score analysis

In 2025, the Society completed the Sedex Self-Assessment Questionnaire (SAQ). The SAQ provides a comprehensive risk profile for our operations. The Society received a combined risk score of 4.5 out of 10, classified as Medium risk. This score is derived from the weighted combination of inherent risk factors (based on country and sector risk) and site-specific characteristics, adjusted for the level of management controls in place. A medium risk rating indicates that while the organisation operates in a relatively moderate-risk environment, there are areas where management controls can be strengthened to further reduce the overall risk profile

The following analysis presents the risk scores, management controls assessment, and interpretation of findings.

Combined Risk Score: 4.5/10 – Medium Risk

The Society received a combined risk score of 4.5 out of 10, classified as Medium Risk. This score is derived from the weighted combination of inherent risk factors (based on country and sector risk) and site-specific characteristics, adjusted for the level of management controls in place. A medium risk rating indicates that while the organisation operates in a relatively moderate-risk environment, there are areas where management controls can be strengthened to further reduce the overall risk profile.

Inherent Risk: 4.2/10 – Medium Risk

The inherent risk score of 4.2/10 reflects the baseline risk associated with the Society's industry sector (community services and retail) and geographic location (Australia). This score is independent of organisational controls and represents the structural risk environment

Site Characteristics Risk: 4.7/10 – Medium Risk

The site characteristics risk score of 4.7/10 reflects risk factors specific to the Society's operational site, including workforce composition, employment practices, and operational complexity.

Management Controls Assessment: 2.9/5 – Moderate

For Management Controls the higher score means lower risk. The management controls score of 2.9 out of 5 (Moderate). Risk management controls assessed across four pillar. labour standards, Health and Safety, Business ethics and Environment The scores showed stronger performance in business ethics and health and safety (4 and 3.8 out of 5 consecutively), with weaker performance in labour standards. The labour standards management controls score of 2.8 out of 5 indicates that priority should be given to policy approval, training, wage assurance, contractor controls, supplier conduct expectations and worker voice.

Area Requiring Improvement

The SAQ identified several areas where the Society's management controls need strengthening:

- **Children and Young Workers (1.6/5 – Fair):** This is the lowest-scoring section. While the Society has minimum age verification processes and does not employ anyone under 18, the current controls are limited to basic age checks. A comprehensive child labour and young worker policy that extends beyond minimum age compliance is required, particularly given the organisation's extensive engagement with children through its community services programs.
- **Communities and Human Rights (1.8/5 – Fair):** The Society currently lacks a formal Supplier Code of Conduct, and human rights due diligence is limited primarily to board-level oversight. There is an opportunity to strengthen community engagement processes and develop more robust human rights impact assessment procedures, particularly for high-risk supply chain categories.
- **Discrimination (2.3/5 – Moderate):** While anti-discrimination policies exist, the SAQ identified gaps in comprehensive implementation and monitoring. Training on discrimination awareness extends to managers but may not reach all levels of the workforce. Systematic tracking of discrimination-related complaints and resolutions needs to be enhanced.
- **Wages (2.4/5 – Moderate):** The Society has not conducted audit on compliance with legal minimum wages for contractor and suppliers. While legal compliance is maintained, best practice requires a proactive assessment of whether wages meet legal wage benchmarks, particularly for contractors and agency workers.
- **Regular Employment (2.7/5 – Moderate):** Labour standards compliance measures for contractors are currently focused on high-risk contractors only. There is an opportunity to extend due diligence and compliance monitoring to all contractors and labour providers engaged by the Society.

Additional findings from the SAQ that inform the Society's modern slavery risk profile include:

- The Society's Modern Slavery Policy is currently in draft form and pending formal approval — this represents a gap in the governance framework
- A compliance notice under the Fair Work Act was received within the last three years, highlighting the importance of ongoing labour standards monitoring
- Training on identification of worker exploitation is limited to general awareness only — specialist training for high-risk roles is recommended
- The Society does not hold ISO 45001 certification for occupational health and safety management
- No formal Supplier Code of Conduct is currently in place to set minimum ethical standards for the supply chain

Analysis – Maturity Results for 2025

The following key performance indicators and achievements were recorded during the 2025 reporting period:

- Incorporated modern slavery requirements into procurement policies and procedures
- Restructured and form an effective modern slavery working group with representatives from key operation areas to oversee and implement the action plans
- Execution of new Procurement Policy, introduced a risk-based approach on categories of spending to engage procurement in sourcing and supplier selection activities
- Included general clauses on modern slavery in all high-risk supplier contracts in year 2024
- :505 significant suppliers identified and risk-assessed (target: 500+)
- 100% of Sedex SAQ completed for primary site
- Maturity self-assessment score improved to 42% (target: 40%+)
- Modern Slavery Working Group met quarterly as planned (4 meetings held)
- Supplier risk classification methodology developed and applied

-
- Modern slavery awareness training delivered to key stakeholders
 - Draft Modern Slavery Policy developed (pending approval)
 - Continued active participation in ACAN network activities

Modern slavery action plan and road map

The Society maintains a modern slavery action plan as part of its ongoing commitment to continuous improvement. The action plan is reviewed and updated quarterly by the Modern Slavery Working Group and progress is reported to the Executive Leadership Team and State Council:

2026 Risk Mitigation Improvement Plan:

- Finalise and obtain formal approval for the Modern Slavery Policy
- Initiate drafting of the Supplier Code of Conduct
- Engage additional high-risk suppliers on the Sedex platform
- Complete annual Sedex SAQ re-assessment in Q4 of 2026— target management controls score of 3.5/5
- Report to ELT and Safeguarding Committee on improvement outcomes in Q4 2026
- Prepare 2026 Modern Slavery Statement from Nov 2026

Overall Improvement Targets for 2026

Metric	2025 Baseline	2026 Target
Sedex Management Controls Score	2.9 / 5 (Moderate)	3.5 / 5 (Good)
Sedex Combined Risk Score	4.5 / 10 (Medium)	< 4.0 / 10 (Medium-Low)
Modern Slavery Policy	Draft	Approved and implemented
Supplier Code of Conduct	Not in place	Approved and Rolled Out

•



Reporting Criterion 6: Process of consultation with entities owned or controlled

This statement covers St Vincent de Paul Society Queensland and St Vincent De Paul Society Queensland Housing. The Statement was approved by the St Vincent de Paul Queensland State Council and Vinnies Housing Board.

The other wholly owned subsidiary of SVDP QLD - Ozcare has issued its own Modern Slavery Statement which can be accessed on the ACAN website <https://www.acan.org.au/acan-modern-slavery-statements>

Consultation between SVDP QLD and Vinnies Housing on the development of this Statement occurred through the Modern Slavery Working Group, which includes representatives from both entities

Reporting Criterion 7: Other Relevant Information

- No other relevant information

2025

MODERN SLAVERY STATEMENT



Catholic
Archdiocese
of Adelaide

DISCLOSURE

This statement has been produced on behalf of Catholic Church Endowment Society Inc (CCES) ABN 29 608 297 012. It covers all entities owned or controlled by CCES, including Catholic Education Office ABN 91893631195 and Centacare Catholic Community Services (formally named Centacare Catholic Family Services) ABN 21578907988.

This Modern Slavery Statement was approved by the principal governing body of the Catholic Church Endowment Society Inc as defined by the Modern Slavery Act 2018 (Cth) (the Act) on 22nd May 2026.

This Modern Slavery Statement is signed by Archbishop Patrick O'Regan as the sole Trustee of the Catholic Church Endowment Society Inc, the responsible member as defined by the Act.



Catholic
Archdiocese
of Adelaide



ACKNOWLEDGEMENT OF COUNTRY

We respectfully acknowledge Aboriginal and Torres Strait Islander people as the First Peoples of this country and especially acknowledge the traditional owners on whose lands we live and work throughout the Catholic Archdiocese of Adelaide.

We also acknowledge Elders, past, present and pay tribute to those who have contributed to the social, economic, cultural, political, and spiritual life of our community.

This acknowledgement affirms our commitment to social justice and the importance of healing and reconciliation between Indigenous and non-Indigenous peoples.

APPROVAL

A message from Archbishop Patrick O'Regan

The Archdiocese of Adelaide has been a member of the Australian Catholic Antislavery Network (ACAN) since 2020. This is the Archdiocese's third Modern Slavery Statement and reporting year.

The Archdiocese is already committed to the tenets of Catholic social teaching and recognises alignment with our commitment in this space with the dignity of the human person, in particular the worker and the common good.

In 2023, we formed a working group to progress activities leading to reducing modern slavery risks throughout the Archdiocese which included examination of our supplier network with the support of ACAN.

In 2024 & 2025, the Archdiocese working group has further progressed these actions, with still more to do.

We look forward to continuing this important work in 2026.

In Domino,



+Patrick O'Regan DD
Archbishop of Adelaide

*"True peace begins with the recognition
and protection of the God-given dignity of
every person."*

- Pope Leo XIV

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CRITERIA 1 and 2

About Archdiocese of Adelaide

Mission

Governance Framework

Organisational structure and geographic regions

About the Archdiocese of Adelaide

The Catholic Church in South Australia dates back to 1842. Today the Adelaide Archdiocese is home to 253,870 Catholics, 15.7 per cent of the total population (ABS 2021 Census). The Church employs more than 11,800 people working across the industry sectors of education, health, social services and parishes. The Church also has many volunteers who assist and support their communities. The Adelaide Archdiocese covers an area of 105,000sq km, taking in the city of Adelaide and outer metropolitan areas as well as the regional areas of Yorke Peninsula, Riverland, Barossa Valley, Adelaide Hills, Fleurieu Peninsula, Kangaroo Island, Coorong, South East and Limestone Coast. There are 56 parishes with 125 mass centres, and 22 multicultural communities in the Archdiocese. The rich cultural diversity of the local Church is reflected in 22 migrant communities. In 2025, there were more than 54,000 students attending 89 Catholic schools in the Archdiocese. Through community and social services, more than 20,400 people sought assistance across 34 locations or through outreach services into communities.

Our Hope for the Future

Following local consultations that took place in the lead up to the Plenary Council and responses to the 2021 and 2022 Diocesan Assemblies, the Archdiocese launched a vision and mission for the Church in Adelaide in 2023.

Vision

The Adelaide Catholic Archdiocese strives to be a welcoming Christ-centred community of servant leaders, committed to listening, discerning and growing in the Spirit, as disciples journeying together and as co-creators of the world that God desires.

Mission

As followers of Jesus, loved by God, nurtured and formed in community we are called to be:

- Sharers of faith, hope and love
- Builders of bridges
- Healers of broken relationships
- Agents of transformation in a world that cries out to be made whole.

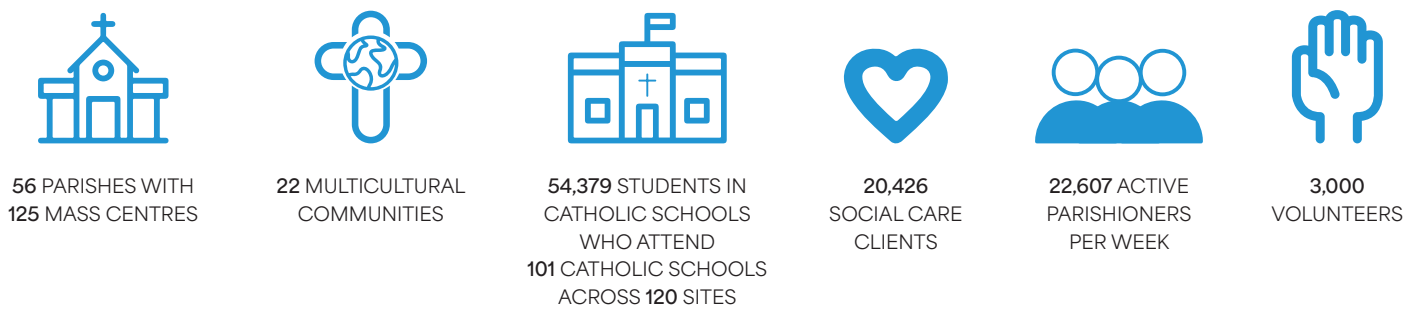
ABOUT

The activities undertaken within the CCES encompass our Catholic schools, parishes, and welfare services delivered through Centacare. The relevant overarching civil entities established within the Archdiocese are the:

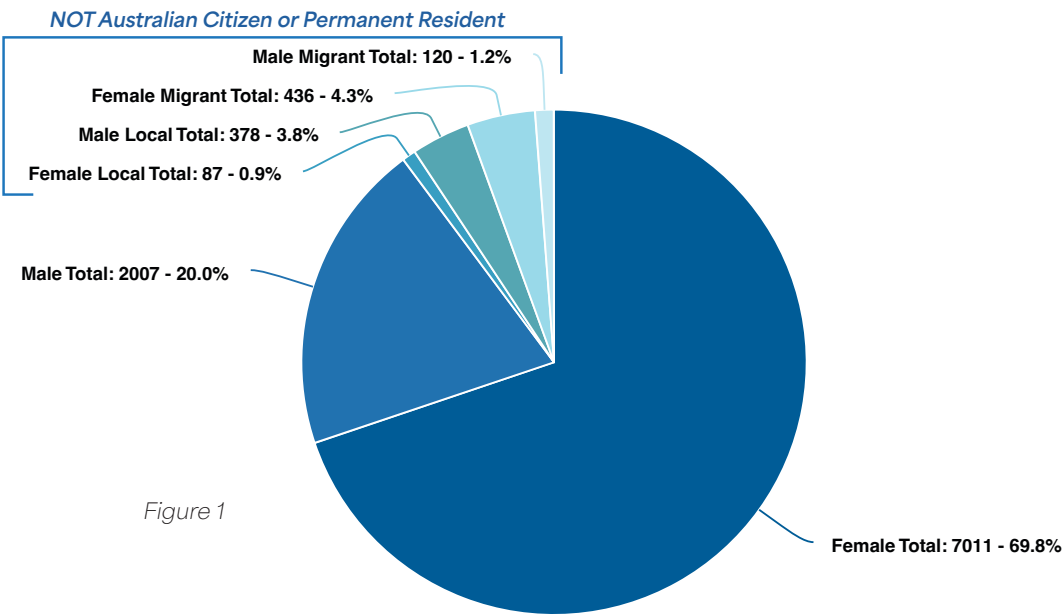
- Catholic Church Endowment Society Incorporated
- South Australian Commission for Catholic Schools Incorporated.

For clarity, this 2025 Modern Slavery Statement includes the entire financial spend across Centacare Catholic Community Services, the administrative expenditure from the Archdiocese of Adelaide office, as well as the Catholic Education Office. It is anticipated that in the coming years, we will examine the suppliers of both individual parishes and those of our Catholic schools.

Operations (Demonstrated Graphically)



Workforce Profile



Employees in the Archdiocese total 11,500 and span the industry sectors of education, health, social services and parishes. Not all entities record female and male local and migrant employees (as depicted).

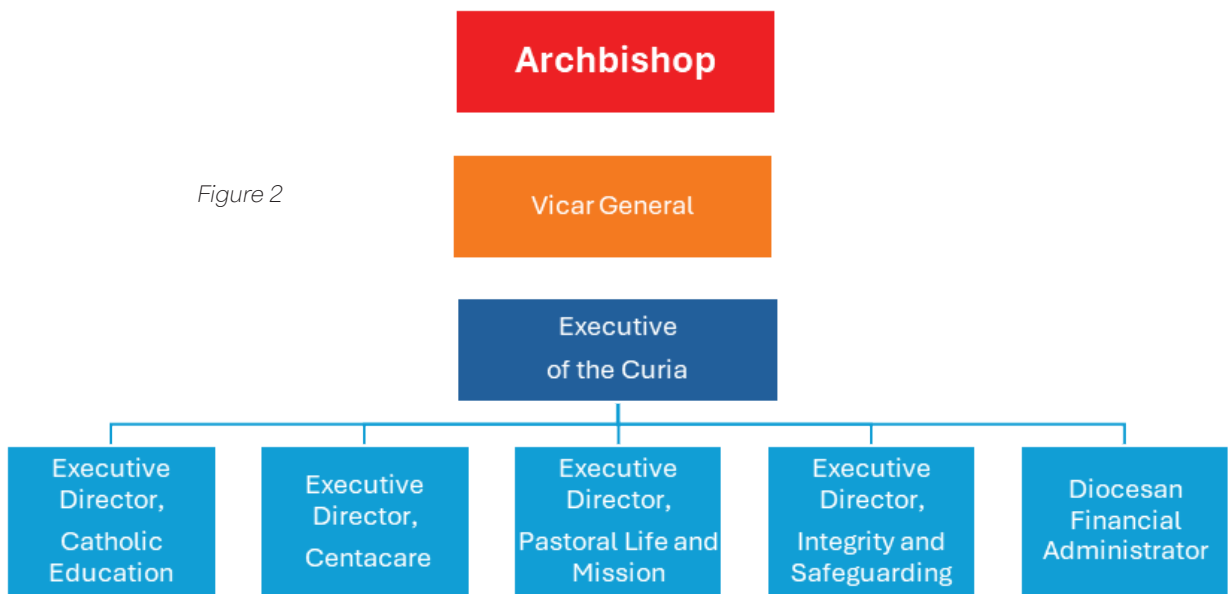
Governance Structure

The Catholic Church Endowment Society Inc. (CCES) is the legal entity for all parishes and agencies of the Archdiocese.

The Archbishop of Adelaide is the Ordinary for the Archdiocese and has canonical authority for the operation of each of the parishes, agencies, schools and services of the Archdiocese.

The Archbishop is at the head of the governance structure (refer *Figure 2*). To assist in his role the Archbishop delegates certain responsibilities to the Executive Directors of the agencies and services outlined below.

The Executive Directors’ roles are to ensure that the civil law responsibilities including financial accountability, legislative compliance, risk management and people management are met. The Executive Directors, Director of Communication, the Vicar General and the Archbishop form the Executive of Curia. The Executive of the Curia meets monthly and has responsibility for matters of operational and mission-related significance, including modern slavery.



The CCES Modern Slavery Working Group is accountable to the Executive of the Curia. The Working Group has appointed a Modern Slavery Liaison Officer, to act as a key contact between CCES and ACAN, with this key contact being the Executive Director, Pastoral Life and Mission. The Executive Director, Pastoral Life and Mission is also the chair of the CCES Modern Slavery Working Group, with membership including representatives from the main business units of CCES that are subject to meeting the modern slavery obligations under the Act.

Risk Management

The Catholic Archdiocese of Adelaide has adopted a structured approach to risk management within our internal Catholic Safety and Injury Management team.

On behalf of the worksites within the Church, CCES holds a Self-Insurer Registration with ReturnToWorkSA. Being self-insured under this scheme provides financial and personal benefits for Catholic Church employers and workers.

Catholic Safety & Injury Management South Australia (CSaIM SA) is the unit responsible for the implementation and management of the Safety & Injury Management System for the Catholic Church in South Australia.

CRITERIA 3

Modern slavery risks in operations and supply chains

Risk Assessment

For Catholic entities, modern slavery risks are defined by the ACAN Category Risk Taxonomy, a classification standard that identifies severity of actual or potential harm to people (saliency) in spend categories.

The ACAN Category Risk Taxonomy is based on sources such as:

- the Global Slavery Index
- the International Labor Organisation (ILO), including definitions of modern slavery
- the Bureau of International Labor Affairs (ILAB), U.S Department of Labor
- the Global Child Forum and UNICEF

Four key factors are also used to determine the level of risk:

- **Geography:** the country or location where a good is made or service is delivered
- **Industry:** the sector in which the making of goods or delivery of service occurred
- **Commodity:** the raw materials or components that comprise the goods or products
- **Workforce vulnerability:** such as bonded visas, temporary migrants, women or children known to be employed in specific industry sectors
- **Domus 8.7:** trends, cases, and risk intelligence identified through the Domus 8.7 remediation service, including grievances and remediation insights relevant to category and risk to workers.

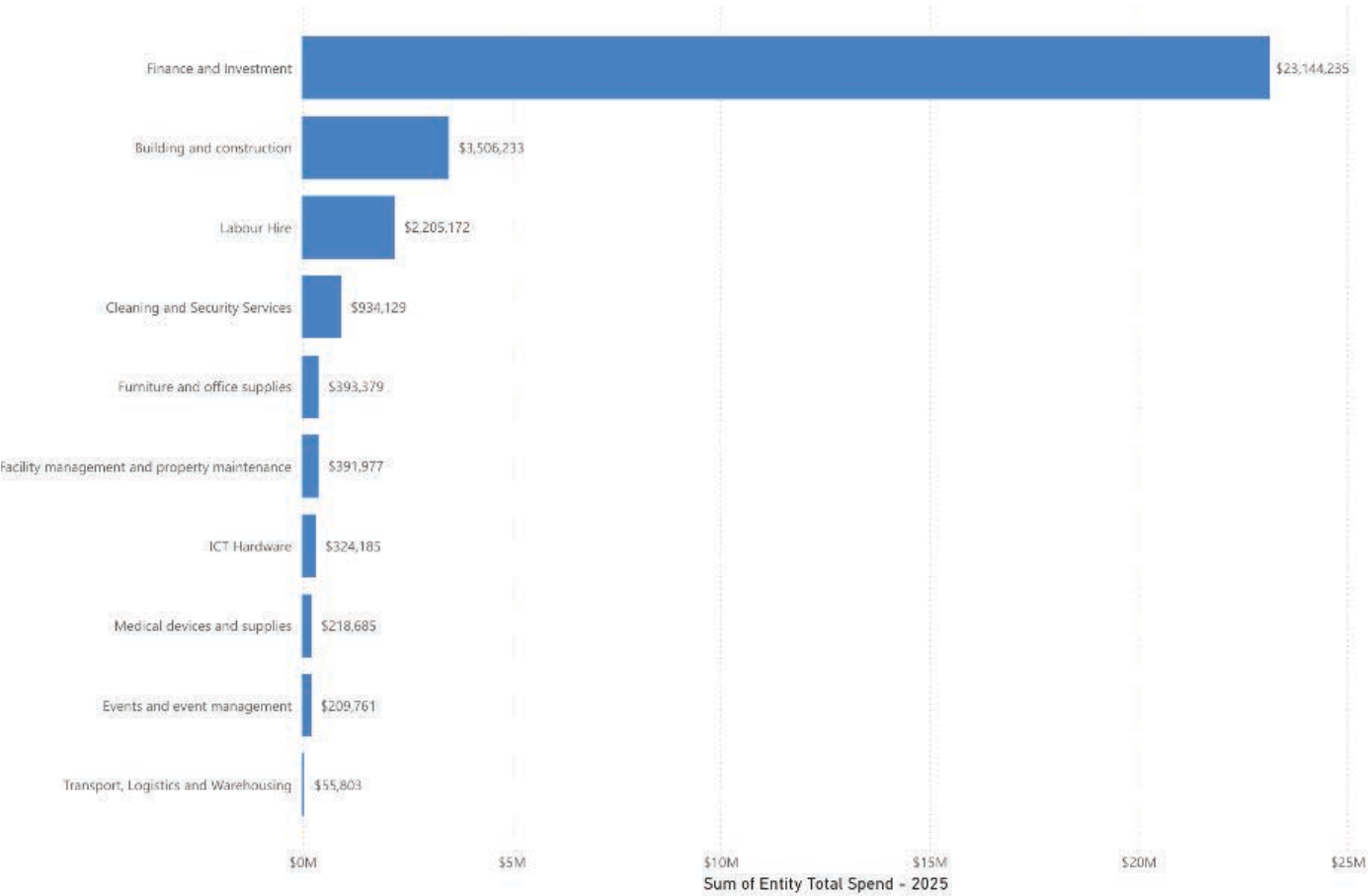
VENDOR ANALYSIS					
	No. of Vendors	Vendors Reviewed	% of Total Spend	Max Spend/ Vendor	Min. Spend/ Vendor
Catholic Education	50	0	0	\$51,699,110	\$193,567
Archdiocesan Services	50	0	0	\$16,270,414	\$40,255
Centacare	50	0	0	\$11,983,953	\$39,682

RISK LEVEL SUPPLIERS

CLASSIFICATION		
High Risk	Medium Risk	Low Risk
• Building and construction • Cleaning and Security • Events and event management • Facility management and property maintenance • Finance and Investment • Food and catering services • Furniture and office supplies • ICT Hardware • ICT Software and network services - offshore • Labour Hire • Linen, laundry and textile products • Medical devices and supplies • Transport, logistic and warehousing • Uniforms and PPE • Waste management services	• Advertising & Marketing • ICT Software and network services - onshore • Utilities • Fleet management, consumables and maintenance • Travel and accommodation • Print / Mail Provider	• Professional services • Financial expenses • Government and agency fees • License / membership fees

Note: The following categories are Not in Scope of the ACAN Category Risk Taxonomy

- Pastoral
- Payroll (excluding labour-hire and sub-contracting)



CRITERIA 4

Risk Management Actions

ACAN Supplier Engagement

The ACAN Program provides supplier engagement support and data, enabling a systematic and comprehensive supply chain risk assessment. In 2025 the ACAN Modern Slavery Risk Management Program launched a new purpose-built data management platform - ROTA. ROTA centralises the ACAN Risk Management Program framework and facilitates supplier performance evaluation and engagement.

1. Evaluation of the modern slavery risk within operations and supply chains, using the ACAN Risk Taxonomy
2. ACAN Supplier Survey to identify supplier revenue, number of employees, countries of origin for goods sourced overseas, workforce contractual arrangements and SEDEX membership status.
3. Supplier education on modern slavery and risk management in key areas: cleaning, building and construction, procurement of labour, labour hire and services, sourcing goods from overseas, grievance mechanisms and remediation
4. Onboarding suppliers to SEDEX requires a business address, contact details and goods or services provided
5. SEDEX Self-Assessment Questionnaire (SAQ) helps suppliers to evaluate their practices against established standards and identify areas for improvement
6. Desktop review to identify key actions required from suppliers
7. Enhance supplier screening using Know Your Client (KYC) intelligence software
8. Corporate Social Compliance Audits provide a point in time, objective and independent verification process of supplier alignment with local laws and worker wellbeing standards
9. Domus 8.7 Index modern slavery statement assessment on selected suppliers in high-risk categories
10. ACAN Prequalified Supplier Directory - a list of preferred suppliers accessible to Catholic organisations

ACTIONS Undertaken:

- 143 total suppliers
- 51 suppliers in High-Risk procurement
- 47 ACAN Supplier Surveys complete
- 14 Suppliers identified for SEDEX onboarding
- 71 instances of supplier communication
- 15 suppliers completed online learning

Domus 8.7

Catholic Church Endowment Society is a founding member of Domus 8.7. Domus 8.7 was established as an agency of the Catholic Archdiocese of Sydney in 2020 as a key element of the ACAN Modern Slavery Risk Management Program. This collaborative approach to remediation is aligned with the Modern Slavery Act and Catholic Social Teaching which are centered on the needs, wellbeing and empowerment of people impacted.

Domus 8.7 provides Catholic Church Endowment Society:

- resources that enable us to listen to workers (grievance channel)
- a 24/7 careline for workers on our sites, staffed by professional counselors
- direct support to people impacted by modern slavery
- guidance and technical assistance to prevent, identify and remediate modern slavery
- a documented process to assess if an organisation has caused, contributed or is directly linked to modern slavery and modern slavery indicators

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The Modern Slavery Working Group consists of:

Sarah Moffatt	Executive Director, Pastoral Life and Mission <i>Catholic Archdiocese of Adelaide</i>
James Lloyd	Pastoral Leader, Justice, Healing and Inclusion <i>Catholic Archdiocese of Adelaide</i>
Jarden King	Manager, Governance and Quality Assurance <i>Centacare Catholic Community Services</i>
John Favretto	Director, Governance, Quality and Assurance <i>Catholic Education SA</i>

	ACTIVITY	2023	2024	2025	Notes
INTERNAL / STAFF	Hours spent on modern slavery activities	4	12	16	Hours spent on modern slavery activities
	Individual staff completed e-learning	0	0	0	Individual staff completed e-learning
	E-learning modules completed	0	0	0	E-learning modules completed
EXTERNAL / SUPPLIER ENGAGEMENT	Total number of suppliers	799	148	143	Number of suppliers
	Number of suppliers with visible contact information and ABN	0	49	103	Number of suppliers with visible contact information and ABN
	Number of suppliers across high-risk categories	121	27	51	Number of suppliers across high-risk categories
	Number of ACAN Supplier Surveys completed	63	1	34	Number of ACAN Supplier Surveys completed (cumulative)
	Supplier staff attending capacity building webinars	2	22	15	Number of Supplier staff attending capacity building webinars
	Invited to join Sedex	12	14	14	Number of suppliers invited to join Sedex (cumulative)
	Joined Sedex	0	5	6	Number of suppliers that Joined Sedex (cumulative)
	Sedex SAQ completed	0	0	2	Number of Sites with Sedex SAQ completed (cumulative)
	Social audits	0		0	Number of social audits completed in 2025
	Corrective actions	0	0	0	Number of non-conformances in 2025
DOMUS 8.7 EXTERNAL REFERRALS	Contacts made via worker voice / grievance mechanism	0	0	0	Contacts made via worker voice / grievance mechanism
	Referrals for advice and assistance	0	0	0	Referrals for advice and assistance
	Individuals identified or referred for modern slavery assessment	0	0	0	Individuals identified or referred for modern slavery assessment
	Individuals with modern slavery cases remediated	0	0	0	Individuals with modern slavery cases remediated

In 2025, the following actions have been undertaken by CCES:

- Continued active participation Modern Slavery Risk Management Program through Australian Catholic Anti Slavery Network (ACAN), in particular, engagement with Kate Hopper from ACAN.
- The Modern Slavery Working Group with members from the Archdiocesan Office, Centacare and Catholic Education, has met on 3 occasions.
- 2025 Modern Slavery Statement developed.
- Further assessment of supplier spend and associated risks.

For 2025 reporting, CCES followed the ACAN program for assessing and addressing the risk of modern slavery through the following supplier engagement plan:

- I. Identification of suppliers in high risk procurement areas via ACAN Procurement Taxonomy.
- II. Suppliers in high risk categories were invited to complete the ACAN Supplier Survey. ACAN Program Managers assessed survey results to identify:
 - suppliers with SEDEX membership
 - suppliers willing to join SEDEX
 - suppliers not required by CSPD to join SEDEX
- III. Suppliers were assisted to join SEDEX and provided support to complete the SEDEX Self Assessment Questionnaires (SAQ).
- IV. ACAN Program Managers assessed Supplier SAQ results, identified gaps in the supplier's management system such as further training, capacity building needs and development of risk management strategies.

CRITERIA 5

Continuous Improvement

Collaboration is at the heart of accelerating progress. This also includes opportunities to comparatively measure social, environmental and governance (business ethics) risks and actions with peers in our network.

In its foundational stages, Catholic Church Endowment Society used an internally devised ACAN framework to measure progress. This bespoke approach reflected the unique priorities, constraints, and practices across Catholic organisations.

In 2025, the ACAN Program adopted a globally recognised risk measurement system through SEDEX. This aligns reporting entities with a methodology that combines global data about risks in different countries and industries with site-specific information from the SEDEX platform. SEDEX regularly updates the methodology to ensure it is aligned with new and emerging risks. Therefore, completion of the SEDEX SAQ completed by Catholic Church Endowment Society is a substantial measure of continuous improvement year on year. Below is an explanation of how scoring is calculated using the SEDEX SAQ and Catholic Church Endowment Society 2025 risk scores and management controls that will serve as our benchmark for continuous improvement.

Explanation of Scoring

Combined Risk Score 0/10 - calculated from inherent risk and site characteristics, adjusted for management controls and audit results. The score is broken down by pillar and highlights strengths and opportunities to focus our efforts on key areas that drive ethical and sustainable practices.

Inherent Risk Score 0/10 - predicts potential risks based on a country/region, and sector. Spanning all four pillars, this score is broken down by topics. It can be used as a baseline to identify and prioritise areas for improvement in operations. This score shows the natural risks of doing business in a specific country or sector. It does not include any details about individual sites.

Labour Standards Pillar - assesses location and industry factors that could increase labour risks, such as vulnerable worker populations or high rates of workplace violations.

Health and Safety Pillar - considers regional and industry-specific health and safety risks, including local regulations and industry accident rates.

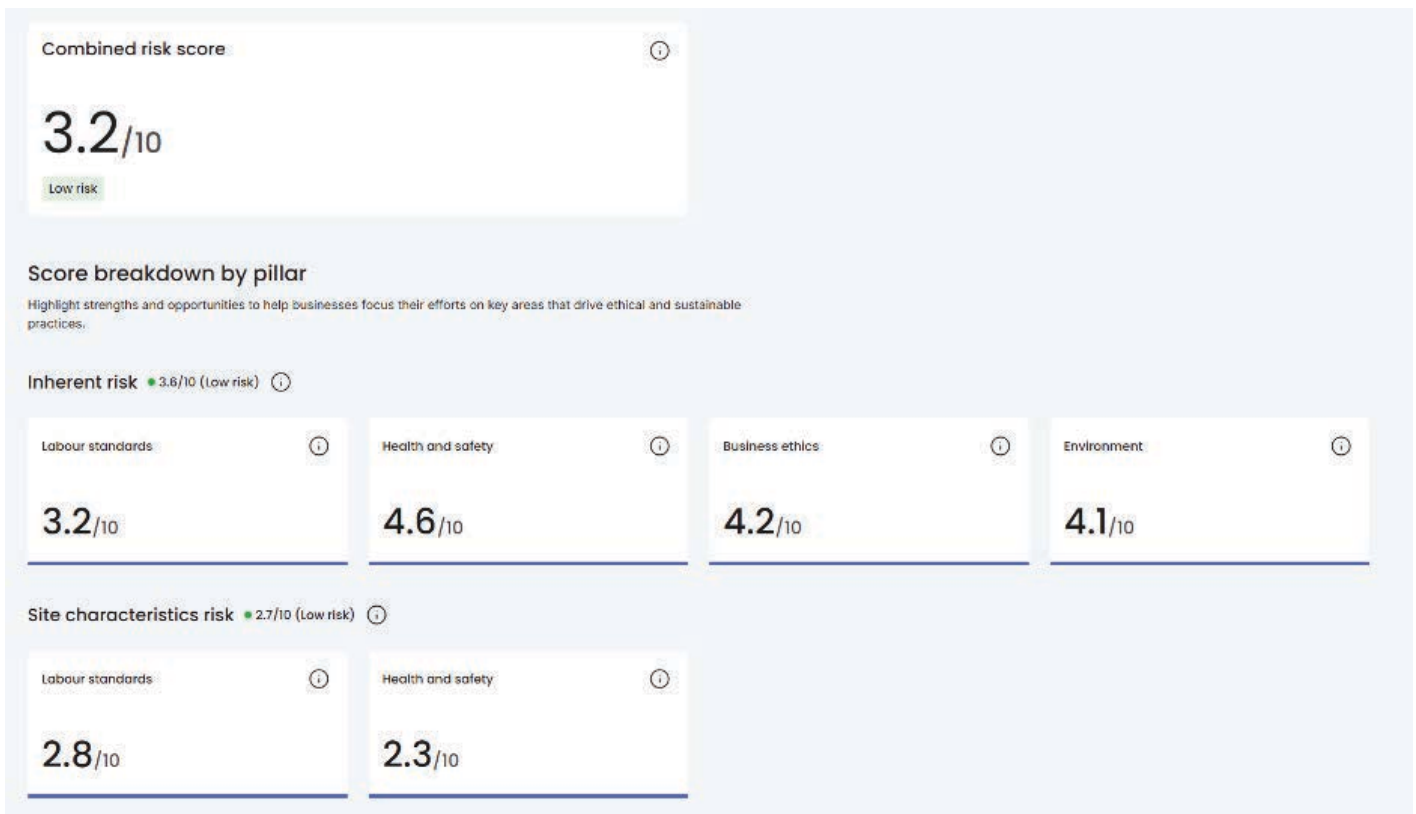
Business Ethics Pillar - assesses industry and location risks related to unethical practices, such as high corruption levels or weak regulatory oversight.

Environment Pillar - examines the environmental impact of the site's industry and location, such as pollution levels or resource use that may create regulatory or compliance risks.

Site Characteristics Risk Score 0/10 - Highlights potential risks based on your suppliers' SAQ responses in the Labour Standards and Health and Safety pillars. This score can be used to assess and support the implementation of policies and processes that mitigate workplace risks within your supply chain. For the Environment SAQ, site characteristics consider the type of work, business and location (e.g. proximity to sensitive areas). For the Core SAQs, risks are assessed based on the nature of the work, such as exposure to heavy machinery or hazardous materials.

Labour Standards - reflects labour-related risks like employment practices, workers rights and wages based on SAQ responses. High-risk activities in this area can raise the score.

Health and Safety - based on SAQ responses to questions about site-specific health and safety factors, such as equipment usage, handling of chemicals or accident risks.



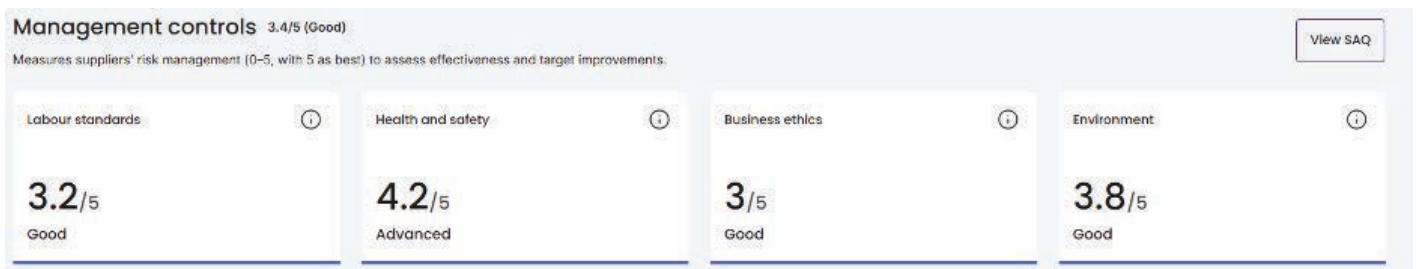
Management Controls Score 0/5 - This score measures how well policies or processes are in place to reduce the risks from the site characteristics. It is also based on answers in the SAQ. A Poor score of 0-0.9 indicates that there are few or no controls in place. An Advanced score of 4-5 indicates that there are exemplary controls that exceed compliance and drive innovation.

Labour Standards - evaluates policies and processes to ensure fair labour standards and worker protections are effectively managed.

Health and Safety - reviews the adequacy of safety protocols, emergency preparedness and training efforts to manage health and safety risks on site.

Business Ethics - evaluates controls against unethical practices such as anti-bribery policies, compliance with legal standards and transparent operations.

Environment - looks at policies managing environmental impact, resource efficiency and waste reduction practices to align with sustainability standards.



Action Plans

The following activities are planned for 2026:

- Continued invitation for staff to complete the e-learning modules on Modern Slavery
- Introduce the Modern Slavery Working Group to SEDEX, in particular, their procurement & policy.
- Continued invitation of high risk suppliers to complete the ACAN supplier survey
- Development of ethical sourcing initiatives, including further development of a contract clause for suppliers and as part of prospective new tender process.
- Continued connection with key staff from ACAN to provide ongoing support and expertise.
- Regular connection with ACAN local support.
- Through the Archdiocesan Council for Integral Ecology, continue the work of divestment options for CCES.
- Development of a supplier contract inclusion which outlines a commitment to reducing modern slavery by our supplier.

CRITERIA 6

Process of Consultation

- The Executive of the Curia determined that it would continue with producing a Modern Slavery Statement for the 2026 reporting period.
- Continued work with the Modern Slavery Working Group with members from the Archdiocesan Office, Centacare and Catholic Education. This working group has met 3 times.

CRITERIA 7

Other

As part of awareness raising activities in the Archdiocese:

- Each year the Feast of St Josephine Bakhita of South Sudan is held in St Francis Xavier's Cathedral. This important Feast Day Mass for the Patron Saint of victims of modern slavery and human trafficking; organized by the African community.
- The Archdiocese promotes ethical Easter Egg campaigns through its parishes and communities in the lead up to Easter and are promoted through social media.
- Office space provided for local ACAN employee based in Adelaide.

APPENDIX A - TIMELINE OF ACTIVITIES

2020	Joined ACAN
October 2023	Commitment from Executive of Curia to develop a Modern Slavery Statement
6th February 2025	Modern Slavery Working Group Meeting
8th April 2025	Met with Kate Hopper, Supplier Engagement Manager, ACAN
8th May 2025	In-person meeting with Sarah Moffatt and Kate Hopper, Program Manager, ACAN
22nd May 2025	Confirmation of report - Executive of Curia
4th June 2025	In-person meeting with Sarah Moffatt and Kate Hopper, Program Manager, ACAN
12th Nov 2025	In-person meeting with Sarah Moffatt and Kate Hopper, Program Manager, ACAN
13th May 2026	Modern Slavery Working Group Meeting
22nd May 2026	Confirmation of 2025 Modern Slavery Statement - Executive of Curia
26th May 2026	In-person meeting with Alison Rahill, ACAN



2025 Modern Slavery Statement

1 January 2025 - 31 December 2025

CatholicCare Tasmania
ABN 79 984 899 862
Catholic Diocesan Centre
35 Tower Road, New Town, TAS 7008
<https://catholiccaretas.org.au/>
catholiccare.hobart@aohtas.org.au

CatholicCare Tasmania operates under the legal entity of the Roman Catholic Church Trust Corporation of the Archdiocese of Hobart (Archdiocese of Hobart) and does not have separate subsidiaries or controlled entities.

Disclosure

This Modern Slavery Statement has been produced on behalf of CatholicCare Tasmania, an agency of the Roman Catholic Church Trust Corporation of the Archdiocese of Hobart. This statement covers the operations and supply chain activities of CatholicCare Tasmania for the reporting period and represents CatholicCare Tasmania's first standalone Modern Slavery Statement, following previous inclusion within the Archdiocese of Hobart's consolidated reporting.

This Modern Slavery Statement was approved by the principal governing body of CatholicCare Tasmania as defined by the *Modern Slavery Act 2018* (Cth) ("the Act") on 18 June 2026. This modern slavery statement is signed by a responsible member of CatholicCare Tasmania as defined by the Act.



Anita Cunningham
Board Chair
CatholicCare Tasmania

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From the Chair

CatholicCare Tasmania is committed to upholding the dignity and rights of all people, consistent with our mission and the principles of Catholic Social Teaching.

This statement represents our first standalone Modern Slavery Statement and marks an important step in strengthening our approach to identifying and addressing modern slavery risks within our operations and supply chains. While we continue to operate within the broader Archdiocese of Hobart framework, this work reflects our growing accountability and commitment to understanding and managing risks specific to CatholicCare Tasmania.

Throughout the reporting period, we have made progress in improving visibility over our supply chain, embedding modern slavery awareness within our organisation, and working collaboratively with the Australian Catholic Anti-Slavery Network and the Archdiocese of Hobart. We recognise that this is an evolving journey and that continuous improvement is essential.

We remain committed to building our capability, strengthening ethical procurement practices, and taking a proactive, risk-based approach to preventing modern slavery in all its forms.

Anita Cunningham
Board Chair
CatholicCare Tasmania



CRITERION 1: About Us

About CatholicCare Tasmania

CatholicCare Tasmania is the primary social services agency of the Catholic Church in Tasmania, providing wraparound support to individuals, families and communities across the state.

A wide range of services is offered to respond to real needs, strengthen wellbeing and help people move forward with hope and confidence. Services include early learning and care, child and youth services, psychology, mediation and counselling, multicultural programs, housing and homelessness, and family violence support. Support is delivered locally and shaped by the needs of the people and communities served.

Guided by the principles of Catholic Social Teaching, our work reflects a commitment to the dignity of every person, a preferential option for the poor, and the promotion of justice. Our approach to modern slavery is intrinsically linked to these values, recognising that exploitation and human trafficking are serious violations of human dignity that must be actively prevented.

Mission

CatholicCare Tasmania's Mission is to enhance the human life of people by offering the full Christian vision for human life. CatholicCare Tasmania seeks to foster a love for the poor and the vulnerable, a spirit of humble service, of mercy and compassion for all.

Values

Hope

Connection

Authenticity

Courage

CRITERION 2: Our Structure, Operations and Supply Chain

Our Corporate Structure

CatholicCare Tasmania operates as part of the Archdiocese of Hobart. The Archdiocese of Hobart is a statutory body established under the *Roman Catholic Church Property Act 1932 (Tas)*, through which the Archbishop administers the affairs of the Catholic Church in Tasmania. CatholicCare Tasmania delivers social services under the governance, financial and policy framework of the Archdiocese of Hobart.

Our Governance Framework

As an agency of the Archdiocese of Hobart, CatholicCare Tasmania operates within a broader governance structure in which the Archdiocese of Hobart acts as the legal and employing entity. The Archdiocese of Hobart provides overarching governance, policies and oversight, while CatholicCare Tasmania retains responsibility for operational service delivery. The CatholicCare Tasmania Board supports governance arrangements, with operational leadership reporting through to the Archdiocese of Hobart framework.

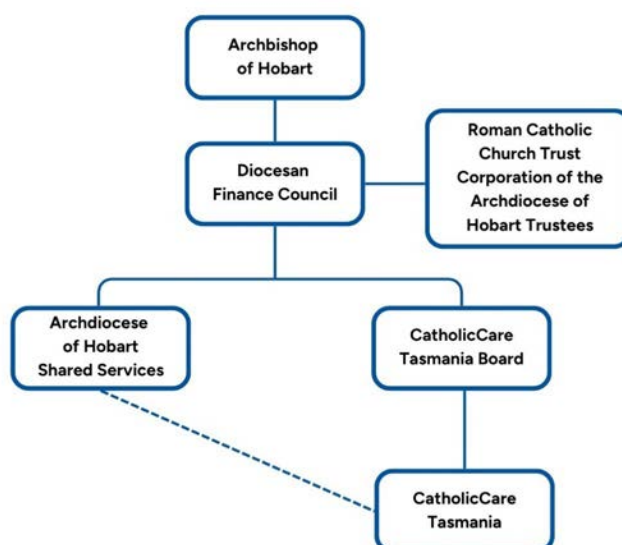
The organisation participates in the Archdiocese of Hobart Modern Slavery Act Compliance Committee (AMSACC), which:

- Develops and maintains modern slavery policies and principles
- Coordinates reporting obligations
- Supports education and awareness
- Oversees implementation of modern slavery initiatives across agencies

The AMSACC meets regularly throughout the year and reports to the Archdiocese of Hobart Executive Director Administration & Finance, with key matters escalated through governance channels as required. This shared governance structure enables a coordinated, consistent approach to modern slavery risk management across the Archdiocese of Hobart.

Modern slavery risks identified through operations or procurement can be escalated through CatholicCare Tasmania's governance and risk management processes to leaders and, where required, to the Board.

Our Organisational Structure



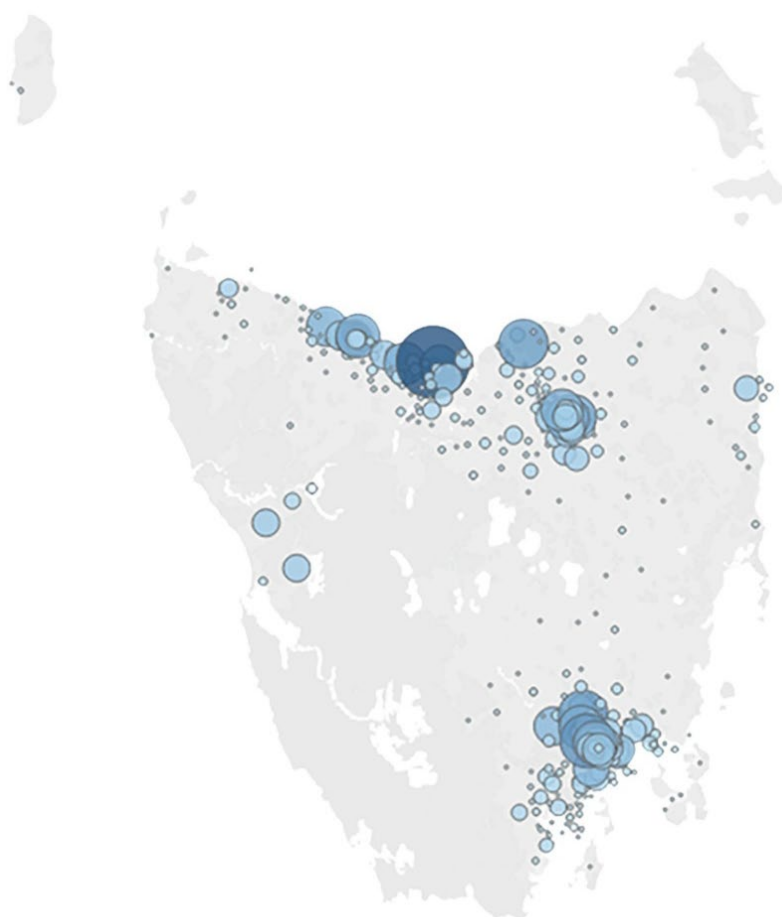
Our Operations

CatholicCare Tasmania operates through multiple service streams delivering community-based and centre-based services statewide.

CatholicCare Tasmania operates across Tasmania, delivering social services through 32 locations including offices in New Town (Head Office), Launceston, George Town, Devonport and Burnie. Services include early learning and care, child and youth services, counselling, housing and homelessness support, multicultural programs and family violence services.

CatholicCare Tasmania employs 439 staff across the state and delivers services to individuals, families and vulnerable cohorts. The workforce includes a mix of full-time, part-time and casual employees, supported by a smaller number of contractors and service providers engaged as required.

CatholicCare Tasmania's annual revenue is approximately \$48,000,000, derived primarily from funding, fee-for-service programs, and grants.



CRITERION 3: Modern Slavery Risks

Modern Slavery Risks in Operations and Supply Chain

CatholicCare Tasmania recognises that modern slavery risks may arise across both its operations and supply chains. These risks include forced labour, human trafficking, and worker exploitation, particularly within industries characterised by complex subcontracting, low-skilled labour, or vulnerable worker cohorts.

Consistent with our commitment to human rights and ethical conduct, we continue to strengthen our ability to identify, assess and manage these risks through the Archdiocese of Hobart framework and the Australian Catholic Anti-Slavery Network (ACAN).

Operational Risk

CatholicCare Tasmania's service delivery works with vulnerable cohorts, including migrants, refugees and individuals experiencing disadvantage. These groups may face increased risk of exploitation due to:

- Language barriers
- Limited awareness of workplace rights
- Social isolation
- Visa-related vulnerabilities

Accordingly, modern slavery risk management is embedded not only in procurement, but also in frontline service delivery and client engagement.

Our Supply Chain and Procurement Model

CatholicCare Tasmania operates within a shared services and governance framework of the Archdiocese of Hobart, which is central to how modern slavery risks are managed.

Archdiocese Managed Procurement

The majority of CatholicCare Tasmania's procurement activity is undertaken by the Archdiocese of Hobart, including:

- Professional services
- Insurance
- ICT systems, hardware and software
- Fleet and vehicle management
- Utilities
- Cleaning and maintenance services
- Office supplies

These arrangements are centrally negotiated and managed, with supplier due diligence, Sedex participation, and risk assessment coordinated through the ACAN program. Suppliers are assessed using the ACAN Category Risk Taxonomy and are reported within the Archdiocese of Hobart's Modern Slavery Statement.

CatholicCare Tasmania accesses these services through internal arrangements with the Archdiocese of Hobart, with associated supply chain risks managed at that level.

CatholicCare Tasmania Managed Procurement

CatholicCare Tasmania undertakes a smaller proportion of procurement directly, primarily in the following categories:

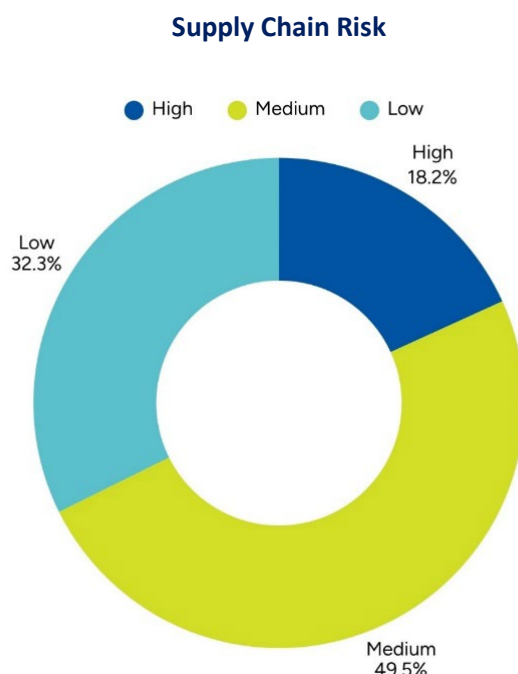
- Professional services
- Building and construction (program-specific)
- Maintenance and minor works
- Office supplies and consumables
- Food and program-related supplies

Some activities (e.g. building works and social housing-related services) may also intersect with other Archdiocese of Hobart entities such as Loreto Community Housing and St Joseph Affordable Homes, which are separately governed and reported and are subject to the same Archdiocese of Hobart framework.

Supplier mapping and spend categorisation are maturing, with further work underway to strengthen risk assessment and classification using the ACAN framework.

Our Supply Chain

CatholicCare Tasmania's supply chain is largely managed by the Archdiocese of Hobart through a shared services model. CatholicCare Tasmania directly procures a smaller range of goods and services, primarily including professional services, office supplies, and food and beverage. Tier 1 suppliers are predominantly based in Australia, with limited visibility beyond this level (Tier 2), reflecting an area for ongoing improvement in supply chain mapping and transparency.



CatholicCare Tasmania Supplier Analysis				
	Total	High	Medium	Low
Spend (\$M)	\$4,340,886	\$96,943.00	\$2,132,928	\$1,411,015
Number of Suppliers	92	21	34	37

Modern slavery risk across the supply chain is assessed using the ACAN Category Risk Taxonomy. This framework classifies risk based on the severity of potential harm to people (saliency) within specific spend categories.

The taxonomy draws on internationally recognised sources including the Global Slavery Index; the International Labour Organisation (ILO), including definitions of modern slavery; the U.S. Department of Labor’s Bureau of International Labor Affairs (ILAB); and the Global Child Forum and UNICEF; as well as risk intelligence from the Domus 8.7 remediation program.

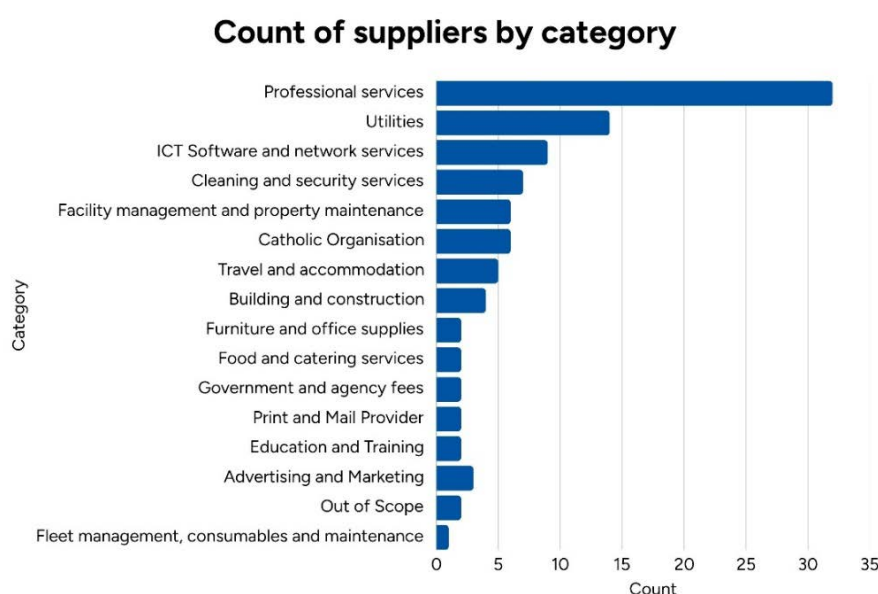
Risk levels are determined based on a combination of factors, including:

- Geography: the country or location where a good is made or service is delivered
- Industry: the sector in which the making of goods or delivery of service occurred
- Commodity: the raw materials or components that comprise the goods or products
- Workforce vulnerability: such as bonded visas, temporary migrants, women or children known to be employed in specific industry sectors
- Domus 8.7: trends, cases, and risk intelligence identified through the Domus 8.7 remediation service, including grievances and remediation insights relevant to category and risk to workers.

This framework enables a structured and consistent approach to identifying higher-risk categories across both Archdiocese of Hobart-managed and CatholicCare Tasmania-managed procurement. Based on this framework, higher-risk categories include:

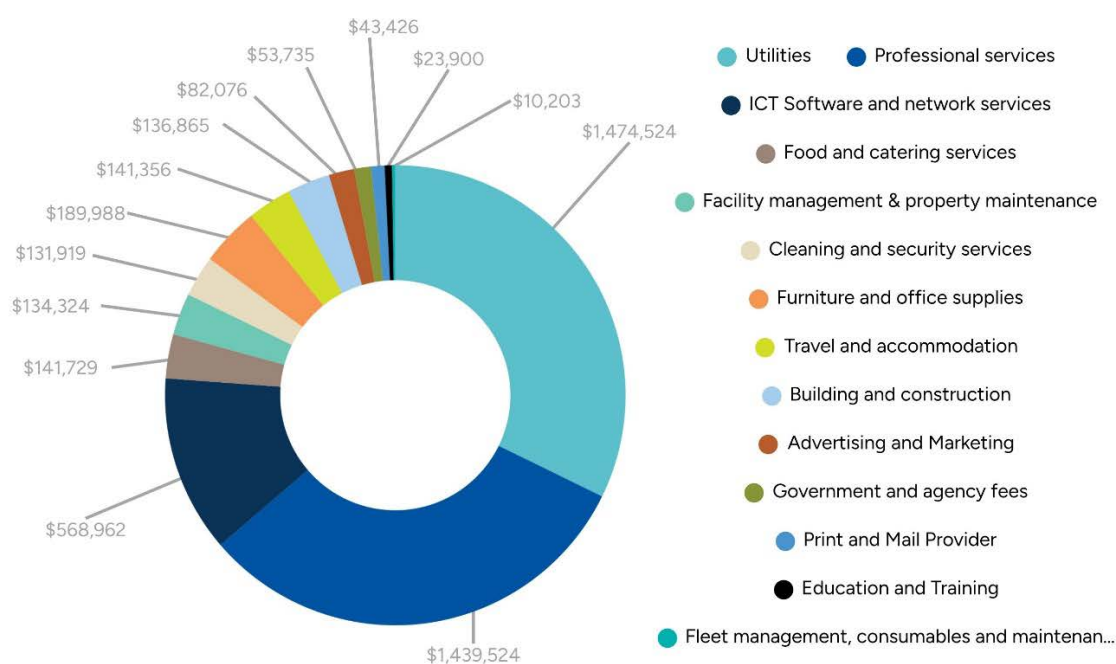
- Building and construction
- Cleaning, security and facility management services
- Labour hire and workforce-intensive services
- Food, catering and textile-related supply chains
- Logistics, transport and warehousing
- ICT hardware and offshore technology services

Medium-risk categories include areas such as professional services, utilities, travel, and fleet management, while certain categories (such as payroll and pastoral activities) are considered outside the scope of the ACAN taxonomy. The Archdiocese of Hobart applies this taxonomy to centrally managed suppliers, while CatholicCare Tasmania is progressively applying it to its directly engaged suppliers.



Our Spend Categories

CatholicCare Tasmania continues to strengthen its visibility and assessment of modern slavery risks within its directly managed supply chain and operations. The risk taxonomy across 23 categories of geographic location, industry/sector, commodity, product category and workforce profile developed by ACAN has proven a reliable tool for categorising our supply chain risk exposure in terms of high, medium and low risk. CatholicCare Tasmania continues to work closely with ACAN and prioritises engagement with higher-spend categories, particularly facility management and property maintenance, furniture and office supplies, and cleaning and security services, which represent the organisation's key areas of procurement activity.



Managing Modern Slavery Risks

CatholicCare Tasmania recognises that its approach to managing modern slavery risk is evolving within a shared services environment. While the organisation currently draws on Archdiocese of Hobart systems and processes for supplier due diligence, it is continuing to build greater visibility across its supply chain, including beyond direct (Tier 1) suppliers, and to strengthen how supplier risk information is captured and used.

To support this progression, CatholicCare Tasmania is expanding its supplier mapping and data collection, progressively applying the ACAN risk taxonomy to its directly managed suppliers, enhancing internal procurement governance, and maintaining close alignment with Archdiocese of Hobart risk management frameworks to leverage established systems and expertise.

CRITERION 4: Actions Taken to Assess and Address Risks

Approach and Governance

CatholicCare Tasmania adopts a proactive and values-based approach to preventing modern slavery, aligned with the broader Archdiocese of Hobart framework and the principles of Catholic Social Teaching.

As part of this approach, CatholicCare Tasmania participates in the AMSACC, which supports coordination of policy, education, supplier engagement and reporting activities across agencies.

CatholicCare Tasmania has adopted the Archdiocese of Hobart Modern Slavery Prevention Policy and Principles, which establish clear expectations for ethical conduct, supplier behaviour and risk management across operations and procurement.

Modern slavery risk is increasingly embedded into governance and operational processes, including procurement decision-making, internal reporting and escalation pathways, supporting a more structured and risk-based approach to identifying and managing potential exposure.

Domus 8.7

CatholicCare Tasmania participates in Domus 8.7, a key element of the ACAN Modern Slavery Risk Management Program. Domus 8.7 was established as an agency of the Catholic Archdiocese of Sydney in 2020. This collaborative approach to remediation is aligned with the Modern Slavery Act and Catholic Social Teaching, centred on the needs, wellbeing and empowerment of people impacted.

Domus 8.7 provides CatholicCare Tasmania with:

- resources that enable us to listen to workers through secure grievance channels
- a 24/7 Worker Careline staffed by professional counsellors
- direct support to people impacted by modern slavery
- guidance and technical assistance to prevent, identify and remediate modern slavery
- a structured process to assess whether an organisation has caused, contributed to, or is directly linked to modern slavery risks

Domus 8.7 supports a victim-centred approach, empowering people impacted by modern slavery to have choice and control over what forms of remediation are meaningful to them, and to engage safely with organisations across the supply chain.

Support provided may include:

- modern slavery indicator assessment
- needs assessment, case coordination, response and remediation planning
- referrals to community, social services and unions
- transport, accommodation, financial and food support
- legal support, referrals, accompaniment and advocacy
- job training, retraining and redeployment
- advocacy and support to engage with government and law enforcement agencies
- opportunities to contribute lived experience to improve responses to modern slavery

Domus 8.7 also incorporates lived experience into its governance through its Advisory Committee. It is a registered charity with the Australian Charities and Not-for-profits Commission (ACNC) and holds Deductible Gift Recipient (DGR) status.

Responsibility for modern slavery risk management is reflected in relevant governance structures and roles, including leadership oversight through Archdiocese of Hobart compliance forums. This approach aligns with Catholic Social Teaching and supports a victim-centred response to modern slavery, ensuring that remediation is informed by the needs and wellbeing of impacted individuals.

Service Delivery and Prevention

In line with our mission and ethical obligations, CatholicCare Tasmania takes a proactive approach to identifying and mitigating modern slavery risks across service delivery and operations.

Our services continue to embed modern slavery risk awareness into best practice service delivery, particularly supporting clients who may be at increased risk due to language barriers, visa related pressures, social isolation, or limited knowledge of workplace rights.

Key activities include:

- Supporting CALD and migrant clients through case management, education and coordinated engagement with employers, businesses and community services
- Client education on workplace rights, responsibilities, fair pay and options for support, particularly for those working in farming, factory and seasonal labour roles
- Appropriate job matching to ensure that employment opportunities align with clients' skills, wellbeing needs and safety considerations
- Identification and referral of potential modern slavery indicators through lawful channels

Training and Capability

CatholicCare Tasmania has launched Go1 as the new Learning Management System (LMS) within the Employment Hero platform, replacing SALT. The integration between Employment Hero as the Human Resource Information System and the LMS enables stronger training compliance and centralised record-keeping.

As part of the first release of mandatory training, all staff are required to complete the Modern Slavery Awareness online module. This module provides:

- An overview of global modern slavery concepts
- Understanding of the *Modern Slavery Act 2018* (Cth) and reporting obligations
- Awareness of organisational risks and consequences of non-compliance
- Guidance on identifying and reporting modern slavery indicators within operations and supply chains

This module forms part of CatholicCare Tasmania's new compliance training suite and must be completed within the compliance cycle. It ensures consistent understanding across the workforce and strengthens governance, ethical procurement practice and early intervention capability.

Supplier Engagement and Ethical Procurement Practices

CatholicCare Tasmania is committed to strengthening ethical procurement practices by engaging with suppliers who demonstrate alignment with modern slavery legislation and best practice frameworks.

CatholicCare Tasmania's supplier engagement approach is supported by the broader ACAN Modern Slavery Risk Management Program, which provides a structured process for assessing and engaging suppliers. Through this program, suppliers are evaluated using the ACAN Category Risk Taxonomy, supported by data collected through supplier surveys and ongoing engagement activities. This includes information on supplier size, workforce profile, sourcing locations, and existing modern slavery controls, including Sedex membership.

ACAN Supplier Engagement

In 2025, ACAN introduced a purpose-built data management platform, ROTA, which centralises the ACAN Risk Management Program framework and facilitates supplier performance evaluation and engagement.

Through the ACAN program, supplier engagement includes:

1. Evaluation of modern slavery risk within operations and supply chains using the ACAN Risk Taxonomy
2. Supplier surveys to collect data on revenue, workforce size, sourcing locations, workforce arrangements, and Sedex membership status
3. Supplier education on modern slavery and risk management, particularly across higher-risk sectors such as cleaning, construction, labour hire, and sourcing of goods from overseas
4. Onboarding of suppliers to the Sedex platform
5. Completion of Sedex Self-Assessment Questionnaires (SAQs) to support supplier self-evaluation
6. Desktop reviews to identify key actions required from suppliers
7. Enhanced supplier screening using Know Your Client (KYC) intelligence tools
8. Independent social compliance audits to assess alignment with legal and worker welfare standards
9. Domus 8.7 Index assessment of selected high-risk suppliers' modern slavery statements
10. Access to the ACAN Prequalified Supplier Directory to support ethical procurement decisions

As part of this approach, CatholicCare Tasmania prioritises procurement, where possible, from organisations that:

- Are reporting entities under the *Modern Slavery Act 2018* (Cth), or
- Maintain publicly available Modern Slavery Statements, or
- Have established policies, processes and governance frameworks to identify, assess and mitigate modern slavery risks within their operations and supply chains

Examples in the 2025 reporting period include:

- **Employment Hero (Human Resource Information System)**
Employment Hero maintains a Modern Slavery Statement outlining its commitment to identifying and addressing risks across its operations and supply chain. This includes due diligence processes, supplier expectations, and ongoing risk monitoring.
- **Go1 (Learning Management System)**
Go1 similarly demonstrates a commitment to preventing modern slavery through published policies and procedures, including supplier engagement practices and risk mitigation strategies

By engaging with suppliers who have established modern slavery frameworks, CatholicCare Tasmania:

- Strengthens its overall supply chain integrity
- Leverages supplier due diligence and risk management processes
- Promotes shared accountability for ethical practices
- Reduces exposure to modern slavery risks through informed procurement decisions

This approach complements the broader Archdiocese of Hobart procurement framework and supports CatholicCare Tasmania's transition toward increased visibility and management of its directly controlled suppliers.

Where practicable, consideration is given to a supplier's modern slavery risk management approach as part of procurement decision-making, particularly for new systems, services, and high-value engagements.

These activities represent an early step toward embedding modern slavery risk controls into CatholicCare Tasmania's procurement and purchasing practices.

Where applicable, supplier agreements incorporate modern slavery expectations, consistent with the Archdiocese of Hobart procurement and contract management framework. These requirements are considered in new contracts and supplier engagements, supporting alignment with modern slavery obligations.

External Partnerships and Initiatives

CatholicCare Tasmania also continued to deepen partnerships and undertake targeted initiatives, including:

- Maintaining a working relationship with My Blue Sky / Antislavery Australia
- Scoping a Train-the-Trainer program on forced marriage awareness for local CALD communities
- Participating in PALM Scheme stakeholder engagement and data collection with the Department of Employment and Workplace Relations
- Ongoing involvement in the Red Cross-led Support for Trafficked People Network
- Delivering a work rights and obligations session for PALM Visa workers in northern Tasmania
- Ensuring any procurement practices include an assessment of modern slavery compliance

Advocacy and Awareness

Participation in Anti-Poverty Week 2025 highlighted the link between poverty, vulnerability and the risk of exploitation, reinforcing CatholicCare Tasmania's commitment to addressing the root causes of modern slavery.

CatholicCare Tasmania partnered with community organisations to deliver public awareness activities in Launceston and Hobart, engaging with the community and promoting collaborative, place-based responses. Events included community stalls and speakers from peer organisations, highlighting the challenges facing vulnerable cohorts across the state.

These activities reinforced the social conditions that can increase vulnerability to exploitation, including financial insecurity, social isolation and limited access to support. CatholicCare Tasmania remains committed to advocating for systemic change and supporting safe, dignified and equitable outcomes for all.

Future Focus and Continuous Improvement 2026

CatholicCare Tasmania is committed to strengthening its independent capability to identify and manage modern slavery risks. Key actions include:

1. Sedex Self-Assessment
 - CatholicCare Tasmania will complete its Sedex Self-Assessment Questionnaire (SAQ)
 - This will support benchmarking of ethical sourcing practices and identify gaps for improvement
2. Building Organisational Capability
 - Increase staff awareness and training in modern slavery risks
 - Expand participation in ACAN facilitated learning and guidance
 - Build internal knowledge and ownership of modern slavery risk management
3. Strengthening Procurement Visibility
 - Develop a clearer picture of CatholicCare Tasmania-controlled suppliers
 - Categorise suppliers using ACAN risk taxonomy
 - Improve data collection for future reporting
4. Embedding Governance and Accountability
 - Strengthen integration of modern slavery considerations into:
 - Procurement processes
 - Contract management
 - Risk management framework
5. Supplier Engagement (Future Phase)
 - Begin engagement with CatholicCare Tasmania-controlled suppliers
 - Explore opportunities for supplier onboarding into:
 - ACAN processes
 - Sedex platform

Case Study: Risk-Informed Procurement Decision-Making

CatholicCare Tasmania considered modern slavery risk as part of the selection of key operational systems, including Employment Hero and Go1. As part of this process, publicly available Modern Slavery Statements and supplier policies were reviewed to assess each provider's approach to managing risks within their operations and supply chains.

This approach supported informed procurement decision-making by prioritising suppliers with established modern slavery risk management frameworks, including due diligence processes, supplier expectations, and ongoing monitoring activities.

This example demonstrates how modern slavery considerations are beginning to be embedded into procurement practices, contributing to stronger supply chain integrity and alignment with ethical sourcing principles.

CRITERION 5: Assessing Effectiveness

CatholicCare Tasmania is committed to continuously improving the effectiveness of its modern slavery risk management framework. As this is the organisation's first standalone Modern Slavery Statement, the 2025 reporting period establishes a baseline for CatholicCare Tasmania-specific measurement, while continuing to leverage system-level insights from the Archdiocese of Hobart.

In 2025, the ACAN Modern Slavery Risk Management Program adopted a globally recognised risk measurement system through Sedex. This enables participating entities to measure risk and management controls using a consistent, data-driven methodology that combines global risk data with supplier-specific information.

Measuring Effectiveness

Sedex Risk Measurement and Continuous Improvement

Completion of the Sedex Self-Assessment Questionnaire (SAQ) represents a key step in strengthening CatholicCare Tasmania's approach to measuring modern slavery risk and continuous improvement. Sedex provides a structured scoring system across risk and management controls, enabling organisations to benchmark performance and identify priority areas for action.

Risk scores are assessed across four pillars:

- Labour Standards
- Health and Safety
- Business Ethics
- Environment

These scores consider:

- Inherent risk based on industry and geographic exposure
- Site-specific characteristics based on supplier responses
- The effectiveness of management controls in mitigating those risks

Management control scores assess the extent to which policies, processes, and practices are in place to address identified risks, providing a measurable indicator of organisational maturity.

Program Metrics (2025 Baseline)

	Activity	2025 CatholicCare Tasmania
Internal / Staff	E-Learning modules completed	0
	Total number of suppliers	92
External / Supplier Engagement	Number of suppliers across high-risk categories	20
	Number of ACAN Supplier Surveys completed	8
	Suppliers Identified for Sedex onboarding	3
	Sedex SAQ completed	1

These metrics demonstrate early-stage but measurable integration of modern slavery risk management into business-as-usual activities.

The 2025 reporting period represents a significant improvement from prior years, where supplier risk visibility, formalised data collection and structured measurement tools were not in place at the agency level.

The Archdiocese of Hobart's 2024 reporting demonstrates significant progress in supplier visibility, engagement and risk assessment, including:

- Increased identification of suppliers and improved data completeness
- Expansion of supplier engagement through ACAN surveys
- Participation in Sedex and completion of supplier self-assessment questionnaires
- Growth in training and awareness activities across staff and suppliers

CatholicCare Tasmania is establishing a baseline to measure effectiveness, including:

- Implementation of mandatory modern slavery training modules for all staff
- Integration of modern slavery awareness into service delivery practices
- Initial identification of directly procured suppliers and spend categories
- Participation in governance forums such as AMSACC
- Strengthening internal systems through the introduction of the Employment Hero and Go1 platforms

CatholicCare Tasmania is progressively embedding modern slavery considerations into governance and operations, including supplier risk assessments and procurement decision-making. Effectiveness of embedding modern slavery risk management is demonstrated through:

- Inclusion of modern slavery awareness within staff training and induction processes
- Consideration of supplier modern slavery practices as part of procurement and purchasing decisions
- Participation in cross-agency governance and reporting structures
- Integration of modern slavery risk awareness into client-facing programs and service delivery

As procurement visibility improves, additional metrics will be developed to measure:

- Supplier engagement and due diligence activities
- Inclusion of modern slavery clauses in contracts
- Uptake of supplier risk assessment tools (e.g. ACAN surveys, Sedex)

CatholicCare Tasmania uses ACAN baseline data, including the end-of-year data pack, to benchmark performance, identify gaps and inform priority actions. Archdiocese of Hobart reporting currently informs baseline metrics. These metrics provide a comparative view of supplier engagement, training, Sedex uptake and grievance activity.

Over time, CatholicCare Tasmania will expand its internal data collection to enable more direct measurement of agency-level performance.

Continuous Improvement

CatholicCare Tasmania adopts a continuous improvement approach informed by ACAN baseline data, Sedex risk measurement, and insights from the Archdiocese of Hobart framework.

Key areas of focus and development include:

- Transition from consolidated Archdiocese of Hobart reporting to agency-level visibility and accountability
- Establishment of baseline data across supplier spend categories and risk classification
- Strengthening internal awareness and training capability
- Increased focus on CatholicCare Tasmania-controlled procurement activities
- Development of systems and processes to support ongoing tracking, monitoring and reporting

These foundational steps reflect a shift toward a more proactive, structured and data-informed approach to identifying and managing modern slavery risks and will support continuous improvement in future reporting periods.

Grievance and Remediation Pathways

CatholicCare Tasmania has access to the Archdiocese of Hobart grievance and remediation framework, including referral pathways through Domus 8.7 via the ACAN program.

In addition:

- Staff are trained to identify and escalate indicators of exploitation through appropriate internal and external channels
- Service delivery teams support vulnerable individuals who may be at risk of modern slavery
- Established partnerships (e.g. Anti-Slavery Australia, Red Cross) support referral and response pathways

During the reporting period:

- No confirmed instances of modern slavery or indicators were identified through supplier engagement, staff reporting, or service delivery channels
- No formal remediation cases were required at the CatholicCare Tasmania level

CatholicCare Tasmania recognises that the absence of reported incidents does not eliminate risk and will continue to strengthen detection and reporting mechanisms.

Future Reporting

CatholicCare Tasmania will continue to refine how effectiveness is measured by:

- Aligning internal metrics with ACAN reporting frameworks
- Using Supplier Survey and Sedex data (as participation increases)
- Monitoring training completion and engagement rates
- Tracking supplier risk categorisation and engagement activities

CatholicCare Tasmania will establish the following initial targets:

- ≥80% of suppliers assessed through ACAN surveys or Sedex within three years
- 100% staff completion of mandatory modern slavery training annually
- Inclusion of modern slavery clauses in 100% of relevant contracts

Over time, this will enable a more data-driven, transparent and accountable approach to managing modern slavery risks.

Together, these measures demonstrate that CatholicCare Tasmania's modern slavery risk management framework is transitioning from foundational implementation to measurable and increasingly embedded practice.

CRITERION 6 – Internal Consultation

Consultation Approach

CatholicCare Tasmania recognises that effective modern slavery risk management requires collaboration across all areas of the organisation. As a standalone reporting entity, CatholicCare Tasmania has initiated a more structured approach to internal consultation to ensure that modern slavery risks and responsibilities are integrated, understood, identified and managed across the organisation and its operations.

Archdiocese of Hobart Collaboration

CatholicCare Tasmania continues to participate in the AMSACC, which provides a forum for consultation across Archdiocese of Hobart agencies and entities.

Through participation in AMSACC, CatholicCare Tasmania contributes to and benefits from:

- Shared policy development and guidance
- Coordination of reporting obligations
- Cross-agency awareness and education initiatives
- Knowledge sharing on supplier engagement and risk mitigation

This forum ensures alignment with the broader Archdiocese of Hobart framework while supporting CatholicCare Tasmania's transition to agency-level accountability.

Internal Divisional Consultation

Consultation has been undertaken with key internal stakeholders to support the development of this Modern Slavery Statement and to strengthen organisational awareness. This consultation has informed both the identification of risks and the development of actions outlined in this statement.

CRITERION 7 – Other Information

CatholicCare Tasmania's Multicultural Programs

These programs also support the identification and mitigation of modern slavery risks within vulnerable cohorts, as outlined in Criterion 3.

CatholicCare Tasmania offers various multicultural programs and services aimed at supporting individuals from diverse backgrounds and helping them integrate into the Tasmanian community. Our client cohort are at increased risk of experiencing forms of modern slavery due to challenges such as low literacy, education or English language skills; visa requirements; lack of awareness of work rights or safe work conditions; limited support networks; lack of access to reliable information; and due to racism and discrimination.

Our programs focus on providing assistance with settlement, employment, and social inclusion, and are delivered in partnership with other organisations. Specifically, multicultural programs include:

Multicultural Service Programs (MSP):

MSP provides support to individuals from multicultural backgrounds to help them feel a sense of belonging and participate confidently in society. This includes support for various visa holders such as humanitarian entrants and those on temporary protection visas.

Multicultural Employment Services (MES):

MES offers tailored support to help new arrivals from multicultural backgrounds overcome barriers to employment, education, or training. CatholicCare Tasmania helps with job searching, resume writing, interview preparation, and pathways to further education and training.

Settlement Engagement and Transition Support (SETS):

SETS is a program that supports refugees and migrants in their settlement journey.

These programs are designed to be inclusive and to foster a sense of community for people from all backgrounds. They also emphasise the importance of community support and collaboration in helping individuals thrive in their new environment. CatholicCare Tasmania remains active and engaged in this area in relation to its clients and raising awareness.



1800 819 447 catholiccaretas.org.au

MODERN SLAVERY STATEMENT

1 January 2025 - 31 December 2025



Catholic
Education
Tasmania



Blooming by Luana Towney



Catholic Education Tasmania acknowledges the deep connection to Country and Culture of the traditional custodians of this place, the Pakana Palawa of Lutruwita, and Tasmanian Aboriginal Communities and pay our respect to Elders past and present.

We acknowledge our role in nurturing and supporting the next generation of young Aboriginal and Torres Strait Islander Tasmanians. We are committed to learning alongside the children we teach in this place, and the communities we form a part of, to support the continued sharing of knowledge and Culture.

Disclosure Note

This Statement has been produced on behalf of Catholic Education Tasmania. This Statement covers all Archdiocesan Schools under the authority of the Tasmanian Catholic Education Office for the reporting period 1 January 2025 to 31 December 2025.

Since the commencement of the Modern Slavery Act 2018 (Cth), the activities of the Tasmanian Catholic Education Office, to meet the regulatory compliance of our organisation, were reported under the Roman Catholic Church Trust, Archdiocese of Hobart, Modern Slavery Statements.

Tasmanian Catholic Education Office
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New Town, Tasmania, 7008
E: ceo@catholic.tas.edu.au
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Contact: cieadmin@catholic.tas.edu.au

Approval and Signature

As Chair of the Catholic Education Tasmania Commission, I am pleased to present Catholic Education Tasmania's Modern Slavery Statement for 2025. We recognise that modern slavery remains a significant global challenge that requires collective and sustained action.

Our Commission is committed to upholding the dignity of every person and to acting with integrity, transparency and respect in all that we do. We take seriously our responsibility to identify, address and minimise the risks of modern slavery within our operations and supply chains. This commitment reflects not only our regulatory obligations, but also our broader responsibility to the communities we serve.

We are continuing to strengthen our governance, procurement practices and partnerships to ensure that ethical conduct underpins our decision-making. We remain firmly committed to continuous improvement and to supporting efforts that protect vulnerable people and foster just outcomes.

This Modern Slavery Statement was approved by the Catholic Education Commission Tasmania, principal governing body of the Tasmanian Catholic Education Office and Schools as defined by the Modern Slavery Act 2018 (Cth) ("the Act") on 11 June 2026.



A handwritten signature in blue ink, appearing to read 'Kathryn Westwood'.

Kathryn Westwood

Chair
Catholic Education Commission Tasmania

Approval and Signature

As Executive Director, I am proud of the steps Catholic Education Tasmania is taking to address modern slavery risks and embed ethical practices across our operations.

Modern slavery is a complex and evolving issue, and we are committed to playing our part in preventing exploitation in all its forms. Guided by our values, we seek to ensure that the people impacted by our work—directly or indirectly—are treated with dignity and fairness.

This includes strengthening our internal policies, working closely with suppliers and partners, and raising awareness among our staff of the role they play in identifying and addressing risk.

Our approach is grounded in accountability, collaboration, and continuous improvement. By integrating modern slavery considerations into our everyday business practices, we aim to contribute to safer, fairer, and more inclusive communities.

This Modern Slavery Statement was signed by a responsible member of the Tasmanian Catholic Education Office as defined by the Modern Slavery Act 2018 (Cth) (“the Act”) on 29 May 2026.



A handwritten signature in black ink, appearing to read 'Terry McCarthy'.

Terry McCarthy

Interim Executive Director
Catholic Education Tasmania

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Criterion 1

About Catholic Education Tasmania

Child Safe Communities

Catholic Education Tasmania believes that children and young people have a fundamental right to be respected, nurtured, cared for, and that every child and young person is entitled to be educated in a safe environment.

Catholic Education Tasmania has zero tolerance for abuse, harm, and neglect and is committed to the protection of children and young people from all forms of abuse, harm, and neglect.

Catholic Education Tasmania is committed to the alignment of its child safety program with the National Principles for Child Safe Organisations.

Our Vision and Mission

Catholic Education Tasmania provides student focused, Christ-centred learning for life, with a mission to form the whole person—intellectually, physically, morally, and spiritually. Dedicated to the evangelical mission of the Church, Catholic Education Tasmania aims to foster growth in wisdom, knowledge, prayer, and holiness within a community that values faith, learning, and care.



This statement has been made on behalf of Catholic Education Tasmania and is prepared pursuant to Section 134 of the Modern Slavery Act 2018 (Cth).

The following organisations are covered under this Modern Slavery Statement:

Central Office

Tasmanian Catholic Education Office ABN 55 210 770 582

Schools

Corpus Christi Catholic School ABN 61 097 642 154
Guilford Young College ABN 76 019 833 993
Holy Rosary Catholic School ABN 75 092 701 811
Immaculate Heart of Mary Catholic School ABN 76 620 874 983
John Paul II Catholic Primary School ABN 44 049 110 657
Larmenier Catholic Primary School ABN 17 465 270 592
Mackillop Catholic College ABN 89 094 211 541
Marist Regional College ABN 60 165 188 918
Mount Carmel College ABN 32 359 023 154
Our Lady of Lourdes Catholic School ABN 68 416 731 625
Our Lady of Mercy School ABN 89 892 817 584
Sacred Heart College ABN 36 205 940 483
Sacred Heart Catholic School (Geeveston) ABN 12 223 562 136
Sacred Heart Catholic School (Launceston) ABN 87 361 757 372
Sacred Heart Catholic School (Ulverstone) ABN 94 448 741 301
St Aloysius Catholic College ABN 41 300 940 448
St Anthony's Catholic School ABN 11 317 538 056
St Brendan-Shaw College ABN 64 137 590 249
St Brigid's Catholic School (New Norfolk) ABN 94 743 620 170
St Brigid's Catholic School (Wynyard) ABN 22 182 779 426
St Cuthbert's Catholic School ABN 61 571 914 083
St Finn Barr's Catholic School ABN 85 668 818 546
St James Catholic College ABN 45 240 090 480
St John's Catholic School ABN 29 599 894 790
St Joseph's Catholic School (Queenstown) ABN 22 380 630 458
St Joseph's Catholic School (Rosebery) ABN 86 751 886 993
St Mary's College ABN 70 118 296 643
St Patrick's Catholic College ABN 87 092 083 980
St Patrick's Catholic School ABN 83 243 281 322
St Paul's Catholic School ABN 91 439 681 183
St Peter Chanel Catholic School ABN 11 902 907 409
St Therese's Catholic School ABN 42 361 686 522
St Thomas More's Catholic School ABN 39 185 389 074
Star of the Sea Catholic College ABN 95 621 969 049
Stella Maris Catholic School ABN 24 165 090 763

Achievement Framework

Catholic Education Tasmania Leadership have developed an Achievement Framework—represented as 11 domains and aligned with the domains in our Strategic Priorities—to remind us of our Catholic educational mission and the role that each of us plays in it.

With the Achievement Framework comes a set of goals aligned with each of the 11 domains. At the heart of the Framework are six key enablers for educational change, surrounded by supporting domains that underscore the breadth of our efforts. It's a roadmap that connects our daily work to the larger goal, emphasising the importance of each task and initiative.



Criterion 2

Our Structure, Operations and Supply Chains

Governance Framework

Catholic Education Tasmania is an agency established by the Roman Catholic Church Trust Corporation of the Archdiocese of Hobart to oversee the operation and management of Catholic schools in Tasmania.

The Trust Corporation, established under the Roman Catholic Church Property Act 1932 (as amended), has delegated authority to the Catholic Education Commission Tasmania and the Executive Director of Catholic Education Tasmania, enabling them to govern and manage Catholic education, including funding responsibilities as the approved authority.

The Catholic Education Centre (ABN 55 210 770 582), operating as the Tasmanian Catholic Education Office, is a registered charity with the Australian Charities and Not-for-profits Commission (ACNC). It complies with all relevant governance and financial reporting obligations, maintaining appropriate constitutional documents, and adhering to legislation related to insurance, employment, child safety, and school registration.

As the approved authority, the Catholic Education Commission Tasmania provides oversight of both the Tasmanian Catholic Education Office and school operations, ensuring compliance with ACNC and government regulations. The Commission is responsible for setting policy, ensuring funding is applied appropriately for educational purposes, and meeting the requirements of the Australian Education Act 2013. It has a role in providing high-quality Catholic education underpinned by strong governance, regulatory compliance, and a commitment to the holistic development and wellbeing of all students.

Standing Committees

Supporting the responsibilities of the Catholic Education Commission Tasmania are two standing committees: the Resources and Sustainability Standing Committee and the Catholic Identity and Evangelisation Standing Committee. The Standing Committees and supporting sub-committees and working groups provide strategic advice on matters pertaining to curriculum development, auditing, risk mitigation, and financial management, ensuring quality reporting and compliance with statutory and regulatory requirements.

Educational and Office Services

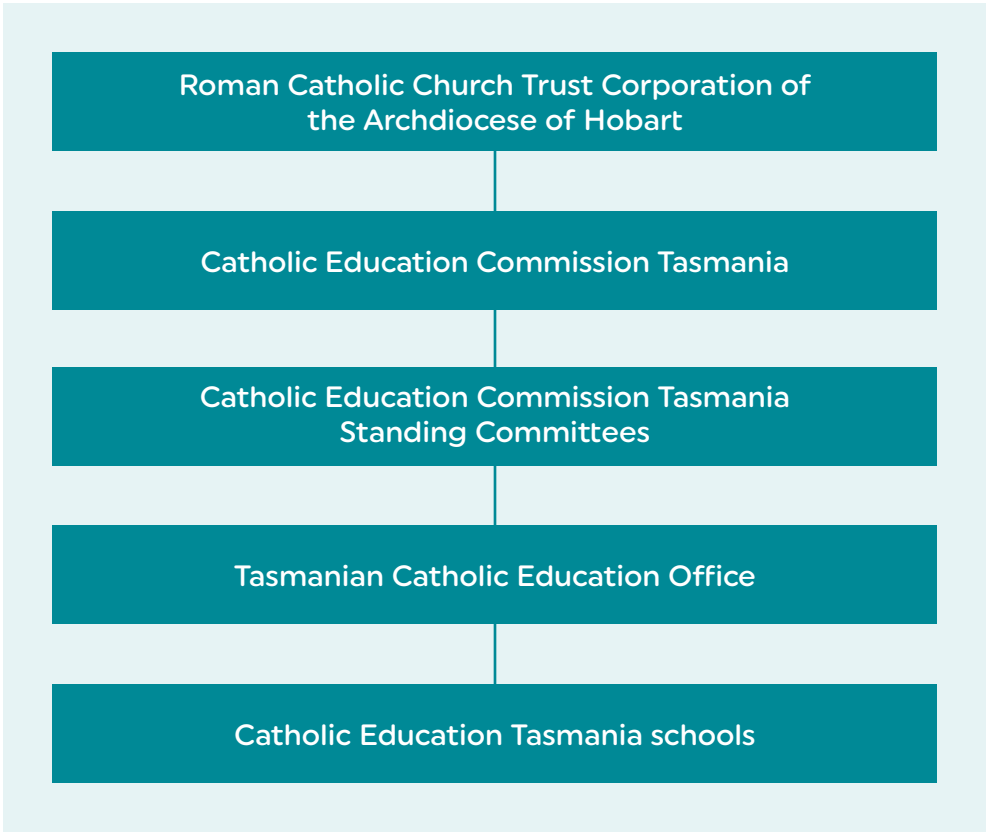
In line with its charitable purpose, Catholic Education Tasmania delivers Early Years, Primary, Secondary, and Senior Secondary education across Tasmania through a network of Catholic schools, focusing on the holistic development of students intellectually, physically, morally, and spiritually, and meeting national curriculum and educational standards.

Catholic Education Tasmania supports and operates 38 Catholic schools across the state, providing education to 17,322 students. In 2025 there were 2,957 employees covered by this report.

Staff are based at the head office in New Town, with regional offices in Launceston and Ulverstone, and across all school sites. To support operations, Catholic Education Tasmania maintains a range of long-term supply arrangements, including professional services, uniform supply, maintenance, ICT, educational materials, and construction, as well as short-term arrangements for educational services, food and beverage, and other operational needs, ensuring efficient and effective delivery of services across the system. Overall, Catholic Education Tasmania plays a central role in providing high-quality Catholic education underpinned by strong governance, regulatory compliance, and a commitment to the holistic development and wellbeing of all students.

The Modern Slavery body of work undertaken within Catholic Education Tasmania reports into the Leadership Team. From 2026 this will also report into the Resources and Sustainability and the Catholic Identity and Evangelisation Standing Committees, and through to the Catholic Education Commission Tasmania.

Governance Chart



Our Operations

The head office for Catholic Education Tasmania—the Tasmanian Catholic Education Office—is located at 5 Emmett Place, New Town, Tasmania 7008, and serves as the central administrative body supporting the Catholic Education Tasmania system of schools.

The annual consolidated revenue for the Tasmanian Catholic Education Office and schools covered by this Statement was \$383 million in 2025.

Working in close collaboration with the Archdiocese of Hobart and a range of relevant agencies and partners, Catholic Education Tasmania is committed to delivering high-quality, student-focused education grounded in Catholic values. Its work supports the provision of holistic, Christ-centred learning for life, serving the educational, spiritual, and personal development needs of students across Tasmania.

Enrolments span all year levels from Kindergarten to Year 12. The enrolment cohorts for 2025 were:

- Kindergarten: 1,124 students
- Primary (P-6): 7,952 students
- Secondary (7-10): 6,173 students
- Senior Secondary (11-12): 2,073 students

Consistent with statewide trends, enrolments of students from English as an Additional Language or Dialect (EALD) backgrounds continued to grow significantly in 2025. In 2025, there were 1,275 identified EALD students.

Catholic Education Tasmania also serves 1,688 Aboriginal and Torres Strait Islander students. As a result, 2025 marked a period of strengthened system structures, enhanced clarity of accountability, and a deeper embedding of Aboriginal and Torres Strait Islander perspectives across Catholic Education Tasmania. This included the completion of the draft Aboriginal and Torres Strait Islander Education Strategic Plan, which builds on recommendations from a 2023 independent review conducted by Deakin University and the University of Tasmania.

The review examined opportunities to improve educational outcomes, cultural responsiveness, and accountability for Aboriginal and Torres Strait Islander students.

In supporting the growing enrolment of students from refugee and asylum seeker backgrounds, Catholic Education Tasmania engaged in ongoing formalised discussions with service providers and strengthened partnerships to enhance school-based professional learning opportunities.

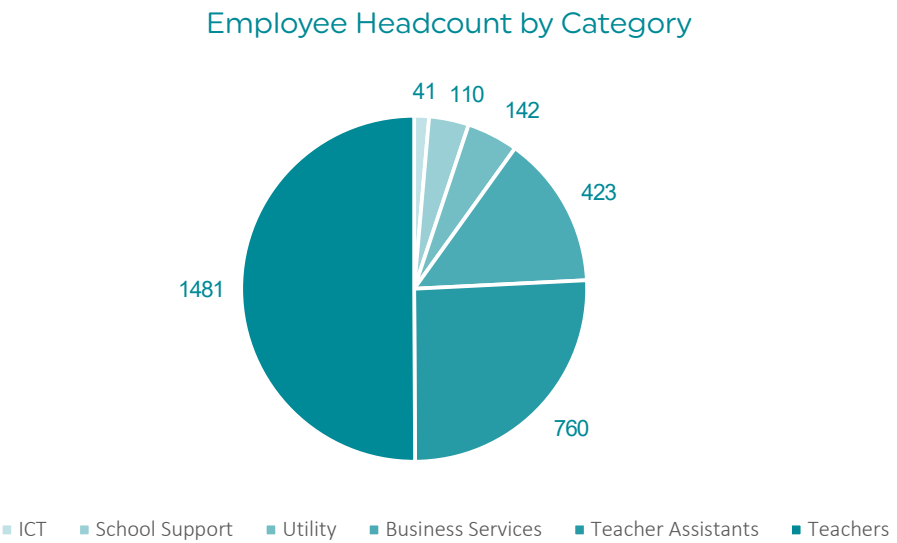
Throughout 2025, there was a strong focus on embedding sustainable systems, increasing cultural visibility, and ensuring that funding, planning, and reporting were closely aligned with measurable student achievement and wellbeing outcomes. Through strong partnerships, effective governance, and a shared mission, Catholic Education Tasmania continues to play a vital role in ensuring that Catholic education in Tasmania thrives, fostering inclusive learning environments that nurture the growth, wellbeing, and success of every student.

Distribution of Tasmanian Catholic Schools



Number of Direct Employees and Workforce Profile

Approximately 150 centralised staff provide strategic, operational, and professional support to 38 Catholic schools across Tasmania. The total number of direct employees within Catholic Education Tasmania schools for 2025 was 2,957.



Our Supply Chain

Where possible, Catholic Education Tasmania is committed to supporting local businesses and prioritises procurement from Australian-domiciled suppliers. This approach reflects a strong commitment to strengthening local economies, fostering community partnerships, and ensuring reliable and sustainable supply chains.

Catholic Education Tasmania undertakes the procurement of a broad range of goods and services necessary to support the effective operation of its schools and administrative functions. These include, but are not limited to:

- Building and construction
- Facility management and property maintenance
- Finance and Investment
- Furniture and office supplies
- Events and event management
- Food and catering services
- School resources and sporting equipment
- Cleaning and Security Services
- License / membership fees
- ICT Hardware
- Waste management services
- Labour Hire

Through its procurement practices, Catholic Education Tasmania aims to ensure value for money, quality service delivery, and compliance with relevant legislative and ethical standards, while maintaining a clear focus on supporting local and Australian suppliers wherever practicable.

Criterion 3

Modern Slavery Risks in Operations and Supply Chains

Risk Assessment

Catholic Education Tasmania is a member of the Australian Catholic Anti-Slavery Network (ACAN) and actively utilises the resources and guidance provided through this collaboration to identify, monitor, and address risks of modern slavery within its operations and supply chains. As part of this commitment, Catholic Education Tasmania applies the ACAN Category Risk Taxonomy, a structured classification framework used to assess and define modern slavery risks across different categories of expenditure. This taxonomy enables Catholic Education Tasmania to evaluate the severity of actual or potential harm to people associated with its procurement activities and to prioritise areas requiring enhanced due diligence and mitigation strategies.

The ACAN Category Risk Taxonomy is informed by globally recognised and evidence-based sources including:

- The Global Slavery Index
- The International Labor Organisation (ILO), including definitions of modern slavery
- The Bureau of International Labor Affairs (ILAB), U.S Department of Labor
- The Global Child Forum and UNICEF

Through the application of these internationally recognised benchmarks and tools, Catholic Education Tasmania strengthens its capacity to promote ethical supply chains, enhance transparency, and uphold its commitment to safeguarding human rights across all aspects of its operations.

Five key factors are also used to determine the level of risk:

- **Geography:** the country or location where a good is made or service is delivered.
- **Industry:** the sector in which the making of goods or delivery of service occurred.
- **Commodity:** the raw materials or components that comprise the goods or products.
- **Workforce vulnerability:** such as bonded visas, temporary migrants, women or children known to be employed in specific industry sectors.
- **Domus 8.7:** trends, cases, and risk intelligence identified through the Domus 8.7 remediation service, including grievances and remediation insights relevant to category and risk to workers.



Operational Risks

Catholic Education Tasmania recognises that, while its core operations are based primarily within Tasmania and Australia, there remains a risk of modern slavery within its workforce and day-to-day-activities.

Key operational risks areas include:

- **Labour hire and contracted services:** Engagement of third-party labour, including cleaning, maintenance, construction, and security services, presents a heightened risk where workers may be employed under vulnerable or indirect arrangements.
- **Workforce vulnerability:** While Catholic Education Tasmania directly employs staff under Australian workplace laws, there is potential exposure to vulnerable cohorts within contracted or support services, including temporary migrant workers, visa holders, or lower-paid workers in outsourced services.
- **Decentralised operational environment:** The operation of 38 schools across multiple locations increases complexity in oversight, creating potential risks in the consistent application of procurement, contracting, and ethical employment practices at a local level.
- **Child safety and student-related environments:** As an education provider, Catholic Education Tasmania maintains heightened vigilance around safeguarding children and young people, recognising the intersection between exploitation risks and vulnerable populations.
- **Procurement delegation and local purchasing:** School-level purchasing and autonomy may introduce variability in supplier selection processes, increasing the risk that suppliers engaged at a local level have not been fully assessed for modern slavery risks.
- **Construction and capital works:** Capital projects undertaken across schools may involve subcontracting layers, increasing exposure to industries known to carry higher modern slavery risks.

High Risk	Medium Risk	Low Risk
• Building and construction • Cleaning and security • Events and event management • Facility management and property maintenance • Finance and investment • Food and catering services • Furniture and office supplies • ICT hardware • ICT software and network services- offshore • Labour hire • Linen, laundry and textile products • Medical devices and supplies • Transport, logistic and warehousing • Uniforms and PPE • Waste management services	• Advertising and Marketing • ICT software and network services- onshore • Utilities • Fleet management, consumables and maintenance • Travel and accommodation • Print/Mail provider	• Professional services • Financial expenses • Government and agency fees • License/membership fees

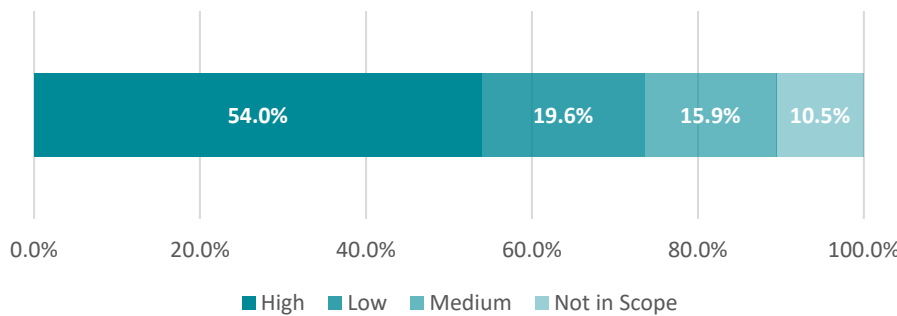
Catholic Education Tasmania continues to strengthen controls, oversight, and guidance across these operational areas to ensure alignment with ethical standards and to mitigate the risk of modern slavery across all aspects of its activities. During 2025 Catholic Education Tasmania reviewed and modified its accounting chart of suppliers to include the ACAN taxonomy against each supplier to improve reporting.

Supply Chain Risks

Across all schools and kindergartens, Catholic Education Tasmania engages with a broad and diverse supply chain, comprising more than 2,847 suppliers, with a total expenditure of approximately \$97 million in 2025. In assessing modern slavery risks within its operations and procurement activities, Catholic Education Tasmania has undertaken a comprehensive analysis using the ACAN Category Risk Taxonomy, identifying potential risks across 25 distinct spending categories.

Spend Analysis

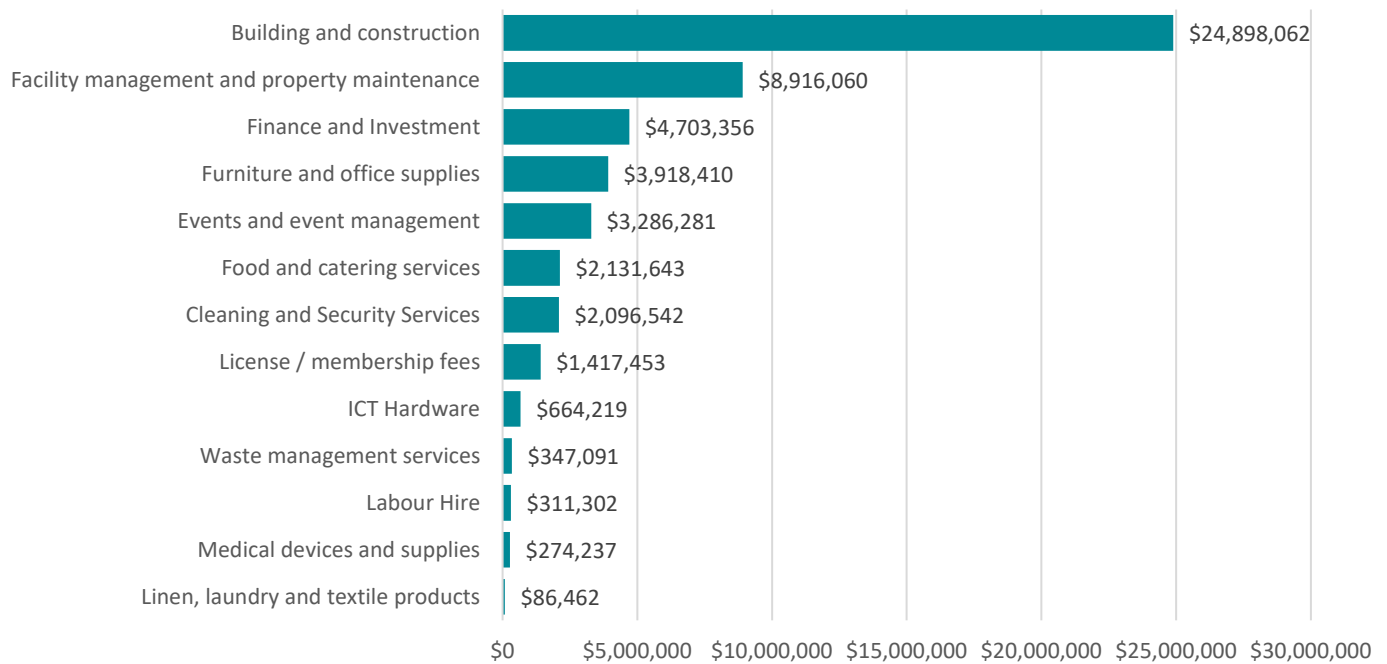
Percentage of spend per taxonomy risk category



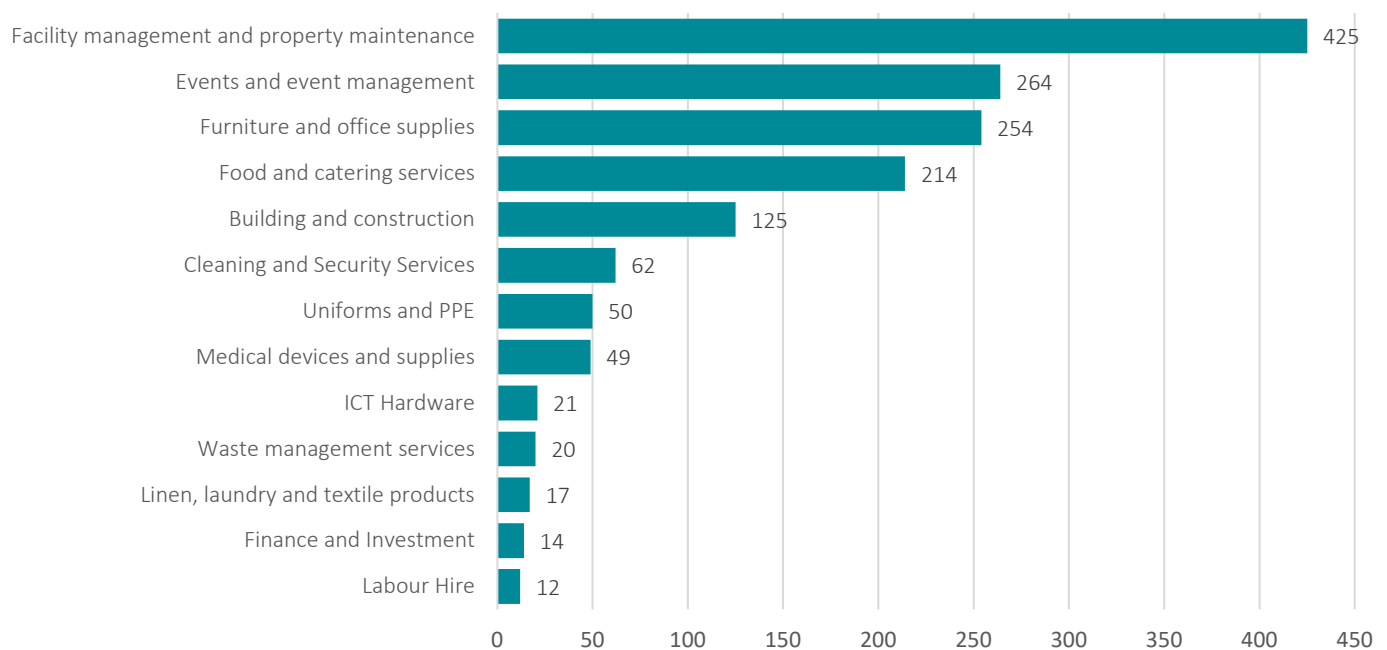
This analysis indicates that a significant proportion of Catholic Education Tasmania’s procurement activity is associated with elevated risk areas, with approximately 54% of total spend occurring within categories classified as high risk for modern slavery. These high-risk categories involve engagement with 1,525 suppliers and account for an estimated total spend of approximately \$52 million. This highlights the importance of ongoing due diligence, supplier engagement, and risk mitigation strategies within Catholic Education Tasmania’s procurement framework.



Total Spend – 2025 by ACAN Taxonomy



Number of Supplier Business Entities – 2025 by ACAN Taxonomy



Catholic Education Tasmania continues to strengthen its approach to identifying and addressing modern slavery risks by enhancing transparency across its supply chains, prioritising ethical sourcing practices, and embedding responsible procurement principles into its operations, ensuring alignment with both legislative obligations and organisational values.

Criterion 4

Steps Taken to Assess and Address Modern Slavery Risk

Supplier Engagement

Catholic Education Tasmania continues to be supported by ACAN in strengthening its approach to supplier engagement and modern slavery risk management. Through this partnership, Catholic Education Tasmania benefits from ACAN's structured programs, tools, and data, which enable a systematic and comprehensive assessment of supply chain risks. A key development in this area in 2025 has been the introduction of ACAN's purpose-built data management platform, ROTA, which centralises the ACAN Risk Management Program framework and supports consistent monitoring, supplier performance evaluation, and ongoing engagement activities such as:

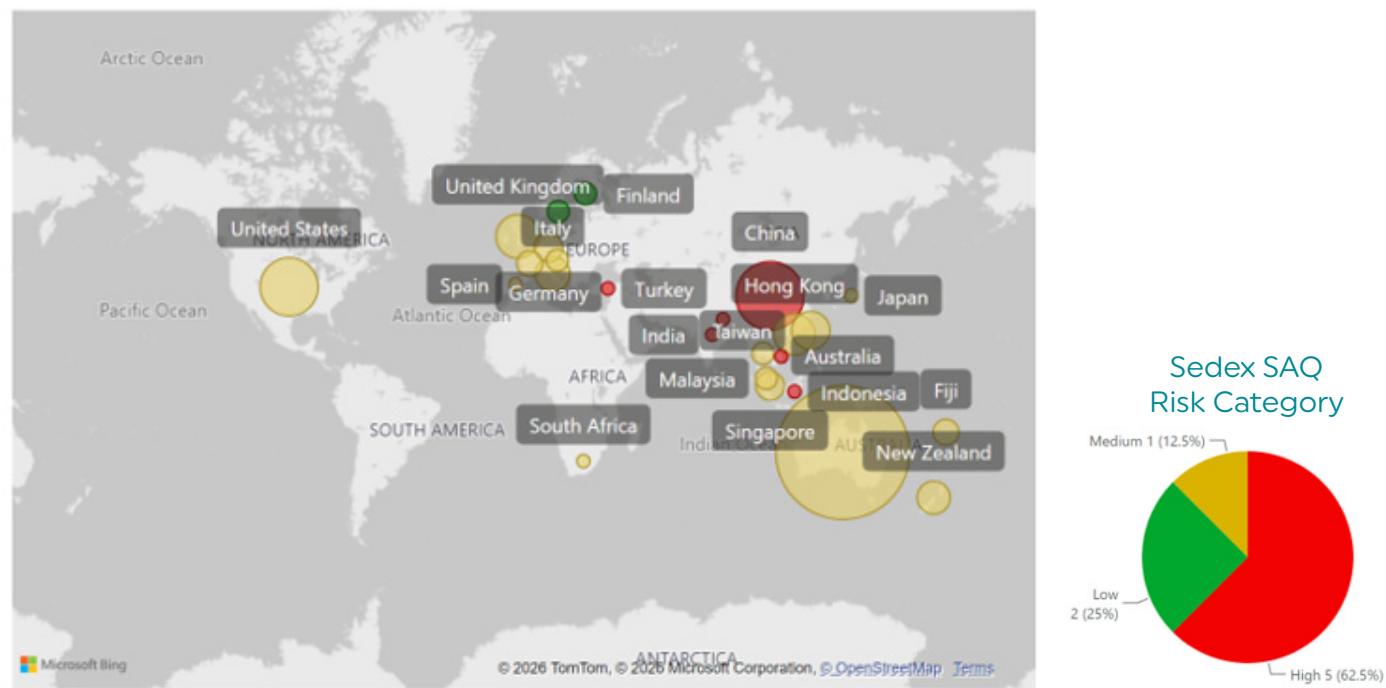
1. Evaluation of the modern slavery risk within operations and supply chains, using the ACAN Risk Taxonomy.
2. ACAN Supplier Survey to identify supplier revenue, number of employees, countries of origin for goods sourced overseas, workforce contractual arrangements, and Sedex membership status.
3. Supplier education on modern slavery and risk management in key areas: cleaning, building and construction, procurement of labour, labour hire and services, sourcing goods from overseas, grievance mechanisms and remediation.
4. Onboarding suppliers to Sedex requires a business address, contact details and goods or services provided.
5. Sedex Self-Assessment Questionnaire (SAQ) helps suppliers to evaluate their practices against established standards and identify areas for improvement.
6. Desktop review to identify key actions required from suppliers.
7. Enhance supplier screening using Know Your Client (KYC) intelligence software.
8. Corporate Social Compliance Audits provide a point in time, objective and independent verification process of supplier alignment with local laws and worker wellbeing standards.
9. Domus 8.7 Index modern slavery statement assessment on selected suppliers in high-risk categories.
10. ACAN Prequalified Supplier Directory- a list of preferred suppliers accessible to Catholic organisations.

With the support of ACAN's supplier engagement processes, Catholic Education Tasmania increased supplier awareness and participation in modern slavery risk mitigation initiatives.

In 2025, a total of 465 contractors participated in the ACAN supplier survey process, demonstrating growing engagement across Catholic Education Tasmania's supplier base. Of these, 63 suppliers further strengthened their commitment to ethical supply practices by joining Sedex, a global platform that facilitates transparent supply chain management and responsible sourcing. Catholic Education Tasmania has also maintained its membership with Sedex through ACAN during the reporting period, reinforcing its commitment to continuous improvement in supply chain transparency and accountability. Building on this progress, Catholic Education Tasmania will continue to expand its engagement strategies with additional high-risk suppliers, utilising the ACAN survey process and associated tools to deepen supplier understanding, improve compliance, and reduce modern slavery risks.

Supplier Engagement Overview

Sourcing Countries for Tier 1 Suppliers



Total Suppliers
2,847
ACAN Supplier Surveys Completed
465
Suppliers Identified for Sedex Onboarding
63
Supplier Communication
1,964
Audits in 2025
1
Suppliers on Sedex
20

Suppliers in High Risk Procurement Categories
1,525
ACAN Suppliers Surveys Completed in 2025
220
Supplier e-Mail Shared
544
Suppliers Completing e-Learning
22
Audit Findings in 2025
4
SAQs Completed
5

Supplier Screening - ACAN Collated

Enhanced 3rd Party Supplier Screening
529

3rd Party Supplier Screening High and Medium Risk
25

Employment Practices

Catholic Education Tasmania is committed to ensuring compliance with the Fair Work Act, applicable employment awards, and collective agreements governing its directly employed workforce. This compliance is achieved through the implementation of a comprehensive framework of policies, procedures, and practices designed to promote fair, safe, and equitable working conditions across all areas of Catholic Education Tasmania operations.

In particular:

- Code of Conduct
- Child Safety policies
- Work Health and Safety Policy
- Working with Vulnerable People Policy
- Workplace Behaviour
- Recruitment and Selection

Labour related services are managed by the Catholic Education Tasmania People Services function, which is staffed by qualified People Services professionals who advise managers and supervisors with regards to labour needs. People Services professionals are also present on all Tasmanian Catholic Education Office, School Principal, Deputy Principal, Business Manager and Finance Officer recruitment and guide the process in accordance with policy, enterprise agreement requirements and applicable legislation.

Labour service providers must meet the standards set by Catholic Education Tasmania and undergo formal due diligence screening to ensure that their practices conform to requirements, with a documented rating and selection criteria based on Catholic Education Tasmania's own performance requirements. Labour service providers undergo regular reviews and receive feedback on where improvements are required.

Employee Awareness and Training

Modern slavery was also a key focus of the regional Corporate Services Workshops held in July, attended by 114 school Principals, Finance Officers, and relevant staff involved in procurement and supplier engagement. These sessions provided a structured overview of modern slavery risks, including forced labour, human trafficking, sexual exploitation, domestic servitude, child exploitation, and forced criminal activity. The workshops emphasised that modern slavery can occur across a range of industries relevant to Catholic Education Tasmania operations and supply chains, including agriculture, fashion, IT, sporting goods, domestic services, and online environments. Guidance was provided on the role of schools in preventing and responding to modern slavery risks, including promoting ethical procurement practices, engaging with suppliers in a responsible manner, leveraging ACAN resources, reinforcing child safety protocols, supporting community awareness, and encouraging participation in Modern Slavery 101 training.

Policy and Contractual Enhancements

Catholic Education Tasmania has strengthened its approach to mitigating modern slavery risks by incorporating specific modern slavery clauses within key governance and procurement frameworks. This includes the integration of modern slavery provisions into the new credit card policy, reinforcing expectations around ethical purchasing and supplier selection, as well as within capital works contracts, ensuring that contractors and subcontractors adhere to modern slavery compliance requirements. These measures support increased accountability and transparency, and embed responsible procurement practices across both operational spending and major project delivery.

Domus 8.7

Catholic Education Tasmania is a founding member of Domus 8.7. Domus 8.7 was established as an agency of the Catholic Archdiocese of Sydney in 2020 as a key element of the ACAN Modern Slavery Risk Management Program. This collaborative approach to remediation is aligned with the Modern Slavery Act and Catholic Social Teaching which are centered on the needs, wellbeing and empowerment of people impacted.

Domus 8.7 provides Catholic Education Tasmania with:

- Individual online grievance channel and outreach materials that enable us to listen to workers.
- A 24/7 careline for workers on our sites, staffed by professional counsellors.
- Direct support to people impacted by modern slavery.
- Guidance and technical assistance to prevent, identify and remediate modern slavery.
- A documented process to assess if an organisation has caused, contributed or is directly linked to modern slavery and modern slavery indicators.

Domus 8.7 empowers people impacted by modern slavery to have choice and control over what forms of remediation are meaningful to them and to engage safely with business/supply chain actors. Supports may include:

- modern slavery indicator assessment,
- needs assessment, case coordination, response and remediation planning,
- referrals to community, social services, unions,
- transport, accommodation, financial and food support,
- legal support, referrals, accompaniment and advocacy,
- job training, retraining and redeployment, and
- accompaniment and advocacy to engage with government and law enforcement agencies opportunities to contribute lived expertise to improve modern slavery responses.

The Domus 8.7 Advisory Committee Members also include a person with lived expertise, Mr Moe Turaga. Domus 8.7 is a registered charity with the Australian Charities and Not-for profits Commission (ACNC) and is an endorsed Public Benevolent Institution with Deductible Gift Recipient (DGR) status: ABN 244 72497189



Criterion 5

Effectiveness of Steps Taken Under Criterion 4

Continuous Improvement

Collaboration is at the heart of accelerating progress. This also includes opportunities to comparatively measure social, environmental, and governance (business ethics) risks and actions with peers in our network.

In its foundational stages, Catholic Education Tasmania used an internally devised ACAN framework to measure progress. This bespoke approach reflected the unique priorities, constraints, and practices across Catholic organisations.

ACAN baseline data

The ACAN baseline data table provides a comparative measure of supplier engagement and program activities to measure progress and inform future action planning.

	Activity	Catholic Education Tasmania
Internal / Staff	Hours spent on modern slavery activities	80
	Individual staff completed e-learning	2143
	E-learning modules completed	2143
External / Supplier Engagement	Total number of suppliers	2847
	Number of suppliers across high-risk	1525
	Number of ACAN Supplier Surveys	465
	Supplier staff attending capacity building webinars	22
	Invited to join Sedex	63
	Joined Sedex	20
	Sedex SAQ completed	5
	Social audits	1
	Corrective actions	4
	Contacts made via worker voice / grievance mechanism	33
Domus 8.7 External Referrals	Referrals for advice and assistance	0
	Individuals identified or referred for modern slavery assessment	0
	Individuals with modern slavery cases remediated	0

Our Plans for 2026

To strengthen our mitigation strategies and enhance our overall response to modern slavery risks, the following initiatives are being developed and implemented throughout 2026:

- We will continue progressing the **Modern Slavery Communication Action Plan**, ensuring consistent and effective communication across the organisation and within Catholic Education Tasmania schools.
- To build staff awareness and understanding, **awareness campaigns** will be conducted. These campaigns aim to educate staff and school communities on identifying, preventing, and responding to modern slavery risks.
- A comprehensive **modern slavery training program** will be continued. All new employees complete the ACAN training *Modern Slavery 101*, this includes both Catholic Education Tasmania Office staff and all 38 schools. Existing staff will be encouraged to refresh their learning via this program that supports staff in recognising risks, understanding obligations, and applying best practices in their roles.
- A review of existing Catholic Education Tasmania suppliers will also be undertaken, with the goal of **reducing and consolidating suppliers** where appropriate to allow for stronger oversight and management.
- We will further leverage the **Sedex (ACAN program) platform** to identify, assess, and monitor suppliers that may present potential modern slavery risks or red flags. Alongside this, we will maintain and strengthen our partnership with ACAN, seeking ongoing guidance through their resources, webinars, and compliance support programs.
- Investigate opportunities within ACAN's **preferred suppliers** to ensure continued engagement, accountability, and alignment with our ethical sourcing expectations.
- **Monitor continuous improvement and management controls** by completing the Sedex self-assessment questionnaire.



Criterion 6

Consultation with Owned or Controlled Entities

Catholic Education Tasmania has continued to strengthen awareness and capability in identifying and addressing modern slavery risks across its workforce, school communities, and supplier interactions. During 2025, all new employees participating in the Catholic Education Tasmania induction program were provided with access to Modern Slavery e-learning modules, ensuring a consistent baseline understanding of obligations, risk indicators, and appropriate responses.

Oversight and governance of specific modern slavery initiatives were maintained through reporting to the Catholic Identity and Evangelisation Standing Committee, with the Diocesan Finance Council previously providing oversight of Catholic Education Tasmania's reporting under the Archdiocese of Hobart, ensuring continued visibility, accountability, and alignment with specific organisational priorities.



Criterion 7

Any Other Relevant Information

Catholic Education Tasmania's commitment to the integral formation of its employees, and the children and young people in its schools, helps create an anti-slavery educational response that aims to form the whole human being—mind, will, conscience, relationships, work, civic responsibility, and spiritual purpose—around the truth that every person has intrinsic and transcendent dignity.

Catholic Education Tasmania's approach to the learning and formation of employees and students is grounded in the belief that dignity is the foundation of Catholic social teaching and is explicitly tied to Jesus' words that what is done to "the least" is done to Him, and that no human authority can remove, negate, or abuse that dignity without just cause, and that this principle underlies social equality and inalienable rights.

Catholic Education Tasmania's commitment to the integral formation of children and young people means that its educational response is not limited to information about trafficking or exploitation, rather, it is committed to form people to recognise that slavery is a direct contradiction of the dignity of the human person and of the Christian view of 'being human', therefore teaching both the moral truth and the historical consequences of that truth.

For employees, Catholic Education Tasmania's commitment to integral formation supports a response to modern slavery that is:

- **Conscience-forming**, forming its employees to judge labour exploitation, coercion, and human trafficking as violations of human dignity and natural law.
- **Socially responsible**, forming its employees to participate in civil society, use democratic means, and support legal and institutional remedies that protect the vulnerable and oppose unjust systems.
- **Practically committed**, forming its employees to connect ethics with action in the workplace, business, and community, since Catholic social teaching insists that workers' dignity, just treatment, and humane conditions must be defended.
- **Globally aware**, nurturing a culture of awareness and solidarity with the poor and marginalised throughout the world, through positive action in education, law, and institutions to address conditions that can lead to indentured servitude and exploitation.

Catholic Education Tasmania continues its commitment to the systematic and ongoing system-supported, school-level formation in Catholic faith and life of all employees, including an annual student-free day for Catholic school communities in July designated to the ongoing formation of employees. System-support for schools with designing and facilitating the day of formation of their staff includes the provision of frameworks, practical guidance and resources developed by the National Catholic Education Commission that emphasise the spiritual awareness, theological understanding, and vocational motivation needed to maintain the Christ-centred mission and identity of Catholic educational communities. Catholic Education Tasmania has adopted Five Pillars that guide the integral formation of all employees and underpins the ongoing formation and learning to mitigate issues such as modern slavery.

The Pillars are:

1. **Foundations in Faith:** Building theological and spiritual literacy.
2. **Hospitality:** Fostering inclusive and welcoming communities for all people.
3. **Relevant and Engaging:** Applying practical, meaningful approaches to modern challenges.
4. **Personal Transformation:** Encouraging growth in spiritual and vocational awareness.
5. **Encouraging Witness:** Inspiring individuals to live out the Gospel message through service.

Catholic Education Tasmania's commitment to the integral formation continues to inform its curriculum and approach to the Religious Education and faith formation of students, assisting them to develop the inner strength needed to resist cultural forces that normalise domination, consumerism, and dehumanisation. Catholic schools do this by emphasising the formation of children and young people oriented to contribution, transcendence, and religion—rather than merely material or ego-comparative goals.

It recommends strong peer groups, heroic witness, and credible intellectual reasons for faith so that young people can stand against cultural pressure. In the context of modern slavery, this means helping students to:

- recognise human trafficking and exploitation as offenses against persons, not just crimes or social problems;
- develop empathy and moral courage to defend peers and strangers who are vulnerable;
- see education as part of liberation.

Moreover, Catholic Education Tasmania’s approach to the integral formation of students also gives anti-slavery education a positive vision: not only saying “no” to slavery, but saying “yes” to human dignity, vocation, family, education, just work, solidarity, and the common good. This approach is grounded in Religious Education and faith formation and service-learning that emphasises the Church’s social teaching, structured around the dignity of the person, the common good, the universal destination of goods, subsidiarity, participation, and solidarity, and it is application of these principles across education for the sanctity of human life, family life, work, economics, politics, international life, and peace. The structure provided by the Catholic social teaching principles ensures that the approach to modern-slavery education is both comprehensive and integrated.

Specifically, with the Good News for Living Religious Education curriculum **Skills for Living Achievement Strand** assist students to develop the skills at each Year Level to:

‘See’ modern slavery as a violation of human dignity.

‘Judge’ it morally using natural law and Catholic social teaching.

‘Act’ through law, education, work, civic participation, and solidarity, and persevere with courage, against cultural pressures and influences.

Some examples of school-level initiatives in 2025, supported by the Catholic Identity and Evangelisation Team of the Tasmanian Catholic Education Office, include the presentations made to Year 9 students at Marist Regional College, Burnie, as a part of their learning in a Religious Education unit focused on social justice, and, similar presentations on Catholic Social Teaching and modern slavery facilitated for Year 10 students (approximately 150 students) at St Brendan-Shaw College, Devonport, as a part of their annual retreat program.



Using the 'see, judge and act' approach, the first part of the presentations examined the facts and statistics related to slavery in our world today as well as some case studies that enable students to reflect on the impact of modern slavery, especially on our regional "neighbours". Each session culminated with students considering and then engaging in discussion with their peers about the practical decisions and actions they can make and do as consumers to help prevent slavery in the fashion, coffee, and chocolate industry; and the positive impact they can make for others by changing their attitudes, choices, and behaviours. One action they were encouraged to do is to share with their families and peers about this important issue- in this way a wider group of members of the school community are potentially informed and inspired to act by making responsible consumer choices.

Also in 2025, a group of young people (16 – 30 years of age) from Catholic schools and parishes from the Archdiocese of Hobart, consisting of approximately 100 young Tasmanians, along with clergy and staff from the Archdiocese of Hobart, Tasmanian Catholic Education Office, and Catholic schools, participated in the Australian Catholic Youth Festival in Melbourne, providing them with the opportunity to attend workshops on modern slavery in the fashion industry and visit the ACRATH stall at the EXPO.



Catholic
Education
Tasmania

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Christ Centred
Learning for Life

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LORETO
COMMUNITY HOUSING

2025 MODERN SLAVERY STATEMENT

1 January – 31 December 2025

Loreto Community Housing
ABN: 23 154 824 969
2-4 Paice Street, Bridgewater, TAS, 7030
LCH.org.au

Leadership Statement on Modern Slavery

We recognise that modern slavery remains a real and significant risk within global supply chains. As an organisation, we are committed to conducting our operations responsibly and taking reasonable, proportionate steps to identify and address modern slavery risks where they may arise.

This commitment is reflected through everyday actions including how we engage suppliers, make procurement decisions, and raise awareness across our workforce. These activities support transparency, informed decision-making, and continuous improvement. Leadership expects all our employees and partners to act ethically, speak up about concerns, and contribute to a culture where respect for human rights is part of how we do business. By embedding these principles into our regular activities, we strengthen our collective ability to reduce risk and meet our obligations under the Modern Slavery Act 2018.

Disclosure

This statement has been produced on behalf of Loreto Community Housing Limited. This statement covers Loreto Community Housing as an entity controlled by the Roman Catholic Church Trust Corporation of the Archdiocese of Hobart. This Modern Slavery Statement was approved on 18 June 2026 and is signed by a responsible member of Loreto Community Housing Ltd as defined by the Act.



A handwritten signature in white ink, appearing to be "Cody Burdon".

Cody Burdon
Chief Executive Officer
Loreto Community Housing

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Criterion 1

Loreto Community Housing (LCH) is committed to maintaining and continuously improving its systems and processes to prevent, identify and address the risk of modern slavery and human rights violations within its operations, supply chains, services and programs.

LCH recognises that modern slavery can take many forms, including forced labour or services, domestic and sexual servitude, child labour, bonded labour, debt bondage, deceptive recruitment practices, forced or servile marriage, human trafficking, workplace abuse and other slave-like practices. In this statement, the terms modern slavery and human trafficking refer collectively to these forms of exploitation.

LCH is committed to delivering affordable and sustainable housing in a responsible and ethical manner and does not tolerate any form of modern slavery within its operations or supply chains.

About Us

LCH is a work of the Catholic Church and the largest provider of community housing in Tasmania.

Since establishment in 2014, LCH has grown to support 6868 tenants across 3232 homes. Our current housing portfolio includes social and affordable housing, rapid re-housing, and crisis/transitional housing. We are also the exclusive statewide provider of the Landlord Incentive Program.

We have inhouse maintenance and property development teams and offer support programs that improve tenant and community wellbeing. We also deliver programs that focus on building participant's skills and capacity - including Inspiring Future Leaders and Build Up Tassie.

2024/25 Financial Year



3232

Homes owned
and managed



6868

Tenants



27

Local
Government
Areas



189

Homes completed
construction

Our Operations

LCH is a community housing provider that delivers affordable and social housing and related tenancy services within Australia. LCH's operations primarily involve the management of residential properties, support services to tenants, maintenance of properties and the delivery of new housing stock.

All of this is underpinned by administrative, corporate and property-related functions. These operations are Tasmanian based and are supported by a workforce comprising directly employed staff.

To deliver its services, LCH engages a range of suppliers, contractors and service providers, including for property maintenance, cleaning, construction, information and communications technology, professional services and fleet management. LCH does not operate overseas and does not directly employ workers in high-risk foreign jurisdictions.



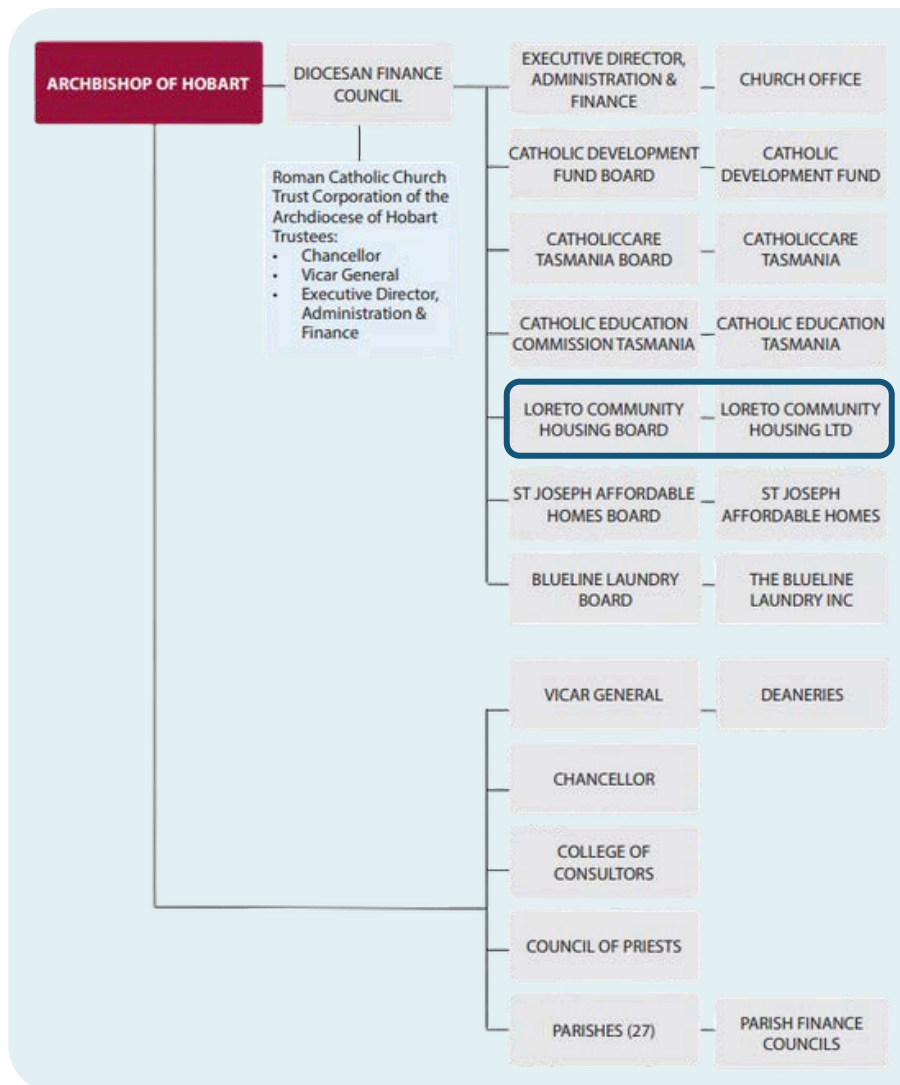
Criterion 2

Our Governance Framework

As an agency of the Roman Catholic Church Trust Corporation of the Archdiocese of Hobart (Trust), LCH is subject to the Archdiocese of Hobart Board Code of Conduct and associated Tier 1 policies.

While in most cases the Trust and respective agencies have shared members, as a statutory body corporate under the Roman Catholic Church Property Act 1932, the Trust excludes these separately incorporated bodies.

As an employer, LCH fulfils its obligations to ensure that all workers, including volunteers, adhere to external legislative requirements and internal organisational policies and procedures through the proper authority as prescribed in canon and civil law and observing the principle of subsidiarity.



Key numbers

Annual Revenue

\$44.2m

(YE 2025)

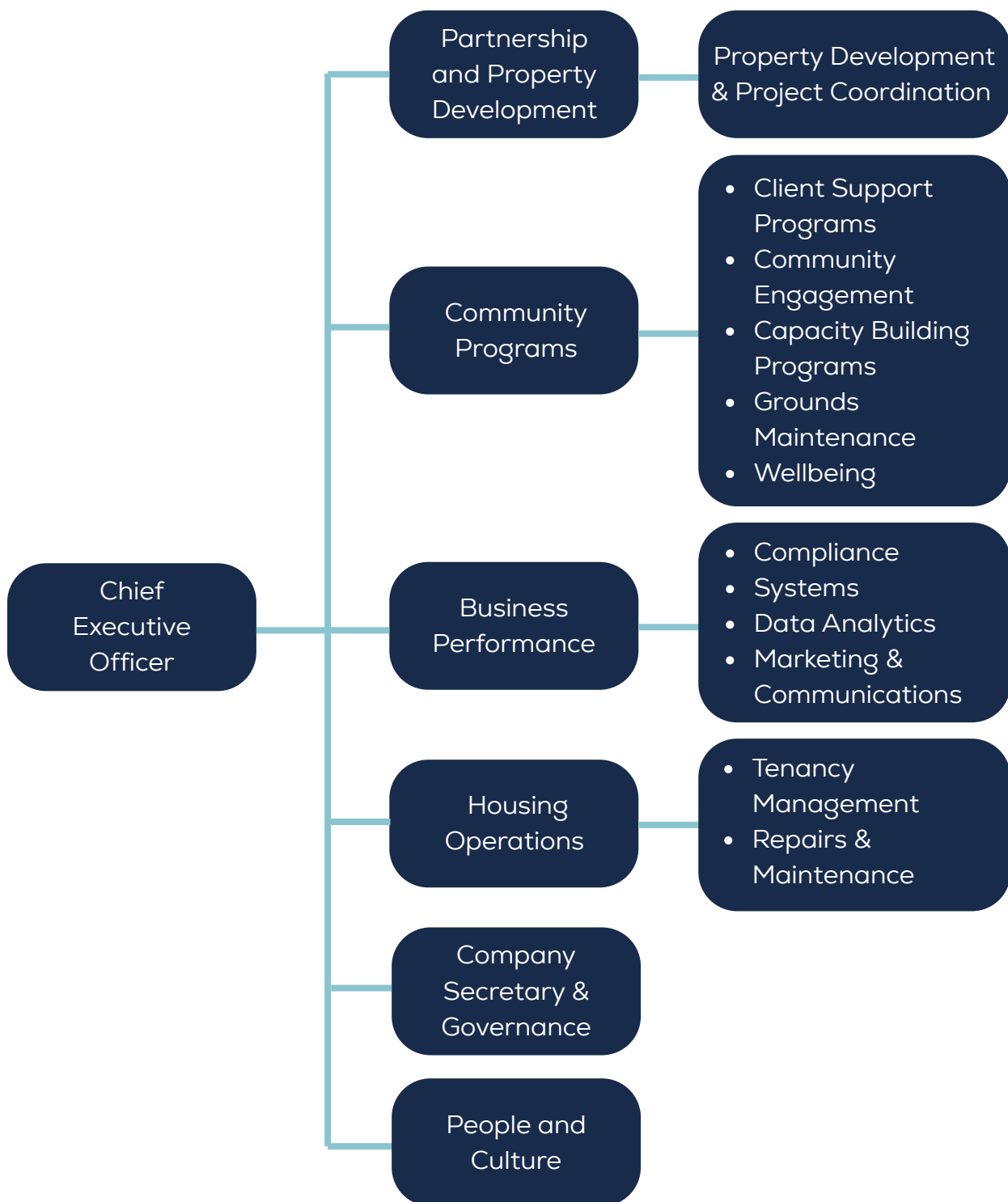
Precurement Spend

\$79m

Employees

90

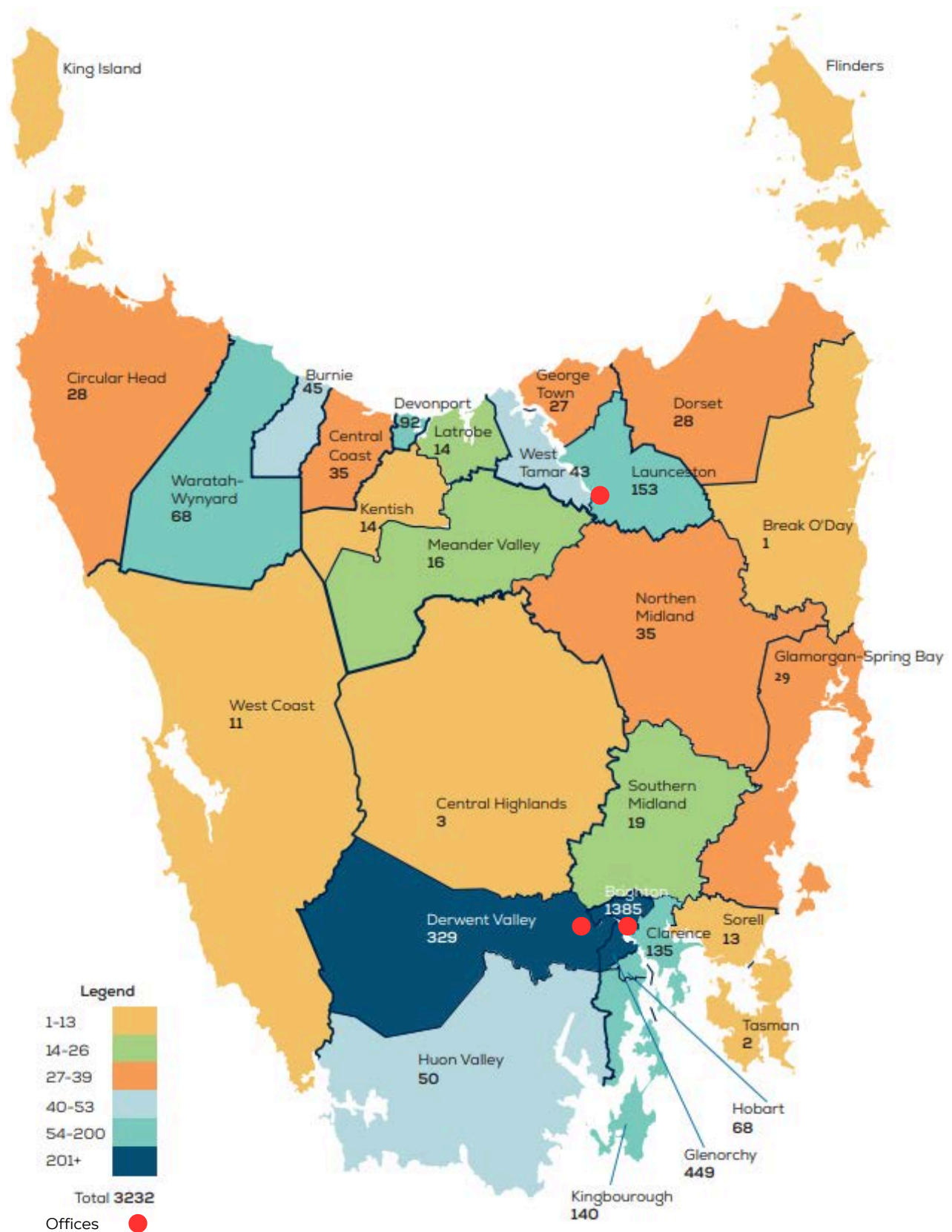
Organisational Structure



Geographic Areas of Operation

We have offices in Bridgewater, New Norfolk, and Launceston.

The below map demonstrates the number of LCH properties by Local Government Area (2024-2025 FY):



Criterion 3

Modern Slavery Risks in Operations and Supply Chains

LCH continues to develop its visibility and assessment of modern slavery risks in its supply chain and operations. The risk taxonomy across 23 categories of geographic location, industry/sector, commodity, product category and workforce profile developed by the Australian Catholic Anti-Slavery Network (ACAN) has proven a reliable tool for categorising our supply chain risk exposure in terms of high, medium and low risk. We continue to work closely with ACAN and with our contractors in the building and construction industry especially, which represent areas of greatest spend in terms of procurement.

Employment Hero

During the reporting period LCH rolled out a new Human Resources Information System called Employment Hero. This system replaced its Human Resources, Payroll and Rostering systems into one. As part of the due diligence process of onboarding a new Company, Employment Hero's Modern Slavery Statement was considered. Employment Hero have 49.6% of its supply chain in Australia, with the remaining spread across the UK, Canada, China, EU, India, Indonesia Malaysia, New Zealand, Philippines, Singapore & USA. Employment Hero maintains a zero-tolerance approach to modern slavery and continues to implement systems and processes to identify and assess the risks of modern slavery, forced labour and child labour across its operations and supply chains.

Go1

During 2025 we also changed our Mandatory Compliance Training platform and moved over to Go1. Go1 Pty Ltd is committed to the global end to modern slavery and take any breach of their Modern Slavery policy with the utmost seriousness. As we were actively implementing a number of new systems in 2025, we were unable to launch any new training units but the foundations were created and employees setup in the new systems to enable training to be rolled out in the next reporting period.

Uniform Supplier

JB's Wear, a key supplier of workwear, is an Australian owned company that sources products through overseas manufacturing partners. JB's Wear has publicly stated its commitment to ethical business conduct and requires suppliers to comply with applicable labour and employment laws. Ethical sourcing expectations are outlined in the company's published Ethical Statement, which is made available on its website.



Stationery Supplier

Winc Australia, a key supplier of stationery and workplace products, is a mandatory reporting entity under the Modern Slavery Act 2018 (Cth) and publishes an annual Modern Slavery Statement. Winc has identified offshore manufacturing as a key area of potential risk and has implemented structured due diligence measures including supplier self assessments, independent third party audits for higher risk suppliers, and ongoing monitoring supported by dedicated risk management systems. These measures support Winc's commitment to ethical sourcing and continuous improvement in addressing modern slavery risks within its supply chain.

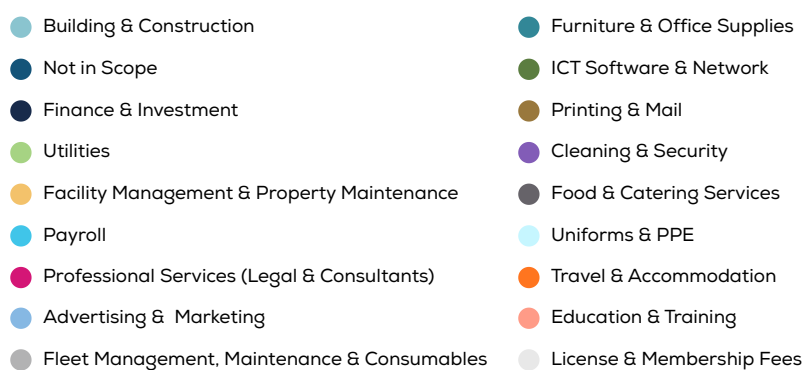
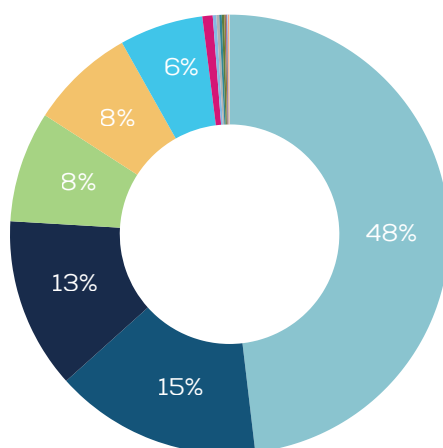
Our Supply Chains

Department	Types of Goods and Services Procured	Location of Suppliers	
		Tier 1	Tier 2
Fleet	Vehicles and vehicle servicing, tyres and cleaning	Australia	South Korea, Japan, USA
Corporate	Professional services, insurance, office supplies, ICT services and fleet management	Australia	USA
Admin	Uniform supplies, food and beverage, stationery supplies, promotional material	Australia	China
Property Development	Building & Construction materials	Australia	China, UAE, USA, New Zealand, France
Maintenance & Repairs	Heat pumps, vanities, door handles,	Australia	USA, China, Cambodia
Cleaning	Laundry chemicals and PPE	Australia	Europe, Pakistan

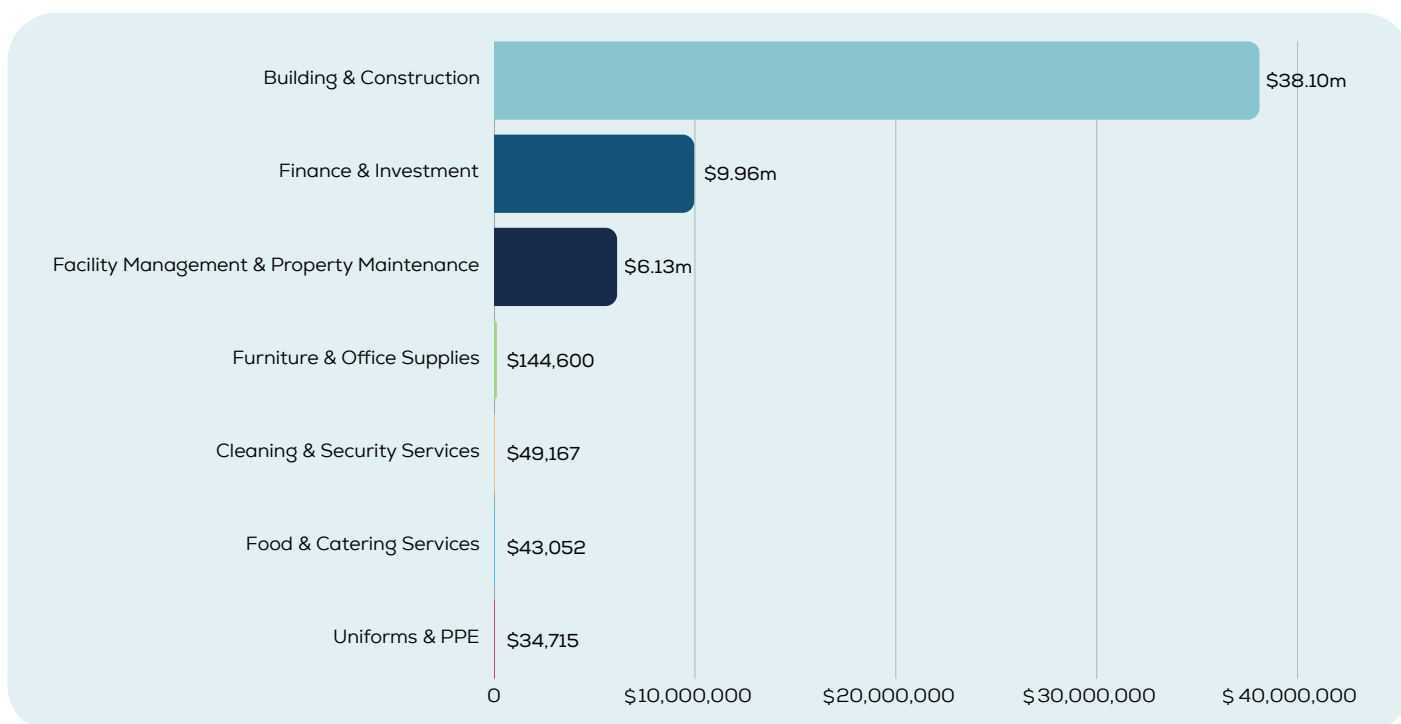
Our Supplier Categories



Procurement Spend Categories



Procurement Spend Profile in High-Risk Categories for Modern Slavery



Supply Chain Risks

Category of Modern Slavery Risks	Summary of Explanation	Summary of Explanation
Sector and Industry Risks	Certain sectors and industries are recognised as having a higher risk of modern slavery due to their characteristics, business models, products and labour practices.	LCH acknowledges that the electronics sector is globally recognised as higher risk than some other product categories. LCH also recognises: • The potential for modern slavery risks associated with conflict minerals and materials used as inputs within global supply chains; • The risk of labour exploitation in sectors that supply goods and services commonly used by organisations, including vehicle manufacturing; and • At a domestic level, that cleaning services are considered a higher-risk service industry, as they often involve low-paid and low-skilled workforces that may be vulnerable to exploitation.
Product & Service Risks	Some products and services pose a higher modern slavery risk due to the way they are produced, delivered or used, or where their production has been linked to labour exploitation by international organisations or NGOs.	LCH recognises the potential for modern slavery risks in logistics and distribution services, including within ICT and telecommunications, uniforms, cleaning, maintenance, hospitality, promotional materials and merchandise. LCH is also aware of the heightened risks associated with the production of raw materials used in supply chains for vehicles in its fleet, computer equipment, mobile phones and heat pumps.
Geographic Risks	Some countries and regions are associated with higher modern slavery risks due to factors such as weak governance, migration pressures, poverty and limited labour protections.	All LCH employees are employed within Australia, which is identified in the Global Slavery Index 2023 as having one of the lowest prevalences of modern slavery globally. All employees are directly engaged under contracts of employment and are not labour-hire workers. Notwithstanding this, LCH acknowledges the potential for geographic-based modern slavery risks within its global supply chains.
Entity Risks	Certain entities may pose higher modern slavery risks due to poor governance practices, inadequate labour standards, or a history of human rights violations.	LCH is currently assessing modern slavery risks across its operations and supply chains to develop a clearer understanding of entity-specific risks and inform appropriate mitigation strategies.

Criterion 4

Actions taken to assess and address risk



Modern Slavery Policy

In late 2025, the Tier 1 Modern Slavery Policy was reviewed, and the feedback has been consolidated into a revised policy which is due for approval in 2026. The review cemented our commitment to eliminating modern slavery within our operations and supply chains and is supported by the Archdiocese of Hobart's (AoH) Anti-Slavery Guiding Principles for Suppliers.

The policy review reaffirmed LCH's commitment to:

1. Increase awareness about modern slavery and educate and train workers and suppliers about risks of Modern Slavery including:
 - a. Geographic risk (e.g. sourcing from high-risk countries)
 - b. Sector risk (e.g. agriculture, construction, textiles)
 - c. Entity risk (e.g. suppliers with poor labour practices)
2. Require suppliers to comply with the AoH Anti-Slavery Guiding Principles for Suppliers and applicable laws;
3. Insert modern slavery prevention clauses in all tender contracts with suppliers which are identified as "high risk" via the ACAN procurement taxonomy.
4. Undertake due diligence in relation to procurement of goods and services;
5. Ensure grievance mechanisms are available to report suspected breaches of this policy; and
6. Take action to remedy any breaches of this policy and/or the Guiding Principles.

Modern Slavery Risk Controls

We are focused on embedding the following 7 modern slavery risk controls in purchasing practices as part of a comprehensive and systematic approach that integrates human rights considerations into all stages of the procurement process:

1. **Supplier Due Diligence:** Implement robust due diligence procedures to assess potential suppliers for modern slavery risks before engaging in business relationships. This may involve conducting risk assessments, background checks, and site visits to evaluate supplier practices, labour conditions, and adherence to ethical standards.
2. **Supplier Contracts and Codes of Conduct:** Include clauses in supplier contracts that explicitly prohibit modern slavery and require compliance with relevant laws and international standards. Develop and communicate clear codes of conduct outlining expectations regarding labour rights, fair wages, working conditions, and human rights throughout the supply chain.
3. **Supplier Monitoring and Auditing:** Establish mechanisms for ongoing monitoring and auditing of supplier performance to ensure compliance with contractual obligations and ethical standards. This may involve regular inspections, third-party audits, and performance evaluations to detect and address any instances of modern slavery or labour exploitation.
4. **Training and Awareness:** Provide training and awareness programs for procurement staff and relevant stakeholders to enhance understanding of modern slavery risks, signs of exploitation, and their responsibilities in mitigating these risks. Empower employees to identify and report concerns, and encourage open

communication channels for addressing issues promptly.

5. **Risk Mapping and Assessment:** Conduct thorough risk assessments to identify high-risk areas within the supply chain where modern slavery may be prevalent. This includes mapping out tiers of suppliers, geographical regions, and industries with higher likelihoods of exploitation. Use this information to prioritize risk mitigation efforts and allocate resources effectively.
6. **Supplier Engagement and Collaboration:** Foster collaborative relationships with suppliers based on transparency, dialogue, and shared commitment to ethical sourcing. Engage suppliers in discussions about modern slavery risks, provide guidance and support for improving labour practices, and incentivize responsible behaviour through recognition and rewards.
7. **Continuous Improvement and Evaluation:** Regularly review and evaluate the effectiveness of modern slavery risk controls in purchasing practices. Seek feedback from stakeholders, monitor key performance indicators, and adapt strategies as needed to address emerging risks and evolving regulatory requirements. By embedding modern slavery risk controls in purchasing practices, our organisations are demonstrating a commitment to ethical sourcing, human rights, and social responsibility.



Remediation

LCH is committed to ensuring it provides appropriate and timely remediation of people impacted by modern slavery in accordance with the Modern Slavery Act 2018. A documented remedy pathway is an important requirement of the Modern Slavery Act. Through the ACAN Program, LCH have access to the expertise and independent advice available through Domus 8.7. LCH can make referrals of people impacted by modern slavery to obtain support, advice and guidance on how to respond to concerns. The right to remedy is a basic principle in international human rights law. The provision of remedy involves a business implementing actions and processes to investigate and redress negative impacts on people involved in business operations and supply chains, and ensure future incidents are prevented.

Domus 8.7 principles:

- Independent advice and support
- Ensuring people impacted are safe and protected
- Any work undertaken is with the full knowledge and consent of people impacted
- Human rights-based approach

Domus 8.7 overview:

- A vital service and key element of the ACAN Program
- Addresses a key mandatory reporting requirement of the Modern Slavery Act.
- Provides the support needed for a rapid, coordinated response when victims are identified.
- Develops the internal capability to manage risk and engage staff
- Establishes a documented process to manage complex humanitarian issues
- Upholds Catholic Social Teaching
- Ensures ongoing commitment to protecting the human rights of people in operations and supply chains.

Domus 8.7 service profile:

- Guidance and advice for entities who identify slavery
- Coordination with government agencies, victim support organisations and others
- Develop internal capabilities to manage modern slavery risk
- Confidential independent grievance mechanism to report suspected incidents of modern slavery
- Practical and timely support for people impacted by modern slavery

Additional information about Domus 8.7 and the process applied can be found on acan.org.au/domus87

Office Cleaning

Cleaning/labour hire companies can be considered high risk for modern slavery for several reasons including high turnover rates, fragmented workforce and hidden nature of the work given it is often done often out of hours.

During 2025, Loreto supported another AoH agency, Blueline Laundry, to strengthen a new arm of its business being cleaning services. Having commenced operations in Hobart in 1893, Blueline Laundry is the longest serving commercial laundry in Tasmania, with an established reputation for outstanding service and benefits to the community. Blueline Laundry's point of difference is its non-discriminatory employment choices, actively employing people with a disability or experiencing disadvantage.

We are proud to be able to engage Blueline to undertake the cleaning services for our office in Bridgewater.

Our Plans for 2026

In 2026, LCH will be focused on strengthening governance, improving visibility of higher risk suppliers, and embedding modern slavery considerations into procurement and policy frameworks. Actions will be intentionally risk based and proportionate to LCH's operations, with a focus on continuous improvement.

1. Finalise review of and approve Tier 1 Modern Slavery Policy.
2. Rollout Modern Slavery Training to all current and onboarded employees in 2026 calendar year.
3. Executive Team to undertake Modern Slavery Awareness Training with industry expert.
4. Formally assign executive ownership of modern slavery risk to drive awareness and activities.
5. Engage with a number of higher risk suppliers to improve understanding of supplier practices and risk awareness and ensure grievance mechanisms are accessible and known to contractors.

Criterion 5

Effectiveness

LCH is committed to ensuring that our actions taken to identify, assess and address risks of modern slavery are effective.

During the reporting period, LCH's capacity to assess the effectiveness of its modern slavery actions was limited due to an organisational focus on establishing key foundational systems, including the implementation of a new Human Resources Information System (HRIS) and a new compliance training platform. These systems are intended to strengthen workforce governance, data integrity and training oversight and are expected to support more effective identification, management and monitoring of modern slavery risks over time. As these systems were in the early stages of implementation during the reporting period, LCH did not undertake formal effectiveness assessments. LCH intends to use these strengthened systems to support improved evaluation of modern slavery controls and actions in future reporting periods.

LCH recognises that assessing effectiveness is an evolving process and is committed to continuous improvement in line with the intent of the Modern Slavery Act 2018 (Cth). Our activities this year, whilst not on the scale of previous years, have created the foundations for future years.



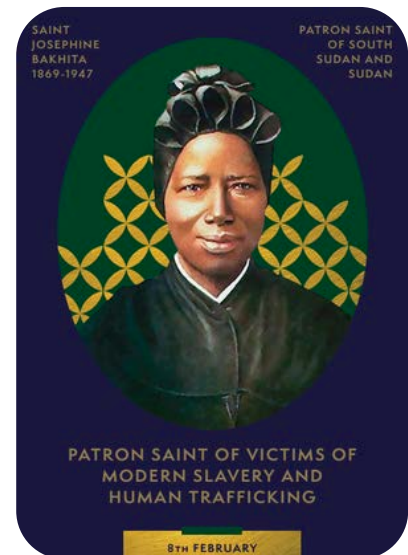
Criterion 6

Consultation and Awareness Activities

International Day of Prayer and Awareness Against Human Trafficking

On 8 February, Loreto observed the Feast Day for St Josephine Bakhita, patron saint of victims of human trafficking and modern slavery in the Chapel. This day invited us to pause, reflect, and renew our commitment to justice and dignity for all. Across Australia, Catholic organisations unite in prayer and action and provides an opportunity to consider how each of us can contribute to ending modern slavery and raising awareness of its impact.

Modern slavery, including human trafficking, forced labour, and forced marriage, remains a grave injustice. It exploits some of the most at-risk people in our communities, stripping women, men, and children of their freedom and fundamental human rights. Through education, awareness, and advocacy, we seek to shine a light on these hidden realities and give voice to those who have felt powerless or unseen.



Criterion 7

No Other Information







Southern Cross Care
(Tasmania) Inc.

Modern Slavery Statement 2025

SOUTHERN CROSS CARE (TASMANIA) INC
1 JANUARY 2025 TO 31 DECEMBER 2025



Feel right at home.

Southern Cross Care (Tasmania) Inc
ABN 18 773 507 851
85 Creek Road, New Town TAS 7008
scctas.org.au | enquiries@scctas.org.au

Southern Cross Care (Tasmania) Inc (“Southern Cross Care Tasmania”) has been caring for our community and supporting their quality of life for over 50 years.

Wholly Tasmanian, our focus is to provide the highest standards of nursing, health and aged care, hospitality and wellbeing initiatives. Our mission is to demonstrate the love of Christ by providing a range of aged care services which meet the needs of people in our Tasmanian community.

Southern Cross Care Tasmania operates in Tasmania and has services such as Residential Aged Care, Home and Community Services and Lifestyle Villages.

This is Southern Cross Care Tasmania’s modern slavery statement for the reporting period of 1 January 2025 to 1 December 2025

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Criteria 6: Consultation with Owned or Controlled Entities

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Introduction, Approval and Signature

3 This is the first Modern Slavery Statement ("Statement") submitted by Southern Cross Care (Tasmania) Inc ("SCCT") pursuant to the Commonwealth Modern Slavery Act 2018 (the "Act").

4

7 At SCCT, our work is grounded in a deep commitment to uphold the dignity, wellbeing and inherent worth of every person. We strive to create environments where individuals feel safe, respected and valued. This is particularly important for the vulnerable groups we serve, who may face heightened risks of exploitation, disadvantage or marginalisation.

8

10 Guided by our values of compassion, integrity and respect, this commitment extends beyond the care we provide to the way we operate, the partnerships we form, and the impact we have across our communities and supply chains. We remain vigilant to modern slavery risks and continuously strengthen how we identify, assess and respond through responsible procurement, workforce awareness, and collaboration with ethical partners.

12

15 This is a joint Statement made with a range of Australian Catholic organisations that are participating in the Australian Catholic Anti-Slavery Network ("ACAN"). It forms part of ACAN's 2025 Compendium of Modern Slavery Statements.

15 This Statement relates to the period 1 January 2025 to 31 December 2025 ("Reporting Period").

This Statement was approved by the principal governing body of SCCT on 25 June 2026 and is signed by a responsible member of SCCT as defined by the Act.



Sonya Beyers
Chair of the Board
Southern Cross Care
(Tasmania) Inc

Criteria 1: About Southern Cross Care Tasmania

Southern Cross Care (Tasmania) Inc ("SCCT") is a wholly Tasmanian, not-for-profit aged care provider with more than 50 years of experience supporting older people in the community. As the largest not-for-profit aged care provider in the state, the organisation is dedicated to delivering high-quality nursing, health and aged care services, along with hospitality and wellbeing initiatives.

The organisation offers a comprehensive range of services designed to support individuals at every stage of ageing. These include Home and Community Services, Lifestyle Villages, Residential Care and Respite Care, all tailored to meet the unique needs of each person.

With a strong focus on compassion, quality of life and belonging, SCCT strives to create environments where residents and clients feel at home, supported and valued.

Our History

SCCT was established in 1972 by the Knights of the Southern Cross, who recognised the need to support older people to remain active and self-sufficient within their communities. The organisation's first development was a cluster of independent living units in Launceston, reflecting a commitment to dignity, independence and community connection.

Over the decades, the organisation expanded significantly, developing and acquiring a wide range of residential aged care facilities, retirement living villages and home care services across Tasmania. Key milestones include the opening of Guilford Young Grove in 1976, the commencement of home care services in 1994 and the continued growth of facilities across the state into the 2000s and beyond.

This steady growth has enabled SCCT to become one of the state's leading aged care providers and a major employer, while continuing to honour its founding purpose of caring for the community with compassion and respect.

Our Mission



SCCT's mission is to demonstrate the love of Christ by providing a range of aged care services which meet the needs of people in our Tasmanian community. This mission underpins all aspects of the organisation's work, guiding the delivery of person-centred care that supports wellbeing, dignity and quality of life.

Our Values

In the spirit of Christ and within the tradition of the Catholic faith, SCCT is guided by three core values:



Compassion

The organisation responds willingly to meet the needs of others, promoting a strong sense of belonging and community. It fosters empathy and sensitivity towards residents, clients, families, colleagues and the wider community.



Integrity

SCCT seeks the good in all people and values each individual's contribution. It acts with honesty and trustworthiness, ensuring ethical decision-making and accountability in all actions.



Respect

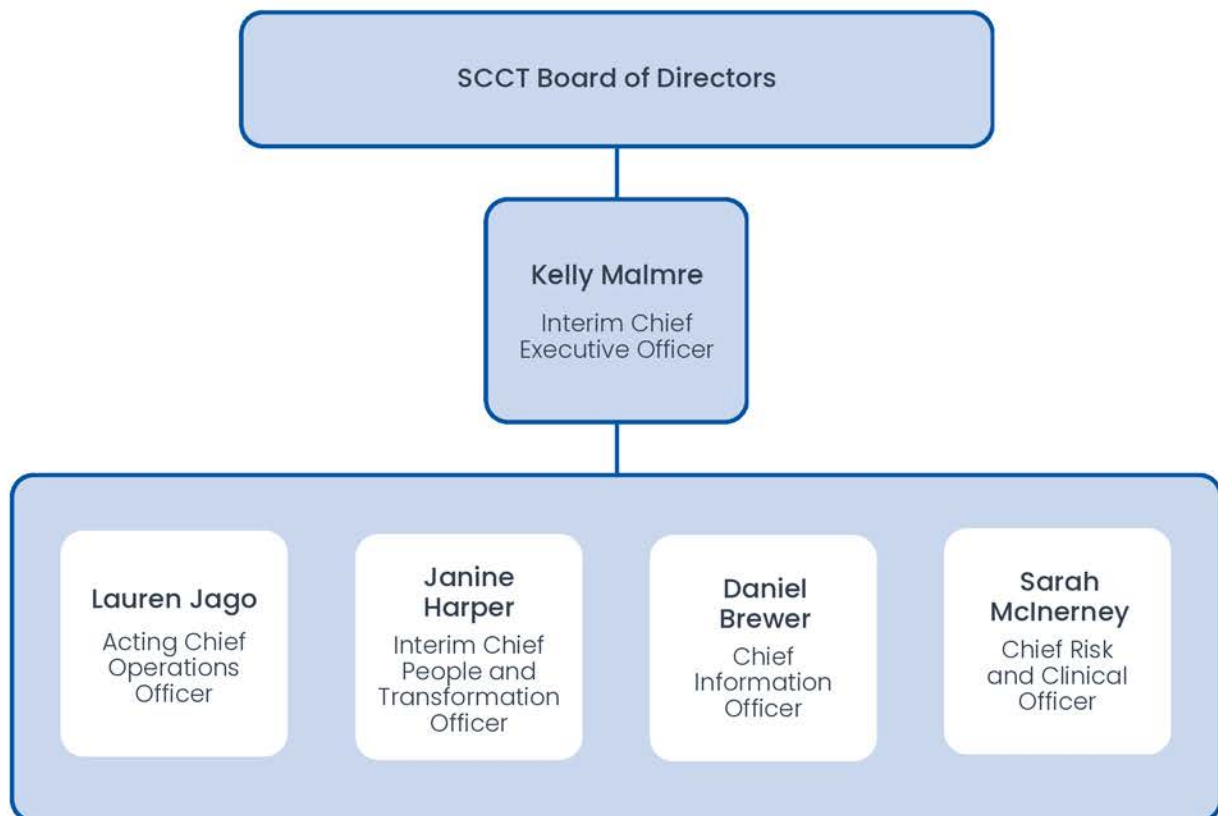
The organisation recognises the inherent dignity and uniqueness of every individual. It values diversity, treats all people with courtesy and fairness, and seeks to manage resources responsibly, including minimising environmental impact.

Our Governance

SCCT's operational delivery is led by a skilled executive team working alongside and in support of the Chief Executive who draw on their extensive experience across complex, regulated environments.

Strategic leadership and governance sit with the Board, which guides the organisation's long-term direction and ensures robust oversight frameworks are in place to meet all legal and regulatory obligations, including those outlined in the Modern Slavery Act 2018 (Cth).

Our current organisation structure as at June 2026



Our Services

SCCT provides a range of services designed to support independence, wellbeing and quality of life at every stage of ageing.

Home & Community Services



Goal: Keep individuals happy, healthy and living independently in their own home for as long as possible.

Our Home & Community Services help individuals stay independent, safe and connected while living at home. We offer individually planned and coordinated support, and work with individuals, their families and supports to ensure the right help is supplied when it is needed.

Our services are delivered by trained, qualified staff who understand Tasmanian communities.

The service types we offer include:

- Personal care
- Wellbeing and community support
- Daily living and household support
- Health and clinical support
- Specialised care

The funding options and programs we offer include:

- Support at Home (SAH)
- Commonwealth Home Support Program (CHSP)
- Department of Veterans' Affairs (DVA)
- Private services

Residential Care



Goal: To provide holistic, high-quality residential aged care that enabling individuals to live happy, fulfilling and rewarding lives tailored to their individual needs and preferences.

Our Residential Aged Care solutions include permanent, respite and dedicated dementia care. Our large and professional care team includes 24/7 on-site nurses, professional chefs and allied health staff such as physiotherapists.

Our qualified and passionate Clinical and Lifestyle services staff value each individual and respect their needs and preferences.

We're passionate about supporting physical, emotional, spiritual and social health, and the wellbeing of residents is central to daily life at each of our eight facilities across Tasmania.

All facilities provide compassionate palliative support and gentle, Montessori-principled dementia care where required.

Lifestyle Villages



Goal: To provide independent, low-maintenance retirement living in supportive community environments that enable residents to maximise their enjoyment of life.

Our Lifestyle Villages are for individuals of retirement age who want to maintain their independence and get the maximum out of life and live freely with fewer day-to-day worries.

The Lifestyle Villages have been designed with possible future care needs in mind with residents able to access additional support through our Home & Community Services.

We offer a wide range of village options among our 13 Lifestyle Villages in locations across Tasmania.

Criteria 2: Our Structure, Operations and Supply Chains

Structure of SCCT

SCCT is a not-for-profit incorporated association, registered in Australia and recognised as a charity by the Australian Charities and Not-for-profits Commission. It does not own or control any other operating entities.

The organisation operates across 21 service locations throughout Tasmania, in addition to providing in-home care and support services. Its head office is located at 85 Creek Road, New Town, Tasmania.

SCCT is supported by approximately 1,216 employees, consisting of full-time, part-time (predominantly), and casual staff. It is also supported by around 106 volunteers who contribute to its operations.

Operations

SCCT provides a range of accommodation and care services throughout Tasmania. These services include:

1. **Residential aged care** for more than 560 residents across 8 aged care facilities.
2. **Retirement living** for approximately 814 residents, offering independent living in homes, villas, apartments, and units across 13 communities.
3. **Home care services** for around 1,122 clients, including home cleaning, personal care, nursing support, as well as gardening and general maintenance.

In addition, SCCT maintains a portfolio of self-managed financial investments.

Supplier relationships

To deliver accommodation and care services, SCCT relies on a wide range of suppliers across different industries. The organisation currently works with approximately 822 suppliers located throughout Australia.

SCCT has a procurement policy in place to ensure consistent engagement with suppliers and to guide tendering processes when required. A centralised procurement team manages the selection, onboarding, and

performance monitoring of all suppliers.

Before providing goods or services, suppliers must meet the following requirements:

- Be approved by the Central Office and have their account set up in the financial and procurement system.
- Register in the Zipline system before entering any SCCT site. Supplier representatives must also complete this registration. A QR code check-in system is currently being trialled to ensure compliance with mandatory requirements.

Depending on the nature of the goods or services, SCCT enters into either short-term or long-term contractual arrangements. All significant contracts are subject to regular competitive tendering and must comply with strict probity standards.

Supply chains

Most of SCCT's suppliers are based in Australia.

The organisation procures a wide range of goods and services to support its operations, including food, medical supplies, cleaning products and services, furniture and equipment, office and ICT supplies, vehicles, and temporary staff from labour-hire agencies. It also engages contractors for repairs, maintenance, and capital works, working with construction companies and builders to deliver these projects.

A central office supports overall operations, and external service providers and consultants – such as auditors, lawyers, and IT professionals – are engaged as needed.

Criteria 3: Modern Slavery Risks

Risk Assessment

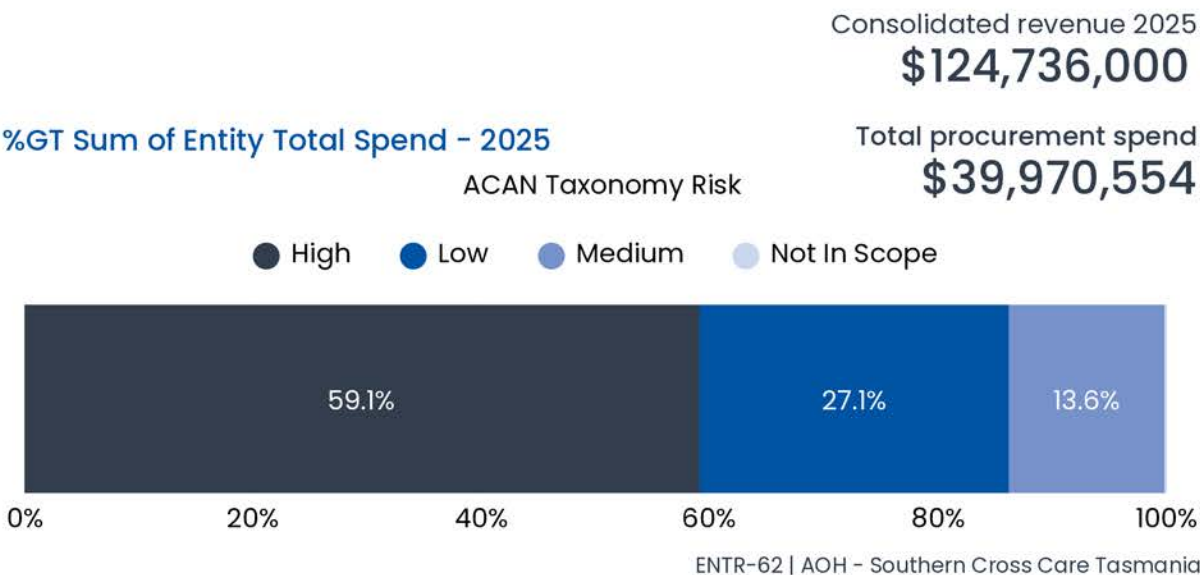
For Catholic entities, modern slavery risks are defined by the ACAN Category Risk Taxonomy, a classification standard that identifies severity of actual or potential harm to people (saliency) in spend categories.

The ACAN Category Risk Taxonomy is based on sources such as:

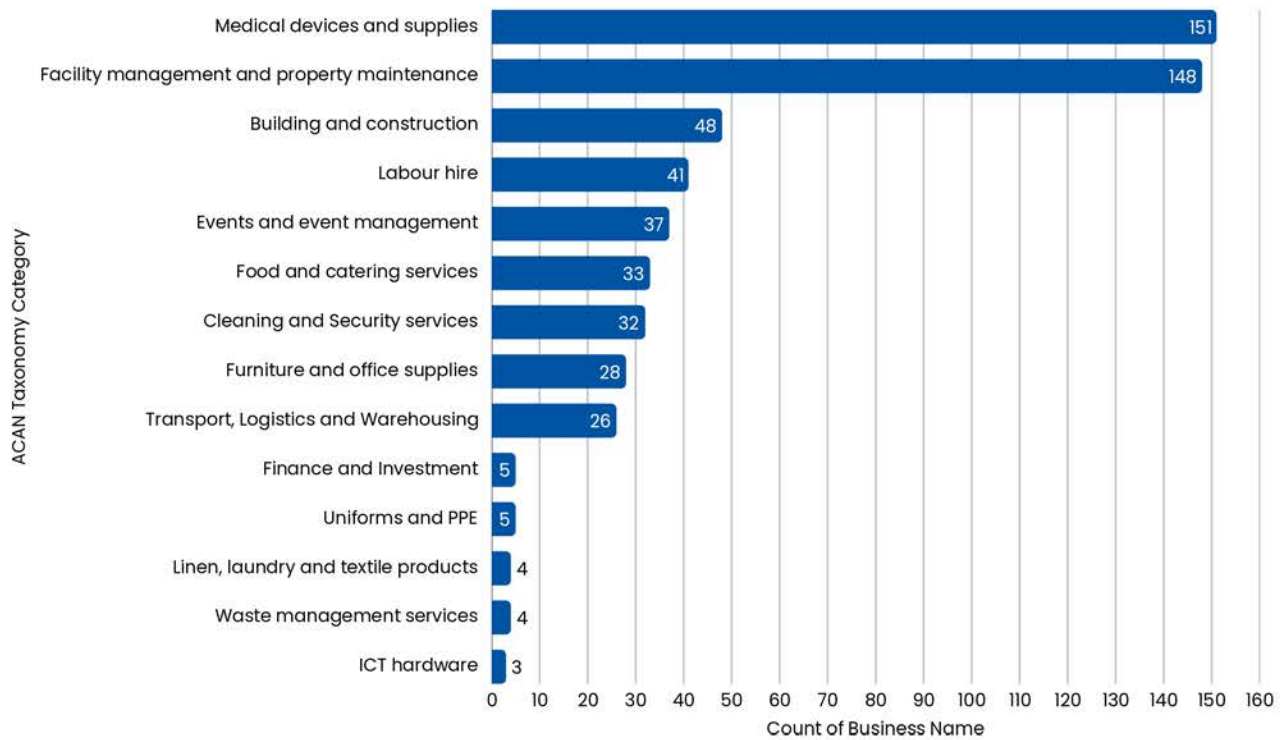
- the Global Slavery Index
- the International Labor Organisation (ILO), including definitions of modern slavery
- the Bureau of International Labor Affairs (ILAB), US Department of Labor
- the Global Child Forum and UNICEF

Four key factors are also used to determine the level of risk:

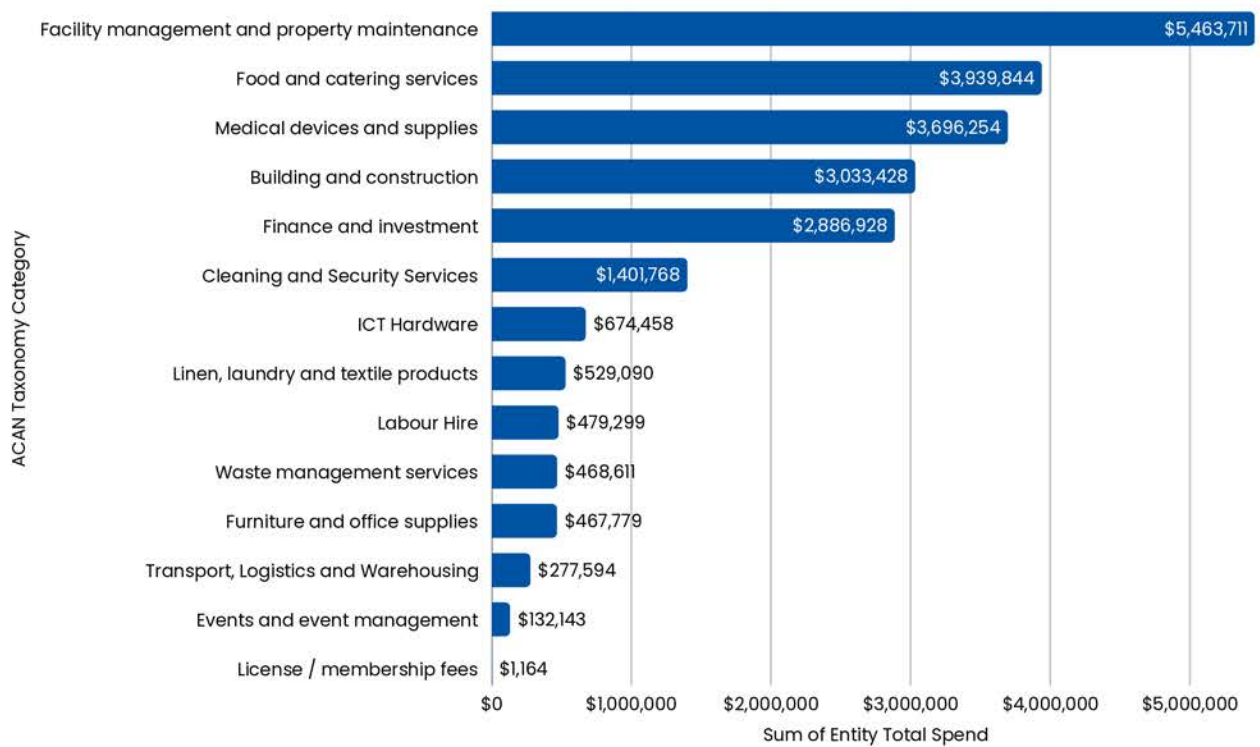
- **Geography:** the country or location where a good is made or service is delivered
- **Industry:** the sector in which the making of goods or delivery of service occurred
- **Commodity:** the raw materials or components that comprise the goods or products
- **Workforce vulnerability:** such as bonded visas, temporary migrants, women or children known to be employed in specific industry sectors
- **Domus 8.7 remediation service:** trends, cases, and risk intelligence identified through the Domus 8.7 remediation service, including grievances and remediation insights relevant to category and risk to workers.



Count of Business Name by ACAN Taxonomy Category



Sum of Entity Total Spend - 2025



Criteria 4: Actions Taken to Assess and Address Modern Slavery Risks

ACAN supplier engagement

The ACAN Program provides supplier engagement support and data, enabling a systematic and comprehensive supply chain risk assessment. In 2025 the ACAN Modern Slavery Risk Management Program launched a new purpose-built data management platform – ROTA. ROTA centralises the ACAN Risk Management Program framework and facilitates supplier performance evaluation and engagement.

1. Evaluation of the modern slavery risk within operations and supply chains, using the ACAN Risk Taxonomy.
2. ACAN Supplier Survey to identify supplier revenue, number of employees, countries of origin for goods sourced overseas, workforce contractual arrangements and SEDEX membership status.
3. Supplier education on modern slavery and risk management in key areas: cleaning, building and construction, procurement of labour, labour hire and services, sourcing goods from overseas, grievance mechanisms and remediation.
4. Onboarding suppliers to SEDEX requires a business address, contact details and goods or services provided.
5. SEDEX Self-Assessment Questionnaire (SAQ) helps suppliers to evaluate their practices against established standards and identify areas for improvement.
6. Desktop review to identify key actions required from suppliers.
7. Enhance supplier screening using Know Your Client (KYC) intelligence software.
8. Corporate Social Compliance Audits provide a point in time, objective and independent verification process of supplier alignment with local laws and worker wellbeing standards.
9. Domus 8.7 Index modern slavery statement assessment on selected suppliers in high-risk categories.
10. ACAN Prequalified Supplier Directory – a list of preferred suppliers accessible to Catholic organisations.

Grievance and Remediation

SCCT is committed to ensuring appropriate and timely remedy to people impacted by modern slavery, in accordance with the United

Nations Guiding Principles on Business and Human Rights, Commonwealth Modern Slavery Act 2018 – Guidance for Reporting Entities and relevant Australian laws.

This includes providing for, or cooperating in, actions to address harms to people and root causes to mitigate future risks if SCCT is found to have caused or contributed to modern slavery. An external, confidential whistleblower hotline run by Stopline is accessible to staff, service providers and contractors, and SCCT's Whistleblower Policy is publicly available.

Domus 8.7

SCCT has access to Domus 8.7 Modern Slavery Remediation Service. Domus 8.7 provides SCCT:

- resources that enable us to listen to workers (grievance channel)
- a 24/7 careline for workers on our sites, staffed by professional counselors
- direct support to people impacted by modern slavery
- guidance and technical assistance to prevent, identify and remediate modern slavery
- a documented process to assess if an organisation has caused, contributed or is directly linked to modern slavery and modern slavery indicators

Domus 8.7 empowers people impacted by modern slavery to have choice and control over what forms of remediation are meaningful to them and to engage safely with business/supply chain actors. Supports may include:

- modern slavery indicator assessment
- needs assessment, case coordination, response and remediation planning
- referrals to community, social services, unions
- transport, accommodation, financial and food support
- legal support, referrals, accompaniment and advocacy
- job training, retraining and redeployment
- accompaniment and advocacy to engage with government and law enforcement agencies
- opportunities to contribute lived expertise to improve modern slavery responses

The Domus 8.7 Advisory Committee Members also include a person with lived expertise, Mr Moe Turaga. Domus 8.7 is a registered charity with the Australian Charities and Not-for profits Commission (ACNC) and is an endorsed Public Benevolent Institution with Deductible Gift Recipient (DGR) status. ABN 244 72497189.



Criteria 5: Assessing Effectiveness

Continuous improvement

Collaboration is at the heart of accelerating progress. This also includes opportunities to comparatively measure social, environmental and governance (business ethics) risks and actions with peers in our network.

In 2025, the ACAN Program adopted a globally recognised risk measurement system through SEDEX. This aligns reporting entities with a methodology that combines global data about risks in different countries and industries with site-specific information from the SEDEX platform. SEDEX regularly updates the methodology to ensure it is aligned with new and emerging risks.

Therefore, completion of the SEDEX SAQ completed by SCCT is a substantial measure of continuous improvement year on year. Scoring is calculated using the SEDEX SAQ and SCCT 2025 risk scores and management controls that will serve as our benchmark for continuous improvement. The scoring is calculated from inherent risk and site characteristics, adjusted for management controls and audit results.

The score is broken down by pillars, including Labour Standards, Health and Safety, Business Ethics and Environment, and highlights strengths and opportunities to focus our efforts on key areas that drive ethical and sustainable practices.



Baseline data

The ACAN baseline data table provides a comparative measure of supplier engagement and program activities to measure progress and inform future action planning.

	Activity	2025
Internal / Staff	Hours spent on modern slavery activities	0
	Individual staff completed e-learning	0
	E-learning modules completed	0
External / Supplier Engagement	Total number of suppliers	822
	Number of suppliers across high-risk categories	565
	Number of ACAN Supplier Surveys completed	205
	Supplier staff attending capacity building webinars	17
	Invited to join Sedex	39
	Joined Sedex	6
	Sedex SAW completed	2
	Social audits	0
	Corrective actions	0
Domus 8.7 External Referrals	Contacts made via worker voice / grievance mechanism	0
	Referrals for advice and assistance	0
	Individuals identified or referred for modern slavery assessment	0
	Individuals with modern slavery cases remediated	0

Table One: SCCT's baseline data for 2025

SCCT has completed the actions planned for the previous reporting period, and these efforts will serve as a foundation for the next reporting period.

During 2026, SCCT will:

- continue due diligence on Tier 1 (high-risk) suppliers, including reissuing questionnaires;
- ensure all relevant purchasing staff maintain up-to-date training through online modules and in-person sessions;
- use existing modern slavery screening data and insights to conduct further due diligence on high-risk supply categories;
- incorporate any legislative changes into processes, documents, and training materials;
- review and update the modern slavery screening questionnaire to capture any changes in suppliers' practices or sourcing within the supply chain;
- review the remediation plan to streamline processes and improve efficiency; and
- update the Modern Slavery information available on the SCCT intranet.



Criteria 6: Consultation with Owned or Controlled Entities

As SCCT does not own or control any other operational entities, this criterion is not applicable to SCCT.

Criteria 7: Any Other Relevant Information

No other relevant information.





Southern Cross Care
(Tasmania) Inc.

Southern Cross Care (Tasmania) Inc

ABN 18 773 507 851

Registered Office

85 Creek Road
New Town TAS 7008

(03) 6240 8800

enquiries@scctas.org.au

scctas.org.au



St Joseph
Affordable
Homes

2025 MODERN SLAVERY STATEMENT

1 January - 31 December 2025

St Joseph Affordable Homes
ABN: 96 397 668 255
2-4 Paice Street, Bridgewater, TAS, 7030
SJAH.org.au

Leadership Statement on Modern Slavery

We recognise that modern slavery remains a real and significant risk within global supply chains. As an organisation, we are committed to conducting our operations responsibly and taking reasonable, proportionate steps to identify and address modern slavery risks where they may arise.

This commitment is reflected through everyday actions including how we engage suppliers, make procurement decisions, and raise awareness across our workforce. These activities support transparency, informed decision-making, and continuous improvement. Leadership expects all our employees and partners to act ethically, speak up about concerns, and contribute to a culture where respect for human rights is part of how we do business. By embedding these principles into our regular activities, we strengthen our collective ability to reduce risk and meet our obligations under the Modern Slavery Act 2018.

Disclosure

This statement has been produced on behalf of St Joseph Affordable Homes (SJAH). This statement covers SJAH as an entity owned or controlled by the Roman Catholic Church Trust Corporation of the Archdiocese of Hobart. This Modern Slavery Statement was approved on 24 June 2026 and is signed by a responsible member of SJAH as defined by the Act.



A handwritten signature in white ink, appearing to be "Cody Burdon".

Cody Burdon
Chief Executive Officer
St Joseph Affordable Homes

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Criterion 1

St Joseph Affordable Homes (SJAH) is committed to maintaining and continuously improving its systems and processes to prevent, identify and address the risk of modern slavery and human rights violations within its operations, supply chains, services and programs.

SJAH recognises that modern slavery can take many forms, including forced labour or services, domestic and sexual servitude, child labour, bonded labour, debt bondage, deceptive recruitment practices, forced or servile marriage, human trafficking, workplace abuse and other slave-like practices. In this statement, the terms modern slavery and human trafficking refer collectively to these forms of exploitation.

SJAH is committed to delivering affordable and sustainable housing products and meaningful employment opportunities in a responsible and ethical manner and does not tolerate any form of modern slavery within its operations or supply chains.

About Us

SJAH is a Catholic building and construction social enterprise, established in 2020 by the Archdiocese of Hobart.

Our vision to alleviate housing stress and homelessness is coupled with our purpose of providing substantial and sustainable employment opportunities to young Tasmanians with barriers to employment.

We leverage the extensive social and affordable housing construction programs of Loreto Community Housing, CatholicCare Tasmania and other mission aligned organisations to provide employment, in particular trade apprenticeships, for young Tasmanians.

In addition to employment, we offer a range of coaching, mentoring and wellbeing supports to our apprentices and qualified trades, delivered through a highly successful partnership with Loreto Community Housing's Build Up Tassie program, to aid in meaningful employment, training, and life outcomes.

2024/25 Financial Year


130
Homes
Completed in
2024/25
financial year

90
Homes
commenced
construction



40
Total number of
Apprentices/
Trainees supported

36
Total number of
employees

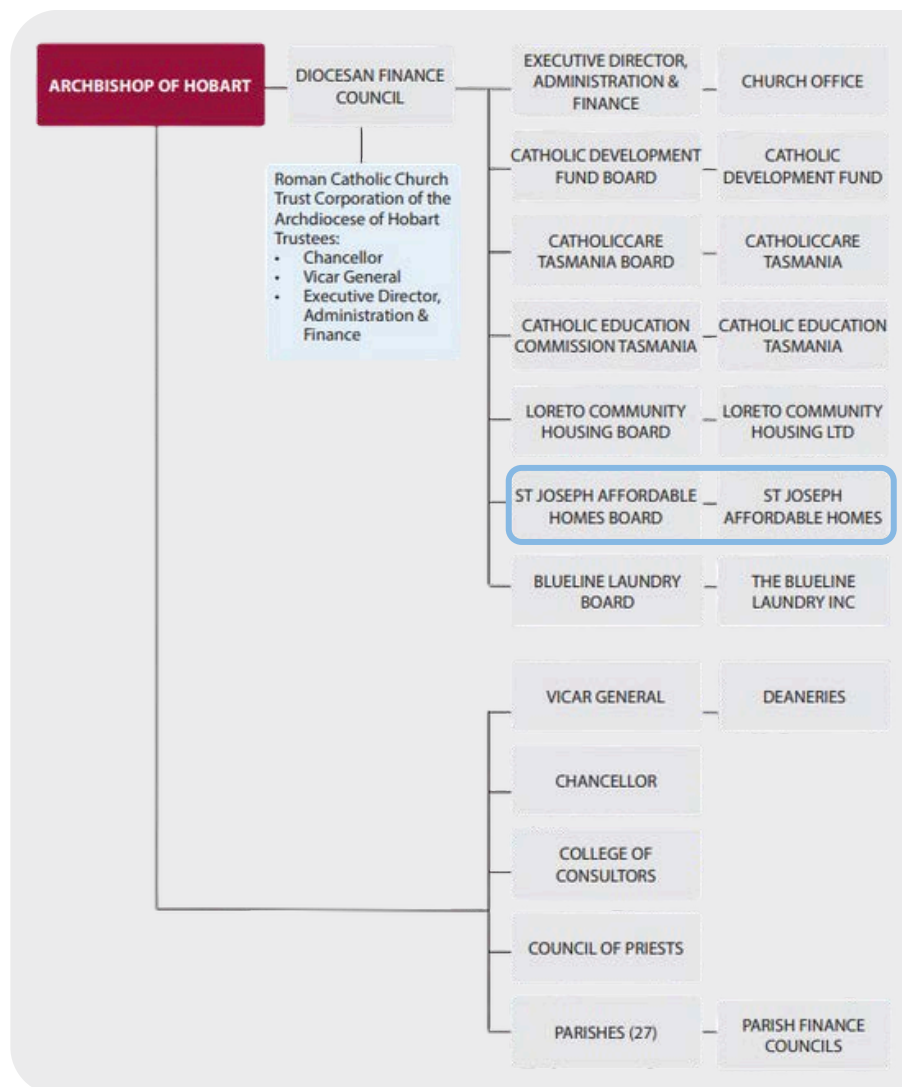

Criterion 2

Our Governance Framework

As an enterprise of the Archdiocese of Hobart, SJAH is subject to the Archdiocese of Hobart Board Code of Conduct and associated Tier 1 policies.

While in most cases the Trust and respective associations have shared members, as a statutory body corporate under the Roman Catholic Church Property Act 1932, the Trust excludes these separately incorporated bodies.

As an employer the Trust fulfils its obligations to ensure that all workers, including volunteers, adhere to external legislative requirements and internal organisational policies and procedures through the proper authority as prescribed in canon and civil law and observing the principle of subsidiarity.



Key numbers

Annual Revenue

\$23.3m

(YE 2025)

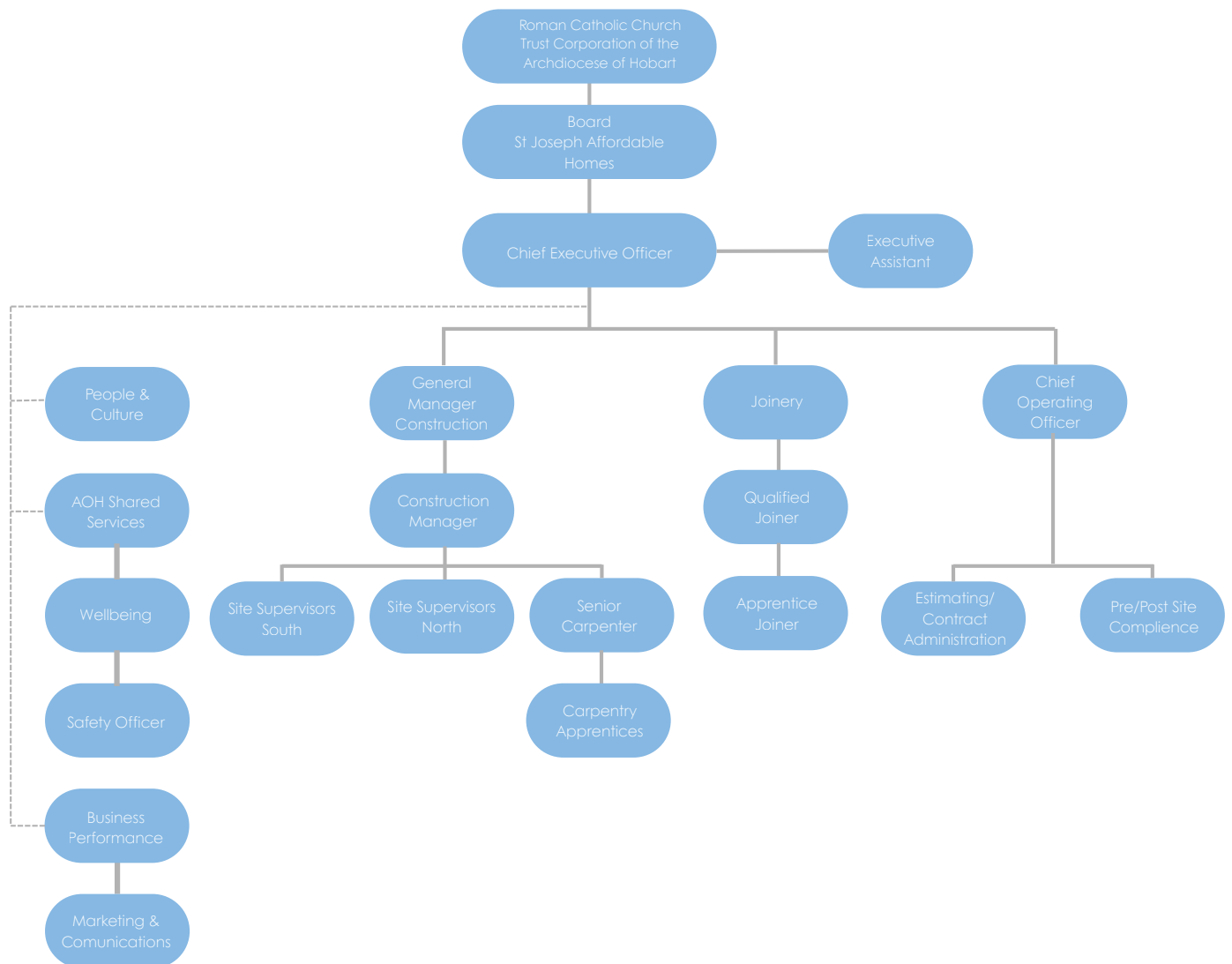
Precurement Spend

\$22.7M

Employees

36

Organisational Structure



Criterion 3

Modern Slavery Risks in Operations and Supply Chains

SJAH continues to develop its visibility and assessment of modern slavery risks in its supply chain and operations. The risk taxonomy across 23 categories of geographic location, industry/sector, commodity, product category and workforce profile developed by the Australian Catholic Anti-Slavery Network has proven a reliable tool for categorising our supply chain risk exposure in terms of high, medium and low risk. We continue to work closely with ACAN and with our contractors in the building and construction industry especially, which represent areas of greatest spend in terms of procurement.

Employment Hero

During the reporting period SJAH rolled out a new Human Resources Information System called Employment Hero. This system replaced its Human Resources, Payroll and Rostering systems into one. As part of the due diligence process of onboarding a new Company, Employment Hero's Modern Slavery Statement was considered. Employment Hero have 49.6% of its supply chain in Australia, with the remaining spread across the UK, Canada, China, EU, India, Indonesia Malaysia, New Zealand, Philippines, Singapore & USA. Employment Hero maintains a zero-tolerance approach to modern slavery and continues to implement systems and processes to identify and assess the risks of modern slavery, forced labour and child labour across its operations and supply chains.

Go1

During 2025 we also changed our Mandatory Compliance Training platform and moved over to Go1. Go1 Pty Ltd is committed to the global end to modern slavery and take any breach of their Modern Slavery policy with the utmost seriousness. As we were actively implementing a number of new systems in 2025, we were unable to launch any new training units but the foundations were created and employees setup in the new systems to enable training to be rolled out in the next reporting period.

Uniform Supplier

JB's Wear, a key supplier of workwear, is an Australian owned company that sources products through overseas manufacturing partners. JB's Wear has publicly stated its commitment to ethical business conduct and requires suppliers to comply with applicable labour and employment laws. Ethical sourcing expectations are outlined in the company's published Ethical Statement, which is made available on its website.



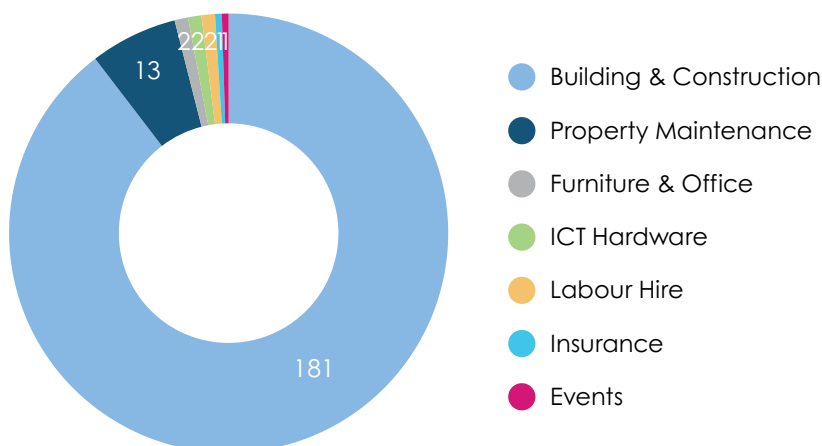
Stationery Supplier

Winc Australia, a key supplier of stationery and workplace products, is a mandatory reporting entity under the Modern Slavery Act 2018 (Cth) and publishes an annual Modern Slavery Statement. Winc has identified offshore manufacturing as a key area of potential risk and has implemented structured due diligence measures including supplier self assessments, independent third party audits for higher risk suppliers, and ongoing monitoring supported by dedicated risk management systems. These measures support Winc's commitment to ethical sourcing and continuous improvement in addressing modern slavery risks within its supply chain.

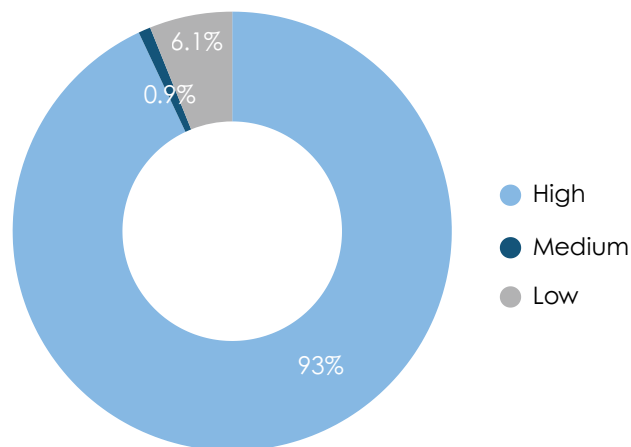
Our Supply Chains

Department	Types of Goods and Services Procured	Location of Suppliers	
		Tier 1	Tier 2
Fleet	Vehicles and vehicle servicing, tyres and cleaning	Australia	South Korea, Japan, USA
Corporate	Professional services, insurance, office supplies, ICT services and fleet management	Australia	USA, unknown
Admin	Uniform supplies, food and beverage, stationery supplies, promotional material	Australia	China, unknown
Property Development	Building & Construction materials	Australia	China, UAE, USA, New Zealand, France
Maintenance & Repairs	Heat pumps, vanities, door handles,	Australia	USA, China, Cambodia, unknown
Cleaning	Laundry chemicals and PPE	Australia	Europe, Pakistan

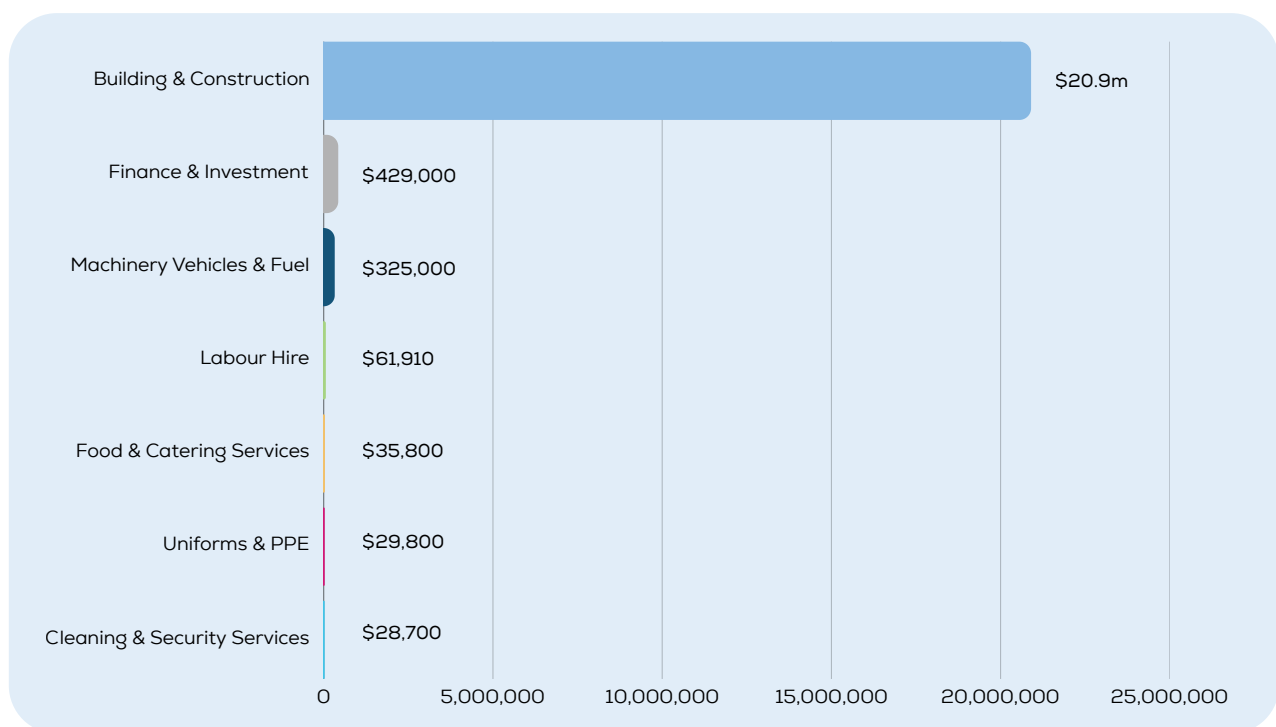
Our Supplier Categories



Procurement Spend Risk Taxonomy



Procurement Spend Profile in High-Risk Categories for Modern Slavery



Supply Chain Risks

Category of Modern Slavery Risks	Summary of Explanation	Summary of Explanation
Sector and Industry Risks	Certain sectors and industries are recognised as having a higher risk of modern slavery due to their characteristics, business models, products and labour practices.	SJAH acknowledges that the electronics sector is globally recognised as higher risk than some other product categories. SJAH also recognises: • The potential for modern slavery risks associated with conflict minerals and materials used as inputs within global supply chains; • The risk of labour exploitation in sectors that supply goods and services commonly used by organisations, including vehicle manufacturing; and • At a domestic level, that cleaning services are considered a higher-risk service industry, as they often involve low-paid and low-skilled workforces that may be vulnerable to exploitation.
Product & Service Risks	Some products and services pose a higher modern slavery risk due to the way they are produced, delivered or used, or where their production has been linked to labour exploitation by international organisations or NGOs.	SJAH recognises the potential for modern slavery risks in logistics and distribution services, including within ICT and telecommunications, uniforms, cleaning, maintenance, hospitality, promotional materials and merchandise. SJAH is also aware of the heightened risks associated with the production of raw materials used in supply chains for vehicles in its fleet, computer equipment, mobile phones and heat pumps.
Geographic Risks	Some countries and regions are associated with higher modern slavery risks due to factors such as weak governance, migration pressures, poverty and limited labour protections.	All SJAH employees are employed within Australia, which is identified in the Global Slavery Index 2023 as having one of the lowest prevalences of modern slavery globally. All employees are directly engaged under contracts of employment and are not labour-hire workers. Notwithstanding this, SJAH acknowledges the potential for geographic-based modern slavery risks within its global supply chains.
Entity Risks	Certain entities may pose higher modern slavery risks due to poor governance practices, inadequate labour standards, or a history of human rights violations.	SJAH is currently assessing modern slavery risks across its operations and supply chains to develop a clearer understanding of entity-specific risks and inform appropriate mitigation strategies.

Criterion 4

Actions taken to assess and address risk



Modern Slavery Policy

In late 2025, the Tier 1 Modern Slavery Policy was reviewed, and the feedback has been consolidated into a revised policy which is due for approval in 2026. The review cemented our commitment to eliminating modern slavery within its operations and supply chains and is supported by the AoH Anti-Slavery Guiding Principles for Suppliers.

The policy review reaffirmed the SJAH's commitment to:

1. Increase awareness about modern slavery and educate and train workers and suppliers about risks of Modern Slavery including:
 - a. Geographic risk (e.g. sourcing from high-risk countries)
 - b. Sector risk (e.g. agriculture, construction, textiles)
 - c. Entity risk (e.g. suppliers with poor labour practices)
2. Require suppliers to comply with the AoH Anti-Slavery Guiding Principles for Suppliers and applicable laws;
3. Insert modern slavery prevention clauses in all tender contracts with suppliers which are identified as "high risk" via the Australian Catholic Anti-Slavery Network (ACAN) procurement taxonomy.
4. Undertake due diligence in relation to procurement of goods and services;
5. Ensure grievance mechanisms are available to report suspected breaches of this policy; and
6. Take action to remedy any breaches of this policy and/or the Guiding Principles.

Modern Slavery Risk Controls

We are focused on embedding the following 7 modern slavery risk controls in purchasing practices as part of a comprehensive and systematic approach that integrates human rights considerations into all stages of the procurement process:

1. **Supplier Due Diligence:** Implement robust due diligence procedures to assess potential suppliers for modern slavery risks before engaging in business relationships. This may involve conducting risk assessments, background checks, and site visits to evaluate supplier practices, labour conditions, and adherence to ethical standards.
2. **Supplier Contracts and Codes of Conduct:** Include clauses in supplier contracts that explicitly prohibit modern slavery and require compliance with relevant laws and international standards. Develop and communicate clear codes of conduct outlining expectations regarding labour rights, fair wages, working conditions, and human rights throughout the supply chain.
3. **Supplier Monitoring and Auditing:** Establish mechanisms for ongoing monitoring and auditing of supplier performance to ensure compliance with contractual obligations and ethical standards. This may involve regular inspections, third-party audits, and performance evaluations to detect and address any instances of modern slavery or labour exploitation.
4. **Training and Awareness:** Provide training and awareness programs for procurement staff and relevant stakeholders to enhance understanding of modern slavery risks, signs of exploitation, and their responsibilities in mitigating these risks. Empower employees to identify and report concerns, and encourage open

communication channels for addressing issues promptly.

5. **Risk Mapping and Assessment:** Conduct thorough risk assessments to identify high-risk areas within the supply chain where modern slavery may be prevalent. This includes mapping out tiers of suppliers, geographical regions, and industries with higher likelihoods of exploitation. Use this information to prioritize risk mitigation efforts and allocate resources effectively.
6. **Supplier Engagement and Collaboration:** Foster collaborative relationships with suppliers based on transparency, dialogue, and shared commitment to ethical sourcing. Engage suppliers in discussions about modern slavery risks, provide guidance and support for improving labour practices, and incentivize responsible behaviour through recognition and rewards.
7. **Continuous Improvement and Evaluation:** Regularly review and evaluate the effectiveness of modern slavery risk controls in purchasing practices. Seek feedback from stakeholders, monitor key performance indicators, and adapt strategies as needed to address emerging risks and evolving regulatory requirements. By embedding modern slavery risk controls in purchasing practices, our organisations are demonstrating a commitment to ethical sourcing, human rights, and social responsibility.



Remediation

SJAH is committed to ensuring it provides appropriate and timely remediation of people impacted by modern slavery in accordance with the Modern Slavery Act 2018. A documented remedy pathway is an important requirement of the Modern Slavery Act. Through the ACAN Program, SJA have access to the expertise and independent advice available through Domus 8.7. SJAH can make referrals of people impacted by modern slavery to obtain support, advice and guidance on how to respond to concerns. The right to remedy is a basic principle in international human rights law. The provision of remedy involves a business implementing actions and processes to investigate and redress negative impacts on people involved in business operations and supply chains, and ensure future incidents are prevented.

Domus 8.7 principles:

- Independent advice and support
- Ensuring people impacted are safe and protected
- Any work undertaken is with the full knowledge and consent of people impacted
- Human rights-based approach

Domus 8.7 overview:

- A vital service and key element of the ACAN Program
- Addresses a key mandatory reporting requirement of the Modern Slavery Act.
- Provides the support needed for a rapid, coordinated response when victims are identified.
- Develops the internal capability to manage risk and engage staff
- Establishes a documented process to manage complex humanitarian issues
- Upholds Catholic Social Teaching
- Ensures ongoing commitment to protecting the human rights of people in operations and supply chains.

Domus 8.7 service profile:

- Guidance and advice for entities who identify slavery
- Coordination with government agencies, victim support organisations and others
- Develop internal capabilities to manage modern slavery risk
- Confidential independent grievance mechanism to report suspected incidents of modern slavery
- Practical and timely support for people impacted by modern slavery

Additional information about Domus 8.7 and the process applied can be found on acan.org.au/domus87



Our Plans for 2026

In 2026, SJAH will be focused on strengthening governance, improving visibility of higher risk suppliers, and embedding modern slavery considerations into procurement and policy frameworks. Actions will be intentionally risk based and proportionate to SJAH's operations, with a focus on continuous improvement.

1. Finalise review of and approve Tier 1 Modern Slavery Policy.
2. Rollout Modern Slavery Training to all current and onboarded employees in 2026 calendar year.
3. Executive Team to undertake Modern Slavery Awareness Training with industry expert.
4. Formally assign executive ownership of modern slavery risk to drive awareness and activities.
5. Engage with a number of higher risk suppliers to improve understanding of supplier practices and risk awareness and ensure grievance mechanisms are accessible and known to contractors.

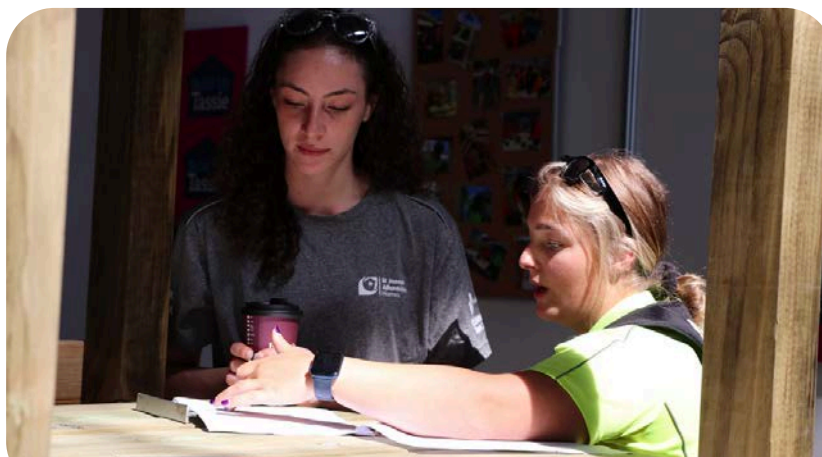
Criterion 5

Effectiveness

SJAH is committed to ensuring that our actions taken to identify, assess and address risks of modern slavery are effective.

During the reporting period, SJAH's capacity to assess the effectiveness of its modern slavery actions was limited due to an organisational focus on establishing key foundational systems, including the implementation of a new Human Resources Information System (HRIS) and a new compliance training platform. These systems are intended to strengthen workforce governance, data integrity and training oversight and are expected to support more effective identification, management and monitoring of modern slavery risks over time. As these systems were in the early stages of implementation during the reporting period, SJAH did not undertake formal effectiveness assessments. SJAH intends to use these strengthened systems to support improved evaluation of modern slavery controls and actions in future reporting periods.

SJAH recognises that assessing effectiveness is an evolving process and is committed to continuous improvement in line with the intent of the Modern Slavery Act 2018 (Cth). Our activities this year, whilst not on the scale of previous years, have created the foundations for future years.



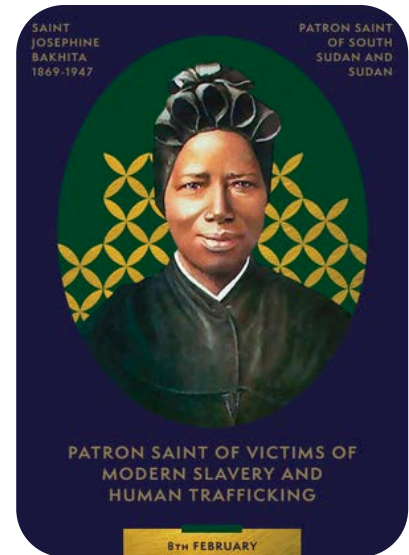
Criterion 6

Consultation and Awareness Activities

International Day of Prayer and Awareness Against Human Trafficking

On 8 February, SJAH observed the Feast Day for St Josephine Bakhita, patron saint of victims of human trafficking and modern slavery in the Chapel. This day invited us to pause, reflect, and renew our commitment to justice and dignity for all. Across Australia, Catholic organisations unite in prayer and action and provides an opportunity to consider how each of us can contribute to ending modern slavery and raising awareness of its impact.

Modern slavery, including human trafficking, forced labour, and forced marriage, remains a grave injustice. It exploits some of the most at-risk people in our communities, stripping women, men, and children of their freedom and fundamental human rights. Through education, awareness, and advocacy, we seek to shine a light on these hidden realities and give voice to those who have felt powerless or unseen.



Criterion 7

No Other Information





Building homes for today and foundations for the future.



Modern Slavery Statement

1 JANUARY – 31 DECEMBER 2025

Disclosure Note

This Modern Slavery Statement (**Statement**) is a joint statement made on behalf of The Catholic Archdiocese of Melbourne (**the Archdiocese**) and the entities it owns or controls or to which it is related (the **Reporting Entities**) in accordance with the requirements of Modern Slavery Act 2018 (Cth) (**The Act**). These entities operate within the broader governance framework of the Archdiocese and are subject to common stewardship oversight through the Archbishop of Melbourne. The Reporting Entities covered by this Statement include:

- The Catholic Archdiocese of Melbourne (**ABN 64 047 619 369**)
- Archdiocese of Melbourne Catholic Development Fund (**ABN 15 274 943 760**)
- Melbourne Archdiocese Catholic Schools Ltd (MACS) (**ABN 18 643 442 371**) and its controlled subsidiaries (Melbourne Archdiocese Catholic Specialist Schools Ltd and Melbourne Archdiocese Catholic Early Years Education Ltd)

For the purposes of this Statement, MACS and its subsidiary Melbourne Archdiocese Catholic Specialist Schools Ltd (MACSS) (**ABN 75 653 741 836**) are reported as a single entity reflecting their common governance arrangements and shared enterprise data systems. In contrast, Melbourne Archdiocese Catholic Schools Early Years Education Ltd (MACSEYE) (**ABN 37 653 741 612**), while also a subsidiary of MACS, is governed by its own Board and maintains separate data systems; accordingly, MACSEYE is reported separately to reflect its distinct governance and operational environment.

This statement was approved and signed by Most Rev Peter A Comensoli, Archbishop of Melbourne on 26 June 2026, as a responsible member of the Archdiocese and its Reporting Entities as defined by the Act.

The Catholic Archdiocese of Melbourne, 486 Albert Street, East Melbourne, VIC 3002 (**ABN 64 047 619 369**) <https://melbournecatholic.org/>



Melbourne Archdiocese
Catholic Schools



MACSEYE



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Statement from

Most Rev Peter A Comensoli, Archbishop of Melbourne



In every age, the call to uphold the dignity of the human person remains at the heart of the Church's mission. Today, that call takes on renewed urgency as we confront the persistent and often hidden reality of modern slavery—an injustice that continues to wound individuals, families and communities across the world, and within our own society.

While modern slavery can seem distant or unseen, recent developments have reminded us that its risks are neither abstract nor remote. They can be present within industries and supply chains that intersect with our daily lives and ministries. This awareness challenges us not only to respond, but to examine more deeply how our choices, partnerships and practices may either contribute to, or help dismantle, systems of exploitation.

As a Catholic community, we are grounded in the conviction that every person is created in the image and likeness of God. Any form of exploitation stands in direct contradiction to this truth. For this reason, our commitment to addressing modern slavery must extend beyond compliance with legislative requirements; it must be an expression of our moral responsibility and our faith in action.

Over the past year, the Catholic Archdiocese of Melbourne has continued to strengthen its approach by embedding modern slavery considerations within a broader culture of stewardship, accountability and risk awareness. This includes more rigorous due diligence, deeper engagement with suppliers and partners, and the integration of modern slavery risks into our wider governance and decision-making frameworks. Such efforts reflect a growing recognition that vigilance, transparency, and informed action are essential in addressing the complexities of this issue.

This Statement, together with the practical measures it outlines, forms part of our ongoing journey from intention to action. It reflects a shift from policy alone to lived practice—where the protection of human dignity informs not only what we say, but what we do.

We remain committed to working collaboratively across the Church in Australia through the Australian Catholic Anti-Slavery Network (**ACAN**), recognising that this challenge requires shared resolve, collective wisdom and sustained effort. Together, we seek not only to reduce risk, but to contribute to a broader culture in which exploitation is not tolerated or concealed.

I express my sincere gratitude to all who have contributed their expertise, diligence and leadership to this work, and to the many staff across the Archdiocese whose daily efforts give concrete expression to our commitment.

As Archbishop, I approve and endorse this Modern Slavery Statement for the Catholic Archdiocese of Melbourne in accordance with the Modern Slavery Act 2018 (Cth) (**the Act**) on 26 June 2026 and affirm our continued participation in the ACAN Program 2023–2026.

May St Josephine Bakhita, who endured the suffering of slavery and became a witness to hope and freedom, intercede for all those who are exploited, and strengthen our resolve to act with justice, courage and compassion.

Yours sincerely in Christ Jesus,

Most Rev Peter A Comensoli
ARCHBISHOP OF MELBOURNE

About us

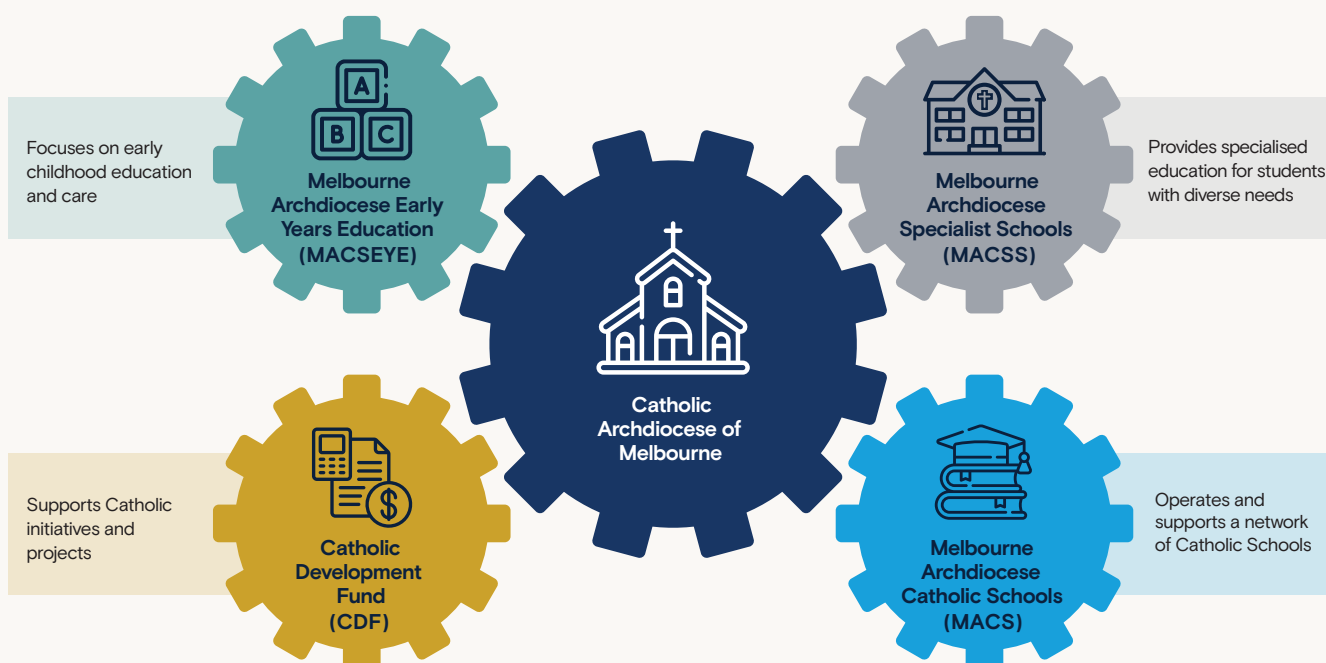
The Catholic Archdiocese of Melbourne (the Archdiocese), together with the Reporting Entities, exists to advance the mission of the Catholic Church in Melbourne. The Archbishop of Melbourne, as the responsible leader and steward of the Archdiocese, oversees a number of entities to support the effective delivery of this mission across diverse areas of activity. These entities operate as ministries or agencies of the Archdiocese, each with a defined purpose aligned to a particular mission priority, while remaining connected through a shared commitment to Catholic values, governance, and accountability.

While this Statement is presented jointly by the Archdiocese and its Reporting Entities, we recognise that each entity operates within distinct contexts, with differing operational structures, workforce profiles, procurement activities and service delivery models that give rise to unique modern slavery risks and risk exposures. The nature, scale and complexity of each entity's operations necessarily influences the types of industries engaged, the volume and diversity of suppliers, and the inherent risks present within their supply chains and operations. This Statement therefore seeks to reflect both our shared commitment to upholding human dignity and the distinct operational realities and risk environments of each Reporting Entity.

This statement does not cover Villa Maria Catholic Homes (**VMCH**). VMCH have produced a separate Modern Slavery Statement for 2025.

All the Reporting Entities are registered as charities with the Australian Charities and Not-for Profits Commission. Annual information statements, financial reports and other information for those entities can be found at www.acnc.gov.au.

Together in Mission: The Archdiocese and its Reporting Entities



Our footprint



194

Parishes



290

Catholic schools



39

Congregational /
PJP Catholic schools



4

Kindergartens



88

Outside School
Hours Care services



22

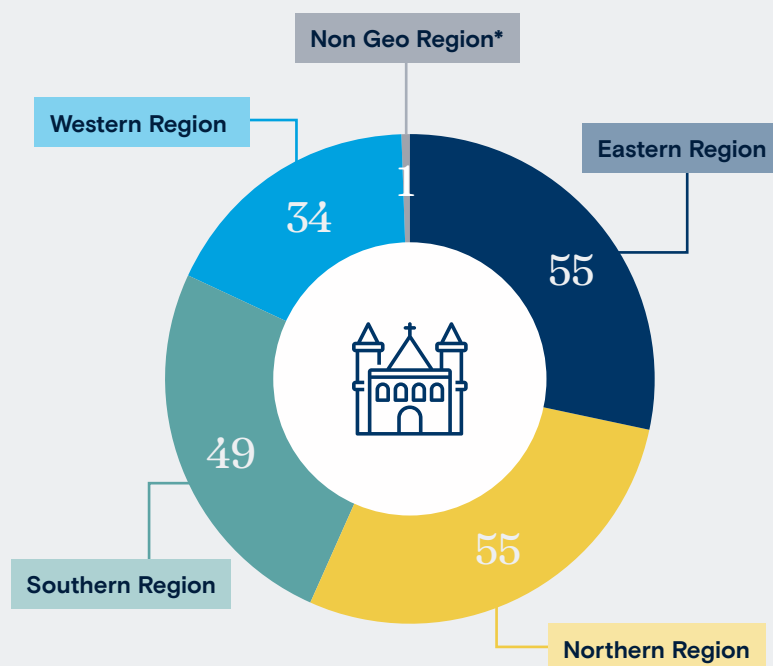
Development Funds
across Australia and
New Zealand (CDF)

Organisational structure and geographical regions

The Archdiocese is the largest Catholic archdiocese in Australia by population. It covers Greater Melbourne and extends across surrounding regions of Victoria, encompassing metropolitan Melbourne, key growth corridors in the north, west and south-east, as well as regional areas including Mansfield, Castlemaine, Geelong, Healesville and the Mornington Peninsula. In practical terms, it spans from dense inner-city communities to outer suburban and semi-regional areas, reflecting a geographically expansive and socio-economically diverse footprint.

The organisational structure of the Archdiocese is displayed in Figure 1 of Appendix A – Organisational charts (Page 40). The Chancery Office of the Archdiocese is located in East Melbourne.

Distribution of Catholic Parishes by Region



*This represents a parish that was established to serve a particular community or pastoral purpose rather than a defined geographic area. Accordingly, it does not fall within the Archdiocese's standard four-region geographical structure.

Profile, operations and workforce

The Archdiocese: Pastoral leadership and mission stewardship



\$83M

The Archdiocese
annual revenue

\$45.3M

total expenditure
(excluding the salaries of staff)

\$50.6M

total procurement spent

1,089

total suppliers

226

total direct employees

30

labour hire
contractors

MACS primary service: System wide Catholic education delivery



\$2.6B

MACS total
consolidated revenue

\$710.1M

total consolidated
expenditure
(excluding the salaries of staff)

\$1.42B

total procurement spent

32,051

total suppliers

17,676

total direct employees

119

labour hire
contractors

MACS consolidated financial figures include Melbourne Archdiocese Catholic Specialist Schools Ltd (MACSS) and MACS Early Years Education (MACSEYE). MACSEYE is disclosed separately due to its distinct governance arrangements.

CDF primary service: Financial stewardship and funding services



\$69.8M

CDF annual revenue

\$9.5M

total expenditure
(excluding the salaries of staff)

\$9.5M

total procurement spent

216

total suppliers

66

total direct employees

1

labour hire
contractors

MACSEYE primary service: Early childhood and school-aged care



\$55M

MACSEYE annual
revenue

\$8M

total expenditure
(excluding the salaries of staff)

\$62.2M

total procurement spent

250

total suppliers

479

total direct employees

482

labour hire
contractors

The Catholic Archdiocese of Melbourne

The Archdiocese serves a diverse and vibrant community of approximately one million Catholics across Melbourne, with 194 parish communities at the heart of its life and mission. United by our shared faith and our love of God and neighbour, our community is a rich tapestry of people of all ages, cultures and backgrounds, seeking to live the way of Jesus Christ in our homes, workplaces and within the wider community.

Presided over by the Archbishop of Melbourne, the life and mission of the Archdiocese are carried out through the worship, witness and charitable works of the Church. This mission is lived most deeply in our parish communities, where faith is nurtured in families, strengthened through communion, and expressed in service to others.

At the heart of the Archdiocese's mission is a preferential concern for those who are most vulnerable — the poor, the marginalised, those living with disability, and those who have experienced harm or exploitation. This concern is not abstract, but is made visible through the charitable, pastoral and educational works of the Archdiocese. Sustained by the love of God, we are called to care for one another and to extend that care to the wider community, making Christ known and present through parishes, ministries and works of the Church.

Supporting this mission, the Archdiocese, through its Chancery, provides a range of advisory and support services to parishes to enable their effective operation and stewardship. These services include, but are not limited to, building and maintenance, financial reporting and governance, human resources, safeguarding, and information technology infrastructure, ensuring that parish communities are well supported in carrying out their pastoral and mission-focused responsibilities.

This mission is supported and extended through a range of related entities and ministries, reflecting the breadth of the Archdiocese's engagement with the community.

Mission and strategy

“

As the Catholic Church in Melbourne, we seek to live the Gospel of Jesus Christ and plant the seeds of faith entrusted to us within our local communities. These communities include our parishes, schools, hospitals, social service agencies, and the many groups, movements and ministries that together form the life of our local Church. In response to Pope Francis' call for a missionary Church, the Archdiocese of Melbourne is committed to an ongoing and intentional pathway of renewal through Take the Way of the Gospel — an invitation for all our people and communities to live the Gospel of Jesus Christ as the heart of our life, worship and outreach.



– Archbishop Comensoli

Governance framework

The Catholic Archdiocese of Melbourne (Chancery) operates as an unincorporated association and is a registered charity, governed by a dual framework of civil and canon law. Under the stewardship and authority of Archbishop Peter A Comensoli, the Archdiocese is supported by a range of governance and advisory structures that guide its strategic, pastoral, and temporal responsibilities. These include the Curia, the Diocesan Finance Council, the Council of Priests, the College of Consultors, and the Trustees of the Roman Catholic Trusts Corporation for the Diocese of Melbourne (RCTC). Together, these bodies ensure that the Archdiocese functions in accordance with its mission, ecclesial obligations, and regulatory responsibilities.

Melbourne Archdiocese Catholic Schools (MACS)

Established by Archbishop Peter A Comensoli, Melbourne Archdiocese Catholic Schools (**MACS**) operates as a company limited by guarantee and is responsible for the governance and operation of parish primary schools and regional and archdiocesan secondary colleges in the Archdiocese of Melbourne, advancing the Church's mission in education.

MACS is the parent entity of Melbourne Archdiocese Catholic Schools Early Years Education Ltd (**MACSEYE**) and Melbourne Archdiocese Catholic Specialist Schools Ltd (**MACSS**), its wholly owned subsidiaries, established to support specific areas of Catholic education. MACSEYE focuses on the governance and operation of early childhood education and care services, while MACSS operates specialist Catholic schools.

Its governance and operation of approximately 290 Catholic primary and secondary schools commenced on 1 January 2021. MACS also provides a range of services to support the 39 congregational and ministerial public juridical person (PJP) schools that are not governed by MACS.



**Educating more than
117,908 students**



**throughout
290 schools**

Mission and strategy

Catholic schooling seeks to provide the young with the best kind of education possible, one that fosters a formation of the whole person that is deeply and enduringly humanising (Francis 2019, n. 223).

“Education is integral to the mission of the Church to proclaim the Good News.
First and foremost, every Catholic educational institution is a place to encounter the living God
who in Jesus Christ reveals his transforming love and truth.”
(Benedict XVI 2008).

This relationship elicits a desire to grow in the knowledge and understanding of Christ and His teaching.

With parents and parishes, Catholic schooling seeks to fulfil this mission by providing an environment in which students are enabled to:

- Encounter God in Christ and deepen their relationship with Him;
- Pursue wisdom and truth encouraged by a supportive academic culture; and
- Grow in the practice of virtue, responsible freedom and serving the common good.

In August 2022, MACS released its inaugural Strategic Plan 2030: Forming Lives to Enrich the World. At the heart of the strategy is MACS' purpose: 'Forming lives of faith, hope and love in the light of Jesus Christ' and vision: 'Every student is inspired and enabled to flourish and enrich the world'.

The strategy has four pillars through which its programs and initiatives are organised, that are: inspired by faith, flourishing learners, enables leaders and enriched communities.

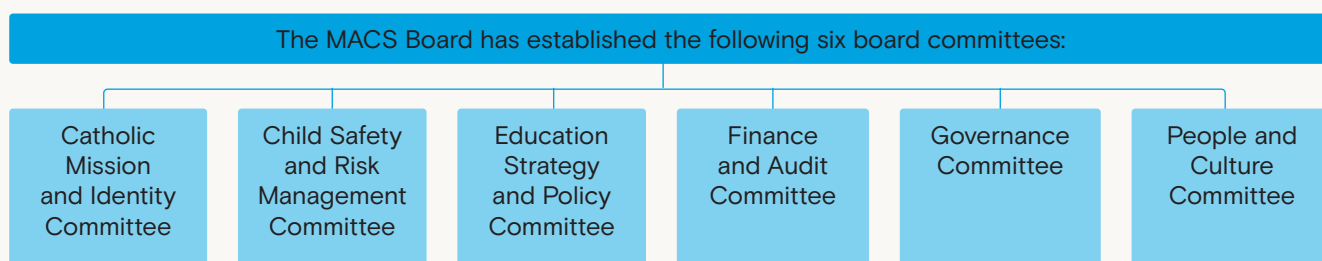
Since its release, MACS has launched several key programs and initiatives to support the delivery of the Strategic Plan to facilitate delivery of the key principles underlying the plan.

Governance framework

MACS operates within a robust governance framework that supports accountability, transparency, and stewardship of Catholic education across the Archdiocese of Melbourne. The MACS Board is responsible for ensuring the organisation meets all fiduciary and strategic requirements and that operations are aligned with its mission and purpose in fulfilment of ecclesial, legal and statutory obligations. The Board is ultimately accountable to its sole Member, the Archbishop of Melbourne.

The Board holds the Executive Director and Executive Leadership Team accountable for the management and delivery of its objectives and implementation of policies.

To support the effective discharge of its responsibilities, the Board is assisted by six committees, each with defined roles and delegated authority. Each Committee operates under a Board-approved Charter and provides advice and recommendations to the Board, which retains ultimate decision-making authority.



This governance structure ensures that MACS operates with strong oversight and in a manner consistent with both its canonical context and its civil regulatory obligations. Modern slavery risks, incidents and emerging issues are reported through MACS' enterprise risk management framework and escalated, where appropriate, to the Board via its Child Safety and Risk Management Committee to support oversight, monitoring and continuous improvement of mitigation and remediation strategies.

The care, safety and wellbeing of children and young people is a central and a fundamental responsibility of MACS. As such, MACS does not tolerate improper conduct by employees or volunteers, and is committed to strengthened practice for the protection of children in line with Victorian Government child safety requirements.

MACS has multiple codes of conduct and follows industry requirements relevant to schools under the Victorian Regulation and Qualification Authority (VRQA).

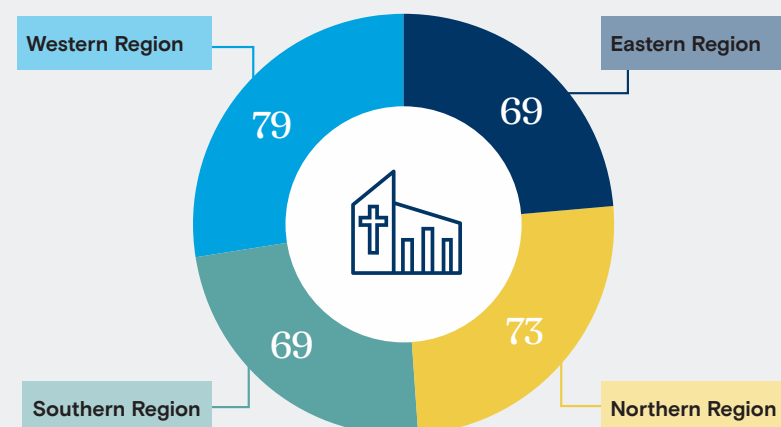
MACS employees and volunteers act in accordance with a range of codes, policies and procedures which support the governance and operation of MACS schools to deliver high-quality education and a nurturing school environment for all students. These include the Child Safety and Wellbeing Policy, Child Safety Code of Conduct, Recruitment Policy, Reportable Conduct Policy, Whistleblower Policy, Responsible Persons Policy, Code of Conduct for School Advisory Councils, Engaging Works through Labour Hire Providers Policy, Duty of Care Policy for MACS schools, Complaints Handling Procedures for MACS Schools and PROTECT – Reporting Obligations Policy.

Organisational structure and geographical regions

MACS Head Office is based in East Melbourne. It is supported by four regional offices in the north (West Melbourne), south (Moorabbin), east (Croydon) and west (Werribee) of Melbourne.

The organisational structure of Melbourne Archdiocese Catholic Schools is displayed in Figure 2 of Appendix A – Organisational charts (Page 41).

Number of schools by region



Melbourne Archdiocese Early Years Education (MACSEYE)

Melbourne Archdiocese Early Years Education Ltd (**MACSEYE**) is a wholly owned subsidiary of MACS and is governed by its own board, established to provide the governance and operational oversight of early childhood education and care services. MACSEYE was founded in 2023 and commenced operations in October 2024.

MACSEYE provides a growing range of early childhood education and school-aged care programs. The services are designed to foster curiosity, wellbeing, identity, and belonging, while supporting families and strengthening school communities.

Mission and strategy

MACSEYE’s strategy is to deliver on the vision that every child is supported to flourish and uncover their potential through provision of early years education and care programs focused on the development of the “whole” child, and fostering a strong sense of identity, health, and wellbeing. The initial phase of this strategy is to ensure service excellence, deliver sustainable growth, and strengthen the MACSEYE enterprise. MACSEYE partners with schools, parishes, and the broader community to support this shared commitment in giving every child the strongest possible start.

Governance framework

MACSEYE is governed by a separate board and operates independently of MACS’ internal board committees. The MACSEYE Board is responsible for the strategic and operational oversight of early years education and care services and for ensuring compliance with relevant laws and regulations, including the Modern Slavery Act 2018 (Cth).

The distinct governance structure of MACSEYE means that it forms part of the MACS Group for the purposes of modern slavery reporting under the Modern Slavery Act 2018 (Cth), however the responsibility for risk management and ethical procurement rests with the entity.

As MACSEYE commenced service delivery in the final quarter of 2024, the early operations have focused on establishing the foundational governance, risk and compliance structures necessary to support ethical operations and ensure compliance with legislative and social responsibilities. The organisational risk, including modern slavery risk, is identified and recorded on the Enterprise Risk Register, presented to an advisory Committee, and subsequently approved by the Board on a bi-annual basis.

In alignment with MACS’ overarching commitment to ethical procurement and human rights due diligence, MACSEYE will continue to progressively embed and enhance modern slavery risk controls as operational activities continue to grow.

Organisational structure and geographical regions

The MACSEYE Head Office is located at the Catholic Leadership Centre in East Melbourne.

As of 31st December 2025, MACSEYE operates 92 services across the Archdiocese of Melbourne including four kindergartens and 88 Outside School Hours Care (OSHC) services.

The organisational structure of Melbourne Archdiocese Early Years Education Ltd (MACSEYE) is displayed in Figure 3 of Appendix A – Organisational charts (Page 42).

MACSEYE Services Breakdown

	Eastern Region	Northern Region	Southern Region	Western Region
Kindergarten	1	3	0	0
OSHC	28	27	17	16

Catholic Development Fund (CDF)

Catholic Development Fund (CDF) was established in 1956 to provide financial services to Catholic organisations across the Archdiocese of Melbourne, including Catholic schools, parishes, healthcare, aged care and social service providers.

CDF advances the mission of the Church through values-based financial services, encompassing lending to Catholic organisations and the management of investments that sustain and grow its social mission across the Catholic community.

Since 1956, CDF has delivered a unique level of financial support to Catholic communities, grounded in Catholic Social Teaching and a commitment to the common good. As the financial needs of Catholic organisations have grown and become increasingly complex, CDF continues to provide lending solutions that may not otherwise be accessible through the traditional banking sector.

Today, CDF operates primarily within the Archdiocese of Melbourne, Diocese of Ballarat, Diocese of Bunbury and Diocese of Sale.

Mission and strategy

CDF exists to meet the financial needs of Catholic organisations, supporting them in building Christ-centred communities that fulfil the Gospel and serve humanity by promoting justice, peace and the dignity of all people. CDF fulfils this mission by pooling the savings of the Catholic community to finance essential infrastructure, including schools, parishes, hospitals, aged care and social service facilities.

CDF's strategy is built around key pillars: trust and governance; systems and services; people and collaboration; and lending and growth. Together, these pillars advance CDF's mission and ensure the long-term sustainability of the Fund and the organisations it serves.

Through disciplined lending, prudent capital and liquidity management, and collaboration within the national Development Fund movement, CDF seeks to deliver long term, mission aligned impact while maintaining a strong licence to operate and protecting the interests of investors, stakeholders and the broader Church community.

To this end, CDF's lending is based on a unique set of criteria when compared to other financial organisations:

- CDF is guided by Catholic Social Teaching that provides a set of principles for building a society based on love, respect and human dignity
- CDF is committed to the common good, and as a Development Fund rather than a bank, has the ability to support its customers responsibly, who may otherwise not be eligible for support from other financial services institutions. In over 60 years of work devoted to the common good and the mission of the Catholic Church, CDF has never registered a bad debt
- Funding from within means Catholic endeavour and enterprises can be relatively self-sufficient, rather than relying on a banking system that may not be able to cater to their unique needs.

Governance framework

Overall responsibility for CDF’s governance, strategic direction, and performance rests with the CDF Advisory Board, which exercises oversight on behalf of the Archbishop of Melbourne as Trustee. The Advisory Board sets organisation-wide governance expectations, approves key strategies, policies and frameworks, and monitors financial performance, risk, compliance, and organisational culture.

The CDF Community Fund Advisory Board and the Board of Catholic Development Fund Community Fund Australian Financial Services Licence Limited (CDFCF AFSL Limited) operate as affiliate boards within the CDF Group governance structure, accountable to the CDF Advisory Board within their respective remits. Each affiliate board discharges its statutory, fiduciary, and regulatory obligations in accordance with its charter and applicable legislation, while operating in alignment with CDF’s strategy, policies, and risk settings.

The CDF Advisory Board has established standing committees, including the Audit and Risk Management Committee, Finance Committee, and People and Culture Committee; each operating under approved charters to provide independent, non-executive oversight of financial reporting, risk management, compliance, capital and liquidity management, people strategy, and organisational culture.

Governance alignment across CDF is reinforced through overlapping board membership, consistent reporting protocols, shared committee structures, and the flow of minutes and key decisions between boards. The framework is further supported by clear delegations of authority, formally approved policies, and a robust risk management and compliance framework aligned with prudential, regulatory, and canonical expectations.

CDF is committed to high standards of governance, ethical conduct, and transparency, recognising that strong governance is foundational to maintaining trust with investors, stakeholders, and the broader Catholic community. The governance framework is reviewed regularly to ensure it remains effective, proportionate, and aligned with CDF’s strategy, risk profile, and mission.

Organisational structure and geographical regions

CDF’s Head Office is based in East Melbourne (VIC), supported by regional offices in Ballarat (VIC), Sale (VIC) and Bunbury (WA), with geographical staffing in these areas.

CDF Head Office also provides a range of services to 22 Development Funds, across Australia and New Zealand, each funding Catholic infrastructure in support of the Church’s mission and their local Diocesan communities.

The organisational structure of CDF is displayed in Figure 4 of Appendix A – Organisational charts (Page 42).

CDF Advisory Board and standing committees



Modern slavery risks in operations and supply chains

For Catholic entities, modern slavery risks are defined by the ACAN Category Risk Taxonomy, a classification standard that identifies severity of actual or potential harm to people (saliency) in spend categories.

The ACAN Category Risk Taxonomy is based on sources such as:

- The Global Slavery Index;
- The International Labor Organisation (ILO), including definitions of modern slavery;
- The Bureau of International Labor Affairs (ILAB), U.S. Department of Labor; and
- The Global Child Forum and UNICEF.

Four key factors are also used to determine the level of risk:

- **Geography:** the country or location where a good is made or service is delivered;
- **Industry:** the sector in which the making of goods or delivery of service occurred;
- **Commodity:** the raw materials or components that comprise the foods or products; and
- **Workforce vulnerability:** such as bonded visas, temporary migrants, women or children known to be employed in specific industry sectors.

Other considerations include trends, cases, and risk intelligence identified through the Domus 8.7 remediation service, including grievances and remediation insights relevant to category and risk to workers. Domus 8.7 offers confidential advice, assessment and remediation support for people impacted by modern slavery, as well as for organisations that may cause, contribute to, or be directly linked to such impacts through their operations or supply chains.

Supply chain risk

The Archdiocese

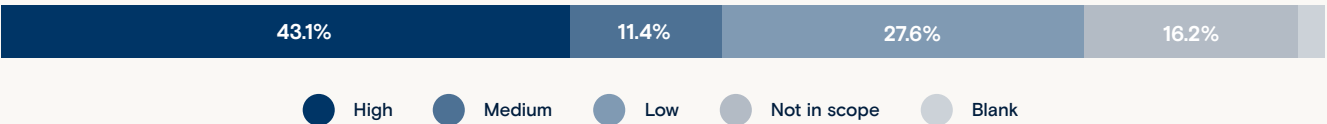
The Archdiocese’s ability to classify and assess procurement data has improved over time, supporting more informed risk identification. In 2023, 72% of the Archdiocesan total spend in procurement was categorised as high risk, indicating a significant exposure to sectors commonly associated with elevated modern slavery risks. By 2024, this exposure reduced to 47%, with a corresponding increase in low-risk (30%) and the introduction of “not in scope” (10%) and “unclassified” (2%) categories.

There have also been developments that reflect a maturing approach to risk assessment and data governance within procurement practices, with the 2025 data demonstrate continued progress. High-risk spend has further reduced to 43.1%, while low risk spend has remained relatively stable at 27.6%. The proportion of spend classified as “not in scope” has increased to 16.2%, indicating enhanced application of the ACAN taxonomy and improved delineation of relevant and non-relevant procurement categories.

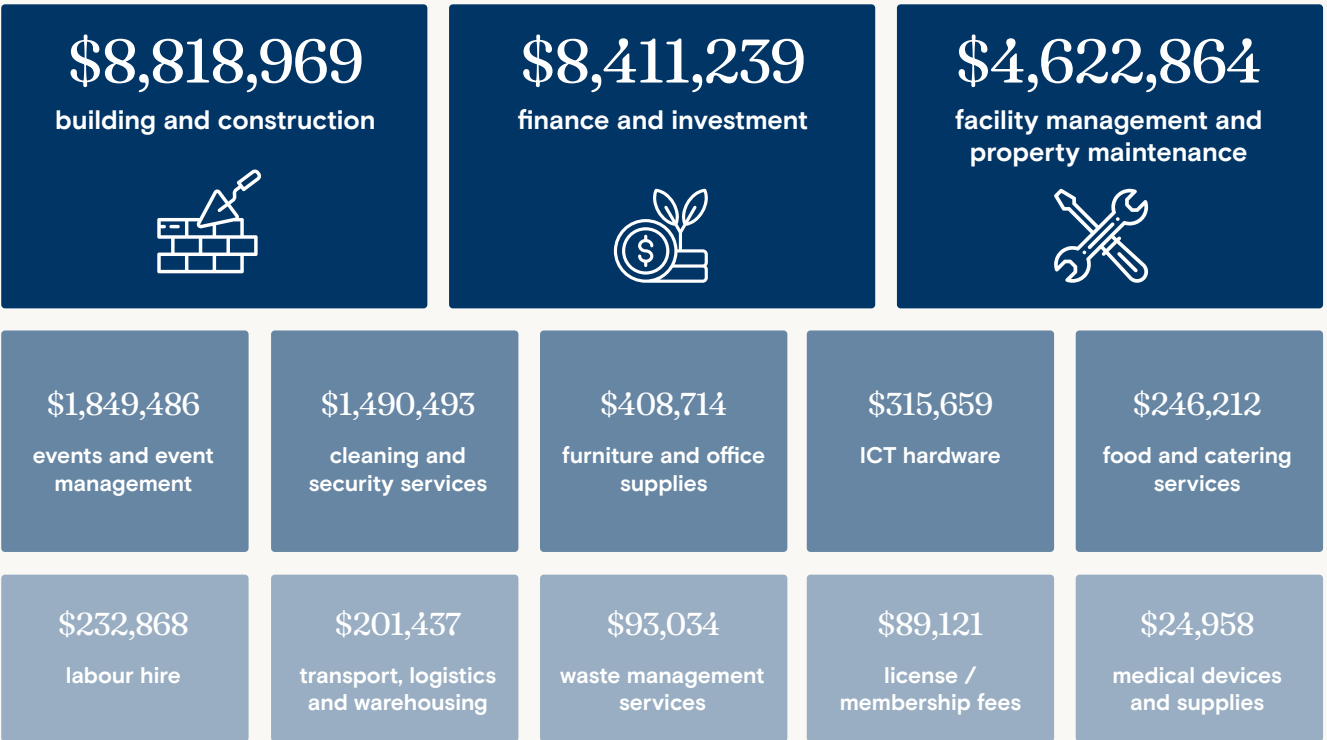
An analysis of the Archdiocese’s 2025 spend on goods and services in these categories is represented in the charts below.

The Archdiocese spend in high-risk categories

Spend profile by risk taxonomy category



The Archdiocese spend in high-risk procurement categories



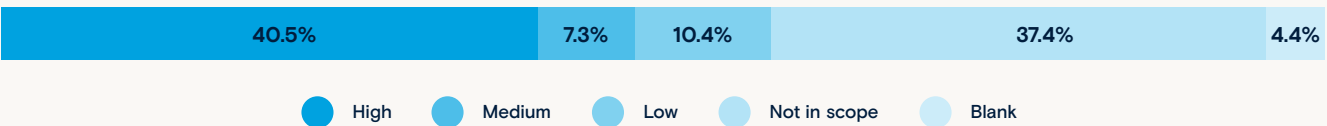
MACS

MACS’ operational risk profile reflects the scale and complexity of one of the largest Catholic education providers in the world, with significant procurement activity and supplier engagement across a number of sectors commonly recognised as presenting elevated modern slavery and labour exploitation risks.

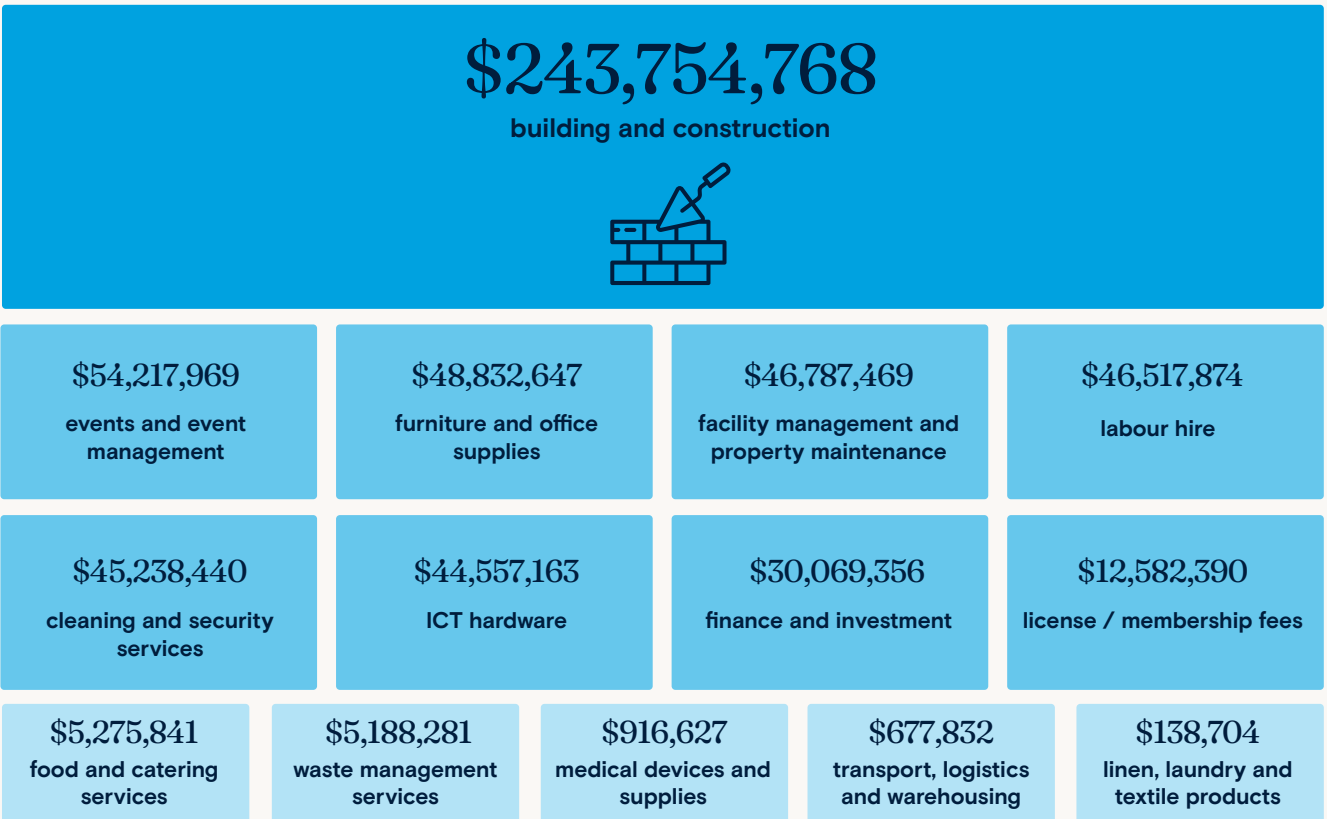
In 2025, MACS’ highest-risk procurement categories by spend included building and construction (\$243.8M), events and event management (\$54.2M), furniture and office supplies (\$48.8M), facilities management and property maintenance (\$46.8M), and labour hire (\$46.5M). These sectors often involve complex supply chains, subcontracting arrangements, outsourced labour models and manufacturing environments that may increase exposure to risks such as worker exploitation, underpayment and unethical labour practices. These risks are further influenced by the scale of MACS’ supplier base, including 5,979 suppliers in furniture and office supplies, 3,697 in facilities management and property maintenance, 2,692 in events and event management, and 558 in building and construction. The combination of significant expenditure and high supplier volumes creates inherent challenges in maintaining visibility and oversight across supply chains, particularly beyond Tier 1 suppliers. MACS therefore continues to prioritise supplier due diligence, procurement governance and risk-based monitoring, and will work collaboratively with suppliers and ACAN to progressively develop risk profiles for major suppliers operating within identified high-risk procurement categories.

MACS spend in risk categories

2025 spend profile by risk taxonomy category



MACS spend in high risk procurement categories



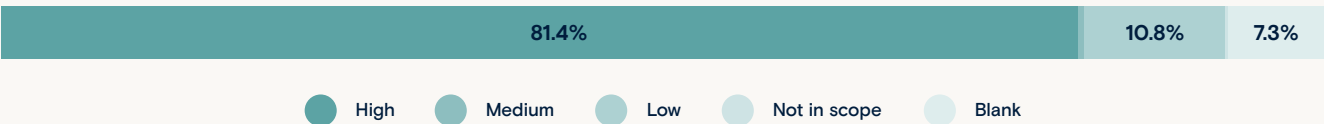
MACSEYE

An analysis of MACSEYE’s 2025 expenditure shows that 81% was categorised as high-risk based on ACAN taxonomy primarily due to its focus on the construction of nine children’s hubs as part of its partnership with the Victorian Schools Building Authority. The construction of the nine hubs resulted in 75% or \$46.5m of 2025 third party supplier expenditure in the high-risk Building and Construction category. Beyond building and construction, the other high risk categories included labour hire (\$1.6M), furniture and office supplies (\$1.2M), food and catering services (\$410K), and facility management and property maintenance (\$267K). To mitigate supply chain risk in this category of spend, MACSEYE adopted MACS’ supplier selection and tender processes in selecting builders for these projects. In addition, ACAN supplier surveys have been completed by four of the five construction companies. Moving forward, completed ACAN supplier surveys will become a precondition for construction companies.

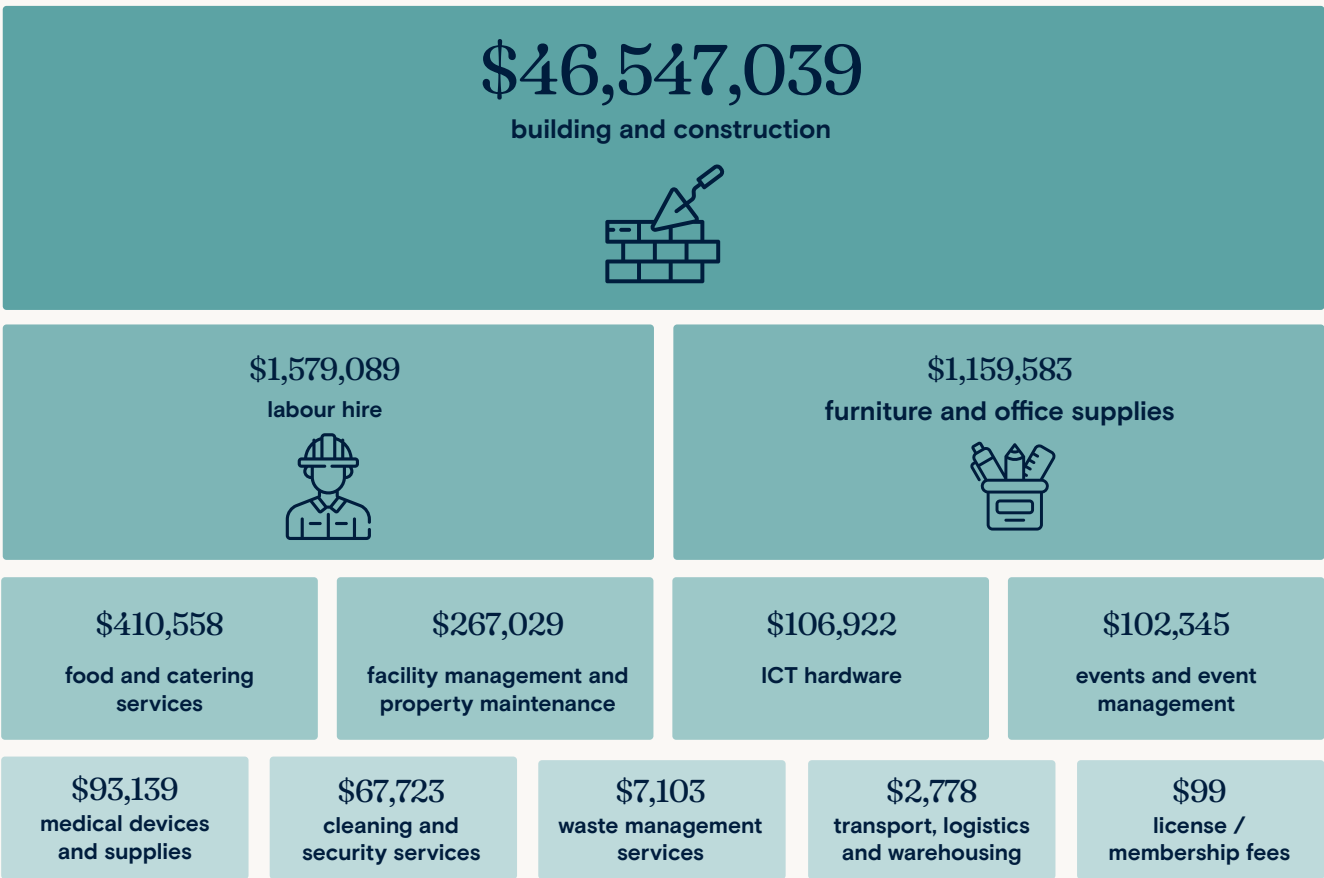
In collaboration with ACAN and MACS, MACSEYE aims to engage with suppliers to develop a risk profile specific to each major supplier across all operational activities.

MACSEYE spend in risk categories

2025 spend profile by risk taxonomy category



MACSEYE spend in high risk procurement categories



CDF

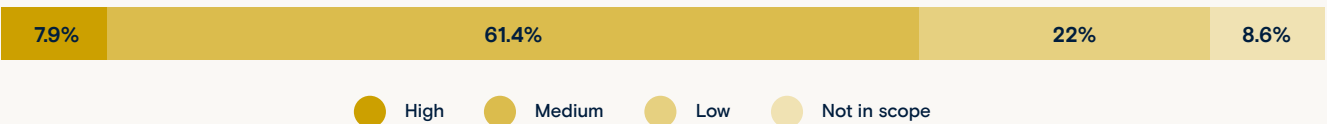
In the ordinary course of business, CDF enters into outsourcing arrangements where specialist expertise, services, facilities or the like are required, and manages these arrangements in accordance with its approved Outsourcing Policy and Risk Management Framework.

While CDF's supplier base and operational footprint are comparatively smaller in scale, CDF recognises the importance of maintaining appropriate oversight across higher-risk procurement activities. CDF therefore continues to strengthen its modern slavery response through ongoing enhancements to governance, supplier due diligence, procurement practices, staff awareness and collaboration with suppliers and ACAN to better identify and manage modern slavery risks across its operations and supply chains.

The following analysis of CDF supply chains is based on the ACAN risk taxonomy across 41 categories of geographic location, industry or sector, commodity, product category and workforce profile.

CDF spend in risk categories

2025 spend profile by risk taxonomy category



CDF spend in high-risk procurement categories

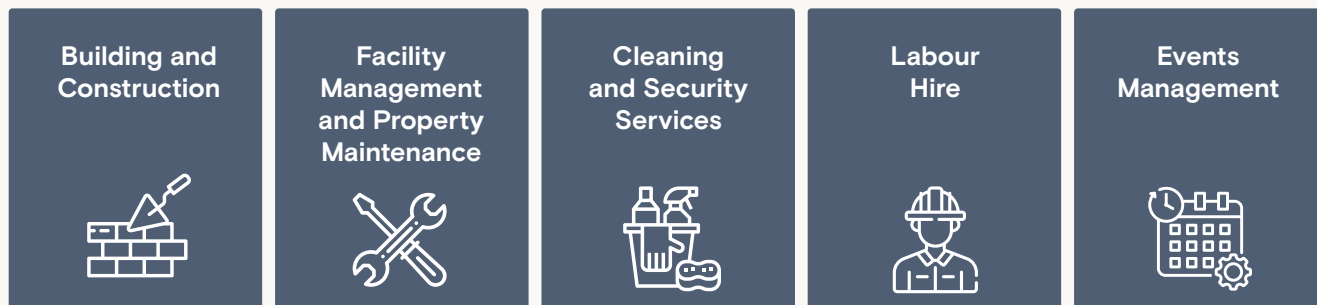


ACAN taxonomy categories by supplier numbers for the Archdiocese and its Reporting Entities



Operational risk

Through the ACAN modern slavery risk management program (ACAN Program), the Archdiocese and its Reporting Entities continue to focus activities with suppliers of labour and the operational risk associated, in the following high-risk labour supply chain areas:



These sectors have been identified through a holistic consideration of available data and operational context, including procurement spend, the volume and diversity of suppliers engaged, and the inherent risk characteristics and structural complexities of each industry.

These industries share common risk features, including complex subcontracting arrangements, fragmented and multi-tiered supply chains, and a reliance on low-paid, temporary or otherwise vulnerable workforces. These factors can reduce visibility over labour practices and increase the risk of exploitation if not actively managed.

Building and construction represents the highest financial exposure across the Archdiocese and its Reporting Entities, whilst facility management and property maintenance present heightened operational complexity due to the scale and volume of suppliers and subcontractors engaged. Cleaning and security services and labour hire services remain priority categories given their well-documented association with elevated modern slavery risks and labor-intensive delivery models.

Events and event management have been identified as an emerging priority risk category in 2025 reflecting both the significant expenditure and high supplier volumes across the Reporting Entities, as well as the nature of contemporary event delivery models. The delivery of events typically relies on multi-layered subcontracting arrangements and a high proportion of temporary, casual or agency labour, often engaged under compressed timeframes. These characteristics can limit end-to-end visibility across supply chains and heighten exposure to risks such as underpayment, excessive working hours, or inadequate labour protections. As such, events and event management represent a convergence of several known modern slavery risk indicators.

In 2025, the Archdiocese engaged 24 suppliers in this category, with total expenditure of approximately \$1.4 million. A significant driver of this activity was the delivery of the Australian Catholic Youth Festival 2025, a large scale national event which involve complex coordination of multiple service providers across logistics, staging, technical production, security, cleaning and catering. In response, the Archdiocese is strengthening its focus on this category through enhanced due diligence, clearer expectations for suppliers, and more deliberate oversight of labour-intensive and subcontracted services associated with major events.

MACS

A key component of MACS' operational profile and modern slavery risk management approach is its workforce composition and employment practices. As one of the largest Catholic education providers in the world, MACS maintains a substantial workforce across schools and corporate operations, requiring robust governance frameworks to support lawful, fair and ethical employment practices across direct employment, visa sponsorship and labour hire arrangements.

In 2025, 17,676 people were employed by MACS, of which a high proportion (96%) work at MACS schools. Of these employees, 81% are women and approximately 98% are Australian citizens or permanent residents. All employees are engaged in Australia and just over 372 staff hold temporary visas. MACS operates in accordance with a specific policy, the Employment and Sponsorship of Visa Holders and Overseas Workers Policy to ensure that when a visa holder is employed or where MACS seeks to sponsor an employee on a visa, that there is compliance with immigration and right-to-work requirements under Australian law.

Conditions of employment for all employees are established for most staff under a multi-enterprise bargaining agreement which provides a wide range of benefits and flexibility to staff. MACS frequently discusses conditions for employees with trade unions across all MACS schools and offices, who act on employees' behalf to represent their interests and in the development of the multi-enterprise agreement. A small proportion of employees are covered by modern awards or common law. On occasion, MACS engages staff through agency and other labour hire arrangements and follows requirements under the Labour Hire Licensing Scheme in Victoria and its policy on Engaging Workers Through Labour Hire Providers, to ensure labour hire agencies are compliant with these requirements.

As listed above and referenced on websites for individual MACS schools or the MACS website, there are a range of policies and codes which govern how MACS operates and these policies are enlivened by the core values of integrity, excellence and respect.

MACSEYE

MACSEYE's highest expenditure in 2025 was primarily in the high-risk Building and Construction industry. However, the nature of expenditure will continue to evolve as MACSEYE transitions from a start-up with a heavy focus on construction to a mix of construction and operational service delivery. Expenditure on labour hire is anticipated to increase as it continues to grow its operational services. Accordingly, MACSEYE will broaden its risk mitigation focus moving forward to include labour hire.

CDF

As part of its Risk Management Framework, CDF maintains a comprehensive suite of policies and frameworks to identify, assess, treat, and monitor operational risks. While CDF is not prudentially supervised by the Australian Prudential Regulation Authority (APRA), it has aligned its practices with APRA requirements and guidance to ensure best-practice risk and compliance management, enabling CDF to operate safely, responsibly, and in service of the Church's mission.

Outsourcing arrangements are assessed as material or non-material based on their potential impact on clients, operations, risk management, regulatory compliance, and CDF's reputation.

All outsourcing arrangements are subject to formal due diligence, risk assessment, and Board or delegated approval, and are governed by legally binding contracts. These contracts address service levels, responsibilities, business continuity and disaster recovery, information security, insurance coverage, and exit provisions. Ongoing oversight is maintained through performance monitoring, periodic contract review, and escalation of issues to management, committees, and the Board, ensuring outsourcing risks are actively managed and remain within CDF's risk appetite.

Actions taken to assess and address risk

Summary of 2025 activities

Throughout 2025, the Archdiocese and its Reporting Entities continued participation in the ACAN Program. Through this program, staff were supported with access to monthly webinars, e-newsletters, practical tools and templates, guidance materials, and structured supplier engagement initiatives.

ACAN supplier engagement

The ACAN Program provides supplier engagement support and data, enabling a systematic and comprehensive supply chain risk assessment. In 2025 the ACAN Program launched a new purpose-built data management platform – ROTA. ROTA centralises the ACAN Risk Management Program framework and facilitates supplier performance evaluation and engagement. The ACAN Program includes:

1. Evaluation of the modern slavery risk within operations and supply chains, using the ACAN Risk Taxonomy;
2. ACAN Supplier Survey to identify supplier revenue, number of employees, countries of origin for goods sourced overseas, workforce contractual arrangements and Sedex membership status. Sedex is an external supply chain risk management and ethical sourcing platform used through the ACAN Program to engage suppliers, gather supplier information, and more;
3. Supplier education on modern slavery and risk management in key areas such as cleaning; building and construction; procurement of labour; labour hire and services; sourcing goods from overseas; grievance mechanisms and remediation;
4. Onboarding suppliers to Sedex;
5. Sedex Self-Assessment Questionnaire (SAQ), which helps suppliers to evaluate their practices against established standards and identify areas for improvement;
6. Desktop review to identify key actions required from suppliers;
7. Enhance supplier screening using Know Your Client (KYC) intelligence software;
8. Corporate Social Compliance Audits which provide a point in time, objective and independent verification process of supplier alignment with local laws and worker wellbeing standards;
9. Domus 8.7 Index modern slavery statement assessment on selected suppliers in high-risk categories; and
10. ACAN Prequalified Supplier Directory – a list of preferred suppliers accessible to Catholic organisations.

During the reporting period, the Archdiocese and its Reporting Entities applied the ACAN framework to assess and address modern slavery risks within their respective operations. This included implementing a coordinated supplier engagement approach, which involved:

- Identifying suppliers operating in high-risk procurement categories using the ACAN Procurement Taxonomy;
- Inviting these suppliers to complete the ACAN Supplier Survey, with a total of 2,152 surveys completed to date across all four entities, including 593 completed during the 2025 reporting period;
- Supporting suppliers to register with Sedex and complete the Self-Assessment Questionnaire (SAQ) with 187 suppliers onboarded to the Sedex platform; and
- Having ACAN Program Managers review SAQ responses to identify gaps in supplier management systems, including areas for further training, capacity building, and risk mitigation, noting a significant increase in the number of suppliers completing SAQs between 2024 and 2025.

The ACAN supplier engagement approach also enabled the identification of common suppliers across participating Catholic entities. This facilitated a more coordinated and efficient engagement process, strengthening collective leverage while reducing duplication of effort. As part of this program, suppliers engaged by the Archdiocese and its Reporting Entities were also invited to participate in the 2025 ACAN webinar series, which aimed to build foundational awareness and understanding of modern slavery risks and responsibilities.

In addition to these activities, the Archdiocese also undertook a series of targeted activities to strengthen its approach to identifying and managing modern slavery risks within a broader enterprise risk management framework, including:

- Development of a Risk Management Implementation Plan to support the structured rollout and embedding of organisational risk practices;
- Articulated a Risk Appetite Statement to guide risk-informed decision-making across the organisation;
- Established an initial enterprise-wide risk register through which modern slavery risks are now formally captured, assessed and monitored alongside other organisational risks;
- Strengthened supply chain risk oversight by engaging closely with Cushman & Wakefield, a newly appointed Facilities Manager, to assess and gain assurance over their modern slavery risk management frameworks and supplier controls across facilities management services;
- Embedded modern slavery considerations into standard contracting practices, with all new and renewed contracts incorporating consistent modern slavery clauses; and
- Delivered targeted training to operational areas engaged in medium- to high-risk procurement, building capability in identifying modern slavery risk indicators.

The Archdiocese further enhanced the application of ACAN risk taxonomy by:

- Strengthened data quality, consistency and reliability through refined data classification and validation processes;
- Embedded risk-informed procurement practices across high risk operational areas such as Property and Infrastructure and Finance; and
- Strengthened supplier due diligence and engagement within high- and medium-risk procurement categories.

Overall, these initiatives reflect a maturing and increasingly integrated approach to modern slavery risk management across operations and supply chains.

In addition to these activities, MACS delivered its 2024 modern slavery action plan as it:

- Added modern slavery management to the enterprise, Finance Directorate and schools risk registers;
- Increased awareness of the risks of modern slavery in our operations and supply chains by uploading the 2024 statement on the Intranet and Internet sites. Internal staff and the public now have access to the commitments being made to manage modern slavery risk; and
- Launched **MACSLearn**, the Learning Management System, and making available the ACAN e-learning module 'Modern Slavery 101 – Introduction to Modern Slavery'.

MACSEYE commenced participation in the ACAN program and undertook the following:

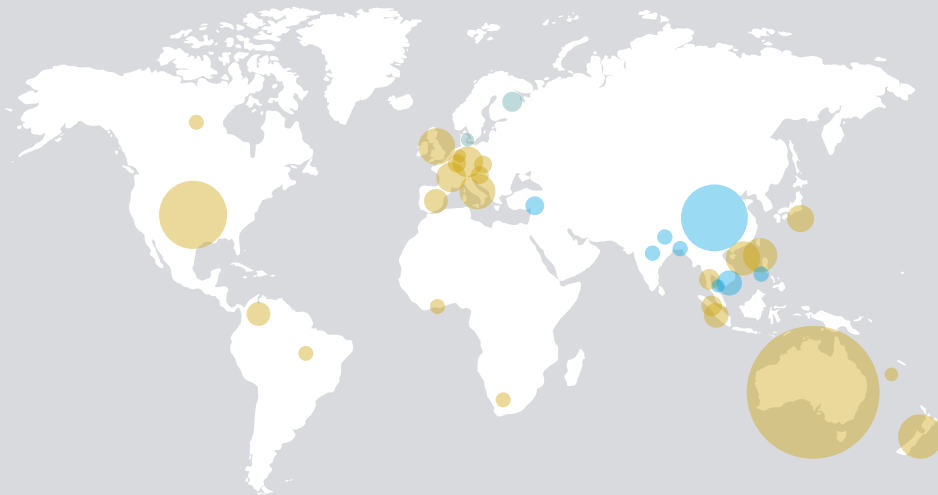
- Developed a baseline modern slavery risk assessment based on expenditure incurred during the 2025 calendar year which was its first full year of operation;
- Identified internal roles responsible for mitigation and/or oversight of modern slavery risks and plans to introduce ACAN eLearning into the role-based training requirements for these roles; and
- Commenced integrating modern slavery considerations into procurement and risk management activities.

33,500 total unique suppliers

14,857 suppliers in high risk procurement categories

Sourcing Countries for tier 1 suppliers

Overall inherent risk ● High ● Medium ● Low



Supplier screening – ACAN collated



529

enhanced 3rd party supplier screening



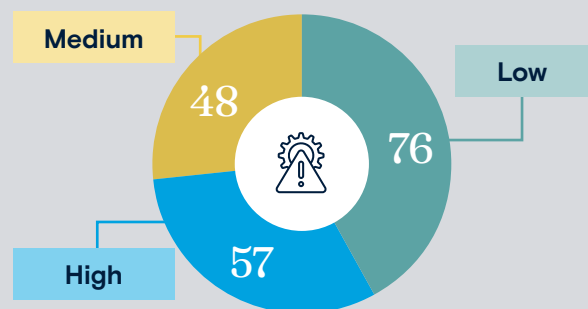
25

3rd party supplier screening – high and medium risk

187
suppliers on Sedex

135
SAQs completed

Sedex SAQ Risk Category



2,152

ACAN supplier surveys completed

593

ACAN supplier surveys completed in 2025



440 suppliers identified for Sedex onboarding

18
audits in 2025

135
audit findings in 2025



1,321
supplier e-mail shared



6,612
supplier communication



36
suppliers completing e-learning

Remediation and response

Entities engaged Domus 8.7, a key element of the ACAN Program, to provide specialist and independent remediation support services. Domus 8.7 offers confidential advice, assessment and remediation support for people impacted by modern slavery, as well as for organisations that may cause, contribute to, or be directly linked to such impacts through their operations or supply chains. Aligned with the reporting criteria under the Act and informed by Catholic Social Teaching, this approach supports a structured, ethical and compassionate response centred on the needs, wellbeing and empowerment of impacted persons, while also strengthening organisational visibility and informing continuous improvement in modern slavery risk management.

Domus 8.7 provides a range of specialist services aimed at strengthening prevention, identification and remediation responses to modern slavery. These include:

- Resources and grievance mechanisms that support organisations to listen safely and effectively to workers;
- A 24/7 careline staffed by professional counsellors for workers engaged across participating sites and supply chains;
- Specialist guidance and technical assistance to help organisations identify, assess and respond to modern slavery risks and indicators;
- A documented framework for assessing whether an organisation may have caused, contributed to, or be directly linked to modern slavery risks or impacts;
- Direct support and case coordination for people impacted by modern slavery, including needs assessments and remediation planning;
- Referrals and connections to community services, unions, legal and social support providers;
- Practical assistance where required, including transport, accommodation, financial and food support;
- Support with job training, retraining and redeployment opportunities;
- Advocacy and accompaniment to assist engagement with government and law enforcement agencies where appropriate; and
- Opportunities for people with lived expertise to contribute to and strengthen modern slavery response practices and organisational learning.

Domus 8.7 adopts a victim-centred and trauma-informed approach that empowers people impacted by modern slavery to have choice and control over the forms of remediation and support that are meaningful to them. The Domus 8.7 Advisory Committee includes a person with lived expertise, Mr Moe Turaga. Domus 8.7 is a registered charity with the Australian Charities and Not-for-profits Commission (ACNC) and an endorsed Public Benevolent Institution with Deductible Gift Recipient (DGR) status.



Case study

The following case study demonstrates how access to Domus 8.7 supported a proactive and worker-centred response where potential labour exploitation concerns were identified within the supply chain. While no formal findings of modern slavery were established, the matter highlighted the importance of having independent remediation pathways and support mechanisms available for impacted workers.

In December 2025, MACS' security services supplier, MA Services Group, entered administration amid allegations of worker underpayments and tax evasion. As part of the transition process to the administrator's recommended supplier, Allied Security, six affected security personnel were offered access to independent remediation and support services through Domus 8.7. While none of the workers elected to access these services, the availability of confidential and independent support formed an important part of MACS' response.

The matter also reinforced the importance of ongoing supplier oversight within higher-risk labour-intensive sectors. Accordingly, the MACS Procurement Team will undertake a tender process for ongoing security services across its office sites during 2026.

Action Plan 2026-2030

The 2026 Action Plan represents a continuation of the 2025 program of work across the Archdiocese and its Reporting Entities, reflecting a rolling and iterative approach to strengthening modern slavery risk management frameworks. It incorporates both initiatives carried forward from prior years, and additional actions identified through ongoing risk assessment and capability development. While framed for 2026, the Action Plan is intended to support a multi-year uplift program, with several initiatives expected to extend over the next three to four years and continue to evolve in future reporting periods.

The Archdiocese and its Reporting Entities will expand the use of Sedex in 2026 to strengthen modern slavery risk management, including assessing existing suppliers, screening new suppliers, validating risk levels, improving supply chain visibility, and monitoring supplier performance over time. In addition, ACAN e-learning modules will be embedded into internal Learning Management Systems to enhance staff capability, oversight, and accountability. These modules cover foundational awareness, business relevance, implementation of risk management programs, and grievance and remediation processes.

The following pages contain a detailed overview of action plans for the Archdiocese and its Reporting Entities.

The Archdiocese

In addition to the specific actions carried forward from the 2025 Action Plan, the Archdiocese will, in 2026 and beyond, focus on the following priority areas: enhancing the quality, consistency and completeness of supplier data to support more effective risk identification, monitoring and decision-making; deepening supplier due diligence and accountability; expanding internal capability and awareness through broader training programs; developing worker voice and remediation pathways, and establishing strengthened governance and oversight mechanisms.

Action	Status
Management systems	
Continue to develop policies, principles and processes and integrate these into management tools	Ongoing
Work to integrate anti-slavery into governance structure and define metrics to measure, manage, enhance reporting capabilities and develop KPIs	Ongoing
Risk management	
Continue working with partners to update risk management framework and define how to measure and understand risk in operations and supply chains	Ongoing
Develop a process to periodically review and update the risk management framework, as understanding of modern slavery risk matures	In progress
Deepening supplier due diligence and accountability	Planned
Developing worker voice and remediation pathways	Planned
Establishing governance and oversight mechanisms, including a role responsible for overseeing progression of the Action Plan	Planned
Procurement and supply chain	
Inform suppliers of anti-slavery measures, including updated contract clauses, supplier code of conduct and tender requirements	Complete
Strengthening data integrity and supplier visibility by enhancing the quality, consistency and completeness of supplier data to support more effective risk identification, monitoring and decision-making	Planned
Undertake supplier engagement via ACAN e-learning and on-boarding to Sedex, monitor and report on Sedex SAQ results	Ongoing
Develop protocols for reviewing suppliers and for following up on adverse findings	In progress
Roll out updated contract clauses, supplier code of conduct and tender requirements	Complete
Human resources and recruitment	
Activate the ACAN e-learning modules and make available to staff, boards and senior management	Partially complete
Expanding internal capability and awareness by broadening training programs and embedding modern slavery risk awareness across key functions, particularly those involved in procurement, contract management, and third-party engagement	Planned

MACS

Action	Status
Management systems	
Configure and embed modern slavery risk in MACSGuard (risk taxonomy, owners, review cadence) and publish a quarterly dashboard/reporting pack (top risks, supplier due diligence status, open actions)	In progress
Standardise a modern slavery control library and introduce a risk-based assurance/testing program (sampling and control checks), with actions tracked to closure in MACSGuard	Planned
Implement mandatory procurement “gates” so defined triggers (e.g., labour hire/cleaning/security/construction or spend thresholds) require a documented modern slavery risk assessment and sign-off before award	Planned
Establish supplier corrective action plans for priority/high-risk suppliers (e.g., Sedex SAQ gaps, subcontractor transparency), tracked and evidence-based in MACSGuard, with follow-up review cycles	Planned
Commission an independent effectiveness review of the modern slavery control framework (design + operating effectiveness) and refresh the next multi-year roadmap based on findings, tracked in MACSGuard	Planned
Risk management	
Establish and maintain a modern slavery risk register in MACSGuard (aligned to ACAN taxonomy), including defined risk owners, review cadence, escalation thresholds and quarterly reporting to governance	In progress
Implement a risk-based assessment and assurance cycle for priority/high-risk suppliers (due diligence, periodic reviews and action tracking) and record outcomes and remediation actions in MACSGuard	Planned
Embed mandatory modern slavery risk “gates” in procurement/contracting processes for defined triggers (e.g., labour hire, cleaning/security, construction and/or spend thresholds), with sign-off and evidence captured in MACSGuard	Planned
Introduce modern slavery KRIs/KPIs and trend reporting (e.g., % high-risk suppliers assessed, overdue actions, repeat findings, SAQ completion) to drive performance and accountability, reported through established governance forums	Planned
Undertake an internal or independent review of the effectiveness of modern slavery risk controls (design and operating effectiveness) and refresh the next 3–5 year uplift roadmap based on findings	Planned

Procurement and supply chain	
Finalise and implement enhanced RFX templates (RFQ/RFP/tender) and tender evaluation guidance to consistently capture and assess suppliers' modern slavery risk controls, subcontracting arrangements and evidence	In progress
Update the Procurement and Contract Management Policy and supporting procedures to embed risk-based modern slavery due diligence requirements (including triggers, minimum evidence, approvals and recordkeeping)	Planned
Implement a structured supplier due diligence cycle for priority/high-risk categories (ACAN/ Sedex onboarding, SAQ review, follow-up questions) and establish a standard corrective action plan (CAP) approach for identified gaps	Planned
Embed modern slavery monitoring into contract management for priority suppliers (scheduled reviews, subcontractor transparency, incident/red-flag escalation and reporting) and track performance using agreed procurement KPIs/KRIs	Planned
Review and uplift the end-to-end procurement due diligence framework (including effectiveness of controls and supplier outcomes) and refresh the next multi-year procurement modern slavery roadmap based on lessons learned and trend results	Planned
Human resources and recruitment	
Implement modern slavery training in MACSLearn for relevant staff via new starter induction and targeted role-based learning for People & Culture, school HR/leadership roles, and managers engaging contractors/labour hire	In progress
Embed modern slavery risk controls into recruitment and onboarding processes (e.g., right-to-work/visa verification, agency and contractor onboarding checks)	In progress
Strengthen labour hire and contractor management requirements (approved provider list/ controls, minimum contract terms, periodic compliance attestations, and escalation pathways for addressing non-compliant or breach of contract behaviours), aligned to the Victorian Labour Hire Licensing Scheme and MACS policies	Planned
Build internal assurance around HR-related controls (sample-based checks of labour hire engagements, contractor onboarding records, and visa/right-to-work compliance), with findings and actions tracked to closure	In progress
Review effectiveness of HR and recruitment modern slavery controls (training completion and effectiveness, labour hire compliance outcomes, incident trends) and refresh the next multi-year People & Culture uplift plan	Planned

MACSEYE

Action	Status
Management systems	
Develop a Modern Slavery Action Plan aligned with MACS Group expectations and tailored to early years education and care	Revised annually
Identify internal roles responsible for modern slavery risk management and governance oversight	Complete
Risk management	
Undertake a baseline modern slavery risk assessment for MACSEYE's operations and key supplier categories	Complete
Embed modern slavery risk management into overall enterprise risk management framework	In progress
Procurement and supply chain	
Commence integrating modern slavery considerations into procurement activities and supplier onboarding	In progress
Analyse existing high-risk suppliers to determine any remedial actions required (i.e. Sedex participation, discontinued use, etc.)	Planned
Human resources and recruitment	
Identify relevant staff to complete ACAN e-learning modules on modern slavery awareness	Complete
Embed ACAN e-Learning into ongoing role-based training requirements	Planned

CDF

Action	Status
Management systems	
Continue to develop policies, principles and processes that address modern slavery and integrate these into everyday practices	In progress
Integrate anti-slavery ACAN assessment into governance structures	In progress
Risk management	
Ensure ongoing uplift of Risk Management Framework, which includes risk culture, to identify, assess, monitor and manage risk in operations and supply chains	In progress
Ensure Risk and Compliance related policies remain up to date and appropriate to the CDF Group	Complete
Ensure visibility of Domus 8.7 independent remediation service	Complete
Procurement and supply chain	
Inform outsourcing service providers or suppliers of anti-slavery measures, including updated contract clauses	In progress
Implement outsourcing service provider or supplier due diligence via ACAN as part of onboarding and ongoing contract review processes	In progress
Implement process for ongoing supplier review including following up on adverse findings	In progress
Implement updated contract clauses that extend to anti-slavery measures	In progress
Human resources and recruitment	
Implement Modern Slavery Awareness training	In progress

Measuring effectiveness

The Archdiocese

The Archdiocese assesses the effectiveness of its actions to address modern slavery risks through a combination of quantitative metrics, trend analysis, and ongoing review of internal capability and supplier engagement activities. This includes monitoring key indicators such as staff training participation, supplier engagement through platforms such as ACAN and Sedex, the number of suppliers identified within higher-risk categories, and the extent of due diligence activities undertaken, including supplier self-assessments, audits, and corrective actions.

Over the reporting period, the Archdiocese has observed a significant increase in the level of effort dedicated to modern slavery risk management, alongside a marked uplift in supplier engagement and improved identification of higher-risk suppliers. These trends reflect a transition from foundational awareness to a more structured and targeted approach. At the same time, the Archdiocese recognises that further work is required to ensure consistency and depth across its program. In particular, variability in supplier data quality, relatively low completion rates of detailed supplier self-assessment questionnaires, and limited audit and remediation activity highlight areas for continued focus.

Strengthening these mechanisms will be an important area of focus to improve visibility of potential impacts and to support appropriate responses where risks are identified.

These insights are used to inform a rolling, multi-year action plan as outlined above.

The Archdiocese baseline data

Activity	2023 Catholic Archdiocese of Melbourne	2024 Catholic Archdiocese of Melbourne	2025 Catholic Archdiocese of Melbourne
Internal / staff			
Hours spent on modern slavery activities	50	55	200
Individual staff completed e-learning	0	0	13
E-learning modules completed	0	0	13
External / supplier engagement			
Total number of suppliers	1156	974	1089
Number of suppliers with visible contact information and ABN	45	889	41
Number of suppliers across high-risk categories	31	220	264
Number of ACAN Supplier Surveys completed	4	90	139
Supplier staff attending capacity building webinars	3	6	17
Invited to join Sedex	0	18	41
Joined Sedex	1	29	28
Sedex SAQ completed	2	7	12
Social audits	1	1	1
Corrective actions	0	25	4
Domus 8.7 external referrals			
Contacts made via worker voice/grievance mechanism	0	0	0
Referrals for advice and assistance	0	0	0
Individuals identified or referred for modern slavery assessment	0	0	0
Individuals with modern slavery cases remediated	0	0	0

MACS

MACS assessed the effectiveness of the 2025 actions by linking delivery to measurable outcomes, and reviewing how these activities improved visibility and strengthened controls.

This included reviewing results from the ACAN-led supplier engagement program (including the identification and engagement of high-risk suppliers, ACAN Supplier Surveys completed during 2025, Sedex onboarding activity, and ACAN review of SAQ responses to identify material gaps and priority areas for capacity building) and confirming what follow-up actions were undertaken (for example, additional supplier engagement, capability building, corrective actions, escalation decisions, and changes to supplier selection and contracting where required).

MACS also assessed whether entity-specific actions were embedded in business-as-usual processes, including the incorporation of modern slavery risks into enterprise/directorate/school risk registers with clear ownership and escalation pathways, improved accessibility and awareness through publication of the Modern Slavery Statement, and establishment of MACSLearn with access to the ACAN e-learning module to support role-based capability uplift. Learnings from this assessment were used to inform the development of MACS' 2026 to 2030 action plan, prioritising system-enabled reporting and accountability, risk-based procurement controls, strengthened supplier due diligence and follow-up, and ongoing workforce capability building.

MACS baseline data

Activity	2023 Melbourne Archdiocese Catholic Schools	2024 Melbourne Archdiocese Catholic Schools	2025 Melbourne Archdiocese Catholic Schools
Internal / staff			
Hours spent on modern slavery activities	60	85	100
Individual staff completed e-learning	0	9	0
E-learning modules completed	0	45	48
External / supplier engagement			
Total number of suppliers	30579	31765	32051
Number of suppliers with visible contact information and ABN	13897	1	1220
Number of suppliers across high-risk categories	10254	8369	14511
Number of ACAN Supplier Surveys completed	849	1305	2010
Supplier staff attending capacity building webinars	344	54	36
Invited to join Sedex	370	183	164
Joined Sedex	57	151	169
Sedex SAQ completed	17	111	129
Social audits	2	17	18
Corrective actions	0	75	135
Domus 8.7 external referrals			
Contacts made via worker voice/grievance mechanism	0	0	0
Referrals for advice and assistance	0	0	1
Individuals identified or referred for modern slavery assessment	0	0	6
Individuals with modern slavery cases remediated	0	0	0

MACSEYE

During 2025, MACSEYE laid the foundation for effective modern slavery risk management by identifying the roles responsible for modern slavery risk management and oversight, introducing the ACAN e-learning modules into the suite of role-based training for these roles and undertaking a baseline modern slavery risk assessment of MACSEYE's 2025 third party expenditure by key supplier category based on ACAN's taxonomy. MACSEYE will continue to work with ACAN to ensure material suppliers participate in the Supplier Ethical Data Exchange (**Sedex**).

As 2025 represents MACSEYE's first full year of operation, the data reported for this period has been adopted as the baseline against which future performance and year on year improvements will be measured.

Activity	2024 MACSEYE	2025 MACSEYE
Internal / staff		
Hours spent on modern slavery activities	0	28
Individual staff completed e-learning	0	0
E-learning modules completed	0	0
External / supplier engagement		
Total number of suppliers	0	250
Number of suppliers with visible contact information and ABN	0	250
Number of suppliers across high-risk categories	0	104
Number of ACAN Supplier Surveys completed	0	95
Supplier staff attending capacity building webinars	0	15
Invited to join Sedex	0	29
Joined Sedex	0	26
Sedex SAQ completed	0	17
Social audits	0	0
Corrective actions	0	0

CDF baseline data

Activity	2023 Catholic Development Fund	2024 Catholic Development Fund	2025 Catholic Development Fund
Internal / staff			
Hours spent on modern slavery activities	15	15	60
Individual staff completed e-learning	0	0	0
E-learning modules completed	0	0	0
External / supplier engagement			
Total number of suppliers	207	191	216
Number of suppliers with visible contact information and ABN	0	172	189
Number of suppliers across high-risk categories	41	45	32
Number of ACAN Supplier Surveys completed	20	30	52
Supplier staff attending capacity building webinars	0	4	16
Invited to join Sedex	0	1	5
Joined Sedex	5	18	14
Sedex SAQ completed	0	2	4
Social audits	0	0	0
Corrective actions	0	0	0
Domus 8.7 external referrals			
Contacts made via worker voice/grievance mechanism	0	0	0
Referrals for advice and assistance	0	0	0
Individuals identified or referred for modern slavery assessment	0	0	0
Individuals with modern slavery cases remediated	0	0	0

Domus 8.7 external referrals for the Archdiocese, MACS, MACSEYE and CDF

Activity	2023 The Archdiocese, MACS, MACSEYE, and CDF	2024 The Archdiocese, MACS, MACSEYE, and CDF	2025 The Archdiocese, MACS, MACSEYE, and CDF
Domus 8.7 external referrals			
Contacts made via worker voice / grievance mechanism	0	0	0
Referrals for advice and assistance	0	0	1
Individuals identified or referred for modern slavery assessment	0	0	0
Individuals with modern slavery cases remediated	0	0	0

Continuous improvement

The Archdiocese continues to progress from a foundational approach toward a more structured and targeted program for managing modern slavery risks. Overall maturity is assessed as developing, progressing toward a more defined and embedded state. Analysis of program data indicates a significant uplift in effort and engagement during the reporting period. This includes increased internal resourcing, stronger supplier engagement through initiatives such as ACAN and Sedex, and improved identification of higher-risk suppliers across key procurement categories. These developments reflect a growing level of maturity and a more intentional approach to risk management.

Key areas for continued focus include strengthening data integrity and supplier visibility, increasing the depth and coverage of due diligence activities (including supplier self-assessments and audits), embedding capability across relevant internal functions, and improving visibility of potential impacts within supply chains, including through worker voice and remediation pathways.

MACS' priorities are to evolve and mature the approach to managing modern slavery risks in operations and supply chains through the following activities:

- Progressively embed modern slavery governance, controls, reporting and action tracking within core management systems (e.g., MACSGuard) to improve visibility, accountability and decision-making over time
- Maintain a modern slavery risk register with defined owners, review cycles, escalation thresholds, assurance activities and meaningful KRIs/KPIs to support a consistent, risk-based approach and continuous improvement
- Embed modern slavery due diligence into sourcing and contracting (RFX requirements, risk "gates", supplier onboarding and contract management) and use supplier engagement and corrective action plans to lift supplier practices in priority/high-risk categories
- Strengthen internal capability and workforce-related controls through role-based training, recruitment/onboarding checks, labour hire and contractor oversight, and periodic assurance to identify and respond to modern slavery red flags.

MACSEYE's priorities are to:

- Implement training programs to build staff capability and awareness of modern slavery risks, especially for roles involved in purchasing and contractor management activities
- Proactively engage ACAN identified high-risk category suppliers to join SEDEX and complete self-assessment questionnaires (SAQ)
- Establish and integrate modern slavery risk management protocols at each stage of the procurement process, including proposal development, tender evaluations, contract award, contract management, and supplier onboarding.

CDF's priorities are to:

- Continue to develop policies, principles and processes that address modern slavery and integrate these into everyday practices
- Integrate anti-slavery ACAN assessment into governance structures
- Ensure ongoing uplift of the Risk Management Framework and supporting policies and frameworks (including risk culture), to identify, assess, monitor and manage risk in operations and supply chains
- Inform outsourcing service providers or suppliers of anti-slavery measures, including updated contract clauses
- Implement outsourcing service provider or supplier due diligence via ACAN as part of onboarding and ongoing contract review processes
- Implement updated contract clauses that extend to anti-slavery measures
- Implement modern slavery training as part of the CDF Mandatory Learning Program
- Engage outsourcing service providers or suppliers to join SEDEX.

Consultation

The Archdiocese consulted with its Reporting Entities through a structured and sustained process of engagement. A Modern Slavery Working Group, comprising representatives from each entity, met regularly over a six-month period leading up to the preparation of the joint statement. This forum supported data collection, informed the development of content, and ensured each entity maintained appropriate oversight and control of its disclosures.

Across this process, all entities also engaged with the ACAN, drawing on its guidance and resources to support a consistent and informed approach to identifying and managing modern slavery risks.

This collaborative approach was complemented by entity-specific internal consultation, review and approval processes to ensure the statement reflects a coordinated, accurate and consistent approach across the group:

- The Archdiocese consulted internally with People and Culture, Legal, Risk, Property and Infrastructure, Finance, and its service provider Cushman & Wakefield;
- MACS undertook extensive consultation with its internal Modern Slavery Working Group, and departments including Procurement, Infrastructure, Legal, Communications, Risk, Compliance, People and Culture, Strategy, Company Secretary, and Finance;
- MACSEYE consulted with its parent entity MACS, as well as the Archdiocese and CDF; and
- CDF consulted with its Risk function and key departments including IT, Marketing and Client Services.

The Archdiocese and its Reporting Entities are committed to continuing this engagement throughout the year, fostering a community of practice that enables shared learning, collaboration, and continuous improvement across each entity's experience in managing modern slavery risks.

CRITERIA 7

There is no additional information to be included in the Statement.

Appendix A

Organisation charts

The Archdiocese

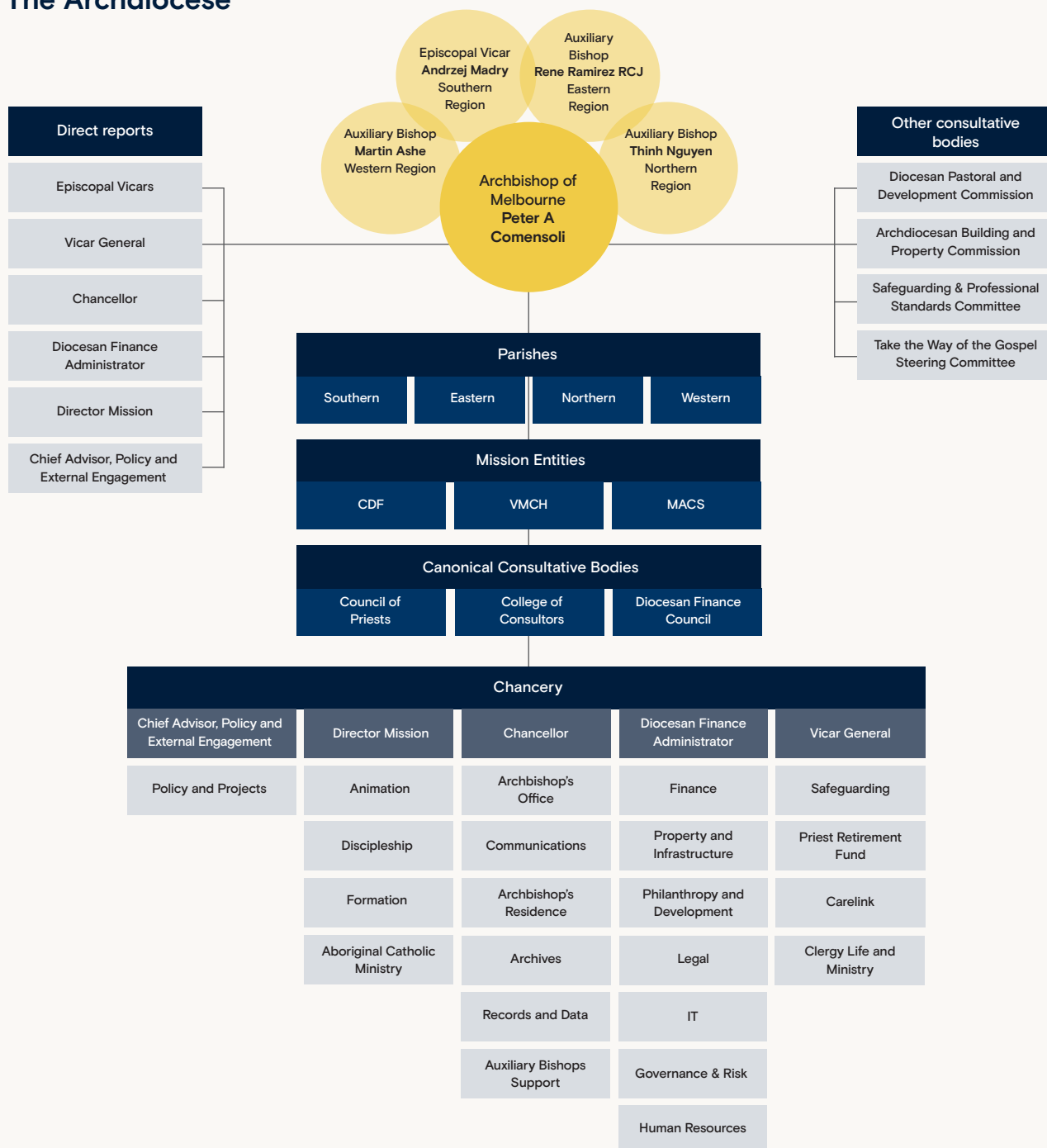
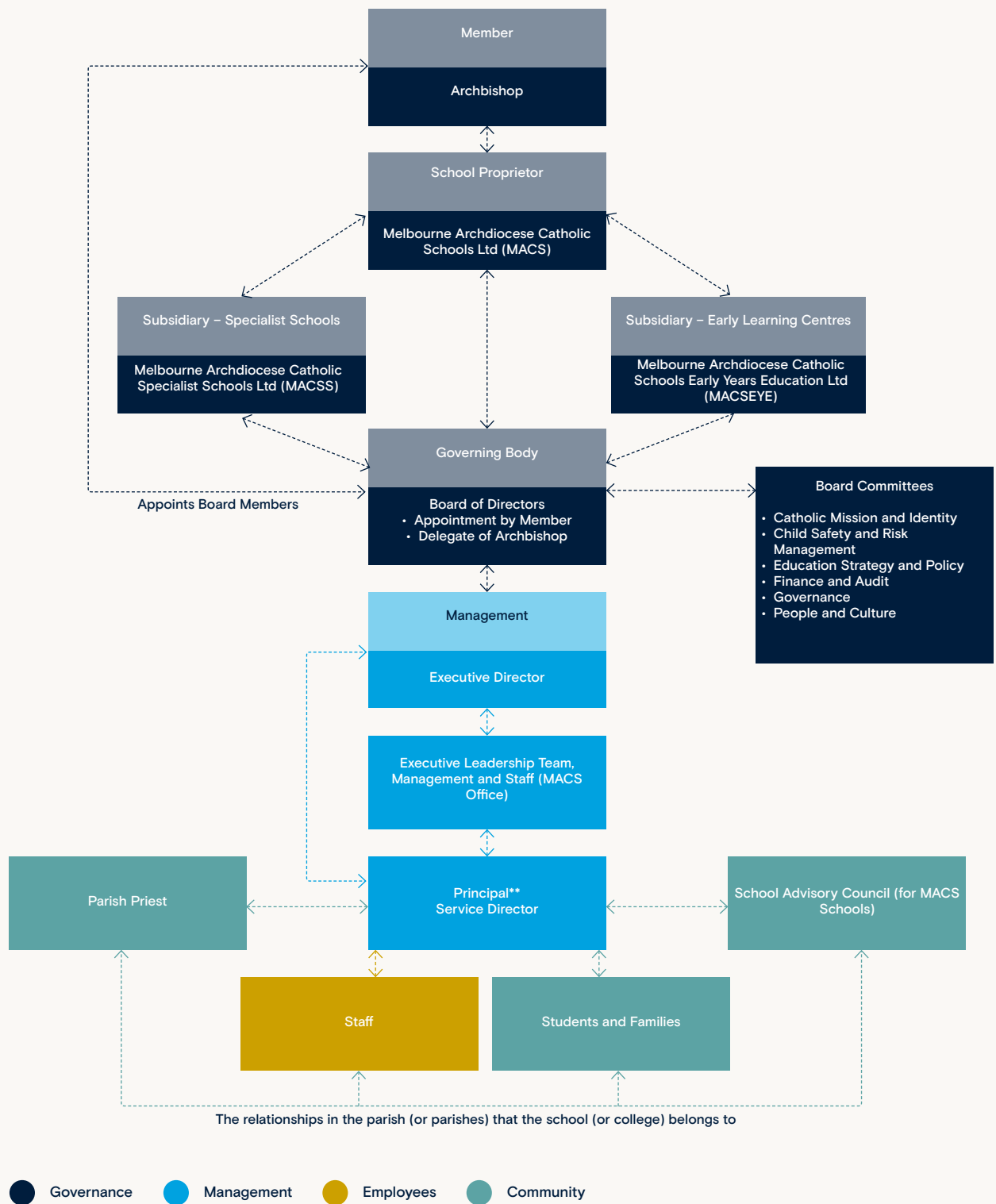


Figure 1: Organisational structure of Catholic Archdiocese of Melbourne (at 31 December 2025)

MACS



** principal executive officer (PEO) for Commonwealth Register of Institutions and Courses for Overseas Students (CRICOS), chief executive officer (CEO) for registered training organisation (RTO) and PEO for student exchange organisation (SEO)

Figure 2: Organisational structure of Melbourne Archdiocese Catholic Schools (at 31 December 2025)

MACSEYE

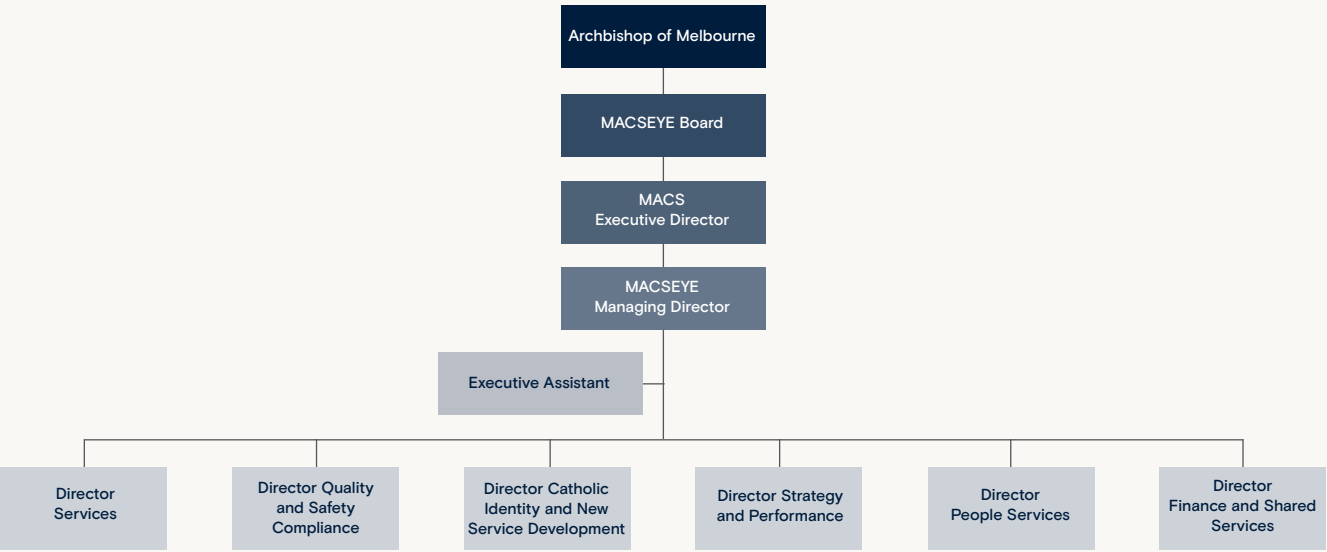


Figure 3: Organisational Structure of Melbourne Archdiocese Catholic Schools Early Years Education (31 December 2025)

CDF

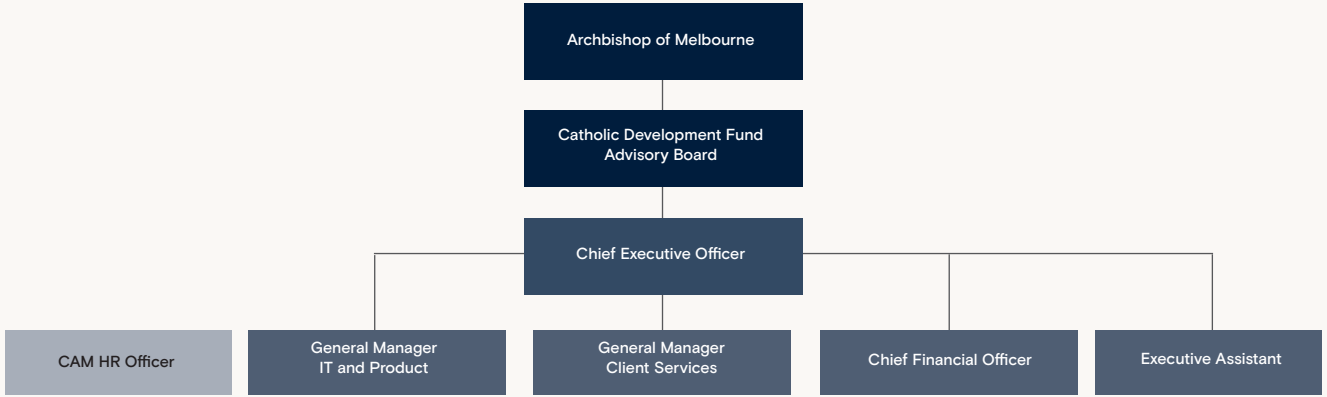


Figure 4: Organisational Structure of Catholic Development Fund (at 31 December 2025)



MODERN SLAVERY STATEMENT

2025

1 January - 31 December



ACKNOWLEDGEMENT OF COUNTRY, HEALING AND INCLUSION

We acknowledge and pay respect to the original and ongoing custodians of the land upon which we live, work, learn and teach.

We commit to actively working alongside First Nations people for healing, reconciliation and justice.

The Catholic education faith community is inclusive and acknowledges that we are all made in the image and likeness of God and we are created in love. People of all faiths, genders, sexualities, abilities and cultures are therefore respected equally in the Sandhurst Catholic community.

We acknowledge the pain and suffering of all who have been hurt in body, mind and spirit by those who have betrayed the trust placed in them.

May we all stand tall, stand firm, grounded in truth, together as one.

CHILD SAFETY

Catholic Education Sandhurst Limited (CESL) and Sandhurst Catholic Early Childhood Education and Care Limited (SCECE&C Ltd) are committed to the safety, participation and empowerment of all children.

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DISCLOSURE NOTE

This statement has been made on behalf of Catholic Education Sandhurst Limited (CESL) ABN 94 643 894 384 and Sandhurst Catholic Early Childhood Education and Care Limited (SCECE&C Ltd) ABN 98 643 978 205. This statement is prepared pursuant to Section 134 of the Modern Slavery Act 2018 (Cth) and covers CESL as a single reporting entity.

ENTITY DETAILS

Catholic Education Sandhurst Limited (CESL)

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Sandhurst Catholic Early Childhood Education and Care Limited (SCECE&C Ltd)

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MODERN SLAVERY ACT 2018 (CTH) - STATEMENT ANNEXURE

Principal Governing Body Approval

This modern slavery statement was approved by the principal governing body of Catholic Education Sandhurst Limited as defined by the *Modern Slavery Act 2018 (Cth)*¹ ("the Act") on Tuesday 19 May 2026.



Ms Pam Betts

Chair - Catholic Education Sandhurst Limited Board (CESL Board)

Signature of Responsible Member

This Modern Slavery Statement was signed by a responsible member of Catholic Education Sandhurst Limited as defined by the Act on Tuesday 19 May 2026.



Very Rev Dr Brian Boyle

Administrator of the Diocese of Sandhurst

VISION

The vision for education in Sandhurst is to provide, in partnership with our families, stimulating, enriching, liberating and nurturing learning environments in each of the Catholic school communities within Catholic Education Sandhurst Limited (CESL) and ELCs conducted by Sandhurst Catholic Early Childhood Education and Care Limited (SCECE&C Ltd). At the heart of this vision is our commitment to the ongoing duty of care that we have for the safety, wellbeing, and inclusion of all children and young people.

We believe:

-  that the Gospel is central to who we are, what we do, and how we act.
-  that we have a vital role in the mission of the Catholic Church to imagine and seek new horizons while respecting our Tradition.
-  that a strong sense of community is dependent on the quality of our collegial relationships.
-  that each person's potential is fostered through the dedicated ministry of Catholic education.
-  in leadership encompassing vision, innovation and empowerment.

MISSION

The ongoing mission of Catholic education remains the mission of the Church - "to spread the Kingdom of Christ over all the earth". Under the precepts of Canon Law (806 1), the Bishop watches over Catholic schools in the Diocese and provides general regulations for them. The Sandhurst Catholic school today responds to its mission by ensuring education is provided according to Catholic Teachings and Beliefs and by offering a particular cultural experience that is grounded in "... a Christian view of the world, of life, of culture and of history". This translates into a Christ-centred ethos and worldview that permeates all aspects of school life including relationships, structures, liturgies, celebrations and routines, as well as the formal curriculum.

Catechism of the Catholic Church, n.863 Congregation for Catholic Education. (1997),
The Catholic School on the Threshold of the Third Millenium, n.14

ABOUT US

The Sandhurst Diocese extends from Kerang in the states North West, to Corryong in the North East and includes the major regional areas of Bendigo, Echuca, Shepparton, Wangaratta and Wodonga as well as many vibrant smaller communities, providing primary and secondary education to more than 20,000 students in 58 educational settings, including primary, secondary, Foundation - Year 12 settings, Early Learning Centres and two specialist settings.

FROM THE DIOCESAN
ADMINISTRATOR CATHOLIC
DIOCESE OF SANDHURST

Very Rev Dr Brian Boyle

and

CESL BOARD CHAIR

Ms Pam Betts



The Christian tradition upholds the inherent dignity of every person. Created in the image of God, each person is endowed with unique gifts and talents, interconnected with all of creation, enriched through relationships of friendship and love, capable of profound creativity and insight, and called into communion with the Triune God as revealed through Jesus Christ. This foundational Christian understanding of the human person lies at the heart of the mission of Catholic Education Sandhurst Ltd.

While this principle finds its most immediate expression in placing students at the centre of Catholic education, it also shapes the relationships that sustain our educational communities, between Catholic schools, families, staff, parishes, and the wider community. Pope Leo has encouraged us to embrace this community in the broadest sense, recognising that our actions can have far-reaching impacts beyond our local context.

Modern slavery remains a significant global challenge and can affect organisational operations, business relationships, and supply chains in complex and often hidden ways. Practices such as human trafficking, child labour, and the exploitation of workers through coercion or unfair wages represent grave violations of human dignity and stand in direct opposition to the values we seek to uphold. Catholic Education Sandhurst Ltd and Sandhurst Catholic Early Childhood Education and Care Ltd are committed to ensuring that we do not contribute to such practices and to supporting efforts to eliminate them wherever possible.

This is the fifth Modern Slavery Statement issued by Catholic Education Sandhurst Ltd since the establishment of its current corporate structure. Over the past year, the organisation has continued to strengthen its understanding of modern slavery risks and to embed greater awareness across its operations. Progress has been made in identifying areas where the organisation may be exposed to modern slavery risks and in taking practical steps to assess and mitigate those risks.

In 2026, Catholic Education Sandhurst Ltd will continue to focus on strengthening communication, training, and awareness across its schools, early childhood services, and offices. These efforts aim to support staff and students to better understand modern slavery risks, recognise potential indicators, and respond in ways that uphold human dignity. Through these initiatives, we seek to foster a culture of vigilance, responsibility, and ethical decision-making that reflects our Catholic identity and commitment to justice. We remain confident that, through continued learning, collaboration, and action, Catholic education within the Diocese of Sandhurst can play a meaningful role in promoting the dignity, freedom, and wellbeing of every person.

Brian Boyle

Very Rev Dr Brian Boyle
Administrator of the Diocese of Sandhurst

Pam Betts

Ms Pam Betts
CESL Board Chair

REPORTING CRITERION 2



Catholic Education Sandhurst Limited (CESL) - Governance Framework

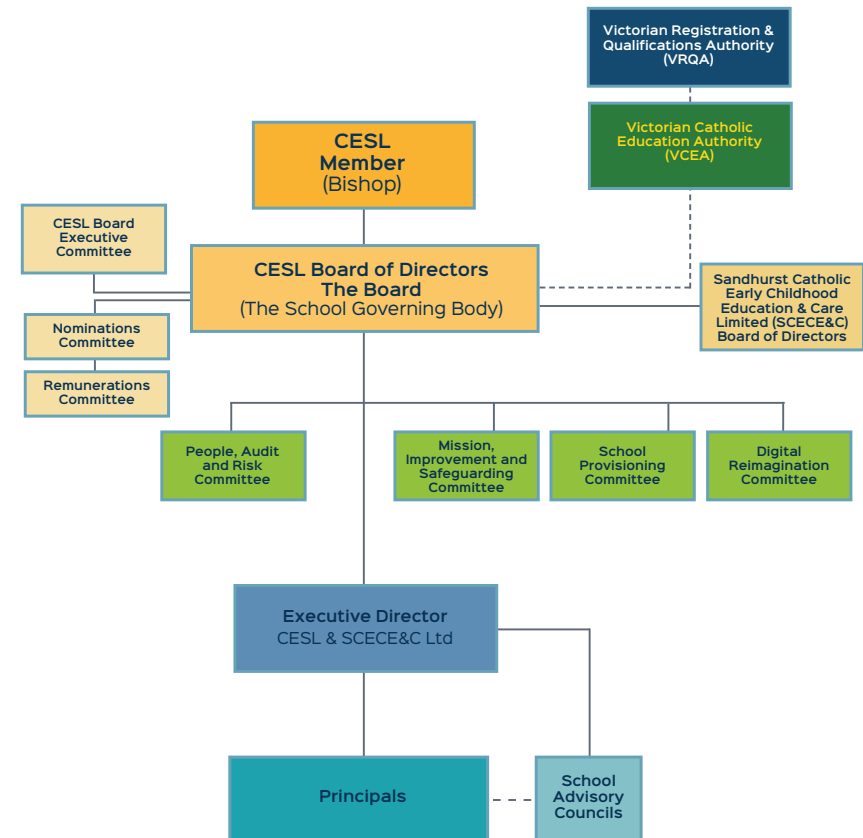
The CESL Board of Directors (the Board) has the responsibility to ensure the advancement of education through the operation of an effective system of Catholic education at all levels within the Diocese, always in accordance with the beliefs, traditions, practices and canonical decrees of the Church and Church Laws. The Catholic education provision of CESL spans primary schools, secondary schools, and specialist settings. It is the responsibility of the Board to ensure that each school operated by the Company is fully compliant with all legal obligations and standards required of registered schools in Victoria.

The Board is responsible for setting strategic direction and policies to achieve the above. It contributes legal, financial, and other professional expertise to the governance of the Company and is supported by an expert Board committee membership. The Board works to promote stability, confidence, mutual respect, and support in the relationships between all who exercise leadership and management. The Board must ensure CESL schools comply with the minimum standards for school registration under Schedule 4 of the Education and Training Reform Regulations 2017 (Vic) (ETR Regulations).

It is the role of the Board to make explicit the importance of system improvement, facilitate the achievement of high-quality personal learning outcomes for all students and the provision of educational environments in which all will continue to flourish.

In so doing the Board ensures that all legal obligations and compliance responsibilities arising from being a Company are met, particularly the:

- Key aspects of the Board's legal obligations under the Corporations Act (i.e. Board of Director responsibilities).
- Governance standards imposed by Division 45 of the Australian Charities and Not-for-profits Commission Act 2012 (Cth) (ACNC Act).



REPORTING CRITERION 2



- Minimum standards for school registration under Schedule 4 of the ETR Regulations, including all matters relating to Governance; Enrolment; Curriculum and Student Learning; Student welfare; Staff employment and School infrastructure.
- Ministerial Order 1359 – Child Safe Standards - Managing the risk of child abuse in schools, the Board, as the school governing authority, is responsible for ensuring Sandhurst Catholic Schools embed a culture of child safety and operate in compliance of child safety requirements. These include, but are not limited to, ensuring the Company has suitable policies, which are enforced, and provide for child safety and strategies to reduce the risk of child abuse. All such policies are approved and mandated by the Board.

The Executive Director has delegated responsibility to report to the Board on the implementation of the policies:

- Reviewing and ensuring the reliability and effectiveness of CESL's compliance and risk management systems covering all areas of operation from occupational, health and safety to privacy.
- Finance and audit management.
- Capital development.

For the purposes of school regulation, the Board is structured in a way to enable:

- Effective development of strategic direction of Sandhurst Catholic schools.
- Effective management of the finances of Sandhurst Catholic schools; and
- Fulfil its legal obligations in respect of each Sandhurst Catholic school.

People, Audit and Risk Committee (PA&R Committee)

Supporting the responsibilities of CESL and SCECE&C Ltd Boards are their respective PA&R Committees. The Committee's Terms of Reference state that they are to provide strategic advice and high-level thinking on matters pertaining to child safety, auditing, risk mitigation, financial and investment management, OH&S and modern slavery, ensuring quality reporting and compliance with statutory and regulatory requirements.

REPORTING CRITERION 2

Sandhurst Catholic Early Childhood Education and Care Limited (SCECE&C Ltd)

SCECE&C Ltd is an approved Provider with the Australian Children's Education and Care Quality Authority (ACECQA) for the early learning centres at St Mel's Kindergarten Shepparton, Assisi Kindergarten Strathfieldsaye, MacKillop Early Learning Centre Nagambie and most recently, in 2025 a further three centres were opened in Wodonga, Echuca and Bendigo. SCECE&C Ltd is a company limited-by-guarantee and registered with the Australian Charities-and-not-for-profit Commission. As a wholly owned subsidiary of CESL, SCECE&C Ltd operates through an independent representative and expert Board of Directors and works in close collaboration and partnership with local Catholic and Government schools, parish communities and Diocesan agencies, to help ensure a continuity of growth and development for each child and their family.



REPORTING CRITERION 2



Educational and Office Services

Key Objective of CESL

“To foster the academic achievement and spiritual formation of each student, in an environment and culture that is committed to pastoral care and wellbeing, including appropriate safeguarding strategies and policies. Such an education builds up independent, confident and creative learners who have a love of learning, a sense of curiosity, and respect for themselves and for others, including the poor and marginalised.”

Bishop Shane Mackinlay: CES Ltd Initial Directions 2020

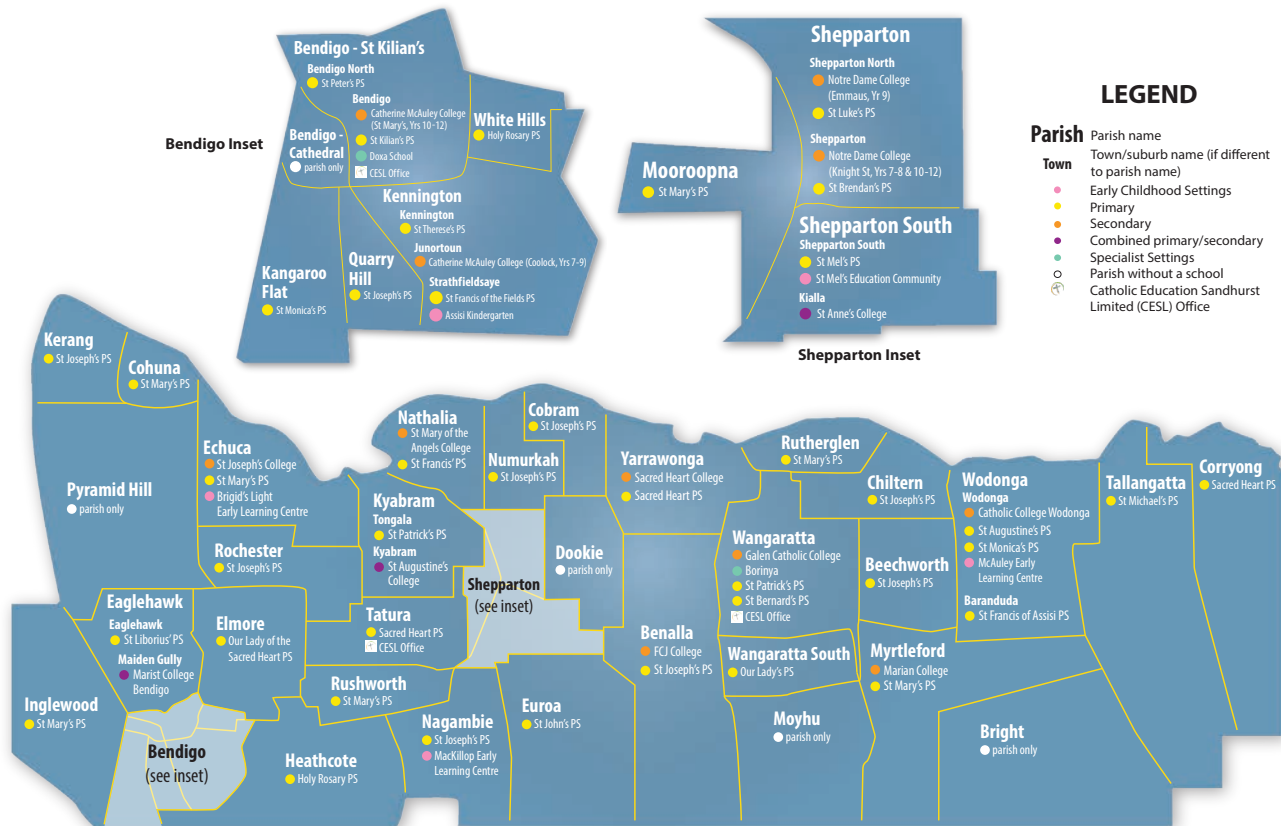
For 172 years, Catholic schools have been an integral part of the Diocese of Sandhurst, with the first school opening on the Bendigo Goldfields in 1853. Since then, the network of schools has made a unique contribution to the life, faith practice, spirit and culture of parishes throughout this region. Sandhurst Catholic schools are proud to be part of the long tradition of Catholic education in Australia, providing countless young people with enriching experiences and skills they acquired in Catholic learning environments.

Today, CESL oversees and operates fifty-one Catholic schools, offering Primary, Secondary, Specialist Settings and Early Childhood Centres to cater for the diverse needs of the community. We take pride in our responsibility to provide high-quality education that upholds our values and traditions. Additionally, CESL will continue to operate future schools established by the Company known as Sandhurst Catholic Schools, further expanding our contribution to the education landscape of the region.

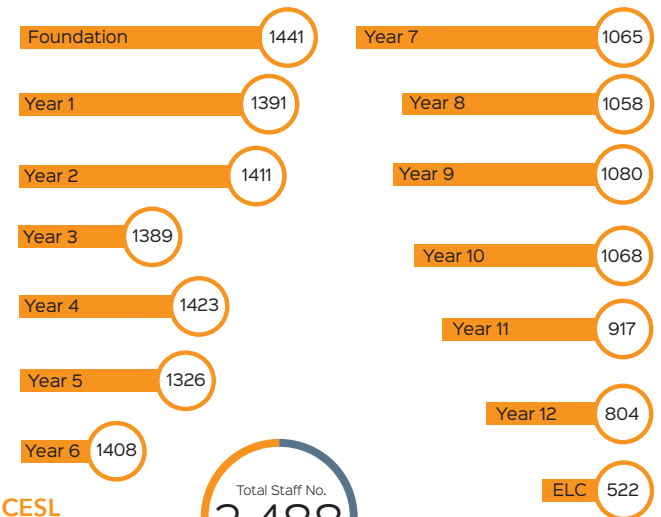
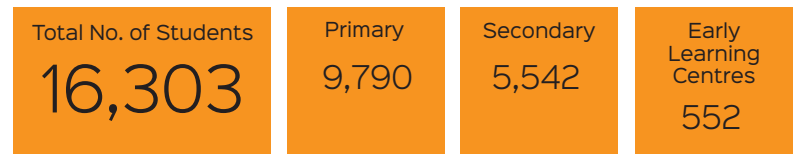
REPORTING CRITERION 2



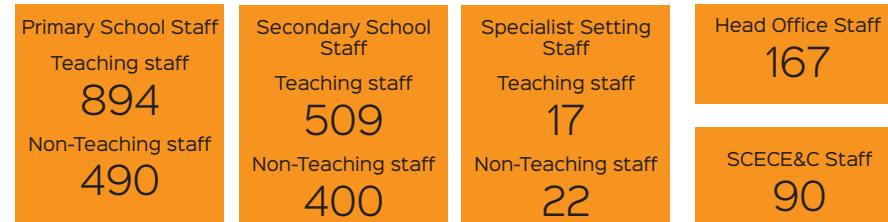
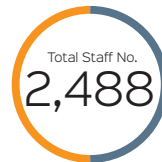
Workforce Profile



CESL Student Population



CESL Staff Population



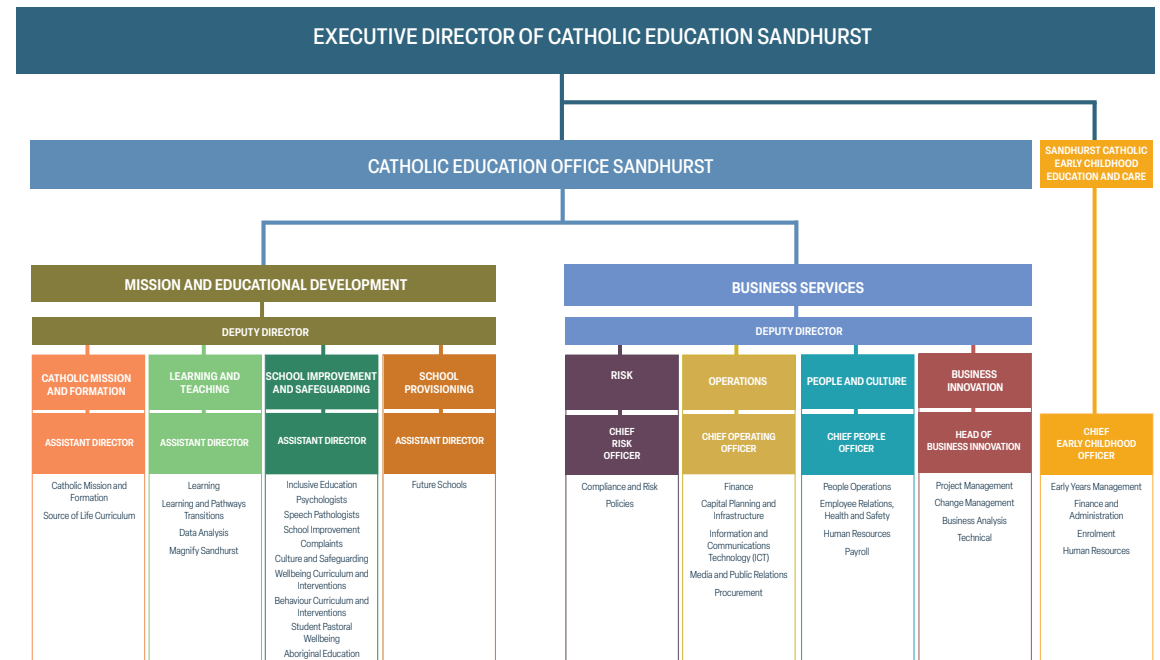
REPORTING CRITERION 2



The CESL Central Team Structure

The CESL Central Team provides support for the management of all CESL schools as well as SCECE&C Ltd. The CESL Executive Director, together with the CESL Executive Leadership Team, is responsible for providing leadership and direction across all areas of the company's operations. This includes ensuring compliance with regulations and standards, as well as driving the continuous improvement of both CESL schools and the CESL Head Office. Their goal is to foster a culture of excellence and innovation while upholding the values of the Catholic education community.

The two entities collectively employ a team of 167 staff members located across four regional locations: two in Bendigo, Tatura, and Wangaratta. The CESL Central Team is deeply committed to fostering a collaborative partnership with each school and parish community, as well as the broader Catholic education community of Victoria. They are dedicated to working in a spirit of co-responsibility to shape the culture, improve performance, and enhance the capacity of both the schools and the Catholic Education Office.



REPORTING CRITERION 2



Operations and Supply Chains

As an educational institution our largest expenditure is the salaries of teachers, educators and support staff whose salaries and employment-related costs represents the majority of the organisation's annual expenditure. In 2025 CESL had a total turnover of \$386 million which includes all consolidated entities.

The total workforce profile of CESL includes 2,488 direct employees, while the total number of goods and services, contractors and suppliers, is just over 7,000.

Schools are supported through CESL in providing support services to schools which include:

- Office of the Executive Director
- Catholic Mission and Formation
- Learning and Teaching
- School Improvement and Safeguarding
- School Provisioning
- People and Culture
- Operations
- Risk
- Business Innovation

*“Every person ought to have the awareness that purchasing is always a moral
- and not simply an economic - act”*

Pope Francis (2014)

REPORTING CRITERION 2



CESL has developed the following procurement values to guide decision making.



Responsibility – In our mission as a Catholic faith community, we are committed to seeking ethical, sustainable, and socially responsible procurement as we strive to make a positive impact on the global climate and environment, support First Nations communities and abolish Modern Slavery throughout our supply chain.

Integrity - CESL and Service Providers will observe the highest standards of ethics and integrity in undertaking procurement activities. All purchasing activities will comply with relevant legislation, regulations and CESL policies. Service Providers will be treated fairly, respectfully and free from bias.

Clarity – We will drive transparency and accountability to support open, success-driven and respectful partnerships with our Service Providers. We strive for success with our partnerships because when our Service Providers succeed, CESL and our school communities will thrive!

Community – CESL greatly values and promotes the viability of our local rural and regional communities and is committed to supporting and fostering the prosperity of businesses within the Sandhurst diocese. In alignment with Catholic Social Teaching, CESL also adopts social procurement practices that actively promote accessibility and inclusion across our supply chain, seeking to create positive influence and opportunity, with particular attention towards First Nations peoples, Victorians with disabilities, and other marginalised groups.

Balance - CESL determines “the Best Value” for goods and services to balance cost, service, quality, reliability, innovation, ethics, sustainability and value alignment.

REPORTING CRITERION 3



Risk Assessment

For Catholic entities, modern slavery risks are defined by the ACAN Category Risk Taxonomy, a classification standard that identifies severity of actual or potential harm to people (saliency) in spend categories.

The ACAN Category Risk Taxonomy is based on sources such as:

- the Global Slavery Index
- the International Labor Organisation (ILO), including definitions of modern slavery
- the Bureau of International Labor Affairs (ILAB), U.S Department of Labor
- the Global Child Forum and UNICEF.

Four key factors are also used to determine the level of risk:

- Geography: the country or location where a good is made or service is delivered
- Industry: the sector in which the making of goods or delivery of service occurred
- Commodity: the raw materials or components that comprise the goods or products
- Workforce vulnerability: such as bonded visas, temporary migrants, women or children known to be employed in specific industry sectors
- Domus 8.7: trends, cases, and risk intelligence identified through the Domus 8.7 remediation service, including grievances and remediation insights relevant to category and risk to workers.

REPORTING CRITERION 3

Classification

High Risk	Medium Risk	Low Risk
• Building and construction • Cleaning and security • Events and events management • Facility management and property maintenance • Finance and investment • Food and catering services • Furniture and office supplies • ICT hardware • ICT software and network services - offshore • Labour hire • Linen, laundry and textile products • Medical devices and supplies • Transport, logistic and warehouses • Uniforms and PPE • Waste management services	• Advertising and marketing • ICT software and network services - onshore • Utilities • Fleet management, consumables and maintenance • Travel and accommodation • Print/mail provider	• Professional services • Financial expenses • Government and agency fees • Licence/membership fees

NOTE: the following categories are Not in Scope of the ACAN Category Risk Taxonomy:

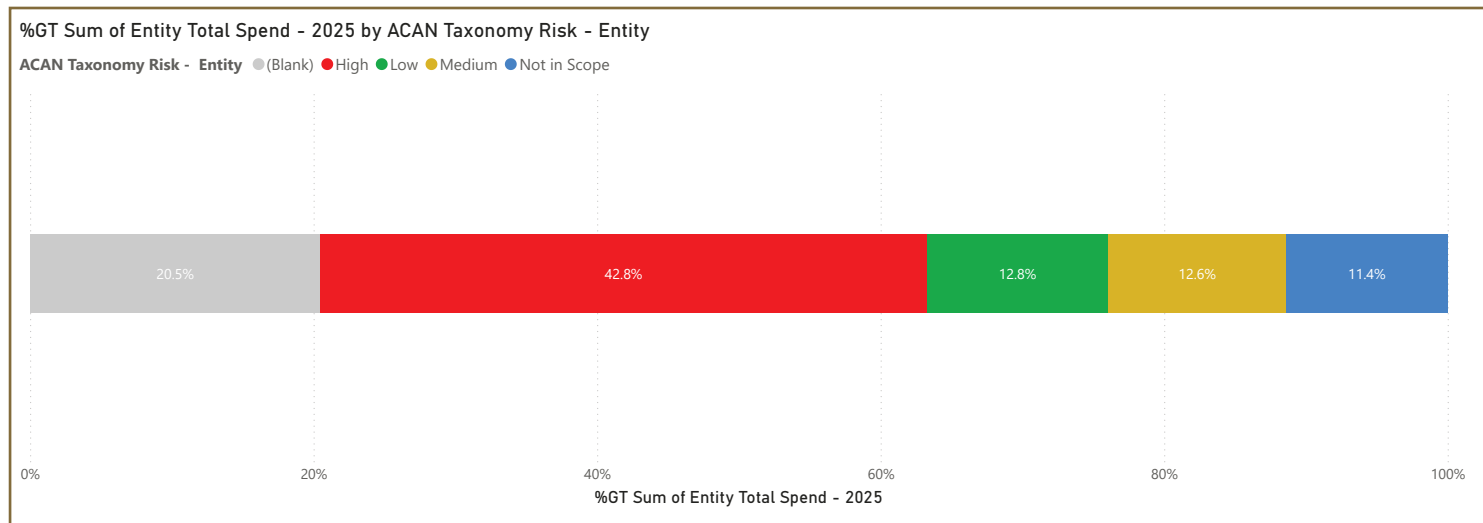
- Pastoral
- Payroll (excluding labour-hire and sub-contracting)

REPORTING CRITERION 3

Spend Data Analysis

CESL High Risk Spend Categories

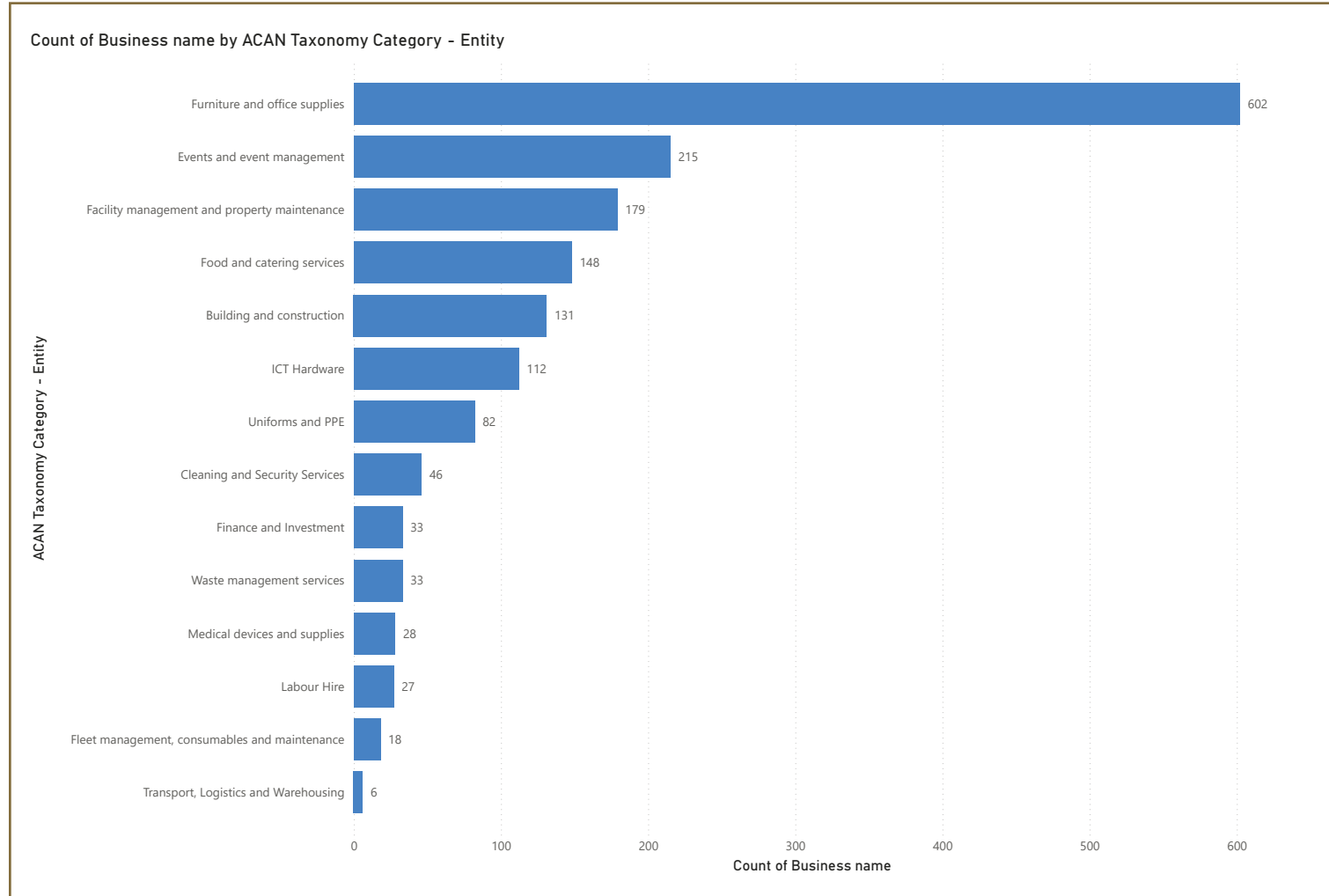
- CESL High Risk Spend for the calendar year 2025 was \$38m from a total of 1,660 suppliers. The split between high and low risk for spend was 43% and 13% respectively.
- Building & Construction related spending (\$15m) presents the greatest spend risk for CESL at 41% of total high risk spend, although the lower number of suppliers (131) helps mitigate this risk.
- The Furniture and Office Supplies category accounts for the highest number of high-risk suppliers (602) and the third highest spend (\$5m). These two spending categories account for 55% of CESL high risk spend.



REPORTING CRITERION 3



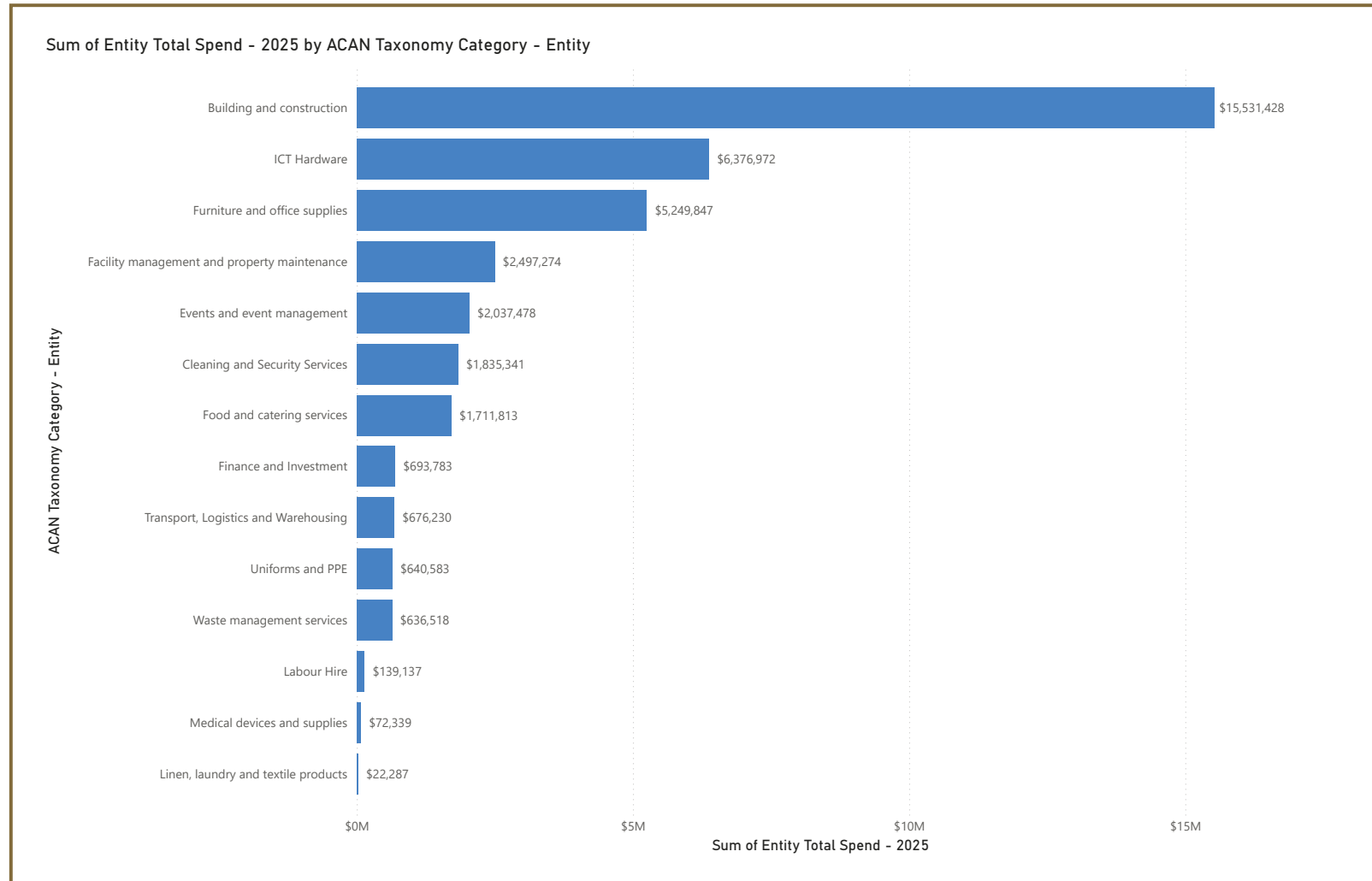
Count of Business name by ACAN Taxonomy Category - Entity



REPORTING CRITERION 3



Sum of Entity total Spend - 2025 by ACAN Taxonomy Category - Entity



REPORTING CRITERION 4



CESL Modern Slavery achievements in 2025

- Internal audit of procurement services by a consultancy firm
- Procurement Strategy commenced in late 2025, for completion in early 2026 that will set a future procurement roadmap and framework
- Developed a Modern Slavery Action Plan, promoting awareness among current and potential suppliers on the CESL website.
- CESL achieved a significant improvement in its ACAN maturity assessment score, increasing from 44% in 2024 to 71% in 2025. This improvement reflects strong progress and increasing organisational maturity in modern slavery risk management.
- Continued to incorporate Modern Slavery clauses into supplier contract templates to hold suppliers accountable.
- Utilised Vendor Panel for tender processes, aiding in supplier selection and ensuring compliance with Modern Slavery requirements.
- A significant reduction in the total number of suppliers from 10,000 to 7,000.
- Attended ACAN and Sedex webinars.
- Continued the development of a robust Modern Slavery Working Group to strengthen cross-departmental efforts.
- Launched Modern Slavery introductory training with CESL staff, schools and Board members, with 336 participants successfully completing the module.

REPORTING CRITERION 4



ACAN Supplier Engagement

The ACAN Program provides supplier engagement support and data, enabling a systematic and comprehensive supply chain risk assessment. In 2025 the ACAN Modern Slavery Risk Management Program launched a new purpose-built data management platform - ROTA. ROTA centralises the ACAN Risk Management Program framework and facilitates supplier performance evaluation and engagement.

1. Evaluation of the modern slavery risk within operations and supply chains, using the ACAN Risk Taxonomy
2. ACAN Supplier Survey to identify supplier revenue, number of employees, countries of origin for goods sourced overseas, workforce contractual arrangements and Sedex membership status.
3. Supplier education on modern slavery and risk management in key areas: cleaning, building and construction, procurement of labour, labour hire and services, sourcing goods from overseas, grievance mechanisms and remediation
4. Onboarding suppliers to Sedex requires a business address, contact details and goods or services provided
5. Sedex Self-Assessment Questionnaire (SAQ) helps suppliers to evaluate their practices against established standards and identify areas for improvement
6. Desktop review to identify key actions required from suppliers
7. Enhance supplier screening using Know Your Client (KYC) intelligence software
8. Corporate Social Compliance Audits provide a point in time, objective and independent verification process of supplier alignment with local laws and worker wellbeing standards
9. Domus 8.7 Index modern slavery statement assessment on selected suppliers in high-risk categories
10. ACAN Prequalified Supplier Directory - a list of preferred suppliers accessible to Catholic organisations

REPORTING CRITERION 4



Domus 8.7

Catholic Education Sandhurst is a founding member of Domus 8.7. Domus 8.7 was established as an agency of the Catholic Archdiocese of Sydney in 2020 as a key element of the ACAN Modern Slavery Risk Management Program. This collaborative approach to remediation is aligned with the Modern Slavery Act and Catholic Social Teaching which are centered on the needs, wellbeing and empowerment of people impacted.

Domus 8.7 provides Catholic Education Sandhurst:

- resources that enable us to listen to workers (grievance channel)
- a 24/7 careline for workers on our sites, staffed by professional counselors
- direct support to people impacted by modern slavery
- guidance and technical assistance to prevent, identify and remediate modern slavery
- a documented process to assess if an organisation has caused, contributed or is directly linked to modern slavery and modern slavery indicators.

Domus 8.7 empowers people impacted by modern slavery to have choice and control over what forms of remediation are meaningful to them and to engage safely with business/supply chain actors. Supports may include:

- modern slavery indicator assessment
- needs assessment, case coordination, response and remediation planning
- referrals to community, social services, unions
- transport, accommodation, financial and food support
- legal support, referrals, accompaniment and advocacy
- job training, retraining and redeployment
- accompaniment and advocacy to engage with government and law enforcement agencies
- opportunities to contribute lived expertise to improve modern slavery responses.

REPORTING CRITERION 5



Continuous Improvement

Collaboration is at the heart of accelerating progress. This also includes opportunities to comparatively measure social, environmental and governance (business ethics) risks and actions with peers in our network.

In its foundational stages, Catholic Education Sandhurst used an internally devised ACAN framework to measure progress. This bespoke approach reflected the unique priorities, constraints, and practices across Catholic organisations.

In 2025, the ACAN Program adopted a globally recognised risk measurement system through SEDEX. This aligns reporting entities with a methodology that combines global data about risks in different countries and industries with site-specific information from the SEDEX platform. SEDEX regularly updates the methodology to ensure it is aligned with new and emerging risks. Therefore, completion of the SEDEX SAQ completed by Catholic Education Sandhurst is a substantial measure of continuous improvement year on year. Below is an explanation of how scoring is calculated using the SEDEX SAQ and Catholic Education Sandhurst's 2025 risk scores and management controls that will serve as our benchmark for continuous improvement.

Explanation of Scoring

Combined Risk Score 3.9/10 (Low Risk)

Calculated from inherent risk and site characteristics, adjusted for management controls and audit results. The score is broken down by pillar and highlights strengths and opportunities to focus our efforts on key areas that drive ethical and sustainable practices.

Inherent Risk Score 3/10 (Low Risk)

Predicts potential risks based on a country/region, and sector. Spanning all four pillars, this score is broken down by topics. It can be used as a baseline to identify and prioritise areas for improvement in operations. This score shows the natural risks of doing business in a specific country or sector. It does not include any details about individual sites.

Labour Standards Pillar - assesses location and industry factors that could increase labour risks, such as vulnerable worker populations or high rates of workplace violations.

Health and Safety Pillar - considers regional and industry-specific health and safety risks, including local regulations and industry accident rates.

REPORTING CRITERION 5



Business Ethics Pillar - assesses industry and location risks related to unethical practices, such as high corruption levels or weak regulatory oversight.

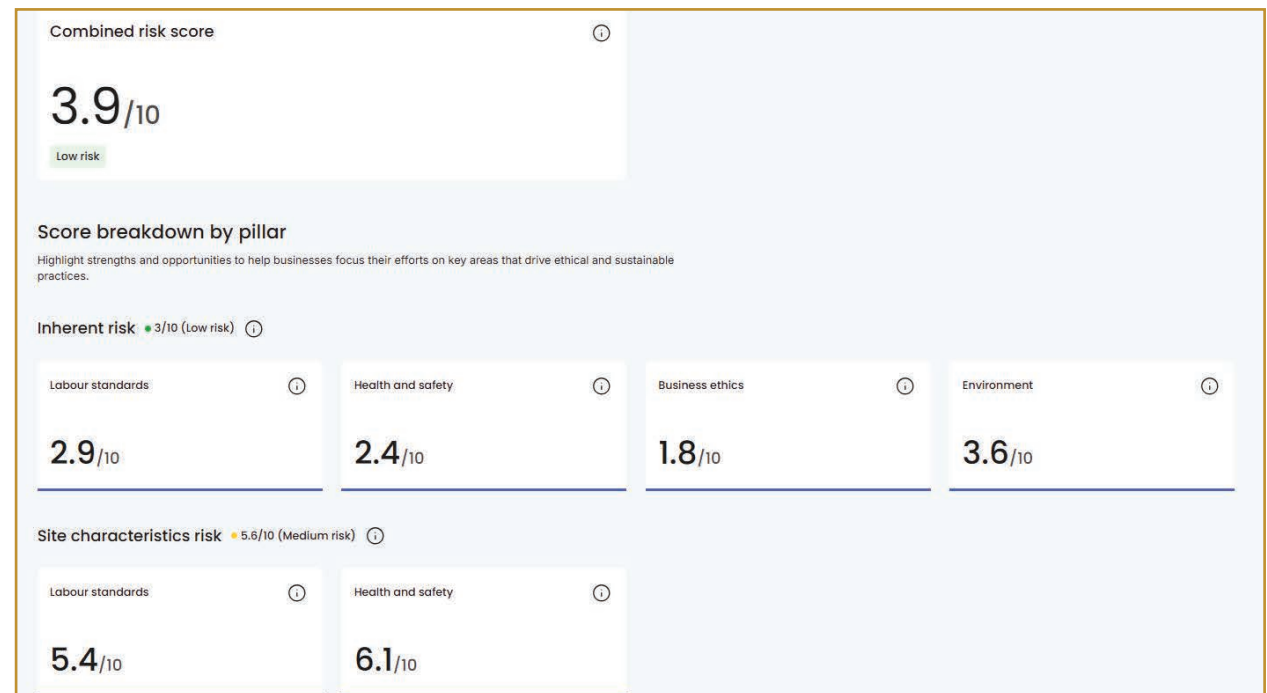
Environment Pillar - examines the environmental impact of the site's industry and location, such as pollution levels or resource use that may create regulatory or compliance risks.

Site Characteristics Risk Score 5.6/10 (Medium Risk)

Highlights potential risks based on your suppliers' SAQ responses in the Labour Standards and Health and Safety pillars. This score can be used to assess and support the implementation of policies and processes that mitigate workplace risks within your supply chain. For the Environment SAQ, site characteristics consider the type of work, business and location (e.g. proximity to sensitive areas). For the Core SAQs, risks are assessed based on the nature of the work, such as exposure to heavy machinery or hazardous materials.

Labour standards - reflects labour-related risks like employment practices, workers rights and wages based on SAQ responses. High-risk activities in this area can raise the score.

Health and Safety - based on SAQ responses to questions about site-specific health and safety factors, such as equipment usage, handling of chemicals or accident risks.



REPORTING CRITERION 5

Management Controls Score 3.2/5 (Good)

This score measures how well policies or processes are in place to reduce the risks from the site characteristics. It is also based on answers in the SAQ. A Poor score of 0-0.9 indicates that there are few or no controls in place. An Advanced score of 4-5 indicates that there are exemplary controls that exceed compliance and drive innovation.

Labour standards - evaluates policies and processes to ensure fair labour standards and worker protections are effectively managed.

Health and Safety - reviews the adequacy of safety protocols, emergency preparedness and training efforts to manage health and safety risks on site.

Business Ethics - evaluates controls against unethical practices such as anti-bribery policies, compliance with legal standards and transparent operations.

Environment - looks at policies managing environmental impact, resource efficiency and waste reduction practices to align with sustainability standards.

Management controls 3.2/5 (Good)				
Measures suppliers' risk management (0-5, with 5 as best) to assess effectiveness and target improvements.				
View SAQ				
Labour standards		Health and safety		Business ethics
3.1/5		3.2/5		4.5/5
Good		Good		Advanced
				Environment
				-/5
Section title	Points available	Points achieved	% of points achieved	Score
Profile	1	1	100%	5.0 (Advanced)
Management systems	27	14	51.9%	2.6 (Moderate)
Freely chosen employment	6	4	66.7%	3.4 (Good)
Freedom of association	7	4	57.1%	2.9 (Moderate)
Health and safety	58	37	63.8%	3.2 (Good)
Working hours	6	6	100%	5.0 (Advanced)
Discrimination	41	16	43.9%	2.2 (Moderate)
Discipline and grievance	34	28	82.4%	4.1 (Advanced)
Communities and human rights	12	7	58.3%	2.9 (Moderate)
Business ethics	10	9	90%	4.5 (Advanced)

REPORTING CRITERION 5



Our plans for 2026

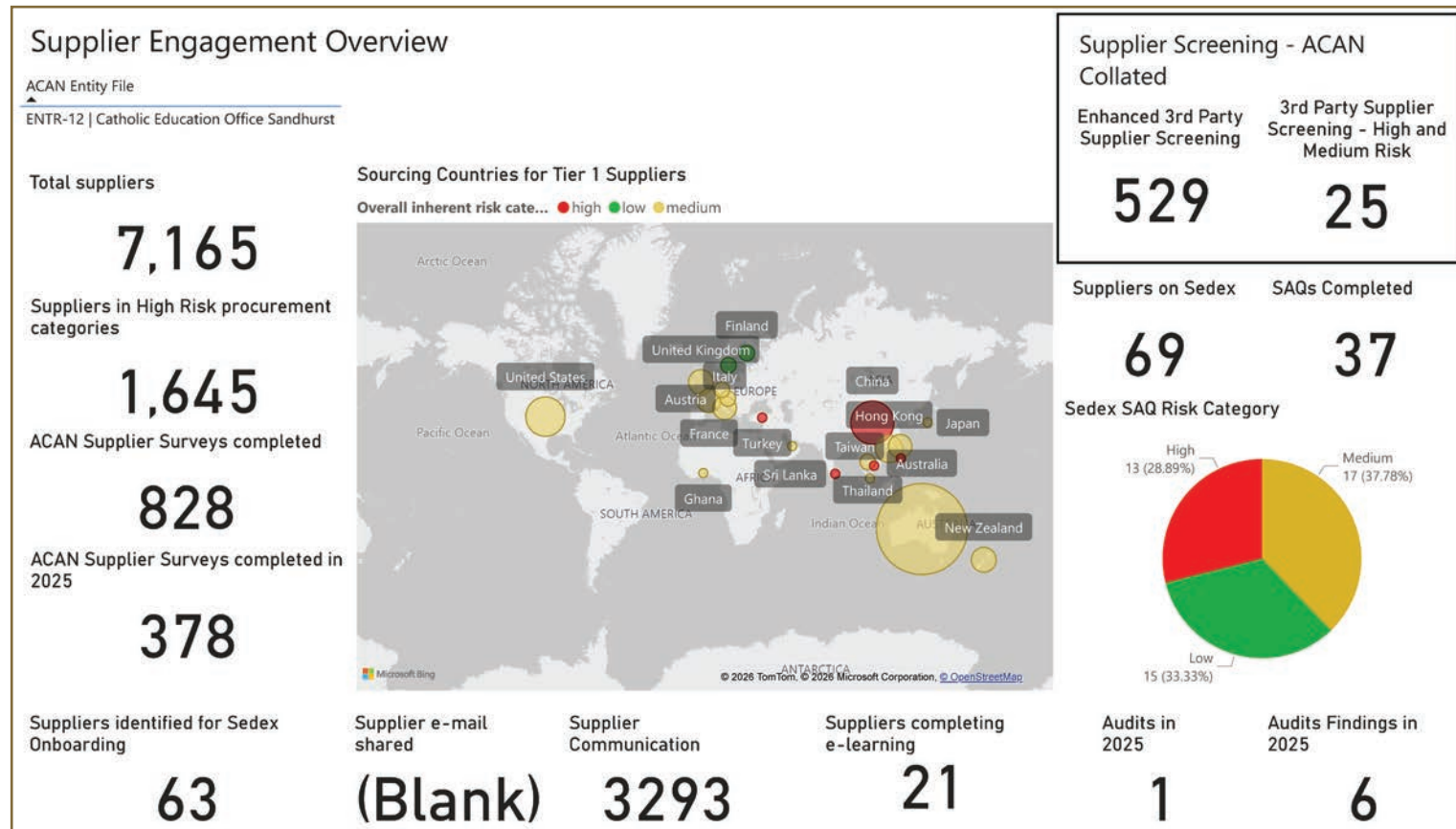
To strengthen our mitigation practices going forward the following initiatives are in development for 2025:

- Continue implementing the Modern Slavery Communication Action Plan.
- Conduct quarterly awareness campaigns to enhance understanding of Modern Slavery risks within the organisation and Sandhurst schools.
- A modern slavery training program for both CESLO staff and all 51 schools.
- Implement the findings from the Procurement strategy to enhance our maturity and capability.
- Implement a due diligence program for key suppliers.
- Invite and increase the number of suppliers to Sedex (20%) to complete the comprehensive self-assessment questionnaire (SAQ).
- Commence project on supply chain 'Category Mapping'.
- Commence a review into CESL suppliers and look to decrease and consolidate.
- Leverage the Sedex (ACAN program) platform to identify and assess risks associated with suppliers that may have red flags related to modern slavery practices.
- Maintain our relationship with ACAN, seeking guidance and support through their webinars and compliance programs.
- CESL's aspirational goal is to identify and eliminate all risks related to Modern Slavery within our operations, business partnerships and supply chain.
- Regular meetings and check-ins with CESL preferred suppliers.
- A contact system for escalation protocol and remedy pathways policy and framework review.

REPORTING CRITERION 5



Supplier Engagement Overview



REPORTING CRITERION 5



ACAN baseline data

The ACAN baseline data table provides a comparative measure of supplier engagement and program activities to measure progress and inform future action planning

Catholic Education Sandhurst	Activity	2025	2024
Internal / Staff	Hours spent on modern slavery activities	200	45
	Individual staff completed e-learning	336	99
	E-learning modules completed	3	3
External / Supplier Engagement	Total number of suppliers	7165	9874
	Number of suppliers with visible contact information and ABN		0
	Number of suppliers across high-risk categories	1645	1764
	Number of ACAN Supplier Surveys completed	828	841
	Supplier staff attending capacity building webinars	21	20
	Invited to join Sedex	63	44
	Joined Sedex	69	62
	Sedex SAQ completed	37	44
	Social audits	1	17
	Corrective actions	8	75
	Contacts made via worker voice / grievance mechanism	0	0
DOMUS 8.7 External Referrals	Referrals for advice and assistance	0	0
	Individuals identified or referred for modern slavery assessment	0	0
	Individuals with modern slavery cases remediated	0	0

REPORTING CRITERION 6



Consultation with Entities Owned or Controlled

This statement is provided as a single reporting entity in accordance with section 13 of the Modern Slavery Act 2018 (Cth). It covers the activities and operations of the **51 Sandhurst diocesan schools** and includes the subsidiary entity **SCECE&C Ltd**, which operates **6 early learning centres**.

In preparing this statement, the CESL Chief Operating Officer consulted with relevant functional departments across CESL and SCECE&C Ltd, as well as the Australian Catholic Anti-Slavery Network (ACAN) and other participating members of the ACAN network.

This consultation has informed CESL's approach to modern slavery risk management, ensuring the statement is appropriately tailored to reflect the organisation's structure, operations, and risk profile. Engagement with ACAN and internal stakeholders will continue to be an ongoing process to support future initiatives, activities, and modern slavery statements.









DIOCESE
OF
BALLARAT
CATHOLIC
EDUCATION
LIMITED



CATHOLIC EDUCATION BALLARAT

Diocese of Ballarat Catholic Education Limited
(DOBCEL)

2025 Modern Slavery Statement

1 January 2025 to
31 December 2025

Disclosure Note



This statement has been made on behalf of the Member and Directors of DIOCESE OF BALLARAT CATHOLIC EDUCATION LIMITED ABN 68 894 686. This Statement is prepared pursuant to section 134 of the Modern Slavery Act 2018 (Cth) and covers all entities owned or controlled by the DIOCESE OF BALLARAT CATHOLIC EDUCATION LIMITED (DOBCEL).

This is DOBCEL's sixth Modern Slavery Statement and sets out the progress that DOBCEL has made towards identifying, assessing, and addressing modern slavery risks during the 2025 Calendar Year Reporting Period, from 1 January 2025 to 31 December 2025.

Entity Details

DIOCESE OF BALLARAT CATHOLIC EDUCATION LIMITED (DOBCEL)

ACN: 629 894 686

ABN: 68 629 895 686

 Address: 200 Gillies St North, Lake Wendouree VIC 3350

 Phone: 03 4344 4350

 Email: execdirector@dobcel.catholic.edu.au

 Website: www.dobcel.catholic.edu.au



MODERN SLAVERY LIAISON OFFICER:

Name: Sarah Page

Role: Social Justice Education Officer

Team: Catholic Identity & Mission Team

 Email: spage@dobcel.catholic.edu.au



Acknowledgement of Country

DOBCEL acknowledges respectfully the Traditional Custodians of the lands on which we live and work. We pay our respects to their Elders, past and present, and extend that respect to all Aboriginal and Torres Strait Islander peoples on this land.

As we strive for ecological conversion in this Jubilee year, we recognise their ongoing custodianship and wisdom in caring for Country over thousands of years. We honour their Elders, past and present, and commit ourselves to working alongside them in solidarity to protect our common home for future generations.

Child Safety

The Diocese of Ballarat Catholic Education Limited (DOBCEL) is committed to the safety, participation and empowerment of all children.

Founded in Christ and sustained by faith, Catholic schools seek to fulfil their mission of enabling each student to come into the fullness of their own humanity. This includes paying attention to the inherent dignity of children and young people, and their fundamental right to be respected, nurtured, and safeguarded by all.



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A Prophetic Call to Peace

"We must ask ourselves how we can nourish that hope for the millions of people who are trapped in modern slavery... Together we can make a great effort and create the conditions for trafficking and exploitation to be banned."

— Pope Francis, [2025 World Day of Prayer Message](#)

These words stand as part of the late Holy Father's final, urgent appeals to the global Church to fiercely oppose the commodification of human life. As we look to the future under the guidance of Pope Leo XIV, who opened his papacy on 8 May 2025 with the universal call, "**Peace be with all of you,**" DOBCEL reaffirms its commitment to building that peace through improving our ethical supply chains.

True peace cannot exist where human dignity is compromised by the systemic human rights crisis unfolding before us. Both near and afar, our brothers and sisters experience severe forms of exploitation driven by poverty, conflict, and economic displacement.

In accordance with our statutory obligations under the Commonwealth Modern Slavery Act 2018, we answer these papal calls by implementing systematic due diligence to target and eliminate exploitation across our operations, including:

- Deceptive recruiting for labour or services
- Forced labour and debt bondage
- Human trafficking and servitude
- Forced marriage
- The worst forms of child labour



Figure 1: Pope Francis with Robert Francis, Cardinal Prevost, now Leo XIV (Vatican Media)



Declaration

Modern Slavery Act 2018 (CTH) - Statement Annexure

Principal Governing Body Approval

This Modern Slavery Statement was approved by the Board of Diocese of Ballarat Catholic Education Limited (DOBCEL) as defined by the Modern Slavery Act 2018 (Cth) ("the Act") on 16th June 2026. This modern slavery statement is signed by a responsible member of DOBCEL as defined by the Act.

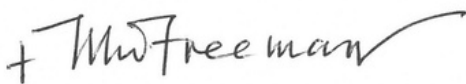
Mr Eugene Dalton
Board Director and Chair
Diocese of Ballarat Catholic Education Limited



Signature of Responsible Member

This Modern Slavery Statement was approved by the principal governing body of DOBCEL as defined by the Modern Slavery Act 2018 (Cth) ("the Act") on 16th June 2026. This modern slavery statement is signed by a responsible member of DOBCEL as defined by the Act.

Bishop Mark Freeman
Bishop of Ballarat and Company Member
Diocese of Ballarat Catholic Education Limited
Signature of Responsible Member

A handwritten signature in black ink that reads "Bishop Mark Freeman".

**"The Lord has loved me so much:
we must love everyone...
we must be compassionate!"
- Saint Josephine Bakhita**

Figure 2: Image Title: St Josephine Bakhita ...
Image Source: MARCIN MAZUR
Copyright: © Mazur/catholicnews.org.uk Flickr
License: [CC BY-NC-ND 2.0](https://creativecommons.org/licenses/by-nc-nd/2.0/)



Bishop Mark Freeman's Forward

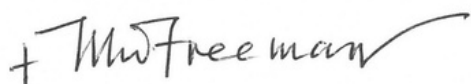
As a community stretching from the Murray to the Sea, the Catholic Diocese of Ballarat is grounded in the sacred dignity of every human person. Made in the image and likeness of God, every individual possesses an inherent dignity that can never be bought, sold, or measured by commercial productivity. Modern slavery cruelly strips this away from the most vulnerable. Standing together as a diocesan family, we are compelled by the Gospel to confront this injustice and eliminate modern slavery as a vital expression of our Christian faith.

Underpinned by Strategy 2035, DOBCEL is committed to a high-performing system of Catholic schools that delivers excellent educational outcomes while fostering "Fullness of Life for All." This vision relies on our foundational pillars of compassion, safety, and respect. To extend these values to our operations, we actively manage ethical risks in procurement across our 57 school communities. We acknowledge that delivering technology-rich learning environments introduces modern slavery risks, particularly within building and construction, information and communications technology (ICT), facilities management, and the textiles and apparel industries.

This fifth Modern Slavery Statement outlines DOBCEL's progress during 2025 to assess, address, and mitigate these risks within our operations and supply chains. Centralising cleaning contracts across our 57 schools has been a key strategic action this year, significantly strengthening vendor oversight. Furthermore, through the ongoing rollout of our *Laudato Si'* Action Plan, DOBCEL continues to deliver targeted internal training, empowering our entire workforce to recognise their vital role in this collective effort.

While proud of our 2025 achievements, we recognise that eradicating modern slavery requires an enduring commitment. Sustained vigilance, regular policy updates, and continuous structural refinement remain essential to achieving total transparency across all commercial operations. As we publish this statement, we pray for the protection, relief, and safety of all victims of exploitation. May survivors experience deep healing, and may our collective diocesan actions always reflect true justice, mercy, and compassion.

Sincerely,



Mark Freeman

Bishop of the Diocese of Ballarat



Forward

As the Executive Director of Diocese of Ballarat Catholic Education Limited (DOBCEL), I am pleased to present our 2025 Modern Slavery Statement. This report outlines our ongoing commitment to identifying and mitigating the risks of modern slavery within our operations and supply chains, a mission that is deeply rooted in our Catholic identity and our call to protect the inherent dignity of every human person.



The launch of the DOBCEL Strategy 2035: Pursuing Fullness of Life for All has provided a powerful 10-year framework for this work. In this inaugural year of the strategy, we have focused on "sense-making"—helping our school communities understand how ethical stewardship and social justice are essential to a high-performing system. As we address the "cry of the poor," we recognise that our purchasing power and educational influence are vital tools in the global fight against exploitation.

Throughout 2025, we achieved significant milestones in building the capability of our staff and students. More than 760 staff participated in professional learning, exploring the intersection of *Laudato Si'* and modern slavery. Our students have also led the way, with nearly 400 young people engaging in workshops focused on ethical procurement and the "Seed of Hope" initiative. These actions demonstrate that our schools are not just places of academic learning, but hubs of advocacy and ethical action.

Our work this year aligns with the urgent call from Pope Leo XIV, who reminded us in his 2026 message that "peace begins with dignity". By scrutinising our supply chains and empowering our students to be ethical consumers, we are participating in the Church's global effort to end the "grave crime" of human trafficking.

While we celebrate the 109 hours of strategic planning dedicated by our schools this year, we acknowledge that this is a journey of continuous improvement. In the coming year, we will further strengthen our due diligence processes and deepen our collaboration with the Australian Catholic Anti-Slavery Network (ACAN).

I wish to thank our principals, teachers, and staff for their "bold and brave" commitment to this work. Together, we are ensuring that Catholic education in the Diocese of Ballarat remains a light of hope and a guardian of human dignity for all.

With every blessing,

Mr Tom Sexton
Executive Director



Reporting Criteria 1

About Us

Our Vision

As partners in Catholic education and open to God's presence, we pursue fullness of life for all.

Our Mission

- proclaiming and witnessing the Good News of Jesus Christ
- ensuring quality learning that promotes excellence and fosters the authentic human development of all
- living justly in the world, in relationship with each other and in harmony with God's creation
- exploring, deepening and expressing our Catholic identity in diverse ways
- enabling each one of us to reflect more fully in the image of God.



About Us

Diocese of Ballarat Catholic Education Limited (DOBCEL) is the governing body for Catholic schools within the Diocese of Ballarat. Under the spiritual leadership of Bishop Mark Freeman, DOBCEL serves a vast community across Western Victoria, stretching from the Murray River to the Southern Ocean.

Supported by five regional offices, DOBCEL partners with 63 schools and acts as the sole governing authority for 57 of these. This network provides a faith-based, high-quality education to 13,436 students.

Guided by the DOBCEL Strategy 2035, our mission is to pursue the "fullness of life for all." We focus on five strategic pillars: Collaborative Cultures, Engagement and Belonging, School as Community, Rich Pedagogical Practices, and Sustainable Stewardship. Through this framework, DOBCEL ensures a safe, inclusive, and nurturing environment where every student is empowered to flourish academically, socially, and spiritually.

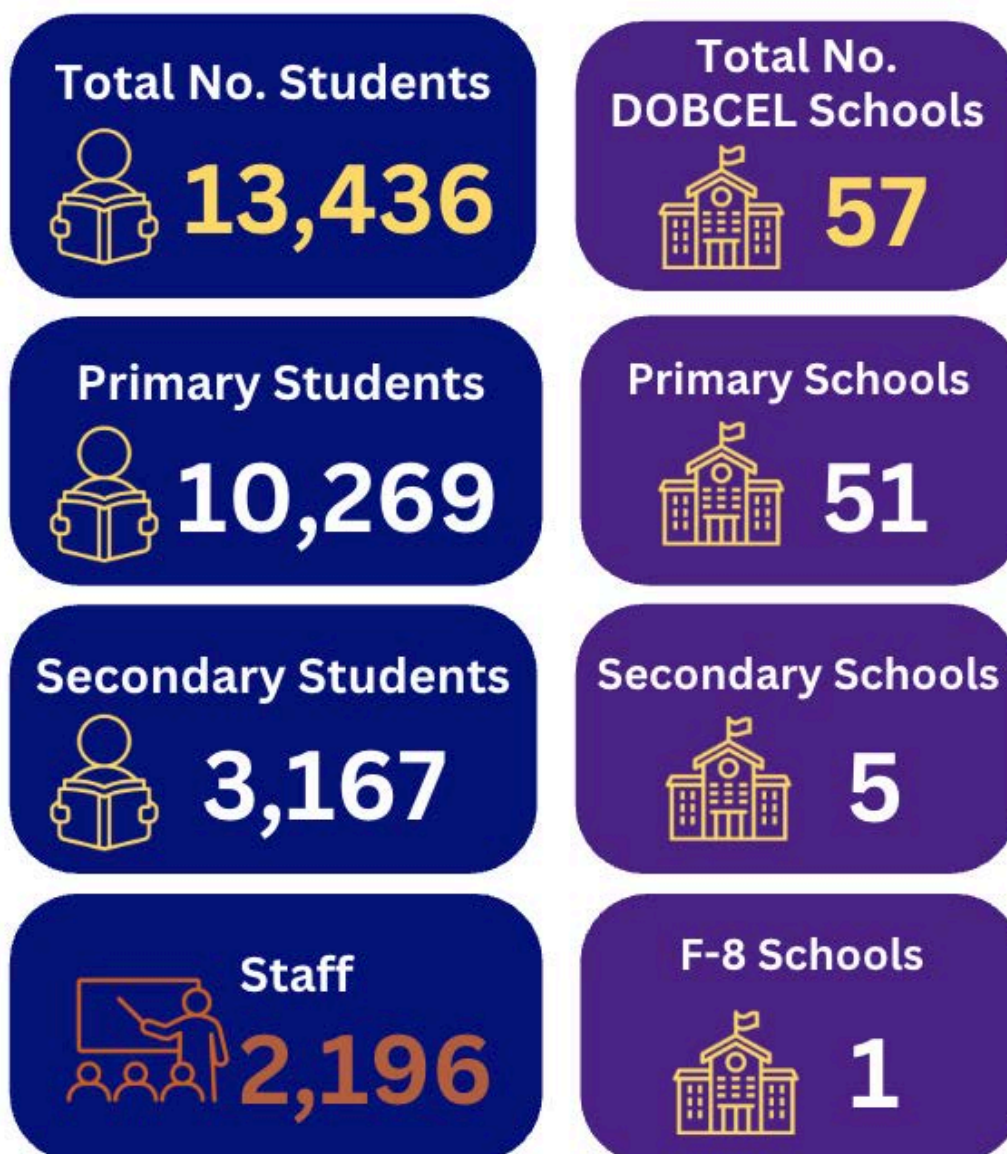


Figure 1: DOBCEL Services



Our 57 DOBCEL Schools



Alfredton – St Thomas More Primary School
Cuthberts Road, Alfredton VIC



Ararat – St Mary's Primary School
Moore Street, Ararat VIC



Ballan – St Brigid's Primary School
98 Inglis Street, Ballan VIC



Ballarat – St Patrick's Primary School
119 Drummond Street South, Ballarat VIC



Ballarat East – St Alipius Parish Primary School
106-108 Victoria Street, Ballarat East VIC



Ballarat East – St Francis Xavier Primary School
100 Fortune Street, Ballarat East VIC



Ballarat North – St Columba's School
305 Howard Street, Ballarat North VIC



Camperdown – Mercy Regional College
Henderson Street, Camperdown VIC



Camperdown – St Patrick's Primary School
4 Dimora Avenue, Camperdown VIC



Casterton – Sacred Heart Primary School
39 Robertson Street, Casterton VIC



Charlton – St Joseph's Primary School
25 Watson Street, Charlton VIC



Colac – Sacred Heart Primary School
125 Hart St, Colac VIC



Colac – St Mary's Catholic Primary School
19-27 Colvert Street, Colac VIC



Colac – Trinity College Colac
89 Hart Street, Colac VIC



Clarks Hill – St Mary's Primary School
131 Powell Rd, Clarks Hill VIC



Coleraine – St Joseph's Primary School
67 Read Street, Coleraine VIC
67 Read Street, Coleraine VIC



Coragulac – St Brendan's Primary School
727 Corangamite Lake Road, Coragulac VIC



Creswick – St Augustine's Primary School
119 Napier Street, Creswick VIC



Daylesford – St Michael's Primary School
29 Smith Street, Daylesford VIC



Delacombe – Lumen Christi Primary School
111 Whitelaw Avenue, Delacombe VIC



Dennington – St John's Primary School
263 Russell Street, Dennington VIC



Donald – St Mary's Primary School
134 Woods Street, Donald VIC



Edenhope – St Malachy's Primary School
34 Lake Street, Edenhope VIC



Gordon – St Patrick's Primary School
1564 Old Melbourne Road, Gordon VIC



Hamilton – St Mary's Primary School
49 Heller Lane, Hamilton VIC



Hopetoun – St Joseph's Primary School
33 Loscelles Street, Hopetoun VIC



Horsham – St Michael's Primary School
7 Melachton Street, Horsham VIC



Horsham – St Brigid's College
97 Robinson Street, Horsham VIC



Kororoit – St Patrick's Primary School
Queen Street, Kororoit VIC



Lucas – Siena Catholic Primary School
180 Eleanor Drive, Lucas VIC



Maryborough – St Augustine's Catholic Primary School
58 Burke Street, Maryborough VIC



Merbein – Our Lady of the Sacred Heart Primary School
18 Box Street, Merbein VIC



Mildura – Sacred Heart Primary School
168 Twelfth Street, Mildura VIC



Mildura – St Paul's Primary School
716 Fourteenth Street, Mildura VIC



Mortlake – St Colman's Primary School
28 Dunlop St, Mortlake VIC



Mount Clear – Damascus College
1412 Geelong Road, Mount Clear VIC



Mount Clear – Emmaus Catholic Primary School
1503 Geelong Road, Mount Clear VIC



Murtoa – Our Lady Help of Christian's Primary School
15 Munro Street, Murtoa VIC



Nhll – St Patrick's Primary School
29 Leahy Street, Nhll VIC



Penshurst – St Joseph's Primary School
11 Martin Street, Penshurst VIC



Port Fairy – St Patrick's Primary School
9-11 William Street, Port Fairy VIC



Portland – All Saints Primary School
Lawthrop Street, Portland VIC



Red Cliffs – St Joseph's Primary School
17 Fitzroy Avenue, Red Cliffs VIC



Redan – St Aloysius Primary School
800 Ripon Street South, Redan VIC



Robinvale – St Mary's F-B School
12 Watkin Street, Robinvale VIC



Sea Lake – St Mary's Primary School
47 Hannon Street, Sea Lake VIC



Sebastopol – St James' Primary School
260 Albert Street, Sebastopol VIC



St Arnaud – St Patrick's Primary School
5 Wattle Street, St Arnaud VIC



Stawell – St Patrick's Primary School
55 Patrick Street, Stawell VIC



Swan Hill – St Mary MacKillop College
53 McCree Street, Swan Hill VIC



Swan Hill – St Mary's Primary School
2 Munro Street, Swan Hill VIC



Terang – St Thomas' Primary School
1 Lyons Street, Terang VIC



Warracknabeal – St Mary's Primary School
2-8 Campbell Street, Warracknabeal VIC



Warrnambool – St Joseph's Primary School
70 Botanic Road, Warrnambool VIC



Warrnambool East – Our Lady Help of Christian's Primary School
28 Selby Road, Warrnambool East VIC



Warrnambool West – St Pius X Primary School
32-34 Hoddle Street, Warrnambool West VIC



Wendouree – Our Lady Help of Christian's Primary School
480A Gilles Street, Wendouree VIC



The DOBCEL Strategy 2035: Pursuing Fullness of Life for All

The DOBCEL Strategy 2035 is a transformative 10-year framework (2025–2035) designed to guide DOBCEL schools toward a future of high performance, equity, and genuine student agency. While current data confirms our system is performing strongly, we recognise that standing still is not an option in a rapidly evolving global landscape. Furthermore, we remain committed to addressing the inherent and unacceptable educational disadvantages that persist for students in regional and rural areas compared to their metropolitan counterparts.

In response, the DOBCEL Board and the wider community have co-designed a strategy that is both bold and brave. Developed in collaboration with renowned education expert Professor Pasi Sahlberg, this framework moves away from traditional top-down models, instead prioritising deeper collaboration, networked local innovation, and collective autonomy and agency.

Pursuing Fullness of Life for All represents a strategic commitment to driving systemic excellence over the next decade and beyond—ensuring that every school in our Diocese is an empowered hub of learning, inclusion, and hope.

To become a high-performing system of Catholic schools, DOBCEL Strategy 2035 will build on the foundation of our Catholic identity and focus on five key pillars:



Figure 2: Pursuing Fullness of Life - Key Pillarsum

Guided by our vision, we will move towards our goal through three practical principles:

- Deeper collaboration: Systematic efforts to enable deeper cooperation in and between schools, combined with building social capital across the DOBCEL system.
- Networked ground-up innovation: Purposeful investments, initiating local innovation and renewal of learning and teaching through co-designed school improvement.
- Collective autonomy and agency: Schools understand that they are trusted to make the best decisions for those in their care, and understand their mutual obligation to the Governing Authority and the responsibilities that they carry. Schools are more connected to one another, and that student voice, agency and active engagement in school is prioritised.

Implementation Timeline (2025)

2025: A year for schools to 'make sense' of the new strategy, gather baseline data, and start collaborating, with 57 school budgets endorsed for alignment.



Figure 3: Pursuing Fullness of Life - Our Strategy on a Page

Reporting Criteria 2

DOBCEL - Operations and Supply Chains

DOBCEL - Governance Framework

Establishment and Authority

DOBCEL is a company limited by guarantee to serve as the governing body for schools within the Diocese. Led by a Bishop-appointed Board of Directors, DOBCEL ensures consistency, transparency, and professionalism in governance.

In this capacity, the Board oversees all legal and compliance obligations, including adhering to the *Corporations Act*, *ACNC Act* governance standards, and Victorian school registration requirements. Crucially, the Board holds ultimate responsibility for managing child safety (Ministerial Order 1359), overseeing systemic risk, and ensuring the strategic financial and operational health of all DOBCEL schools.

Collaborative Leadership

The Board operates in close collaboration with the Bishop, who serves as both the ecclesiastical leader and the member of the company. This partnership ensures that education policies—while approved by the Board—are developed in consultation with the broader diocesan community, maintaining a Christ-centred focus across the system.



Delegated Management

To ensure effective day-to-day operations, the Board utilises a clear framework of delegation:

- **Executive Director:** The Board delegates the operational management of the system to the Executive Director of Catholic Education Ballarat, who reports on policy implementation and risk management.
- **Principals:** School Principals are empowered through specific delegations to lead their communities, manage staff, and ensure local compliance with DOBCEL's strategic vision.



For school regulation purposes, the Board is structured to enable:

- **Effective Strategic Direction:** Developing and overseeing the long-term vision for the system of schools.
- **Financial Management:** Ensuring robust oversight of the finances of all DOBCEL schools.
- **Legal Compliance:** Fulfilling legal obligations for each individual school as the governing authority.



Regulatory Context

This structure is specifically designed to meet the requirements of the Education and Training Reform Regulations 2017, ensuring that DOBCEL operates as a compliant "incorporated legal entity" for government funding and school registration purposes.

Governance Integration

To support these three pillars, the Board utilises several key mechanisms:

- **Board Committees:** Specialist groups like the Audit and Risk Committee (ARC) provide detailed oversight and report directly to the Board to ensure financial transparency.
- **Bishop Ratification:** While the Board develops and approves policies, they must be ratified by the Bishop to ensure alignment with the Diocese's mission.
- **Systemic Accountability:** The Board is the legal employer of all staff and the responsible entity for all regulatory and educational obligations across the 57 DOBCEL schools.

Governance Chart

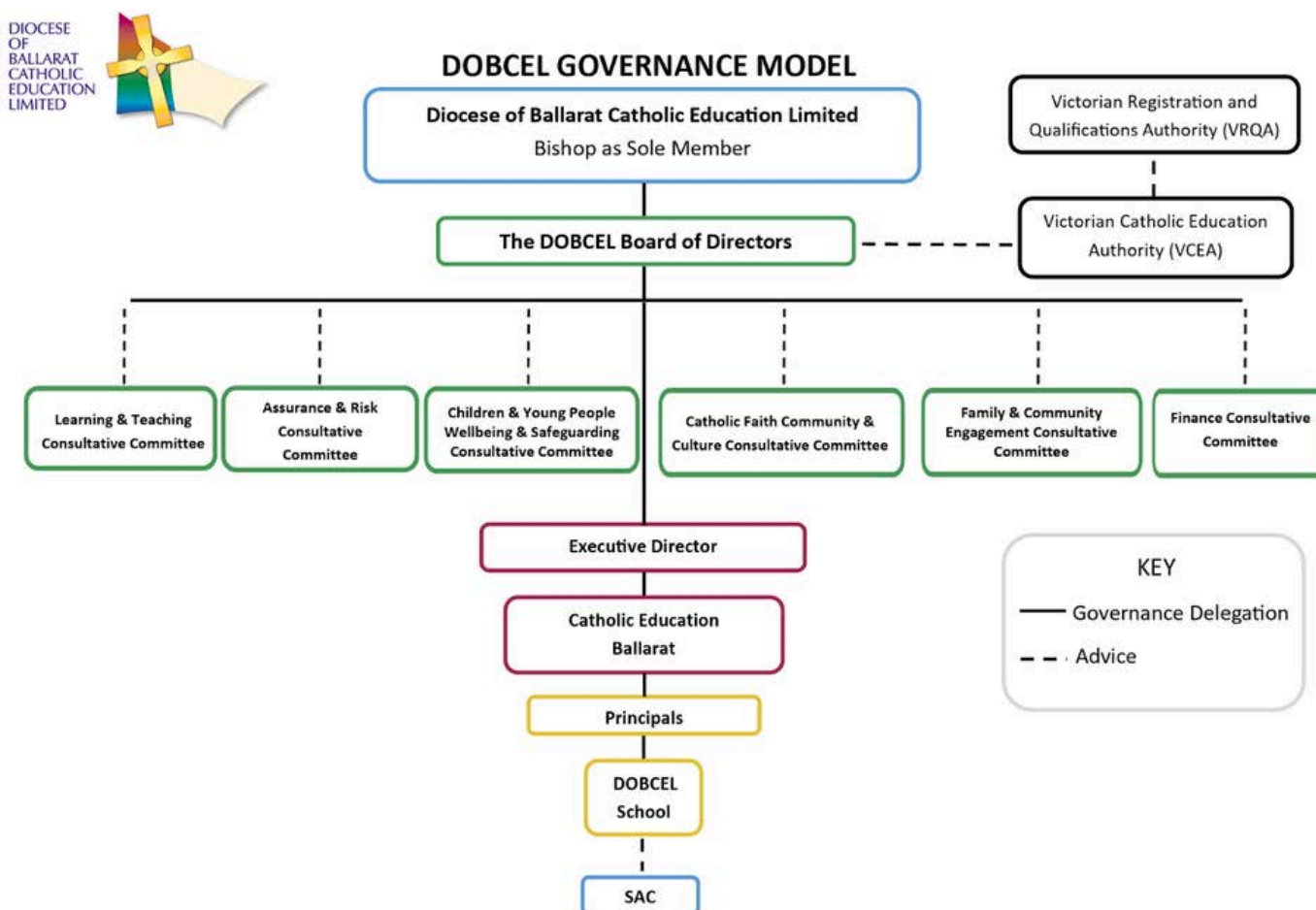


Figure 4: DOBCEL Governance Chart



Executive Leadership and Governance

The Catholic Education Ballarat (CEB) Office, acting as the administrative arm of DOBCEL, provides the strategic leadership and governance framework for all 57 schools within the Diocese. At the helm is the Executive Director, who holds delegated authority from the DOBCEL Board to manage the system's operational, educational, and financial performance. The Executive Director is directly supported by the Directorate, including Deputy Director of Catholic Education, Deputy Director of Stewardship, Assistant Director of People and Development and Assistant Director of Business Services, who oversee key portfolios. These include Catholic Identity and Mission, Learning and Teaching, Wellbeing, Office Finance, School Finance, IT and Cybersecurity, SIMON, Risk & Assurance, Safeguarding, Property & Infrastructure, Employee Relations, Organisational Development, Strategy Implementation and Marketing and Communications, thereby ensuring that the Diocese's mission is translated into effective systemic action.

Specialist Support and Operations

The Business Services and Stewardship teams manage high-level stewardship and capital development, while the People and Development team oversees human resources and Finance for 2,196 employees. Furthermore, the Policy, Risk and Assurance team provides a robust compliance framework, ensuring that all schools meet their legal and regulatory obligations, including those related to Child Safe Standards and modern slavery reporting.

Educational Services and Wellbeing

To support the diverse needs of students and staff, CEB hosts a multi-disciplinary Wellbeing and Diverse Learning team. This group consists of specialised consultants, psychologists, and speech pathologists who provide direct expertise to school communities. Additionally, the Teaching and Learning teams focus on pedagogical innovation and the implementation of the DOBCEL Strategy 2035, driving excellence in religious education and core curriculum areas across the regional landscape.



“Let us thank all those who teach in Catholic schools.
Educating is an act of love; it is like giving life.”

- Pope Francis, Pontifex: 1 March 2014



Catholic Education Ballarat Organisational Chart

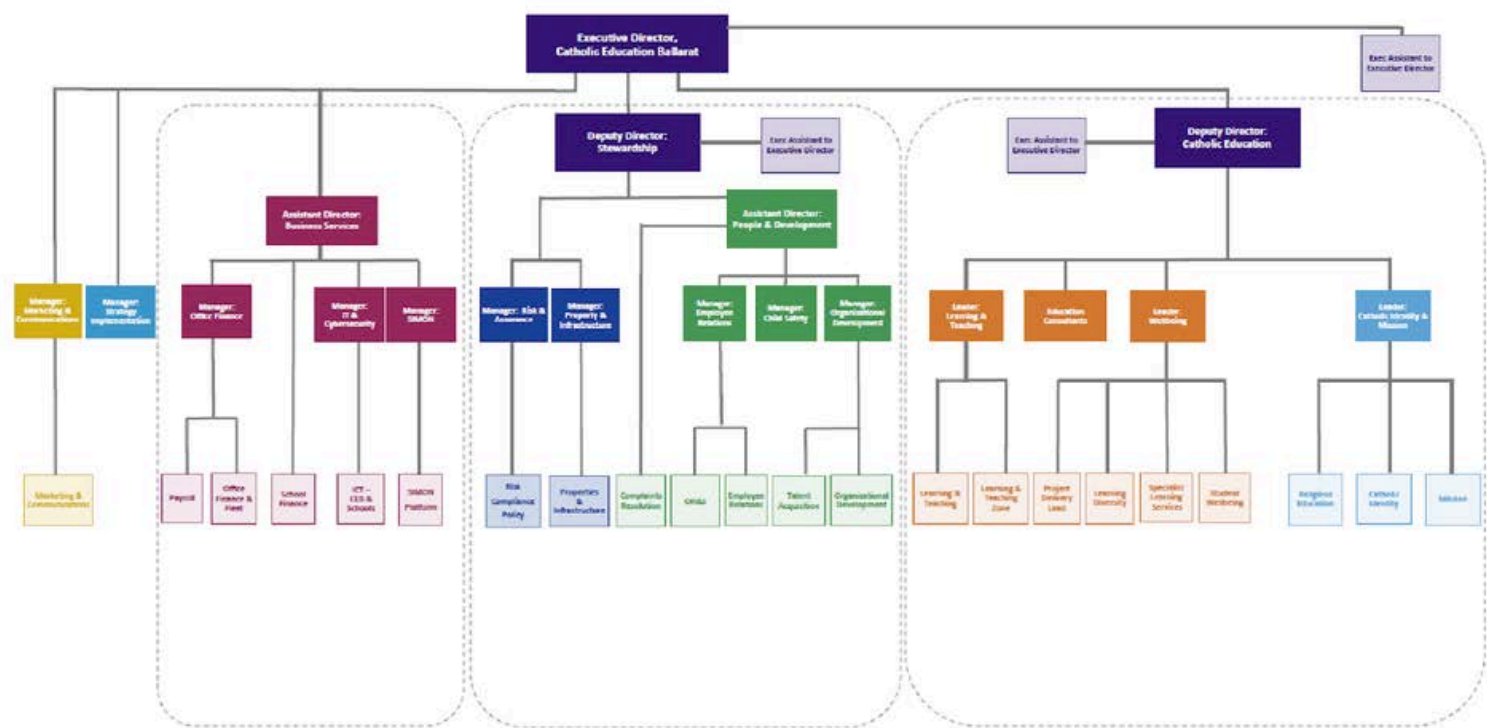


Figure 5: CEB Organisational Chart





The Catholic Diocese of Ballarat covers a vast landscape, spanning the western third of Victoria from the Murray River to the Southern Ocean. To ensure rigorous governance and localised risk oversight, DOBCEL employs a tailored leadership structure: our Secondary schools fall under their own unique umbrella, guided by a dedicated Secondary Education Consultant. Meanwhile, our Primary network is managed through four geographical zones, Central, Mid-Northern, Northern, and Southern, each overseen by their own specialised Education Consultant.

Recognising this extensive geography, the CEB structure extends beyond its central Lake Wendouree location through four key Regional Service Centres in Horsham, Mildura, Swan Hill, and Warrnambool. This decentralised model ensures that professional services and leadership support remain accessible to even our most remote school communities. By utilising this zonal structure, DOBCEL maintains a "ground-up" approach to compliance, ensuring that Child Safe Standards and modern slavery due diligence are consistently applied across all 57 schools and their respective supply chains.

DOBCEL Office Locations

- Ballarat Office (Main Office): 200 Gillies Street North, Lake Wendouree VIC 3350
- Horsham Service Centre: 6A McLachlan Street, Horsham VIC 3400
- Mildura Service Centre: 64 Lemon Avenue, Mildura VIC 3500
- Swan Hill Service Centre: 2 Murlong Street, Swan Hill VIC 3585
- Warrnambool Service Centre: 92a Liebig Street, Warrnambool VIC 3280



Annual Turnover or Consolidated Revenue

For the reporting period of 1 January 2025 to 31 December 2025, the consolidated revenue for DOBCEL was \$338.6 million.

Workforce Profile

For the 2025 reporting period, DOBCEL maintained a workforce of 2,196 direct employees. This team comprised of teaching, administrative, and support staff across the 57 schools and the central management office within the Diocese.

Workforce breakdown

- **Teaching Staff:** 61% (approx. 1,340 employees)
- **Non-Teaching & Support Staff:** 39% (approx. 856 employees)



Figure 6: DOBCEL workforce profile

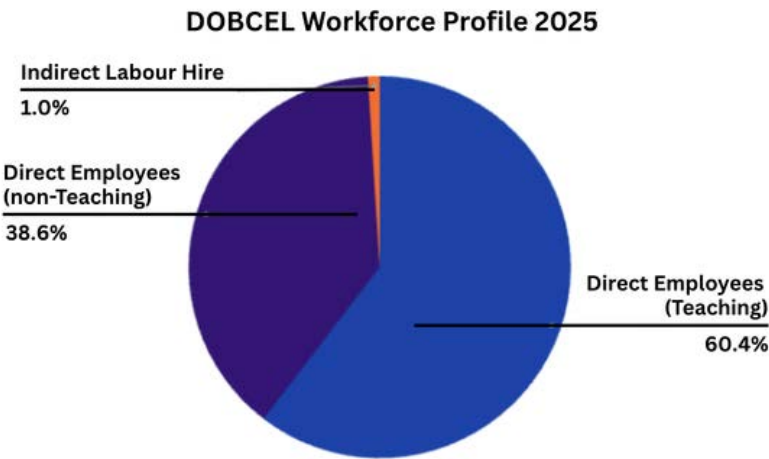


Figure 7: DOBCEL Workforce Profile - Direct Employees (Teaching), Direct Employees (Non-Teaching) & Indirect Labour Hire

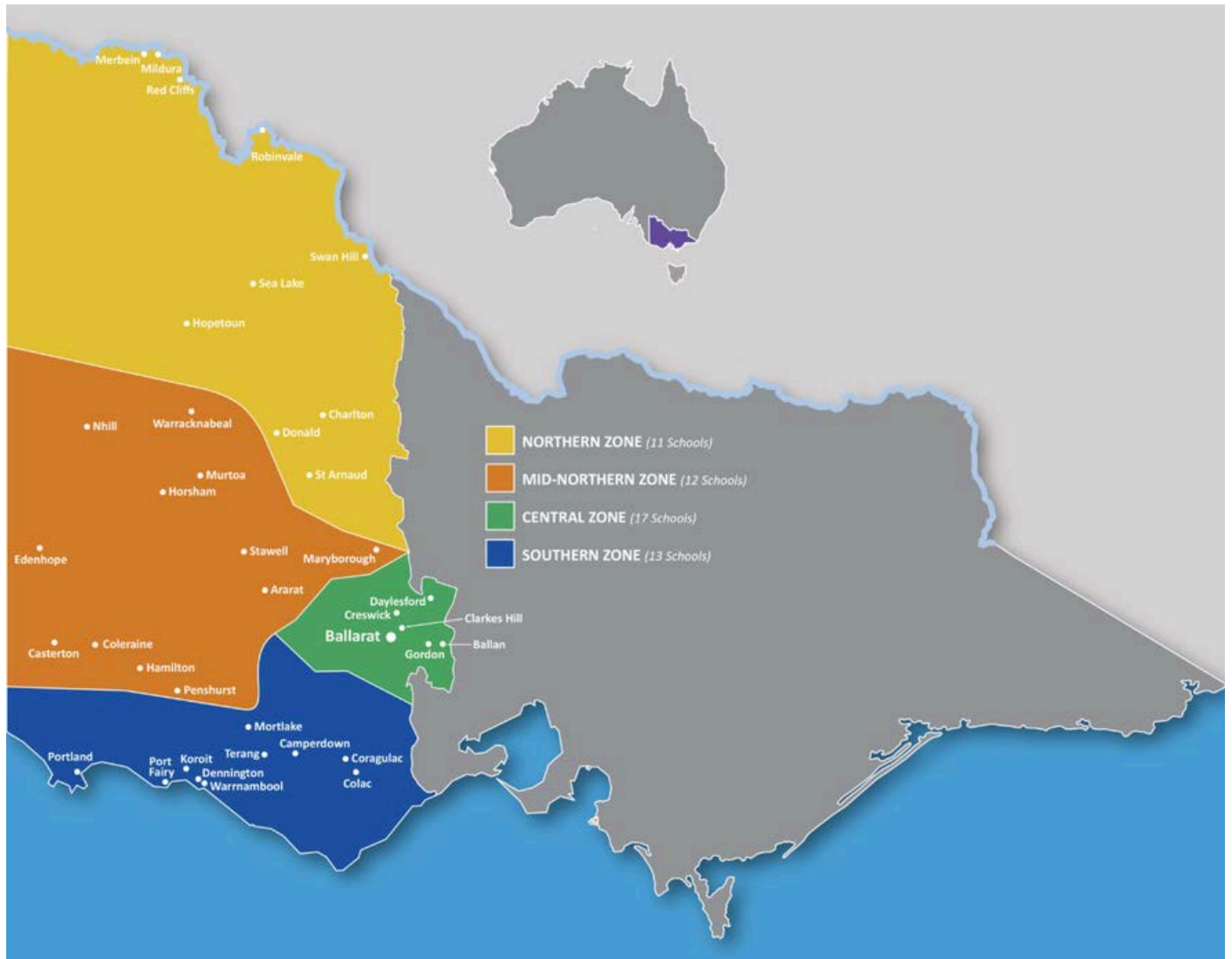


Figure 8: DOBCEL - Catholic Education Ballarat (CEB) Zones Map



DOBCEL Operations and Supply Chains

Operational Overview

As a regional education provider, DOBCEL's primary expenditure is dedicated to the salaries and professional entitlements of our teachers, school leaders, and support staff. These employment-related costs represent the vast majority of our annual spend, ensuring a high level of transparency and direct oversight across our workforce. For the 2025 reporting period, DOBCEL recorded a consolidated revenue of \$338.6 million, which supports the operations of 57 schools and administrative services across the Diocese.

Workforce Profile: Direct and Indirect Employment

DOBCEL prioritises a direct employment model to ensure the highest standards of pedagogical consistency, fair remuneration, and student safety. By maintaining this preference over third-party labour hire, DOBCEL retains direct control over wage compliance and workplace conditions, significantly reducing the risk of exploitation.

- **Direct Workforce:** Comprising 2,196 employees, our core educational delivery and school support staff are managed through direct permanent, fixed-term, or casual contracts.
- **Indirect Workforce:** For the 2025 reporting period, the use of indirect labour remained a minor component of our profile, primarily utilised to fill specialised skill gaps or manage short-term capital requirements. These engagements include:
 - **Professional Services & Allied Health:** Legal counsel, IT consultants, and specialists (e.g., speech pathologists) supporting student wellbeing.
 - **Facilities & Infrastructure:** External contractors engaged for specific capital works projects and technical maintenance.



Supply Chain Management

DOBCEL increasingly manages its supply chains through a developing procurement model designed to standardise ethical standards. As part of our Strategy 2035 rollout, we are working towards sustainable stewardship by prioritising reputable suppliers who align with Catholic social teaching and respect human dignity.



High-Risk Supply Chain Sectors

DOBCEL has identified the following sectors as requiring enhanced due diligence due to their inherent risks:

- **Building & Construction:** Specifically flagged for monitoring regarding potential labour exploitation within multi-tiered subcontracting and the sourcing of raw materials during major capital projects.
- **Information Technology (ICT):** Identified as a high-risk category due to the complex and opaque global manufacturing origins of hardware and digital infrastructure components.
- **Facilities Management:** Includes cleaning, security, and groundskeeping services; sectors traditionally identified as higher-risk for labour standard non-compliance.
- **Textiles (Uniforms):** DOBCEL has commenced monitoring this sector to address the limited visibility often associated with global textile manufacturing and garment supply chains.

Governance and Procurement Controls

To mitigate risks, DOBCEL operates under a rigorous financial delegation and procurement framework. All high-cost engagements are subject to tiered approval thresholds:

- **Quotes & Tenders:** Expenditures exceeding \$15,000 require a minimum of three written quotes. Non-capital contracts over \$50,000 and capital works over \$100,000 necessitate a formal tender process to ensure supplier transparency.
- **Vetted Suppliers:** Schools are encouraged to screen preferred suppliers through platforms like Shop Ethical to ensure compliance with ethical labour practices.
- **Cleaning Services Oversight:** Individual schools manage daily cleaning performance. Cleaning providers must either be directly employed via DOBCEL payroll or engaged via a vetted external contractor who adheres to mandatory Child Safe Standards (Ministerial Order 1359).



Strategic Focus: "Sense-Making"

In 2025, our primary goal was "sense-making"—collaborating with our school communities to baseline current supply chain practices. Through our membership with the Australian Catholic Anti-Slavery Network (ACAN), we participated in joint assessments to increase visibility into our supply chain and inform future ethical sourcing.

Ethical Governance and Values

DOBCEL recognises that “every person ought to have the awareness that purchasing is always a moral – and not simply an economic – act” (Pope Francis, 2014 World Day of Peace message). To operationalise this teaching, DOBCEL has developed clear procurement values that integrate professional governance with its Catholic mission. These values are explicitly defined in the DOBCEL Procurement and Purchasing Policy and Procedure and the DOBCEL Strategy 2035.

“Every person ought to have the awareness that purchasing is always a moral – and not simply an economic – act”. Pope Francis (2014)

Core Procurement Values

The following principles guide all purchasing decisions across the Diocese:

- **Probity, Accountability, and Transparency:** These are the foundational requirements for managing company finances effectively and ensuring the public's confidence in school activities.
- **Sustainable Stewardship:** A key pillar of Strategy 2035 that ensures all financial and natural resources are invested in ways that optimally benefit students, schools, and the wider community.
- **Value for Money:** Decisions are based on a balance of financial and non-financial factors—including cost, quality, and the supplier's ability to meet specifications—to achieve the best possible outcomes.
- **Ethical Use of Resources:** Procurement activity must be conducted in the best interests of the system, with a specific focus on the ethical use of taxpayer and community funds.



Decision-Making Principles

To maintain high standards of integrity, DOBCEL schools must:

- **Act with Integrity:** Decisions must be evidence-based and free from personal or familial favouritism.
- **Maintain Impartiality:** Staff must avoid activities that could be perceived as impinging on their impartiality, such as accepting gifts or gratuities from suppliers.
- **Ensure Consistency:** The centralised policy provides direction and clarity to all 57 schools to ensure professional governance standards are met diocese-wide.

Incidents and Escalation Framework

DOBCEL maintains a robust governance framework to ensure the timely escalation of modern slavery issues to the Board. Any identified risks are managed through our Policy, Risk & Assurance team and reported to the Audit, Risk and Finance Standing Committee (ARFSC). The Executive Director ensures that the Board is kept informed of any high-level risks or incidents, allowing for immediate strategic oversight and corrective action.



Reporting Criteria 3

Modern Slavery Risks

Risk Assessment

For Catholic entities, modern slavery risks are defined by the ACAN Category Risk Taxonomy, a classification standard that identifies severity of actual or potential harm to people (saliency) in spend categories.

The ACAN Category Risk Taxonomy is based on sources such as:

- the Global Slavery Index
- the International Labour Organisation (ILO), including definitions of modern slavery
- the Bureau of International Labour Affairs (ILAB), U.S Department of Labour
- the Global Child Forum and UNICEF

Key factors are also used to determine the level of risk:

- Geography: the country or location where a good is made or service is delivered
- Industry: the sector in which the making of goods or delivery of service occurred
- Commodity: the raw materials or components that comprise the goods or products
- Workforce vulnerability: such as bonded visas, temporary migrants, women or children known to be employed in specific industry sectors
- Domus 8.7: trends, cases, and risk intelligence identified through the Domus 8.7 remediation service, including grievances and remediation insights relevant to category and risk to workers.



Classification

High Risk	Medium Risk	Low Risk
• Building and construction • Cleaning and Security • Events and event management • Facility management and property maintenance • Finance and Investment • Food and catering services • Furniture and office supplies • ICT Hardware • ICT Software and network services - offshore • Labour Hire • Linen, laundry and textile products • Medical devices and supplies • Transport, logistic and warehousing • Uniforms and PPE • Waste management services	• Advertising & Marketing • ICT Software and network services - onshore • Utilities • Fleet management, consumables and maintenance • Travel and accommodation • Print / Mail Provider	• Professional services • Financial expenses • Government and agency fees • License / membership fees

Figure 7: ACAN Risk Taxonomy Classification

Note: The following categories are Not in Scope of the ACAN Category Risk Taxonomy

- **Pastoral**
- **Payroll** (excluding labour-hire and sub-contracting)

Spend Data Analysis

DOBCEL High Risk Spend Categories

For the 2025 calendar year, DOBCEL has identified that its high-risk spend is concentrated in four primary procurement categories. These categories have been prioritised based on the complexity of their supply chains and the inherent risk of labour exploitation within these industries:

- **Building and Construction:** Representing a significant portion of our capital expenditure, this sector is flagged due to the risks associated with multi-tiered subcontracting and the offshore sourcing of raw materials.
- **Information and Communication Technology (ICT):** Spend in this category involves the procurement of hardware and digital infrastructure, which are subject to high modern slavery risks within global electronics manufacturing hubs.
- **Facilities Management:** This includes ongoing expenditure for cleaning, security, and groundskeeping services—sectors traditionally recognised for their reliance on vulnerable or temporary labour forces.
- **Textiles and Apparel:** Focused on the procurement of school uniforms, this category is monitored due to the historical lack of transparency in international garment supply chains.

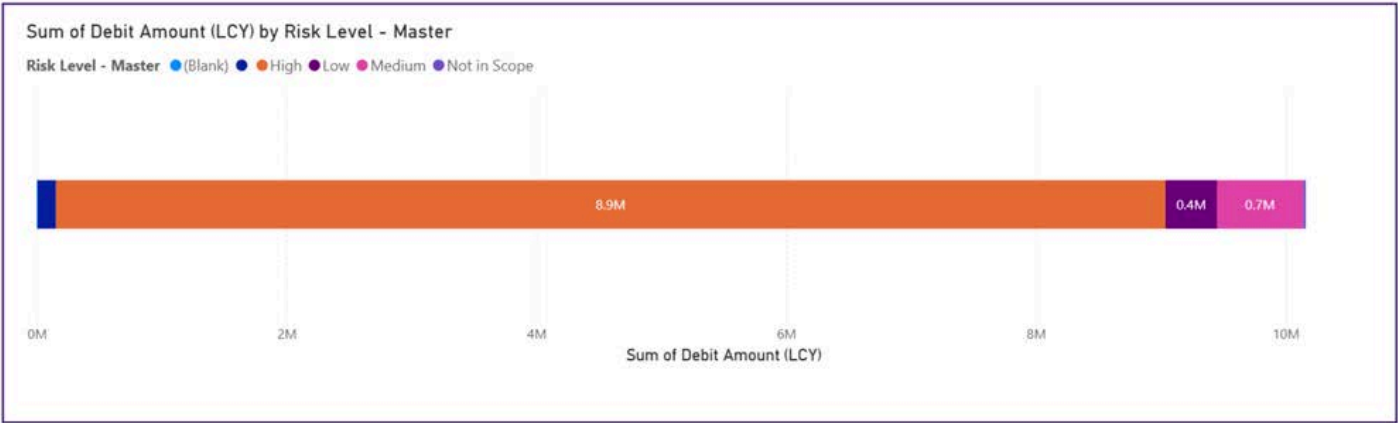


Figure 9: DOBCEL Sum of Debit by High Risk Level

Oversight of High-Risk Expenditure

To uphold our ethical values, DOBCEL applies enhanced due diligence to all high-risk sector engagements exceeding our \$15,000 quotation threshold. Additionally, major service contracts over \$50,000 and capital works over \$100,000 require formal tender processes. In partnership with the Australian Catholic Anti-Slavery Network (ACAN), we require suppliers to complete the ACAN Supplier Survey to disclose their labour practices. This comprehensive oversight ensures our \$338.6 million in consolidated revenue supports human dignity and complies fully with the Modern Slavery Act 2018 (Cth).



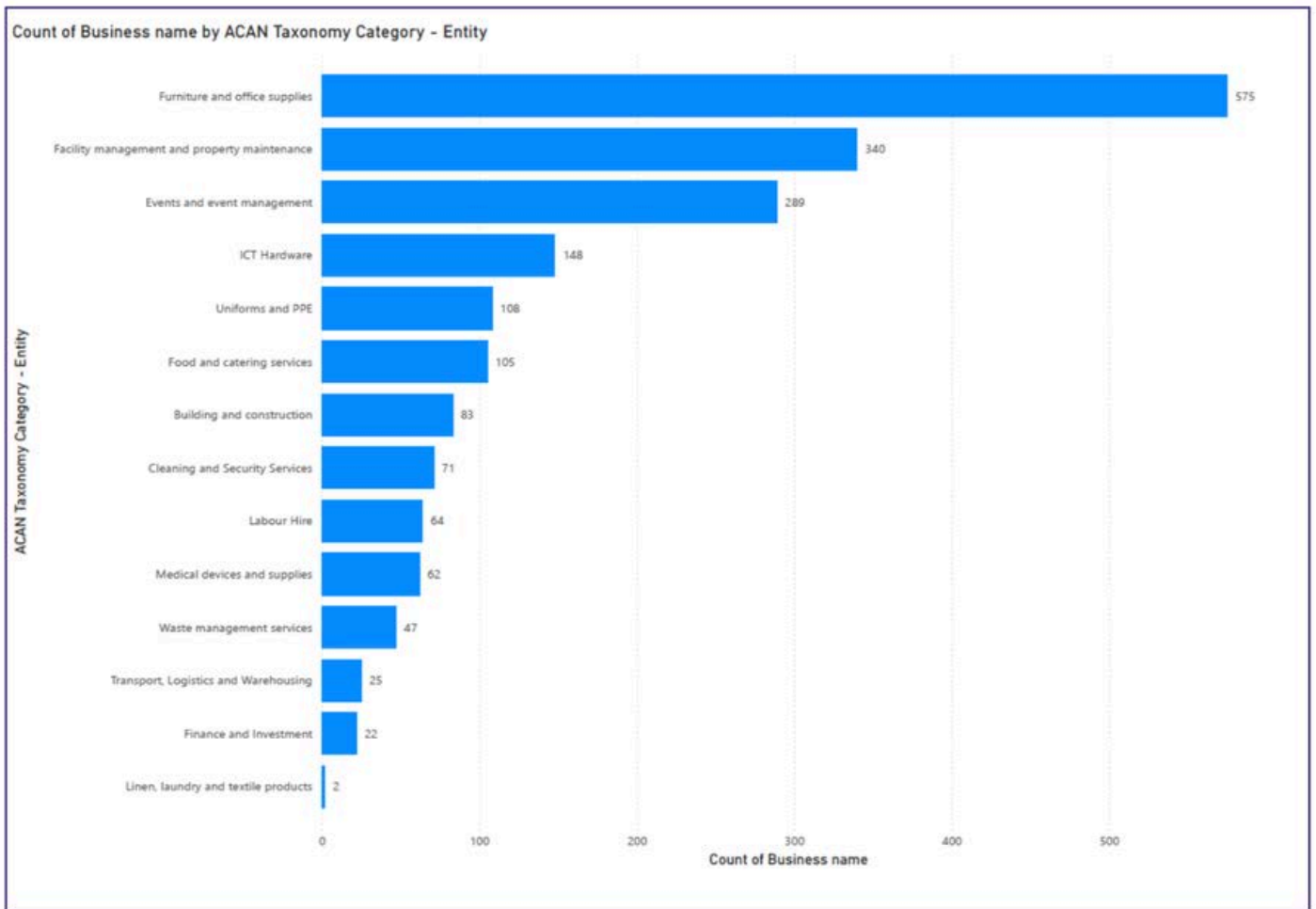


Figure 10: DOBCEL Count of Business name by ACAN Taxonomy Category

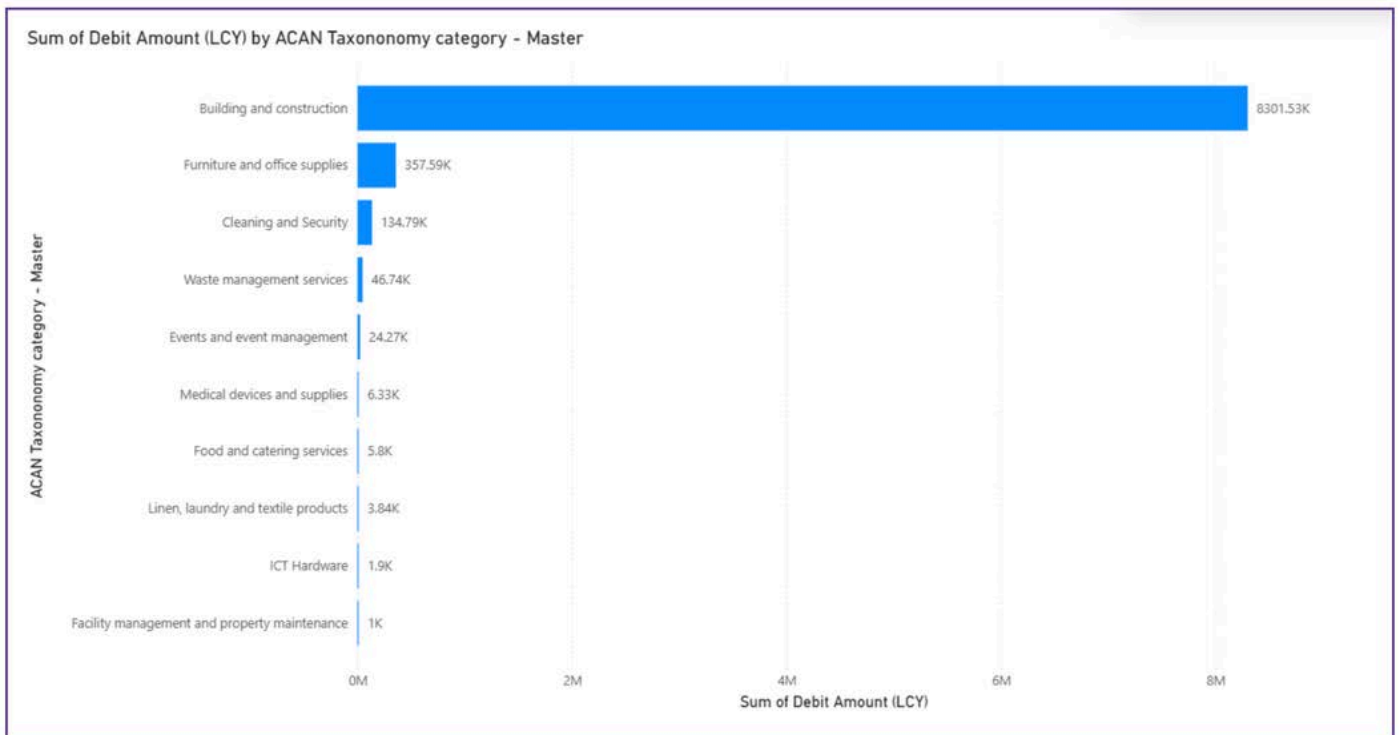


Figure 11: DOBCEL Sum of Debit Amount (LCY) by ACAN Taxonomy Category

Reporting Criteria 4

DOBCEL Modern Slavery achievements in 2025

- **Strategic Alignment:** Launched the DOBCEL Strategy 2035: Pursuing Fullness of Life for All, a 10-year framework that integrates ethical stewardship and social justice into the school system's operations.
- **Staff Professional Learning:** Successfully trained over 760 staff members through professional learning programs focused on the intersection of modern slavery and Laudato Si'.
- **Student Engagement & Advocacy:** Engaged nearly 400 students in specialised workshops regarding ethical procurement and the "Seed of Hope" mission through Laudato Si' Action Planning.
- **Strategic Planning:** Dedicated 109 hours of strategic planning across school communities specifically to address and mitigate modern slavery risks.
- **Capability Building:** Focused on "sense-making" to help school communities understand how their purchasing power serves as a tool against global exploitation.



ACAN Supplier Engagement

The ACAN Program provides supplier engagement support and data, enabling a systematic and comprehensive supply chain risk assessment. In 2025 the ACAN Modern Slavery Risk Management Program launched a new, purpose-built data management platform - ROTA. ROTA centralises the ACAN Risk Management Program framework and facilitates supplier performance evaluation and engagement.



1. Evaluation of the modern slavery risk within operations and supply chains, using the ACAN Risk Taxonomy
2. ACAN Supplier Survey to identify supplier revenue, number of employees, countries of origin for goods sourced overseas, workforce contractual arrangements and Sedex membership status
3. Supplier education on modern slavery and risk management in key areas: cleaning, building and construction, procurement of labour, labour hire and services, sourcing goods from overseas, grievance mechanisms and remediation
4. Onboarding suppliers to Sedex requires a business address, contact details and goods or services provided
5. Sedex Self-Assessment Questionnaire (SAQ) helps suppliers to evaluate their practices against established standards and identify areas for improvement
6. Desktop review to identify key actions required from suppliers
7. Enhance supplier screening using Know Your Client (KYC) intelligence software
8. Corporate Social Compliance Audits provide a point in time, objective and independent verification process of supplier alignment with local laws and worker wellbeing standards
9. Domus 8.7 Index modern slavery statement assessment on selected suppliers in high-risk categories
10. ACAN Prequalified Supplier Directory - a list of preferred suppliers accessible to Catholic organisations.



Sourcing Countries for Tier 1 Suppliers 2025

Suppliers Identified in High Risk Countries

Including Cambodia, China, India, Indonesia, Philippines, Sri Lanka and Turkey

65

Suppliers Identified in Medium Risk Countries

Including Australia, Austria, Colombia, Fiji, France, Germany, Ghana, Hong Kong, Italy, Japan, Malaysia, Netherlands, New Zealand, Singapore, South Africa, Spain, Taiwan, Thailand, United Arab Emirates, United Kingdom and United States

370

Suppliers Identified in Low Risk Countries

Including Denmark and Sweden

4

Figure 12: DOBCEL 2025 Sourcing Countries for Tier 1 Suppliers

Supplier Survey Overview

Estimate of annual revenue in AUD	%GT Count of Australian Business Number or other
\$0 - 5 Million	55.83%
\$5 - 25 Million	20.87%
\$100 - 500 Million	7.44%
\$50K - 500K	7.44%
\$50 - 100 Million	5.18%
\$25 - 50 Million	4.85%
\$1 - 5 Billion	4.69%
\$500K - 1 Million	4.05%
<\$50K	2.59%
\$500 Million - 1 Billion	2.27%
\$+5 Billion	0.65%
\$5 - 25 Million	0.32%

Figure 13: DOBCEL 2025 Supplier Survey Overview - Estimated Annual Revenue

Supplier Survey Overview - Estimated annual revenue

Estimate of annual revenue in AUD	%GT Count of Australian Business Number or other
\$0 - 5 Million	55.83%
\$5 - 25 Million	20.87%
\$100 - 500 Million	7.44%
\$50K - 500K	7.44%
\$50 - 100 Million	5.18%
\$25 - 50 Million	4.85%
\$1 - 5 Billion	4.69%
\$500K - 1 Million	4.05%
<\$50K	2.59%
\$500 Million - 1 Billion	2.27%
\$+5 Billion	0.65%
\$5 - 25 Million	0.32%

Figure 14: DOBCEL 2025 Supplier Survey Overview - Direct and Indirect Staff and / or Employees

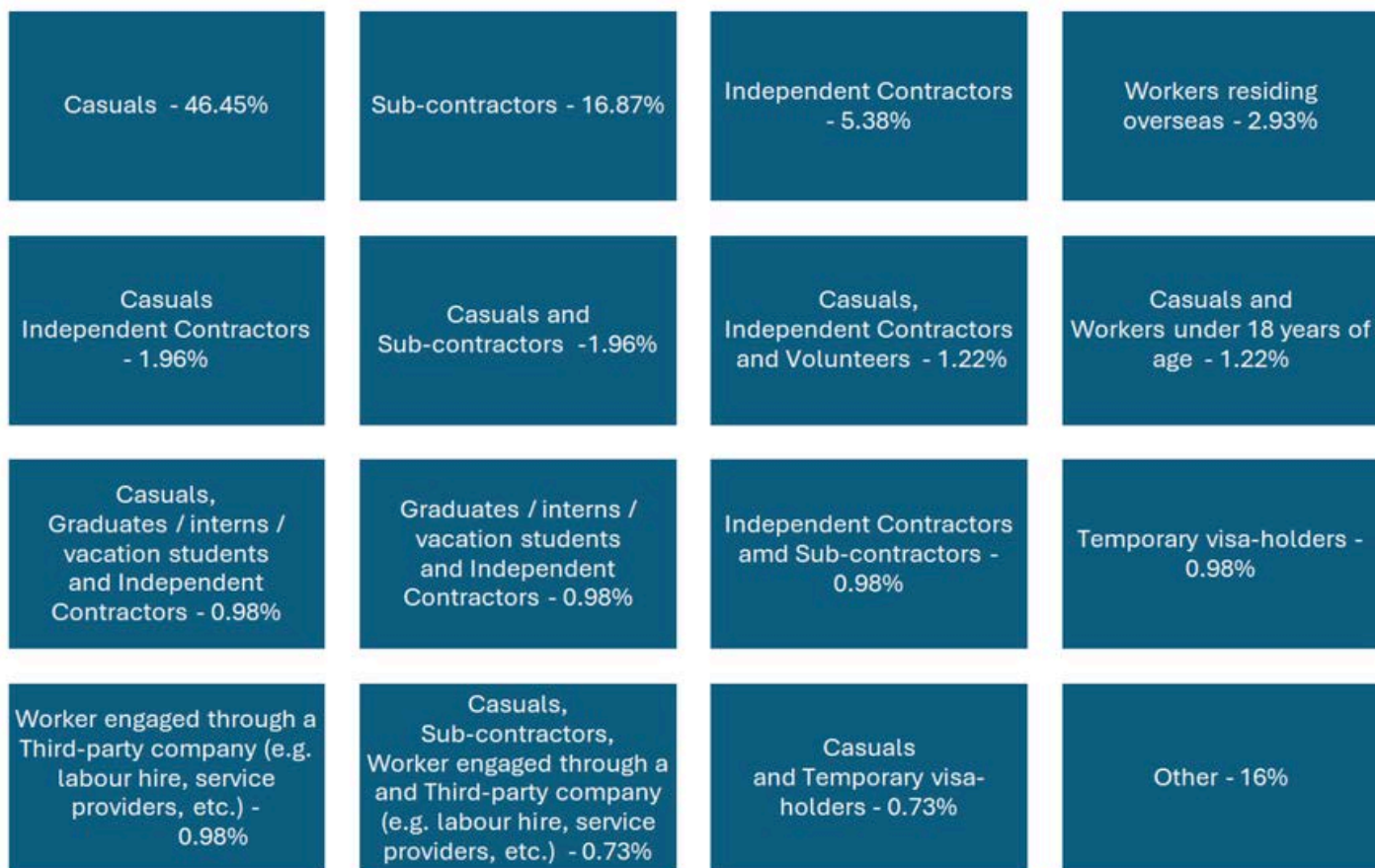


Figure 15: Supplier Contractual Arrangements with Workers

“I came to give life—life in all its fullness”.

John 10: 10



Supplier Workforce Profile Analysis

Based on our 2025 supplier self-assessment data, DOBCEL has gained significant visibility into the workforce size of our supply chain. This data is foundational to our risk mapping, as smaller entities often lack formalised HR oversight, while larger entities typically manage more complex, multi-tiered subcontracting risks.

The majority of DOBCEL's supply chain consists of Small-to-Medium Enterprises (SMEs) and local contractors. Over 70% of our suppliers employ fewer than 50 staff, with the largest single segment being businesses with 11 to 49 employees (29.83%). Additionally, 34.81% of our suppliers are very small operations, consisting of either sole traders (8.47%) or micro-businesses with 1 to 5 employees (26.34%).

At the other end of the spectrum, approximately 15% of our supply chain is comprised of large-scale organisations:

- **Medium-Large Entities:** 8.10% employ 250 or more staff.
- **Major Corporations:** Approximately 5% are large-scale employers with over 1,000 staff, including a subset of 2.21% that manage a workforce exceeding 5,000 employees.



Modern Slavery Implication

This profile confirms that a significant portion of DOBCEL's procurement spend directly supports the local regional economy through small businesses. From a risk perspective, this allows for more direct engagement with business owners; however, it also highlights the strategic importance of our "Sense-Making" and formation sessions. We recognise that these smaller suppliers may require additional support and resources from DOBCEL to align with the requirements of the Modern Slavery Act 2018.

Actions Taken to Assess and Address Risk

Digital Transformation: Transition to Business Central

A cornerstone of our 2025 operational strategy was the system-wide transition to Microsoft Dynamics 365 Business Central. This digital transformation has significantly matured our capacity to manage modern slavery risks by:

- **Centralising Data:** Consolidating financial and supplier data from across all 57 schools into a single, transparent "source of truth."
- **Automating Oversight:** Enabling real-time monitoring of supplier spend and ensuring engagements are validated against established Preferred Supplier Agreements.
- **Enhancing Reporting:** Providing the specific data necessary to track high-risk spend categories and verify that vendors are screened according to our ethical procurement values.



Governance and Procurement Controls

To mitigate risks at the point of engagement, we operate under a rigorous financial delegation framework. All high-cost engagements are subject to tiered approval thresholds:

- **Quotes & Tenders:** Expenditures exceeding \$15,000 require a minimum of three written quotes. Non-capital contracts over \$50,000 and capital works over \$100,000 necessitate a formal public tender process to ensure supplier transparency.
- **Preferred Supplier Agreements:** We are currently establishing a list of authorised cleaning contractors under formal Preferred Supplier Agreements. To be eligible for engagement, each provider must first complete the ACAN Supplier Self-Assessment.
- **Cleaning Services Oversight:** While schools manage day-to-day cleaning operations, DOBCEL governs the overarching policy framework. Procurement follows a formal process requiring approved purchase orders and a valid preferred supplier list for recurring services. Cleaning personnel are either hired directly through DOBCEL payroll or sourced via vetted external contractors. All providers must comply with the mandatory Child Safe Standards (Ministerial Order 1359) and DOBCEL's ethical sourcing criteria.

System-Wide Capacity Building and Formation

During the 2025 reporting period, DOBCEL prioritised internal capability building as the human foundation of our risk mitigation strategy. Central to this was an extensive school engagement program, through which 29 schools across the Diocese participated in targeted formation.

- **Mission-Led Training:** Utilising the framework of *Laudato Si'* and integral ecology, DOBCEL delivered 138.5 hours of direct formation to 763 staff members, including school leadership, finance teams, and business managers. These sessions framed sourcing decisions as moral acts—a "response to the cry of the poor."
- **Technical Specialisation:** To supplement internal mission-based formation, DOBCEL leveraged its membership with the Australian Catholic Anti-Slavery Network (ACAN) to provide staff with technical training. This included participation in high-risk sector webinars covering Building and Construction, Contracted Labour, and Cleaning and Security.





Strategic Focus: "Sense-Making"

For the 2025 calendar year, DOBCEL's primary strategic goal is "sense-making", a collaborative process with school communities to baseline current ethical sourcing and due diligence practices. This ensures our modern slavery response remains deeply aligned with the DOBCEL Strategy 2035 and our commitment to sustainable stewardship.

Strategic Planning and Operational Integration

To ensure that modern slavery due diligence is embedded in day-to-day operations, DOBCEL focused on the following structural actions:

- **Operational Leadership:** School leadership teams dedicated 109 hours to strategic planning and planning meetings across the diocese. This resulted in the formal incorporation of modern slavery considerations into localised school improvement plans and business manager workflows.
- **Student Advocacy:** DOBCEL engaged with 384 students through 20 hours of workshops. These sessions focused on ethical consumerism, empowering students to understand the impact of global supply chains and reducing the demand for exploited labour.



Policy Framework and Supplier Engagement

DOBCEL is formalising its commitment to human rights through the implementation of robust policy controls:

- **Anti-Modern Slavery Policy:** In 2025, we launched DOBCEL's first standalone Modern Slavery Policy. This was communicated to all staff and discussed during the Q1 supplier onboarding meetings to ensure total system alignment.
- **Procurement Reform:** DOBCEL has initiated a review of its procurement policy and supplier engagement framework to proactively mitigate modern slavery risks.
- **Supplier Code of Conduct:** Operating within Victoria, DOBCEL aligns its procurement framework with the overarching Victorian Government Supplier Code of Conduct, which outlines mandatory minimum standards regarding ethics, corporate governance, environmental management, and human rights. Compliance is verified through the ACAN Pre-Qualified Directory registration process, where high-risk and tier-one suppliers complete a specialised supplier survey and submit Sedex Self-Assessment Questionnaires (SAQs) to track human rights standards.

"God is the love and freedom that is given
in interpersonal relationships, and every human being
is a free person destined to live for the good of others
in equality and fraternity."

Pope Francis - Declaration on
International Day for the
Abolition of Slavery,
Dec. 2, 2014



Domus 8.7



DOBCEL is a founding member of Domus 8.7. Domus 8.7 was established as an agency of the Catholic Archdiocese of Sydney in 2020 as a key element of the ACAN Modern Slavery Risk Management Program. This collaborative approach to remediation is aligned with the Modern Slavery Act and Catholic Social Teaching, which are centered on the needs, wellbeing and empowerment of people impacted.

Domus 8.7 provides DOBCEL:

- resources that enable us to listen to workers (grievance channel)
- a 24/7 careline for workers on our sites, staffed by professional counsellors
- direct support to people impacted by modern slavery
- guidance and technical assistance to prevent, identify and remediate modern slavery
- a documented process to assess if an organisation has caused, contributed or is directly linked to modern slavery and modern slavery indicators

Domus 8.7 empowers people impacted by modern slavery to have choice and control over what forms of remediation are meaningful to them and to engage safely with business/supply chain actors. Supports may include:

- modern slavery indicator assessment
- needs assessment, case coordination, response and remediation planning
- referrals to community, social services, unions
- transport, accommodation, financial and food support
- legal support, referrals, accompaniment and advocacy
- job training, retraining and redeployment
- accompaniment and advocacy to engage with government and law enforcement agencies
- opportunities to contribute lived expertise to improve modern slavery responses.

The Domus 8.7 Advisory Committee Members also include a person with lived expertise, Mr Moe Turaga. Domus 8.7 is a registered charity with the Australian Charities and Not-for profits Commission (ACNC) and is an endorsed Public Benevolent Institution with Deductible Gift Recipient (DGR) status. ABN 244 72497189

"In 2025, no one should be living or working in modern slavery. When I look at this strategic plan, I do not see just words on paper. I see lives – lives like mine, lives of people who have been silenced, and lives of those who are still waiting to be heard."

— Moe Turaga, Slavery Survivor and ACAN Program Team Member
(The Australian Anti-Slavery Commissioner's Strategic Plan for 2025-2028 launch, 22 October 2025)



Reporting Criteria 5

Assessing the Effectiveness of Actions Taken By DOBCEL

Continuous Improvement and Future Commitments

DOBCEL is committed to the ongoing maturation of our modern slavery response, moving beyond foundational awareness toward a culture of proactive stewardship. Following the "sense-making" phase of 2025, our focus for the 2026 reporting period will center on increasing the depth of our supply chain discovery. Specifically, we aim to transition a higher volume of our 1,902 high-risk suppliers from self-assessment to active verification through expanded social auditing and Sedex engagement. By refining our Supplier Risk Taxonomy and leveraging our partnership with ACAN, we will continue to enhance the data integrity of our procurement processes, ensuring that every dollar of our \$338.6 million consolidated revenue supports the dignity of work.

Furthermore, we will continue to embed ethical sourcing into the DOBCEL Strategy 2035 by developing measurable performance indicators for our school communities. This includes expanding our staff formation programs to reach the remaining school leadership teams, and formalising a Social Justice Procurement Framework that prioritises vendors with transparent labour practices. Through these actions, DOBCEL will ensure that our commitment to *Laudato Si'* remains an active, lived reality, fostering a supply chain that is not only commercially sound but fundamentally aligned with our Catholic mission and human rights obligations.

Measuring Effectiveness (Performance Data)

Quantitative Impact and System Scaling

The 2025 reporting period marked a significant expansion in DOBCEL's supply chain visibility and internal engagement. Internal staff dedication to modern slavery activities more than doubled to 188 hours, while our managed supplier database grew from 519 to 8,420 entities, representing full system-wide integration. This data-driven approach allowed DOBCEL to identify 1,902 suppliers within high-risk categories, with 1,348 cumulative ACAN Supplier Surveys completed to date. By scaling our Sedex engagement—inviting 180 suppliers and overseeing the completion of 32 Self-Assessment Questionnaires (SAQs)—we have moved beyond basic awareness into a mature phase of supply chain discovery and rigorous data integrity.



Verification, Accountability, and Strategic Alignment

A key milestone in our 2025 "Sense-Making" phase was the transition from passive monitoring to active verification. This was evidenced by the completion of our first social audit and the identification of six non-conformances, allowing DOBCEL to initiate corrective actions and engage directly with suppliers on labour standards. These actions are deeply rooted in the DOBCEL Strategy 2035, leveraging the framework of Laudato Si' to ensure our \$338.6 million consolidated revenue is managed with sustainable stewardship. Through continued partnership with ACAN and the ongoing refinement of our Supplier Code of Conduct, we remain committed to fostering a culture of accountability that protects the dignity of all workers within our regional and global supply chains.

DOBCEL Actions for 2026:

1. Supplier Desktop review and action planning to address risk identified in 2025
2. Deploy ACAN Staff Awareness at an organisational level, and develop a plan to build internal capacity
3. Develop a Survey tool for Schools to gather school specific information, in relation to Modern Slavery Risk Management
4. Demonstrate continuous improvement by completing the Sedex Self Assessment questionnaire and develop an action plan based on the risk management scores.



DOBCEL Supplier Engagement Overview

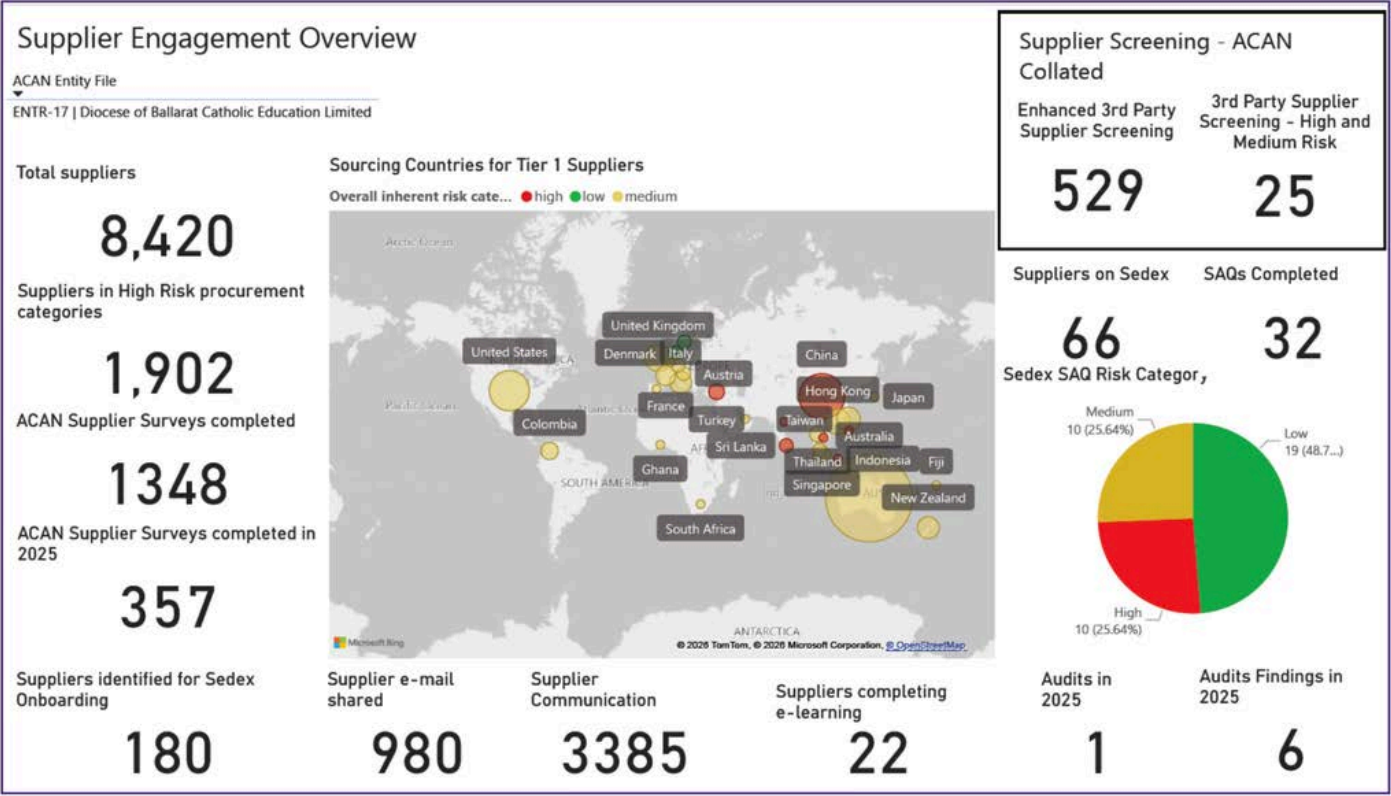


Figure 17: DOBCEL's 2025 Supplier Engagement Overview



"The rich and the poor have equal dignity, for 'the Lord is the maker of them all'."

Pope Francis, Laudato Si' #94



DOBCEL Baseline Data

DOBCEL tracks key performance indicators (KPIs) to evaluate the effectiveness of our modern slavery response. The 2025 reporting period saw a significant expansion in supply chain visibility and staff engagement.

DOBCEL	Activity	2024	2025
Internal Staff	Hours spent on modern slavery activities	80	108
	Individual staff completed e-learning	1	12
	E-Learning modules completed	1	12
External / Supplier Engagement	Total number of suppliers	519	8420
	Total number of suppliers with visible contact information and ABN	53	980
	Number of suppliers with visible contact information	117	1902
	Number of suppliers across high-risk categories	56	1348
	Number of ACAN Supplier Surveys completed	10	22
	Supplier staff attending capacity building webinars	15	180
	Invited to join Sedex	15	180
	Joined Sedex	20	66
	Sedex SAQ completed	9	32
	Social audits	-	1
	Corrective actions	0	6
DOMUS 8.7 External Referrals	Contacts made via worker voice / grievance mechanism	0	0
	Referrals for advice and assistance	0	0
	Individuals identified or referred for modern slavery assessment	0	0
	Individuals with modern slavery cases remediated	0	0

Figure 18: DOBCEL's Engagement Data 2025

Reporting Criteria 6

Consultation with Entities Owned or Controlled

This statement is provided as a single reporting entity in accordance with section 13 of the Modern Slavery Act 2018 (Cth). It covers the activities and operations of the 57 schools governed by Diocese of Ballarat Catholic Education Limited (DOBCEL) and includes all centralised administrative functions.

In preparing this statement, the DOBCEL Modern Slavery Liaison Officer consulted with relevant functional teams across the organisation, including Policy, Risk & Assurance, Finance, Infrastructure, and People and Development, as well as the Australian Catholic Anti-Slavery Network (ACAN). This collaborative approach ensured that our risk assessment and performance data accurately reflect the operational reality of our regional school communities.

This consultation has informed DOBCEL's approach to modern slavery risk management, ensuring the statement is appropriately tailored to our specific structure and regional risk profile. Ongoing engagement with both internal stakeholders and the ACAN network will remain a central component of our continuous improvement strategy, supporting future initiatives and the maturation of our reporting.

"The glory of God is the human person fully alive".

St. Irenaeus of Lyons



“We must be intentional about this, not regarding anti-slavery as a tick-a-box exercise in minimalist compliance but as a defining commitment without which we could not in conscience engage in our many activities; not as something only to trouble the business manager or mission officer, but as everyone’s concern. Pope Francis reminds us that the anti-slavery challenge demands patience, perseverance, and courage from each one of us.”

Anthony Fisher OP, Archbishop of Sydney, 2023



DIOCESE
OF
BALLARAT
CATHOLIC
EDUCATION
LIMITED



DOBCEL

2025 Modern Slavery Statement

Disclosure Note

This statement has been made on behalf of Diocese of Sale Catholic Education Limited (DOSCEL) ABN 91 621 266 993 and all entities owned and controlled by DOSCEL. This statement is prepared pursuant to section 13 of the Modern Slavery Act 2018 (Cth) and covers DOSCEL as a single reporting entity.

Approval and Signature

This Modern Slavery Statement was approved by the principal governing body of DOSCEL as defined by the Modern Slavery Act 2018 (Cth) ("the Act") on 19 June 2026.



Cathy Jenkins
Board Deputy Chair
Diocese of Sale Catholic Education Limited

Head Office

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Dear Sisters and Brothers in Christ,

In this 2025 reporting period, the Diocese of Sale Catholic Education Limited (DOSCEL) has continued its commitment to confronting the profound and evolving reality of modern slavery. In his first encyclical *Magnifica Humanitas* (15 May 2026), Pope Leo XIV reminds us that modern slavery today is often hidden within the very systems that sustain contemporary life, noting that “*new forms of slavery... directly linked to the digital economy*” are embedded in global supply chains that can obscure exploitation.

This insight challenges us to examine closely not only overt practices, but also the structures, relationships and decisions that shape our work. As a Catholic education community, we recognise that any system which treats the human person as a commodity stands in direct contradiction to the dignity bestowed by God. Pope Leo XIV insists that “*human trafficking must be recognized as a contemporary form of slavery and a grave violation of human dignity*” (Leo XIV 15/5/26), a call that sharpens our moral responsibility in every aspect of diocesan life.

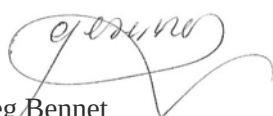
Throughout the 2025 calendar year, DOSCEL has made deliberate progress in identifying, assessing and addressing modern slavery risks across our operations and supply chains. This has included strengthening procurement processes, increasing due diligence practices, and embedding ethical considerations into decision making. Consistent with the Holy Father’s affirmation that the fight against modern slavery is a “*decisive test for ethical discernment*” (Leo XIV, 15/5/26), we have sought not only compliance but genuine conversion in practice and culture.

We are increasingly attentive to the hidden dimensions of exploitation—whether in the production of goods, the provision of services, or the digital systems we rely upon. As Pope Leo XIV warns, we cannot celebrate innovation “*if they are built on a chain of exploitation that remains deliberately hidden*” (Leo XIV, 15/5/26). This awareness calls us to deeper scrutiny, transparency, and accountability in all that we do.

In the Diocese of Sale, our commitment is grounded in the Gospel and expressed through Catholic Social Teaching: the dignity of the human person, the common good, solidarity, and the preferential option for the poor. We recognise that eliminating modern slavery requires more than avoiding harm—it demands active participation in building just systems that uphold the dignity of every person.

While important progress has been made, this work remains ongoing as we seek to respond with humility, courage and integrity. Together, as a diocesan education community, we remain committed to ensuring that our schools, systems and partnerships reflect the dignity of every human person and contribute to a world where exploitation has no place.

Yours in Christ,

+ 

+Greg Bennet
Bishop of Sale

Criteria 1: About us

Diocese of Sale Catholic Education Limited owns and operates all Catholic primary and secondary schools within the Diocese of Sale, excluding Catholic College Sale Ltd and Lavalla Catholic College, Traralgon.

Diocese of Sale Catholic Education Limited, ('**DOSCEL**'), ABN 91 621 266 993, was established in 2018. DOSCEL has been registered with the Australian Charities and Not-for-profits Commission ('**ACNC**') since 2017.

The DOSCEL company objects are to carry on and promote the charitable activities of the Diocese of Sale in connection with education and in particular:

- a) to support and advance Catholic education;
 - b) to govern and manage the operation of the Catholic primary schools and secondary
 - c) schools within the Diocese of Sale; and
 - d) to provide support, services and leadership to those schools;
- operating as part of the mission of the Catholic Church in conformity with canon law.

Nurturing Faith, Inspiring Learning: The Mission of Catholic Education

Our mission in Catholic education is to deliver sustainable and inclusive education that nurtures each student's potential, equips them to thrive in a dynamic world, and is enriched by our flourishing Catholic culture. The mission of DOSCEL is deeply aligned with the evangelising mission of the Church, primarily realised through our network of Catholic schools.

At the heart of our educational approach lies a commitment to holistic development, encompassing spiritual, academic, social, emotional, and physical growth. Our curriculum prioritises faith formation, immersing students in Catholic teachings and values. We actively promote Catholic Social Teaching, instilling in our students a dedication to social justice, global citizenship, and service to others.

Furthermore, we embrace the integration of technology into our classrooms, equipping students with the digital skills essential for success in the modern world. Our teaching methods are tailored to cater to diverse learning styles, abilities, and interests, ensuring that every student receives personalised support, academically and personally. Collaboration with parish priests, teachers, staff, and families remains fundamental to our mission of holistic student development.

Under the leadership of Most Rev Greg Bennet, Bishop of Sale, and with the support of the Office, parish communities, and the wider faith community, DOSCEL launched the Strategic Plan 2025-2028. This Strategic Plan outlined our key priorities and direction for the next four years and will guide our efforts to provide high-quality education that nurtures both faith and academic excellence.

In February 2025 we were excited by the opening of St Josephine Bakhita Catholic Primary School, located in the Five Farms estate at Wild Goose Way, Clyde North. This addition to our network of schools reflects our dedication to meeting the educational needs of the

community while fostering faith-filled environments that empower families and young people. St Josephine Bakhita Catholic Primary School now serves as a beacon of faith and learning, shaping the lives of current students and generations to come. Additionally, by naming the school after the patron Saint dedicated to modern slavery victims, we strive to raise awareness and inspire action against modern slavery within our community.

Criteria 2: Organisational structure, operations and supply chain

Our structure and operations

DOSCEL governs 39 Catholic primary schools, five of the seven Catholic secondary schools and the DOSCEL Office in the Diocese of Sale (Figure 1). **Appendix 1** shows the complete list of entities owned and operated by DOSCEL. Catholic College Sale Ltd is governed by a College Board on behalf of the Members, the Marist Provincial and the Bishop of Sale, and Lavalla Catholic College, Traralgon is governed by Marist Schools Australia, and are therefore not covered by this Statement.

In the calendar year from 1 January to 31 December 2025, DOSCEL's annual consolidated revenue reached \$440.89 million, with employee-related expenses totalling \$288.67million. During this period, DOSCEL schools educated 10,903 primary school students and 7,432 secondary students. Additionally, DOSCEL employed a workforce comprising approximately 3,200 school staff and 105 Office staff.

Figure 1: Location of DOSCEL schools in the Diocese of Sale

The Executive Director is supported by the DOSCEL Office, working closely with schools to provide high-quality educational opportunities. Being Christ-centred communities, DOSCEL schools are vibrant, unified communities where faith, collaboration and excellence are at the heart of all endeavours. This is seen in the growth and achievements of students and reflected in an unwavering commitment to integrity and inclusion. Together DOSCEL schools create an environment where each student is empowered to thrive, reflecting collective efforts inspire hope and transformation in the world.

In 2025, a review was undertaken on the DOSCEL Executive Leadership Team (**ELT**) structure, and the revised ELT consisted of:

- Executive Director
- Deputy Executive Director
- Chief Learning and Teaching Officer
- Chief Catholic Identity and Mission Officer
- Chief Leadership and Registration Officer
- Chief Financial Officer
- Chief People Officer
- Chief Planning and Infrastructure Officer
- Chief Technology Officer
- Chief Governance Officer.

There was no change to the Board directors in 2025 with the DOSCEL Board, including the Chair and Deputy Chair, being comprised of eight Directors. The Board oversees corporate governance, regulatory compliance, Church law and risk management, and sets the strategic direction, as is evidenced through the launch of the 2025 – 2028 Strategic Plan. A Directors' Code of Conduct is in place.

Four Committees enhance the Board's decision-making capacity:

- Catholic Identity, Leadership, Learning and Teaching
- Finance, Audit and Risk
- Planning, Building and Financing
- Culture, Ethics and Conduct.

DOSCEL's Risk Management Framework is presented and reviewed at each Finance, Audit and Risk Committee and DOSCEL Board meetings. A Delegations Policy and Register are in place, updated with Committee and Board approval.

Victorian Catholic Education Authority Ltd ('**VCEA**') represents Catholic education providers in Victoria, advocating for students' needs and managing government funding. The Bishop of Sale is a member of VCEA. A Memorandum of Understanding was entered into in 2025 between VCEA and DOSCEL to reflect the framework for collaboration and continued partnership and to inform how DOSCEL and VCEA cooperate in the fulfilment of their shared and separate responsibilities to advance the mission of Catholic education in the State of Victoria.

The Victorian Registration and Qualifications Authority ('**VRQA**') is responsible for regulating education and training in Victoria, with DOSCEL's relationship maintained through VCEA, the peak body for Catholic school education.

VCEA, as the VRQA appointed review body for Catholic schools in Victoria, is responsible for assuring the compliance of proprietors and their schools with the minimum standards for school registration. In line with this responsibility, VCEA undertook a governance and not-for-profit minimum standards for school registration review of DOSCEL in 2024. The actions recommended for rectification by VCEA were undertaken by DOSCEL throughout 2025.

Figure 2 illustrates the DOSCEL governance structure in 2025.

Figure 2: 2025 DOSCEL Governance Structure

Our modern slavery governance framework

DOSCEL is a member of the Australian Catholic Anti-Slavery Network (**ACAN**). This includes access to ACAN's Modern Slavery Risk Management Program tools, resources and specialist experts. The Chief Financial Officer (**CFO**) acts as DOSCEL's Modern Slavery Liaison Officer to coordinate anti-slavery actions and reporting across DOSCEL. The CFO presents the annual DOSCEL Modern Slavery Statement, endorsed by the Executive Director, to the DOSCEL Board via the Finance, Audit & Risk Committee.

Our supply chain

During the 2025 calendar year, DOSCEL spent approximately \$142.6 million with external suppliers. Our top 50 spend equated to approximately \$82.75 million and comprised 58% of our total spend to external suppliers. Our largest procurement categories were Building and Construction, ICT Hardware / ICT Software and Network Services, Facility management and property maintenance and Labour Hire (largely related to the sourcing of casual relief teachers).

An internal audit of supplier data for the 2025 calendar year indicated that DOSCEL had 7,112 suppliers for the period, ranging from one-off purchases to longer-term contracts. This is an increase from our 6,789 suppliers in 2024.

We acknowledge the trend towards sustainable procurement involving supply chain consolidation. DOSCEL is currently in the early stages of mapping our supply chain and we are committed to gaining greater transparency of our existing suppliers. Furthermore, a new enterprise system will underpin procurement activities in the future. The leveraging of emerging technologies to enhance operational efficiency across DOSCEL is a key strategic priority of the Strategic Plan 2025-2028.

Criteria 3: Modern slavery risks in our operations and supply chain

As a primary and secondary education provider, DOSCEL has no risk of modern slavery occurring within its directly employed workforce. Employment is overseen by DOSCEL's People and Culture Department, ensuring all staff are engaged through fair, transparent, and ethical practices. The vast majority of employees are engaged under the *DOSCEL Schools and Secretariat Agreement 2022*.

DOSCEL takes a proactive stance on identifying and mitigating modern slavery risks, particularly among suppliers in labour-intensive sectors such as school cleaning, facilities management and construction. These industries often employ individuals who may be more vulnerable to exploitation, including migrants, temporary visa holders, international students, and undocumented workers. Subcontracting arrangements in these sectors can sometimes result in noncompliance with workplace rights and entitlements.

To strengthen protections against modern slavery, DOSCEL requires all labour suppliers to hold a valid labour hire license, ensuring they comply with industry regulations and ethical employment standards. This requirement forms part of DOSCEL's broader commitment to responsible supplier management and upholding fair workplace practices.

Risk Assessment

DOSCEL uses the ACAN Category Risk Taxonomy, a classification standard that identifies severity of actual or potential harm to people (saliency) in spend categories.

The ACAN Category Risk Taxonomy is based on sources such as:

- the Global Slavery Index
- the International Labor Organisation, including definitions of modern slavery

- the Bureau of International Labor Affairs, U.S Department of Labor
- the Global Child Forum and UNICEF.

Four key factors are also used to determine the level of risk:

- **Geography:** the country or location where a good is made or service is delivered
- **Industry:** the sector in which the making of goods or delivery of service occurred
- **Commodity:** the raw materials or components that comprise the goods or products
- **Workforce vulnerability:** such as bonded visas, temporary migrants, women or children known to be employed in specific industry sectors

Domus 8.7: trends, cases, and risk intelligence identified through the Domus 8.7 remediation service, including grievances and remediation insights relevant to category and risk to workers.

High Risk	Medium Risk	Low Risk
• Building and construction • Cleaning and Security • Events and event management • Facility management and property maintenance • Finance and Investment • Food and catering services • Furniture and office supplies • ICT Hardware • ICT Software and network services - offshore • Labour Hire • Linen, laundry and textile products • Medical devices and supplies • Transport, logistic and warehousing • Uniforms and PPE • Waste management services	• Advertising & Marketing • ICT Software and network services - onshore • Utilities • Fleet management, consumables and maintenance • Travel and accommodation • Print / Mail Provider	• Professional services • Financial expenses • Government and agency fees • License / membership fees

Spend Data Analysis

During the 2025 reporting period, DOSCEL engaged with 7,112 third-party suppliers for goods and services, with total expenditure reaching \$142.6 million. This figure does not include payroll-related payments and intra-company transactions.

Consistent with previous years, the analysis highlights that a significant portion of DOSCEL's spending is directed toward industries traditionally associated with heightened modern slavery risks. These sectors include building and construction, ICT hardware, furniture and office supplies, cleaning and security. Many of the equipment and consumables used in these industries are manufactured overseas, often in high-risk regions such as China and Vietnam, where labour exploitation is more prevalent.

DOSCEL remains committed to monitoring and mitigating these risks through responsible procurement practices and supplier oversight.

In the above graphs DOSCEL's total spend by risk category, number of suppliers and spend in high risk categories, as determined by the ACAN risk taxonomy, are shown.

Criteria 4: Actions taken to assess and address risks

In response to the evolving modern slavery policy landscape, DOSCEL continued to enhance its performance in addressing modern slavery risks within its operations and supply chain throughout 2025.

A Key Program outlined in the Strategic Plan is the development of a new Procurement Framework with the outcome that “DOSCEL engages in ethical, sustainable and strategic sourcing practices”. The success measures of this Key Program are:

- DOSCEL operates within the established Procurement Framework supporting and promoting sustainable and ethical supply chains.
- DOSCEL Modern Slavery Statements evidence substantial annual improvement in procurement activities.

ACAN Supplier Engagement

The ACAN Program provides supplier engagement support and data, enabling a systematic and comprehensive supply chain risk assessment. In 2025 the ACAN Modern Slavery Risk Management Program launched a new purpose-built data management

platform - ROTA. ROTA centralises the ACAN Risk Management Program framework and facilitates supplier performance evaluation and engagement through:

1. Evaluation of the modern slavery risk within operations and supply chains, using the ACAN Risk Taxonomy.
2. ACAN Supplier Survey to identify supplier revenue, number of employees, countries of origin for goods sourced overseas, workforce contractual arrangements and Sedex membership status.
3. Supplier education on modern slavery and risk management in key areas: cleaning, building and construction, procurement of labour, labour hire and services, sourcing goods from overseas, grievance mechanisms and remediation.
4. Onboarding suppliers to Sedex requires a business address, contact details and goods or services provided.
5. Sedex Self-Assessment Questionnaire (SAQ) helps suppliers to evaluate their practices against established standards and identify areas for improvement.
6. Desktop review to identify key actions required from suppliers.
7. Enhance supplier screening using Know Your Client (KYC) intelligence software.
8. Corporate Social Compliance Audits provide a point in time, objective and independent verification process of supplier alignment with local laws and worker wellbeing standards.
9. Domus 8.7 Index modern slavery statement assessment on selected suppliers in high-risk categories.
10. ACAN Prequalified Supplier Directory - a list of preferred suppliers accessible to Catholic organisations

The results of this engagement are presented below alongside aggregated ACAN engagement data.

Figure 3: 2025 DOSCEL Supplier Engagement Overview

DOSCEL's flagship modern slavery project in 2024 was the planning, construction and procurement of St Josephine Bakhita Catholic Primary School in Clyde North, named after the patron saint of victims of modern slavery. DOSCEL aspired to exemplary modern slavery practice in all aspects of this project. These uplifted practices were then carried through into 2025 with the planning and construction of two new schools—St Oscar Romero Catholic Primary School Drouin, and St Carlo Acutis Catholic Primary School Clyde—as well as the redevelopment of the Sion site in Sale, with all three projects scheduled to open in 2027. These practices are now embedded across all DOSCEL capital projects.

For high risk spend categories, DOSCEL continued to supplement its due diligence activities with further checks such as reviewing websites, checking whether a voluntary or mandatory Modern Slavery Statement has been made publicly available and considering any available media coverage and its credibility. All new suppliers undergo the vetting process for modern slavery risks prior to entering into service agreements.

We recognise that whilst reviewing publicly available information can provide some insights, it may not reveal the full extent of a supplier's operations or potential issues.

Service Agreements

All DOSCEL Service Agreements include modern slavery clauses, irrespective of the monetary value of the services provided. While this minimum standard was maintained from previous years, DOSCEL adopted a more proactive approach in 2025, as evidenced by the case studies below.

Case Study 1: Responding to concerns raised in third-party licence arrangements

As part of DOSCEL's human rights due diligence, modern slavery clauses are included in service agreements with third parties. In early 2025, a school principal raised concerns about an organisation operating across multiple DOSCEL sites, including allegations of irregular wage payments and delayed superannuation contributions.

The concerns indicated potential non-compliance with workplace obligations and possible worker vulnerability. This was the first matter of this kind raised in relation to a current provider and required proactive intervention by DOSCEL, with a focus on securing appropriate outcomes for affected workers.

DOSCEL responded promptly by seeking a formal response from the organisation, highlighting the potential breach of contractual obligations and making enquiries about the treatment of workers across the affected sites. When the concerns were not adequately addressed, DOSCEL determined that the organisation had breached its contractual obligations and terminated the contract.

DOSCEL then worked with the relevant regulator, school principals and a replacement provider to support an orderly transition and minimise disruption to students and families. This approach helped ensure affected workers' entitlements were brought up to date and that the majority subsequently secured employment with the replacement provider. This case demonstrates DOSCEL's focus on both contractual compliance and practical remediation outcomes for workers.

Case Study 2: Proactive review of labour hire licence compliance

During the 2025 reporting period, DOSCEL undertook a proactive review of labour hire licence compliance across labour suppliers engaged under DOSCEL service agreements. This included checking provider details against the Victorian Labour Hire Authority register and following up with suppliers where a licence had expired after the commencement of the DOSCEL service agreement.

This review was undertaken because labour-intensive services such as cleaning are recognised as presenting heightened risks of worker vulnerability and exploitation, and DOSCEL requires labour suppliers to hold valid labour hire licences as part of its responsible supplier management practices.

In one instance involving a cleaning contractor engaged at a DOSCEL school, initial communications did not result in the provider renewing its labour hire licence. DOSCEL then escalated the matter and took legal steps to terminate the contract unless a current licence was obtained. This action resulted in the contractor renewing the required licence. This case demonstrates that DOSCEL does not rely solely on contractual requirements at the point of engagement but actively monitors ongoing compliance and is prepared to take proportionate enforcement action where necessary to address modern slavery-related risk indicators.

Remediation

DOSCEL's Whistleblower Policy provides a confidential, protected channel for staff, contractors or community members to raise concerns about a range of conduct including modern slavery that can be reported safely and escalated for appropriate investigation and response. The policy is publicly available on DOSCEL's website.

DOSCEL is a member of Domus 8.7, a key element of the ACAN Modern Slavery Risk Management Program. Domus 8.7 provides DOSCEL:

- resources that enable us to listen to workers (grievance channel).
- a 24/7 careline for workers on our sites, staffed by professional counsellors.
- direct support to people impacted by modern slavery.
- guidance and technical assistance to prevent, identify and remediate modern slavery.
- a documented process to assess if an organisation has caused, contributed or is directly linked to modern slavery and modern slavery indicators.

Domus 8.7 empowers people impacted by modern slavery to have choice and control over what forms of remediation are meaningful to them and to engage safely with business/supply chain actors. Supports may include:

- modern slavery indicator assessment.
- needs assessment, case coordination, response and remediation planning.
- referrals to community, social services, unions.
- transport, accommodation, financial and food support.
- legal support, referrals, accompaniment and advocacy.
- job training, retraining and redeployment.
- accompaniment and advocacy to engage with government and law enforcement agencies.
- opportunities to contribute lived expertise to improve modern slavery responses.

The Domus 8.7 Advisory Committee Members also include a person with lived expertise. Domus 8.7 is a registered charity with the Australian Charities and Not-for profits Commission (ACNC) and is an endorsed Public Benevolent Institution with Deductible Gift Recipient (DGR) status ABN 244 72497189.

Criteria 5: Assessing the effectiveness of actions taken by us

Continuous Improvement

At DOSCEL, we are committed to continuously evaluating the effectiveness of our actions in addressing modern slavery risks. Our efforts encompass a range of initiatives, including the development of policies and processes, provision of awareness training for staff, and the establishment of clear metrics to gauge progress.

Collaboration is at the heart of accelerating progress. This also includes opportunities to comparatively measure social, environmental and governance (business ethics) risks and actions with peers in our network.

ACAN Effectiveness Assessment

Measuring effectiveness is assessed by completing the annual ACAN Entity Profile Survey which generates the Baseline Data metrics that can be compared against the previous reporting period

The table below evidences the significant progress made against the prior period using the Base Line data captured by ACAN around actions taken by DOSCEL staff and suppliers. DOSCEL's strong focus on encouraging suppliers to complete ACAN surveys and join Sedex have resulted in a significant number of suppliers engaging in these processes.

	ACTIVITY	2024 DOSCEL	2025 DOSCEL
INTERNAL / STAFF	Hours spent on modern slavery activities	310	220
	Individual staff completed e-learning	2	0
	E-learning modules completed	4	0
EXTERNAL / SUPPLIER ENGAGEMENT	Total number of suppliers	6789	7112
	Number of suppliers with visible contact information and ABN	**	0
	Number of suppliers across high-risk categories	847	915
	Number of ACAN Supplier Surveys completed	294	750
	Supplier staff attending capacity building webinars	4	16
	Invited to join Sedex	12	253
	Joined Sedex	75	91
	Sedex SAQ completed	34	66
	Social audits	8	13
	Corrective actions	43	86
	Contacts made via worker voice / grievance mechanism	0	0
DOMUS 8.7 EXTERNAL REFERRALS	Referrals for advice and assistance	0	0
	Individuals identified or referred for modern slavery assessment	0	0
	Individuals with modern slavery cases remediated	0	0

Looking ahead to 2026, DOSCEL is focused on operating under the *DOSCEL Strategic Plan 2025 -2028*. The Strategic Plan outlines DOSCEL's Vision, Mission and Values of:

- *Vision*: Faith-inspired educational excellence for a hope filled future.
- *Mission*: To deliver sustainable and inclusive education that nurtures each student's potential, equips them to thrive in a dynamic world, and is enriched by our flourishing Catholic culture.
- *Values*: Integrity, Excellence and Inclusion.

A Key Program outlined in the Strategic Plan is the development of a new Procurement Framework with the outcome that *"DOSCEL engages in ethical, sustainable and strategic sourcing practices"*. The success measures of this Key Program are:

- DOSCEL operates within the established Procurement Framework supporting and promoting sustainable and ethical supply chains
- DOSCEL Modern Slavery Statements evidence substantial annual improvement in procurement activities.

Through this Key Program we will transition towards the development of a multi-year plan to address modern slavery, guided by ACAN. This strategic shift will allow us to optimise resource allocation for sustained impact, fostering a more integrated strategy that holistically addresses modern slavery risks.

While our due diligence efforts have primarily focussed on direct suppliers to date, multi-year planning aims to expand these efforts further down the supply chain. Furthermore, by expanding our planning horizon, DOSCEL aims to cultivate a clearer long-term vision for combating modern slavery, positioning us to make meaningful and lasting change.

Criteria 6: Consultation with entities owned or controlled

DOSCEL does not own or control any other entities.

Criteria 7: Other relevant information

There is no other relevant information to report.

Modern Slavery Statement

**1 January - 31 December
2025**

In the spirit of reconciliation, VCEA acknowledges Aboriginal and Torres Strait Islander people as the traditional custodians of the land and pays respect to their Elders past and present.

Victorian Catholic Education Authority Limited (VCEA)

ABN: 92 119 459 853

Level 6, 486 Albert St, East Melbourne, VIC 3002

vcea.catholic.edu.au

Email: secretary@vcea.catholic.edu.au

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Welcome from Chair

As Chair of the Board of Victorian Catholic Education Authority Limited (VCEA) I am pleased to present VCEA's third modern slavery statement under the *Modern Slavery Act 2018* (Cth). This Statement sets out the progress that VCEA has made towards identifying, assessing and addressing modern slavery risks during the 2025 reporting period.

Respect for human dignity is central to Catholic education and wholly incompatible with modern slavery in any form. As a steward of public resources and a leader within the Catholic education sector, VCEA recognises its responsibility to identify, assess and address modern slavery risks in its operations and supply chains.

This Statement outlines the progress made during the year and reflects the Board's ongoing oversight of VCEA's modern slavery risk management framework. While our inherent risk exposure remains low, the Board remains committed to continuous improvement and to strengthening our governance, controls and engagement over time

This Modern Slavery Statement was approved by the Board, which is the principal governing body of VCEA, at its meeting on 26 June 2026.

James Merlino, Chair
26 June 2026

Criteria 1: About the Victorian Catholic Education Authority

VCEA is the peak body for Catholic school education in Victoria. VCEA exists to advance the mission of Catholic school education in the State of Victoria, in the service of students, families and the broader community.

Through the delivery of the Objects set out in its Constitution, VCEA advances a Catholic vision of education where every student's life is understood as a gift. Each student in a Catholic school throughout Victoria will be afforded every opportunity to come to the fullness of life. VCEA will strive for excellence in education through the delivery of responsive and quality educational practices.

Central to VCEA's mission is the advancement of every child throughout their educational journey to allow them to mature in every dimension of their lives through the formation of their intellectual, spiritual, physical, and social capacities. Through the equitable sharing of resources among Catholic educational providers, VCEA's mission is to enable students to flourish, to grow in awareness of their unique gifts and to confidently embrace their future with hope, in faith, and through love. VCEA:

- a) seeks to integrate this work of educating with the explicit proclamation of the Gospel of Jesus Christ in fostering communities of learning and teaching, which recognise and nurture the dignity of each person, created in the image of God.
- b) strives to ensure that Catholic schooling in Victoria is distinguished by its intellectual, practical, and moral excellence, and fosters a formation of the whole person that is deeply and enduringly humanising.
- c) upholds the rights of parents, as the first teachers of their children, to access Catholic schooling which provides a religious and moral formation that is aligned with their conscience and religious faith.
- d) promotes the common good in its structures, policies and actions by advocating for appropriate access to, and funding of Catholic schooling in Victoria, and ensuring the just distribution of education resources.

- e) recognises the ecclesial identity of each Catholic school, and the bond of communion with its diocese, parish or religious institute that underpins its foundation, and seeks to nurture them by promoting dialogue and
- f) cooperation among all Catholic School education providers, Catholic entities, and with the general community.

VCEA works in close collaboration with Catholic school proprietors across Victoria. These comprise:

- Melbourne Archdiocese of Catholic Schools Ltd (MACS), responsible for governance and operation of 291 schools in Archdiocese of Melbourne
- Diocese of Ballarat Catholic Education Limited (DOBCEL), responsible for governance and operation of 57 schools in the Diocese of Ballarat
- Diocese of Sale Catholic Education Limited (DOSCEL), responsible for governance and operation of 44 schools in the Diocese of Sale
- Catholic Education Sandhurst Limited (CES), responsible for governance and operation of 51 schools in Diocese of Sandhurst.
- Catholic Religious Institute and Ministerial Public Juridic Persons School Proprietors (RI/MPJPs), responsible for governance and operation of 51 schools across Victoria.

Governance structure 2025

Company Members

Most Rev Peter A Comensoli DD Archbishop of Melbourne
Most Rev Paul Bird CSsR MA DD Bishop of Ballarat
Most Rev Gregory Bennet MS STL Bishop of Sale
Most Rev Shane Mackinlay DD Bishop of Sandhurst (to 18 June 2025)
Very Rev Dr Brian Boyle EV Diocesan Administrator of the Diocese of Sandhurst (appointed from 15 September 2025)
Sr Eileen Ann Daffy rsm

Board

James Merlino, Chair
Patricia Cowling, Director
Lynn Glover, Director
Brian Loughnane, Director
Marcelle Mogg, Director
Damian Murphy, Director
Chris O'Grady KC, Director

Board Committees

VCEA Consultation Committee
Catholic Mission Committee
Education and Performance Excellence Committee
Finance, Risk and Audit Committee
People and Employment Relations Committee
Review Body and Compliance Committee
Nominations Committee
Capital and Infrastructure Committee (from 20 May 2025)

Executive Leadership

Professor Elizabeth Labone, Chief Executive Officer
Tracey Bannan, Chief Operations Officer
Samantha Cullen, Chief Financial Officer
Bruce Phillips, Chief Strategy Officer

Criteria 2: Operations and supply chain

VCEA is a not-for-profit organisation operating from an office in East Melbourne, Victoria.

VCEA provides services and undertakes various functions for Catholic school proprietors and Catholic schools in Victoria, working in close collaboration with proprietors. Pursuant to its charitable purposes, the services and functions of VCEA are as follows:

- Acting as the approved authority for the funding of Catholic Schools in Victoria
- Acting as review body for all Catholic Schools in Victoria with responsibilities for registration and assuring compliance School registration and compliance
- To represent and negotiate on behalf of Catholic School Proprietors in the enterprise bargaining process
- To administer the Long Service Leave Scheme
- Representation and advocacy
- Under the oversight of the Bishops, promote and deepen the shared identity of Catholic schools in the mission of the Catholic Church
- To undertake research related to the objects of the Company
- To facilitate statewide initiatives to improve the quality, experience and outcomes of Catholic School education.
- State-wide performance of Catholic schools
- To facilitate collection and analysis of data
- To promote statewide accreditation to teach in Catholic schools.

Risk Management

VCEA adopts a strategic, consistent, and structured enterprise-wide approach to risk management to achieve an appropriate balance between realising opportunities and minimising unexpected outcomes.

VCEA views risk management as an integral part of sound management practice and an essential element of good corporate governance and responsible stewardship. It reinforces accountability, enhances decision-making and improves outcomes. VCEA recognises that risk arises in all aspects of its operations and at all stages within the life cycle of those operations. This is true of modern slavery risks.

The VCEA Board is accountable for overseeing and monitoring the assessment and management of risk.

Throughout 2025, the Board was supported in the discharge of its risk management oversight responsibilities by the Finance, Risk and Audit Committee (FRAC).

At each meeting in 2025 FRAC reviewed the enterprise risk register. The enterprise risk register identifies those risks assessed by management as requiring ongoing monitoring, including where the level of exposure is elevated or where the risk exceeds VCEA's risk appetite (as set by the Board from time to time).

In 2025, VCEA assessed its exposure to modern slavery risk against its risk management framework. Based on that assessment, modern slavery risk was determined to be within the Board-approved risk appetite and tolerance. Modern slavery risk exposures and progress against the action plan are reported to FRAC on a biannual basis.

Organisational Structure and Workforce Profile

As at 31 December 2025, VCEA employed 87 personnel (comprising 86 employees and one agency staff member), all of whom were based at its East Melbourne office.

VCEA is committed to fair, ethical and non-discriminatory recruitment practices. VCEA’s preferred recruitment model is direct recruitment. Recruitment and selection activities are undertaken through transparent external channels (including Seek and executive recruitment firms). Recruitment decisions are made by reference to standardised position descriptions and key selection criteria.

VCEA employees may work remotely for up to two days per week, in accordance with VCEA’s working arrangements. The figure below represents VCEA’s organisation structure at 31 December 2025.

Criteria 3: Modern Slavery risks

Risks in Operations and Supply Chains

VCEA assesses the risks of modern slavery practices in its operations and supply chain by considering its potential to cause, contribute to, or be directly linked to modern slavery through its operations or supply chain.

VCEA's suppliers are predominantly Australian professional services related. As such, VCEA has rated its inherent exposure to modern slavery risk as low, its control environment as acceptable and the risk within the appetite established by the Board.

Our membership with the Australian Catholic Anti-Slavery Network (ACAN) assists us in gaining insight into our operational activity partners and suppliers. With ACAN's support we continue to operate an ongoing risk assessment system for VCEA suppliers.

VCEA as a peak body provides services and undertakes various functions for Catholic school proprietors and Catholic schools in Victoria. VCEA, in turn, procures a range of goods and services to support its operations and these services. All new suppliers introduced in 2025 underwent modern slavery risk identification and assessment.

VCEA's supplier-based risk profile remained stable throughout 2025. VCEA suppliers and spend are categorised with the ACAN Category Risk Taxonomy, which is based on the Global Slavery Index and International Labour Organisation (ILO) definitions of modern slavery.

VCEA engaged with 196 suppliers throughout 2025, with 71 suppliers having completed the ACAN supplier survey.

- 28 suppliers have joined SEDEX (Supplier Ethical Data Exchange) platform
- VCEA recorded 4% of spend in a high-risk procurement category, which equates to 44 suppliers.

VCEA's largest categories of expenditure in 2025 were in the following categories

- Facility Management and property maintenance 31.8%
- Labour Hire and Recruitment 26.3%
- Events and event management 17.9%
- Finance and Investment 13.9%

A total of 44 suppliers were identified within high-risk procurement categories (based on the ACAN Category Risk Taxonomy), of which 4 provided labour hire and recruitment services to VCEA.

VCEA's top 10 spend suppliers in 2025 represented 74% of total expenditure in the categories of Professional Services (low risk), IT Software and Network Services (medium risk) and License and Membership Fees (low risk).

IT Procurement

VCEA recognises an elevated risk of modern slavery exposure within the IT hardware supply chain and adopts a responsible sourcing approach that includes assessment of the market for well established companies that adopt their own stringent modern slavery obligations within their supply chains.

VCEA procures software and provides consultancy services, as a service supplier, to schools for their student management, financial and payroll systems. As a supplier, VCEA ensures compliance with ethical sourcing and modern slavery obligations.

Employment Risk & Modern Slavery Mitigation

VCEA maintains a directly employed workforce and engages labour hire or professional consultancy support for specialised requirements or periods of increased demand.

The People and Culture team oversees compliance with labour, employment, and immigration laws through a structured framework of policies and procedures.

VCEA is committed to maintaining strong governance measures to mitigate modern slavery risks within its employment practices. This includes ensuring that policies, procedures, and guidelines are in place to safeguard employee rights, workplace safety, and overall wellbeing both within the VCEA organisation and with the labor hire and recruitment service providers.

Strengthening Employment Governance

VCEA conducts regular reviews of its employment related policies, governance structures, and remuneration frameworks to ensure compliance with employment laws and alignment with best practice conditions and fair remuneration. These reviews reinforce VCEA's commitment to preventing exploitation and maintaining an ethical and transparent workplace.

As part of this commitment, in 2025, VCEA implemented actions arising from a 2024 remuneration framework review and developed and implemented an action plan following a 2024 payroll audit. The audit assessed compliance with legal requirements, industry benchmarks, and fair pay practices. The review identified recommendations focused primarily on strengthening documentation and validation of existing payroll processes rather than requiring changes to current practices. All appropriate identified actions have now been implemented.

To support continuous improvement and oversight, VCEA has commissioned a new payroll provider in 2025. Once implementation is complete, a further payroll audit will be undertaken to confirm ongoing compliance. VCEA employs staff under the Catholic Education Multi-Enterprise Agreement 2022 as well as under common law contracts.

Safe & Ethical Recruitment Practices

VCEA uses competency-based position descriptions, supported by clear policies and procedures, to ensure transparent and ethical recruitment, selection, and appointment of employees. VCEA has a Code of Conduct that governs how employees conduct themselves in VCEA operations.

Some staff are engaged through agency and other labour hire arrangements. VCEA only engages staff from registered labour hire agencies (when required) to verify consultants and short-term temporary staff, ensuring all workers have valid working rights and meet ethical employment standards.

VCEA engages external specialist immigration lawyers as needed to support visa holders, ensuring compliance with immigration legal requirements.

Criteria 4: Actions taken to assess and address Modern Slavery risks

VCEA continued its partnership with ACAN and participation within the ACAN Modern Slavery Risk Management program in the 2025 reporting period and its commitment to enhancing its performance to address modern slavery risks in its operations.

During the reporting period, VCEA continued to engage Melbourne Archdiocese Catholic Schools Ltd (MACS) under a Master Services Agreement for the provision of key business functions, including accounts payable, payroll and information technology (IT) services. In relation to these services, VCEA relies on MACS' modern slavery control environment as part of the relevant service delivery arrangements. MACS is also a partner with ACAN.

Strategic actions taken by VCEA during 2025 to enhance its robust management processes for the management of modern slavery risk include:

- Ongoing development and review of VCEA policies approved by VCEA management and Board
- Building capacity through the recruitment of a Procurement and Facilities role that serves as the Modern Slavery Liaison Officer (MSLO) to ACAN
- Attendance and participation by the VCEA MSLO to SEDEX platform training
- Approval of a revised Procurement Policy
- Modern Slavery Working Group quarterly meetings delivering biannual Modern Slavery risk reporting to the Finance, Risk and Audit Committee
- Completion of a modern slavery risk and control assessment
- Completion of two desktop supplier audits from the high-risk category
- Ongoing action plan review
- Continued rollout of mandatory e-learning platform and training modules to the workforce including delivery of Modern Slavery learning modules
- Annual employee engagement surveys
- Strengthening of financial delegations, contract and supplier engagement processes
- Embedding modern slavery screening for potential and new suppliers through tender and supplier onboarding processes that include modern slavery requirements.
- Continued supplier engagement in collaboration with ACAN resulted in supplier survey completion by 71 suppliers, with 24 suppliers invited to join SEDEX.

Criteria 5: Measuring effectiveness

Continuous Improvement

Collaboration is at the heart of accelerating progress. This also includes opportunities to comparatively measure social, environmental and governance (business ethics) risks and actions with peers in our network.

In its foundational stages, VCEA used an internally devised ACAN framework to measure progress. This bespoke approach reflected the unique priorities, constraints, and practices across Catholic organisations.

In 2025, the ACAN Program adopted a globally recognised risk measurement system through SEDEX. This aligns reporting entities with a methodology that combines global data about risks in different countries and industries with site-specific information from the SEDEX platform. SEDEX regularly updates the methodology to ensure it is aligned with new and emerging risks. Therefore, completion of the SEDEX SAQ completed by VCEA is a substantial measure of continuous improvement year on year. By experiencing the SAQ from the supplier's perspective, we better understand the complexity of the questions, the evidence required, and the practical challenges suppliers face. Below is an explanation of how scoring is calculated using the SEDEX SAQ and VCEA 2025 risk scores and management controls that will serve as our benchmark for continuous improvement.

VCEA's combined risk score from the SEDEX SAQ is 2.9/10 and is categorised as low risk.

The combined risk score is calculated from inherent risk and site characteristics, adjusted for management controls and audit results. The score is broken down by pillar and highlights strengths and opportunities to focus our efforts on key areas that drive ethical and sustainable practices.

VCEA's inherent risk score is 2.4/10, categorised as low risk and predicts potential risks based on a country/region, and sector. Spanning all four pillars, this score is broken down by topics. It can be used as a baseline to identify and prioritise areas for improvement in operations. This score shows the natural risks of doing business in a specific country or sector. It does not include any details about individual sites. The inherent risk is low based on the location of the VCEA office and the nature of its operations.

Pillar	Score out of 10
Labour Standards - assesses location and industry factors that could increase labour risks, such as vulnerable worker populations or high rates of workplace violations.	2.5
Health and Safety - considers regional and industry-specific health and safety risks, including local regulations and industry accident rates.	1.4

Activity		2024	2025
	Joined SEDEX	14	28
	SEDEX SAQ completed	4	15

Looking ahead

VCEA is committed to continuous improvement in partnering with our stakeholders to proactively work to reduce modern slavery and key priorities for 2026 include the following:

Operations (systems and processes)	- Expand awareness around the remedy pathway to address and respond to modern slavery practices identified in operations or supply chain - Refresh internal guidance materials (intranet / induction) so staff can identify red flags, know how to report, and understand available support pathways
Risk management	Annual modern slavery risk assessment and testing of the effectiveness of VCEA's control structures that address modern slavery risk
Supply chain and Engagement	- Ongoing review and refinement of procurement processes - Increase the number of desktop supplier audits in high-risk categories and document follow-up actions, including supplier improvement plans where needed - Invite new high and medium risk category suppliers to complete the ACAN supplier survey and join SEDEX - Encourage suppliers to join the 2026 ACAN supplier webinar series
Effectiveness of Actions (engage, educate & respond)	- Expand modern slavery e-training modules for completion to the VCEA Board and Board Committees - Test awareness and accessibility of reporting channels and response arrangements (e.g., periodic staff pulse questions, process walk-throughs, and lessons learned reviews)

Remediation

VCEA is committed to ensure the provision of appropriate and timely remedies to people impacted by modern slavery through its partnership with Domus 8.7.

When suspicions of modern slavery practices come to VCEA's attention through internal employee relations processes, whistleblowers or other channels, VCEA's policy and processes call for it to contact relevant law enforcement agencies if a person is in immediate danger or Domus 8.7 for an assessment, investigation, action planning and implementation of a remediation process.

Criteria 6: Consultation

VCEA has no controlled entities that require consultation.

In preparing the 2025 Modern Slavery Statement, the following functions have been consulted and/or have contributed material to ensure the statement accurately reflects the practice and policies applied.

Team or function	Input
Finance	Operations and supplier spend
Risk	Risk management approach with respect to modern slavery
People and Culture	Working conditions of employees and contractors, the implementation of training programs to educate on modern slavery risk and other steps to build a culture that places priority on modern slavery and other human rights abuse risks.
Legal	Contractual and legal obligations and legislative requirements
Communication and Advocacy	A description of the current operating context and renewed governance systems

Criteria 7: Any other relevant information

Case Studies

VCEA continued to strengthen its due diligence through the introduction of desktop audits that draws upon collection and review of public available information, viewing of relevant policy where possible and requesting details of approach within operations. Two desktop audits with suppliers from high-risk categories were completed within the period with findings positioning for collaborative dialogue with suppliers around modern slavery practices.

In the assessment of a new cleaning provider for VCEA, given the high-risk industry, an assessment of modern slavery within their operations was undertaken through a prequalified contractor of the Cleaning Accountability Framework (CAF). The CAF offers a safeguard framework through assessment of labor principles for cleaning personnel, such as compliance with the Fair Work Australia and modern awards.

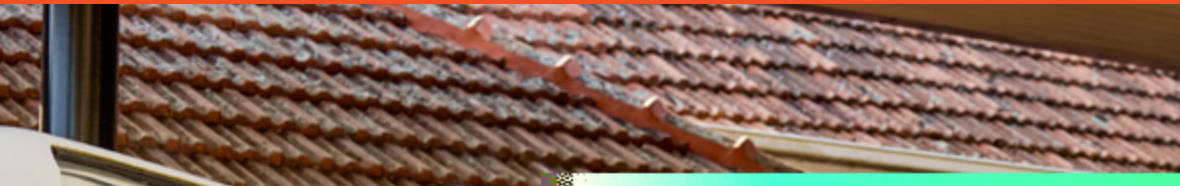
Modern Slavery Statement

1 January – 31 December 2025

Modern Slavery Statement

1 January to 31 December 2025

Villa Maria Catholic Homes Ltd ABN 32 004 364 103



VMCH

Chair's introduction



At the core of VMCH's Catholic mission is a commitment to uphold the dignity, safety and wellbeing of all people, particularly those who are vulnerable, including older people and people living with disability. This extends to a strong commitment to preventing modern slavery in all its forms across our operations, workforce, volunteers and supply chains.

We recognise that modern slavery remains a risk within our sector and may arise through practices such as forced labour, exploitation of vulnerable or migrant workers, and unfair employment conditions. VMCH has zero tolerance for these practices.

As an ethical provider, we are committed to identifying, managing and mitigating modern slavery risks through robust governance, due diligence, and continuous improvement. This includes strengthening our policies and controls, enhancing supplier oversight, and building capability across our workforce.

VMCH thanks our valued staff and suppliers for their support, transparency and co-operation in support of our Modern Slavery Compliance Framework. We look forward to continuing this work to further develop our framework and strengthen our capacity to actively manage and remediate potential modern slavery risks and protect the most vulnerable members of our supply chains.

This Statement represents VMCH's 2025 Modern Slavery Statement, prepared in accordance with the Modern Slavery Act 2018 (Cth). It reflects our ongoing commitment to transparency, accountability and continuous improvement, supported by a clear risk appetite of no tolerance for modern slavery.

A handwritten signature in black ink, appearing to read 'Julien O'Connell'.

Julien O'Connell AO
VMCH Board Chair

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1. Reporting Period: 1 January – 31 December 2025

This Modern Slavery Statement is made by **Villa Maria Catholic Homes Limited (VMCH)** (ABN: 32 004 364 103) in accordance with the Modern Slavery Act 2018 (Cth).

This statement covers the activities of VMCH for the reporting period. VMCH does not own or control other reporting entities. VMCH is a member of the Australian Catholic Anti-Slavery Network (ACAN), a coalition of Catholic organisations working collaboratively to combat modern slavery.

2. Structure, operations and supply chains

Structure and operations

VMCH is a Catholic, for-purpose organisation providing services in Victoria to over 10,000 people across:

- Residential Aged Care
- Disability Services
- Specialist Education
- Retirement Living
- Affordable Homes
- At-Home Aged Care.

VMCH operates predominantly in Victoria and employs a diverse workforce supported by contractors and a valued network of volunteers, who contribute to service delivery and community engagement.

Mission and Values

Our mission is to deliver compassionate care and support to people at all stages of life. This mission underpins our commitment to uphold human dignity and prevent exploitation in all its forms, including modern slavery.

Supply chains

VMCH's supply chains include procurement of goods and services such as:

- Labour hire and agency staff
- Cleaning, catering and facility management
- Medical and care-related supplies
- Information technology and systems
- Construction and capital works.

These supply chains may involve multiple tiers, including domestic and international suppliers.

3. Modern slavery risks

Modern slavery risks are heightened where individuals experience vulnerability, including due to age, disability, cultural or linguistic barriers, or socio-economic disadvantage. As a provider of services to these cohorts, VMCH recognises the importance of proactively identifying and mitigating these risks to prevent harm and uphold the rights and dignity of those in our care and broader ecosystem.

VMCH recognises that modern slavery risks may arise in both operations and supply chains.

Operational risks

- Use of temporary or agency labour
- Workforce vulnerability in lower-paid roles
- Reliance on third-party service providers.

Supply chain risks

Higher-risk categories include:

- Labour-intensive services (cleaning, catering, maintenance)
- Procurement of goods sourced from offshore or complex supply chains
- Construction and capital projects
- ICT hardware and manufacturing supply chains.

VMCH acknowledges that risks may be heightened where there is limited visibility across supplier tiers.

4. Actions taken to assess and address risks

VMCH has implemented a range of controls to identify, assess and mitigate modern slavery risks.

Governance and frameworks

- Integration of modern slavery into VMCH's enterprise risk management framework
- Oversight by Executive and Board committees
- Alignment with ethical sourcing and procurement principles.

Policies and procedures

- Procurement and supplier management policies
- Code of Conduct applicable to employees, contractors and volunteers
- Whistleblower and incident reporting mechanisms.

Supplier due diligence

- Risk-based supplier onboarding processes
- Inclusion of modern slavery clauses in supplier contracts
- Supplier declarations and compliance expectations.

Risk assessment

- Identification of high-risk supplier categories
- Periodic review of procurement and supplier arrangements
- Consideration of sector-specific and emerging risks.

5. Assessing effectiveness of actions

VMCH has implemented a range of controls to identify, assess and mitigate modern slavery risks.

- Internal audit and assurance activities
- Monitoring of supplier compliance and performance
- Risk reporting and oversight through governance structures
- Review of incidents, complaints and disclosures.

Continuous improvement is embedded through periodic review of controls and frameworks.

6. Consultation

VMCH engages with relevant internal stakeholders across our teams in:

- Procurement
- Risk and compliance
- Operations and service delivery.

Importantly we engage with our community, including our clients, suppliers and volunteers.

This consultation supports identification of risks and implementation of controls across our organisation and provides a voice to our community.

8. Future commitments and continuous improvement (2026)

VMCH is committed to strengthening its approach to modern slavery risk management over the next 12 months, with a focus on the following key initiatives:

8.1 Supplier due diligence uplift

- Enhance supplier onboarding and periodic review processes
- Introduce stronger evidence-based validation and verification of supplier practices
- Implement risk-based and preferred supplier segmentation to prioritise and guide our procurement decisions
- Strengthen pre-engagement screening for high-risk categories and geographies.

8.2 Monitoring, assurance and validation

- Expand ongoing monitoring of supplier compliance, including attestations and targeted reviews
- Increase assurance activities to validate the effectiveness of controls and mitigation strategies
- Improve documentation, audit trails and traceability of supplier assessments.

8.3 Policy and framework refresh

- Comprehensive review and uplift of procurement, supplier management and modern slavery policies and procedures
- Provide accessible documents, processes and engagement to ensure our staff and suppliers clearly understand modern slavery risks and their obligations
- Incorporate learnings from recent sector issues and emerging risks across aged care, disability and community services
- Align policies with evolving regulatory expectations and better practice.

8.4 Training and capability building

Refresh and expand targeted training for:

- Procurement teams
- Contract managers
- Operational leaders.
- Strengthen awareness of modern slavery indicators, reporting pathways and obligations.

8.5 Risk management and governance enhancements

- Continue to embed modern slavery risks within the enterprise risk framework
- Review and refine the modern slavery risk appetite statement
- Strengthen reporting to Executive and Board committees, including clearer metrics and insights.

8.6 Supporting vulnerable cohorts and inclusive practice

VMCH will continue to strengthen its approach to preventing modern slavery by embedding a person-centred and inclusive lens across all improvements, ensuring that the needs of vulnerable cohorts including older people, people living with disability, and those from diverse backgrounds.

Our focus areas for the next 12 months include:

- **Accessible and inclusive communication**
Reviewing and enhancing all modern slavery-related materials (including policies, training and reporting channels) to ensure they are accessible, culturally appropriate and available in formats that meet the needs of diverse cohorts, including people with disability and those with limited English proficiency.

- **Safeguarding-informed risk controls**

Strengthening risk mitigations to ensure they are designed with vulnerability in mind, including consideration of power imbalances, dependency relationships, and increased susceptibility to exploitation across service delivery, workforce and supply chain interactions.

- **Workforce capability and awareness**

Continuing to build staff and volunteer capability to recognise and respond to modern slavery risks affecting vulnerable individuals, including targeted training for frontline, procurement and contract management roles.

- **Inclusive supplier and partner practices**

Enhancing due diligence and engagement with suppliers and partners to ensure expectations regarding ethical labour practices extend to the treatment of vulnerable workers, including migrant and low-paid workers.

- **Community and consumer voice**

Strengthening mechanisms to capture and respond to feedback, concerns and lived experience from clients, families and communities, ensuring that those most at risk are supported to safely raise concerns.

- **Continuous monitoring and improvement**

Ongoing review of controls, incidents, sector developments and emerging risks to ensure our approach remains responsive, effective and aligned with best practice and community expectations.

Through these initiatives, VMCH aims to ensure that its modern slavery response not only mitigates risk but actively supports and protects the dignity, rights and safety of the people and communities it serves.

8.7 Sector monitoring and continuous improvement

- Monitor developments across 2025–2026, including regulatory changes and sector-specific risks
- Incorporate lessons learned from recent incidents and experiences within the sector and broader environment
- Explore collaboration and shared learning opportunities across the sector.

8.8 Data, metrics and reporting uplift

- Improve data collection and reporting on supplier risk and compliance
- Develop Key Risk Indicators (KRIs) and performance metrics
- Enhance transparency and quality of future modern slavery reporting.

9. Approval

This statement has been approved by the VMCH Board of Directors on 30 April 2026.

More information

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Join the conversation



Villa Maria Catholic Homes ABN 32 004 364 103



CATHOLIC EDUCATION
WESTERN AUSTRALIA



Modern Slavery Statement

1 January – 31 December 2025



Catholic Education Western Australia Limited

Catholic Education Western Australia Limited

ABN 47 634 504 135

Acknowledgement to Country

Catholic Education Western Australia Limited (CEWA) acknowledges the Traditional Owners of the lands on which we live, learn and work. CEWA acknowledges the continued deep spiritual connection and relationship of First Nations people to country and commits to the ongoing journey of reconciliation.

Disclosure Note

This statement has been made on behalf of Catholic Education Western Australia Limited. This statement is prepared pursuant to section 13 of the *Modern Slavery Act 2018* (Cth) and covers Catholic Education Western Australia Limited as a single reporting entity.

CEWA Office:
50 Ruislip Street
West Leederville WA 6007

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Leadership Message

Approval and Signature

Eva Skira AM

*Chair, Catholic Education
Commission of Western
Australia*

Acknowledging the Gospel and the unshakable dignity of every human person, Catholic Education Western Australia Ltd affirms its profound commitment to justice, human rights and the protection of the vulnerable. Our shared Catholic social teaching calls us not only to recognise the reality of human exploitation but to act decisively against it.

Modern slavery in all its forms is a grave affront to human dignity and human rights. It persists in global supply chains and local economies alike, hidden among products, services and procurement processes that often escape scrutiny. As a community of faith and educators entrusted with forming young hearts and minds, we are compelled to confront this injustice with courage, vigilance and hope.

Recent advocacy by Australia's Anti-Slavery Commissioner has highlighted the urgent need for stronger corporate accountability and meaningful action to tackle modern slavery risks. Australian laws that currently require disclosure without enforceable due diligence obligations, penalties or measured outcomes have too often resulted in a "tick-a-box" approach that fails to protect exploited workers and communities. There is a growing call for more robust legal frameworks that require businesses to thoroughly investigate and address modern slavery in supply chains bringing us in line with global norms.

In preparing this Modern Slavery Statement, Catholic Education Western Australia Ltd acknowledges these broader societal concerns and takes seriously the responsibility entrusted to us. Our moral and ethical imperative, rooted in faith and in solidarity with all who suffer exploitation, compels us to identify, address and seek to eliminate any risk of modern slavery within our operations and supply chains. We commit to transparency, continuous improvement and collaboration with our Catholic communities, suppliers and partners as we strive to ensure that our business practices reflect respect for human rights and the common good.

It is our hope and prayer that this Statement not only fulfils our statutory responsibilities but also reflects a deeper spiritual commitment to freedom, justice and human flourishing for all.

Eva Skira AM

Chair

Catholic Education Commission of Western Australia



Leadership Message

Approval and Signature

Annette Morey

*Executive Director,
Catholic Education
Western Australia Limited*

It is my privilege to present to you the Modern Slavery Statement for 2025 for Catholic Education Western Australia Ltd (CEWA).

The Statement operationalises our deeply held belief in the dignity of all human persons, particularly those who are in need or face injustice. Modern Slavery continues to be a complex issue impacting communities not just in Australia but across the world. According to the Global Slavery Index 2023, there are an estimated 41,000 people living in conditions of modern slavery in Australia – that's 1.6 victims for every thousand people in this country.

In his message for the 12th World Day of Prayer and Awareness Against Human Trafficking, Pope Leo XIV noted the scourge of human trafficking was fuelled by 'logic of dominion and disregard for human life' and noted that

“ True peace begins with the
recognition and protection of the
God-given dignity of every person.



As an organisation that is not only committed to reflecting the teachings of Jesus Christ, but which is responsible for shepherding the next generation into adulthood, it is incumbent on us all to serve as examples of the best of humanity, modelling this 'true peace' and recognising that God-given dignity through our words and our actions.

So, it is a source of pride that the phased roll-out of CEWA's new procurement system is progressing. Once complete, this centralised system will allow for identification of high-risk categories and ensure we are able to mitigate risks in our extended supply chains.

Five years on from the launch of our first Modern Slavery Statement in 2021, our schools and offices continue to deepen our collective understanding of this issue and seek to identify and eliminate its root causes.

I thank those staff who have been involved in developing this updated Statement and encourage everyone to consider the impact we can have individually and collectively to eliminate this affront to human dignity.

Annette Morey
*Executive Director
Catholic Education Western Australia Limited*

Criterion 2

Our Structure, Operations and Supply Chains

Our Organisational Structure

In 2025, CEWA was the governing body for 150 CEWA schools and provided registration oversight for an additional eight Catholic schools with their own governing body. The Members of CEWA are the diocesan Bishops of Western Australia.

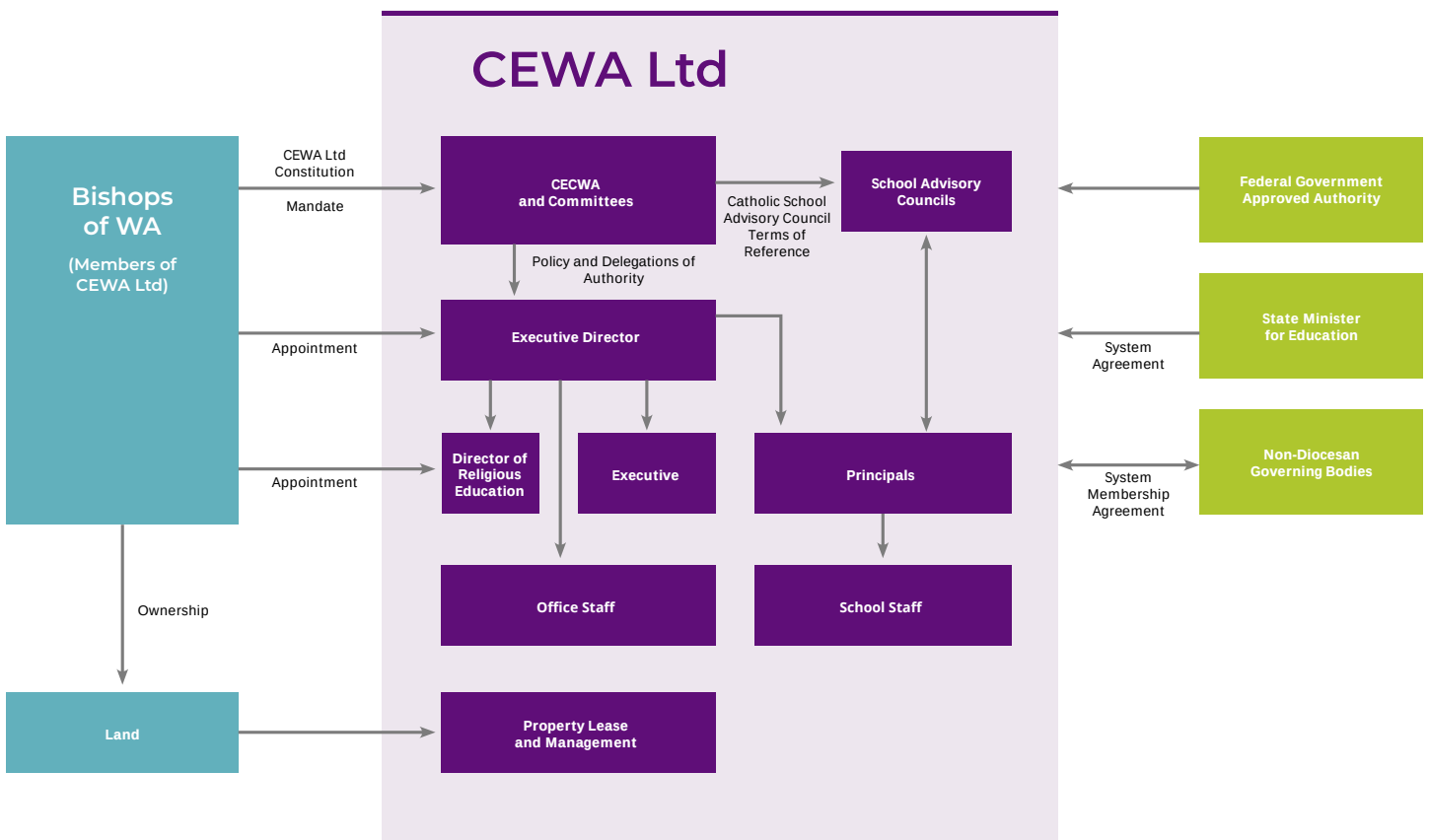
CEWA's annual consolidated revenue in 2025 was \$1,461,073,111.

In addition to being registered as a company with ASIC (ABN: 47 634 504 135), CEWA is registered with the Australian Charities and Not-for-profits Commissioner (ACNC).

The Catholic Education Commission of Western Australia (CECWA), as the Board of Directors of CEWA, directs CEWA to develop learning communities that fulfil the goals of Catholic schools as outlined in the Bishops' Mandate. CECWA is supported through five committees, established to advance the strategic priorities of CEWA and monitor activities. In 2025, these committees included:

- Aboriginal Community Committee;
- Audit and Risk Committee;
- Finance Committee;
- Formation and Workforce Committee; and
- School Improvement Committee.

CEWA's governance structure is illustrated below:



Criterion 2: Our Structure, Operations and Supply Chains (continued)

CEWA schools and Catholic schools with governing bodies

In addition to the 150 CEWA schools, the CEWA System includes eight schools that are governed by five governing bodies other than CEWA. For the purposes of school registration in Western Australia, the eight schools with governing bodies other than CEWA are included within the CEWA System, creating CEWA's responsibility for compliance for all school registration matters. For all governance purposes other than school registration, decisions are taken by the respective governing bodies.

CEWA Executive Team

The Executive Director of CEWA in 2025 was Wayne Bull, succeeded by Annette Morey in July 2025. The Executive Director was supported by the following Directors within the CEWA Executive Team:

Deputy Executive Director	Annette Morey (until July 2025) Julie Hornby (from July 2025)
Director Finance, Infrastructure and Digital Technology	Dr Glennda Scully
Director School Improvement and Wellbeing	Dan Wood
Director People and Culture	Paul Andrew
Director Teaching and Learning	Mandy Connor
Director Religious Education	Rev Mark Powell

The CEWA Executive Team is based in CEWA's West Leederville office (Perth) and is supported by approximately 380 office staff working across the four Catholic dioceses in Western Australia: the Archdiocese of Perth, the Diocese of Bunbury, the Diocese of Broome and the Diocese of Geraldton.

Our Governance Framework

CEWA is guided by a robust governance framework that responds to the high expectations of the Australian Securities and Investments Commission (ASIC), the Australian Charities and Not-for-profits Commission (ACNC), the Bishops of Western Australia, the Federal and State Governments, and CEWA's students, staff, stakeholders and community.

CEWA is governed by four overarching policies aligned with Quality Catholic Education: Catholic Identity, Education, Community and Stewardship. Supporting the four policies are a suite of Executive Directives. CEWA's Executive Directives articulate CEWA's policy requirements and provide directions to be followed across the System.



Criterion 2: Our Structure, Operations and Supply Chains (continued)

Our Operations

CEWA is responsible for the provision of quality Catholic education throughout the state of Western Australia and is the only recognised non-government school system in the State. As well as playing a pivotal role in supporting a developmentally appropriate and engaging teaching and learning program for children and young people, Catholic schools provide vital faith formation, pastoral care and wellbeing support to all involved within the System.

CEWA's wide range of operations include:

- the development of Catechist resources to prepare children not attending Catholic schools to receive the sacraments at the appropriate ages through the Parish Religious Education Program (PREP);
- providing resources, formation training and information to support the work of parish Catechists and Sacrament Coordinators;
- providing outside of hours school care, long day care and vacation care;
- providing flexible and supportive education through our five Curriculum and Re-engagement in Education (CARE) schools to enable young people at risk to continue their education journey in a safe, supportive environment;
- providing access to boarding and residential accommodation to students from families in regional areas so they can access a quality Catholic secondary education;
- providing traineeships, cadetships and scholarships to facilitate career pathways in the education sector for First Nations peoples;
- providing educators and support staff – through the Kimberley Calling program – with the experience of learning, living and serving in the Catholic school communities of the Kimberley, emphasising the abundance of rich personal, professional, cultural and environmental experiences, and unique opportunities and challenges of working in the region offers;
- delivering professional learning experiences to teaching and non-teaching staff throughout Catholic Education Western Australia, including programs and courses in leadership development and accreditation; and
- facilitating research in Catholic schools and informing education policy making and practice.

Criterion 3: Modern Slavery Risks (continued)

Supply Chain Risks

In 2023, CEWA appointed a provider (Zycus Cognitive Procurement) to implement a procurement system that will increase CEWA's understanding and oversight of risks of modern slavery in supply chains and operations, and to enable the organisation to work toward the mitigation and eradication of these risks through responsible procurement. CEWA will continue the process of engaging effectively with suppliers in two ways:

- identifying suppliers in high-risk categories to promote education and information around modern slavery risks through the support of ACAN; and
- embedding appropriate oversight and documentation into the onboarding of both new and existing suppliers and assessing the risk of modern slavery during formal market assessment activities.

The onboarding of suppliers through CEWA's procurement system commenced in March 2025 including an increased compliance with Modern Slavery and supplier categorisation, based on the ACAN Category Risk Taxonomy. This was followed by the commencement of the full implementation of the procurement system at CEWA offices from March 2026, bringing improved conformance, reporting and data capabilities. CEWA will commence full implementation of the procurement system from June 2026.

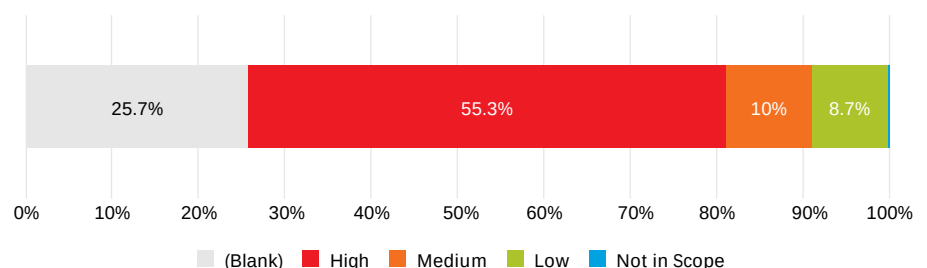
CEWA continues the process to analyse supply chains, especially for high-risk products and geographies, particularly in high-risk and high-spend categories.

CEWA's highest risks areas continue to be identified:

- in the construction industry – both in labour hire and sourced materials;
- in outsourced, labour intensive and low-skilled work, particularly facilities management including cleaning and security; and
- in extended supply chains, especially beyond Tier 1 suppliers.

The table below illustrates the percentage of spend per risk taxonomy for 2025. Compared to 2024, the percentage of unclassified spend decreased considerably: from 80% in 2024 to 25.7% in 2025. This reflects the better integration and application of the risk taxonomy, indicating an improvement in the quality of risk assessments previously not undertaken.

%GT Sum of Entity Total Spend - 2025 by ACAN Taxonomy Risk - Entity





Criterion 4

Actions Taken to Assess and Address Modern Slavery Risks

Actions taken in 2025

Throughout 2025, CEWA continued its commitment to modern slavery prevention, aligned with both the *CECWA Strategic Initiatives 2030* and *Quality Catholic Education (QCE)*. CEWA has maintained membership with the Australian Catholic Antislavery Network (ACAN), a collaboration of 50 Catholic entities throughout all states and territories of Australia.

ACAN Supplier Engagement

The ACAN Program provides supplier engagement support and data, enabling a systematic and comprehensive supply chain risk assessment. In 2025 the ACAN Modern Slavery Risk Management Program launched a new purpose-built data management platform - ROTA. ROTA centralises the ACAN Risk Management Program framework and facilitates supplier performance evaluation and engagement.

- Evaluation of the modern slavery risk within operations and supply chains, using the ACAN Risk Taxonomy.
- ACAN Supplier Survey to identify supplier revenue, number of employees, countries of origin for goods sourced overseas, workforce contractual arrangements and Sedex membership status.
- Supplier education on modern slavery and risk management in key areas: cleaning, building and construction, procurement of labour, labour hire and services, sourcing goods from overseas, grievance mechanisms and remediation.
- Onboarding suppliers to Sedex requires a business address, contact details and goods or services provided.
- Sedex Self-Assessment Questionnaire (SAQ) helps suppliers to evaluate their practices against established standards and identify areas for improvement.
- Desktop review to identify key actions required from suppliers.
- Enhance supplier screening using Know Your Client (KYC) intelligence software.
- Corporate Social Compliance Audits provide a point in time, objective and independent verification process of supplier alignment with local laws and worker wellbeing standards.
- Domus 8.7 Index modern slavery statement assessment on selected suppliers in high-risk categories.
- ACAN Pre-qualified Supplier Directory - a list of preferred suppliers accessible to Catholic organisations.

Zycus Procurement System

During 2025, CEWA continued the roll out of the Zycus procurement system. The introduction of this centralised procurement system will ultimately reduce supplier risk across the organisation, at CEWA schools and offices. Among other benefits of a centralised procurement system, Zycus will introduce a central database of supplier data, instead of the current practice of individual schools managing their own supplier



Criterion 5

Assessing Effectiveness

In assessing the effectiveness of the work to date, CEWA is guided by the relevant legislation with interpretation guided by Catholic Social Teaching principles.

Collaboration is at the heart of accelerating progress. This also includes opportunities to comparatively measure social, environmental and governance risks and actions with peers in our network.

In its foundational stages, CEWA used an internally devised ACAN framework to measure progress. This bespoke approach reflected the unique priorities, constraints and practices across Catholic organisations.

In 2025, the ACAN Program adopted a globally recognised risk measurement system through Sedex. This aligns reporting entities with a methodology that combines global data about risks in different countries and industries with site-specific information from the Sedex platform. Sedex regularly updates the methodology to ensure it is aligned with new and emerging risks. Therefore, completion of the Sedex SAQ by CEWA is a substantial measure of continuous improvement year on year. Below is an explanation of how scoring is calculated using the Sedex SAQ and CEWA's 2025 risk scores and management controls that will serve as our benchmark for continuous improvement.

Explanation of Scoring

Combined Risk Score 4.1/10

Calculated from inherent risk and site characteristics, adjusted for management controls and audit results. The score is broken down by pillar and highlights strengths and opportunities to focus our efforts on key areas that drive ethical and sustainable practices.

Inherent Risk Score 2.9/10

Predicts potential risks based on a country/region and sector. Spanning all four pillars, this score is broken down by topics. It can be used as a baseline to identify and prioritise areas for improvement in operations. This score shows the natural risks of doing business in a specific country or sector. It does not include any details about individual sites.

- **Labour Standards Pillar** - assesses location and industry factors that could increase labour risks, such as vulnerable worker populations or high rates of workplace violations.
- **Health and Safety Pillar** - considers regional and industry-specific health and safety risks, including local regulations and industry accident rates.
- **Business Ethics Pillar** - assesses industry and location risks related to unethical practices, such as high corruption levels or weak regulatory oversight.
- **Environment Pillar** - examines the environmental impact of the site's industry and location, such as pollution levels or resource use that may create regulatory or compliance risks.



Criterion 6

CEWA does not own or control any entities.

Consultation with Owned or Controlled Entities

Criterion 7

No other relevant information.

Any Other Relevant Information

Photo: Lumen Christi College (Martin), Good Shepherd Catholic Primary School (Kelmscott), Sacred Heart Primary School (Thornlie) and St Munchin's Catholic School (Gosnells)

This Modern Slavery Statement 2025 was endorsed by the CEWA Executive Team and approved by the Catholic Education Commission of Western Australia, the board of Catholic Education Western Australia Limited, on 5 June 2026, in accordance with the requirements of the *Modern Slavery Act 2018* (Cth).

Signed



Timothy Shanahan
Chair
Catholic Education Commission of Western Australia

Commissioners of Catholic Education Western Australia Limited 2025

Eva Skira AM	CECWA Chair
Jonathon Woolfrey	CECWA Deputy Chair
Bishop Michael Morrisey	Commissioner
Donella Brown	Commissioner
Wojciech Grzech	Commissioner
Celia Hammond	Commissioner
Dr Frank Malloy	Commissioner
John Palermo	Commissioner
Peter Yensch	Commissioner

CEWA Executive Team 2025

Executive Director	Wayne Bull (until July 2025) Annette Morey (from July 2025)
Deputy Executive Director	Annette Morey (until July 2025) Julie Hornby (from July 2025)
Director Finance, Infrastructure and Digital Technology	Dr Glenda Scully
Director School Improvement and Wellbeing	Dan Wood
Director People and Culture	Paul Andrew
Director Teaching and Learning	Mandy Connor
Director Religious Education	Rev Mark Powell



MODERN SLAVERY STATEMENT



20
25

KAYA NGAJI GURRIJIN HELLO

MercyCare acknowledges Aboriginal and Torres Strait Islander Peoples as Traditional Custodians of Country throughout Australia. We pay our respects to their cultures, Elders past, present and emerging, and we commit to working together for our shared future.

Disclosure Statement

This is a joint Modern Slavery Statement made by MercyCare Ltd (ACN 098 197 490) on behalf of itself and the entities it controls or owns including:

Mercy Community Services Ltd
(ABN 96 487 116 582)

Mercy Human Services Ltd
(ABN 21 612 759 654)

together, or the purposes of this statement
“MercyCare”.

**MercyCare’s Corporate Office is located at
38 Ord Street, West Perth, WA 6005**

Email: Procurement@mercycare.com.au

Tel: 08 9442 3444

Fax: 08 9442 3445

mercycare.com.au

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Approval and Signature

This Modern Slavery Statement was approved by the principal governing body of MercyCare Limited on 4 June 2026 as defined by the Modern Slavery Act 2018 (Cth) (“the Act”).

This Modern Slavery Statement is signed by a responsible member of MercyCare Limited as defined by the Act.



Patrick Walsh
BOARD CHAIR

CRITERION 1

ABOUT US

Our Entities

This statement is prepared in accordance with the requirements of the Modern Slavery Act 2018 (Cth) in relation to the following entities:

MercyCare Ltd
(ABN 098 197 490)

Mercy Community Services Ltd
(ABN 96 487 116 582)

Mercy Human Services Ltd
(ABN 21 612 759 654)

MercyCare is a leading Catholic provider of early learning, family and community services and aged care services.

The foundations of MercyCare are deeply rooted in the vision of Catherine McAuley, who began her work in Ireland during the early 1800s to fight injustices and bring compassion and care to the vulnerable. This mission was carried forward by the Sisters of Mercy, led by Sister Ursula Frayne, who arrived in Fremantle in 1846. For the next century and a half, the Sisters of Mercy delivered education, welfare, and health services in Perth and beyond.

Today, MercyCare continues this legacy by delivering essential services that support individuals across all stages of life, with a focus on assisting those who are most vulnerable. Our commitment to justice and dignity extends beyond direct service delivery to ensuring ethical and responsible practices in our operations and supply chains.

MercyCare is guided by six values—Courage, Integrity, Respect, Justice, Compassion, and Excellence. Modern slavery stands in direct opposition to these values, as it exploits individuals and undermines human dignity for financial gain.

MercyCare's Modern Slavery Working Group oversees efforts to identify, assess, and mitigate modern slavery risks. Comprising representatives from across the organisation, it reports to the Executive Leadership Team, embedding modern slavery considerations into organisational governance.

The Modern Slavery Working Group comprises representatives from Procurement (MSLO), the Office of the CEO, Marketing, and operational functions, ensuring organisation-wide visibility of modern slavery risk.

The group convenes in advance of the reporting cycle to review risk data, assess progress against the action plan, and support the preparation of the Modern Slavery Statement. It reports to the Executive Leadership Team, with escalation pathways in place to ensure material risks or incidents are communicated to the Board.

Our Mission Ethos

Mission Ethos points to our purpose and reason for existence. It gives expression to MercyCare's unique spirit and character. It is how MercyCare thinks, feels and acts in response to our mission by engaging our head, heart and hands.

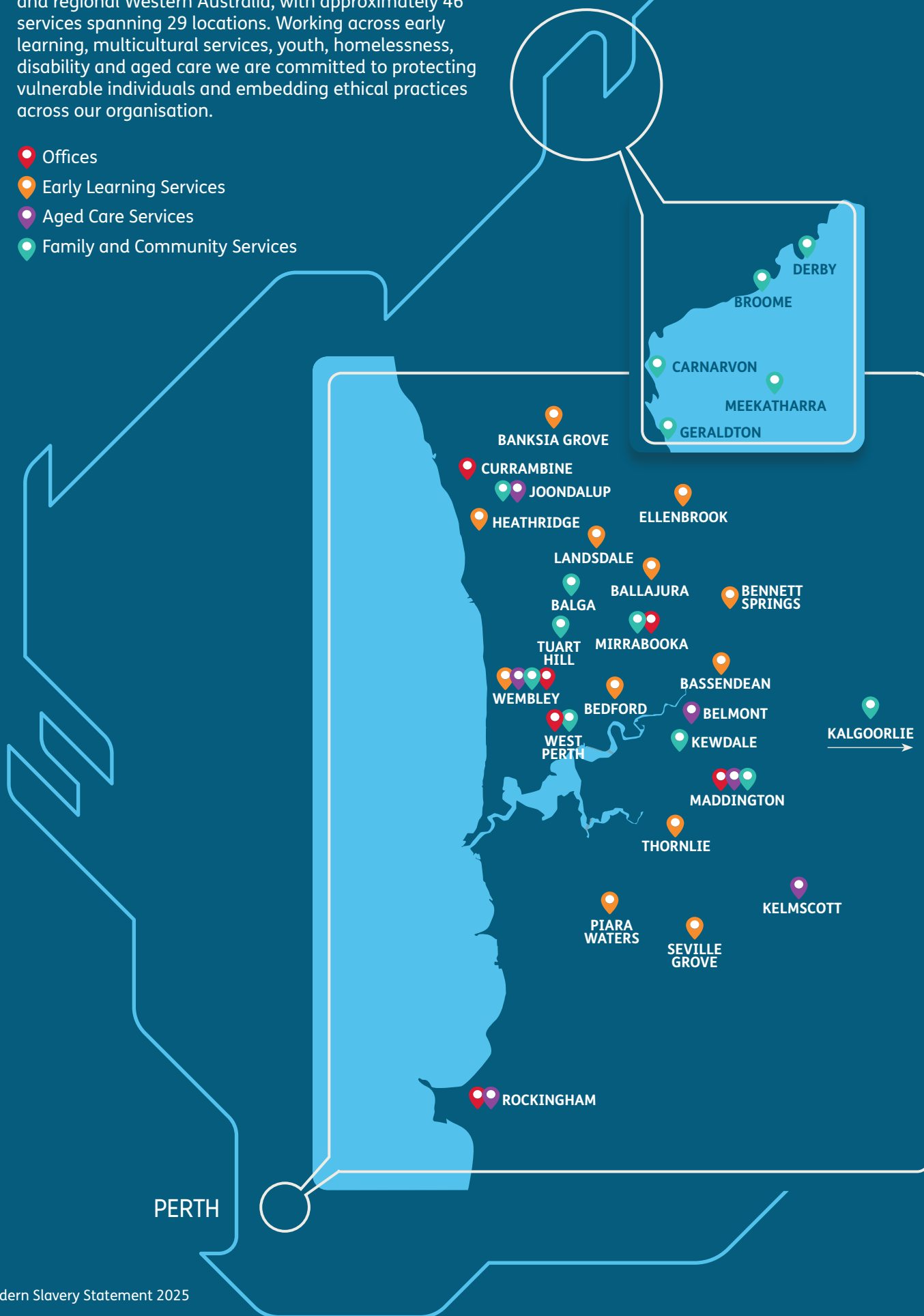


Our Roots

Our Entities (continued)

Our impact extends across the Perth metropolitan area and regional Western Australia, with approximately 46 services spanning 29 locations. Working across early learning, multicultural services, youth, homelessness, disability and aged care we are committed to protecting vulnerable individuals and embedding ethical practices across our organisation.

- Offices
- Early Learning Services
- Aged Care Services
- Family and Community Services



CRITERION 2

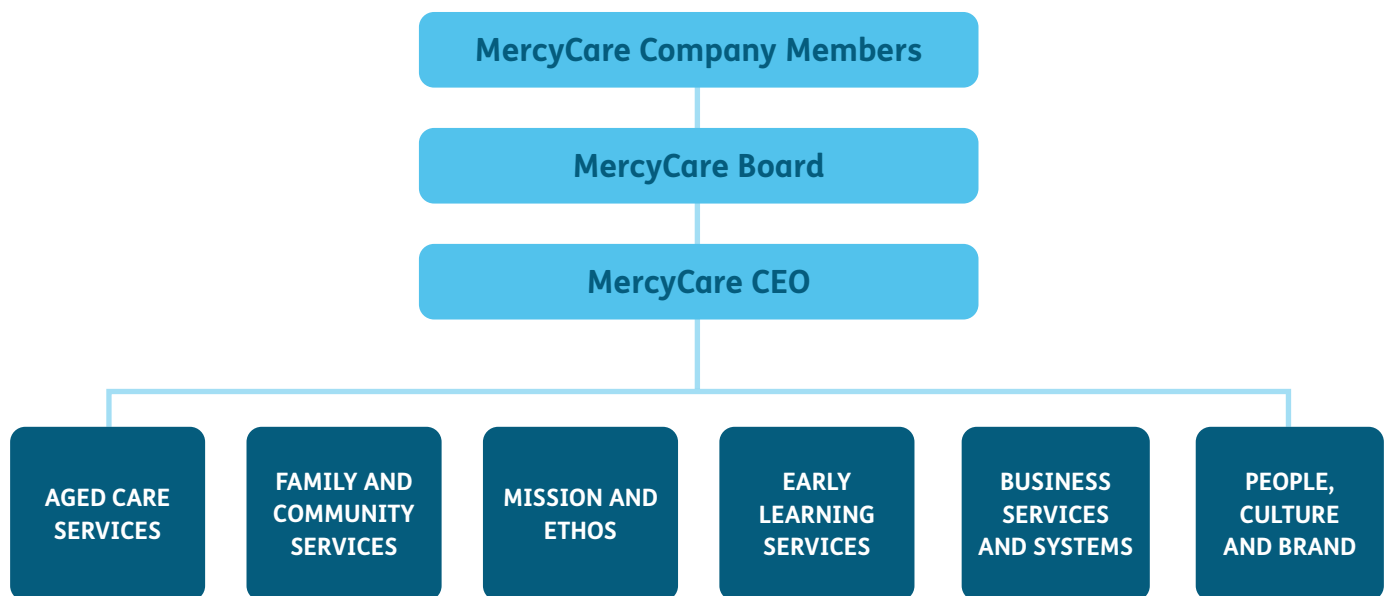
OUR STRUCTURE, OPERATIONS, PEOPLE AND SUPPLY CHAINS

Organisational Structure

MercyCare is a **Public Juridical Person (PJP)**, with **MercyCare Limited** serving as its civil entity. The organisation operates through two subsidiaries:

- **Mercy Community Services Ltd**
- **Mercy Human Services Ltd**

MercyCare's civil entities are companies limited by guarantee, governed by a Board of Directors, and mandated to operate as non-profit organisations in accordance with their constitutions. Additionally, MercyCare Ltd is registered as a charity with the Australian Charities and Not-for-Profits Commission (ACNC) and holds Public Benevolent Institution (PBI) status.



Operations and Services

MercyCare delivers essential community services across Western Australia, primarily within the Perth metropolitan area. The organisation manages Aboriginal Short-Stay Accommodation in the Kimberley region, as well as short-stay accommodation services in the Mid West (Geraldton) and Goldfields–Esperance (Kalgoorlie).

Our core services include:

- **Early Learning Services**
- **Family and Community Services**
- **Community Aged Care**
- **Residential Aged Care**

Modern slavery risk management remains an evolving priority for MercyCare. The organisation recognises the importance of maintaining robust governance foundations while continuing to strengthen its operational approach through measured and proportionate improvements.

To support the identification, mitigation and ongoing management of modern slavery risks, MercyCare has prioritised the following organisational focus areas during the reporting period:

1. **Strengthening supplier risk and governance**
Enhancing oversight of suppliers through risk-based monitoring, qualification processes and governance controls to support ethical and responsible sourcing practices.
2. **Embedding ethical and social procurement practices**
Integrating social procurement and modern slavery considerations into procurement systems, category strategy processes and decision-making frameworks to support consistent application across the organisation.
3. **Enhancing supplier awareness and transparency**
Promoting greater supplier awareness of modern slavery risks and expectations through engagement, information-sharing and participation in external assessment and transparency initiatives.
4. **Building staff capability and awareness**
Supporting staff understanding of modern slavery risks through staff education, awareness initiatives and consideration of how modern slavery information can be embedded into existing learning channels over time.
5. **Governance, review and continuous uplift**
Maintaining appropriate governance arrangements to support the review of policies, processes and actions, and to guide the organisation's ongoing approach to improving modern slavery risk management.

By prioritising these areas, we reaffirm our commitment to delivering high-quality, ethical services while upholding our responsibilities to our clients and broader communities.

Our People

MercyCare's workforce is dedicated to advancing our mission and ensuring high-quality service delivery. The organisation comprises direct and indirect workers, supported by volunteers who contribute to our operations.

1,656
active employees

373 Full-time
933 Part-time
350 Casual

87% / 13%

87% identify as female
13% identify as male

67% / 33%

Senior leadership group is
67% female
33% male

168

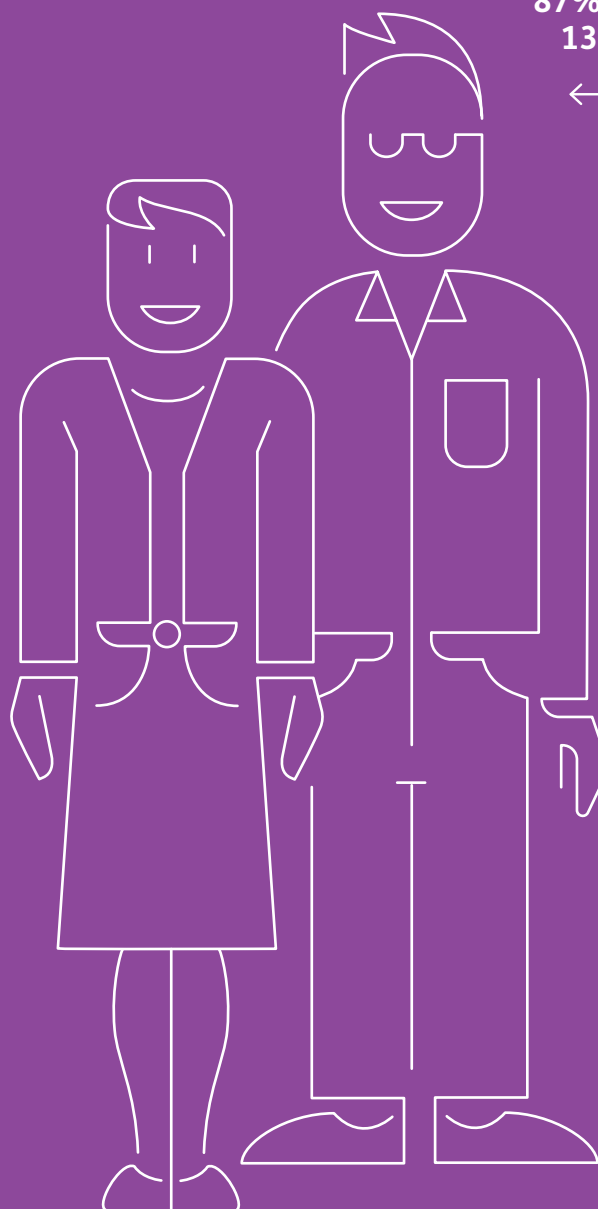
Active
Volunteers

1.3%

of our workforce identify
as Aboriginal or Torres
Strait Islander

25.7%

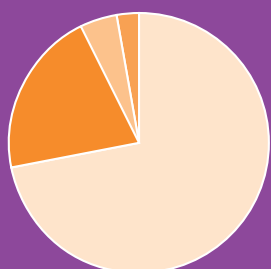
have a first
language other
than English



Volunteers

168

Active Volunteers
contributed
39,944 hours



74% Aged Care Services

15% Early Learning Services

9% Family & Community Services

2% Corporate Services



Our Supply Chain

MercyCare operates in the service sector and engages a diverse supplier base ranging from local sole traders in Western Australia to large national and multinational organisations with complex global supply chains. During the reporting period, MercyCare partnered with approximately 1,111 suppliers, with total procurement expenditure of approximately \$50.0 million.

MercyCare's consolidated annual revenue for the reporting period was approximately \$174.6 million, derived from Early Learning Services, Aged Care Services and Family and Community Services.

MercyCare's supply chain includes:

- **Direct suppliers**
Businesses that provide goods and services directly to MercyCare.
- **Distributors and wholesalers**
Third-party providers that source and distribute goods on MercyCare's behalf.
- **Subcontractors and service providers**
Entities engaged through third-party arrangements to support service delivery.

While all MercyCare suppliers are Australian-registered entities, the organisation recognises that many goods and materials are manufactured, processed or sourced internationally. These extended supply chains may involve jurisdictions and sectors with elevated modern slavery risks.

Supplier Visibility and Governance

To support greater visibility and control across its supplier base, MercyCare has strengthened its procurement governance arrangements over time. The organisation has implemented an end-to-end procure-to-pay system, providing a consistent framework for supplier onboarding, approval and purchasing activity. Since the implementation of this system in September 2025, supplier invoices issued through the platform have increasingly been supported by approved purchase orders, improving visibility of supplier engagement and spend. These arrangements enhance confidence that procurement activity is aligned with approved governance processes and support ongoing efforts to identify, assess and manage modern slavery risks within the supply chain.

CRITERION 3

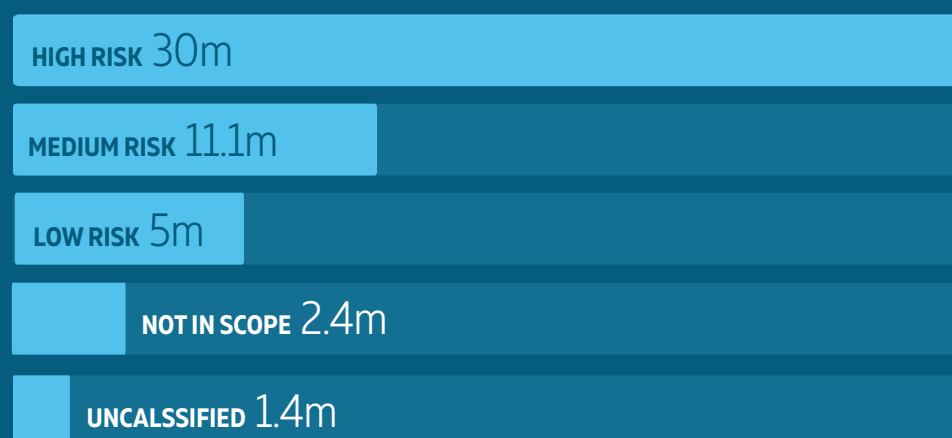
MODERN SLAVERY RISKS IN OUR OPERATIONS AND SUPPLY CHAIN

MercyCare recognises that modern slavery risks may arise across both its operations and supply chain. These risks vary depending on the nature of service delivery, labour models, supplier practices and the origin of goods and services procured. MercyCare applies a structured, risk-based approach to identifying, assessing and prioritising modern slavery risks to inform ongoing governance and supplier engagement activities.

During the reporting period, MercyCare engaged 1,111 suppliers across a range of procurement categories. While suppliers are Australian-registered entities, many goods and services are supported by extended supply chains, including internationally recognised higher-risk sectors and jurisdictions.

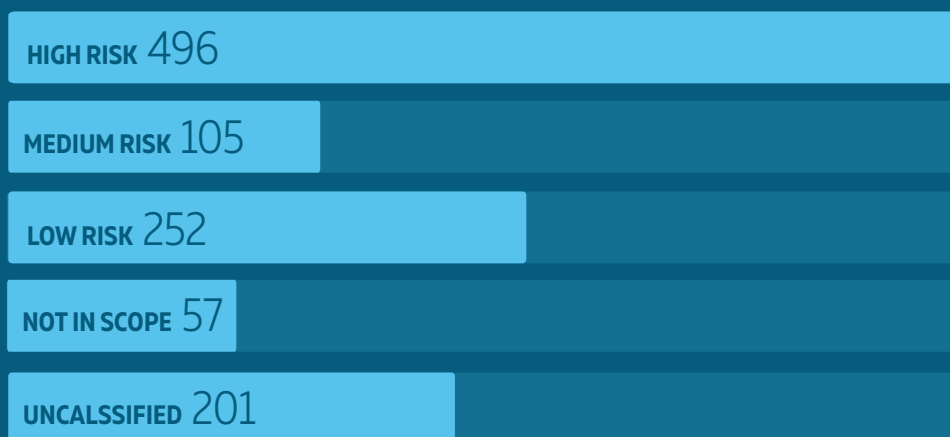
To support risk identification, MercyCare analyses supplier and spend data using the Australian Catholic Anti-Slavery Network (ACAN) Category Risk Taxonomy, which assigns inherent modern slavery risk ratings to procurement categories based on sector characteristics, labour intensity and supply-chain complexity.

Spend by Risk Category



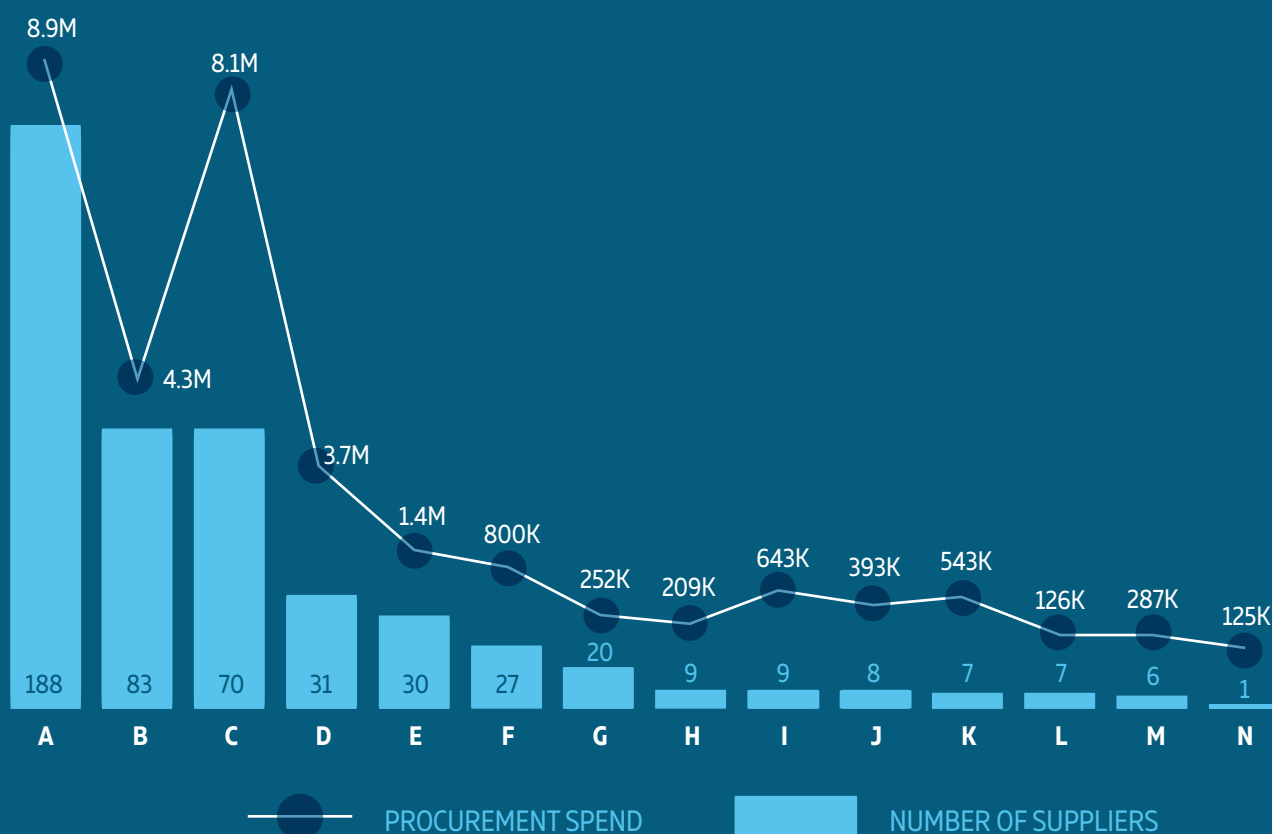
We spent
\$50m

Supplier Count by Risk



Approx.
1,111
suppliers

Spend and Supplier Count by Category



- A FACILITY MANAGEMENT AND PROPERTY MAINTENANCE
- B MEDICAL DEVICES AND SUPPLIES
- C LABOUR HIRE
- D FOOD AND CATERING SERVICES
- E BUILDING AND CONSTRUCTION
- F TRANSPORT, LOGISTICS AND WAREHOUSING
- G UNCLASSIFIED

- H FURNITURE AND OFFICE SUPPLIES
- I ICT HARDWARE
- J UNIFORMS AND PPE
- K CLEANING AND SECURITY SERVICES
- L EVENTS AND EVENT MANAGEMENT
- M WASTE MANAGEMENT SERVICES
- N LINEN, LAUNDRY AND TEXTILE PRODUCTS

Key Risk Areas in Procurement

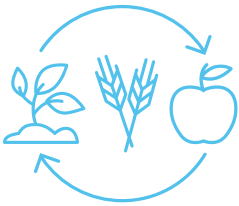
Analysis of MercyCare's procurement spend and supplier base using the ACAN Category Risk Taxonomy indicates that a proportion of modern slavery risk exposure is concentrated within a small number of inherently higher-risk procurement categories. These categories are commonly associated with elevated modern slavery risk due to labour intensity, subcontracting practices, workforce vulnerability, and complex supply chains.

Based on this analysis, MercyCare has prioritised the following procurement categories for heightened attention within its modern slavery risk management approach:



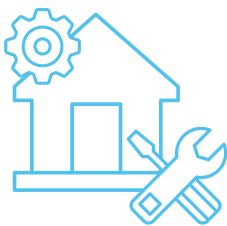
1. Facilities and Cleaning Services

Facilities maintenance and cleaning services are assessed as inherently higher risk due to reliance on labour-intensive service models, subcontracted workforces, and potentially vulnerable workers. MercyCare manages these risks through supplier governance processes, engagement with primary contractors, and oversight of employment and labour practices where services are delivered on-site.



2. Food Supply Chain

The procurement of food and catering services, including fresh produce and wholesale goods, involves extended supply chains and agricultural production sectors that are internationally recognised as posing modern slavery risks. MercyCare's approach focuses on supplier selection through established procurement frameworks, supplier transparency expectations, and alignment with baseline ethical sourcing requirements.



3. Facilities Maintenance and Construction Services

Facilities maintenance, construction, and associated trades are characterised by subcontracting arrangements and complex supply chains that may obscure labour practices. MercyCare recognises these risks and applies governance controls through procurement processes, contractor engagement, and risk-based monitoring to support responsible sourcing and transparency within these categories.

Evolving Risk Management Capability

While MercyCare does not assume the presence of modern slavery within its operations or supply chains, it recognises that inherent risk varies across procurement categories. The use of structured spend analysis and risk taxonomy enables MercyCare to prioritise resources, strengthen supplier oversight, and continuously evolve its approach to modern slavery risk management.

As procurement systems and governance processes mature, MercyCare continues to refine its ability to identify, assess and respond to modern slavery risks through improved data quality, supplier visibility and risk based prioritisation.

ACTIONS TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

During the reporting period, MercyCare continued to strengthen its approach to addressing modern slavery risks through a combination of governance controls, procurement processes, supplier engagement and targeted capability building. These actions reflect a risk-based approach informed by spend analysis, supplier profiling and ongoing system and process enhancements.

Embedding modern slavery controls in procurement practices

MercyCare has embedded modern slavery considerations into its procurement and supplier governance processes. These controls operate across sourcing, onboarding, contracting and ongoing supplier management, supporting consistent application of ethical procurement expectations.

Key measures include:

- Use of standard contractual clauses addressing modern slavery and labour standards
- Incorporation of modern slavery considerations into supplier onboarding and qualification processes
- Alignment of procurement activities with risk-based category analysis and supplier prioritisation

Building Internal Capability and Awareness

MercyCare continues to build internal capability by supporting staff awareness of modern slavery risks, particularly within roles involved in procurement, supplier engagement and governance. Awareness activities delivered in prior reporting periods inform the ongoing development of more structured and repeatable training approaches.

Where relevant, staff and supplier engagement has been supported through ACAN-facilitated resources and learning materials.

Accountability and Roles

Modern slavery risk management responsibilities are allocated across procurement, governance and operational functions. These responsibilities support oversight of supplier engagement, risk identification and escalation, and form part of broader governance and compliance arrangements.

Monitoring and Continuous Improvement

MercyCare recognises that effective modern slavery risk management requires ongoing monitoring and refinement. During the reporting period, the organisation progressed system enabled controls and governance processes to strengthen supplier visibility and improve the ability to identify and respond to risk over time.

The following case studies provide practical examples of how these controls are applied to mitigate modern slavery risks in higher-risk procurement contexts.



CASE STUDY 1

TRANSITION TO A PROCURE TO PAY SYSTEM TO STRENGTHEN SUPPLIER GOVERNANCE

In September 2025, MercyCare implemented ARM (Advanced Requisition Management), the organisation's first end to end procure to pay system. The transition from manual purchase orders and standalone invoice processing improved supplier visibility, strengthened governance controls, and established a more consistent framework for managing supplier engagement.

The implementation of ARM also supported refinement of supplier onboarding processes. Suppliers are now subject to a standardised onboarding workflow that captures core business information, approval requirements and supplier classification. This process improves the accuracy and consistency of supplier records and supports clearer oversight of active suppliers across the organisation.

While ARM does not store due diligence documentation, the updated onboarding process includes a question regarding the existence of a Modern Slavery Policy or Statement, where applicable, supporting greater visibility of

supplier governance maturity. Due diligence materials, including licences and safeguarding documentation, continue to be managed through established compliance processes.

Ahead of ARM going live, MercyCare undertook a detailed review of legacy supplier records, resulting in the deactivation of inactive or obsolete suppliers. Remaining active suppliers were required to complete updated onboarding requirements, establishing a reliable baseline for future governance and risk assessment activities.

Together, these changes strengthened supplier governance, improved data quality, and created a more robust foundation for identifying and managing modern slavery risks within procurement activities.

STEP 1



PROCUREMENT REVIEW BEGINS

Identified gaps in legacy procurement practices, supplier data quality, and visibility of risk.

STEP 2



ARM DESIGN AND CONTROL PLANNING

Defined standardised onboarding, approval workflows, and documentation controls to support compliance.

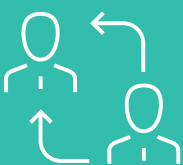
STEP 3



ARM GO-LIVE

Established MercyCare's first end-to-end procure-to-pay system as a single source truth.

STEP 4



SUPPLIER DEACTIVATION

Removed inactive and unverifiable suppliers, significantly reducing exposure to legacy and unmanaged risk.

STEP 5



RE-ONBOARDING OF ACTIVE SUPPLIERS

Required all remaining suppliers to submit current information, creating a consistent due diligence baseline.

STEP 6



FUTURE ENHANCEMENTS

Signals ongoing commitment to automation, structured risk screening, and continuous improvement.

CASE STUDY 2

ESTABLISHING LABOUR HIRE PANEL ARRANGEMENTS TO MITIGATE MODERN SLAVERY RISK

Labour hire represents a significant area of operational expenditure for MercyCare and is recognised as an inherently higher-risk procurement category due to workforce vulnerability, reliance on third-party intermediaries, and decentralised engagement models across frontline service delivery. Prior to this initiative, labour hire sourcing was managed locally across services, with limited consistency in supplier engagement, contractual arrangements or oversight of workforce practices.

To address these risks, MercyCare implemented formal labour hire panel arrangements across key service areas through an open and competitive procurement process. The resulting panels established an approved group of labour hire providers across allied health, direct care and indirect care disciplines, replacing fragmented and ad-hoc supplier engagement with a structured governance framework.

Modern slavery considerations were embedded within the panel establishment process and supplier evaluation criteria, alongside service capability and commercial factors. This included assessment of suppliers' workforce practices, compliance frameworks, and demonstrated approaches to addressing labour standards and modern slavery risks. Panel suppliers are subject

to standardised contractual arrangements incorporating expectations relating to labour practices, transparency and compliance.

A key enabler of improved governance was the integration of labour hire procurement into MercyCare's procure-to-pay system. All labour hire engagements are now required to be supported by approved purchase orders as a condition of payment. This control ensures that labour hire services are sourced only from approved panel providers, enables accurate capture and monitoring of labour hire spend, and improves transparency over supplier activity across the organisation.

The establishment of labour hire panels has strengthened MercyCare's ability to manage modern slavery risks by improving visibility of labour sourcing practices, enabling consistent due diligence across providers, and creating enforceable accountability through both contractual and system-based controls. While labour hire continues to present inherent risks, the panel model provides a more robust and controlled framework for managing exposure and supporting ethical labour practices.

MercyCare will continue to refine its labour hire governance arrangements through ongoing monitoring of panel suppliers, enhanced use of procurement data to identify potential risks, and alignment with broader supplier governance and risk management frameworks.



CRITERION 5

ASSESSING THE EFFECTIVENESS OF ACTIONS TAKEN

MercyCare assesses the effectiveness of its modern slavery risk management approach using a combination of ACAN-provided baseline data, year-on-year supplier engagement metrics, system-enabled procurement controls, and a multi-year action plan that distinguishes ongoing business-as-usual activities from targeted internal initiatives.

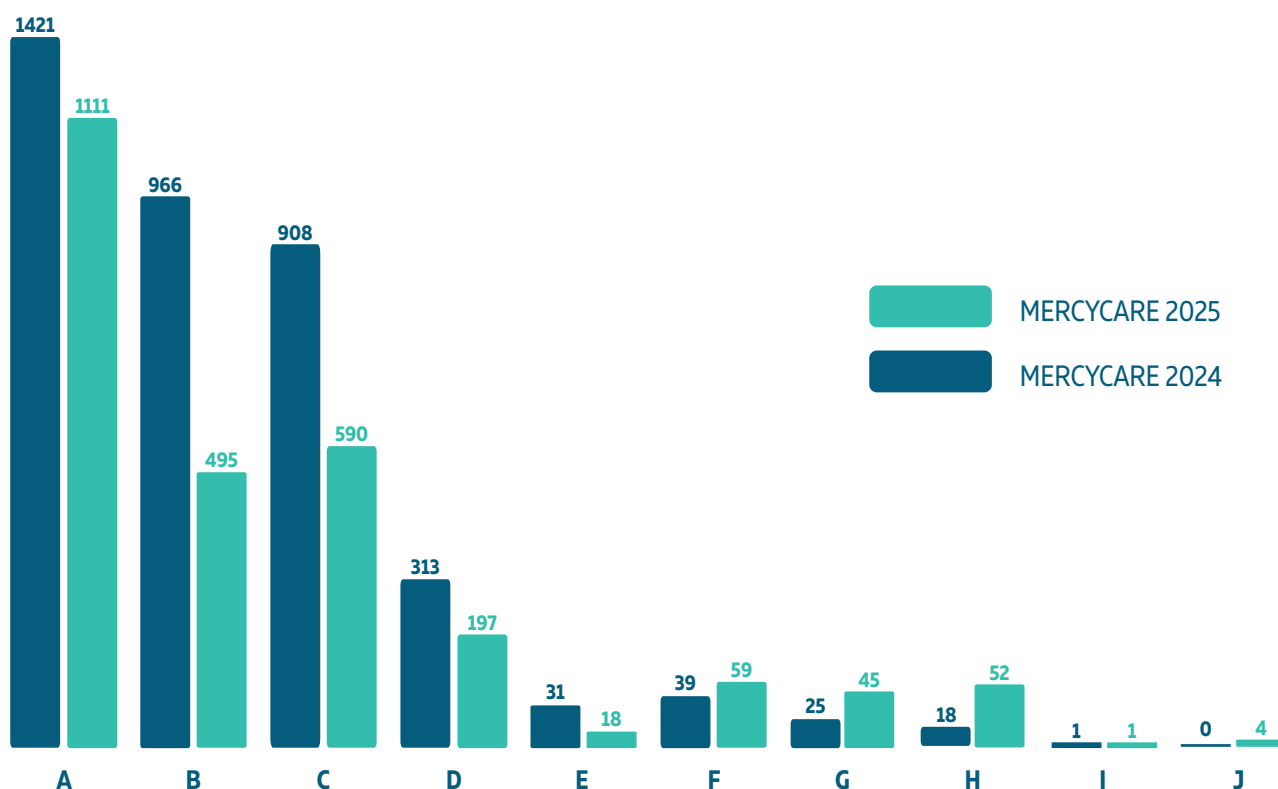
Effectiveness of Business-as-Usual Activities

Core components of MercyCare's modern slavery risk management program operate as business-as-usual activities, particularly through ongoing participation in ACAN initiatives, supplier engagement activities, and annual risk assessment using the ACAN Category Risk Taxonomy. Effectiveness is monitored using comparative engagement metrics and supplier transparency indicators, providing assurance that risk management processes are embedded within standard procurement and governance practices.

Procurement and Supplier Governance – Measuring Effectiveness

During the reporting period, MercyCare strengthened supplier governance through a combination of system-enabled controls, supplier engagement and targeted monitoring. This included the rationalisation of the supplier base, with the number of active suppliers reducing from 1,421 to 1,111, improving visibility and oversight of supplier relationships.

Supplier transparency and due diligence activities were also expanded. The number of suppliers invited to participate in the Sedex platform (a global online system for sharing data on ethical sourcing, labour standards, and supply chain risks) increased from 39 to 59, with participating suppliers rising from 25 to 45. Completion of Sedex Self-Assessment Questionnaires increased from 18 to 52, enhancing access to supplier-reported labour and ethical sourcing information. Where issues were identified, corrective actions were initiated, increasing from 0 to 4, demonstrating MercyCare's capacity to monitor and respond to risk.



- | | |
|---|--------------------------------|
| A TOTAL NUMBER OF SUPPLIERS | F INVITED TO JOIN SEDEX |
| B NUMBER OF SUPPLIERS WITH VISIBLE CONTACT INFORMATION AND ABN | G JOINED SEDEX |
| C NUMBER OF SUPPLIERS ACROSS HIGH-RISK CATEGORIES | H SEDEX SAQ COMPLETED |
| D NUMBER OF ACAN SUPPLIER SURVEYS COMPLETED | I SOCIAL AUDITS |
| E SUPPLIER STAFF ATTENDING CAPACITY BUILDING WEBINARS AND E-LEARNING | J CORRECTIVE ACTIONS |

Effectiveness of Targeted Internal Initiatives

In addition to business-as-usual controls, MercyCare has implemented targeted internal initiatives to address priority risk areas identified through spend analysis and supplier risk profiling. Initiatives such as labour hire panel arrangements and the implementation of an end-to-end procure-to-pay system have resulted in improved supplier visibility, stronger governance controls and increased confidence in ethical procurement practices.

The effectiveness of these initiatives is demonstrated through improved supplier rationalisation, increased due-diligence coverage and strengthened monitoring capability, as outlined in the case studies presented under Criterion 4.

Multi-Year Action Plan and Continuous Improvement

MercyCare's multi-year action plan provides a structured framework for measuring effectiveness over time, clearly distinguishing activities embedded as business-as-usual from targeted internal initiatives introduced to address priority risk areas. This approach supports sustainable implementation, continuous improvement, and refinement of modern slavery risk identification and management practices over a three-to-five-year horizon.

To demonstrate progression since the previous reporting period, the tables below set out key actions from the prior year alongside their current status, highlighting areas that are now embedded as business-as-usual and those that have progressed through targeted capability uplift.

CRITERION 6

CONSULTATION WITH OWNED OR CONTROLLED ENTITIES

MercyCare undertakes internal consultation in the development of this Modern Slavery Statement through engagement with key business units and operational functions across the organisation.

This consultation is facilitated through the Modern Slavery Working Group, which comprises representatives from Procurement (MSLO), the Office of the CEO, Marketing and operational functions. The group convenes in advance of the reporting cycle to review risk data, assess progress against the action plan, and support preparation of the Modern Slavery Statement.

In refining its approach to modern slavery, MercyCare has also collaborated with its advisors and the Australian Catholic Anti Slavery Network (ACAN) to support alignment with reporting obligations and leading practice.

MercyCare's Board of Directors remains committed to ensuring that the organisation fulfils its legal obligations and contributes to addressing modern slavery risks.

This approach ensures that inputs reflect operational practices, risk insights and organisational priorities, and informs both the content of this Statement and the ongoing development of MercyCare's modern slavery risk management approach.



CRITERION 7

OTHER RELEVANT INFORMATION

MercyCare has no additional relevant information to disclose for the current reporting period.



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**WHEN
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2025 Modern Slavery Statement



Southern
Cross Care WA

scrosswa.org.au



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Board Chair message

Southern Cross Care (WA) Inc. (SCCWA) is committed to our purpose of helping people live extraordinary lives, every day, connected to communities. This extends to both our employees and our suppliers.

Through this commitment we continue our journey in continuously reviewing and updating our processes to ensure our organisation and its supply chains' activities and actions are compliant with the Modern Slavery Act 2018 (Cth) and free from Modern Slavery practices.

Our purpose and values of **I listen, I act, I don't give up, and we work as one** remain visible throughout this statement and in the actions we continue to take. We persist in laying foundations which reflect our commitment to taking meaningful action and acting with integrity to support vulnerable members of our community.

The introduction of the Vendor and Supplier Compliance Framework and communicating these changes with over 650 of our vendors demonstrates our commitment to include key stakeholders on our journey of continuous improvement and to eradicate modern slavery.

This statement is made together with other Australian Catholic organisations. SCCWA is pleased to be a part of the Australian Catholic Anti-Slavery Network (ACAN), and for our Modern Slavery Statement to form part of the ACAN's Compendium of Modern Slavery Statements.

As Chair of SCCWA, I would like to thank everyone who has helped develop this important work, from discerning the issue and our commitment to action to delivering the final statement.

I look forward to leading and supporting our ongoing efforts to eliminate modern slavery.



Tony Vis
Board Chair
Southern Cross Care (WA) Inc.



Criteria 1:

About Southern Cross Care (WA) Inc

In 1966, Southern Cross Care WA (SCCWA), formerly known as Southern Cross Homes, was created by the Order of the Knights of the Southern Cross, who were committed to improving the lives of their fellow Western Australians.

Today, 60 years on, that commitment remains strong, and SCCWA remains a purpose-driven, not-for-profit organisation, providing residential aged care, retirement living, respite, home-based care, health and wellness services, mental health and disability support, and social housing through Southern Cross Housing.

At SCCWA our people are at the heart of everything we do, and we are proud to deliver care to over 3,000 Western Australians. With more than 1,000 employees and 170 volunteers, our teams dedicate their days to helping people live extraordinary lives, every day, connected to communities.

Our purpose

People live extraordinary lives, every day, connected to communities.

Our vision

Transforming our sector and the experiences of the people we care about.

Our values

Our values guide how we live and work, day-to-day. They define how we behave towards each other and the attributes we recognise and celebrate. Our values take the normal to memorable and set a shared standard for how we care for others, now and in the years to come.

All of our people operate from a core belief that “I enable the extraordinary because”:



I listen



I act



I don't give up



We work as one

This is our promise to our clients, residents and each other.

Criteria 2:

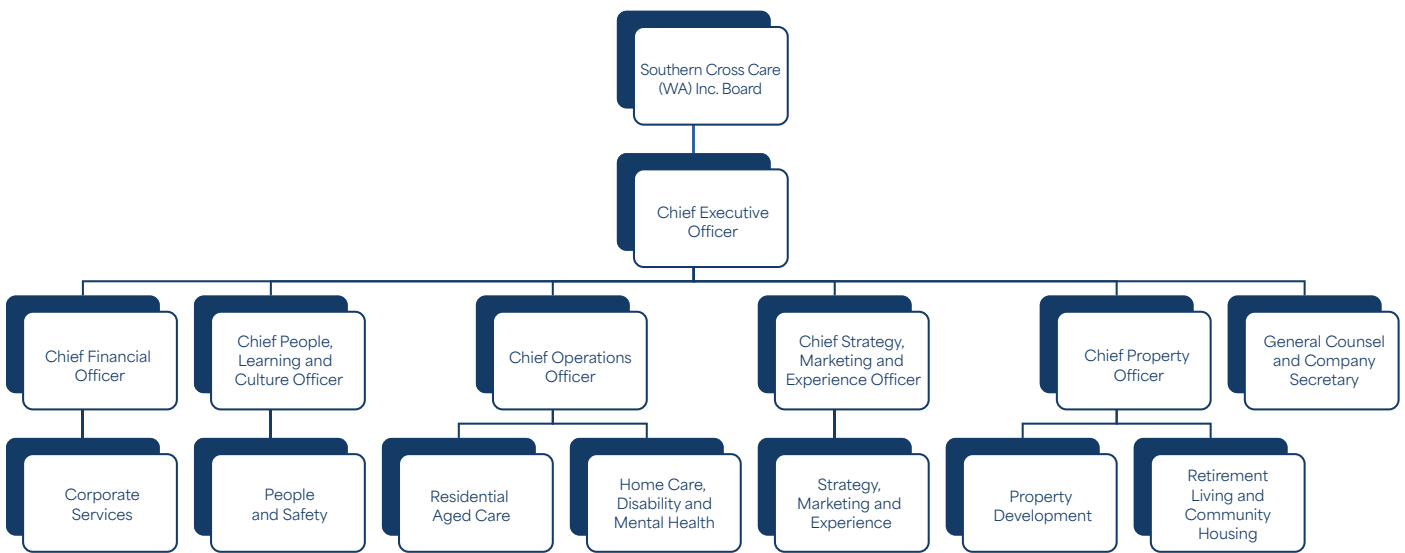
Structure, operations and supply chains

Structure

SCCWA is a mission-driven aged care and community services provider with a governance and leadership structure designed to ensure accountability, strategic direction, and high-quality service delivery. The organisation is an incorporated association governed by a Board with extensive experience across corporate, health, disability, aged care, insurance, property, and public service sectors.

The Board work alongside the Executive team to provide governance and strategic leadership to ensure SCCWA remains true to its vision of transforming our sector and the experience of the people we care about.

In FY2025/26, SCCWA's annual revenue was \$147.4m with expenses of \$133.3m. The Modern Slavery Statement is for calendar year 2025.




1,127
Direct employees


120
Active volunteers

Our People

1,127 people directly worked for SCCWA in 2025, 85 per cent were women.

Workforce profile

Category	No.
Direct Female Employees	954
Direct Male Employees	173
Direct Permanent Employees	922
Direct Fixed Term/Temporary Employees	205

Employees with visas are managed by our in-house team in accordance with our Employee Records Policy, and in compliance with immigration requirements under Australian law.

SCCWA has completed a large body of work to consolidate all of its employee enterprise agreements under one organisational agreement. This ensures all employment conditions are simpler and more consistently applied.

Some employees are engaged through agency and other labour hire arrangements. SCCWA has a range of systems in place to identify and action changes to employment entitlements, immigration requirements, equal opportunity requirements, and health and safety legislation. During 2025, 205 people were employed through temporary and fixed-term arrangements.

Our operational sites



Residential aged care

SCCWA has eight residential aged care homes with 489 beds throughout metropolitan Perth and regional WA, providing 24/7 clinical and personal care while prioritising the dignity and personal choices of our residents. Our homes in Rossmoyne and Success also accommodate eight-bed transition units for residents requiring mental health care in High Dependency Units (HDU). In addition to residential aged care, Villa Pelletier in West Leederville supports people aged over 65 who have health needs and are experiencing homelessness or insecure tenancy, through our Housing the Homeless program.



Retirement living

Our seven retirement villages with 510 villas in the Perth metropolitan area offer a sense of safety, security, and community where residents can enjoy their independence and make the most of their retirement.



Mental health services and support

SCCWA offers a broad range of mental health services for our 202 clients and their carers. We support adults aged between 18 and 65 who have a diagnosed mental illness or are experiencing mental health concerns. We offer various support services in three residential settings and in the community, through community mental health and Family and Carer Support programs.



Pastoral care

Our pastoral carers are trained to listen and help residents and their families make sense of the changes that are occurring and provide support during challenging times. The team deliver pastoral care across residential aged care, retirement living, and home care services. They also deliver the 'Connect the 40%' program and the No One Dies Alone (NODA) program.



Home care

Our home care services include government-funded care via Home Care Packages (HCP), the Commonwealth Home Support Program (CHSP), Short-Term Restorative Care (STRC) Program and the Community Transition Care Program (CTCP). The HCP program changed to Support at Home on 1 November 2025. We provide home care services to 2,018 clients across the Perth metropolitan area, Broome townsite and within a 30km radius of Bunbury and Busselton.



Disability support

SCCWA is a registered provider under the National Disability Insurance Scheme (NDIS). Our disability services provide opportunities for 39 people living with a disability to increase participation in all aspects of community life.



Respite care

Our respite services include a range of flexible, day or overnight respite options, either in-home, at one of our dedicated respite centres in Forrestfield or Hilton, or short-term in one of our residential aged care homes.



Health and Wellness Centre

Our Health and Wellness Centre in East Fremantle offers specialised exercise and rehabilitation services for people aged over 55. The centre, which is co-located with our residential aged care home SCCWA, East Fremantle, provides a range of services including rehabilitation physiotherapy, exercise physiology, gym sessions, hydrotherapy, and group classes, and is available to the public with a GP referral.



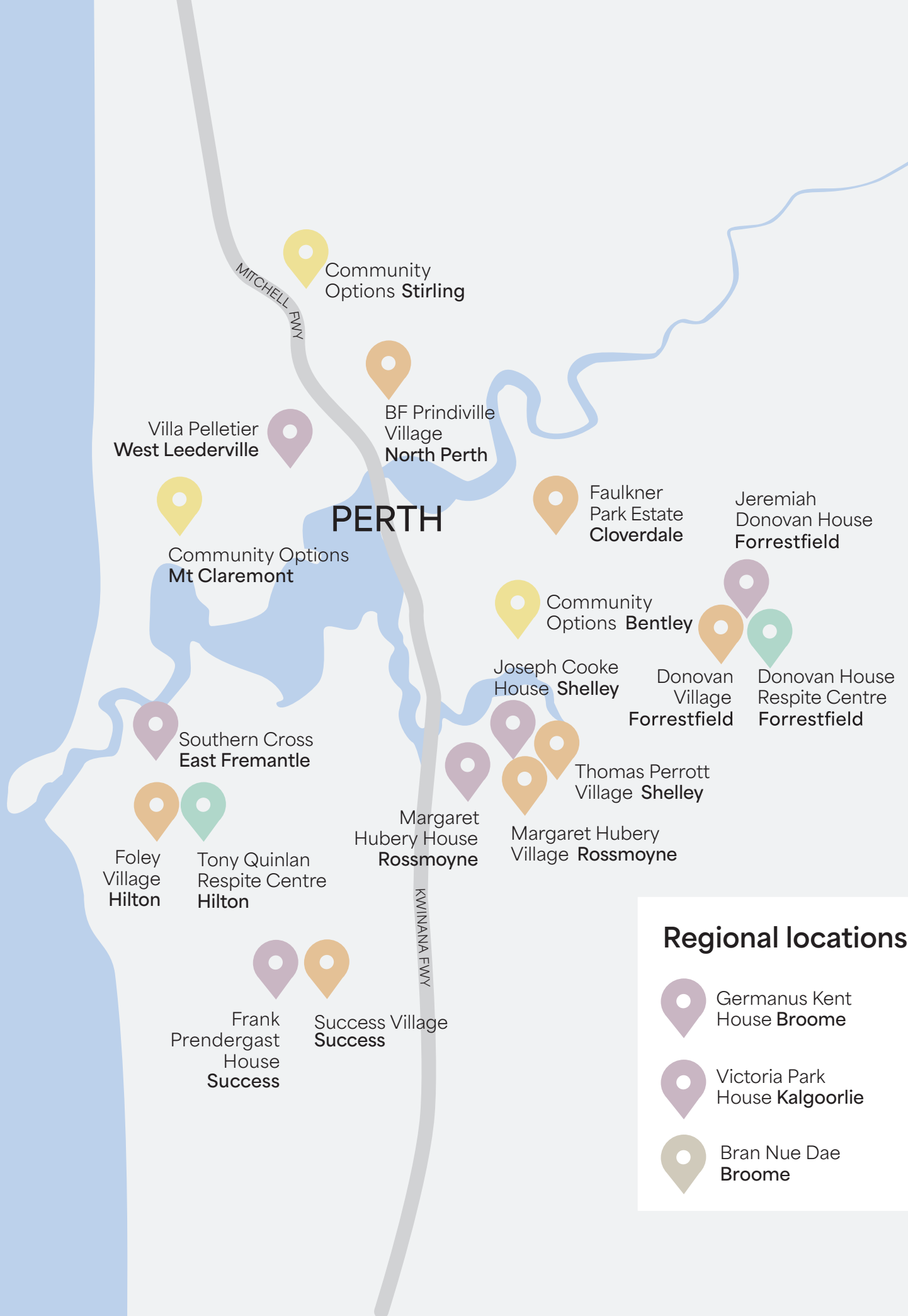
Southern Cross Housing

Southern Cross Housing Ltd (SCH) offers affordable community housing to people aged over 55 or younger people living with mental illness or disability. SCH provides 358 properties across 39 suburbs in Perth, ranging from the City of Joondalup in the north to the City of Rockingham in the south and out to the City of Swan in the east.



Central Office

SCCWA's Central Office is located in Rivervale, with all corporate and operational support teams for both SCCWA and SCH.



Supply chain

To deliver a wide range and scope of care, SCCWA relies on products, goods and services including:

- Medical and related services, such as allied health services and agency staff.
- Building, construction and infrastructure services, including waste management and property development.
- Ancillary services such as food, cleaning, linen and laundry, and security.
- Communications, information technology and support, and software solutions and support.

SCCWA predominantly buys from suppliers with an Australian presence.

However, given the specialist nature of the services we provide, many of our providers are international suppliers with head offices based all around the world.

Modern Slavery Working Group

The Modern Slavery Working Group (MSWG) was established in July 2024 and is responsible for facilitating the SCCWA's response to modern slavery legislative requirements, utilising the support and resources developed by the Australian Catholic Anti-Slavery Network (ACAN).

The MSWG is chaired by the Chief Financial Officer (CFO) and meets quarterly to review adherence with the Modern Slavery three-year Action Plan. Other members of the MSWG include the Company Secretary & General Counsel, Senior Manager Risk and Assurance, People Business Partner and the Procurement and Contract Manager.

This working group regularly informs and advises the SCCWA Executive Leadership Team on modern slavery related issues and is responsible for monitoring, managing and mitigating modern slavery risks across SCCWA.

The Executive Leadership Team informs the SCCWA Board of progress in compliance with the Act, in line with the SCCWA Board Work Plan.

Criteria 3:

Modern Slavery risks in our operations and supply chain

Operational risk

This year SCCWA has developed and implemented a Vendor and Supplier Compliance Framework categorising vendors and suppliers against multiple risk criteria and then providing compliance requirements to these categories. One of the risk criteria is the legislative compliance requirement of the work undertaken, which includes a Modern Slavery risk assessment.

SCCWA has a Code of Conduct governing how employees conduct themselves in our organisation's operations. This has been further strengthened through the implementation of the Fraud Protection Policy and updates to the Whistleblower Policy.

SCCWA does not tolerate improper conduct by our employees, officers, or volunteers, and we are committed to protecting and supporting whistleblowers who disclose improper conduct.

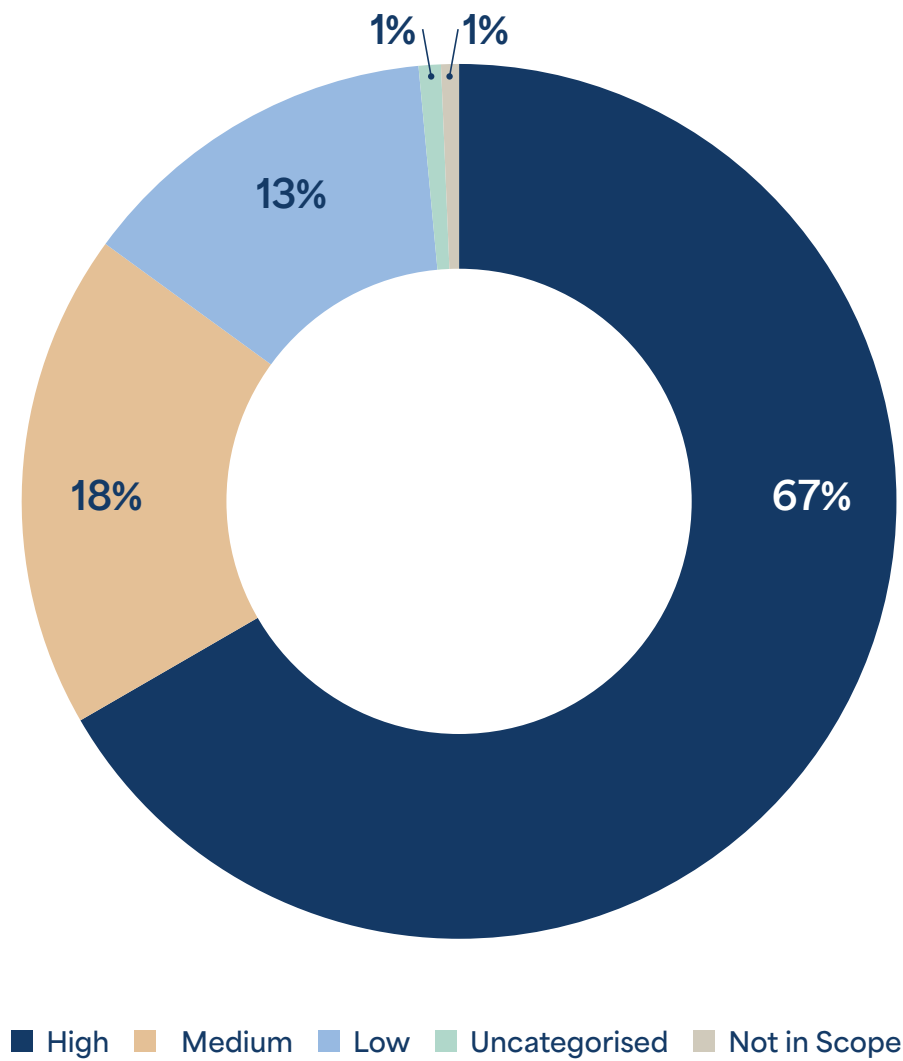
Supply chain risks

In 2025 SCCWA undertook a risk analysis of our suppliers based on spend with the support of ACAN. Over the last 12 months, SCCWA has focused on consolidating its vendor and supplier base to support operational efficiencies and to reduce risk exposure within high-risk procurement categories.

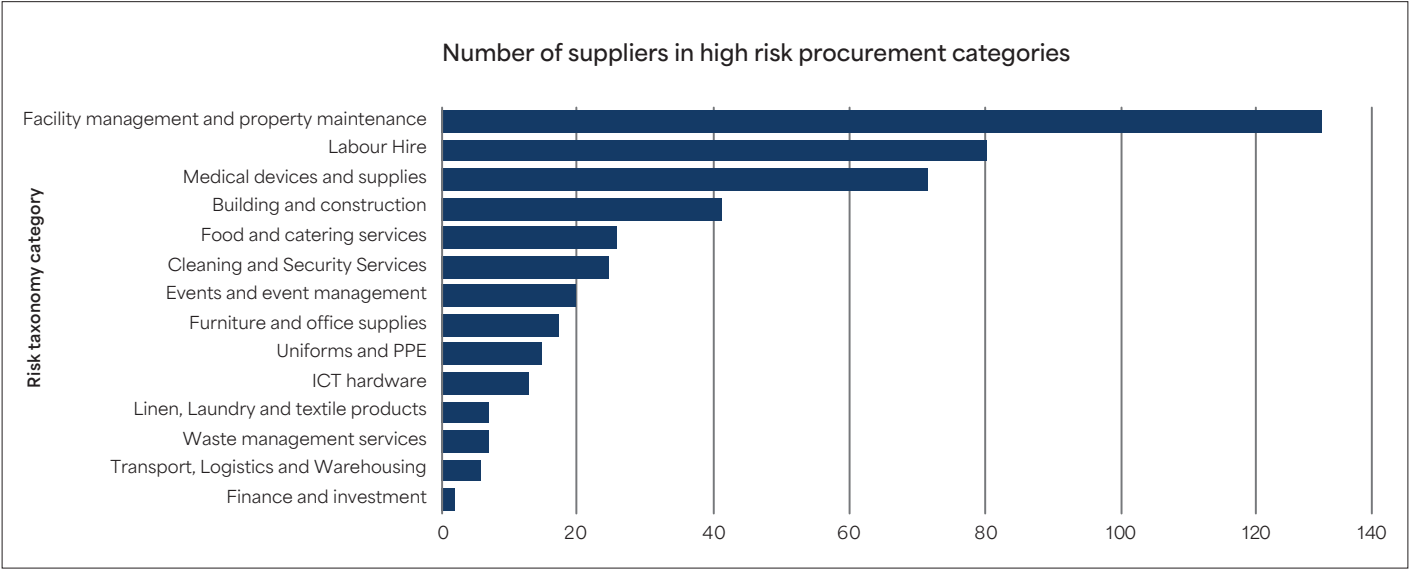
The resulting risk dashboard identified 67% of SCCWA's spend was within high-risk spend categories. This is an increase from 2024 however 99% of all SCCWA's spend is now categorised within the ACAN risk taxonomy.

The number of high-risk vendors has reduced from 471 to 461, which is a significant achievement considering the support these vendor categories provide SCCWA in achieving its organisational goals and objectives.

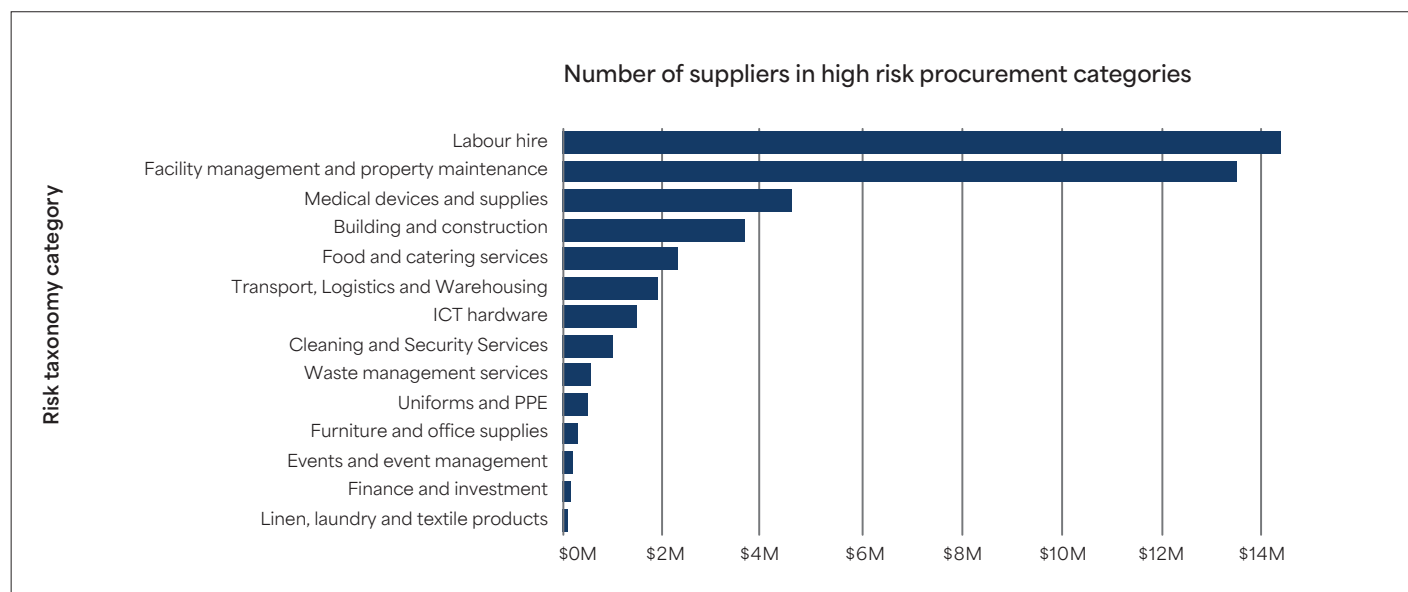
Total spend per taxonomy category risk



The high-risk spend categories are detailed below in the bar chart and table. These procurement categories have an increased risk of Modern Slavery work practices. The graph and table demonstrate the majority of SCCWA’s modern slavery risk sits within the facility management and property maintenance category.



Risk taxonomy category	Number of suppliers
Linen, laundry and textile products	7
Finance and investment	2
Events and event management	20
Furniture and office supplies	17
Uniforms and PPE	15
Waste management services	7
Cleaning and security services	25
ICT hardware	13
Transport, logistics and warehousing	6
Food and catering services	26
Building and construction	41
Medical devices and supplies	72
Facility management and property maintenance	131
Labour Hire	80
Total	461



Risk taxonomy category	Spend
Linen, laundry and textile products	\$89,112
Finance and investment	\$149,359
Events and event management	\$184,240
Furniture and office supplies	\$295,160
Uniforms and PPE	\$513,256
Waste management services	\$565,361
Cleaning and security services	\$1,025,347
ICT hardware	\$1,492,354
Transport, logistics and warehousing	\$1,907,124
Food and catering services	\$2,326,174
Building and construction	\$3,655,506
Medical devices and supplies	\$4,593,696
Facility management and property maintenance	\$13,543,279
Labour Hire	\$14,456,683
Total	\$44,796,651

Criteria 4:

Actions taken to assess and address the risks

Modern Slavery Working Group

The MSWG was established in 2024, and a Modern Slavery Liaison Officer (MSLO) was appointed to work with the ACAN to support and enhance SCCWA's responses to the risks of modern slavery.

Working in conjunction with the ACAN and under the supervision of the MSWG, the following goals have been achieved in 2025:

- Led the development and implementation of the Vendor and Supplier Compliance Framework.
- Coordinated a presentation by ACAN to the SCCWA Board and Executive.
- Updated and reviewed the SCCWA Risk Register to ensure Modern Slavery Risks were identified.
- Identified the top 50 high risk vendors and suppliers who support SCCWA.
- Reviewed and updated workforce employment and recruitment policies and procedures.
- Created an ongoing communications plan for Modern Slavery Working Group activity.
- Contacted all suppliers and informed them of the new compliance framework and Modern Slavery monitoring activities.

The MSWG continues to work through its 2024-2026 work plan and will continue to implement controls, mitigations and processes to strengthen its approach to eradicating modern slavery risk within its business processes.

Australian Catholic Anti-Slavery Network (ACAN)

In 2024, SCCWA joined the ACAN, comprising of more than 50 Catholic organisations around Australia, including large Catholic health and aged care providers.

The SCCWA Modern Slavery Liaison Officer (MSLO) attended ACAN conferences and monthly meetings with the purpose of understanding and responding to the potential risks of modern slavery at SCCWA and the organisation's supply chain.

SCCWA completed the ACAN assessment for 2025 within the Sedex platform, which is a new feature of the ACAN membership for 2025. Sedex is a global company specialising in reviewing the data and insights for supply chain networks.

The assessment undertaken within Sedex determines a risk score for organisations against business and supply chains across 180 countries and 35 sectors globally. Through this assessment, insights are presented into the risks faced by the organisation's operations and management controls.

The Sedex assessment identified SCCWA has strong governance frameworks and processes in place, which include adequate risk assessment of business activities. SCCWA received a combined risk score of 5.9/10, which is a medium risk score.

The combined risk score merges the inherent risk score of the sector and geographical location of the organisation, with the site characteristics of the type of work conducted. This is then adjusted based on the management controls in place within the organisation.

SCCWA has worked with ACAN to develop our organisational commitment, internal education and training, procedural and policy resources, and other business systems.

Education and awareness

The SCCWA Board and Executive Management Team were provided a presentation and overview training by ACAN on the risks of modern slavery and effective supplier engagement and remediation.

Roles within SCCWA with high touch points with vendors and employees at risk will access online learning in 2026. This progressive approach to training and education is in line with the three-year work plan.

Criteria 5:

Effectiveness assessment

The MSWG meet quarterly and review the effectiveness of the actions SCCWA are taking in addressing the risk of modern slavery in our operations and supply chain. The Modern Slavery Three-Year Action Plan will be implemented and reviewed annually.

The table below provides an overview of the effectiveness of risk mitigation activities implemented by SCCWA. This effectiveness has been independently reviewed by ACAN through their annual maturity assessment.

	Activity	2024	2025
Internal / staff	Hours spent on modern slavery activities	140	180
	Individual staff completed e-learning	5	5
	E-learning modules completed	5	5
External / supplier engagement	Total number of suppliers	835	825
	Number of suppliers with visible contact information and ABN	224	812
	Number of suppliers across high-risk categories	472	461
	Number of ACAN Supplier Surveys completed	62	151
	Supplier staff attending capacity building webinars	17	17
	Invited to join Sedex	16	32
	Joined Sedex	23	37
	Sedex SAQ completed	0	46
	Social audits	0	2
	Corrective actions	0	10
External referrals	Contacts made via worker voice / grievance mechanism	0	0
	Referrals for advice and assistance	0	0
	Individuals identified or referred for modern slavery assessment	0	0
	Individuals with modern slavery cases remediated	0	0

Action plan

The MSWG continues to work through its 2024-2026 work plan and will continue to implement controls, mitigations and processes to strengthen its approach to eradicating modern slavery risk within its business processes.

Criteria 6:

Consultation with owned and controlled entities

SCCWA provides all support and resourcing to Southern Cross Housing Ltd (SCH). This is managed through an intercompany agreement that has been agreed by the SCCWA and SCH Boards.

Criteria 7:

Any other relevant information

No other relevant information.

Approval

This Modern Slavery Statement was approved by the principal governing body of Southern Cross Care (WA) Inc., as defined by the Modern Slavery Act 2018 (Cth) ("the Act") on 18 June 2026.

This Modern Slavery Statement is signed by a responsible member of Southern Cross Care (WA) Inc. as defined by the Act.



Tony Vis
Board Chair
Southern Cross Care (WA) Inc.



**Upholding
human dignity.**



**Leading with
integrity.**

**Australian Catholic
University**
**2025 Modern
Slavery Statement**

1 January – 31 December 2025

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Disclosure note

This statement has been made on behalf of Australian Catholic University.

This statement covers all entities owned or controlled by ACU.

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Statement from Vice-Chancellor and President Professor Zlatko Skrbis

Australian Catholic University is pleased to submit its sixth annual Modern Slavery Statement to the Australian Government as part of the 2025 Australian Catholic Anti-Slavery Network (ACAN) Compendium of Modern Slavery Statements. This Statement reflects ACU's enduring commitment, as a Catholic university, to upholding the inherent dignity of every person and to acting in solidarity with those most vulnerable to exploitation.

During the reporting period, ACU has continued to strengthen its approach to identifying, assessing and addressing modern slavery risks across

its operations and supply chains. Our risk management arrangements have been further embedded across the university, reinforcing our commitment to transparency, accountability and continuous improvement in line with both legislative expectations and our institutional values.

I commend the sustained efforts of ACU's modern slavery working group, whose leadership and diligence ensure that our response is not merely compliant, but purposeful and forward looking. Their work aligns closely with the strengthened national direction articulated by the Commonwealth Anti-Slavery Commissioner.

I am also pleased to have continued serving on the Advisory Committee of the Domus 8.7 Modern Slavery Remediation Service throughout the reporting period.

Through this Statement, ACU reaffirms its mission led commitment to ethical conduct, responsible stewardship and the pursuit of the common good. In doing so, we seek not only to strengthen our own practices, but to model the values we instil in our students as future leaders; values grounded in justice, compassion and a shared responsibility to eliminate modern slavery in all its forms.

Statement, approval and signature from Chancellor The Honourable Martin Daubney AM KC

As a Catholic university, we are guided by an unwavering commitment to the dignity of every person. This commitment calls us not only to speak about justice, but to act decisively in its pursuit.

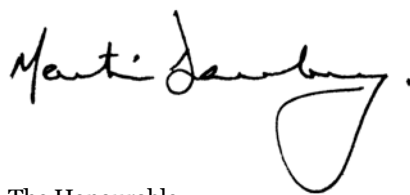
At ACU, we seek to form graduates who understand that leadership carries responsibility – to challenge injustice, to act with integrity, and to contribute meaningfully to a more

humane and equitable world. Our approach to governance and decision-making reflects this responsibility, demonstrating that ethical leadership is not abstract, but lived through the choices we make every day.

Modern slavery stands in direct opposition to the values we uphold. It is a profound violation of human dignity that demands sustained, collective action.

In this context, we reaffirm our commitment to transparency, accountability and continuous improvement, and to playing an active and principled role in the global effort to eradicate modern slavery. Through our actions, we aim not only to reduce risk within our own operations and supply chains, but to contribute to broader systemic change – in solidarity with those most vulnerable.

This Modern Slavery Statement was approved by the principal governing body of Australian Catholic University as defined by the Modern Slavery Act 2018 (Cth) ("the Act") on 17 June 2026. This Modern Slavery Statement is signed by a responsible member of Australian Catholic University as defined by the Act.



The Honourable
Martin Daubney AM KC
Chancellor
Signed: 17 June 2026



Professor Zlatko Skrbis
Vice Chancellor and President
Signed: 17 June 2026

Criterion 1: About Australian Catholic University (ACU)

An ACU education is grounded in the Catholic understanding of faith and reason working together in the pursuit of knowledge, promotion of human dignity, and advancement of the common good.

We aim to transform lives and communities. Students are challenged to look beyond the classroom, solve real-world problems, develop their own search for meaning and cultivate strong professional ethics. They are invited to stand up for people in need and causes that matter.

Opportunities for personal and professional growth are critical to ACU. This is a university of service – so much so that it is built into the curricula. All ACU courses offer work placements, internships or volunteering opportunities.

High-impact research – with social, cultural and economic benefits – is core to our institution. Our research and enterprise activities develop innovative solutions to issues impacting human dignity and the common good. Through ethically informed research we deliver positive change across ACU, industry, community and government.

We foster academic collaboration and engage with local and international partners to enable the exchange of knowledge and skills and develop dynamic educational and research initiatives. We build healthy social partnerships, assisting communities in actively shaping initiatives that directly impact them. ACU is a university for everyone. Like all Catholic institutions, the university is inclusive and supportive of everyone, every day – regardless of their faith, tradition or circumstance.

ACU is a young university making a significant impact. Ranked in the top 10 Catholic universities*, and ranked first in Australia and sixth globally for good health and wellbeing (SDG 3)**, we're also a leader in employability, with 95 per cent of our graduates employed***. The university has seven campuses around Australia, a campus in Rome, Italy, and an online campus – ACU Online.

ACU's 2025 annual consolidated revenue is \$703.7m.

* International Federation of Catholic Universities members ranked on Times Higher Education *World University Rankings 2026*

** Times Higher Education *Impact Rankings 2025*, based on United Nations Sustainable Development Goals (SDGs)

*** *Graduate Outcomes Survey – Longitudinal 2024*, overall employment for domestic undergraduate students and domestic postgraduate coursework students in the labour force



ACU mission

Within the Catholic intellectual tradition and acting in truth and love, Australian Catholic University is committed to the pursuit of knowledge, the dignity of the human person and the common good.

Our values

Truth

ACU is a place where faith and reason are explored in search of truth.

Excellence

The pursuit of excellence underpins our efforts in teaching, research and engagement.

Service

ACU is a university of service. We seek to improve the lives of others through compassion, empathy and respect.

Our vision

Our vision is to enable flourishing lives, foster thriving communities and build an ethical future.

Criterion 2:

ACU's structure, operations and supply chains

Our structure and governance framework

ACU's annual modern slavery statements are compiled with contributions, information, figures and updates from across the University's directorates and faculties, as well as from external organisations such as Sedex, other ACU partners, and selected ACU suppliers. Consultation also takes place with the Australasian Universities Procurement Network (AUPN), the Australian Catholic Anti-Slavery Network (ACAN) and ACU's Eradicating Modern Slavery (EMS) Working Group.

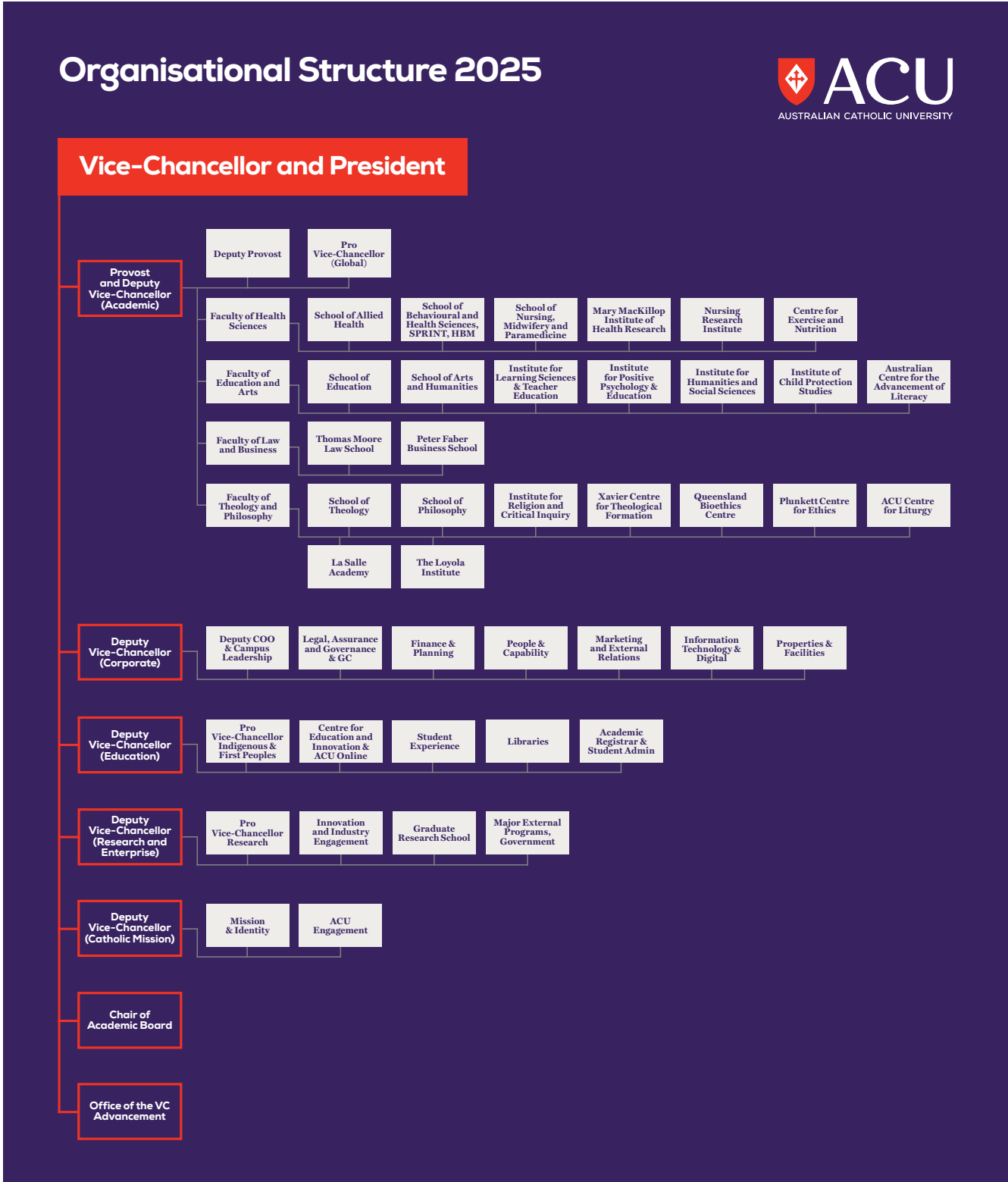
The EMS Working Group is chaired by the Deputy Vice-Chancellor (Catholic Mission) and comprises members of the ACU senior executive, other key ACU personnel and ACAN program managers. It was established in 2020. Its remit is to look at further eradicating modern slavery and human trafficking risks in ACU's operations, policies, procedures, supply chains, business partnerships and employment, and to raise anti-slavery consciousness across the whole university. More detailed information about its role and objectives can be found under Criterion 4.

ACU's anti-modern slavery initiatives and annual statements are incorporated into ACU's governance structure. The statements undergo a stringent endorsement and approvals process, supported by clear governance and accountability arrangements. After compilation, statements are reviewed and endorsed by the Chief Financial Officer and Deputy Vice-Chancellor (Corporate), and then presented to the Vice Chancellor's Management Committee (VCMC). Once endorsement is received from VCMC, the statements proceed to ACU's Finance and Resources Committee for review and recommendation to ACU's Senate for its approval. The approved statement is then submitted to the Australian Government via the Australian Catholic Anti-Slavery Network (ACAN) Compendium and added on ACU's Eradicating Modern Slavery and Human Trafficking page.

ACU's 2025 organisational structure diagram, governance framework and governance structure diagram are provided below.



This diagram represents ACU's organisational structure at the end of 2025.



Our governance framework

Our key leaders and governance bodies are as follows:

CORPORATION

ACU is a public company. The Corporation, as enshrined in our constitution, is responsible for maintaining a university that adheres to the Catholic faith and is committed to the pursuit of truth through academic enquiry.

SENATE

The Senate is ACU's chief governing authority. Its members' roles include managing the budget, creating policy, overseeing university operations, and ensuring adequate risk management procedures are implemented and followed. ACU's Chancellor and Pro-Chancellor head up our Senate and ensure ACU is governed in accordance with our constitution.

CHANCELLOR

ACU's Chancellor chairs the Senate, the chief governing authority of ACU.

PRO-CHANCELLOR

The Pro-Chancellor sits on the Senate, acts as deputy to the Chancellor, and chairs the Finance and Resources Committee

VICE-CHANCELLOR AND PRESIDENT

The Vice-Chancellor and President is the chief executive officer of ACU, representing the university both nationally and internationally, and providing strategic leadership and oversight of the operational management of the university.

PROVOST AND DEPUTY VICE-CHANCELLOR (ACADEMIC)

The Provost and Deputy Vice-Chancellor (Academic) is responsible for the Academic Portfolio: ensuring academic quality is maintained, overseeing the faculties and providing the operational delivery of ACU's academic programs.

DEPUTY VICE-CHANCELLOR (CORPORATE)

The Deputy Vice-Chancellor (Corporate) is responsible for the Corporate Portfolio ensuring the delivery of critical functions that enable the university to fulfil its mission and build the capabilities required for long-term growth and impact. This

portfolio covers a broad range of areas including people and capability, finance and planning, properties and facilities, information technology, legal assurance and governance, marketing and external relations, and campus leadership.

DEPUTY VICE-CHANCELLOR (EDUCATION)

The Deputy Vice-Chancellor (Education) leads the Education Portfolio. Aligned with ACU's mission, the Education Portfolio makes a major contribution to the Catholic commitment to education. The portfolio prides itself on placing the whole person at the centre of its strategies and working to deliver the best possible experience and outcomes to our students. Student wellbeing and sense of belonging are key to the portfolio's engagement.

DEPUTY VICE-CHANCELLOR (RESEARCH AND ENTERPRISE)

The Deputy Vice-Chancellor (Research and Enterprise) oversees ACU's research and innovation strategy, external engagement strategy and approaches to securing external research investment, advancing the university's reputation as a leading research institution with close links to industry and government.

DEPUTY VICE-CHANCELLOR (CATHOLIC MISSION)

The Deputy Vice-Chancellor (Catholic Mission) is responsible for nurturing and advancing the university's Catholic mission and identity across the university. The Mission Portfolio seeks to enrich the university's academic and communal life by drawing on the Catholic intellectual tradition and promoting dialogue between Christian faith and contemporary culture.

THE ACADEMIC BOARD

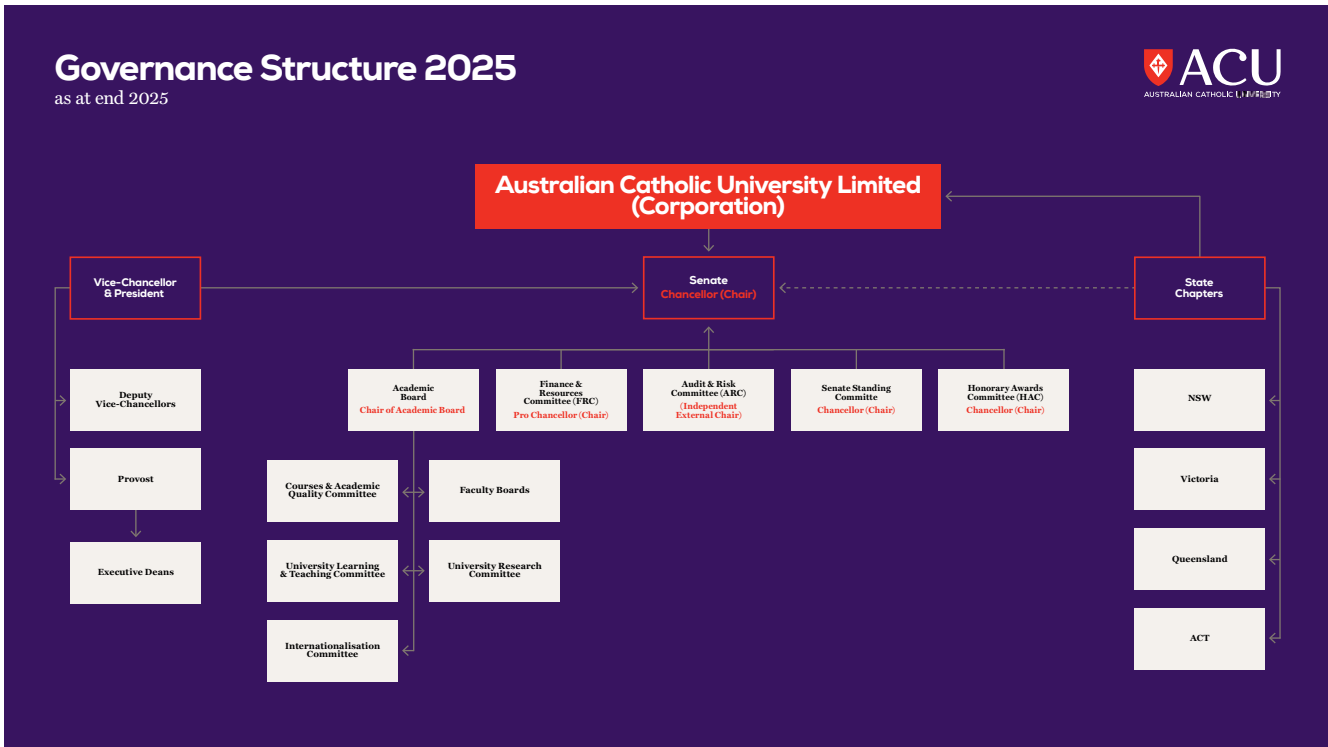
The Academic Board reports to the Senate and is responsible for all academic matters, including conducting quality assurance, developing academic policy, recommending new courses to the Senate and initiating course reviews.

THE VICE-CHANCELLOR'S ADVISORY COMMITTEE

The Vice-Chancellor's Advisory Committee (VCAC) is the university's principal management committee. It is an advisory forum providing advice on matters of strategic importance to the Vice-Chancellor and President.

ACU's governance structure

Below is a visual representation of ACU's governance structure as of the end of 2025. ACU's Legal, Assurance and Governance Directorate maintains a suite of policies and procedures which relate to the conduct, decision-making, risk management, internal organisation and management of the university.



Our operations

ACU is a publicly funded university with four primary faculties – education and arts, health sciences, law and business, and theology and philosophy – as well as a research and enterprise portfolio, an education portfolio and a corporate services division, made up of directorates, including: Legal, Assurance and Governance; Properties and Facilities; People and Capability; Finance and Planning; and Marketing and External Relations.

ACU has seven Australian campuses – Ballarat, Blacktown, Brisbane, Canberra, Melbourne, North Sydney and Strathfield – with one international campus in Rome, and a leadership centre in Townsville.

Some key information (2025):

- approximately 2,460 (FTE) staff
- approximately 35,100 students
- more than 152,000 alumni
- approximately 5,560 international students enrolled:

International enrolments by region

The Americas	154
Europe	175
Africa and the Middle East	412
Asia Pacific	4,815

- more than 190 international partners (including research and cotutelle arrangements)
- 324 ACU students studied at our Rome Campus in 2025.



Our Strategic Plan – Vision 2033

ACU Vision 2033 sets the strategic direction for the university. Modern slavery is identified as an important objective in ACU's strategic planning and is included under a number of focus areas in ACU's Vision 2033.

Our vision

As a leading Catholic university, we will enable flourishing lives, foster thriving communities and forge an ethical future.



Flourishing lives

To flourish, individuals require intellectual growth, a sense of wellbeing and moral purpose. This enables them to find fulfilment in their personal and professional lives.



Thriving communities

Thriving communities are healthy, secure and inclusive. They nurture social connection and provide opportunities for all.



Ethical future

An ethical future is one that promotes human dignity and the common good above all other considerations.

Vision 2033's focus areas guide us in achieving our ambitions and assist us in setting our operational objectives. The focus areas below are of specific relevance to ACU's commitment to take steps to eradicate modern slavery.

FOCUS 1 – PROVIDE A LEARNING ENVIRONMENT THAT EMPHASISES GROWTH OF THE WHOLE PERSON

We will equip our learners with the knowledge, skills and confidence to thrive in an interconnected and changing world.

- 1.4 Foster a sense of global responsibility.

FOCUS 5 – PROMOTE HUMAN DIGNITY AND ADVANCE THE COMMON GOOD

We will fulfil our mission commitment to upholding the inherent worth of every individual and advocating for a just and harmonious world.

- 5.1 Strengthen our contribution to the Asia-Pacific region and beyond.
- 5.2 Form international collaborations to address global challenges.
- 5.3 Promote the importance of ethical practice in all aspects of life and work.
- 5.4 Critically evaluate the effects of global progress and change on individuals, communities and environments.

FOCUS 6 – STRENGTHEN OUR INSTITUTIONAL FOUNDATIONS

To facilitate the sustained success and growth of ACU, we will consistently work to strengthen our institutional foundations.

- 6.3 Demonstrate environmental, social and governance excellence.

Vision 2033 is a commitment to our mission, growth, innovation and sustainable success. Vision 2033 is designed to navigate the challenges of the future strategically whilst being highly responsive to contemporary needs, ensuring that we not only adapt but thrive and provide impactful contributions to the communities we serve.

Learn more about Vision 2033
vision2033.acu.edu.au

Criterion 3:

Modern slavery risks in operations and supply chain

ACU regularly submits supplier and spend data to the risk assessment platforms undertaken on behalf of both the Australian Catholic Anti-Slavery Network (ACAN) and the Australasian Universities Procurement Network (AUPN). These assessments present an overall picture of risk, based on the types of goods and services being procured and the country of origin. This helps ACU focus on high-risk activities.

Many key operational activities are carried out by Tier 1 suppliers (direct suppliers to ACU), with Tier 2 suppliers providing goods or services to those Tier 1 suppliers. This standard structure creates potential operational risks, particularly around the delivery and quality of services.

To manage these risks, ACU includes supplier risk categorisation and mitigation actions as part of our broader operational risk framework.

Beyond supplier-related risks, ACU also addresses operational risks by regularly reviewing and updating internal processes and practices to ensure they align with relevant compliance and operational requirements. (For further details, refer to Criterion 5.)

ACU's commitment to eradicating modern slavery is evident in our inclusion of modern slavery considerations in our Operational Risk Registers. We also implement targeted control measures to ensure we meet all Australian federal and state anti-slavery reporting obligations.

ACAN Modern Slavery Risk Taxonomy

For participating Catholic entities, modern slavery risks are defined by the ACAN Category Risk Taxonomy, a classification standard that identifies severity of actual or potential harm to people (saliency) in spend categories.

The ACAN Category Risk Taxonomy is based on sources such as:

- the Global Slavery Index
- the International Labor Organisation (ILO), including definitions of modern slavery
- the Bureau of International Labor Affairs (ILAB), US Department of Labor
- the Global Child Forum and UNICEF.
- **geography:** the country or location where a good is made or service is delivered
- **industry:** the sector in which the making of goods or delivery of service occurred
- **commodity:** the raw materials or components that comprise the goods or products
- **workforce vulnerability:** such as bonded visas, temporary migrants, women or children known to be employed in specific industry sectors
- **Domus 8.7:** trends, cases and risk intelligence identified through the Domus 8.7 remediation service, including grievances and remediation insights relevant to category and risk to workers.

Several key factors are also used to determine the level of risk:



Classification

HIGH RISK	MEDIUM RISK	LOW RISK
Building and construction	Advertising and marketing	Professional services
Cleaning and security	ICT software and network services – onshore	Financial expenses
Events and event management	Utilities	Government and agency fees
Facility management and property maintenance	Fleet management, consumables and maintenance	License/membership fees
Finance and investment	Travel and accommodation	
Food and catering services	Print/mail provider	
Furniture and office supplies		
ICT hardware		
ICT software and network services – offshore		
Labour hire		
Linen, laundry and textile products		
Medical devices and supplies		
Transport, logistics and warehousing		
Uniforms and PPE		
Waste management services		

Note: The following categories are not in scope of the ACAN Category Risk Taxonomy: Pastoral, Payroll (excluding labour-hire and sub-contracting)

Product and risk categorisation systems and software tools

Both ACAN and the AUPN have developed risk categorisation systems based on various aspects of the supply chain, such as the type of goods or services, and where services are provided or made.

Ongoing analysis is undertaken to categorise risk for key areas of spend.

ACU undertakes a number of risk assessments including via platforms and tools developed by the AUPN and ACAN as elaborated on below and in other parts of this Statement. These platforms and tools help to inform ACU where attention may be directed to help address or mitigate modern slavery activities, in conjunction with other means.

The purpose of the software tools can be broadly described as follows:

- to describe the product and risk categorisations
- to allocate specific suppliers to their respective product and risk categorisations, which may include the assignment of primary, secondary or other tier levels of risk
- to enable the collation of suppliers' information
- to enable suppliers to provide

information directly to the tools via portal access

- to collate suppliers' actions
- to enable suppliers to provide a sector-wide response
- to be a single point of contact for all suppliers to avoid suppliers having to make multiple responses to different entities.

In 2024, the AUPN's University Anti-Slavery Program transitioned to the ArcBlue modern slavery risk software solution, to better support Australian and New Zealand universities in identifying supply chain risks and conducting supplier due diligence activity through its self-assessment questionnaire (SAQ) tool.

For 2025, ACU submitted details of suppliers to the AUPN for uploading onto the ArcBlue Modern Slavery Dashboard. The dashboard has provided ACU with the opportunity to view the risks of modern slavery across suppliers servicing the tertiary education sector.

Additionally, 2024 marked the commencement of the implementation of Sievo across numerous Australian universities, including ACU. As a

procurement analytics platform, Sievo enhances visibility into university purchasing patterns and standardises supplier data classification. This unified approach will strengthen risk assessments across university supply chains, enabling institutions to leverage their collective purchasing power more effectively.

As at the end of 2025, 18 universities from Australia and New Zealand are live on Sievo, with a number of other universities preparing to join in 2026.

ACU procurement staff attend regular Sievo University Procurement Analytics Service Champions forums to learn about the platform's functionality and features, and to share ideas with other university members.

Sievo is continuously improving the tool, based on user feedback and requirements, with some significant advancements rolled out in 2025 to improve classification of tail spend and parenting of suppliers.

These tools are invaluable in assisting with ongoing supplier risk assessment and actions required within supply chains, to help mitigate modern slavery activity.



Our supply chain

ACU's annual consolidated revenue for 2025 is \$703.7m, with 69 per cent of this revenue derived from government grants.

We have more than 3,000 suppliers of goods and services in our supply chain. However, just over 253 of these suppliers represent the top 80 per cent of spend. Based on an overall supplier expenditure of approximately \$169 million in 2025, the major categories that represent the top 80 per cent of spend are as follows:

LEVEL 1 SPEND CATEGORY	2025 APPROX SPEND (\$000S)
Information technology, equipment and services	\$25,557
Marketing and communication services	\$12,100
Consulting services and contract research	\$11,863
Facilities management	\$11,442
Building and construction	\$11,336
Student placements	\$10,366
Student recruitment, international	\$9,298
Library books, systems and services	\$8,294
Travel and accommodation	\$7,486
Utilities	\$6,855
Cleaning	\$5,605
Rent	\$3,946
Security services	\$3,742
Other office and workplace supplies	\$3,163
Insurance premiums	\$2,632
Plant and equipment	\$2,141

* ACU Annual Report 2025

Sourcing of goods and services

Our supply chain activities include working with supply chains from many different sectors. Goods and services are sourced from overseas as well as locally, generally via Tier 1 suppliers and not directly. Therefore, ACU has in the supply chain those areas and geographic locations that at some stage in the overall chain could be regarded as representing some type of modern slavery risk. The university, through our Finance and Planning Directorate, also engages in investment activities.

ACU's finance system uses the AUPN spend categorisation system to logically group the variety of goods and services procured across ACU to meet our many operational demands. Goods and services are sourced from the following range of categories, this list having been simplified and amalgamated for this report:

- architectural design services
- audio visual equipment and services
- building and construction – supplies, fit-outs, demolition and services
- business and finance systems
- civil engineering and construction services
- cleaning – equipment and services
- clothing and footwear – corporate, promotional and general
- conservation and heritage services
- education services
- environmental services
- equipment disposal services
- event management services
- facilities management – bookshops, catering, maintenance, landscape/gardening and security

- financial services, including valuation services
- health – equipment, consumables and services
- hire equipment and services
- human resources services – employee assistance, recruitment, training and other HR services
- industrial supplies – electrical, hardware and chemicals
- information technology – computer desktops, laptops, copiers, printers and other peripherals
- information technology – software, systems, design, installation and implementation services
- information technology – training, web services, cybersecurity and other professional services
- insurance – providers, brokers and consultancy services
- laboratory supplies – equipment and consumables
- library – books, periodicals, equipment, software and services
- marketing and media services – advertising, creative, photography and digital services
- office supplies – equipment and consumables
- printing services
- other professional services – asset management, auditing, legal, procurement, risk and quality
- property and realty services
- safety apparel, equipment and consumables
- telecommunications – commodities, equipment, carrier and installation services
- transportation and logistics services – courier, freight, postal, relocation and warehousing
- travel and accommodation – agencies, hotels, airlines, trains and vehicles
- utilities – energy, water, equipment, maintenance and related services
- vehicles – supply, rental, fleet management and cleaning services
- waste management services
- water treatment and sewage services
- workplace health and safety services.

Professional services are generally provided by locally based Tier 1 suppliers. In some cases, these Tier 1 suppliers utilise overseas support staff to conduct some of the more transactional aspects of their service offering. This may include services provided out of countries such as India, China and the Philippines.

Equipment, commodities and clothing are generally sourced from overseas, mainly China and South-East Asia, once again via Tier 1 suppliers located in Australia. ACU, through our membership with Supply Nation, is increasingly sourcing from Aboriginal and/or Torres Strait Islander suppliers, who may nevertheless source some of the items from overseas manufacturers.



Modern slavery risks in investments

ACU has approximately \$33.2 million in investments, managed through JBWere. The investment sector has very specific benchmarks around ethical investments. There are specific fund managers who only undertake ethical investments – these managers will only invest funds with an organisation where they can obtain complete satisfaction the organisation is trading ethically and as stated.

However, modern slavery risks in the investment sector could potentially include low visibility across multi-tiered

international supply chains, which may involve other high-risk sectors and geographies. In addition to the resulting potential exploitation of victims of modern slavery, identified modern slavery in ACU's investment providers' supply chains could lead to reputational risk which could have a negative impact on the organisation.

Refer to Criterion 4: Actions taken - modern slavery risks in investments.

Modern slavery risks to students

Students and young people are at a much higher risk of experiencing modern slavery, with international students being the most vulnerable. International students face heightened risks of modern slavery due to factors such as limited English proficiency, reduced local support networks, financial pressures, and unfamiliarity with Australian workplace and tenancy laws. These vulnerabilities can expose students to deceptive recruitment practices, debt bondage, exploitative work conditions and unsafe housing. ACU continues to monitor these risks, particularly those associated with the conduct of overseas education agents, who play a central role in student recruitment.

ACU currently works with 207 registered international education agents, with significant offshore recruitment activity expected to continue over the next five years. While the university maintains strong contractual oversight of these agents, private arrangements between agents, families and prospective students in source countries remain difficult to monitor and continue to represent a material area of modern slavery risk.

Refer to Criterion 4: Actions taken - modern slavery risks to students.

Criterion 4:

Actions to assess and address risk

Summary of actions taken to date – ongoing and in progress

Below is a summary of actions taken by ACU to date. Many of these items are referred to, or elaborated on, in this and other sections of this report:

- Participation in ACAN and AUPN activities and internal working groups (to share knowledge and assess compliance requirements and risk), including ACAN's year six modern slavery risk management program and ACU's Eradicating Modern Slavery (EMS) Working Group.
 - Collation and submission of annual spend data, including supplier information, to both ACAN and AUPN risk assessment systems.
 - Involvement of key managers and directors from the most at-risk sectors within ACU in supplier engagement workshops.
 - Engagement of specialist modern slavery supplier compliance resource throughout the 2025 reporting year (see section directly below).
 - Discussions with key suppliers in identified high-risk supply chains, such as construction, clothing and critical services. Plans underway to have further interactions with prioritised suppliers to address compliance and verification strategies in relation to anti-modern slavery initiatives.
 - A vendor category of 'fair trade' has been created in the vendor master of ACU's purchasing system. This allows certified fair-trade companies to be identified for future purchasing activity.
 - Our online 'New Supplier Request Form' contains a short modern slavery questionnaire which must be completed by each new supplier prior to onboarding into our finance system. Along with collecting basic supplier information, the form also raises supplier awareness about both modern slavery and ACU's commitment to it.
 - Continuing enrolment of all identified ACU staff in the online training programs developed by ACAN on the broad requirements of anti-slavery measures and activities, with the training continuing to be available to all staff.
 - Continuing use of the toolsets created by both ACAN and the AUPN to gather information about modern slavery, anti-modern slavery activity and legislative requirements.
 - Engagement with ACU's national and state-based managers to reinforce their role and obligations regarding anti-modern slavery measures when making purchasing decisions.
 - In line with ACAN's measurement tool recommendations (originally a GAP analysis, then last year a maturity assessment with its associated scoring, and this year via ACU's completed and regularly updated Sedex Self-Assessment Questionnaire (SAQ)) continue the use of an assessment to monitor continuous improvement across ACU's operations and any impacted areas of ACU.
 - To continue the engagement with key suppliers in areas of high risk, including via deep dive reviews into selected Tier 1 and Tier 2 ACU suppliers.
 - ACU's membership of the University Procurement Hub (UPH) and increased use of UPH's robust specialised services, which provide the opportunity of source-to-contract cost savings by aggregating spend from participating universities across particular categories. UPH also offers associated benefits such as improved process efficiency, spend visibility and effective spend analysis from richer data and marketing intelligence, with the aim to drive continuous improvement.
 - Ongoing staff training, familiarisation with and utilisation of the Sievo procurement analytics platform, which facilitates easy visibility into purchasing patterns, standardises supplier data classification across participating universities, and strengthens risk assessments across our supply chain – this includes ACU procurement staff attendance at regular University Procurement Analytics Service Champions forums to gain and share knowledge, including around suggestions to improve the platform.
 - Continuing to work with our eMarketplace administrator to facilitate network suppliers' ability to tag their own sustainable catalogue products and their modern slavery compliance.
- Specific actions to address modern slavery risk taken by the University are expanded upon in the following section, which includes individual ACU focus area actions and updates, and supplier case studies.

Actions taken – Engagement of specialist modern slavery supplier compliance resource

At the commencement of the reporting period, ACU secured the support of a modern slavery specialist to be embedded in the Finance and Planning team. The role was created to further ACU's examination and analysis of its supply chain, identify areas for continuous improvement, and to make recommendations on activities to strengthen ACU's anti-modern slavery work. The specialist resource:

- assessed modern slavery risk and due diligence of high-risk suppliers and examined Tier 2 of ACU's supply chain for those suppliers
- devised case studies (including the medical gloves category and property management suppliers) and the Electronics Watch Pilot Program article, and other content for this statement
- contributed and shared information via attendance at regular ACAN and AUPN meetings
- identified opportunities for collaboration with other teams across ACU to manage modern slavery risks
- coordinated ACU's submission of supplier details to the Electronics Watch Pilot Program and ongoing monitoring of the project
- conducted an initial assessment of Tier 2 of the supply chain focused on the top 20 highest modern slavery risk suppliers
- assessed the modern slavery risk management and governance mechanisms in the top 20 high-risk suppliers and top 20 suppliers by spend
- completed ACU's Sedex Self-Assessment Questionnaire (SAQ)
- prepared ACU supplier spend spreadsheets for the 2025 reporting period and submitted those to ACAN and the AUPN.
- collaborated with ACAN to onboard ACU's top 20 highest risk suppliers and top 20 highest spend suppliers to Sedex via a jointly branded email to suppliers inviting them to complete ACAN's Modern Slavery Supplier Survey and commence the onboarding process with Sedex. This initiative was part of a continuing effort to increase the number of ACU suppliers on Sedex and in the ACAN supplier database, for visibility of our suppliers' compliance maturity and their supply chains.

Actions taken – Our supply chain

MAPPING THE TIER 2 SUPPLIERS AMONG OUR TOP 20 HIGH-RISK SUPPLIERS

A desktop mapping exercise was conducted on ACU's top 20 spend/high-risk suppliers from the 2024 Modern Slavery Statement. The aim was to identify some of the tier 2 suppliers to assess any modern slavery risk in that tier. Tier 2 suppliers were identified through invoices on ACU's finance system and details on the suppliers' websites.

The exercise indicated the modern slavery risks in place in Tier 2 of the supply chain and some of the measures in place to mitigate these risks.

It was clear from the initial analysis of Tier 2 that some suppliers had no publicly available policies or modern slavery

risk mitigation strategies available. Other Tier 2 suppliers had very robust measures in place to address modern slavery risks. Increased risks also identified in Tier 2 were associated with countries products were sourced from, sub-contracted labour in high-risk countries and high-risk professions (cleaning and security in particular), and the source of critical minerals used in the manufacture of goods.

The mapping of Tier 2 suppliers is an important initial step in gaining visibility of modern slavery risks in the ACU supply chain. The next step, to follow up with identified suppliers, will be undertaken in the next reporting period.

ACAN-PRODUCED ACU SUPPLIER ANALYSIS

ACAN generated the below ACU supplier information graphics – which detail ACU supplier engagement and supplier sourcing locations.

Supplier Engagement Overview

ACAN Entity File
ENTR-2 | Australian Catholic University (ACU)

Total suppliers

3,363

Suppliers in High Risk procurement categories

1,362

ACAN Supplier Surveys completed

492

ACAN Supplier Surveys completed in 2025

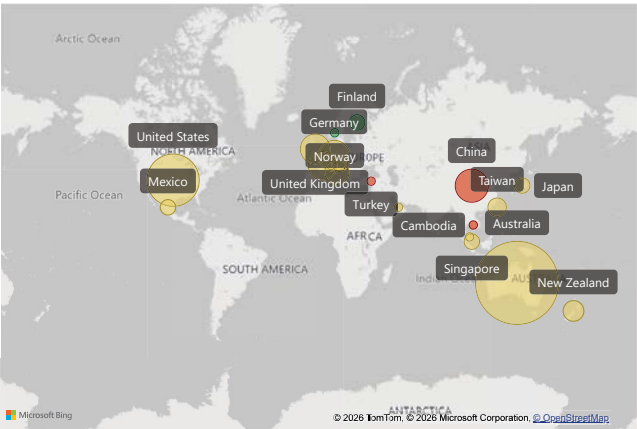
297

Suppliers identified for Sedex Onboarding

98

Sourcing Countries for Tier 1 Suppliers

Overall inherent risk cate... ● high ● low ● medium



Supplier e-mail shared

1750

Supplier Communication

5444

Suppliers completing e-learning

17

Supplier Screening - ACAN Collated

Enhanced 3rd Party Supplier Screening

529

3rd Party Supplier Screening - High and Medium Risk

25

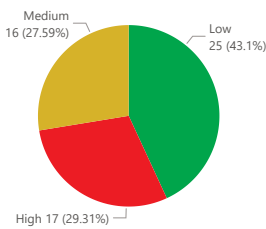
Suppliers on Sedex

75

SAQs Completed

51

Sedex SAQ Risk Category



Audits in 2025

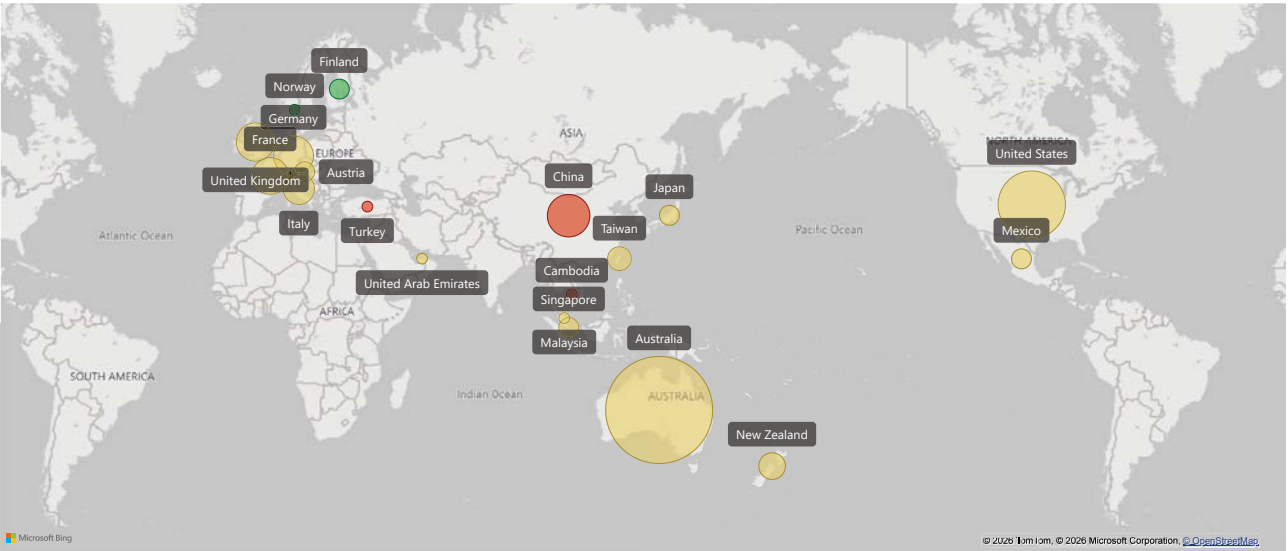
3

Audits Findings in 2025

32

Sourcing Countries for Tier 1 Suppliers

Overall inherent risk category ● high ● low ● medium



Note: Supplier spend may vary between ACAN and ACU due to 'not in scope' suppliers such as Catholic organisations.



Actions taken – Our people

ACU has a diverse workforce of staff from different cultural backgrounds, ethnicities, and genders. Our Code of Conduct and comprehensive suite of policies and procedures reflect terms and conditions, as well as expected standards of behaviour. All policies and procedures are documented, available on the ACU website and reviewed and updated in accordance with quality review protocols on a scheduled and as needed basis. Included is a policy relating to Protected Disclosures.

ACU has an Enterprise Bargaining Agreement (EBA) in place that came into effect in February 2023. The EBA sets out conditions of employment including entitlements and remuneration. Both academic and professional staff are remunerated based on a classification methodology that is fair, transparent and equitable.

ACU has robust mechanisms to receive complaints relating to staff conduct and behaviour, risks to health and safety, bullying, harassment and discrimination. Formal complaints are usually submitted via a web portal, all of which are then managed by Employment Relations within the People and Capability Directorate. Anonymous complaints can also be submitted.

IN DEVELOPMENT

Our People Plan 2025-2030 is currently being finalised, and sets out a refreshed suite of key strategic objectives in support of ACU's mission and strategic priorities. These include building leadership capability, enhancing the safety and wellbeing of our staff, and enhancing staff development within a culture of inclusion and belonging.

ACU is engaged in Enterprise Bargaining with staff representative unions for a new ACU Enterprise Agreement. Bargaining commenced in mid-2025 and the University is hopeful of having a new Enterprise Agreement approved by the Fair Work Commission by mid-2026.

A significant implementation program of work will follow to inform and educate staff around key enterprise agreement and policy changes and requirements.

ACU is committed to ensuring that all staff are remunerated based on a classification methodology that is fair, transparent, and equitable. In 2023, the University identified inaccuracies regarding entitlements for certain casual and sessional academic staff. Throughout 2024 and 2025, ACU has worked to remediate these issues, which has included making correction payments to both current and former staff. This program of work continues into 2026 with the broader review of employee entitlements to identify and resolve any further inaccuracies. Additionally, enhanced governance and controls are being implemented to provide greater visibility over workforce data and ensure these errors do not reoccur.

Actions taken – Properties and Facilities

Facilities management, a responsibility within ACU's Properties and Facilities Directorate, is a recognised potential area of high risk – particularly in relation to cleaning and security. To this end, the directorate has undertaken a number of measures to mitigate this risk, as follows:

- Since its inception, contributing to, actively participating in and sharing learnings from ACU's Eradicating Modern Slavery Working Group via a Properties and Facilities member representative.
- Ensuring all national tenders have a mandatory Q&A field around modern slavery with respect to:
 - supply chain management
 - wages, salaries, benefits and sub-contracting.
- Continuing to audit and retain documentation of three levels of supply chain for selected high-risk items; level one is ACU; level two is the Tier 1 supplier (ie the engaged service provider); level three is the Tier 2 supplier (ie Tier 1's sourcing supplier).

- Annually seeking, for all engaged service contracts, a statutory declaration from the vendor and/or their staff confirming the following for each staff member engaged to provide services to ACU:
 - their name
 - they are a direct employee of the engaged contractor (vendor) with ACU
 - they are employed at the specified ACU campus
 - they are paid in accordance with the modern industrial award stated in the service agreement
 - they receive all their salary benefits, including insurance, superannuation and leave entitlements
 - the statement is made under their own free will and without influence.

If this information cannot be provided directly by the vendor's personnel, ACU will verify the information by audit or other validation processes.

ROBUST NATIONAL CLEANING AND SECURITY AGREEMENTS

In 2024, ACU's Properties and Facilities Directorate finalised two important tender projects. Each of these was the result of a formal and stringent tender process commenced in 2023, through the University Procurement Hub (via Accenture), to select a security services company and a cleaning company to service ACU's seven Australian campuses. The suppliers' existing modern slavery documentation, activities and commitments were a key part of the tender evaluation criteria and a key part of ACU's contracts with the selected companies.

The executed agreements between ACU and the cleaning and security companies require that each of those must take the following actions:

- Take reasonable steps to ensure there is no modern slavery in the supply chains for the contractor agents and/or contractors, or in any part of their respective businesses or dealings.
- Conduct their business in a manner consistent with the principles of the Modern Slavery Act, and ensure that neither the contractor nor its agents, contractors or employees has been convicted of any offences under the Modern Slavery Act nor been the subject of any investigation or enforcement under the Modern Slavery Act.
- Implement due diligence procedures for their business's own contractor agents, contractors and other participants to ensure that there is no modern slavery in its supply chains. These procedures are to be documented in any annual modern slavery statements prepared by the respective organisations (as below).

- When requested, in the first quarter of each year, deliver to ACU an annual modern slavery statement detailing what steps the company has taken to ensure modern slavery is not present in its supply chain or any part of its business. The agreement stipulates: "The Contractor must deliver to ACU... no later than 3 calendar months from December 31 each year, an annual statement prepared in accordance with section 16(1) of the Modern Slavery Act, including, but not limited to, the steps it has taken to ensure that modern slavery is not taking place in any of its supply chains or in any part of its business." The suppliers' annual statements, as may be requested, are to be reviewed by ACU, and, where indicated, appropriate recommendations are made to the supplier for future improvements, adjustments or corrective action.
- Notify ACU immediately should it become aware of modern slavery – or even suspect it – in any part of its supply chain.

Furthermore, specific clauses in each of these agreements stipulate that the contractors may be subject to annual integrity payroll audits by a third party auditor nominated by ACU, and that, "The Contractor must deliver to ACU... such other information or reports as may reasonably be required from time to time by ACU to comply with the requirements, or avoid any contravention, of the Modern Slavery Act."

In line with this expectation, ACU engaged an independent auditor in August 2025 to undertake a payroll audit of the security and cleaning services companies. A similar audit will be undertaken in 2026 and 2027. The 2025 audit findings were considered not material to the terms of the contract and were considered addressable through a minor broadening of the terms of the 2026 September payroll audit.

The security and cleaning companies are also required to provide monthly declarations that staff and subcontractors are remunerated in accordance with respective award requirements.

Actions taken – IT hardware

ACU MULTI-CAMPUS AUDIOVISUAL FITOUT RISK IDENTIFIED AND ADDRESSED

During 2025, ACU embarked on an extensive audiovisual fitout across its campuses nationally. We conducted due diligence on new electronics suppliers to identify any modern slavery risks in their supply chains.

One well-known supplier of audiovisual equipment was replaced by the ACU project team due to the publicised

exploitation of its workers making plastic moulds in Malaysia.

A broader review of all audiovisual componentry, looking at modern slavery and other risks, is planned to be undertaken in the next reporting period.

ELECTRONICS WATCH PILOT PROJECT AND ACU'S IT HARDWARE SUPPLY CHAIN

During 2025, ACU was invited by the AUPN to participate in the joint Electronics Watch Pilot Program. The program included Higher Ed Services (HES), Electronics Watch and multiple Australian universities through their membership of the AUPN.

As the leading international body monitoring and identifying worker exploitation in public procurement electronics supply chains, Electronics Watch provided unique insight into worker conditions.

Electronics Watch identified three of the IT products ACU was buying from two companies as being of potential concern. The ACU suppliers in question were contacted directly for details on the products and the factories in which they were produced. One supplier was the manufacturer of the products, the other an Australian reseller. Both ACU Tier 1 suppliers complied with ACU's request for details on behalf of Electronics Watch.

One supplier had discontinued the product model and was no longer using the factory and provided details of the countries involved in their supply chain. The other supplier, the manufacturer of products, would only release details if ACU signed a non-disclosure agreement. This was for commercial reasons related to competition and business-sensitive information.

Electronics Watch provided ACU with monitoring reports from Quarters 3 and 4 of 2024 and Quarters 1 and 2 of 2025, in relation to the specific products ACU had enquired about.

Due to confidentiality restrictions, the exact details of violations of worker rights cannot be disclosed. They related to excessive overtime, underpayment of overtime rates and age discrimination. Factories located in China and Malaysia were the subject of the violations. In each case, the manufacturer engaged in dialogue with workers and their representatives to improve conditions.

Reports provided by Electronics Watch to ACU showed that the suppliers in question had engaged in dialogue with workers and the factory management in order to address violations.

From this due diligence project, ACU learnt that:

- IT suppliers were responsive to requests for supply chain information
- business sensitive and competition related details could not be shared with third parties, but could be used by ACU
- suppliers had engaged in discussions with affected workers in factories in China and Malaysia
- the risk of worker exploitation in IT supply chains is a reality
- Electronics Watch had monitored several of the factories and mines involved in the manufacture of the final product, but it had limited capacity to verify whether issues had been resolved.

Actions taken – procurement processes, systems and documentation

ACU PROCUREMENT POLICY

Supplier engagement is in accordance with the ACU Procurement Policy, which is regularly updated. It underwent substantial revision in 2022 and 2024, with further sustainability-commitment related wording added in 2025. The policy sets out how sourcing decisions may be undertaken by ACU staff. The policy is underpinned by procedural and reference materials, which establish minimum requirements for key suppliers.

In 2022, a clause was introduced which stated ACU's commitment to tackling modern slavery practices at every level, including that:

"Staff purchasers of university goods and services are required to take steps to identify and minimise any modern slavery risks and to take into consideration the principles of the Modern Slavery Act 2018 (Cth), the commitments made

by ACU to date towards eradicating modern slavery and human trafficking, and to ensure suppliers to ACU:

- conduct their businesses in a manner that is consistent with the principles of the Modern Slavery Act and
- take reasonable steps to ensure that there is no modern slavery in the supply chains of their agents, contractors, and/or sub-contractors or any part of their respective businesses or dealings."

ACU's Procurement Policy underwent further change in 2024, which included adding a section on supplier agreements. This stipulates that where an ACU contract template document (containing an existing pre-approved and robust modern slavery clause) is not used, in favour of the supplier's template, the staff member must ask ACU's Office of General Counsel to insert a suitable modern slavery clause

during a mandatory legal review of the agreement, prior to its execution.

In 2025, at the request of the EMS Group Chair, a clause was added into the Procurement Policy which outlined ACU's commitment to sustainability and its alignment to Laudato si' principles:

"ACU's deep commitment to sustainability is informed by, and aligns with, Pope Francis' encyclical, Laudato si': On the care for our common home. Laudato si' articulates the indivisible link between caring for each other and caring for our common home. Under this commitment, ACU staff purchasers are encouraged to consider where possible buying

goods and services with a low environmental impact and a high, positive social impact (to be considered alongside primary buying considerations such as value for money and quality etc). This may equate practically to buying goods and services from suppliers that, for example (and not limited to), take actions to:

- minimise their carbon emissions;
- use recycled materials;
- produce recyclable products;
- meet or exceed regulations to eliminate modern slavery in supply chains; and
- support Indigenous businesses."

ACU SOURCING PROCESS – TENDER, MINIMUM SUPPLIER AND NEW SUPPLIER REQUIREMENTS, AND RELATED DOCUMENTATION

We have transitioned to addressing modern slavery as it relates to our new supplier touchpoints upfront – when undertaking tenders and onboarding suppliers, and as existing supplier contracts are extended or renewed – while continuing to review our existing supplier base.

ACU has included requirements for sustainable and ethical sourcing, including anti-slavery measures, in our tender and contract template documentation for a number of years. These continue to be upgraded, with input from ACU legal counsel, to reflect more stringent requirements, and have been applied to all procurement activities that utilise ACU's formal sourcing processes.

These have included sourcing in relation to high-risk sectors, such as corporate apparel supply. These minimum requirements reference sustainability, ethical sourcing and anti-slavery requirements. ACU requires suppliers to provide information about countries and places of manufacture and what auditing and compliance requirements they have in place.

To this end, specific and robust anti-modern slavery clauses have been built into ACU's full suite of tender and contract template documentation (which includes tailored documentation for services, goods, contractors, consultants

and technology). Our online 'New Supplier Request Form' contains a comprehensive modern slavery questionnaire to be completed by each new supplier prior to onboarding into our finance system.

All suppliers of goods to ACU in tender situations must answer a detailed tender assessment criterion (TAC) titled 'Commitment to Ethical Sourcing', which requires a supplier's comprehensive written response as to their commitment, policies, processes and actions in relation to sustainability, ethical sourcing and modern slavery. This criterion is scored by evaluators and forms part of the supplier's overall score. This question is also included in our 'Minimum Requirements for Suppliers of Goods and Services to ACU – In Non-Tender Situations'. This is to provide transparency that everything possible is being done to avoid slavery practices in the supply chain.

Supply arrangements resulting from formalised tender processes are generally managed under formal contract agreements involving key performance indicators for effective performance management. Tender documentation and contracts are maintained in SharePoint databases, and formal tendering processes for sourcing projects use a hosted tender portal arrangement.

EMARKETPLACE PURCHASING CATALOGUE

The ACU eMarketplace catalogue displays products from a range of different suppliers which can be selected by staff using ACU's online Finance system for requisitioning and purchasing. The catalogue is restricted to preferred suppliers and their products. The eMarketplace administrators have

started working with the network suppliers to start tagging their catalogue products in order to track ESG spend moving forward, so suppliers will be able to start tagging their own sustainable and Indigenous source products and their modern slavery compliance.

Actions taken – Modern slavery staff training (including new module and updated existing modules and processes)

In mid-2025, ACAN provided to ACU updated, shorter, streamlined and more user-friendly training modules. A third new module, Grievance and Remedy, was added to the two existing modules, to be undertaken by certain identified staff and the members of ACU's Eradicating Modern Slavery (EMS) Working Group.

All ACU staff have access to the online training program modules developed by ACAN to educate them on the broad requirements of anti-slavery measures and activities for their roles.

All staff members involved in purchasing and procurement decision-making are required to undertake the required ACAN modern slavery training modules. These modules are available to all ACU staff via the staff learning hub. This provides further opportunity for them to undertake this training as part of any professional development they may identify.

Directors and managers were advised that, while all staff would have the option to elect to complete the training modules (as communicated to staff in ACU's internal staff bulletin), it is a mandatory requirement for certain staff groups, including those that make purchasing and procurement decisions as part of their role. These staff groups include:

- Group 1 – Management Levels 5 and 6, including national and state managers.
- Group 2 – Faculty finance managers, finance portfolio management accountants, finance procurement personnel, properties facilities managers at site or state level, and properties capital development and project managers, if not at Levels 5 or 6.

As of 31 December 2025, 787 staff or 70 per cent of those enrolled (including directors and managers) had completed the two introductory modules, Modern Slavery 101 and Business Relevance.

A further 22 staff have completed the new third specific role-required module, Grievance and Remedy.

ACU's People and Capability Directorate continue to monitor and review processes regarding enrolment into the modern slavery training modules, to improve completion rates and outcomes.

There was significantly higher engagement in 2025 than in previous years, with 327 staff completing both module one and module two. In addition to the updated modules, a key driver of increased participation in 2025 has been process improvements made by the Learning and Development team, including building into business as usual the follow up of those staff who show as non-complete.

Actions taken – ACU membership and benefits of key affiliated external and internal associations and groups (with staff and/or executive attendance at regular meetings)

ACAN ANTI-MODERN SLAVERY WORKING GROUP

In 2025, ACAN provided 11 monthly webinars to ACU and five supplementary open-forum sessions. ACAN's Modern Slavery Risk Management Program continued to offer access to the Supplier Ethical Data Exchange platform (Sedex) and a bespoke platform (Rota) that houses ACAN tools and resources. Rota also provides access to site-based grievance channels and other remediation resources. The ACAN program includes access to the Domus 8.7 Modern Slavery Remediation Service. Domus 8.7 launched a 24/7 worker care

line and multilingual outreach materials available for use on ACAN member sites. ACAN continued to represent ACU and Catholic organisations on the Australian Government's Modern Slavery Act Expert Advisory Group and National Roundtable on People Trafficking and Slavery. Submissions, consultations and engagement with the Modern Slavery Act Review, Australian Anti-slavery Commissioner and Office of the NSW Anti-slavery Commissioner have also continued. ACU's supplier engagement program is expanded upon below.

ACU'S ACAN SUPPLIER ENGAGEMENT PROGRAM

ACAN provides supplier engagement support and data, enabling a systematic and comprehensive supply chain risk assessment. In 2025, the ACAN Modern Slavery Risk Management Program launched a new purpose-built data management platform – ROTA. ROTA centralises the ACAN Modern Slavery Risk Management Program framework and facilitates supplier performance evaluation and engagement.

ACAN supports ACU's modern slavery program, providing access to the following features and services:

1. Evaluation of the modern slavery risk within operations and supply chains, using the ACAN Risk Taxonomy.
2. ACAN Supplier Survey to identify supplier revenue, number of employees, countries of origin for goods sourced overseas, workforce contractual arrangements and Sedex membership status.
3. Supplier education on modern slavery and risk management in key areas: cleaning, building and construction, procurement of labour, labour hire and services, sourcing goods from overseas, grievance mechanisms and remediation.
4. Onboarding suppliers to Sedex, which requires a business address, contact details and goods or services provided.

5. The Sedex SAQ, which helps suppliers evaluate their practices against established standards and identify areas for improvement.
6. Desktop reviews to identify key actions required from suppliers.
7. Enhance supplier screening using Know Your Client (KYC) intelligence software.
8. Corporate Social Compliance Audits provide a point in time, objective and independent verification process of supplier alignment with local laws and worker wellbeing standards.
9. Domus 8.7 Index modern slavery statement assessment on selected suppliers in high-risk categories.
10. ACAN Prequalified Supplier Directory – a list of preferred suppliers accessible to Catholic organisations.

SEDEX MEMBERSHIP - TO MONITOR, REPORT ON AND MITIGATE ACU SUPPLIER RISK

Sedex is the world's largest online platform for collecting, sharing and auditing ethical supply chain information. Sedex enables self-reporting of suppliers against industry sector databases.

In mid-2021, as per ACAN's modern slavery program guidance, ACU joined Sedex and commenced supplier onboarding in collaboration with ACAN. We initially invited 49 high-risk ACU suppliers to join Sedex, requesting they complete a detailed self-assessment questionnaire about their organisation (SAQ), and connect with ACU. This ongoing onboarding process allows us to build and gain strong visibility and compliance capabilities over our supply chain and its inherent risks.

As of the end of 2025, 89 ACU suppliers are on Sedex (this number includes suppliers not procured from in 2025) with 492 suppliers having completed ACAN's Supplier Survey.

The Sedex tool has a number of useful capabilities and we will continue to explore and implement these further. In January of each year, ACU provides the previous year's supplier spend data and contacts to ACAN for the purposes of confirming correct ACAN taxonomy and to cross-reference with and build information for ACAN's existing supplier base, and to facilitate ACAN's ongoing assistance to coordinate the following:

- supplier invitations to webinars and pre-assessment questionnaires
- further supplier Sedex onboarding.

The Sedex platform/process can be used to:

- easily find existing suppliers within the sector and create relationships with them
- check supplier progress as they complete the steps in the onboarding process
- review each supplier individually and engage with them around improvement
- put higher-risk suppliers into an audit program
- create intuitive data reports and insights

- identify deficiencies for discussion in more detail with the supplier
- pull out specific topics of concern and take a specific issue-based approach.

Sedex representatives continue to support ACU procurement staff, providing training on Sedex functions and updates, and offering assistance and guidance to use the tool effectively.

ACU continues to increase its use of ACAN-related services, including supplier base analysis and the resulting further onboarding of suppliers to Sedex.

In 2025, Sedex launched a forced labour tool as part of the service available to ACU. The tool draws on non-compliance and observations raised during audits at supplier sites to identify common signs or 'clues' that point to the possible existence of forced labour within a supply chain. The number of indicators – which are based on research by the International Labour Organisation (ILO) – identified at specific sites are categorised and weighted to calculate a site's audit indicator score.

ACU procurement staff participate in regular joint ACAN and Sedex supplier briefings and educational sessions regarding supplier due diligence and modern slavery risk management. In 2025, staff attended a joint ACAN and Sedex presentation on the Sedex Self-Assessment Questionnaire (SAQ). Sedex provided details on the use of the SAQ to identify areas for improvement across an organisation's policies and procedures.

Procurement staff also participate regularly in Sedex half-day in-person member roundtable discussions. These events bring together representatives from national and international organisations across a range of different industries to workshop collaborative strategies to identify, manage and remediate modern slavery risks. The participants workshop program approaches, learnings and common challenges.

The use of Sedex complements the similar process being undertaken through the AUPN modern slavery dashboard (which is specific to suppliers across the university sector).

AUPN MODERN SLAVERY WORKING GROUP ANTI-SLAVERY FORUM

The AUPN modern slavery program is a higher education sector-wide initiative involving 41 universities across Australia and New Zealand. The program leverages the group's collective spend and market influence as well as expertise to maximise purchasing power, drive ethical procurement and ensure compliance with the Modern Slavery Act. In 2025, nine dedicated forum meetings brought together expert speakers, survivor advocates and

procurement professionals to discuss topics such as ethical apparel procurement and risk identification tools. Meetings featured a range of informative presentations, including those by Electronics Watch, Australian Catholic Religious Against Trafficking in Humans (ACRATH), Etiko Clothing, and the University of Sydney's Student Modern Slavery Ambassador, with participating universities generously sharing their approach to managing modern slavery risk.

ACU'S ERADICATING MODERN SLAVERY (EMS) WORKING GROUP

Established towards the end of 2020, the group comprises members of the ACU senior executive, other key ACU personnel and representatives from the Catholic Archdiocese of Sydney's Anti-Slavery Taskforce. Since its inception, the group was chaired enthusiastically by the Vice-President and Director of Mission, who left the university in early 2025. The Chair role was taken up again towards the end of 2025 by the new Deputy Vice-Chancellor (Catholic Mission). Consequently, only one EMS Working Group meeting was held in 2025.

The EMS Working Group's objectives are to:

- provide input and advice to the university on issues related to modern slavery
- actively support the development and implementation of ACU's Modern Slavery Action Plan
- help ACU to determine priority actions to be undertaken and to establish annual goals and targets
- monitor and review actions taken to assess and address modern slavery risks and evaluate their effectiveness
- ensure ACU meets the requirements of the Modern Slavery Act 2018 (Cth)
- raise awareness across ACU, including among students and professional and academic staff.

Since its commencement, key focus points for ACU's EMS Working Group have included:

- the redesign, expansion and enhancement of the ACU website's eradicating modern slavery information page
- providing a forum to facilitate information flow and debate on modern slavery risks across ACU's operations and supply chain
- continuing to raise awareness about modern slavery risks (and advise on potential actions to address these) across the university
- monitoring and reviewing actions taken to assess and address modern slavery risks and evaluate their effectiveness.

Moving forward, the EMS Working Group's focus will include:

- working with relevant staff to embed anti-slavery principles into ACU's staff induction program, and the organisation's suite of policies and procedures relating to conduct, decision-making, risk management, internal organisation and management
- reviewing the ACU website to look for opportunities to include modern slavery references and educational resources, such as case studies
- a review of the working group's structure, membership and activities to ensure it is optimised to fulfil its purpose.

DOMUS 8.7 REMEDIATION PROGRAM

ACU is a founding member of Domus 8.7. Domus 8.7 was established as an agency of the Catholic Archdiocese of Sydney in 2020 as a key element of the ACAN Modern Slavery Risk Management Program. This collaborative approach to remediation is aligned with the Modern Slavery Act and Catholic social teaching, which are centred on the needs, wellbeing and empowerment of people impacted.

Domus 8.7 provides ACU with:

- resources that enable us to listen to workers (a grievance channel)
- a 24/7 careline for workers on our sites, staffed by professional counsellors
- direct support to people impacted by modern slavery
- guidance and technical assistance to prevent, identify and remediate modern slavery
- a documented process to assess if an organisation has caused, contributed or is directly linked to modern slavery and modern slavery indicators.

Domus 8.7 empowers people impacted by modern slavery to have choice and control over what forms of remediation are meaningful to them and to engage safely with business/supply chain actors. Supports may include:

- modern slavery indicator assessment
- needs assessment, case coordination, response and remediation planning
- referrals to community, social services, unions
- transport, accommodation, financial and food support
- legal support, referrals, accompaniment and advocacy
- job training, retraining and redeployment
- accompaniment and advocacy to engage with government and law enforcement agencies
- opportunities to contribute lived expertise to improve modern slavery responses.

The Domus 8.7 Advisory Committee Members include a person with lived expertise, Mr Moe Turaga, and ACU's Vice-Chancellor.

Actions taken – Modern slavery risks to students

STUDENTS – INTERNATIONAL

In 2023, ACU strengthened the modern slavery clause within its Education Agent Agreements, requiring all agents to comply with relevant legislation, embed due diligence processes, assess risk across their operations and supply chains, and report any suspected instances of modern slavery.

In 2025, these strengthened obligations were reaffirmed and applied across all new and renewing Education Agent Agreements. The current agreement framework contains an expanded and modernised suite of compliance and behavioural requirements, far exceeding the earlier clause structure, and reinforces expectations relating to ethical and transparent recruitment, accurate information provision, agent conduct and compliance with the ESOS Act and National Code (including Standards 4 and 6).

ACU also uses student feedback to monitor agent behaviour. Enhanced onboarding surveys introduced in 2024 – 2025 include targeted questions about students’ experiences with their education agents, supporting both TEQSA and National Code compliance and enabling early detection of concerning

patterns.

To reduce vulnerability to workplace exploitation after arrival, ACU provides every commencing international student cohort with information on Australian work rights, developed in partnership with ACU Careers and Employability. This includes guidance on minimum wage, working hours, conditions of employment and the role of the Fair Work Ombudsman. Students can also access counselling, wellbeing support, legal advice and dedicated international student advisors if they have concerns about exploitation, recruitment practices or unsafe arrangements.

ACU’s commitment to student safety, wellbeing and ethical recruitment continues to be recognised at the national level. In 2025, the university was ranked fourth in Australia for international undergraduate student support and services experience, with satisfaction rising from 83.8 per cent in 2023 to 87.9 per cent in 2024, according to QILT. This result demonstrates the effectiveness of ACU’s support systems, including those aimed at mitigating modern slavery risks.

Sector engagement and collaboration – ACU attends International Students Modern Slavery Risks Roundtable

In September 2025, ACU attended and participated in the International Students Modern Slavery Risks Roundtable, hosted by the University of Sydney. ACU was represented by the Associate Director, International Admissions and Compliance, and the Senior International Student Advisor.

The roundtable brought together Australian universities, specialist organisations and frontline

agencies to examine emerging modern slavery risks affecting international students, including:

- deceptive or coercive recruitment practices
- fraudulent job offers and job scams
- exploitative or unsafe work conditions
- vulnerabilities linked to

visa pressures and financial dependence.

The learnings from the roundtable are being incorporated into ACU’s student communications, agent management practices, and internal procedures for identifying and responding to modern slavery risks, further strengthening ACU’s institutional approach to prevention and early intervention.

STUDENTS – GENERAL

The Student Experience Directorate maintains robust systems and procedures to ensure adherence to ethical work practices. As part of this commitment, the directorate reviews all suppliers of equipment, merchandise and services to verify compliance with modern slavery policies, statements, certifications and ethical standards. Preference is given to suppliers demonstrating strong ethical practices and transparent governance.

The directorate ensures that all staff have completed the appropriate ACAN modern slavery training modules.

All students at ACU, including international students, have access to these free, confidential services:

- Counselling on campus. ACU counsellors are experienced and trained psychologists or social workers who deliver specialised programs in the areas of mental health, emotional wellbeing and enhancing mental resilience.

All students can access six free counselling sessions per year. Each face-to-face session runs for 50 minutes and provides the opportunity to discuss any issues of concern in a supportive environment. Two 30-minute drop-in sessions are also available on campus each day.

- Two 45-minute legal advice sessions with a private law firm that includes access to written advice. ACAN program managers have conducted outreach to the law firm to discuss training for their staff on how to increase awareness of and respond to any indicators of modern slavery moving forward.

In 2024, ACU’s Careers and Employability team undertook fair work training from the Ombudsman to ensure they were well-prepared to offer fair work support and advice and correct and current information during appointments with students. This training will continue annually. The team developed a dedicated workshop and a suite of tailored

resources, available on the CareerHub platform, to educate students and graduates about the Fair Work Act and workplace rights. These materials address issues such as exploitation, breaches of fair work practices, and guidance on responding to misconduct observed during placements or employment.

All staff and participants involved in student activities have designated breaks built into event schedules to ensure no one is required to work beyond reasonable limits.

ACU's Safeguarding and Student Safety team assists any student who may be facing difficult times or who may have experienced, observed or heard about gender-based violence – including sexual behaviour and/or sexual violence – which may be illegal, inappropriate, threatening or concerning (including situations related to modern slavery).

Students can access the service by:

- submitting an online reporting form: Safeguarding and Incident Reporting
- talking to a Safety Support Officer, a trusted member of staff, an ACU counsellor or the Safeguarding and Student Safety team
- calling Safeguarding and Student Safety on 0476 852 735
- emailing respectandsafety@acu.edu.au
- calling the ACU National Security Centre on 1300 729 452 (should a student require immediate assistance).

The Safeguarding and Student Safety team can provide trauma informed and victim-centred support to students who have experienced gender-based violence (including incidences of modern slavery). Support is individualised, tailored to the specific situation and person's need. This support may include (but is not limited to) providing:

- referrals to internal ACU services, including counselling, a 24-hour mental health support line and legal advice sessions, as well as assistance with accommodation/housing/hardship grants
- referrals to external specialist services to support the student's needs and care plan
- special consideration forms for academic adjustments and extensions
- assistance with reporting options both internally at ACU and externally to the police
- education and awareness to help address concerning behaviours and drivers of gender-based violence to support safety on campus
- safety planning and welfare checks.

To date, the team has not had to manage a modern slavery disclosure or report; however, it is prepared to manage such matters if and when they arise.

Actions taken – Modern slavery risks in investments

As an investor, ACU aims to ensure that modern slavery occurs neither in the companies in which we invest nor in their supply chains. This includes funds managed by external managers and our self-managed portfolios, which are mainly bank term deposits. The university supports investments in the Catholic Church's charitable religious and educational works. We also support ethical and socially responsible investments. We invest only with organisations that demonstrate strong environmental stewardship, consumer protection, human rights and employee diversity practices.

The Investment Strategy Group (ISG) at JBWere (refer Criterion 3 'Modern Slavery Risks in Investments') published their **Responsible Investment Policy** in May 2024, which outlines their responsible investment (RI) approach and framework. JBWere considers modern slavery as part of the 'S' for social risks, and it represents a material risk from an investment perspective. JBWere believes failure to consider modern slavery risk as part of the ESG factors in a company's operations or supply chain can present potential negative financial impacts through reputation damage, litigation and operational risks which may harm a company's social license to operate. JBWere approaches risks arising from modern slavery in a similar way to other ESG and investment risks. The NAB Group publishes annually a joint Modern Slavery and Human Trafficking Statement on behalf of NAB Group entities which includes JBWere. **[View the NAB 2025 Modern Slavery and Human Trafficking Statement.](#)**

JBWere manages modern slavery-related risk across a range of asset classes:

- **Equities:** The JBWere equity research and selection process includes an assessment of modern slavery risk when reviewing candidate stocks. The JBWere equities modern slavery risk assessment process includes a review of each potential investee company's Modern Slavery Statement (where this exists), or other corporate disclosures related to corporate governance, human rights and/or labour relations. Where no primary source Modern Slavery Statement is available, the process utilises MSCI ESG scores associated with labour relations and a review of MSCI ESG controversies data for evidence of increased modern slavery risk.
- **Fixed income:** For JBWere, certain modern slavery risks are captured in an issuer's MSCI ESG score and issuer credit rating. The team also monitors modern slavery risks through debt investor updates and leverages the credit ratings and analysis of recognised rating agencies such as S&P Global and Moody's. The identification and assessment of the ESG factors relevant to a debt issuer feeds directly into any recommendation for a JBWere client to buy, hold or sell a bond or hybrid issued by an issuer. In addition, the assessment of modern slavery risks as part of the broader ESG risk assessment relevant to a particular debt issuer also has a direct bearing on the value JBWere assigns to any debt instrument of that issuer.



Actions taken – Supplier case studies

CASE STUDY

ANALYSIS OF MEDICAL GLOVE SUPPLIERS – AND SUBSEQUENT SECTOR-WIDE AUPN GLOVE PROJECT

The disposable medical glove industry represents a high risk of modern slavery across its entire supply chain. This includes the farming of raw materials, the production of synthetics, the production of ceramic glove moulds and the production of the gloves themselves.

ACU relies on a supply of medical gloves for nursing and allied health courses and for PPE across the university.

An examination in 2025 of two of the glove manufacturers in the ACU supply chain identified historical and current instances of modern slavery and labour exploitation in Malaysia.

ACU has used two local medical supply companies to source gloves from manufacturers. Two of the manufacturers supplying the gloves have had cases of alleged modern slavery in their supply chain. One glove manufacturer is a multinational company with operations in Malaysia, the other manufacturer is an Australian company with operations in Malaysia.

Both of ACU's suppliers sourced their gloves from a Malaysian-based multinational supplier and manufacturer. Allegations of forced labour and excessive recruitment fees were made against this Malaysian company in 2021. The company engaged in a remediation program, paying current and former employees a total of 45.5 million Malaysian Ringgit (AU\$16,000,000).

This manufacturer now has a Zero Recruitment Fee policy; however, they have no way of enforcing that on recruitment agencies in Nepal, Bangladesh or Myanmar, their main sources of migrant labour.

ACU was supplied with gloves during the period leading up to, and including, the time of the

allegations (2019 – 2021).

The historic allegations mean that there is a heightened modern slavery risk in the supply chain. The company has exhibited a willingness to exploit migrant workers in the past. Their lack of control over recruitment agencies and fees in Nepal, Bangladesh and Myanmar means that the risk of debt bondage still exists with migrant workers from these countries.

The second glove manufacturer is a prominent Australian manufacturer of disposable medical gloves and other products with operations in Malaysia. This manufacturer has had well-publicised modern slavery risks in its supply chain and took action against a Malaysian ceramic glove mould maker in 2025.

In late 2025, in response to evolving concerns around modern slavery risks in medical glove supply chains, Sydney University initiated a sector-wide review of medical gloves under the AUPN framework, requesting information from participating universities to help build a sector-wide view of glove procurement modern slavery risks and identify opportunities for collaborative action, including supplier engagement and risk reduction strategies. ACU provided details of the above identified suppliers for the project. Once the information gathering stage is complete, the project's intentions are to:

- strengthen member universities' collective due diligence,
- inform a coordinated response to modern slavery risks in the glove industry, and
- engage with suppliers as a collective.

In 2026, the AUPN will provide findings to AUPN member universities, and the group will work together on a coordinated supplier due diligence strategy.

PROPERTY MANAGEMENT SUPPLIERS AND TIER 2 CLEANING CONTRACTOR RISK EXERCISE

During 2025, an exercise undertaken by the specialist modern slavery compliance resource revealed that some property management suppliers leasing properties to ACU were using their own cleaning contractors to clean common areas.

ACU identified this as a modern slavery risk, as the university had no visibility of the employment conditions of these cleaners. This contrasted strongly with ACU's own new cleaning supplier contract, which was awarded after a rigorous external due diligence process.

A desktop review of eight of ACU's highest spend property management suppliers was conducted, and their governance structures and measures to mitigate any modern slavery risk reviewed. Four of the property management suppliers had specific measures in place to mitigate modern slavery risks. One of these suppliers was a current member of the Cleaning Accountability Framework (CAF), a certification body aiming to prevent exploitation in the cleaning sector. One supplier was a local government body responsible for annual reporting

under the requirements of the Heightened Modern Slavery Due Diligence reporting to the New South Wales Anti-Slavery Commissioner. Modern slavery statements had been submitted by three of these property management suppliers, although one of the statements was not for the previous reporting period. Four property management suppliers had no publicly available policies on human rights or mechanisms in place to mitigate modern slavery risks.

The review of these property management suppliers was undertaken to gain information on their policies, governance mechanisms and specific modern slavery risk management processes. ACU will continue to monitor any potential risk with those suppliers lacking governance mechanisms and will consider engaging with them directly in efforts to address those gaps in the next reporting period. The Properties and Facilities Directorate has committed to complete interviews, awareness and reviews of those property management vendors without published modern slavery documentation (which represent 1.5% of ACU's leased space). The project is forecast for completion by September 2026.

PROPERTY MANAGEMENT SUPPLIERS 2025 DUE DILIGENCE

SUPPLIER	TYPE	RISK MANAGEMENT AND GOVERNANCE STRUCTURES
Supplier A	Local government body	Annual reporting under the requirements of the Heightened Modern Slavery Due Diligence reporting to the New South Wales Anti-slavery Commissioner
Supplier B	Australian subsidiary of a multinational	- Human rights policy – modern slavery - Modern slavery training for property management employees - Modern slavery statements identifying sub-contracted cleaning as a priority 1 risk - Supplier code of conduct - Whistleblower policy – EthicsPoint - Member of the Property Council of Australia's Modern Slavery and Human Rights Working Group - Recognition of the Cleaning Accountability Framework (CAF) and certified cleaning suppliers
Supplier C	Australian subsidiary of a multinational	- Modern slavery statement - Global code of business conduct – October 2024 (respects human rights, prohibits all forms of forced or compulsory labour, and prohibits the use of child labour) - Global vendor/supplier integrity policy (prohibits all forms of forced or compulsory labour and prohibits the use of child labour) - Whistleblower policy – EthicsPoint
Supplier D	Australian subsidiary of a multinational	- Anti-slavery policy - Supplier code of conduct - Whistleblowing policy - Modern slavery remediation plan - Modern slavery statement

The following property management suppliers had no publicly available material on their governance structures or measures to mitigate modern slavery risks. A follow-up assessment will be conducted in 2026 to obtain these details from the suppliers.

PROPERTY MANAGEMENT SUPPLIERS IN 2025 WITH NO PUBLICLY AVAILABLE POLICIES ON GOVERNANCE OR MODERN SLAVERY			
SUPPLIER	TYPE	RISK MANAGEMENT AND GOVERNANCE STRUCTURES	ACU SPEND IN 2025
Supplier E	Australian international real estate group	No publicly available policies Member of the Property Council of Australia	More than \$3 million
Supplier F	Australian company	No publicly available policies	More than \$500,000
Supplier G	Australian wealth management company	No publicly available policies	More than \$190,000
Supplier H		No publicly available policies	

Details of the external cleaning contractors were provided and due diligence checks conducted on these Tier 2 suppliers (engaged by the property management suppliers). ACU's Properties and Facilities team provided details of two external suppliers:

Supplier 1 had been engaged in industrial action in 2002, but there were no indications of labour exploitation of their subcontracted workers.

Supplier 2 had strong governance mechanisms in place to monitor worker conditions and grievances.

This exercise provides an important insight into ACU's property management suppliers' mechanisms to reduce modern slavery risk, while highlighting significant gaps revealed in those with no policies and safeguards. It also emphasises the importance of seeking visibility beyond the Tier 1 supplier base (in this case the Tier 2 cleaning contractors) to monitor whether ACU's high Tier 1 standards are being sought and delivered.



Modern slavery action plan and road map

ROADMAP OF AREAS REQUIRING FURTHER ACTIVITY

The roadmap below is based on areas identified through ACU's ongoing maturity assessment process (refer to Criterion 5) and indicates key areas of activity required to be implemented. It summarises ACU's current position and indicates where additional undertakings are required.

MANAGEMENT SYSTEMS	HUMAN RESOURCES AND RECRUITMENT	PROCUREMENT AND SUPPLY CHAIN	RISK MANAGEMENT	CUSTOMERS AND STAKEHOLDERS
ACU Senate and management commitment to anti-modern slavery (AMS).	Management across ACU is aware of MS. Further involvement through planned training platforms to extend this knowledge.	AMS requirements have been incorporated into processes and tender and contract documentation. Need to be reviewed and updated as necessary.	MS risks have been captured in ACU's formal risk management system. The documented risks are to be periodically reviewed and actioned as required under ACU's risk management protocols.	ACU's customers are students and stakeholders, who are themselves underpinned by the Sustainability Bond. The mission and values espoused by ACU make AMS initiatives of critical interest and importance to its customer and stakeholder base. ACU will continue to engage with these vital groups to present our activity in this area.
Further integration into business processes is required.	Key staff including senior managers and directors have been involved in supplier training workshops and have undergone training themselves.	More formalised mechanism to assess MS risks to be considered for inclusion into sourcing and contracting activities. All new suppliers now required to complete comprehensive MS questionnaire. ACU membership of UPH and increased use of UPH specialised procurement services.	Some aspects of the key supply chain could be susceptible to MS risks, especially in: the construction sector due to the large amount of capital infrastructure underway; critical facilities services, such as cleaning and security; and key commodity supplies such as apparel and computers (including computer recycling and e-waste services). Although these are understood and monitored accordingly, ACU will continue to be vigilant in these aspects of our supply chain.	ACU is keen to openly share our AMS activities through various public forums. This includes this statement, the ACU Tender Portal when that function is developed, the Catholic Archdiocese newsletters and other publicly available media. In doing so, suppliers will not be named, confidential information will not be shared, and the privacy of entities with which ACU has dealings will be respected.
Further action is required to educate suppliers and verify their AMS initiatives.	Two training modules developed with ACAN have been made available to all staff and made mandatory for certain groups, including managers and those who make purchasing and procurement decisions.	ACAN and AUPN tools, in conjunction with other data analysis tools, are to be used to provide updated supplier and spend MS risk assessments, including the use of specialist service providers.	Risks in the extended supply chain are to be monitored via the industry-based tools being made available to ACU from both ACAN and the AUPN	ACU is to develop a more formalised mechanism to receive feedback about MS issues from inside the university as well as from suppliers.
Development of organisational and supply chain reporting of modern slavery (MS) risks.	Hiring policies and HR systems to be further reviewed to ensure key requirements relating to AMS initiatives are incorporated.	Tools being developed to ensure AMS initiatives and requirements are made readily available to all suppliers to ACU, including via ACU eMarketplace's upcoming supplier self-tagging of catalogue products regarding their MS compliance.	MS risks are reported through the ACU risk management system. Other reporting mechanisms will be considered for development.	ACU needs to consider what methods may be appropriate to allow direct communication with workers in supply chains. Workers need to feel safe to speak candidly, privately and not feel threatened
	AMS initiatives are made known during recruitment and to relevant agencies. Needs review to ensure existing practices are adequate.	The above tools will enable supplier MS risks to be monitored, and corrective actions taken to address concerns where they arise.		
		A continuing effort to engage with, and provide opportunities to, certified fair-trade organisations.		

Criterion 5: Effectiveness assessment

Continuous improvement – ACU Sedex SAQ scoring

Collaboration is at the heart of accelerating progress. This also includes opportunities to comparatively measure social, environmental and governance (business ethics) risks and actions with peers in our network.

In its foundational stages, ACU used an internally devised ACAN framework to measure progress. This bespoke approach reflected the unique priorities, constraints and practices across Catholic organisations. In 2024, an ACAN maturity assessment measurement tool was introduced, the results of which were incorporated into that reporting period's statement. In 2025, the ACAN program adopted

a globally recognised risk measurement system through Sedex. This aligns reporting entities with a methodology that combines global data about risks in different countries and industries with site-specific information from the Sedex platform. Sedex regularly updates the methodology to ensure it is aligned with new and emerging risks. Therefore, completion of the Sedex SAQ by ACU suppliers is a substantial measure of continuous improvement year on year. Below is an explanation of how scoring is calculated using the Sedex SAQ and ACU's 2025 risk scores and management controls that will serve as our benchmark for continuous improvement.

ACU 2025 Sedex Risk Score - Explanation and results

0 = Low risk – 10 = High risk

ACU SEDEX COMBINED RISK SCORE: 3.4/10 (Low Risk)

Calculated from inherent risk scores plus ACU site characteristics, adjusted for management controls and audit results. The score is broken down by pillar and highlights strengths and opportunities to focus our efforts on key areas that drive ethical and sustainable practices.

INHERENT (COUNTRY/REGION/ SECTOR) RISK SCORES

These scores predict potential risks based on a country/region and sector and can be used as a baseline to identify and prioritise areas for improvement in operations. These scores show the natural risks of doing business in a specific country or sector and do not include any details about individual sites.

Labour standards pillar – ACU's score: 2.9/10 (Low Risk)

Assesses location and industry factors that could increase labour risks, such as vulnerable worker populations or high rates of workplace violations.

Health and safety pillar – ACU's score: 2.4/10 (Low Risk)

Considers regional and industry-specific health and safety risks, including local regulations and industry accident rates.

Business ethics pillar – ACU's score: 1.8/10 (Low Risk)

Assesses industry and location risks related to unethical practices, such as high corruption levels or weak regulatory oversight.

Environment pillar – ACU's score: 3.6/10 (Low Risk)

Examines the environmental impact of the site's industry and location, such as pollution levels or resource use that may create regulatory or compliance risks.

ACU SEDEX SITE CHARACTERISTICS RISK SCORES

Highlight potential risks based on ACU's SAQ responses in the labour standards and health and safety pillars. These scores can be used to assess and support the implementation of policies and processes that mitigate workplace

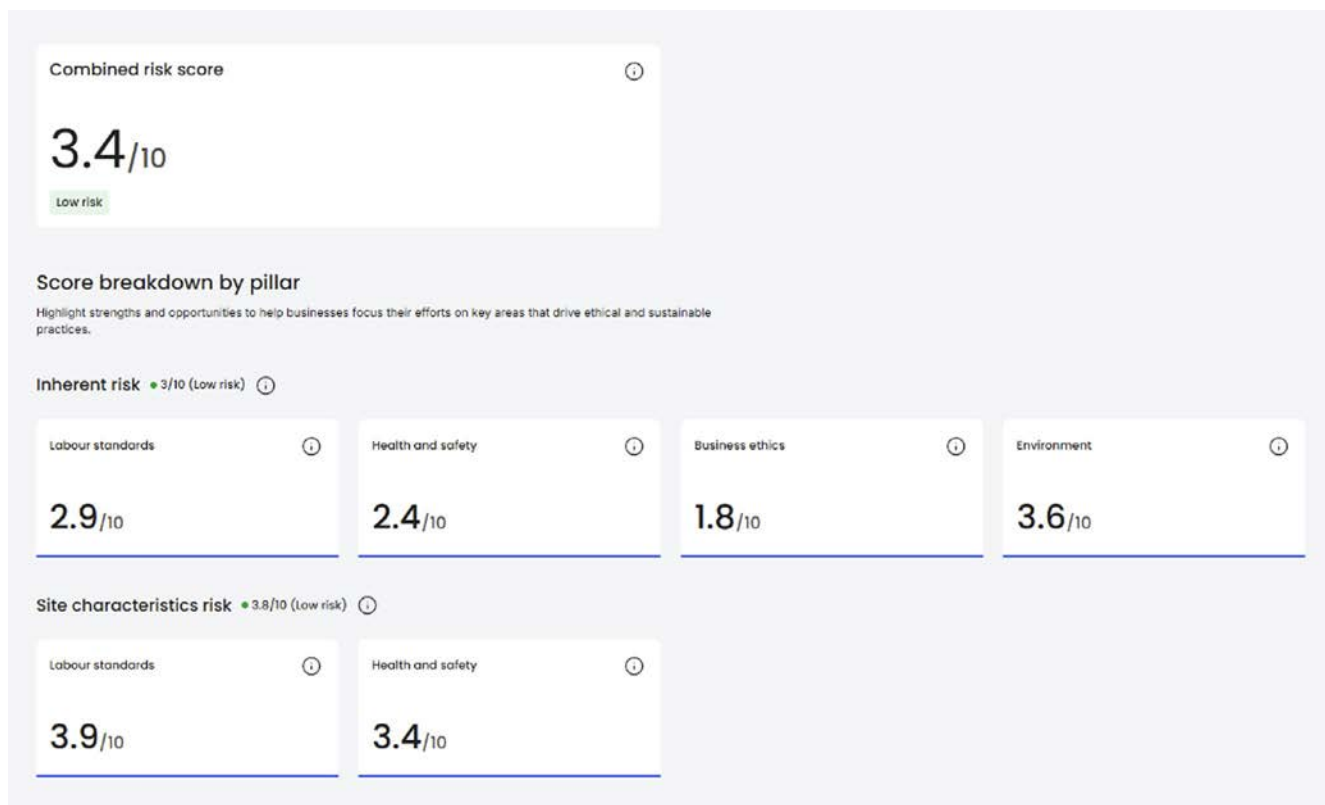
risks within ACU's supply chain. The Environment site characteristics consider the type of work, business and location (eg proximity to sensitive areas). For the Core pillars below, risks are assessed based on the nature of the work, such as exposure to heavy machinery or hazardous materials.

Labour standards pillar – ACU's score: 3.9/10 (Low Risk)

Reflects labour-related risks like employment practices, workers' rights and wages based on SAQ responses. High-risk activities in this area can raise the score.

Health and safety pillar – ACU's score: 3.4/10 (Low Risk)

Based on SAQ responses to questions about site-specific health and safety factors, such as equipment usage, handling of chemicals or accident risks.



ACU 2025 Sedex Management Controls Scores - Explanation and results

0 = Low score – 5 = High score

ACU SEDEX COMBINED MANAGEMENT CONTROLS SCORE: 3.8/5 (GOOD)

These scores measure how well policies or processes are in place to reduce the risks from the site characteristics. They are based on answers to ACU's Sedex SAQ. Poor scores of 0 – 0.9 indicate that there are few or no controls in place. Advanced scores of 4 – 5 indicate there are exemplary controls which exceed compliance and drive innovation. Key pillars are described below, with the diagram showing the range of pillars taken into consideration.

Labour standards pillar – ACU's score:

3.7/5 (Good)

Evaluates policies and processes to ensure fair labour standards and worker protections are effectively managed.

Health and safety pillar – ACU's score:

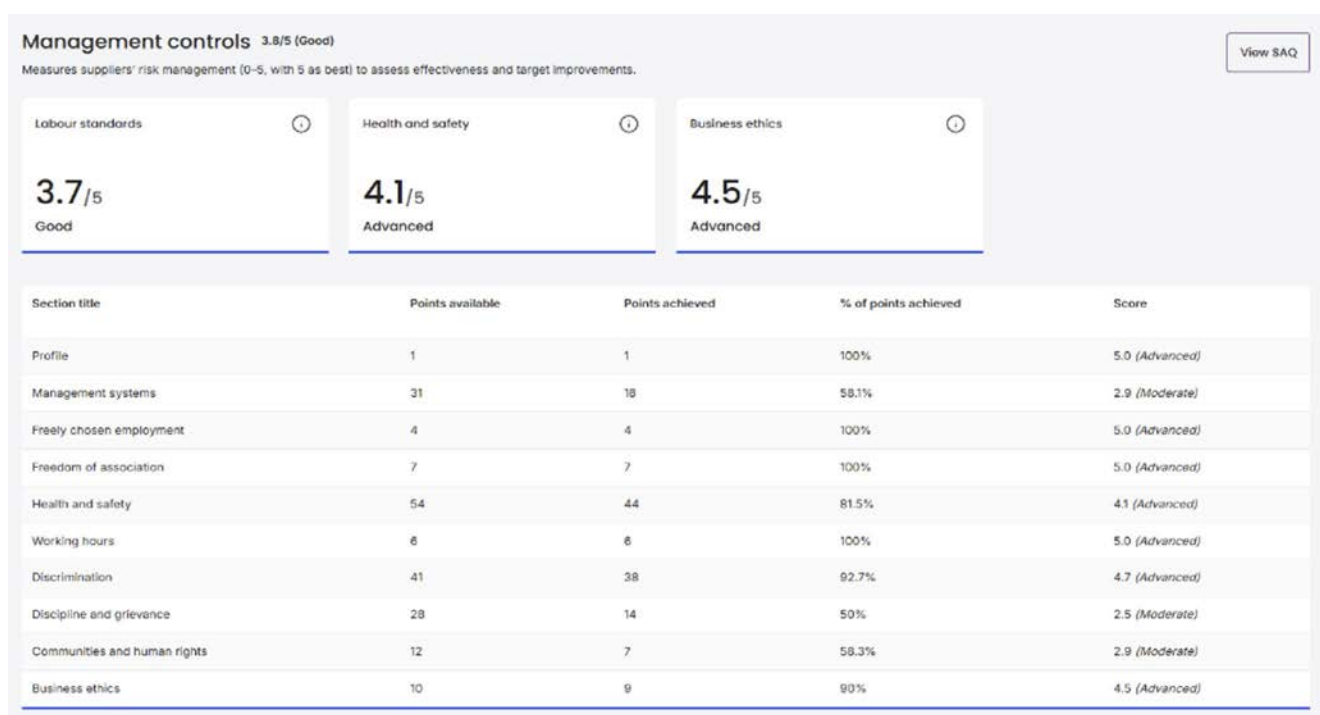
4.1/5 (Advanced)

Reviews the adequacy of safety protocols, emergency preparedness and training efforts to manage health and safety risks on site.

Business ethics pillar – ACU's score:

4.5/5 (Advanced)

Evaluates controls against unethical practices such as anti-bribery policies, compliance with legal standards and transparent operations.



Measures to assess effectiveness of anti-modern slavery actions – in use or in development

The following measures are aimed at assessing the effectiveness of anti-modern slavery measures and requirements, with respect to both Tier 1 suppliers and other suppliers further along the overall supply chain:

- inclusion of stipulated contract review meetings and measurement of performance against key performance indicators, in all significant ACU contracts
- self-reporting of suppliers against industry sector databases where they exist (eg Sedex)
- use of third-party tools to investigate and assess anti-modern slavery performance (eg Sedex)
- use of ACU reporting tools to receive information about performance (eg use of the ACU Tender Portal)
- receipt and assessment of supplier action plans designed to ensure modern slavery practices are avoided within the supply chains of Tier 1 suppliers

These measures apply to all ACU campuses and operational personnel. The national and state managers are responsible for our campuses in Australia.

ACAN-generated ACU baseline data table

The ACAN-generated ACU baseline data table provides a comparative measure of supplier engagement and program activities to measure progress and inform future action planning. The 2025 result, as compared with 2024, is as follows:

ACTIVITY	2024	2025
INTERNAL / STAFF		
Hours spent on modern slavery activities	720	1,310 (increased hours due to work of specialist MS supplier compliance resource)
Number of staff completed at least one module of modern slavery e-learning	468 c	812c
E-learning modules completed in total = Module 1, Module 2 and Module 3 (an advanced role-specific module newly introduced in 2025).	897 c	1,621c
EXTERNAL/SUPPLIER ENGAGEMENT		
Number of ACAN Supplier Surveys completed	276c	492c
Number of suppliers invited to join Sedex	85c	136c (includes a number of targeted joint ACU/ACAN and ACU-direct invitations to highest risk and highest spend suppliers)
Number of suppliers that Joined Sedex	37c	89c (refer ACAN Supplier Engagement Diagram for 2025 spend only figure = 75)
Number of ACU suppliers with Sedex SAQ completed	8c	51c
Total number of non-conformances and non-compliances (NCs) remediated by ACU suppliers as identified during SMETA social compliance audits. Increased NC numbers are a direct result of increased site level due diligence activities. NCs identified can be across a broad range of areas, as per the SMETA standard.	0	32
DOMUS 8.7 EXTERNAL REFERRALS		
Contacts made via worker voice/grievance mechanism – FairCall external whistleblowing service.	24	0
Numbers shown are as instances recorded prior to any investigation or explanatory information being sought.		
Referrals for advice and assistance	0	0
Individuals identified or referred for modern slavery assessment	0	0
Individuals with modern slavery cases remediated	0	0

Note: c = cumulative total

Criterion 6: Process of consultation with entities owned or controlled

ACU does not own or control any other entities and therefore this criterion is not applicable.



Criterion 7:

Other relevant information

ACU sponsors SCBN's Anti-Slavery Commissioner event, 'Putting Modern Slavery out of Business'

In November 2025, ACU sponsored the Sydney Catholic Business Network (SCBN) lunch and panel discussion, at which the Australian Anti-Slavery Commissioner Chris Evans spoke of his plan to strengthen the national response to modern slavery, and commended the Catholic sector's actions and leadership in relation to modern slavery.

"Through the Australian Catholic Anti-Slavery Network and Domus 8.7, the Catholic sector has become a national leader in implementing the Modern Slavery Act," said Mr Evans. "Together, through these initiatives, you are translating legal obligations into meaningful action, protecting workers and building the capacity of teams and suppliers across Australia."

The Commissioner also spoke of: "the privilege to be with so many leaders across Catholic health, education, social services, finance and community sectors – those who carry forward a long tradition of service, grounded in human dignity and the common good."

ACAN Lived Experience consultant Moe Turaga shared his lived experience of modern slavery and advocacy for improved responses.

ACAN/Domus 8.7 Program Manager, Jenny Stanger, provided an overview of both organisations, the Catholic response to modern slavery and the Modern Slavery Act 2018.

The event attracted 280 attendees, with a number of ACU senior executive in attendance.



Image Credit: Giovanni Portelli







Cabrine Australia Limited

MODERN SLAVERY REPORTING STATEMENT 2025

PUBLISHED JUNE 2026



*"True peace begins with the recognition and protection
of the God-given dignity of every person"*

Pope Leo XIV

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Board approval

This Modern Slavery Statement is for the reporting entity, Cabrini Australia Limited, for the actions taken during the 2025 calendar year. This statement is made in accordance with the Modern Slavery Act 2018 (Cth) and was approved by the Cabrini Australia Limited Board, as the principal governing body of Cabrini Australia Limited and all entities owned or controlled by Cabrini Australia Limited, on 28 May 2026.

Disclosure notes

This statement has been made on behalf of Cabrini Australia Limited (ABN 42 624 828 306). This statement covers all entities owned or controlled by Cabrini Australia Limited (collectively referred to in this statement as ‘Cabrini’), who are governed in common by the Cabrini Board. This statement is intended to read in conjunction with Cabrini’s statement for previous years.



STATEMENT FROM THE CHAIR AND THE CHIEF EXECUTIVE

Cabrini Australia remains committed to ethical, responsible and transparent business practices across all areas of our organisation and supply chain. Central to this commitment is ensuring we take meaningful action to identify and address the risks of modern slavery, forced labour and human trafficking.

Grounded in our values of compassion, integrity, courage and respect, we continue to strengthen our modern slavery framework through increased staff education, deeper supplier engagement and ongoing improvements to governance and due diligence processes.

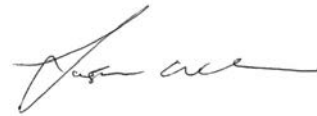
Throughout 2025, we focused on increasing organisational capability and engagement with higher-risk suppliers. Through dedicated training modules, due diligence regarding suppliers and increased time invested in modern slavery awareness initiatives, we are proud to have achieved an uplift in user education and awareness.

Looking ahead, 2026 will mark a significant milestone in Cabrini's Next Era redevelopment program with the commencement of construction on the new East Building at our Malvern campus. As activity increases, a key priority will be strengthening engagement, audits and due diligence with suppliers operating in higher-risk construction categories.

As part of our commitment to transparency and accountability, this Modern Slavery Statement for the 2025 calendar year will form part of the Australian Catholic Anti-Slavery Network (ACAN) Compendium. It outlines the progress achieved to date and our commitments for 2026 and beyond.



Sylvia Falzon
Cabrini Australia Board Chair



Sue Williams
Cabrini Australia Chief Executive



Criteria 1 | About us

OUR IDENTITY AND MISSION

Cabrini is a large, private, Catholic charitable organisation inspired by the spirit and vision of Saint Frances Xavier Cabrini and the Missionary Sisters of the Sacred Heart of Jesus (the 'Cabrini Sisters').

Delivering quality, compassionate care to our patients and residents is the primary focus of our work and at the heart of everything we do. As a not-for-profit health service, all surpluses are used to develop Cabrini's services and facilities to provide the best possible care for patients and families.

Cabrini Health is supported by the work of Cabrini Technology, Cabrini Research, Cabrini Outreach and Cabrini Foundation. While each division is unique, Cabrini shares a common vision and takes a singular approach to modern slavery across our organisation.

Our mission

- **Who we are:** We are a Catholic healthcare service inspired by the spirit and vision of Mother Cabrini and the Missionary Sisters of the Sacred Heart of Jesus
- **What we believe:** We are a community of care, reaching out with compassion, integrity, courage and respect to all we serve.
- **What we do:** We provide excellence in all of our services and work to identify and meet unmet needs

CABRINI'S COMMITMENT

Cabrini first became aware of the horror and tragedy of human trafficking, which is often driven by the need for forced labour, through the work of the Missionary Sisters of the Sacred Heart of Jesus (the "Cabrini Sisters") and UNANIMA International.

UNANIMA is a not-for-profit organisation that started in 2002 as a coalition of congregations of religious sisters, of which the Cabrini Sisters were early members. UNANIMA's mission is to advocate at the UN for the rights of women and children, particularly those living in extreme poverty.

Through UNANIMA's work, we began to understand how we can unwittingly contribute to the global problem of modern slavery through uninformed purchasing and to recognise that each of us has a role to play in stopping exploitation.

Eliminating human trafficking is one of Cabrini's three social justice causes and we take our responsibility to eliminate the risk of modern slavery both here in Australia and internationally very seriously.

Cabrini's modern slavery action plan has progressed from the establishment of governance frameworks to further exploration of operations and supply chain to identify risks and proactively work with suppliers to close identified issues. We continue to focus on educating and training staff who engage directly with suppliers. Cabrini is also ready to confront more urgent issues as they become apparent.

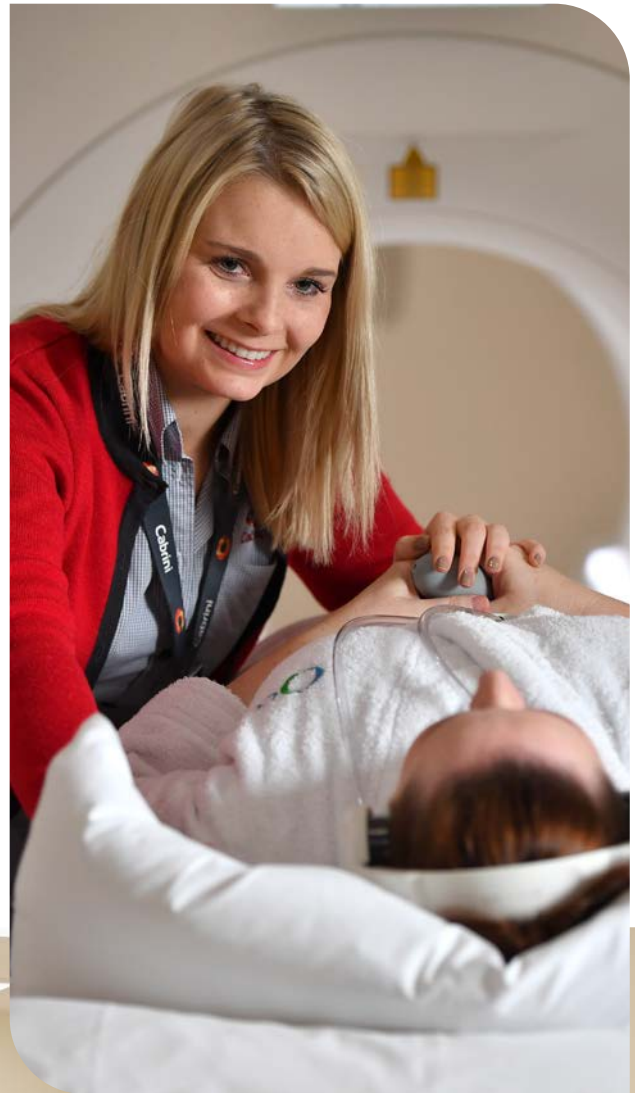
For more details on previous activities, please refer to previous statements.

OUR ORGANISATION

Cabrini Australia Limited is a not-for-profit group of companies, which is owned and sponsored by the Missionary Sisters of the Sacred Heart of Jesus. Cabrini Australia Limited is the Cabrini reporting entity for the purposes of the Modern Slavery Act 2018 (Cth).

Other entities owned or controlled by Cabrini Australia Limited and covered by this Modern Slavery Statement include:

- Cabrini Health Limited (ABN 33 3370 684 005)
- Cabrini Property Limited (ABN 31 634 130 653)
- Cabrini Outreach Limited (ABN 91 637 994 720)

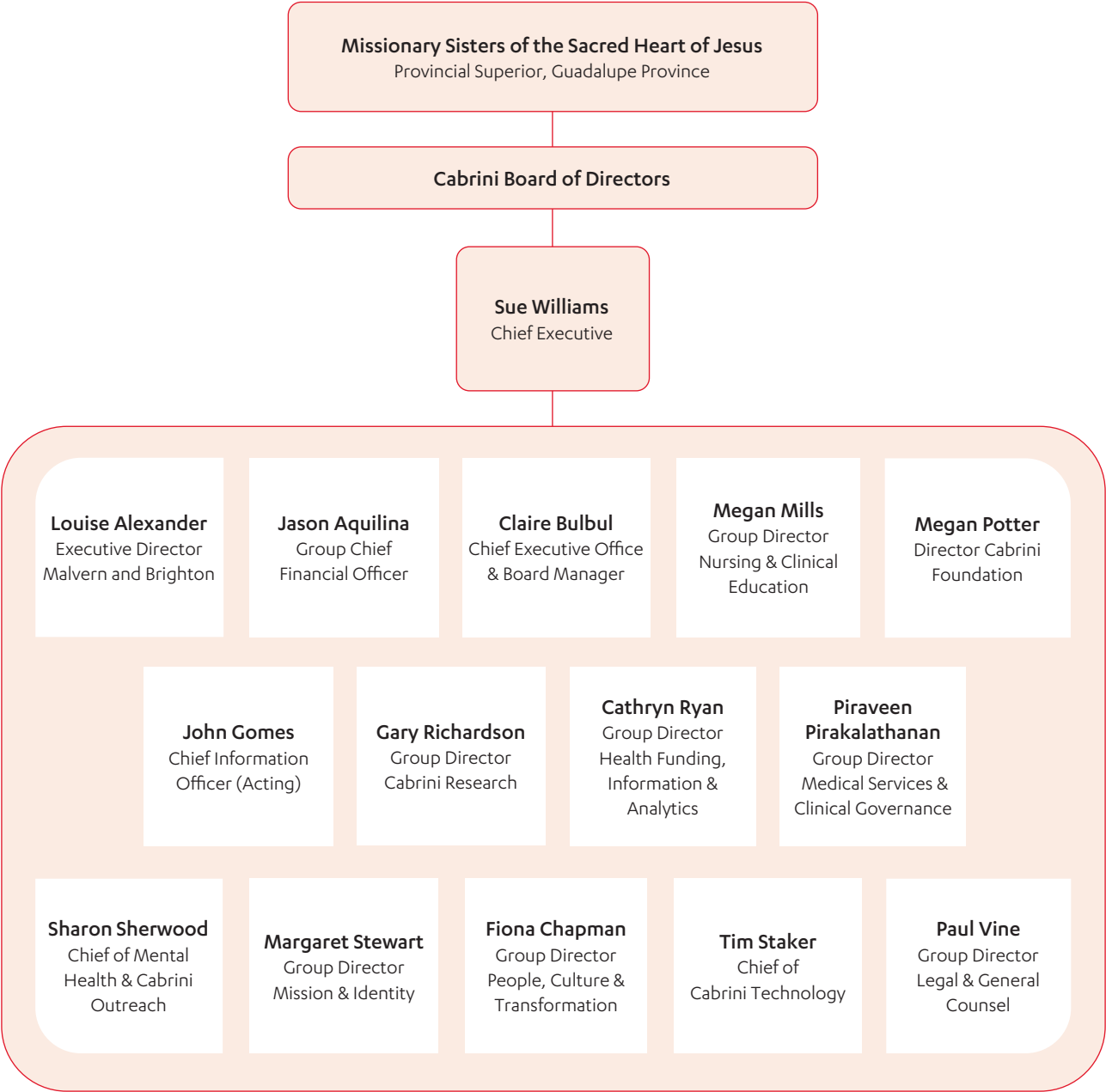


Criteria 2 | Our management and governance

Cabrini’s day-to-day operations are managed by an experienced executive team that supports our Chief Executive. Cabrini’s Board oversees the strategic direction of our organisation and ensures appropriate governance structures are in place to comply with our legal and legislative requirements, including those under the Modern Slavery Act 2018 (Cth).

The Cabrini Modern Slavery Working Group, which is sponsored by the Chief Financial Officer, reports to the Board and the Audit and Risk Management Board sub-committee on its activity and outcomes to ensure the highest levels of control are in place across our organisation taking into consideration the work of each Division.

Our current organisation structure as at April 2026:



OUR OPERATIONS

Cabrini employs more than 3995 staff and engages more than 1100 visiting medical officers.

Cabrini provides essential healthcare services and delivers a comprehensive range of high-quality acute, subacute, palliative care, primary care, diagnostic and community-based health services across its campuses, including our acute hospitals, women’s only mental health hospital, and outpatient health facilities.

Our services span cancer care, cardiac services, orthopaedics, neurology, urology, paediatrics, emergency care, maternity services, palliative care, community care and women’s mental health.

The Australian Private Health Sector continues to face a multitude of challenges and Cabrini has continued to provide a high level of service as part of our healthcare operations:

Indicator	2021-22	2022-23	2023-24	2024-25
Inpatient care episodes	86,780	99,019	92,056	96,628
Surgical operations	49,013	51,830	54,203	53,489
Babies delivered	2061	1984	1911	1938
Emergency department attendances	25,181	25,349	25,649	24,570
Medical images	133,441	142,322	136,497	143,028
Day oncology patient treatments	23,040	23,370	23,374	24,205

OUR SUPPLY CHAIN

Cabrini remains committed to ensuring that our acquisition of goods and services is ethical, transparent, fair and responsible.

Cabrini sources products and services for use in its Health operations mostly through local businesses or local subsidiaries of global businesses, while Cabrini Technology Group sources products and services through local and overseas businesses.

Procurement across Cabrini is covered by the same process framework. Our procurement process requires, to the extent possible, all suppliers to

comply with our Ethical Sourcing Code, ensuring our suppliers share and support our commitment to ethical and responsible sourcing and trading of goods and services.

In 2025, Cabrini engaged with 1994 suppliers and transacted \$286,602,000 on purchased goods and services.

Cabrini is also a member of the Catholic Negotiating Alliance – a network of Catholic healthcare providers that are authorised by the ACCC to collectively bargain with suppliers.

Criteria 3 | Modern slavery risks

RISKS OF MODERN SLAVERY IN OUR OPERATIONS AND SUPPLY CHAINS

For Catholic entities, modern slavery risks are defined by the ACAN Category Risk Taxonomy, a classification standard that identifies severity of actual or potential harm to people (saliency) in spend categories.

The ACAN Category Risk Taxonomy is based on sources such as the:

- Global Slavery Index
- International Labor Organisation (ILO), including definitions of modern slavery
- Bureau of International Labor Affairs (ILAB), U.S. Department of Labor
- Global Child Forum and UNICEF

Five key factors are also used to determine the level of risk:

- **Geography:** the country or location where the goods are made or service is delivered
- **Industry:** the sector in which the making of goods or delivery of service occurred
- **Commodity:** the raw materials or components that comprise the goods or products
- **Workforce vulnerability:** such as bonded visas, temporary migrants, women or children known to be employed in specific industry sectors
- **Domus 8.7 remediation service:** the trends, cases, and risk intelligence identified, including grievances and remediation insights relevant to category and risk to workers.

Our action plan is informed by ongoing risk assessments, which continue to identify a high inherent modern slavery risk across several areas of Cabrini’s supply chain. In 2025, this remained particularly evident within medical devices and labour suppliers, alongside increasing exposure within the building and construction sector as redevelopment activity across our sites continues to progress, as shown in Figures 1, 2 and 3 below:

Figure 1 | MODERN SLAVERY RISK TAXONOMY OF SPEND

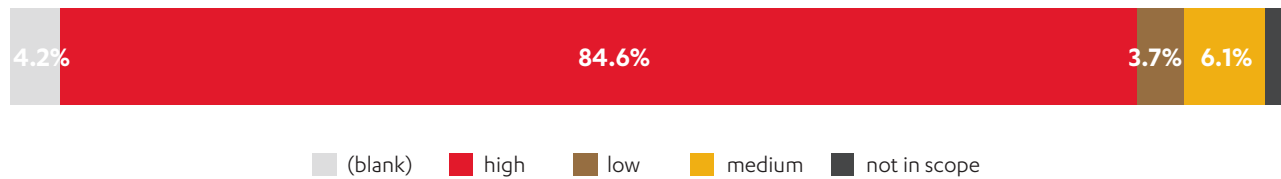
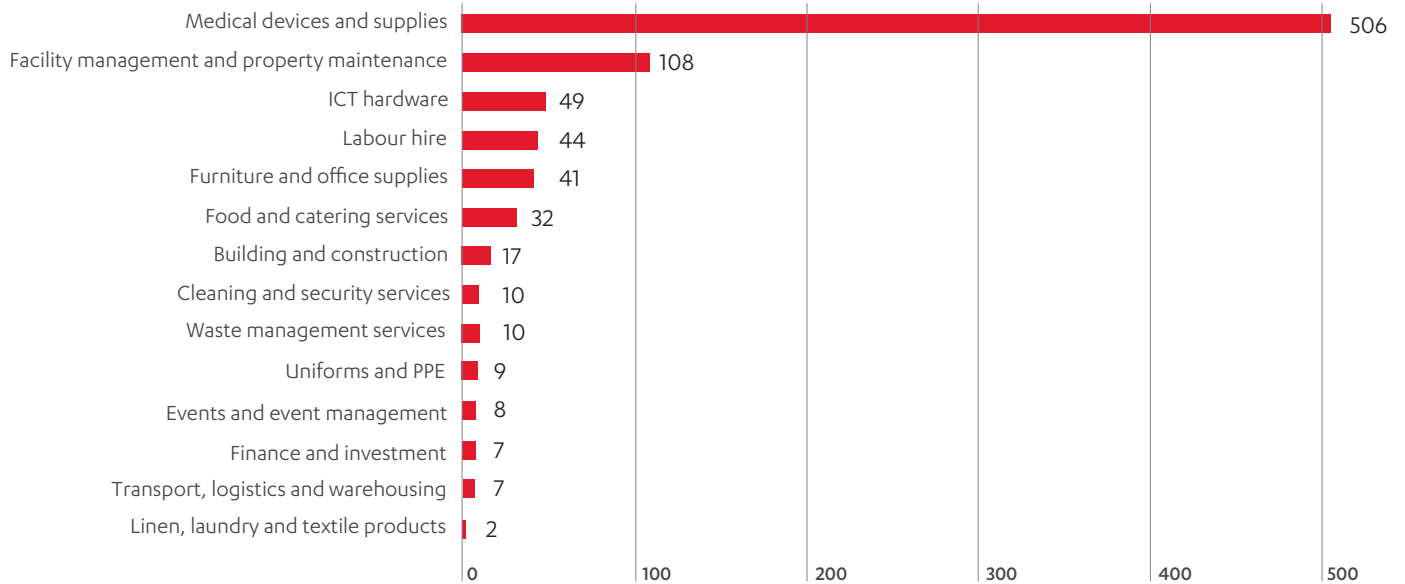
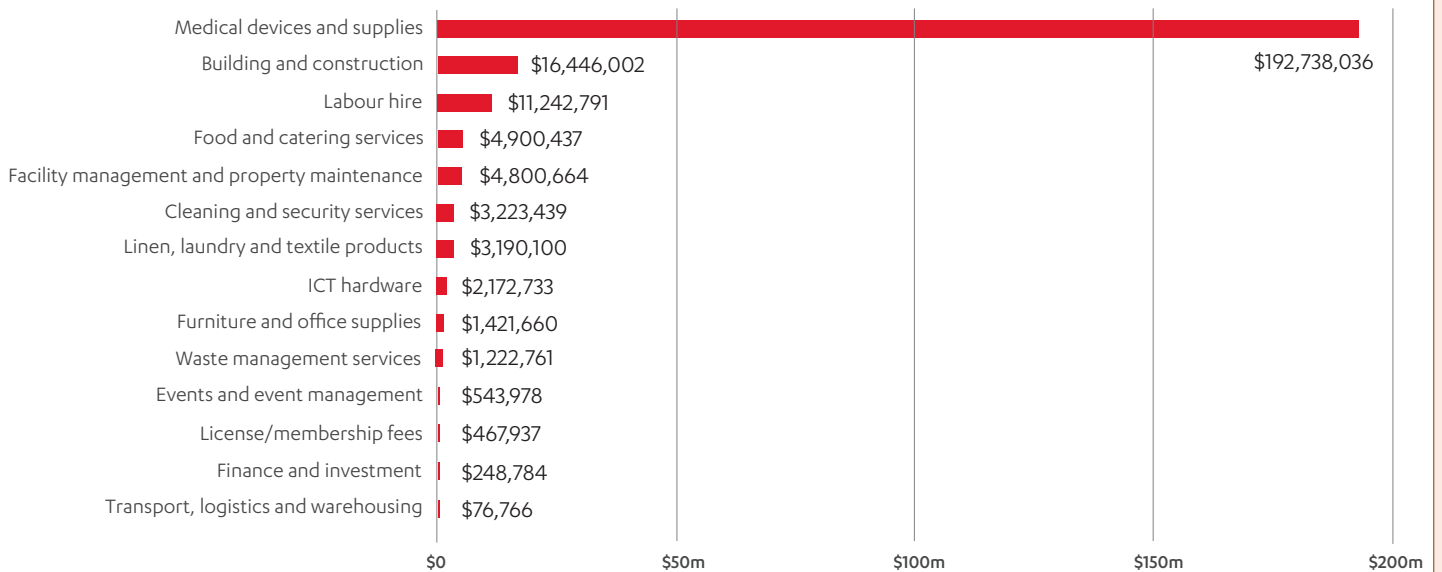


Figure 2 | NUMBER OF SUPPLIERS IN HIGH-RISK CATEGORIES FOR MODERN SLAVERY**Figure 3 |** PROCUREMENT SPEND PROFILE IN HIGH-RISK CATEGORIES FOR MODERN SLAVERY

Criteria 4 | Our actions to assess and address modern slavery risks

Cabrini continues its commitment to address modern slavery risks within our Operations and Supply Chain through its engagement and work with ACAN. During 2025, Cabrini made the commitment to increase education and training within our supply chain, increase engagement with high-risk suppliers through the completion of SAQs and audits and enhance our supply chain maturity rating.

Through training units and hours spent on modern slavery statement activities and supplier engagement we have achieved an uplift of 20 per cent in user education. Further work is required to formalise mandating of training requirements for those staff members engaging with suppliers. Through the ACAN network, our supplier base engaged on the Sedex platform grew (invitations went up from 92 to 134 and new suppliers joining increased from 94 to 110) with a positive uptick in SAQ completions growing from 96 in 2024 to 141 in 2025.

This growing engagement and review of the supply chain provides Cabrini assurance that during 2025 and beyond, ACAN's infrastructure and model is providing a strong foundation for keeping Cabrini's overall risk of a modern slavery incident to low.

Remediation

Cabrini is committed to ensuring remediation where harm is identified. Where we cause an adverse impact, we will cooperate in remediation. Where we contribute to an impact, we will work collaboratively with relevant entities to prevent, mitigate and remediate the harm in proportion to our contribution. Where an impact is directly linked to our operations through a business relationship we will use our leverage to seek meaningful remedy for affected people and strengthen our controls to prevent any repetition of harm.

Through the ACAN Modern Slavery Risk Management Program Cabrini has access to the Domus 8.7 Modern Slavery Remediation Service.

Domus 8.7 provides:

- resources that enable us to listen to workers (grievance channel)

- a 24/7 careline for workers on our sites, staffed by professional counselors
- direct support to people impacted by modern slavery
- guidance and technical assistance to prevent, identify and remediate modern slavery
- a documented process to assess if an organisation has caused, contributed or is directly linked to modern slavery and modern slavery indicators

Domus 8.7 empowers people impacted by modern slavery to have choice and control over what forms of remediation are meaningful to them and to engage safely with business/supply chain actors. Supports may include:

- access to interpreters
- modern slavery indicator assessment
- needs assessment, case coordination, response and remediation planning
- referrals to community, social services, unions
- transport, accommodation, financial and food support
- legal support, referrals, accompaniment and advocacy
- job training, retraining and redeployment
- accompaniment and advocacy to engage with government and law enforcement agencies
- opportunities to contribute lived expertise to improve modern slavery responses and mitigate future risks

The Domus 8.7 Advisory Committee Members also include a person with lived expertise, Mr Moe Turaga. Domus 8.7 is a registered charity with the Australian Charities and Not-for profits Commission (ACNC) and is an endorsed Public Benevolent Institution with Deductible Gift Recipient (DGR) status. ABN 244 72497189

Criteria 5 | Assessing the effectiveness of these actions

The mechanism by which Cabrini and the ACAN network measure our effectiveness and maturity of our modern slavery framework has evolved in 2025 with conversion to using the outputs from the Sedex platform to measure our overall rating.

In 2025, Cabrini achieved an overall risk score of 3.6 out of 10. This score places us in the low-risk range. The overall score is the culmination of the following pillars:

- Inherent risk (3.4/10 low-risk)
- Site characteristics risk (3.8/10 low-risk) and;
- Management controls (3.7/5 good)

This overall risk score is a reflection that through our ACAN involvement and our internal measures and governance, we have a progressing framework that is controlling risk and positions Cabrini to respond immediately to any breach should it arise.



	ACTIVITY	2024 Cabrini Health	2025 Cabrini Health
EXTERNAL / SUPPLIER ENGAGEMENT	Total number of suppliers	2106	1994
	Number of suppliers with visible contact information and ABN	80	70
	Number of suppliers across high-risk categories	436	850
	Number of ACAN Supplier Surveys completed	431	583
	Supplier staff attending capacity building webinars	70	22
	Invited to join Sedex	92	134
	Joined Sedex	94	110
	Sedex SAQ completed	96	141
	Social audits	18	6
	Corrective actions	81	49
DOMUS 8.7 EXTERNAL REFERRALS	Contacts made via worker voice / grievance mechanism	0	0
	Referrals for advice and assistance	0	0
	Individuals identified or referred for modern slavery assessment	0	0
	Individuals with modern slavery cases remediated	0	0

OUR MODERN SLAVERY COMMITMENT

In the 2026 calendar year, Cabrini will:

- Increase audits and engagement with high-risk category suppliers in the construction and uniforms sector in line with redevelopment projects and a clinical staff uniform refresh
- Implement new training material across the business, including auditing transactions and contracts to capture new staff requiring enrolment into modern slavery units
- Conduct an audit of all high-risk supplier contracts, ensuring existing modern slavery clauses are accurately reflecting current legislation and rectifying any contracts that require updating



Criteria 6 | Consultation with owned or controlled entities

Through assessment of overall risk and spend across Cabrini Australia Limited, minimal consultation across the other entities occurs with the supply chain of Cabrini Health being the focal point of reviews and initiatives. The company is centrally lead ensuring that overall governance and controls sit across all entities.



Criteria 7 | Any other relevant information

No other relevant information

Modern Slavery Statement 2025

1 January 2025 – 31 December 2025





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Leadership Message

At Calvary, our mission to bring the healing ministry of Jesus through Being for others extends beyond the people we care for, to those who help deliver that care across our operations and supply chains. In 2025, we strengthened our modern slavery risk management program, focusing on better data, deeper supplier engagement, and stronger remedies for workers who may be at risk.

Over the reporting period we:

- Increased staff capability, with 357 e-learning completions focused on modern slavery awareness and escalation pathways.
- Deepened supplier transparency via the Australian Catholic Anti-Slavery Network (ACAN) program, achieving 1,019 ACAN supplier surveys (cumulative), improving our visibility of labour practices and upstream sourcing.
- Expanded participation on Sedex: 154 suppliers identified for onboarding; 115 joined Sedex; 132 Self-assessment questionnaires (SAQs) completed, enabling more consistent, comparable risk data and remediation follow-through.
- Reviewed 48 social audits that produced 438 findings across wage, hours, health and safety, and recruitment practices—driving corrective action plans and targeted supplier engagement.
- Enhanced third-party supplier screening with 529 completed screens (prioritising high and medium risk suppliers) to capture regulatory, labour and ethical non-compliance signals earlier in the process.

We are grateful for the collaboration of ACAN and the independent Domus 8.7 remediation service, which strengthens our capability to support workers through victim-centred pathways. Our commitment remains clear: when risks are identified, we act; when indicators are present, we investigate; when harm occurs, we seek to participate in effective remedy.

This 2025 Statement reflects measurable progress since last year and sets out our next steps to build a resilient, worker-centred program across all Calvary entities.

This Modern Slavery Statement was approved by the principal governing body of Little Company of Mary Health Care Ltd as defined by the Modern Slavery Act 2018 (Cth) ('the Act') on 26 June 2026. This Modern Slavery Statement is signed by a responsible member of Little Company of Mary Health Care Ltd as defined by the Act.



Greg Cooper
Board Chair, Calvary Health Care



Damien Bruce
Chief Executive Officer, Calvary Health Care



Criteria 1: About Calvary

About Us

In November 2025, Calvary celebrated a significant milestone: 140 years of care in Australia (1885–2025).

Calvary's story began on 4 November 1885, when six Sisters of the Little Company of Mary arrived in Sydney to continue the mission of their founder, Venerable Mary Potter. Guided by a deep commitment to compassion, dignity and service, the Sisters came to walk alongside those who were sick, dying and most vulnerable.

From these humble beginnings, Calvary has grown into a national health, aged and home care organisation. Today, Calvary delivers services through public and private hospitals, residential aged care homes, retirement living communities, and home care centres across Australia. While the scale and complexity of our services have evolved over time, the spirit and purpose that guided the founding Sisters remain unchanged.

Our 140th anniversary theme — 140 Years of Care. A Future of Hope — honours this enduring legacy and reflects our commitment to carrying it forward as we respond to contemporary challenges and the evolving needs of the communities we serve.

This Modern Slavery Statement is made on behalf of Little Company of Mary Health Care Ltd (Calvary) and covers all entities owned or controlled by Calvary, consistent with the scope of previous statements.

Our Vision and Values

As a Catholic health, aged and community care provider, Calvary's vision is to excel and to be recognised as a continuing source of healing, hope and nurturing to the people and communities we serve.

Our mission is to bring the healing ministry of Jesus to those who are sick, dying and in need through Being for others, inspired by the Spirit of Mary standing by her Son on Calvary. This mission is lived out through the provision of quality, responsive and compassionate care, grounded in the values and the heritage of the Sisters of the Little Company of Mary.

Our values are visible in how we act and treat each other.

Calvary is guided by the values of:

- **Hospitality** – reflects our responsibility to welcome all who come into contact with our services, promoting connectedness, listening openly and responding with care so that people feel valued and that they belong.

- **Healing** – expresses our commitment to caring for the whole person — spiritually, psychologically and physically — and to fostering healing through reconnection, reconciliation and relationship-building.
- **Stewardship** – recognises that all we have has been entrusted to us as a gift. We are responsible for using our resources wisely and sustainably, striving for excellence, caring for our environment, and faithfully handing on the tradition of the Sisters of the Little Company of Mary.
- **Respect** – affirms the inherent dignity of every person associated with our services. We are committed to acting with justice and compassion in all circumstances and to challenging behaviour that is contrary to our values.

These values shape how we care for patients, residents and clients, how we work together as colleagues, and how we engage with those who support our mission through our operations and supply chains.

Our Approach

Calvary's approach to modern slavery is grounded in our understanding of human dignity, the value of human work, justice, and respect for human rights. The Catholic tradition teaches that every person is created in the image of God and is therefore worthy of dignity and protection. Modern slavery directly contradicts this principle and represents a grave violation of human rights.

Consistent with our values of Hospitality, Healing, Stewardship and Respect, Calvary is committed to upholding human rights not only within our own workforce, but also for workers who may be impacted through our operations and supply chains. We recognise that our responsibility as a care-giving organisation extends beyond direct service delivery to include ethical and responsible procurement practices.

For Calvary staff and volunteers, the celebration of 140 years of care is not only a reflection on our history, but a reaffirmation of the values that shape our work today. Through deliberate and varied engagement, we aim to strengthen a shared sense of belonging, equipping our people with the knowledge, skills and character to live the Calvary story each day.

Wherever possible, we also extend this commitment to those we serve — recognising that it is through everyday interactions with patients, residents and clients that the spirit of the founding Sisters is most powerfully expressed.

This legacy of Being for others has been entrusted to each generation of Calvary staff, volunteers and leaders. As we mark this milestone year, we renew our shared commitment to honouring that legacy and to building a future of hope, ensuring our actions — including how we manage modern slavery risks — reflect the compassion, integrity and respect that have defined Calvary since 1885.

Criteria 2: Operations and Supply Chain

Our Corporate Structure

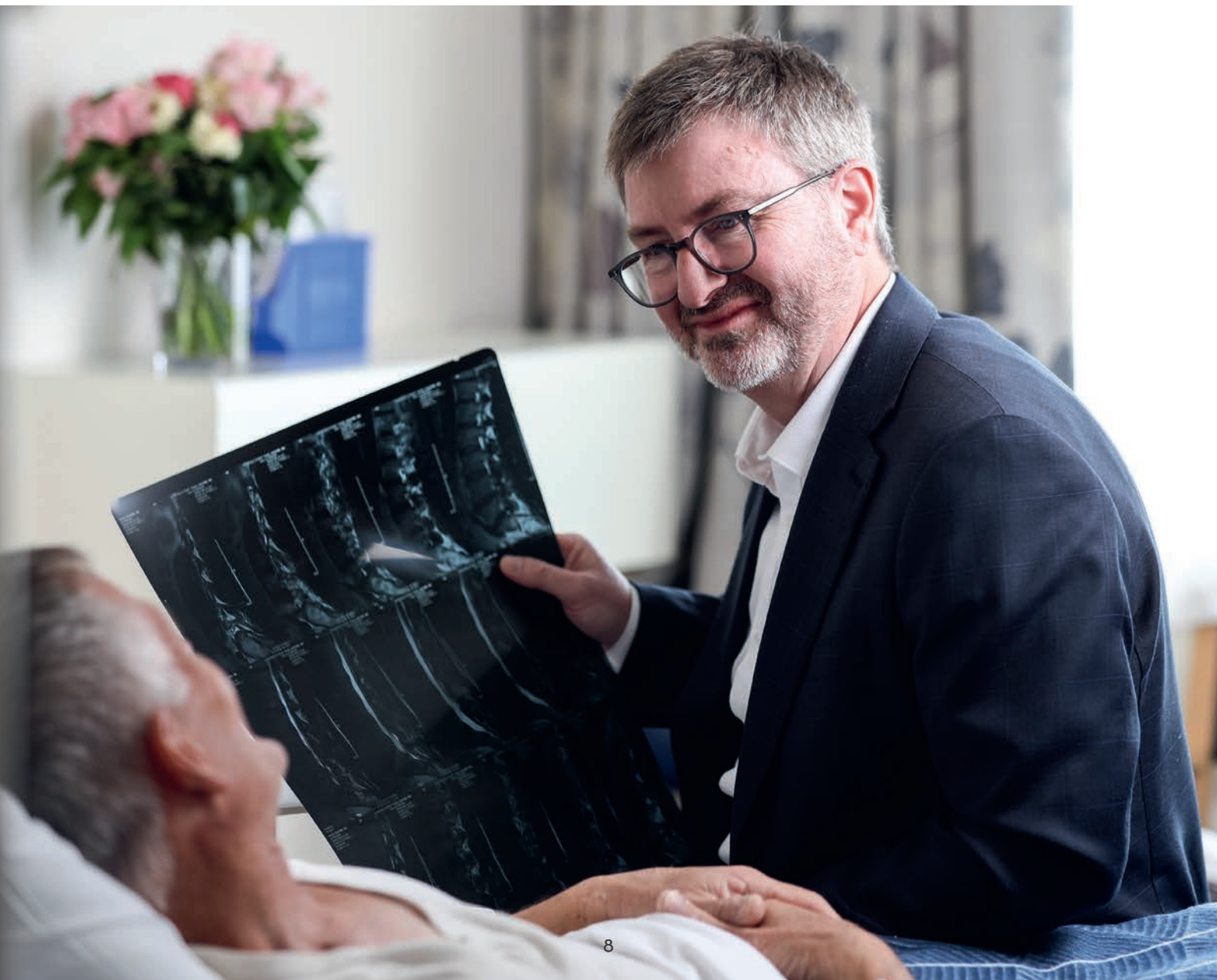
Little Company of Mary Health Care Limited (LCMHC), trading as Calvary Healthcare, is a charitable, not-for-profit public company limited by guarantee, registered under the Corporations Act 2001 (Cth). Calvary operates as a parent entity with a range of wholly owned and controlled subsidiaries delivering health, aged care, retirement living and home care services.

A single Board of Directors governs LCMHC and all owned and controlled entities. This centralised governance model supports consistent oversight, risk management and policy application

across the Calvary group, including in relation to modern slavery and human rights risks. Details of our Board of Directors can be found on our website.

Our Executive Leadership Team (ELT), under Chief Executive Officer, Damien Bruce, oversees Calvary's strategic intent, and delivers on Calvary's mission of Being for others.

A full list of Calvary's owned and controlled entities is provided in Appendix A.



Our Organisational Structure and Governance

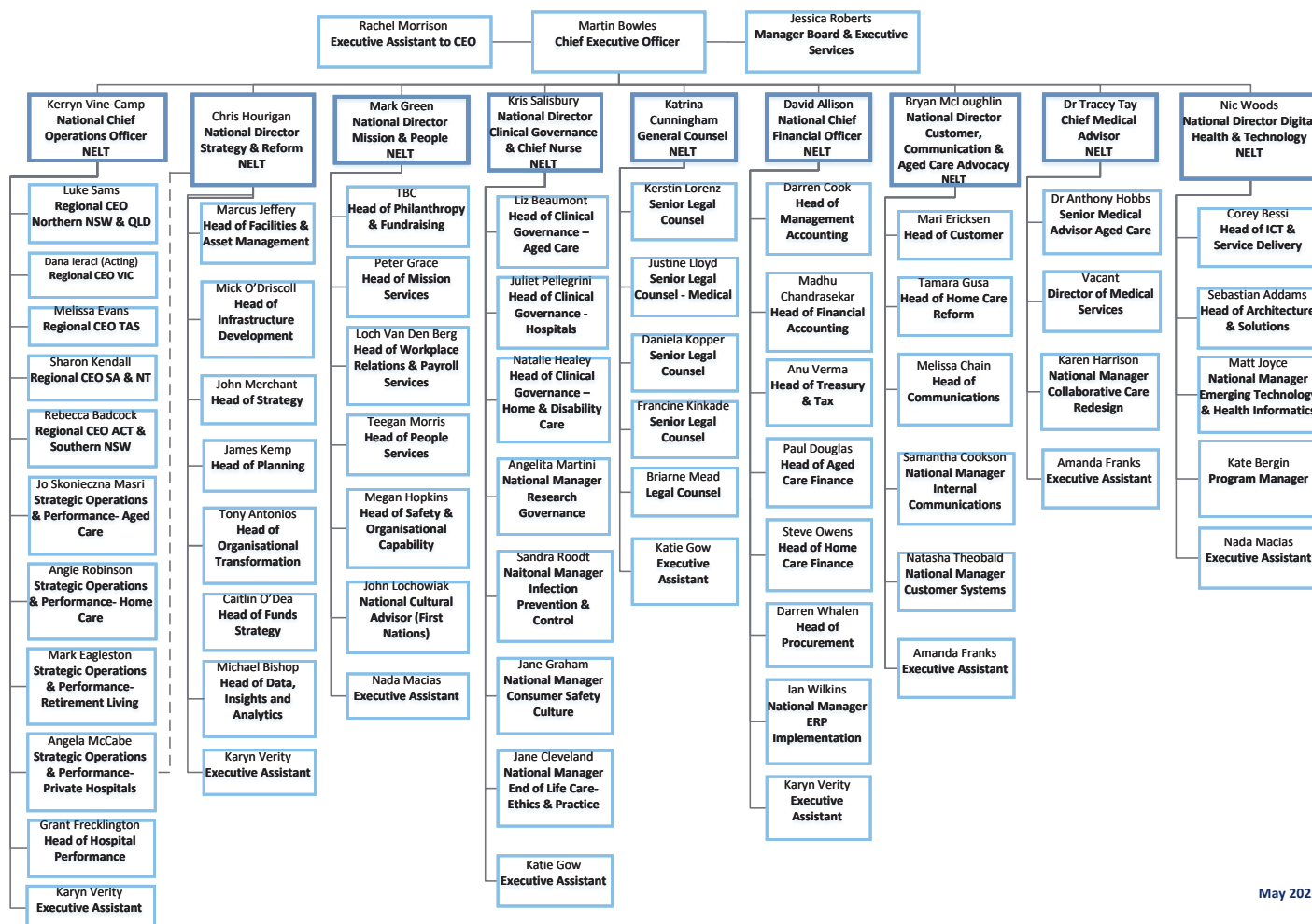
Calvary's governance framework is designed to support strong oversight of ethical, clinical, financial and operational risk, including modern slavery risk.

- The Board of Directors retains ultimate accountability for Calvary's modern slavery response and approves this Modern Slavery Statement.
- The Executive Leadership Team (ELT) oversees implementation of Calvary's strategy, policies and risk management frameworks.
- Board committees, including the Finance, Performance and Risk Committee and the Mission and Ethics Committee, provide specialist oversight and advice relevant to modern slavery risks.

Calvary's governance structures have been reviewed and strengthened over time to reflect the evolving risk profile associated with modern slavery, particularly in procurement, labour hire, and complex supply chains. Modern slavery considerations are embedded into enterprise risk management, procurement governance, and policy frameworks.

Our organisational chart below, illustrates reporting lines and accountability.

ORGANISATIONAL CHART – NATIONAL EXECUTIVE LEADERSHIP TEAM (NELT)



Modern Slavery Working Group and Accountability

Calvary participates in a Modern Slavery Working Group, alongside representatives from across the Catholic network, to support a coordinated and consistent approach to modern slavery risk management. The Working Group brings together expertise from procurement, legal, people and culture, risk, mission and operational services.

The Working Group meets monthly to review modern slavery risk data, supplier engagement outcomes, and remediation activity, and to share insights and emerging issues across the network. Through this forum, Calvary contributes to and benefits from collective learning and sector collaboration.

The Working Group oversees the implementation of Calvary's modern slavery program, coordinates engagement with the Australian Catholic Anti-Slavery Network (ACAN) and supports the consistent application of modern slavery controls across the organisation. Outcomes and key issues are reported through executive management to the Executive Leadership Team (ELT) and, where required, escalated to the Board and relevant Board Committees.

Clear lines of accountability exist from operational teams through executive leadership to the Board, ensuring modern slavery risks are identified, escalated and managed appropriately.

Geographic Areas of Operation

Calvary operates across multiple states and territories in Australia, delivering services through:

- Public and private hospitals
- Residential aged care homes
- Retirement living communities
- Home care and community service centres

Calvary's operations span metropolitan, regional and rural locations, which influences the diversity and complexity of its workforce arrangements and supply chains.

Head Office Location

Calvary's head office is located at:

Level 15, 345 George Street, Sydney NSW 2000, Australia

Financial Overview

For the 2025 reporting period, Calvary's consolidated revenue exceeded \$2 billion, reflecting the scale and complexity of its operations and procurement activities across health and aged care services.

Workforce Profile: Direct Employees

Calvary directly employs a large, predominantly Australian-based workforce across clinical, care, operational, corporate and support functions.

As at the end of the reporting period, Calvary employed 17,803 staff, the majority of whom are engaged directly by Calvary entities. Direct employment significantly reduces the risk of modern slavery within Calvary's own operations, supported by established recruitment, payroll, industrial relations and workplace health and safety controls.

Workforce Profile: Indirect Labour and Contractors

In addition to its directly employed workforce, Calvary engages third-party labour hire providers, contractors and service providers, particularly in areas such as:

- Agency nursing and care staff
- Cleaning and security services
- Facilities management and maintenance
- Catering, laundry and waste services

Calvary recognises that labour hire and subcontracting arrangements can present elevated modern slavery risks, including underpayment, excessive working hours and poor access to grievance mechanisms. These risks are addressed through procurement controls, contractual requirements, supplier screening, and targeted due diligence activities described in this Statement.



Our Operations and Services

Calvary delivers essential services to patients, residents, clients and communities across Australia. To support these services, Calvary procures a wide range of goods and services, including:

- Medical devices, consumables and pharmaceuticals
- Clinical and allied health services
- Labour hire and workforce services
- Food and catering services
- Facilities management, cleaning, security and maintenance
- Linen, laundry and textile products
- Information and communication technology (ICT) hardware and software
- Transport, logistics and waste management services
- Professional, financial and advisory services

These goods and services are sourced from a diverse supplier base, ranging from multinational organisations with complex global supply chains to small and medium Australian businesses.

Our Supply Chain Profile

During the 2025 reporting period:

- Calvary transacted with approximately 5,600 suppliers
- 2,668 suppliers were classified within high-risk procurement categories using the ACAN risk taxonomy
- Significant spend occurred in categories such as medical devices and supplies, labour hire, facilities services and food services

Calvary's supply chains include both domestic and international sourcing, with Tier-1 suppliers reporting manufacturing or service delivery across multiple countries.

The reduction in total supplier numbers compared to the prior reporting period reflects ongoing supplier rationalisation and improved data quality, including consolidation of duplicate vendor records and refinement of procurement reporting.

Escalation and Reporting of Modern Slavery Issues

Calvary has established processes to ensure the timely escalation of modern slavery risks and incidents:

- Staff and suppliers are encouraged to raise concerns through internal reporting channels and whistleblower mechanisms
- Identified risks are assessed by the Modern Slavery Working Group and escalated to executive leadership as required
- Material risks, incidents or remediation matters are reported through established governance channels to the Board and relevant Board Committees
- Where appropriate, Calvary engages Domus 8.7, an independent, victim-centred remediation service, to support affected individuals

These processes ensure that modern slavery risks are addressed promptly, transparently and at the appropriate level of governance.



Criteria 3: Modern Slavery Risks in Operations and Supply Chain

Our Supplier Profile (number of suppliers)

Calvary's 2025 Tier-1 supplier base comprises 5,600 suppliers, reflecting the scale and diversity of our national health, aged care and community care operations.

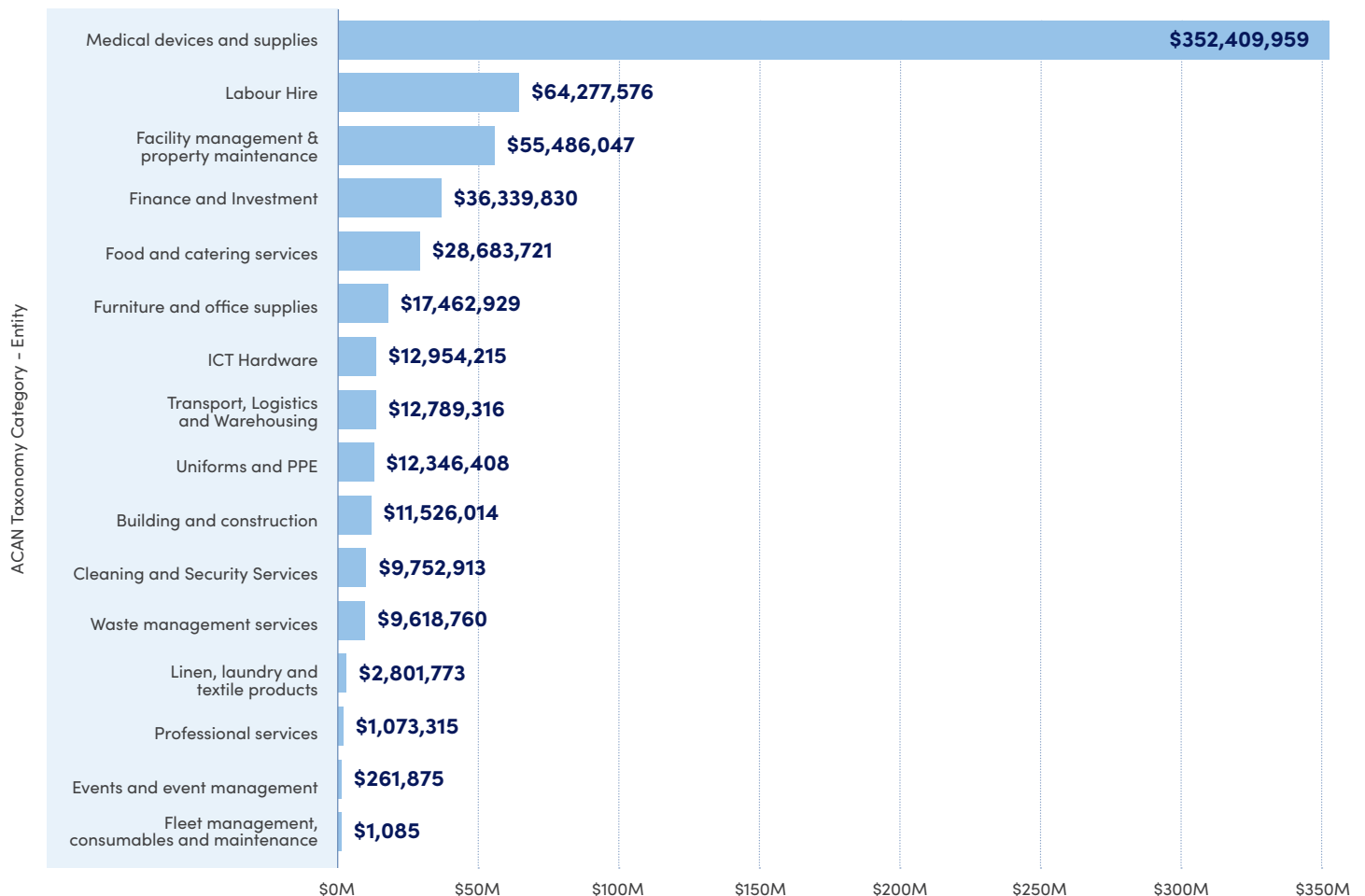
- Suppliers in high-risk procurement categories (by ACAN taxonomy assignment): 2,668.
- ACAN Supplier Surveys: 1,019 cumulative; 620 completed in 2025. These surveys enhance visibility on workforce practices, sourcing and controls.

Major Spend Categories (by value)

Calvary's largest 2025 spend categories include:
(NOTE: ~ = 'approximately')

- Medical devices and supplies – ~\$352.4m
- Labour hire – ~\$64.3m
- Facility management and property maintenance – ~\$55.5m
- Finance and investment – ~\$36.3m
- Food and catering – ~\$28.7m
- Furniture and office supplies – ~\$17.5m
- ICT hardware – ~\$12.9m
- Transport, logistics and warehousing – ~\$12.8m

FIGURE 1: TOTAL SPEND 2025 BY ACAN TAXONOMY CATEGORY - ENTITY



Operational (Internal) Risk: identified and explained

Within operations, Calvary recognises heightened risk scenarios where modern slavery indicators may be more likely to occur or be obscured:

- Third-party labour/agency engagements: potential for recruitment fees, wage underpayment, excessive hours, and inadequate grievance access, particularly in facilities, cleaning, security or surge staffing.
- Complex subcontracting chains: reduced transparency in on-site services (e.g., maintenance, catering, laundry), creating traceability gaps for worker conditions.
- Variable maturity across sites: differences in local contractor oversight, documentation quality, and incident escalation readiness.

These operational risks are addressed through Calvary's procurement controls, updated contract clauses, screening and auditing, and the Domus 8.7 escalation pathway (see Criteria 4 & 5). The 2025 program data (audits, findings and screenings) informs where controls need further strengthening.

Supply Chain Risk: identified and explained

Calvary's supply chains span multiple high-exposure categories and countries. Sector-wide risks include:

- Manufactured goods (medical devices and supplies, PPE, ICT hardware): risks linked to complex multi-tier production, migrant/temporary labour, excessive overtime, and fee-charging recruitment.
- Labour-intensive services (labour hire, cleaning, security, facilities): risks of precarious work, subcontracting, underpayment, poor accommodation, and limited worker voice.
- Food, textiles, logistics and waste: exposure to seasonal/low-wage labour, informal subcontracting, and country-of-origin vulnerabilities.
- Sourcing geographies: Tier-1 declarations include Australia, United States, Germany, China, Italy, United Kingdom and others, with some countries carrying higher inherent risk by global indices; these have been prioritised for SAQs, desktop reviews and audits.

FIGURE 2: SOURCING COUNTRIES FOR TIER 1 SUPPLIERS

Overall inherent risk category ● low ● medium ● high



ACAN Category Risk Taxonomy: assignment to suppliers

Calvary applies ACAN's Category Risk Taxonomy at supplier record level to prioritise due diligence. In 2025, supplier counts withing key risk procurement categories included:

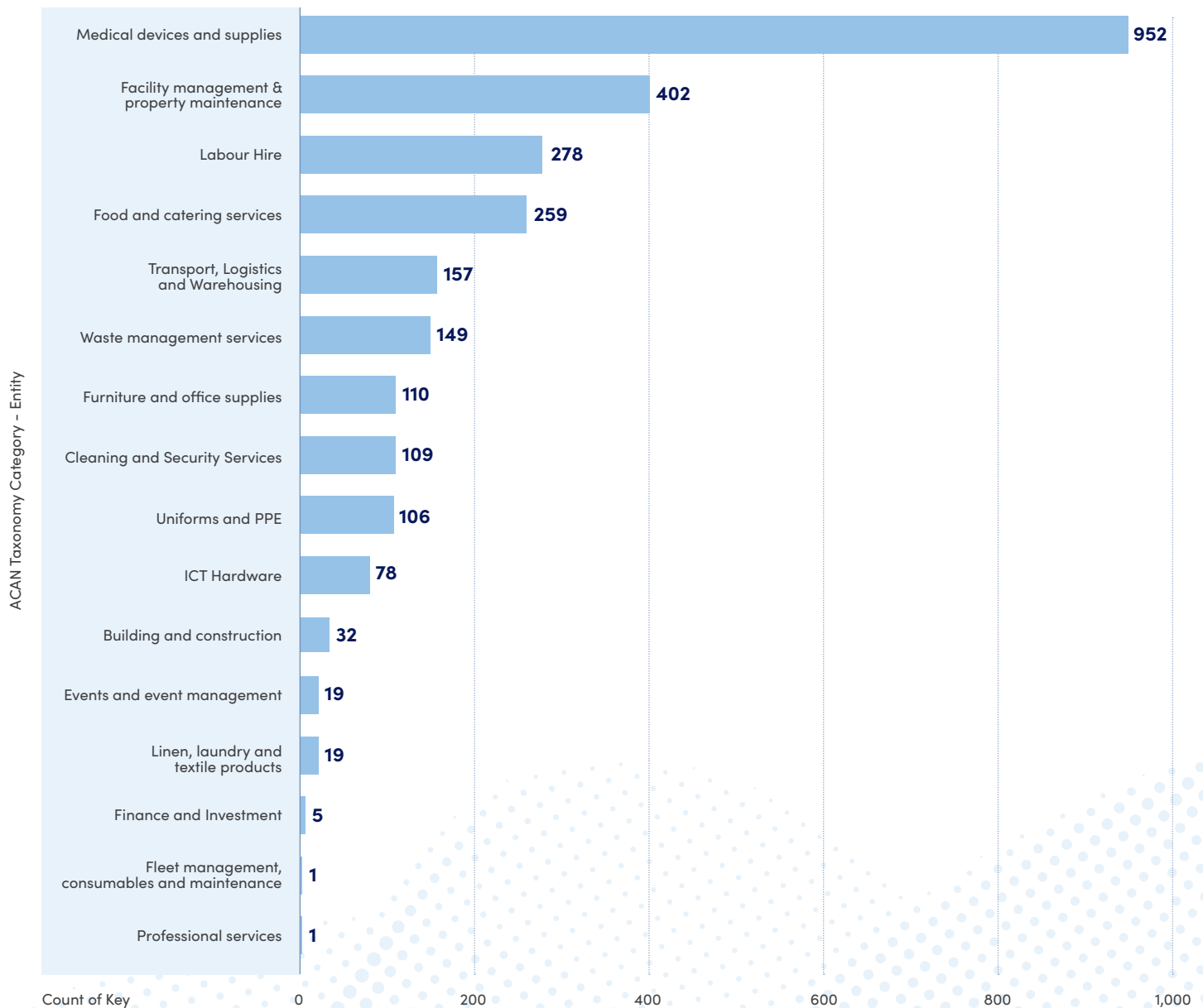
- Medical devices and supplies – 952
- Facility management and property maintenance – 402
- Labour hire – 278
- Food and catering – 259
- Transport, logistics and warehousing – 157
- Waste management – 149

- Furniture and office supplies – 110
- Cleaning and security – 109
- Uniforms and PPE – 106
- ICT hardware – 78

(Additional categories recorded for building and construction; linen/laundry; events; finance and investment; etc.)

This categorisation drives our risk-based engagement, including Supplier Surveys, Sedex SAQs, enhanced screening, audits and corrective action plans.

FIGURE 3: COUNT OF KEY BY ACAN TAXONOMY CATEGORY - ENTITY



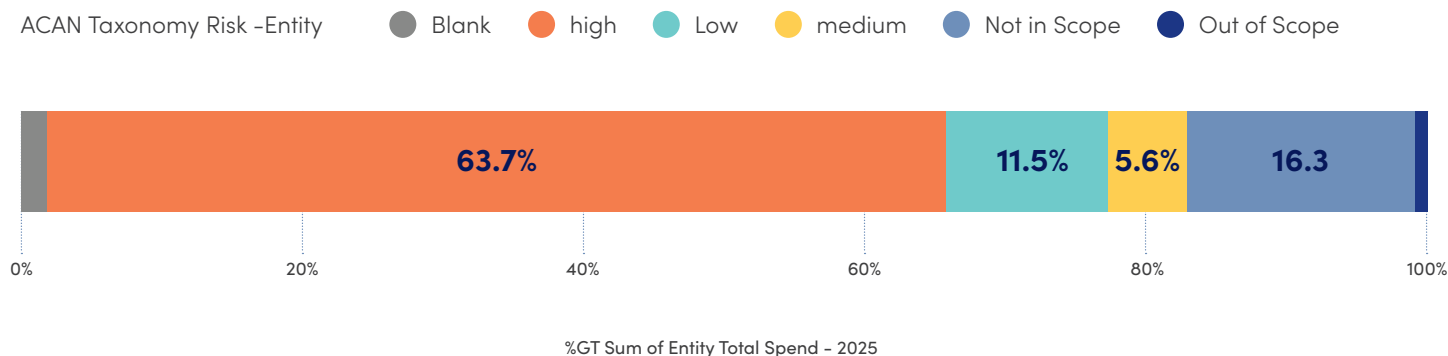
Risk Categories by Spend (metrics)

Using ACAN risk stratification, Calvary's 2025 entity spend profile is:

- High risk: ~63.7%
- Medium risk: ~11.5%
- Low risk: ~5.6%

(Residual "not in scope/out of scope" completes balance.)

FIGURE 4: %GT SUM OF ENTITY TOTAL SPEND - 2025 BY ACAN TAXONOMY RISK - ENTITY



Number of Suppliers and Spend in High-Risk Categories (metrics)

Calvary's 2,668 suppliers are classified within high-risk procurement categories under ACAN taxonomy. This subset is the primary focus for SAQs, screening and audits.

A substantial share of Calvary's 2025 spend is in categories typically associated with elevated risk (e.g., medical devices and supplies, labour hire, facilities services, food and catering, uniforms and PPE, cleaning and security, ICT hardware, transport and logistics). The aggregate high-risk share is ~63.7% of total entity spend.

Our Capacity to Manage Risk: gaps identified (BAU integration)

While Calvary's program has matured, 2025 data indicates areas where further strengthening would be prudent:

- Sub-tier traceability: SAQs and supplier declarations continue to improve visibility, yet deeper tier mapping is needed in complex categories (medical devices, PPE, ICT, textiles).
- Labour-hire oversight: Elevated operational risk persists in service and facilities categories; further contractual controls, supplier screening, and site-level verification will continue.
- Findings closure and remediation metrics: With 48 audits and 438 findings in 2025, we are enhancing closure tracking, time-to-remedy, and worker-centred outcomes documentation.
- Coverage and cadence: 158 Sedex SAQs and 529 enhanced screenings provide strong momentum; we aim to increase refresh frequency in high-risk cohorts and expand coverage in emerging risk categories.
- Worker voice access: Continued promotion of grievance channels and Domus 8.7 referral pathway at site level will improve accessibility and trust for contractor/ subcontractor workers.

These targeted improvements are embedded into our multi-year plan and monitored through procurement governance and Board reporting (see Criterion 5 for effectiveness measures).

Criteria 4: Steps taken to address Modern Slavery Risk

Overview of Our Approach

Calvary's approach to addressing modern slavery risk is grounded in our commitment to human dignity and ethical practice. During the 2025 reporting period, Calvary continued to strengthen its modern slavery risk management framework through a combination of governance, procurement controls, supplier engagement, training, monitoring and remediation.

Our actions are designed to:

- Prevent modern slavery risks from arising where possible
- Identify and assess risks within our operations and supply chains
- Engage with suppliers to improve practices and outcomes
- Enable timely escalation and remediation where concerns are identified

These steps are embedded within business-as-usual processes and are supported by data-driven tools and sector collaboration through the Australian Catholic Anti-Slavery Network (ACAN).

Embedding Controls in Procurement and Purchasing Practices

Modern slavery risk controls are embedded throughout Calvary's procurement lifecycle, including:

- Tender processes, where suppliers are required to respond to modern slavery-related questions and demonstrate alignment with Calvary's expectations
- New supplier onboarding, which incorporates ACAN Supplier Surveys and, where appropriate, Sedex Self-Assessment Questionnaires (SAQs)
- Contract renewals and extensions, where supplier risk profiles are reviewed and engagement requirements refreshed
- Business award and supplier selection decisions, which consider modern slavery risk alongside quality, safety and value for money

Procurement team use ACAN risk taxonomy data to prioritise high-risk categories for enhanced due diligence and ongoing monitoring. Modern slavery risk is also considered as part of supplier selection and contract award decisions, alongside clinical, operational and commercial factors.

Calvary recognises that its modern slavery program continues to evolve. While significant progress has been made in supplier engagement, data visibility and governance, further work is required to strengthen sub-tier transparency, labour hire oversight and remediation tracking. These areas remain a focus for ongoing improvement.

Contractual Controls and Clauses

Calvary includes modern slavery and human rights clauses in supplier contracts. These clauses require compliance with applicable legislation, prohibit forced labour and exploitative practices, and support Calvary's right to engage suppliers on corrective action or remediation where concerns are identified. Modern slavery clauses are included in all new contracts and are reviewed and updated during contract renewals and extensions.

Communicating Supplier Expectations

Calvary has a documented and consistent process for communicating modern slavery expectations to suppliers, including through:

- Calvary's Business Partners' Criteria
- Ethical sourcing and procurement policies
- Tender documentation and supplier guidance materials
- Supplier onboarding processes

Implementation of supplier expectations is monitored through ACAN Supplier Surveys, Sedex SAQs, enhanced supplier screening, desktop reviews and audits, with follow-up actions tracked where gaps are identified.

Supplier Due Diligence and Risk Assessment through Sedex

As part of Calvary's modern slavery risk management framework, Calvary completed its own Sedex Self-Assessment Questionnaire (SAQ) during the reporting period. The Sedex SAQ provides a structured externally recognised assessment of management systems, policies and controls across key risk areas relevant to modern slavery, including labour standards, health and safety, business ethics and human rights.

Completion of the SAQ enables Calvary to assess the maturity and effectiveness of its internal systems, benchmark performance, and identify opportunities for continuous improvement in managing labour and human rights risks across its operations and supply chains.

Calvary achieved an overall Sedex management controls score of 4.1 out of 5 (Advanced), indicating a high level of maturity in the systems and processes used to manage modern slavery and related risks.

Key thematic results included:

- Labour standards: 4.0 out of 5 (Advanced)
- Health and safety: 4.2 out of 5 (Advanced)
- Business ethics: 4.5 out of 5 (Advanced)

MANAGEMENT CONTROLS

Measures suppliers' risk management (0-5, with 5 as best) to assess effectiveness and target improvements.

Labour standards	4/5	Health & safety	4.2/5	Business ethics	4.5/5	Environment	—/5*
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SECTION TITLE	POINTS AVAILABLE	POINTS ACHIEVED	% OF POINTS ACHIEVED	SCORE
Profile	1	1	100%	5.0 (Advanced)
Management systems	31	29	93.5%	4.7 (Advanced)
Freely chosen employment	25	13	52%	2.6 (Moderate)
Freedom of association	7	7	100%	5.0 (Advanced)
Health and safety	55	47	85.5%	4.3 (Advanced)
Living accommodation	8	6	75%	3.8 (Good)
Working hours	6	6	100%	5.0 (Advanced)
Discrimination	41	41	100%	5.0 (Advanced)
Discipline and grievance	34	23	67.6%	3.4 (Good)
Communities and human rights	16	9	56.3%	2.8 (Moderate)
Business ethics	10	9	90%	4.5 (Advanced)

*Not included as this category is not included in the scope of this Sedex SAQ.

These results provide an objective source of assurance that core policies, governance arrangements and operational controls are in place and are functioning as intended. The findings also inform ongoing monitoring and continuous improvement activities, as reported under Criterion 5.

The SAQ identified strong performance across several areas, including management systems (93.5% of available points achieved), freedom of association (100%), working hours (100%), non-discrimination (100%), health and safety (85.5%) and business ethics (90%). These outcomes provide assurance that foundational controls to prevent and address modern slavery risk are operating effectively.

The assessment also highlighted areas requiring ongoing focus and continuous improvement, including freely chosen employment, discipline and grievance mechanisms, communities and human rights, and living accommodation. These findings have informed Calvary's ongoing program development, including strengthening worker communication, enhancing grievance and escalation pathways, and refining procurement and supplier engagement processes.

Insights from the Sedex SAQ are used alongside ACAN risk taxonomy data, supplier surveys, enhanced screening and audits to inform Calvary's risk-based approach to monitoring and improving modern slavery risk management.

Policies Supporting Modern Slavery Risk Management

Modern slavery risk management is incorporated into Calvary's policy framework, including

- Ethical Sourcing Policy
- Business Partners' Criteria
- Code of Business Practice
- Whistleblower and grievance-related policies

These policies are implemented across all Calvary entities and are subject to periodic review and update to ensure continued relevance and effectiveness.

Training and Awareness: Internal

Building internal capability is a key component of Calvary's program.

During the 2025 reporting period:

- 357 staff completed ACAN modern slavery e-learning modules
- Training focused on recognising modern slavery indicators, understanding risk in procurement and labour hire, and knowing how to escalate concerns

In addition to e-learning:

- Modern slavery topics were addressed through working group meetings, procurement forums and governance discussions
- These engagements supported shared understanding and practical application of Calvary's modern slavery framework across the organisation

Worker Voice, Grievance Mechanisms and Remediation

Calvary has processes in place to enable workers to raise concerns about unethical or unsafe practices, including modern slavery indicators.

- Staff and suppliers can raise concerns through internal reporting and whistleblower mechanisms
- Identified risks are assessed and escalated through management and governance channels
- Where appropriate, Calvary engages Domus 8.7, an independent, victim-centred remediation service that provides confidential advice and support to individuals who may be affected by modern slavery

This integration strengthens Calvary's ability to respond appropriately, consistently and in alignment with international human rights principles.

Roles, Responsibilities and Accountability

Modern slavery responsibilities are incorporated into:

- Procurement and supply chain roles
- Risk, legal and people and culture functions
- Leadership and governance roles involved in supplier oversight and escalation

Clear expectations are established through position descriptions, governance charters and working group terms of reference, ensuring accountability is embedded across the organisation.

Monitoring and Review of Risk Controls

Calvary has initiated and continued to develop a modern slavery risk control monitoring process, including:

- Ongoing analysis of ACAN risk taxonomy data
- Tracking of supplier engagement outcomes (surveys, SAQs, audits and screening)
- Review of audit findings and corrective action plans
- Twice-yearly reporting to the People, Values and Culture Committee (PVCC) and the Mission and Ethics Committee of the Board, with escalation to the full Board where material issues are identified

These mechanisms enable Calvary to assess whether controls are operating as intended and to identify areas for improvement.



Case Studies: Addressing Risk in Practice

Case Study 1: Supplier Due Diligence and Corrective Action in a High-Risk Services Category

Risk identified

Through analysis of ACAN risk taxonomy data and supplier engagement information, Calvary identified a Tier-1 supplier operating within a high-risk services category as presenting potential modern slavery risk indicators. Initial supplier data suggested gaps in transparency regarding the use of labour hire and subcontracting arrangements, as well as limited information on worker grievance mechanisms.

These factors were assessed as increasing the risk of poor labour practices, including inadequate worker voice and insufficient oversight of employment conditions.

Actions taken

- Requesting the supplier complete a Sedex Self-Assessment Questionnaire (SAQ) to provide greater visibility over labour standards, workforce composition, recruitment practices and grievance processes
- Conducting a desktop review of the supplier's policies, procedures and disclosures to identify gaps and inconsistencies
- Engaging directly with the supplier to clarify labour hire and subcontracting arrangements, including how workers are recruited, paid and supported
- Working with the supplier to develop a corrective action plan, focusing on:
 - Improving transparency of labour hire arrangements
 - Strengthening worker communication and induction processes
 - Establishing or enhancing accessible grievance mechanisms
 - Clarifying roles and responsibilities for labour standards oversight

Outcome and ongoing monitoring

As a result of this engagement:

- The supplier improved documentation relating to labour practices and worker protections
- Policies and procedures were updated to better align with Calvary's expectations and modern slavery requirements
- Clear actions and time frames were agreed for implementation and follow-up

The supplier remains subject to ongoing monitoring through the ACAN program, with a further review planned to assess progress against agreed actions. This approach enabled Calvary to address identified risks collaboratively, while supporting improved practices and outcomes for workers.



Criteria 5: Effectiveness of Steps taken under Criterion 4

Calvary recognises that assessing effectiveness is critical to ensuring that modern slavery risk management activities are not only performed, but are delivering meaningful outcomes. Effectiveness is assessed through a combination of quantitative and qualitative indicators, including increased supplier coverage, audit outcomes and corrective action closure, enhanced screening activity, and improved internal capability through training and governance engagement.

- **Sedex participation:** 154 suppliers identified for onboarding; 115 suppliers joined Sedex during the reporting period, with cumulative participation continuing to increase suppliers; 132 SAQs completed (cumulative), enabling structured, comparable risk assessment at site level.
- **Verification and monitoring:** 48 social audits with 438 findings in 2025; 529 enhanced third-party screenings prioritising high/medium-risk suppliers.
- **Procurement embedding (evidence):** modern slavery controls are applied through tenders, supplier onboarding, contract drafting/renewal, risk-based SAQs, enhanced screening, and targeted audits—as described in Criterion 4—and monitored via procurement governance and ACAN dashboards.

How we measure effectiveness and evidence BAU embedding

Calvary measures the effectiveness of its modern slavery risk management program using quantitative and qualitative data drawn from the ACAN Baseline and End-of-Year data packs, ACAN Entity Report dashboards, Sedex Self-Assessment Questionnaire (SAQ) results, and internal procurement and governance records. Together, these measures demonstrate that modern slavery risk management is embedded within business-as-usual procurement, workforce and supplier management processes. Key 2025 indicators include:

- **Staff capability:** 357 e-learning completions (cumulative) on modern slavery awareness, risk identification and escalation pathways.
- **Supplier engagement:** 1,019 ACAN Supplier Surveys (cumulative), including 620 completed during 2025, increasing coverage and the granularity of supplier-provided labour and sourcing data.

Use of ACAN Data and Sedex SAQ to Measure Effectiveness

Calvary uses the ACAN End-of-Year data pack alongside completion of its own Sedex Self-Assessment Questionnaire to assess the effectiveness and maturity of its modern slavery risk management framework.

The ACAN data provides insight into supplier risk exposure by category and spend, while the Sedex SAQ assesses the strength of Calvary's internal management systems and controls across labour standards, health and safety, business ethics and human rights. Completion of the Sedex SAQ confirmed that Calvary's internal controls are operating at an advanced level, providing assurance that governance, policies and processes supporting supplier due diligence and labour-risk management are effective.

Insights from both ACAN and Sedex data sources are used to refine procurement controls, prioritise supplier engagement, inform governance reporting and guide continuous improvement.

Demonstrated improvement over previous years

Our 2025 data indicates continued maturation of Calvary's modern slavery risk management program compared to 2024. Improvements are reflected not only in increased activity levels, but also in a more targeted, risk-based approach and improved data quality.

Key indicators include:

- **Supplier surveys:** 523 → 1,019 (cumulative), substantially improving supplier coverage and depth of labour-practice visibility
- **Sedex SAQs:** 88 → 132, expanding the use of structured, comparable site-level risk data to labour-practice visibility.
- **Social audits:** 18 → 48, materially increasing verification depth and corrective action planning.
- **Internal capability:** e-learning completions from 250 → 357 (cumulative), strengthening internal awareness, escalation capability and governance engagement.

Some year-on-year movements reflect program refinement rather than deterioration.

For example

- The reduction in the total number of suppliers and high-risk suppliers reflects ongoing supplier rationalisation, consolidation of duplicate vendor records and improved classification accuracy, rather than reduced engagement.
- While the number of suppliers joining Sedex in 2025 is lower than in 2024, this reflects a shift from initial onboarding to a more widespread adoption, including increased SAQ completion, audit activity and follow-up of findings with existing Sedex-linked suppliers.
- The decrease in suppliers attending training reflects a change in engagement approach, with greater emphasis placed on targeted due diligence, audits and corrective actions for higher-risk suppliers rather than broad training participation metrics.

Taken together, these trends indicate a shift from program establishment to a more mature, risk-prioritised and outcomes-focused approach, with greater emphasis on verification, remediation and governance oversight.

To present the year-on-year position transparently, Figure 5.1 summarises key indicators.

FIGURE 5.1: INTERNAL AND EXTERNAL MODERN SLAVERY PROGRAM METRICS (2024–2025)

FOCUS	DESCRIPTION	2024	2025
Internal	Hours spent on Modern Slavery Activities	300 hours	300 hours
	eLearnings completed	250	357
External	Total number of suppliers	6,051	5,603
	Total number of high-risk suppliers	3,771	2,668
	Number of ACAN Supplier Surveys completed	523	1,019
	Invited to join Sedex	127	154
	Joined Sedex	185	115
	Suppliers completing Sedex risk assessment SAQ	88	132
	Suppliers attending training	72	27
	Social audits (Supplier site audit)	18	48

Figure 5.3 – Social Audits and Findings (2025), evidencing risk identification and corrective action.

Figure 5.3 presents ACAN network's social audit activity and associated findings for the 2025 reporting period. The figure shows the number of audits conducted, the total volume of findings identified, and the distribution of findings by severity and status (e.g. created, ongoing, verified, or verified through follow-up audit).

The data demonstrates that audits are not an end in themselves, but a mechanism for identifying specific labour-related risks and progressing corrective action.

The breakdown of finding status shows that a significant proportion of findings have been verified as closed or verified through subsequent audit, while others remain ongoing or pending follow-up, indicating active monitoring rather than unresolved issues being ignored.

The concentration of findings in areas such as wages, working hours, health and safety, and regular employment highlights where risks are most prevalent and where corrective action has been prioritised. This audit-to-closure lifecycle evidences Calvary's approach to identifying risk, requiring corrective action plans, and tracking their implementation over time, supporting the effectiveness assessment under Criterion 5.

FIGURE 5.3A: COUNT OF AUDIT CODE BY YEAR

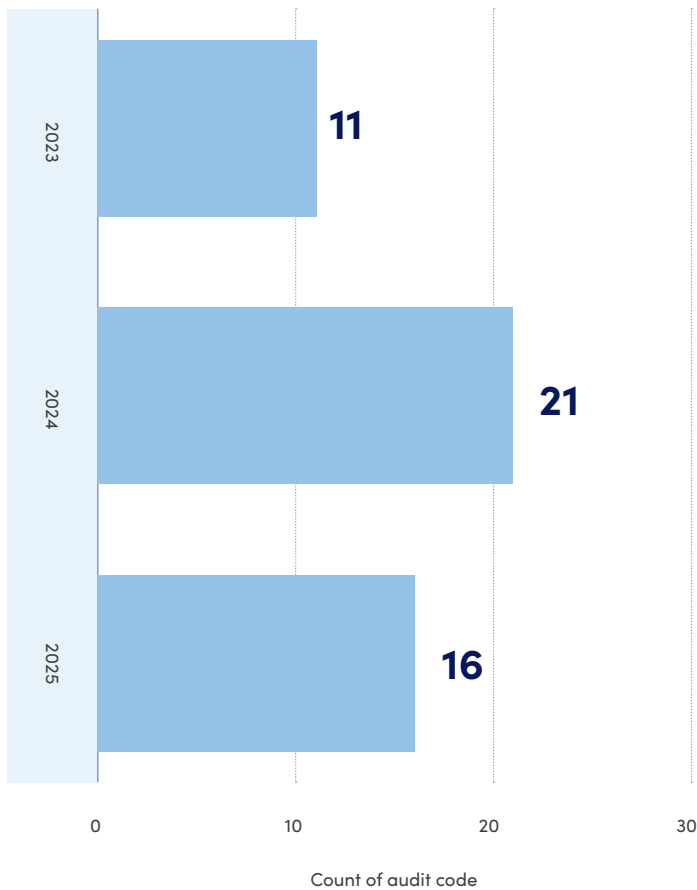


FIGURE 5.3B: SOCIAL AUDIT FINDINGS BY CRITICALITY AND STATUS (2025)

FINDING CRITICALITY	COUNT OF AUDIT FINDING CODE	FINDING STATUS
Business critical	1	Verified
Business critical	1	Verified by new audit
Collaborative action required	6	Created
Collaborative action required	2	Ongoing
Critical	3	Created
Critical	2	Pending auditor review
Critical	3	Pending follow up
Critical	31	Verified
Critical	21	Verified by new audit
Major	34	Created
Major	1	Dispute rejected by auditor
Major	8	Pending auditor review
Major	10	Pending follow up
Major	2	Rejected
Major	152	Verified
Major	81	Verified by new audit
Minor	6	Created
Minor	2	Pending auditor review
Minor	2	Pending follow up
Minor	1	Rejected
Total	438	

FIGURE 5.3C: COUNT OF AUDIT FINDING CODE BY FINDING CATEGORY AND FINDING CRITICALITY

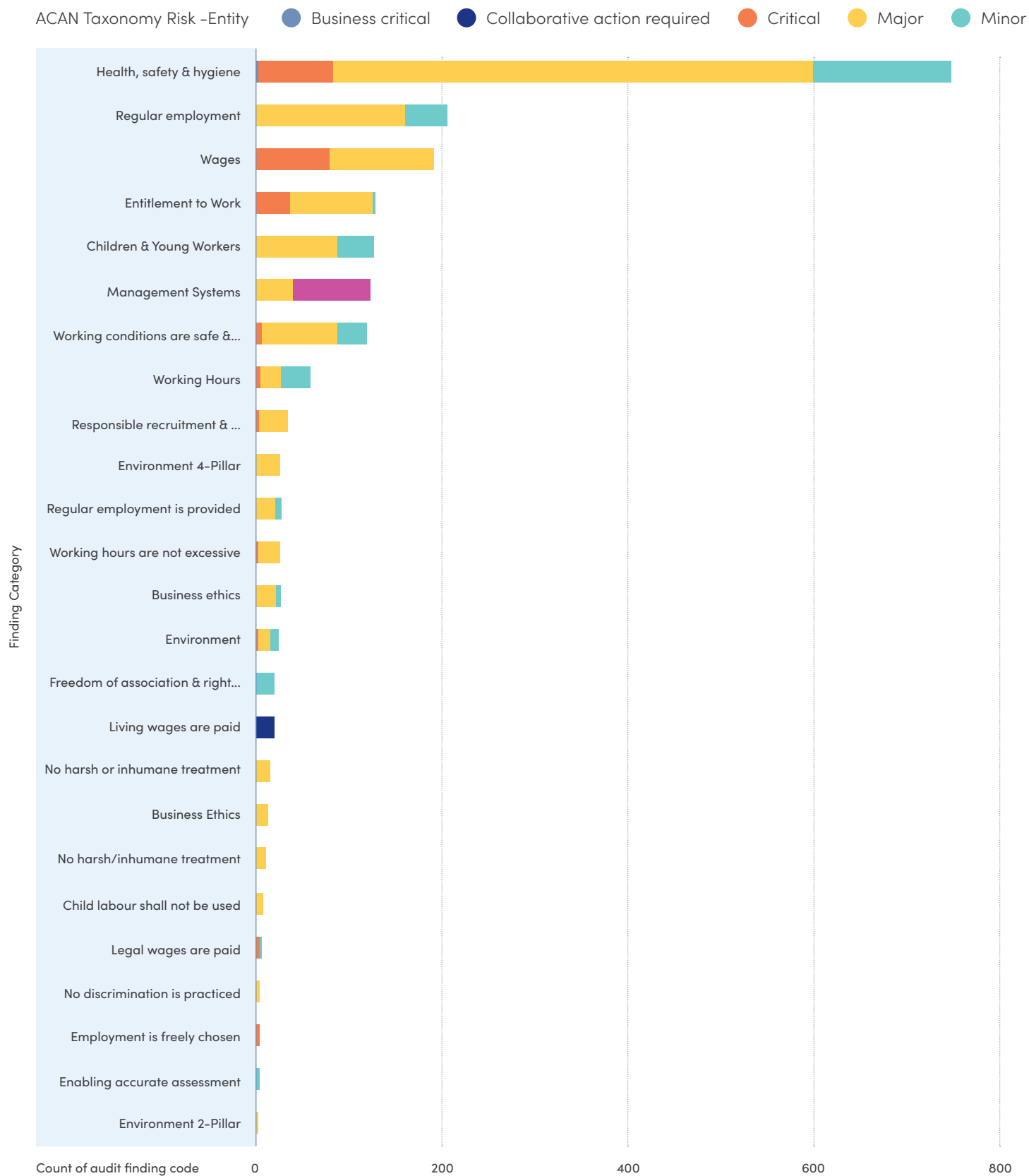
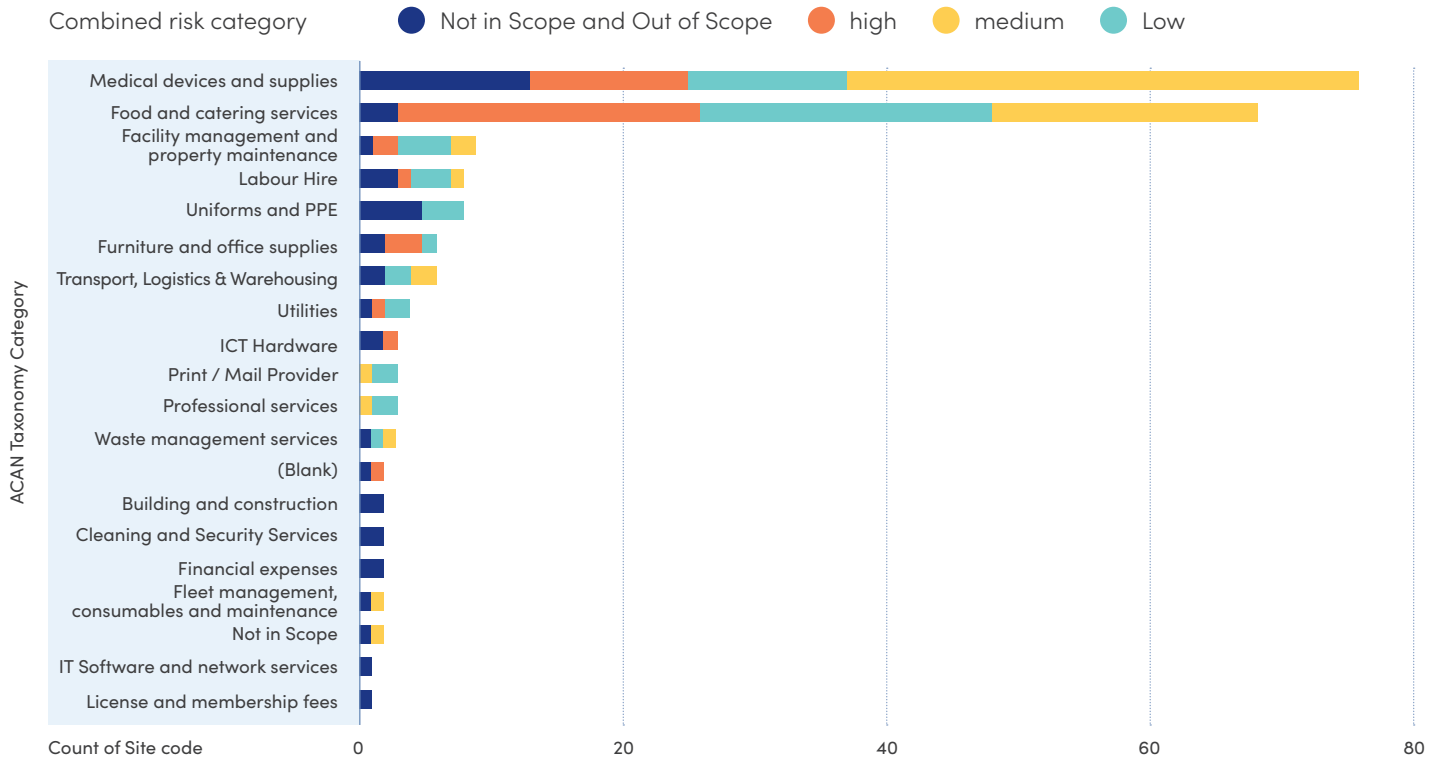


Figure 5.4 – Sedex SAQ risk Category, evidencing data-driven prioritisation of high-risk cohorts

Figure 5.4 presents an overview of suppliers that have completed Sedex SAQs, mapped against the ACAN risk taxonomy and disaggregated by combined risk category (high, medium and low). The figure shows how Sedex engagement is distributed across procurement categories with differing inherent modern slavery risk profiles.

The concentration of completed SAQs in higher-risk categories such as medical devices and supplies, food and catering services, labour hire, and facilities services reflects a targeted approach to supplier due diligence. This visibility enables Calvary to prioritise follow-up actions—such as further desk-based reviews, audits or corrective action engagement—where the risk of labour exploitation is assessed to be higher, supporting the effectiveness assessment under Criterion 5.

FIGURE 5.4: SEDEX SAQ - RISK CATEGORY BY ACAN TAXONOMY



Continuous improvement in risk identification

Effectiveness is visible in the quality and breadth of risk signals Calvary now receives and acts upon:

- Increased survey/SAQ throughout provides more granular insights into workforce composition, recruitment practices and country exposure.
- Expanded audits and enhanced screening surface actionable indicators (e.g., overtime, wage compliance, grievance access), guiding corrective actions and contract management.
- ACAN dashboards refine category targeting (e.g., medical devices and supplies, labour, facilities, food, uniforms/PPE, ICT), making interventions more proportionate and timely.

Effectiveness of grievance channels and remediation

Calvary maintains internal grievance and whistleblower channels and has access to Domus 8.7, an independent, victim-centred remediation service.

Effectiveness indicators include:

- Contractual inclusion of grievance access and no worker-paid fee requirements
- Increased internal training improving recognition and escalation
- Audit-driven actions strengthening on-site worker communications about grievance options
- Domus 8.7 data fields for 2025 were pending in the ACAN baseline at time of reporting; validated figures will be included as they become available.

Evidence of indicators identified and resolution

In 2025, 48 audits generated 438 findings across categories including health and safety and hygiene, wages, working hours, regular employment, and entitlement to work. Findings were graded (critical/major/minor) with corrective action plans established and tracked to closure or re-verification. These are indicators of labour risk (not necessarily modern slavery). Calvary's focus remains to address root causes to reduce the likelihood of harm. Any credible concerns are escalated where appropriate.

Reporting Criteria 6: Internal Consultation

Consultation with Owned or Controlled Entities and Internal Stakeholders

Calvary recognises that effective management of modern slavery risks requires meaningful and ongoing consultation across the organisation. During the 2025 reporting period, consultation was undertaken with subsidiaries, owned and controlled entities, divisions and relevant internal departments to inform the development and implementation of Calvary's modern slavery risk management approach and this Modern Slavery Statement.

Consultation occurred through Calvary's established governance and operational structures, including engagement with representatives from:

- Hospitals, residential aged care, retirement living and home care services
- Procurement and supply chain teams
- People and Culture
- Legal, risk and compliance functions
- Mission and ethics leadership
- Finance and operational support services

These consultations supported a shared understanding of modern slavery risks across Calvary's diverse operating environments and ensured that policies, procedures and controls are practical, consistent and capable of being implemented across all entities.

In addition, Calvary's engagement with the Australian Catholic Anti-Slavery Network (ACAN) supports consultation and information-sharing at a sector level. Two members of Calvary's procurement team participate in ACAN working groups and sector forums, with insights, guidance and emerging issues fed back into Calvary through internal consultation and procurement governance processes.

As Calvary operates under a single Board of Directors and unified executive leadership structure, modern slavery policies, training programs and supplier engagement frameworks are developed centrally and applied consistently across all owned and controlled entities. Feedback from internal stakeholders and ACAN-related activities is used to refine risk identification processes, supplier engagement strategies and escalation pathways.

Outcomes of consultation and key insights arising from procurement activities, supplier engagement, training, audits and risk management processes are escalated through executive leadership and reported via established governance and Board committee structures, ensuring appropriate oversight and accountability. Through this approach, Calvary seeks to ensure that modern slavery risk management is embedded across the organisation, reflects the realities of service delivery, and supports continuous improvement in protecting human dignity within its operations and supply chains.

Criteria 7: Any other relevant information

Additional Context and Ongoing Commitment

Calvary recognises that addressing modern slavery is a long-term commitment that requires continuous improvement, collaboration and transparency. Beyond the actions outlined in this Statement, Calvary continues to strengthen its approach through sector engagement, capability building and forward-looking initiatives designed to embed respect for human rights across its operations and supply chains.

Calvary has been an active member of the Australian Catholic Anti-Slavery Network (ACAN) since 2019 and continues this engagement in 2025. Through ACAN, Calvary participates in coordinated, pre-competitive collaboration with other Catholic health, aged care and community service providers. This collaboration enables shared risk identification, harmonised supplier engagement, and more efficient use of resources to address modern slavery risks that are common across the sector.

Calvary's access to Domus 8.7, strengthens its capacity to respond appropriately where modern slavery risks or indicators are identified and supports alignment with international human rights principles, including the UN Guiding Principles on Business and Human Rights.

Looking ahead, Calvary is committed to further embedding modern slavery risk management into business-as-usual practices. Planned and ongoing initiatives include:

- Continued enhancement of data quality and automation to improve visibility of supply chain risks
- Expansion of supplier engagement and due diligence activities in high-risk categories
- Ongoing review of grievance and escalation mechanisms to ensure they are accessible, effective and trusted
- Continued training and awareness-raising for staff and targeted supplier groups
- Regular review of the effectiveness of controls, informed by ACAN baseline data and year-on-year analysis.

As Calvary marks 140 years of care in Australia, the organisation remains committed to ensuring that its legacy of compassion, dignity and justice is reflected not only in the care it provides, but also in the way it conducts its business and engages with those who contribute to its mission. Calvary will continue to report transparently on its progress and challenges as it works to prevent, identify and address modern slavery risks.

Appendices

Appendix 1: Calvary Company Entity List as at 31 December 2025

COMPANY	ACN	ABN
Calvary Home Care Services Limited	118 225 559	44 118 225 559
Calvary Bruce Private Hospital Limited	129 801 378	67 129 801 378
Calvary Health Care Tasmania Limited	129 926 790	29 129 926 790
Calvary Health Care ACT Limited	105 304 989	74 105 304 989
Calvary Health Care Bethlehem Limited	105 303 704	81 105 303 704
LCM Calvary Health Care Holdings Limited	105 355 306	22 105 355 306
Calvary Health Care Sydney Limited	105 757 453	95 105 757 453
Calvary Health Care Riverina Limited	105 810 688	45 105 810 688
Calvary Retirement Community Ryde Limited (not active)	105 898 173	40 105 898 173
Little Company of Mary Health Care Limited	079 815 697	11 079 815 697
Calvary Private Health Care Canberra Limited	121 852 088	83 121 852 088
Calvary Health Care Adelaide Limited	106 314 229	85 106 314 229
Calvary Retirement Community Canberra Limited (not active)	106 452 402	17 106 452 402
Calvary Health Care (Newcastle) Limited	081 149 126	75 081 149 126
Calvary Mary MacKillop Care SA Limited (not active)	052 973 387	83 052 973 387
Japara Healthcare Limited	168 631 052	54 168 631 052
Calvary Holdings Pty Ltd	110 466 889	18 110 466 889
Japara Property Holdings Pty Ltd	166 991 984	18 166 991 984
Japara Property Management Pty Ltd	113 425 086	53 113 425 086
Japara Developments Pty Ltd	110 645 773	92 110 645 773
Calvary Aged Care Limited	168 631 052	54 168 631 052
Calvary Retirement Living Pty Ltd	123 407 509	48 123 407 509
Calvary Administration Pty Ltd	110 281 760	32 110 281 760
Japara Home Care Pty Ltd	610 327 261	52 610 327 261
JD No. 3 (Lakes Entrance) Pty Ltd	122 943 408	52 122 943 408
JD No. 5 (Albury & District) Pty Ltd	120 220 313	16 120 220 313
Calvary Retirement Living 2 (Balmoral Mews) Pty Ltd	123 447 245	57 123 447 245
Calvary Retirement Living 4 (Cosgrove Cottages) Pty Ltd	123 447 263	61 123 447 263
Calvary Retirement Living 5 (Sydney Williams) Pty Ltd	123 790 358	66 123 790 358
Calvary Retirement Living 6 (Barongarook) Pty Ltd	127 055 565	90 127 055 565
Calvary Retirement Living 7 (The Homestead) Pty Ltd	131 357 983	18 131 357 983

MODERN SLAVERY STATEMENT 2025

Reporting Period 1 January 2025 – 31 December 2025



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This Statement has been produced on behalf of:

Catholic Healthcare Limited

ABN 69 064 946 318

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Macquarie Park, NSW 2113

E: procurement@chcs.com.au

W: catholichealthcare.com.au

LEADERSHIP MESSAGE, APPROVAL AND SIGNATURE

Brief Statement from the Board Chair & Chief Executive Officer

Catholic Healthcare is committed to respecting and protecting the dignity of everyone connected with our organisation, whether they work with us directly or indirectly. We also support initiatives that promote a more compassionate and just society, including Australia's Modern Slavery legislation.

Our organisation takes a strong stance against modern slavery and is committed to taking all reasonable steps to ensure our operations and activities do not contribute to any form of modern slavery.

Catholic Healthcare provides care and support for older people through our residential care homes, retirement communities and home care services.

We work with a wide range of suppliers who provide goods and services essential to our operations. We aim to increase awareness of modern slavery risks and seek to partner with reputable suppliers who share our commitment to ethical practices. Catholic Healthcare also prioritises educating our employees about modern slavery and continuously strengthening our procurement processes, with a focus on the responsible and ethical sourcing of goods and services.

We are proud to present Catholic Healthcare's sixth Modern Slavery Statement and acknowledge the strong commitment of our people and leaders in supporting the ongoing effort to eliminate modern slavery.



A handwritten signature in black ink that reads "Stephen Teulan".

**Stephen Teulan,
Board Chair**



A handwritten signature in black ink that reads "J. McFarlane".

**Josh McFarlane,
Chief Executive Officer**

Catholic Healthcare Limited

This Modern Slavery Statement was approved by the principal governing body of Catholic Healthcare as defined by the Modern Slavery Act 2018 (Cth) ("the Act") on 7 May 2026.

This Modern Slavery Statement is signed by a responsible member of Catholic Healthcare as defined by the Act.



CRITERION 1 ABOUT US

Catholic Healthcare is a trusted, leading not-for-profit provider of residential care, home care and retirement living in New South Wales and Southeast Queensland. We have a strong and proud history of providing care and support to people of all faiths, backgrounds and ethnicities for over 30 years.

We are passionate about enriching our residents' and clients' lives and offer services to nurture the body, mind and spirit. Our Inspirit model of care is based upon a holistic, relationship-centred approach that puts the individual first. We offer a continuum of care that is tailored, flexible and covers every stage of life's journey. Catholic Healthcare operates 41 residential aged care homes and 13 retirement communities and provides home and community services to around 6,500 clients. Catholic Healthcare's mission is to promote the dignity, life, and spirituality of older people through connected and inclusive communities. We are guided by our values of courage, compassion and integrity.

As a trusted, leading not-for-profit entity, we have a strong and proud history of providing residential care, home care, and retirement living across New South Wales and Southeast Queensland. Catholic Healthcare has been operating for over 30 years and provides care and support to people from all faiths, backgrounds, and ethnicities.

Catholic Healthcare was founded in 1994 by the Bishops of the Province of Sydney at the request of six founding members: Sisters

of Charity, Sisters of St Joseph (NSW Province), Sisters of Mercy (Singleton), Little Company of Mary, Sisters of St John of God and Brothers of St John of God.

Guided by our Members and Trustees, Catholic Healthcare has a single operating entity, Catholic Healthcare Limited. Catholic Healthcare Limited operates as an integrated provider of aged care services through two (2) divisions:

Operations	• Residential aged care homes • Retirement living communities • Social housing for seniors • Home Care Packages • Commonwealth Home Support Services • Homelessness services • Hoarding and squalor services • Assessment services for seniors
Corporate Services	• Mission • Human Resources • Information Technology • Finance • Property • Strategy and Growth • Practice, Quality and Risk • Company Secretariat • CEO Office

CRITERION 2

OUR STRUCTURE, OPERATIONS AND SUPPLY CHAINS

Our Governance Framework

As a Catholic service provider, Catholic Healthcare is concerned with the welfare of all persons, particularly the most vulnerable. Our approach to care is informed by the Parable of the Good Samaritan.

Our Trustees and Board, who both have oversight and governance of Catholic Healthcare's mission, are conscious of the risks of modern slavery infiltrating supply chains and, as a result, actively encourage management to progress initiatives aimed at identifying and addressing modern slavery risks.

Modern slavery oversight

Modern slavery risk is owned by the Catholic Healthcare executive role of Chief Financial Officer with direction and oversight of the modern slavery activities provided by the Catholic Healthcare Environmental Social and Governance (ESG) Working Group.

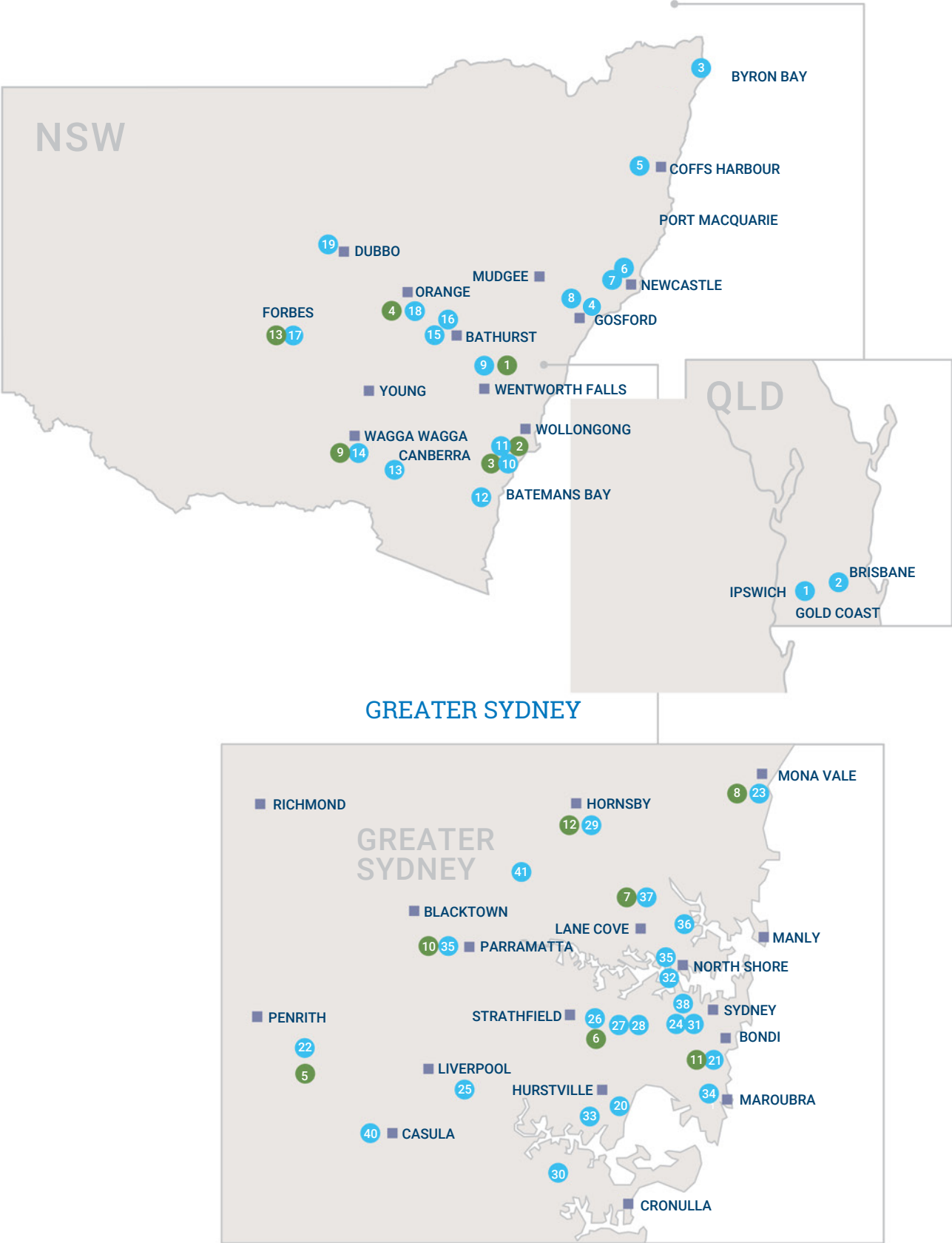
Our Procurement, Human Resources and other departmental teams have continued to make further improvements in organisational policy and procedures and educational initiatives relating to modern slavery.

AT A GLANCE

As at 31 December 2025



OUR LOCATIONS



OUR LOCATIONS

RESIDENTIAL CARE

- 1 **VILLA MARIA CENTRE**
Eastern Heights
- 2 **VILLA MARIA**
Fortitude Valley
- 3 **COOLAMON VILLA**
Mullumbimby
- 4 **HOLY CROSS**
Kincumber
- 5 **ST JOSEPH'S AGED CARE**
Coffs Harbour
- 6 **CHARLES O'NEILL**
Mayfield West
- 7 **ST JOHN'S VILLA**
New Lambton
- 8 **OUR LADY OF LORETO GARDENS**
Hamlyn Terrace
- 9 **BODINGTON**
Wentworth Falls
- 10 **ST MARY'S**
Berkeley
- 11 **VILLA MARIA CENTRE**
Unanderra
- 12 **MARANATHA LODGE**
Batehaven
- 13 **BLAKENEY LODGE**
Tumut
- 14 **THE HAVEN**
Wagga Wagga
- 15 **MACQUARIE CARE CENTRE**
Bathurst
- 16 **ST CATHERINE'S**
Bathurst
- 17 **JEMALONG RESIDENTIAL VILLAGE**
Forbes
- 18 **ST FRANCIS AGED CARE**
Orange
- 19 **HOLY SPIRIT DUBBO**
Dubbo
- 20 **BETHLEHEM HOUSE**
Kogarah
- 21 **BRIGIDINE HOUSE**
Randwick
- 22 **EMMAUS VILLAGE**
Kemps Creek
- 23 **GEORGE MOCKLER HOUSE**
Mona Vale
- 24 **GERTRUDE ABBOTT AGED CARE**
Surry Hills
- 25 **HOLY SPIRIT AGED CARE**
Revesby
- 26 **HOLY SPIRIT**
Croydon
- 27 **LEWISHAM NURSING HOME**
Lewisham
- 28 **LEWISHAM RETIREMENT HOSTEL**
Lewisham
- 29 **MCQUOIN PARK**
Wahroonga
- 30 **PERCY MILES VILLA**
Kirrawee
- 31 **THE SISTER ANNE COURT**
Surry Hills
- 32 **ST ANNE'S AGED CARE**
Hunters Hill
- 33 **ST BEDE'S HOME**
South Hurstville
- 34 **ST JAMES VILLA**
Matraville
- 35 **ST JOSEPH AGED CARE**
Hunter Hill
- 36 **ST PAUL'S**
Northbridge
- 37 **ST PETER'S**
Lane Cove North
- 38 **VINCENTIAN AGED CARE SERVICE**
East Sydney
- 39 **ST HEDWIG VILLAGE**
Blacktown
- 40 **HOLY SPIRIT**
Casula
- 41 **MACKILLOP HOUSE**
Norwest

RETIREMENT LIVING

- 1 **AQUINAS COURT**
Springwood
- 2 **BISHOP McCABE RETIREMENT VILLAGE**
Towradgi
- 3 **ST MARY'S RETIREMENT LIVING**
Berkeley
- 4 **THE BAILLY**
Orange
- 5 **EMMAUS RETIREMENT VILLAGE**
Kemps Creek
- 6 **THE BRIGHTON**
Croydon
- 7 **ST PETER'S GREEN**
Lane Cove North
- 8 **CHARLES O'NEILL**
Mona Vale
- 9 **THE HAVEN**
Wagga Wagga
- 10 **ST HEDWIG VILLAGE**
Blacktown
- 11 **STRATHALLEN VILLAGE**
Randwick
- 12 **MCQUOIN PARK RETIREMENT LIVING**
Wahroonga
- 13 **JEMALONG RESIDENTIAL VILLAGE**
Forbes

CORPORATE SUPPORT OFFICE

Macquarie Park

HOME CARE

-  You will find us in regional and metro areas across NSW. Only key locations are shown here.



Our Supply Chain

We source a wide range of goods and services to support the delivery of aged care services to our clients and residents from more than 2,900 suppliers. These range from sophisticated global service providers to sole traders in the following key categories:

- **Food and beverages** sourced through providers who provide quality products locally or regionally.
- **Linen and laundry supplies.**
- **Medical and care supplies** including medications, incontinence aids, Protective Personal Equipment (PPE).
- **Property supplies and services** ranging from those required for new, and refurbishment of, residential care homes and retirement communities and property maintenance services for all existing properties.
- **Information technology services** including system applications for Catholic Healthcare buildings, telephone and mobile devices and computer equipment.
- **Marketing and communications services** including printing, publications and website design.

- **Workforce** including employees, consultants and labour hire / agency workers. This includes a small number of workers on visas.

Some suppliers themselves source goods that are on-sold to Catholic Healthcare. Some of these goods are sourced from overseas.

Risk Management

The risk of modern slavery is considered in our current enterprise risk of 'Failing to manage third party suppliers resulting in financial loss, reputational impacts to Catholic Healthcare and poor service delivery to our customers'. One of the identified causes of the risk is the issue of modern slavery.

This risk is owned by the Catholic Healthcare executive role of Chief Financial Officer. The Executive Risk Committee (Executive Leadership Team, Chief Legal Counsel, and Manager for Enterprise Risk) review enterprise risks on a bi-monthly basis, with oversight by Catholic Healthcare Directors in the form of the Board's Finance Audit and Risk Committee. Direction and oversight are provided by the Catholic Healthcare ESG Working Group an organisational-wide group established to coordinate, oversee, and drive the organisation's approach to environmental, social and governance (ESG) matters.

CRITERION 3

MODERN SLAVERY RISKS

Modern Slavery Risks in Operations and Supply Chain

Catholic Healthcare understands that some goods (including their component parts) may have been impacted by modern slavery practices. As explained in our previous Modern Slavery Statements, to better understand these risks, we undertook a comprehensive analysis of the top 50 suppliers by spend in our organisation to determine which and how many of our top suppliers can be categorised as 'high-risk'. We continue to analyse new key suppliers as we engage them.

In 2025, we maintained our membership with the Australian Catholic Anti-Slavery Network (ACAN) to support us in understanding the risks and eradicating modern slavery practices from our organisation.

Operational Risks

Our People

Catholic Healthcare employs around 5,500 individuals including full time, part time and casual workers. Around 79% of our workforce identify as female which is recognised to be common among the caring professions. We employ a diverse workforce with many nationalities and representation from 81 countries.

Catholic Healthcare recognises that labour hire is a high-risk category in our supply chain but is nonetheless necessary for our operations. Most of our care workforce is employed under Enterprise Agreements

approved by the Fair Work Commission, making the risk of modern slavery in our directly employed workforce low. A smaller percentage of workers in our corporate services divisions are employed under individual contracts of employment. Agency workers, when required, such as registered nurses (RN), enrolled nurses (EN), assistants in nursing (AIN) and care workers, are engaged under agency agreements with external suppliers. Other service providers, including allied health professionals and hairdressers, are engaged under individual contractor arrangements that allow for negotiation.

The use of employment agencies and labour hire contractors to procure agency workers represents a modern slavery risk category. To address this, we have updated our standard agency contracts to include robust anti-slavery clauses. These clauses ensure contractors comply with our Modern Slavery Policy and require them to report instances of modern slavery to Catholic Healthcare. To date, no contractors have raised any issues with these standard clauses.

Wages for internal employees are defined by a legally recognised collective bargaining agreement and are based on job skills and experience. Other HR-related actions Catholic Healthcare has taken in 2025 to improve the working conditions of its employees include: increasing pay rates, increasing upskilling and learning opportunities; shift bidding software to give workers more flexibility in the hours they work and the location they work; assisting some employees with Nominations for Employer Sponsored Permanent Residency and recognition programs.

Supply Chain Risks

We have adopted the ACAN Category Risk Taxonomy to define modern slavery risks.

This taxonomy provides a classification standard that identifies severity of actual or potential harm to people (saliency) in spend categories.

The ACAN Category Risk Taxonomy is based on sources such as the:

- Global Slavery Index
- International Labor Organisation (ILO), including definitions of modern slavery
- Bureau of International Labor Affairs (ILAB), U.S Department of Labor
- Global Child Forum and UNICEF.

Four key factors are also used to determine the level of risk:

- **Geography:** the country or location where a good is made or service is delivered.
- **Industry:** the sector in which the making of goods or delivery of service occurred.
- **Commodity:** the raw materials or components that comprise the goods or products.
- **Workforce vulnerability:** such as bonded visas, temporary migrants, women or children known to be employed in specific industry sectors.
- **Domus 8.7:** trends, cases, and risk intelligence identified through the Domus 8.7 remediation service, including grievances and remediation insights relevant to category and risk to workers.

ACAN Category Risk Taxonomy Classification:		
High Risk	Medium Risk	Low Risk
• Building and construction • Cleaning and security • Events and event management • Facility management and property maintenance • Finance and investment • Food and catering services • Furniture and office supplies • ICT hardware • ICT software and network services – offshore • Labour hire • Linen, laundry and textile products • Medical devices and supplies • Transport, logistic and warehousing • Uniforms and PPE • Waste management services	• Advertising & marketing • Utilities • ICT software and network services - onshore • Fleet management, consumables and maintenance • Travel and accommodation • Print/mail provider	• Professional services • Financial expenses • Government and agency fees • License/membership fees

Our original risk assessment mapped the potential for modern slavery practices across our top 50 suppliers by spend to improve our understanding of the key procurement categories that contain high risks of modern slavery.

In addition to our top 50 spend suppliers, in 2025 we applied the ACAN Taxonomy to most of our suppliers irrespective of spend and identified 2,296 out of 2,969 suppliers to be in ACAN's high risk categories.

Of these 2,296 high risk suppliers:

- 1,795 (>77%) suppliers were associated with small annual spend of <\$5K which include many sole traders servicing home & community clients.

- 1,490 (64%) suppliers were engaged in facilities management, with 646 of these providing property maintenance for home & community clients.

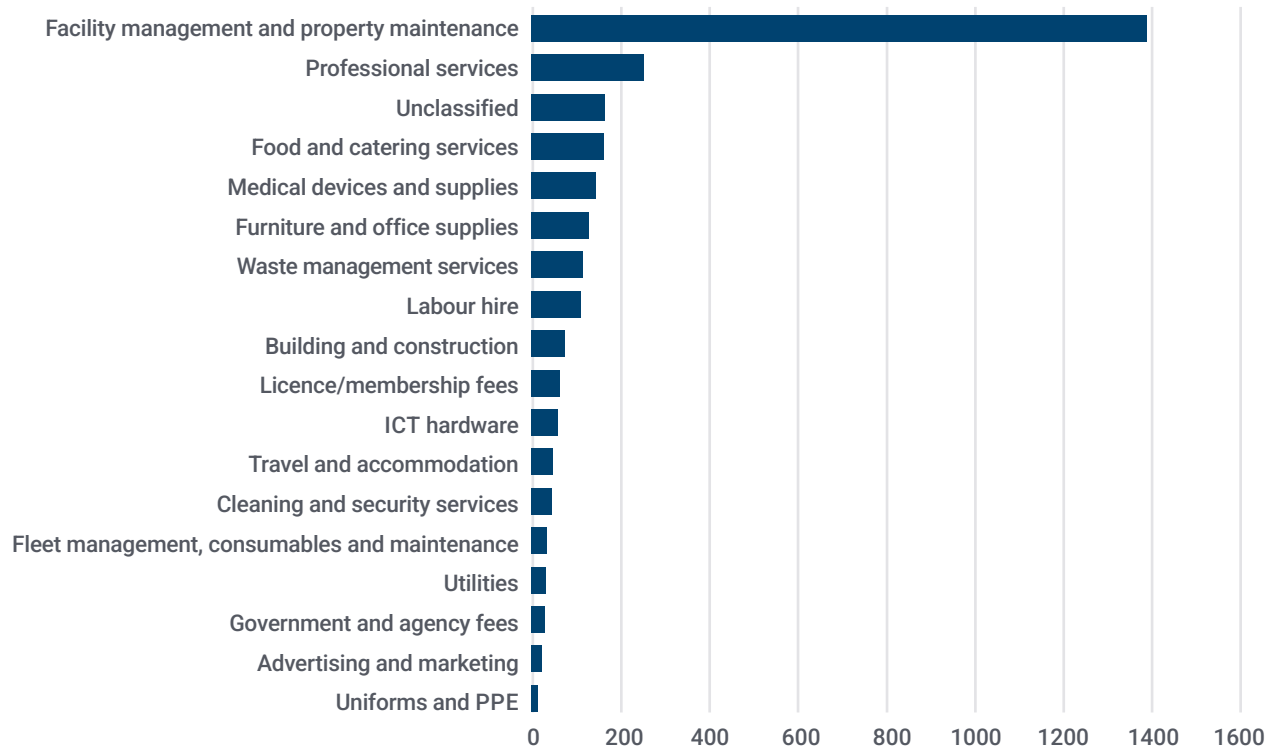
116 (3.9%) of all suppliers engaged were classified under the high-risk labour hire services category and 50% of these were engagements of <\$5K.

We concluded that our original risk assessment approach of key suppliers was still valid and we will continue to map our greater supplier base against the taxonomy.





NUMBER OF SUPPLIERS BY ACAN TAXONOMY CATEGORY



CRITERION 4

ACTIONS TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

Catholic Healthcare has prioritised internal education and establishing the structures and resources needed to support the anti-modern slavery efforts of the organisation to ensure that changes made are monitored for effectiveness.

To this end, Catholic Healthcare finalised an organisational Modern Slavery Policy in 2022. This policy is published on Catholic Healthcare's Resource Centre and is made available to contractors through a Resources for Contractors website page. The Modern Slavery Policy is regularly reviewed.

2025 RISK MANAGEMENT INITIATIVES

In the 2025 reporting period, Catholic Healthcare continued to make progress in addressing modern slavery risks within our operations, with further improvements in organisational policy and procedures, education improvements and other modern slavery risk initiatives.

- **5-year Action Plans:** with the assistance of ACAN, The Procurement team developed 5-year Modern Slavery Action Plans as a framework for each of our main business units. These will help inform and guide future action plans for each unit.
- **Uniform review:** in 2025 the Procurement team sourced a new uniform range with our Australian-based, SEDEX-registered distributor. This allowed us to reduce our uniform supply chain to two overseas manufacturers producing 95% of our uniforms. These manufacturers are also registered with SEDEX with a monitoring/ completion score of 100%.

HIGHLIGHTS: NEW RISK MANAGEMENT INITIATIVES IN 2025

- 5-year Modern Slavery Action Plans were developed for Catholic Healthcare's main business units.
- Our uniform supply chain reduced to two SEDEX registered manufacturers for 95% of items.
- A new and reduced panel of 12 nurse agencies was introduced, reducing a 2024 risk score of 11.6 out of 100 to 8.4 in 2025.
- Zipline launched to enhance the collection and oversight of compliance documents from our labour hire and indirect workforce.
- Ethical sourcing guidelines were incorporated into Catholic Healthcare's Procurement Policy.
- The Learning & Development team created a new e-learning module, 'Catholic Healthcare Stance on Modern Slavery'.

In addition, the factories are WRAP-certified, meaning they are independently audited to ensure compliance with ethical labour standards. The Procurement team sourced and reviewed the factory audit reports.

- **Labour hire:** a detailed review of our nurse agency category and tender process was conducted by our Procurement team in 2025. This is the main outsourced workforce in Residential Care and this exercise resulted in a consolidated panel from 42 to 12 preferred agencies across all homes. New contracts were entered into with all 12 agencies on Catholic Healthcare standard contract templates, which include modern slavery provisions and as part of the tender process, the preferred agency modern slavery policies were received.

In 2024, Catholic Healthcare undertook a modern slavery risk assessment of the 42 nurse agencies engaged within our supply chain, using an independent third-party consultant. The assessment was completed by 29 out of 42 and the results included an unmitigated risk score of 11.6 out of 100. The same approach applied to the 12 agencies on the 2025 preferred supplier panel showed a reduction in the risk score to 8.4 out of 100 demonstrating greater effective mitigation efforts across these 12 nursing agencies compared to the 2024 cohort.

- **Compliance of labour hire and indirect workforce:** a new third-party system, Zipline, was launched in 2025 to enhance our collection and oversight of compliance documents from our indirect workforce and meet the Aged Care reform requirements.
- **RFT requirements:** modern slavery assessment requirements continue to be included in all OPEX Request for Tender (RFT) processes led by our Procurement team and have also been added to CAPEX template RFT documents to ensure this forms part of the contractor scopes in all major property development work.

- **Ethical sourcing:** in 2025, we developed and incorporated ethical sourcing guidelines into Catholic Healthcare's Procurement Policy. Also, Catholic Healthcare's 'Leading Mission Series' was launched which includes training modules for senior leaders and management on Ethics and Catholic Social Teaching.

- **Modern slavery education:** we continue to provide modern slavery training to key employees. In 2025, our modern slavery training continued to build on the foundations established in 2023. In 2025, 83 employees completed the ACAN Modern Slavery 101 training with 253 employees now trained in the past 3 years including all Procurement, Property, Human Resources, Legal and Executive leaders. Additionally, our Learning & Development team created a new 20-minute eLearning module, 'CHL Stance on Modern Slavery' which will be the foundation training for all employees.

- **SEDEX:** the Supplier Ethical Data Exchange (SEDEX) is a global membership organisation providing organisations with tools to manage and share information about ethical sourcing and supply chain transparency. We continue to encourage all key Catholic Healthcare suppliers to be registered with SEDEX. By engaging with SEDEX in this way we foster a more transparent, compliant, and ethical supply chain which ultimately reduces the likelihood of us contributing to modern slavery practices.

At the end of the reporting period, a cumulative 118 sites had completed the Sedex SAQ, an increase from 64 total completions at the end of 2024. Of those, 109 questionnaires were completed or reviewed in 2025 (from 54 in 2024), giving us confidence that we have the most recent information available for sites in our supply chain.

Grievance and remediation

Catholic Healthcare is committed to providing prompt and suitable remediation to individuals affected by modern slavery aligning with the needs of the victims and adhering to relevant laws and guidelines, such as the UN Guiding Principles on Business and Human Rights and the Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities. This remediation includes taking action to address harm to individuals impacted by modern slavery and to mitigate future risks.

Due to the complexity of remediation, specialised resources are required to ensure the best outcomes for individuals affected by modern slavery. To address this, Domus 8.7, a not-for-profit established by the Catholic Archdiocese of Sydney, provides remedy pathways and a confidential

advisory service to individuals affected by modern slavery.

Domus 8.7 handles any cases referred by Catholic Healthcare, directing victims to specialists who provide legal, social, and human rights support. It will also collaborate with international organisations to achieve remedial outcomes and enhance risk management and promote prevention strategies.

In 2025, Catholic Healthcare did not find any cases of modern slavery in its operations.

Referrals

Contacts made via the Catholic Healthcare worker voice/grievance mechanism, Employee STOPLine were:

- 33 (2024)
- 8 (2025)



CRITERION 5

ASSESSING EFFECTIVENESS

Baseline Data

This dataset provides a foundational assessment of supplier engagement, transparency, and modern slavery risk management. It helps identify key trends, areas requiring further attention, and opportunities for strengthened due diligence. The data points included reflect both supplier visibility and compliance activities, ensuring a comprehensive approach to ethical sourcing and governance.

	ACTIVITY	2023	2024	2025
INTERNAL / EMPLOYEES	Hours spent on modern slavery activities	240	210	90
	Individual employee completed e-learning	157	175	84
	E-learning modules completed	298	316	168
EXTERNAL / SUPPLIER ENGAGEMENT	Total number of suppliers	2373	2226	2969
	Number of suppliers with visible contact information and ABN	128	2218	2851
	Number of suppliers across high-risk categories	128	782	2296
	Number of ACAN Supplier Surveys completed (cumulative)	62	271	537
	Supplier staff attending capacity building webinars	69	41	26
	Invited to join Sedex (cumulative)	31	66	114
	Joined Sedex (cumulative)	15	72	99
	Sedex SAQ completed (cumulative)	22	64	118
DOMUS 8.7 EXTERNAL REFERRALS	Contacts made via worker voice / grievance mechanism	0	33	8
	Referrals for advice and assistance	0	0	0
	Individuals identified or referred for modern slavery assessment	0	0	0
	Individuals with modern slavery cases remediated	0	0	0



The increase in the number of external suppliers engaged reflects a change in focus from previous years to incorporate as many suppliers as possible from the suppliers used in 2025 including those engaged for small one-off services.

The increase in the number of high-risk suppliers reflects the adoption of the ACAN Category Risk Taxonomy and inclusion of smaller suppliers.

As mentioned in Criterion 3:

- Close to 80% of these high-risk suppliers were associated with a small annual spend of <\$5K which include many sole traders servicing home & community clients.
- Only 3.9% of all suppliers engaged were classified under the high-risk Labour Hire Services category and 50% of these were engagements of <\$5K.

Continuous Improvement

Catholic Healthcare seeks to track our progress in relation to modern anti-slavery action by setting goals and future action plans for each year. We will continue to use goal setting/action plans and assessment of completion against these as our primary metric for measuring the success of modern slavery initiatives and our continuous improvement.

We will also continue to review and evaluate our performance with assistance of ACAN and through the SEDEX SAQ risk measurement system.

We completed the SEDEX SAQ survey in 2025 and this will provide a further benchmark for continuous improvement in future years.

The Catholic Healthcare risk scores from SEDEX SAQ were:

Management controls – 3.5/5 (Good)

Measures suppliers' risk management (0–5, with 5 as best) to assess effectiveness and target improvements.

Labour standards	Health and safety	Business ethics	Environment
3.3/5	4/5	2.7/5	0/5
(GOOD)	(ADVANCED)	(MODERATE)	(POOR)

Section title	Points available	Points achieved	% of points achieved	Score
Profile	4	1	25%	1.3 (Fair)
Workplace Impact	4	4	100%	5.0 (Advanced)
Management systems	34	31	91.2%	4.6 (Advanced)
Freely chosen employment	37	24	64.9%	3.3 (Good)
Freedom of association	7	7	100%	5.0 (Advanced)
Health and safety	53	44	83%	4.2 (Advanced)
Children and young workers	13	4	30.8%	1.6 (Fair)
Wages	27	15	55.6%	2.8 (Moderate)
Working hours	17	10	58.8%	3.0 (Moderate)
Discrimination	41	18	43.9%	2.2 (Moderate)
Regular employment	2	2	100%	5.0 (Advanced)
Discipline and grievance	28	24	85.7%	4.3 (Advanced)
Communities and human rights	12	7	58.3%	2.9 (Moderate)
Business ethics	10	7	70%	3.5 (Good)

Risk score summary

Company name	Site name
Catholic Healthcare ZC number: ZC417021045	Catholic Healthcare Limited ZS number: ZS1000092532

Combined risk score – (Low risk)

3.8/10

Score breakdown by pillar

Highlight strengths and opportunities to help businesses focus their efforts on key areas that drive ethical and sustainable practices.

Inherent risk – 3.3 / 10 (Low risk)

Labour standards	Health and safety	Business ethics	Environment
3/10	4.8/10	2.6/10	3.8/10

Site characteristics risk – 5.1 / 10 (Medium risk)

Labour standards	Health and safety
5.2/10	4.7/10

There were no instances of modern slavery reported or found within our operations or associated with our supply arrangements in 2025. However, we appreciate this does not necessarily mean we have no cases of modern slavery in our supply chains.

Catholic Healthcare, as part of our continuous improvement efforts, continues to review the effectiveness of our modern slavery risk management procedures, including assessment of high-risk suppliers across different departments and awareness training as described in this Statement.

Additional future actions planned are highlighted in CRITERION 7.

CRITERION 6

CONSULTATION WITH OWNED OR CONTROLLED ENTITIES

Catholic Healthcare has one current operating entity, Catholic Healthcare Limited.



CRITERION 7 ANY OTHER RELEVANT INFORMATION

Planned Future Actions

Catholic Healthcare will continue with the initiatives launched in 2025 and in previous years and include new initiatives in our 2026 plans to further mitigate modern slavery risks such as:

- The commencement of 5-year Action Plans by Information Technology, Property Services and Home and Communities.
- Learning and Development – the expansion of awareness training with the rollout of a new modern slavery training module which will extend to all employees and incorporated into the education onboarding process of all new employees.
- The launch of a new contract management system which will incorporate collection of supplier modern slavery data such as statements and policies.





catholichealthcare.com.au



2025 Modern Slavery Statement

1 January – 31 December 2025



Disclosure Note

This statement has been made on behalf of Dominican Education Australia Ltd ABN 54 610 124 322. This statement is prepared pursuant to section 13 of the *Modern Slavery Act 2018* (Cth) and covers Dominican Education Australia as a single reporting entity, comprising Dominican Education Australia Ltd and its following Education Ministries

Educational Ministry	ABN
Santa Sabina College Ltd	88 003 415 450
St Mary's College Ltd	87 423 943 103
St Dominic's Priory College Ltd	25 085 110 379
Cabra Dominican College Ltd	55 403 574 164
St Lucy's School Ltd	60 085 372 863
Siena College Ltd	85 756 114 223

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Hunters Hill NSW 2110
www.dominican.edu.au

Contact for modern slavery:

Robert Napoli
Chief Executive Officer
rnapoli@dominican.edu.au

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Foreword, Approval and Signature

The Board of Dominican Education Australia Ltd (DEA) is pleased to submit our 2025 Modern Slavery Statement to the Australian Government as part of the Australian Catholic Anti-slavery Network (ACAN) 2025 Compendium of Modern Slavery Statements.

DEA recognises that the term modern slavery is used to describe situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom. We understand that slavery can take many forms, such as human trafficking, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services, and child labour.

We also recognise that modern slavery is only used to describe serious exploitation and it does not include practices like substandard working conditions or underpayment of workers. However, these practices are also illegal and harmful and may be present in some situations of modern slavery.

DEA is committed to ensuring that effective policies and procedures are in place to address modern slavery risks to people within our Ministries' business operations and supply chains.

Our collective intention is to actively identify and manage risks related to human rights across our network and through the management of our various supply chains.

In addition, DEA is a member of the Australian Catholic Anti-Slavery Network (ACAN) which brings together Catholic entities to share resources and coordinate action to manage modern slavery risk across their respective industry sectors.

DEA takes pride in our Catholic ethos and the Dominican heritage imbued in all our Ministries. The ethical and compliant approach that each Ministry takes to providing education to its students is clearly articulated in their Codes of Conduct. In this way, we work to build a more sustainable future for our students and the communities in which we operate.

This statement is published by DEA and is consistent with the reporting obligations under the Modern Slavery Act 2018 (the Act). The statement is prepared by DEA on behalf of itself and its Ministries, which are controlled entities.

This statement sets out how we are working within our Ministries to assess and address the risk of modern slavery in those Ministries' operations and supply chains and continuously improve our response.

Tony O'Byrne – Chairperson



Paul Reid – Treasurer



This Modern Slavery Statement was approved by the principal governing body of Dominican Education Australia as defined by the Modern Slavery Act 2018 (Cth) ("the Act") on 19 June 2026.

This modern slavery statement is signed on behalf of Dominican Education Australia by two responsible members as defined by the Act.

Reporting Criterion 1: About Dominican Education Australia

Dominican Education Australia (DEA), is a Public Juridic Person (PJP) established in 2015 under the Canon Law of the Roman Catholic Church and is also a company limited by guarantee under the Corporations Act 2001. DEA was established by three congregations of Dominican Sisters - the Congregation of the Dominican Sisters of North Adelaide, the Holy Cross Congregation of Dominican Sisters, Adelaide and the Congregation of the Dominican Sisters of Eastern Australia and the Solomon Islands.

As a PJP, the Trustees of DEA have responsibility in canon law for its six separately incorporated education Ministries. As DEA and each of its Ministries is an incorporated charity registered with the Australian Charities and Not-for-profits Commission, DEA's Board of Trustees oversees the governance arrangements in place for the six incorporated Ministries.

In 2025, the aggregated operational turnover of DEA and its six Ministries amounted to \$208 million.

	Dominican Education Australia Limited	Is a Public Juridic Person and parent entity of six education Ministries in New South Wales, Victoria and South Australia
	St Lucy's School Limited	Provides K-12 education for children with disabilities specialising in a wide range of disabilities: mild to severe intellectual disability, autism and sensory impairments.
	Santa Sabina College Limited	Provides education for girls K-12 and boys K-4. It operates an Early Childhood Centre for children from the age of six weeks to six years.
	Siena College Limited	Provides young women with secondary school education, fostering intelligent and responsible use of their personal gifts.
	St Dominic's Priory College Ltd	Provides Reception to Year 12 education. Students are motivated to achieve personal excellence whilst maintaining a collaborative approach to their learning.
	St Mary's College Ltd	Provides Reception to Year 12 education, empowering young women through the key areas of Learning, Relationships and Innovation.
	Cabra Dominican College Ltd	Provides a co-educational experience for students in Years 7–12, fostering a culture of forward-thinking, in a place where tradition meets innovation.

Our Mission

Every person is important in the community of DEA. Our Ministries strive to be inclusive, caring and welcoming. DEA's mission is to nurture its Ministries as places of excellence in teaching and learning in the Catholic tradition. Dominican schools have always been characterised by a strong commitment to outreach and social justice. They encourage critical thinking and develop self-confidence.

Our Vision

The vision of DEA is to continue and further enliven the works of DEA and takes its vision from the inspiration of Jesus Christ and the spirit of St Dominic de Guzman, the founder of the Order of Preachers. It assumes the responsibility to further the education Ministries of its three founding Dominican Congregations and continues to build on the founding grace and traditions of each of these Congregations.

The Dominican Ideals

The Dominican ideals are a commitment to Truth explored in Dialogue, a vibrant Preaching of the Gospel, a critical appreciation of culture and cultures, and a love of the Beautiful. Our goal in each of our Education Ministries is to foster these values, together with a spirit of prayer and contemplation, respect for the dignity and uniqueness of each individual, and the pursuit of excellence.

Our goal is for DEA education Ministries to be communities defined and characterised by:

- an emphasis on fostering those Ministries' right relations with God, others and creation
- a strong Catholic identity and practice of Christian values
- a search for truth
- a philosophy of education that understands the role of the teacher as an enabler of students' learning
- a commitment to critical reflection and action in responding to issues of injustice
- a commitment to marginalised and vulnerable students
- stewardship that seeks to ensure that spiritual and material resources are used for the common good.

Priorities

This is our third Modern Slavery Statement. DEA has progressed from 2023 where there was implementation of a modern slavery risk management program at one of our Ministries, Siena College Limited. Based on the lessons learned and experience from working with Siena College in 2023, DEA has extended the program in 2024 to four of its Ministries and fully implemented the ACAN risks management program with all six Ministries in 2025.



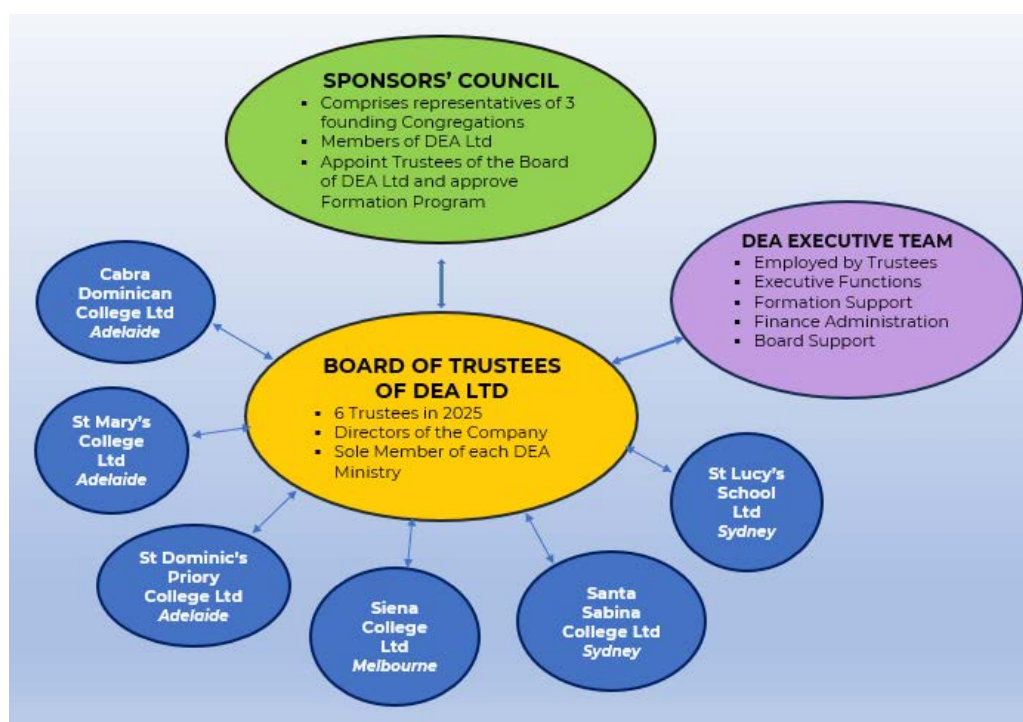
Reporting Criterion 2: Our Structure, Operations and Supply Chains

Our Organisational Structure

DEA was established in 2015 by decree of the Holy See of the Roman Catholic Church.

DEA continues the mission of Jesus Christ and assumed responsibility for the stewardship of the six incorporated education Ministries in Australia formerly under the responsibility of the Dominican Sisters of Eastern Australia and Solomon Islands, the Holy Cross Congregation of Dominican Sisters of Adelaide and the Dominican Sisters of North Adelaide.

DIAGRAM SHOWING ORGANISATIONAL STRUCTURE OF DEA



The Sponsors Council is comprised of three members, being one representative appointed by each of the three founding Congregations. One of their powers is to appoint Trustees to the Board of DEA.

Dominican Education Australia Ltd was established for the purpose of owning and nurturing the education Ministries of DEA in the Commonwealth of Australia. The Trustees of DEA, appointed by the Sponsors, fulfil a governance role and work in a way that recognises the individual rights and responsibilities of the incorporated bodies (Education Ministry Boards) and affirms the importance and subsidiarity of each Ministry.

The six Trustees that comprised the Board of DEA in 2025, have responsibility for both canonical and civil governance matters. To assist with this oversight, the DEA Board maintains the following Subcommittees:

- Finance & Risk
- Safeguarding
- Mission and Formation

DEA Trustees appoint the Directors of the Board of each incorporated Education Ministry; appoint the Chair of the Board of Directors; and, in collaboration with the Ministry Board, approve the appointment of the Principal of the School/College.

In accordance with their respective Constitutions, each incorporated DEA Education Ministry has a Board which oversees the management of the business of that Ministry. Those Ministry Board Directors are, among their other responsibilities, accountable to DEA Ltd as the sole Member of the Ministry.

DEA Modern Slavery Working Group (MSWG)

In 2025, the DEA MSWG was comprised of:

- the DEA CEO
- a DEA Finance & Risk Committee Member
- the Business Manager from each Ministry
- other representative stakeholders from each Ministry
- ACAN representatives

The MSWG is accountable to the Finance and Risk Subcommittee through the CEO, who chairs the MSWG and provides a progress report to the Trustees every 2 months.

15 meetings took place in 2025.

Operations

The following provides a snapshot of the operations of DEA Ministries in 2025:

- Six Ministries operated Catholic schools in South Australia (3), Victoria (1) and New South Wales (2)
- 4,791 students were educated in Dominican Education Australia Ministries

Workforce Profile

DEA and its Ministries maintain a diverse workforce, encompassing both direct employees and indirect workers engaged through third-party arrangements.

As at the reporting period:

- Direct employees: DEA and its Ministries employ a total of 838 direct employees, comprising permanent and fixed-term staff across its Ministries. This workforce includes teaching, leadership, and administrative/support staff. DEA continues to monitor workforce composition, including gender representation, to support equitable employment practices (21% *male* / 79% *female*).
- Indirect workers: DEA Ministries engage approximately 50 indirect workers, consisting of individuals employed through labour hire agencies, contractors, and subcontracted service providers.

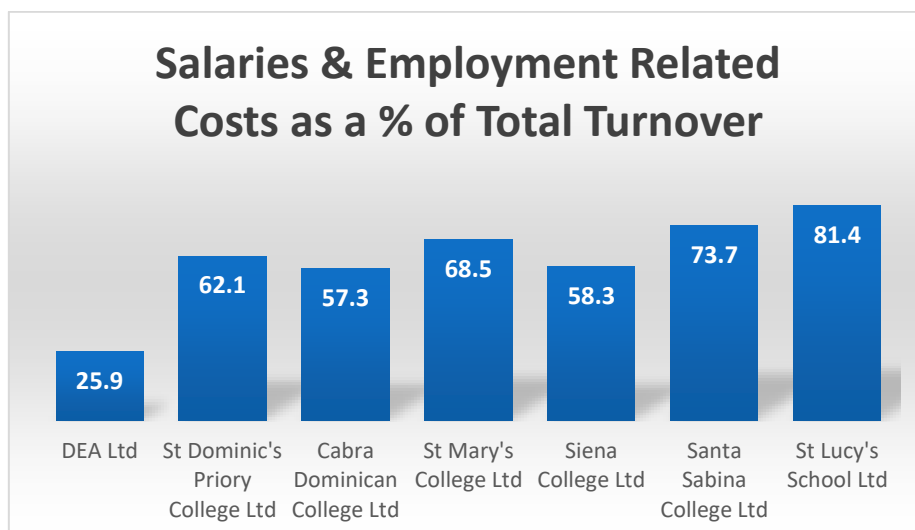
For the purpose of this Statement, indirect workers are defined as individuals who are not directly employed by DEA Ministries but who perform work or provide services through third-party contractual arrangements. These include, for example:

- Agency staff engaged to support short-term operational needs
- Contractors delivering specialist services
- Subcontracted personnel supporting facilities, maintenance, and other outsourced functions

This distinction enables DEA to better assess and manage modern slavery risks across both its direct workforce and its extended supply chain.

Supply Chains, Goods and Services

Each of DEA's six Ministries is an educational institution. Accordingly, the majority expenditure is on teaching staff and learning and support staff. DEA Ltd is the sole member of those Ministries and the majority of its expenditure is also staff related. This is represented in the graphic below:



Most staff are employed directly by the Ministries, and wages are paid in accordance with the relevant Enterprise Agreements or legislated awards.

The aggregated total procurement spend for DEA and its six Ministries is: \$48,856,069

The following categories support our Ministries' operational requirements:

Banking
Business support services
Facilities

Information Technology
Marketing
Professional services

Support services
Telecommunications
Travel



Reporting Criterion 3: Modern Slavery Risks

DEA uses the ACAN Category Risk Taxonomy, a classification standard that identifies inherent or potential modern slavery risks associated with major spend categories.

The ACAN Category Risk Taxonomy is based on sources such as:

- the Global Slavery Index
- the International Labor Organisation (ILO), including definitions of modern slavery
- the Bureau of International Labor Affairs (ILAB), U.S Department of Labor
- the Global Child Forum and UNICEF

Four key factors are also used to determine the level of risk:

- **Geography:** the country or location where a good is made
- **Industry:** the sector in which the making of the good or service occurred
- **Commodity:** the raw materials or components that comprise the goods or products
- **Workforce vulnerability:** such as temporary migrants, women or children known to be employed in specific industry sectors

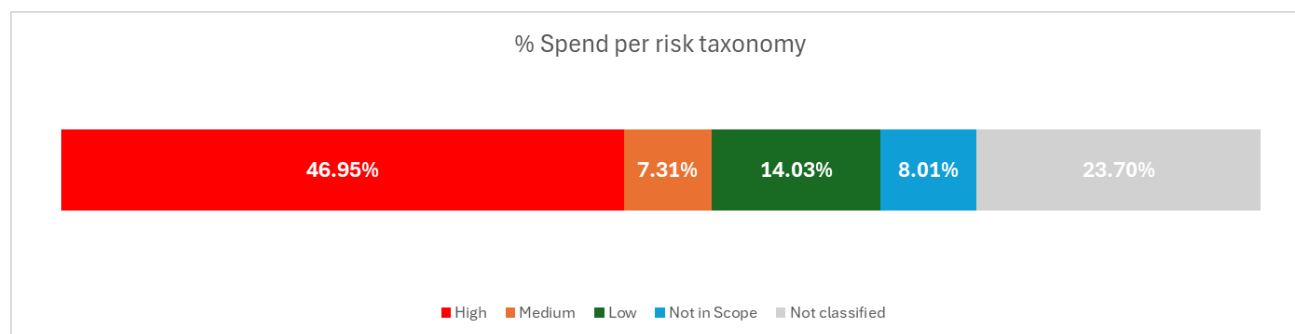
Classification

High Risk	Medium Risk	Low Risk
• Building and construction • Cleaning and Security • Events and event management • Facility management and property maintenance • Finance and Investment • Food and catering services • Furniture and office supplies • ICT Hardware • ICT Software and network services - offshore • Labour Hire • Linen, laundry and textile products • Medical devices and supplies • Transport, logistic and warehousing • Uniforms and PPE • Waste management services	• Advertising & Marketing • ICT Software and network services - onshore • Utilities • Fleet management, consumables and maintenance • Travel and accommodation • Print / Mail Provider	• Professional services • Financial expenses • Government and agency fees • License / membership fees

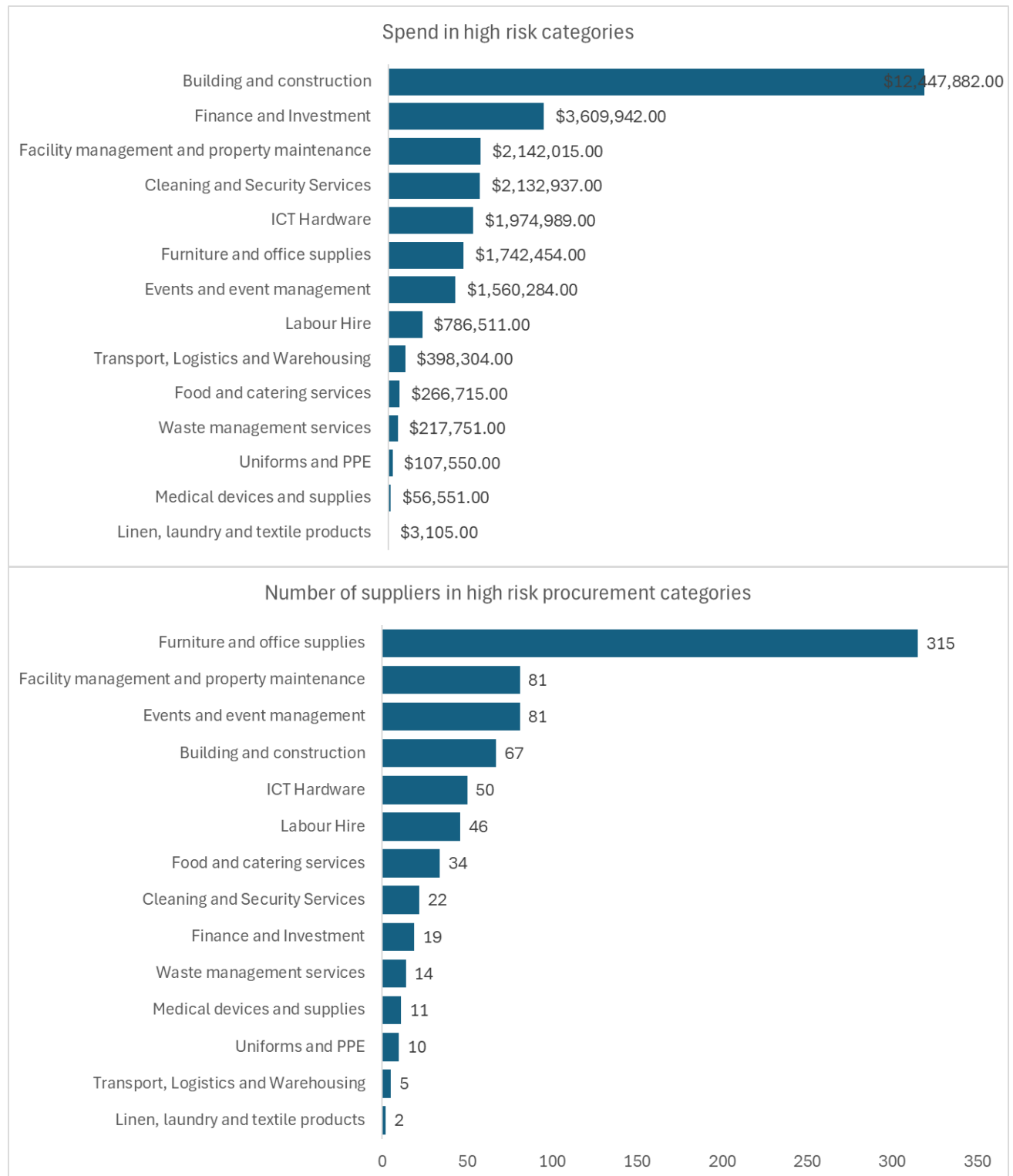
Pastoral and payroll categories (excluding labour-hire and sub-contracting) are Not in Scope of the ACAN Category Risk Taxonomy. Therefore, the following figures that are provided do not include such expenditure.

The key risks for DEA, as a group, are in the acquisition of products and services that are sourced, either wholly or in part, outside of Australia, particularly as they might relate to the construction, furnishing and maintenance of our Ministries' education facilities.

Based on ACAN's analysis of \$35,182,000 of spend data provided by four of our Ministries, the following percentage of spend and risk bar illustrates DEA's main areas of priority for action. The highest spend percentage for DEA Ministries is with suppliers considered more likely to be high risk according to ACAN's risk taxonomy. This does not mean that all or a majority of the suppliers themselves are inherently High Risk. We also recognise the risks involved with school uniforms that are not procured by the school and the need for action with these suppliers.



A further analysis of DEA and its Ministries has identified the following procurement categories which are designated as High Risk under the ACAN Taxonomy. This spend is with 724 suppliers, with building and construction being the highest at \$12,447,882.00.



DEA continues to compile data regarding specific supplier procurement practices at each of our Ministries to determine the level of inherent risk.

Reporting Criterion 4: Actions Taken to Assess and Address Modern Slavery Risks

DEA continues to work with ACAN to increase its collective response to address modern slavery in our operations and supply chains. In 2025 DEA's modern slavery risk management program increased actions to obtain more comprehensive and accurate supplier data from each of our Ministries. This enhanced supplier spend and data analysis increased our supplier engagement by ACAN to address our supply chain risk.

ACAN Supplier Engagement

The ACAN Program provides supplier engagement support and data, enabling a systematic and comprehensive supply chain risk assessment. In 2025 the ACAN Modern Slavery Risk Management Program launched a new purpose-built data management platform - ROTA. ROTA centralises the ACAN Risk Management Program framework and facilitates supplier performance, evaluation and engagement through:

1. Evaluation of modern slavery risks within operations and supply chains, using the ACAN Risk Taxonomy
2. ACAN Supplier Survey to identify supplier revenue, number of employees, countries of origin for goods sourced overseas, workforce contractual arrangements and Sedex membership status
3. Supplier education on modern slavery and risk management in key areas: cleaning, building and construction, procurement of labour, labour hire and services, sourcing goods from overseas, grievance mechanisms and remediation
4. Onboarding suppliers to Sedex platform requiring a business address, contact details and goods or services provided
5. Sedex Self-Assessment Questionnaire (SAQ) completion to help suppliers to evaluate their practices against established standards and identify areas for improvement
6. Desktop review to identify key actions required from suppliers
7. Enhance supplier screening using Know Your Client (KYC) intelligence software
8. Corporate Social Compliance Audits to provide a point in time, objective and independent verification process of supplier alignment with local laws and worker wellbeing standards
9. Domus 8.7 Index modern slavery statement assessment on selected suppliers in high-risk categories
10. ACAN Prequalified Supplier Directory - a list of preferred suppliers accessible to Catholic organisations

The following represents the collective progress made in 2025 by DEA and its Ministries:

SEDEX Membership

Through ACAN, DEA is also a member of SEDEX (Supplier Ethical Data Exchange). Sedex's Self-Assessment Questionnaire (SAQ), risk analytics and SMETA audit tools enable us to identify and prioritise high-risk suppliers, verify labour practices, and monitor corrective actions. This supports our due diligence processes by providing structured, comparable data and enabling continuous improvement.

Insights from Sedex inform our engagement with suppliers, guide capacity-building activities, and strengthen our ability to prevent, mitigate and remediate modern slavery risks. Sedex enables mapping of multi-tier supply chains, giving us visibility into subcontractors and upstream suppliers. The Sedex Self-Assessment Questionnaire (SAQ) provides a consistent framework for suppliers to disclose information on labour practices, recruitment, subcontracting, grievance mechanisms, and workforce demographics.

An overview of DEA and its Ministries' Supplier Engagement in 2025 is set out below.

Total suppliers

3,559

Suppliers in High Risk procurement categories

725

ACAN Supplier Surveys completed

792

ACAN Supplier Surveys completed in 2025

360

Suppliers identified for Sedex Onboarding

91

Sourcing Countries for Tier 1 Suppliers

Overall inherent risk cate... ● high ● low ● medium



Supplier e-mail shared

2488

Supplier Communication

6746

Suppliers completing e-learning

34

Supplier Screening - ACAN Collated

Enhanced 3rd Party Supplier Screening

529

3rd Party Supplier Screening - High and Medium Risk

25

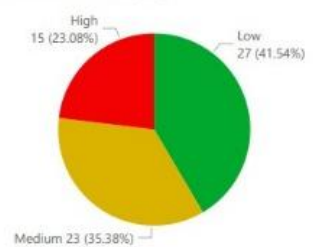
Suppliers on Sedex

77

SAQs Completed

54

Sedex SAQ Risk Category



Audits Visible

9

Audits Findings

36

The following represents best practice within DEA and its Ministries in 2025, with the intention that all Ministries will be working towards implementing these actions:

- Modern Slavery included in Annual Action Plan and in Strategy towards 2030
- Modern Slavery Included in Ministry Risk Register
- Ministry Staff Completion of online ACAN Staff Awareness Survey
- Presentation to all Staff on Modern Slavery and details around engaging suppliers shared with Staff
- Embedding Modern Slavery in the Religious Education Curriculum

Grievance Mechanism and Remediation Pathways

DEA is committed to providing appropriate and timely remedy to people impacted by modern slavery in accordance with the United Nations Guiding Principles on Business and Human Rights, the Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities and relevant Australian laws.

In addition to our Modern Slavery Policy, DEA has a Safeguarding Policy, Code of Conduct and Complaints Process that are publicly available and apply to staff, volunteers and contractors.

When suspicions or indicators of modern slavery come to our attention through whistle-blower or other channels, staff will contact relevant law enforcement agencies and/or Domus 8.7 for an assessment, investigation, action planning and implementation of a remediation process.

Where DEA or any of its Ministries is directly linked to modern slavery by a business relationship, we are committed to working with the entity which caused the harm, to ensure remediation and mitigation of its recurrence.

Remediation obligations and expectations are included in contracts with high-risk suppliers who must notify and consult with DEA to ensure victim-centered remediation processes are implemented to the satisfaction of DEA.

As an ACAN member, DEA has access to Domus 8.7, an agency providing a remedy pathway and support to people impacted by modern slavery.

Domus 8.7 provides DEA with:

- resources that enable us to listen to workers (grievance channel)
- a 24/7 careline for workers on our sites, staffed by professional counsellors
- direct support to people impacted by modern slavery
- guidance and technical assistance to prevent, identify and remediate modern slavery
- a documented process to assess if an organisation has caused, contributed or is directly linked to modern slavery and modern slavery indicators

Domus 8.7 empowers people impacted by modern slavery to have choice and control over what forms of remediation are meaningful to them and to engage safely with business/supply chain actors. Supports may include:

- modern slavery indicator assessment
- needs assessment, case coordination, response and remediation planning
- referrals to community, social services, unions
- transport, accommodation, financial and food support
- legal support, referrals, accompaniment and advocacy
- job training, retraining and redeployment
- accompaniment and advocacy to engage with government and law enforcement agencies
- opportunities to contribute lived expertise to improve modern slavery responses

The Domus 8.7 Advisory Committee Members also include a person with lived expertise, Mr Moe Turaga. Domus 8.7 is a registered charity with the Australian Charities and Not-for profits Commission (ACNC) and is an endorsed Public Benevolent Institution with Deductible Gift Recipient (DGR) status.

When indicators of modern slavery practices come to our attention through any of our channels, staff will contact relevant law enforcement agencies or regulatory agencies and/or Domus 8.7 for an assessment, investigation, action planning and implementation of a remediation process.

During the 2025 reporting period, DEA did not receive any complaints, disclosures or concerns relating to modern slavery.



Modern Slavery Action Plan and Road Map: DEA & its Six Ministries

DEA is continuing to develop supplier analysis based on procurement over a calendar year across all Ministries.

The CEO of DEA is working in collaboration with Ministry Business Managers to:

- gather the supplier data for analysis by ACAN, and
- ascertain the actions to be taken by each Ministry in 2026

DEA and its Ministries will continue to prioritise the following tasks:

FOCUS	Priorities
<i>Strategy & Compliance</i>	Define DEA Modern Slavery Framework [align with ACAN risk management program] Approve a Modern Slavery Policy that includes expectations in relation to sourcing of goods and services. Complete ACAN Entity Profile Survey to obtain a maturity capability assessment for 2026.
<i>Risks</i>	Ministries work with ACAN to understand and address modern slavery risks to people in their operations and supply chain using quality resources, risk ratings, agreed metrics and scorecards. Create a category in each Ministry's Risk Register for Modern Slavery and define their risk appetite.
<i>Supplier Due Diligence</i>	Modern slavery pre-qualification requirements included into all 2026 contracts and requests for tender, including future building tenders. - Supplier Survey [entry point engagement = 20 questions, 5 mins to complete] - Webinar attendance/training completion - Sedex membership and Self-Assessment Questionnaire (SAQ), as requested Implement a standard contract clause for significant purchases in selected procurement categories. Complete the ACAN Supplier Data spreadsheet with supplier data that will inform supplier risk prioritisation and engagement strategy. Commence supplier engagement in collaboration with ACAN. ACAN to monitor and report on supplier engagement and escalate non-responses or other issues to DEA and Ministries, as required.
<i>Staff</i>	Use internal communications channels to engage our staff. Staff to complete ACAN's Staff Awareness Survey to provide a baseline for knowledge, attitudes and beliefs. This can inform future actions. Members of the leadership team, and Board Chair, undertake the assigned ACAN modern slavery e-learning modules (four modules are included in the course).
<i>Students & Families</i>	Consider opportunities to include the topic of anti-Modern Slavery in the school curriculum. e.g. in the Religious Education Curriculum, Humanities and other curriculum areas. Provide avenues for students to actively engage in anti-slavery action-learning - 8 February Feast Day of St Josephine Bakhita - 8 March International Women's Day - 1 May Feast Day of St Joseph the Worker and International Workers Day - 30 July UN World Day Against Trafficking in Persons - 11 October International Day of the Girl Child - 2 December UN World Day for the Abolition of Slavery - School events – ACAN team member in each Ministry's geographic location Communicate our anti-slavery commitment to stakeholders - Website / Social media / Newsletters

Reporting Criterion 5: Effectiveness of Actions Taken under Criterion 4

Continuous Improvement

The ACAN Baseline Data table shows improvement that can be attributed to increased engagement, data collection and accuracy across DEA and its Ministries. This has led to improved supplier engagement and Sedex uptake.

	ACTIVITY	2024 Dominican Education Australia	2025 Dominican Education Australia
INTERNAL / STAFF	Hours spent on modern slavery activities	48	224
	Individual staff completed e-learning	10	0
	E-learning modules completed	10	0
	Total number of suppliers	3,553	3,559
EXTERNAL / SUPPLIER ENGAGEMENT	Number of suppliers with visible contact information and ABN	2,549	2,488
	Number of suppliers across high-risk categories	724	725
	Number of ACAN Supplier Surveys completed	497	792
	Supplier staff attending capacity building webinars and e-learning	28	34
	Invited to join Sedex	71	91
	Joined Sedex	67	77
	Sedex SAQ completed	38	54
	Social audits	10	9
	Corrective actions	52	36

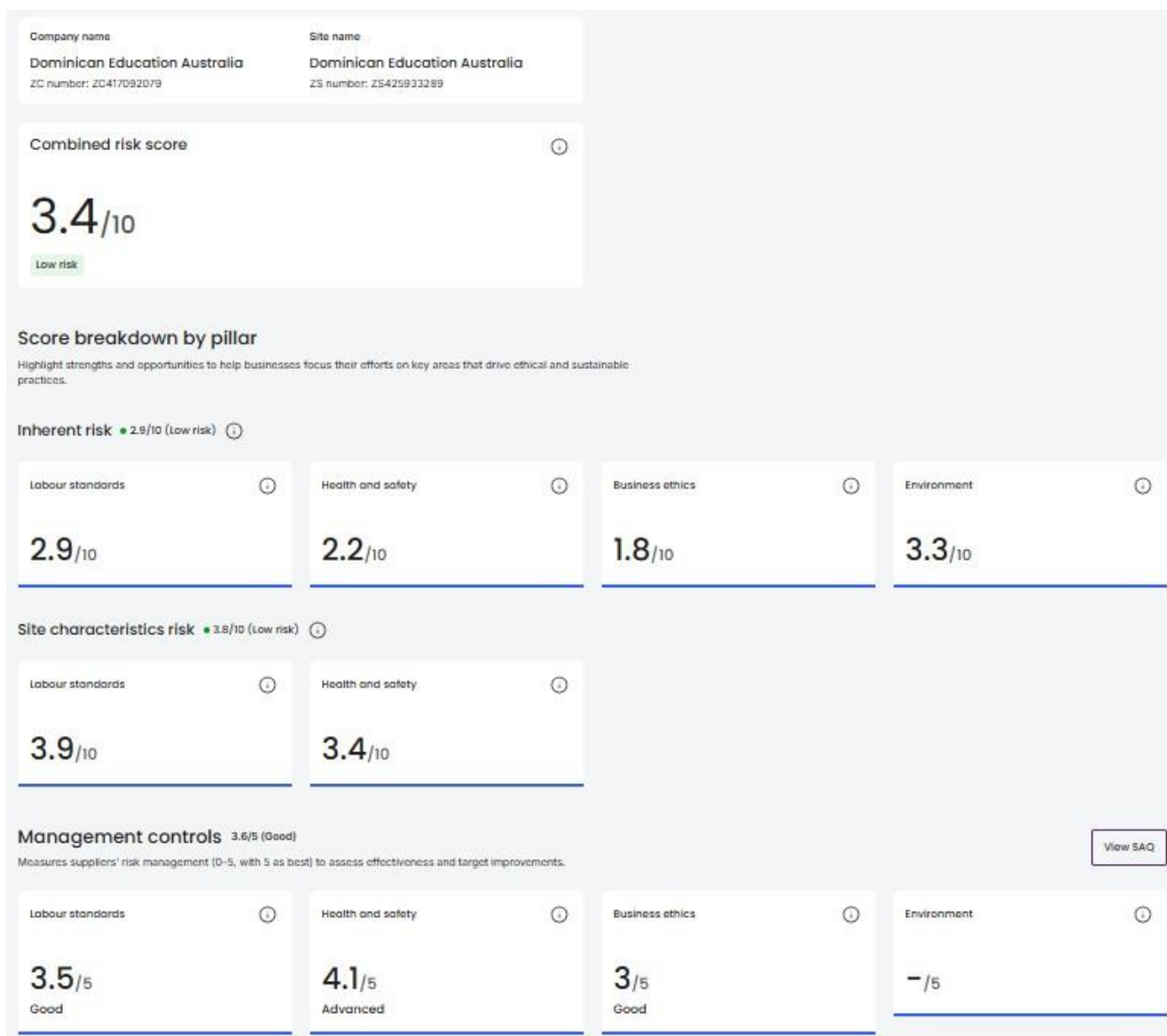
**DOMUS 8.7
EXTERNAL
REFERRALS**

Contacts made via worker voice / grievance mechanism	0	0
Referrals for advice and assistance	0	0
Individuals identified or referred for modern slavery assessment	0	0
Individuals with modern slavery cases remediated	0	0

In 2025, ACAN members adopted completion of the Sedex Self-Assessment Questionnaire (SAQ) to help members focus their efforts on key areas that drive ethical and sustainable practices. DEA completed the Sedex SAQ for the first time. This activity replaces ACAN's previous Maturity Assessment to align with a globally recognised standard. The results provide a roadmap to strengthen policies, address gaps and meet compliance standards across four pillars: labour standards, health and safety, business ethics, and the environment.

DEA's combined risk score is calculated from inherent risk and site characteristics, adjusted for management controls and any audit results. As a result of completing the Sedex SAQ, DEA's result is:

3.4/10, a low risk rating.



Reporting Criterion 6: Consultation with entities owned or controlled

The DEA Chief Executive Officer (CEO) leads our Modern Slavery Working Group. The Working Group is comprised of senior managers from each ministry who are tasked with actions to implement in relation to the development of this statement. The CEO met with our governed entities during the reporting period to consult with them about this statement.

Reporting Criterion 7: Other Information

No other relevant information





Modern Slavery Statement 2025

Acknowledgment of Country

We acknowledge the Aboriginal Peoples as the Traditional Owners of each of the Countries on which our schools, centres and offices are located.

We acknowledge the Torres Strait Islander Peoples who are the Traditional Owners of the Torres Strait Islands.

We are honoured to have the world's oldest living and surviving cultures.

We pay our respect to Ancestors, Elders and Leaders of the future who have the spiritual connectedness and relatedness to Country and all living systems.



The EREA Community – Robert Paul Designs

Robert Paul is of Juru descent, born in Bowen in 1963. His use of contemporary designs and colours, along with his interpretation of Traditional Indigenous Art, allows him to tell a story while educating the public about some of the symbolism used in Indigenous Art.

Disclosure Note

This Statement has been made on behalf of Edmund Rice Education Australia (EREA) ABN 96 372 268 340 and its governed entities, overseeing 60 schools and learning centres:

1. **Edmund Rice Education Australia BlendED National Ltd** ABN 35 688 755 133
2. **Edmund Rice Education Australia Colleges Ltd** ABN 71 659 944 831
3. **Edmund Rice Education Australia Flexible Schools Ltd** ABN 52 659 978 846
4. **Edmund Rice Education Australia New South Wales Colleges Ltd** ABN 60 661 601 118
5. **Edmund Rice Education Australia St Kevin's College Ltd** ABN 31 659 900 026
6. **Edmund Rice Education Australia Victorian Schools Ltd** ABN 90 659 880 985

EREA National office address: 74 Bridport Street, Albert Park VIC 3206

Website: www.erea.edu.au

Contact: info@erea.edu.au

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Reporting Period 1 January – 31 December 2025

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Foreword, Approval and Signature

Edmund Rice Education Australia (EREA) is committed to addressing modern slavery risks in our operations and supply chains. This commitment is deeply rooted in the enduring values taught by Blessed Edmund Rice, our founder, whose life's work was dedicated to uplifting the poor and marginalised.

As an educational community, we are uniquely positioned to foster awareness, encourage reflection, and inspire action among our students and stakeholders, forging pathways towards greater justice and equity in the wider world.

The issue of modern slavery demands a consistent and proactive approach. That is why we will continue to participate in the Australian Catholic Anti-slavery Network (ACAN) alongside other Catholic entities.

We acknowledge the impact that commercial activities - including ours - can have on vulnerable people through modern slavery practices. We have a responsibility to take practical action to manage risk in our operations and supply chains.

We will continue to engage and partner with suppliers who share our respect for human dignity, ethical business practices and humanitarian values. By doing so, we honour Blessed Edmund Rice and the Christian Brothers' tradition of working to empower disadvantaged and vulnerable people.

Signed



Dr Stephen Brown

Chair

Trustees of Edmund Rice Education Australia

This Modern Slavery Statement was approved by the principal governing body of Edmund Rice Education Australia as defined by the Modern Slavery Act 2018 (Cth) ("the Act") on 14 June 2026.

This modern slavery statement is signed by a responsible member of Edmund Rice Education Australia as defined by the Act.

"True peace begins with the recognition and protection of the God-given dignity of every person....."

Pope Leo XIV

CRITERION 1: About EREA

The formation of Edmund Rice Education Australia (EREA) by the Congregation of Christian Brothers continues their work in education that began in Australia 1872. The name represents the founder of the global Christian Brothers Congregation, Br Edmund Ignatius Rice. The governance, accountability and responsibility for all Christian Brothers owned and operated schools in Australia transferred to EREA on 1 October 2007. EREA is an incorporated body under the Roman Catholic Church Communities Lands Act 1942 (NSW).

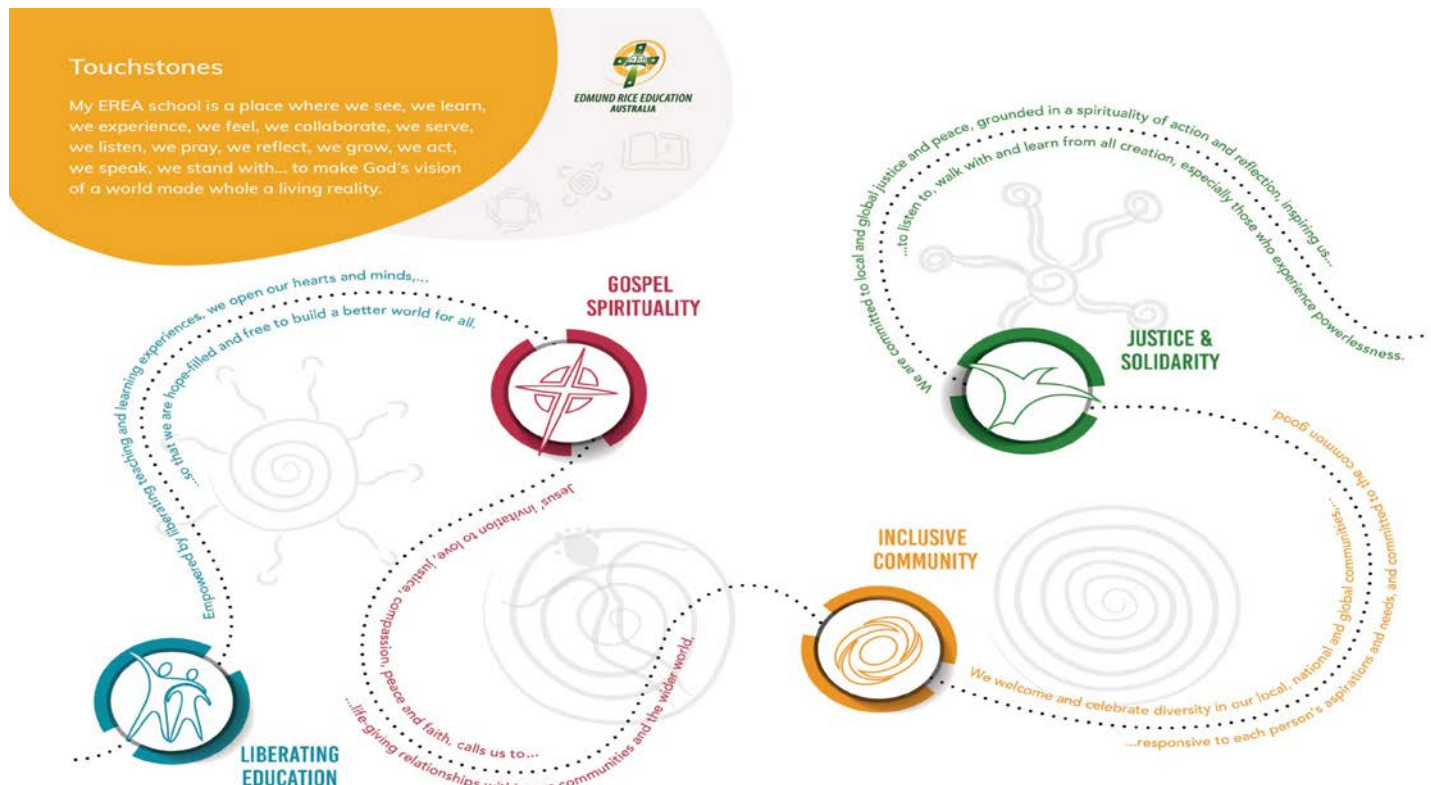
EREA, as part of the mission of the Catholic Church, was initially charged with the responsibility for the governance of Christian Brothers' schools throughout Australia. Today, 60 schools and centres operate to provide an education in the Edmund Rice tradition to young people across all states and territories. Each school and centre has a separate character and history but all draw life from the charism of Edmund Rice and the Gospel.

Our Charter

The Charter for Catholic Schools in the Edmund Rice tradition is the contemporary educational expression of the charism of Blessed Edmund Rice in Australia.

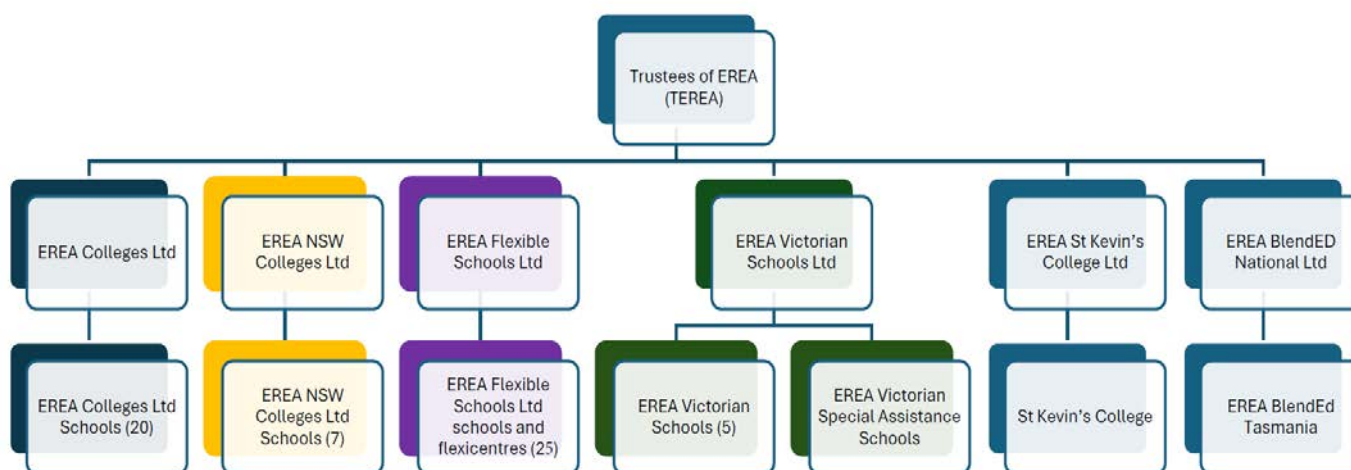
The EREA Charter is informed and enriched by the Scriptures, First Nations Knowings and Catholic Teaching. These three sources of wisdom, woven dynamically through our Charter, call us to both faithfulness and transformation. We are guided by the EREA Charter, with our Touchstones as the measure of our authenticity. Through a *liberating education*, based on a *Gospel spirituality*, within an *inclusive community*, committed to *justice and solidarity*, we co-create a better world for all.

In 2025, EREA had a total operational turnover of \$1,679M.



CRITERION 2: Our Structure, Operations, and Supply Chains

EREA Governance Structure



EREA was established to succeed, carry on and expand the education ministries conducted by the Congregation of Christian Brothers in Australia. The purpose of EREA is to own, govern, manage and conduct these ministries in fulfilment of the mission of Jesus Christ in the Catholic tradition and in continuation of the charism of Blessed Edmund Rice.

The Trustees of Edmund Rice Education Australia (TEREA) is the sole member of 6 entities established as the governing authorities and active overseers of EREA schools, namely:

1. **Edmund Rice Education Australia BlendED National Ltd** – established in 2025 with the first school to open in Tasmania in February 2026; second school will open in Queensland in July 2026
2. **Edmund Rice Education Australia Colleges Ltd** – 18 schools and 2 Early Learning Centres located in ACT, Queensland, South Australia, Tasmania and Western Australia
3. **Edmund Rice Education Australia Flexible Schools Ltd**– 25 Flexible Learning Schools and Centres located in NSW, Northern Territory, Queensland, South Australia, Tasmania and Western Australia, along with 2 special schools located in NSW
4. **Edmund Rice Education Australia New South Wales Colleges Ltd** – 7 schools located in NSW
5. **Edmund Rice Education Australia St Kevin's College Ltd** – located in Victoria
6. **Edmund Rice Education Australia Victorian Schools Ltd** – 6 schools located in Victoria (including St Joseph's Special Assistance Schools formerly part of the Flexi Schools network)

EREA Council

The members of the Council of EREA comprise the governing body of EREA under canon law and they are also the members of the body corporate known as Trustees of Edmund Rice Education Australia under civil law. The members of the EREA Council are appointed by the Congregation Leader of the Christian Brothers. The EREA Council appoints the Trustees of EREA and delegates to it certain responsibilities related to the management and strategic direction of EREA.

The EREA Council (as canonical stewards):

- ensures the Identity of EREA as Catholic and an expression of the charism of Blessed Edmund Rice
- relates on behalf of EREA to Church authorities, and

- approves the establishment or termination of an apostolic work of EREA.

The EREA Council (as civil stewards):

- reviews and approves the acquisition or alienation of the resources of EREA (according to the Constitution).

The Trustees of EREA:

- sets the strategic directions for EREA
- oversees the financial wellbeing of EREA
- oversees the management of EREA
- contributes to the nurturing of key external relationships
- provides opportunities for formation in the mission of the Catholic Church and the charism of Edmund Rice.

The EREA Governing Body Boards:

- govern the operation of their schools
- set the operational policy framework
- oversee the financial wellbeing of their schools
- oversee the management of its relevant Governing body
- contribute to the nurturing of key external relationship
- support and guide the Governing Body Executive
- delegate the day-to-day operation and management of the entity's schools to the Executive and Principals and certain other responsibilities to School Advisory Councils.

The EREA National Executive Director

- implements the strategy and policy approved by the Trustees of EREA
- articulates the Vision and Mission of EREA and provides leadership which empowers others to bring the EREA Charter to life
- appoints staff to fulfil the leadership, management and operational structures of EREA
- ensures the provision of appropriate faith formation and spiritual development of all staff
- ensures the sustainability, growth and development of EREA while complying with statutory obligations

Operations and Workforce Profile

As at August 2025 Government census, over 6,900 staff were employed across EREA operations. While some schools employ staff in Operational areas, such as canteens, catering, property maintenance and uniforms, in many schools, these service operations are outsourced to contractor services where employees are not directly employed by an EREA entity or school. EREA schools have also engaged with over 1,600 volunteers in supporting young people's learning .

Supply Chains

As an education provider, the majority of expenditure relates to teaching and support staff, with employment costs representing 66.5% of total recurrent expenditure. Across the group, non-staffing expenditure in 2025 was \$441M with \$167M spend on capital expenditure.

With 60 Schools and learning centres across all states and territories in Australia, our supply chains are very diverse. In total, EREA offices and schools sourced goods and services from over 12,000 providers, with goods ultimately sourced from a number of different nations.

Our Schools

EREA COLLEGES LTD

Ambrose Treacy College

St Edmund's College Ipswich

Aquinas College

St James College

CBC Adelaide

St Joseph's College Gregory Terrace

CBC Fremantle

St Joseph's Nudgee College

Ignatius Park College

St Laurence's College

Indooroopilly Montessori
Children's House

St Patrick's College
Shorncliffe

Mary Rice ELC

St Paul's College

Rostrevor College

St Theresa's College

St Brendan's College

St Virgil's College

St Edmund's College Canberra

Trinity College

EREA ST KEVIN'S COLLEGE LTD

St Kevin's College

EREA BLENDED NATIONAL LTD

BlendED Tasmania

EREA NSW COLLEGES LTD

Christian Brothers High
School Lewisham

Edmund Rice College Wollongong

St Dominic's College

St Edward's College

St Patrick's College Strathfield

St Pius X College

Waverley College

EREA VICTORIAN SCHOOLS LTD

Parade College

St Bernard's College

St Joseph's College Geelong

St Mary's College

St Patrick's College Ballarat

Saints College

EREA FLEXIBLE SCHOOLS LTD

FAME (SA)

Deception Bay
Flexi School (QLD)

Edmund Rice Flexi School
(SA)

Gympie Flexi School (QLD)

Geraldton Flexi School (WA)

Hemmant Flexi School (QLD)

St Joseph's Catholic
Flexi School (NT)

Noosa Flexi School (QLD)

St Francis Flexi School (TAS)

Albert Park Flexi School (QLD)

Mt Isa Flexi School (QLD)

St Mary's Flexi School (NSW)

Rockhampton Flexi
School (QLD)

Wollongong Flexi School
(NSW)

Southport Flexi School (QLD)

St Laurence Flexi School (NSW)

The Centre Education (QLD)

Pambula Beach Flexi
School (NSW)

Inala Flexi School (QLD)

St Edmund's Wahroonga (NSW)

Ipswich Flexi School (QLD)

St Gabriel's School (NSW)

Townsville Flexi School (QLD)

Bowen Flexi School (QLD)

Burdekin Education
Programme (QLD)

Governance of Modern Slavery Risks - Roles and Responsibilities

Role	Responsibilities
Trustees of EREA	• Approve our Modern Slavery Policy and annual statement • Ensure our policy is reviewed and updated as needed • Review compliance with our policy • Ensure our policy and its implementation complies with relevant Catholic social teachings, and legal and ethical obligations.
EREA National Executive Director and Governing Body CEOs	• Develop procedures and guidelines supporting adherence with our policy • Monitor Modern Slavery Policy implementation
Modern Slavery Liaison Officer (MSLO)	• Attend ACAN monthly webinars • Deploy ACAN Modern Slavery Risk Management Program resources • Coordinate modern slavery actions and reporting across EREA
Modern Slavery Working Party (MSWG) Chaired by MSLO with membership comprising representation from each governing body in varying roles of Spirituality and Education, Risk & Compliance, Governance and Finance	• Providing a forum to facilitate information flow across EREA entity operations and supply chains; • Coordinating efforts to assess and address modern slavery risks across EREA entity operations and supply chain; • Together, with the Modern Slavery Liaison Officer (MSLO), ensuring EREA'S participation in ACAN; • Modifying (where required) and distributing modern slavery tools, resources and training to relevant personnel within EREA entities; • Providing feedback and advice on policies, programs and other initiatives aimed at addressing modern slavery within EREA entity operations and supply chains; • Fostering collaboration across EREA entities regarding modern slavery risk management approaches; • Supporting the development and implementation of a supplier engagement strategy; • Assisting with preparation of EREA'S Modern Slavery Statement to be submitted as part of the ACAN Compendium of Modern Slavery Statements.
School Principals and Business Managers	• Implement Modern Slavery Policy, associated procedures and guidelines

CRITERION 3: Modern Slavery Risks

For Catholic organisations, modern slavery risks are defined by the ACAN Category Risk Taxonomy, a classification standard that identifies severity of actual or potential harm to people (saliency) in spend categories.

The ACAN Category Risk Taxonomy is based on sources such as:

- the Global Slavery Index
- the International Labor Organisation (ILO), including definitions of modern slavery
- the Bureau of International Labor Affairs (ILAB), U.S Department of Labor
- the Global Child Forum and UNICEF

Four key factors are also used to determine the level of risk:

- Geography: the country or location where a good is made or service is delivered
- Industry: the sector in which the making of goods or delivery of service occurred
- Commodity: the raw materials or components that comprise the goods or products
- Workforce vulnerability: such as bonded visas, temporary migrants, women or children known to be employed in specific industry sectors
 - Domus 8.7: trends, cases, and risk intelligence identified through the Domus 8.7 remediation service, including grievances and remediation insights relevant to category and risk to workers.

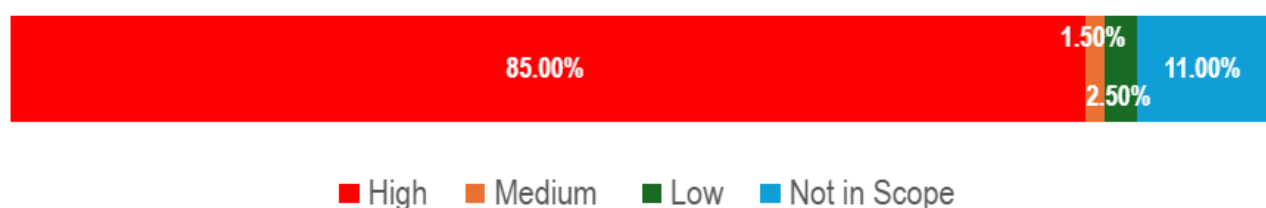
Classification*

High Risk	Medium Risk	Low Risk
• Building and construction • Cleaning and Security • Events and event management • Facility management and property maintenance • Finance and Investment • Food and catering services • Furniture and office supplies • ICT Hardware • ICT Software and network services - offshore • Labour Hire • Linen, laundry and textile products • Medical devices and supplies • Transport, logistic and warehousing • Uniforms and PPE • Waste management services	• Advertising & Marketing • ICT Software and network services - onshore • Utilities • Fleet management, consumables and maintenance • Travel and accommodation • Print / Mail Provider	• Professional services • Financial expenses • Government and agency fees • License / membership fees

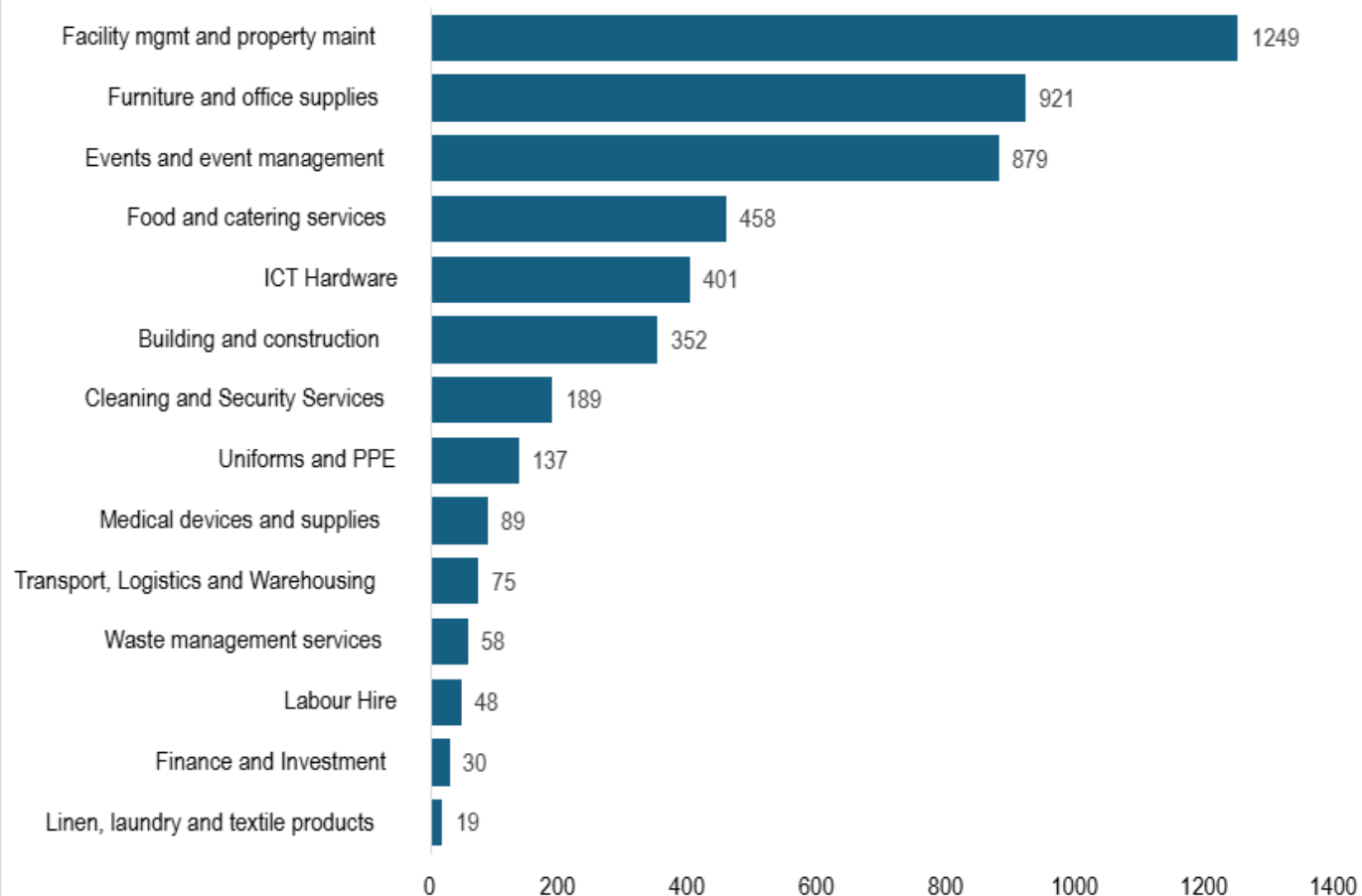
*Pastoral and Payroll categories (excluding labour-hire and sub-contracting) are not in scope

In the 2025 reporting period the EREA Group identified a range of procured products and services with diverse profiles from all schools and entities to assess the level of risk. 7,851 distinct suppliers with approximately \$315M of spend were assessed against the ACAN Category Risk Taxonomy. Through this process we have identified \$265M approx. was spent with suppliers which were categorised as high-risk. These categories include food and catering services, building construction, facilities management, ICT software, supplies & services, clothing suppliers and food services.

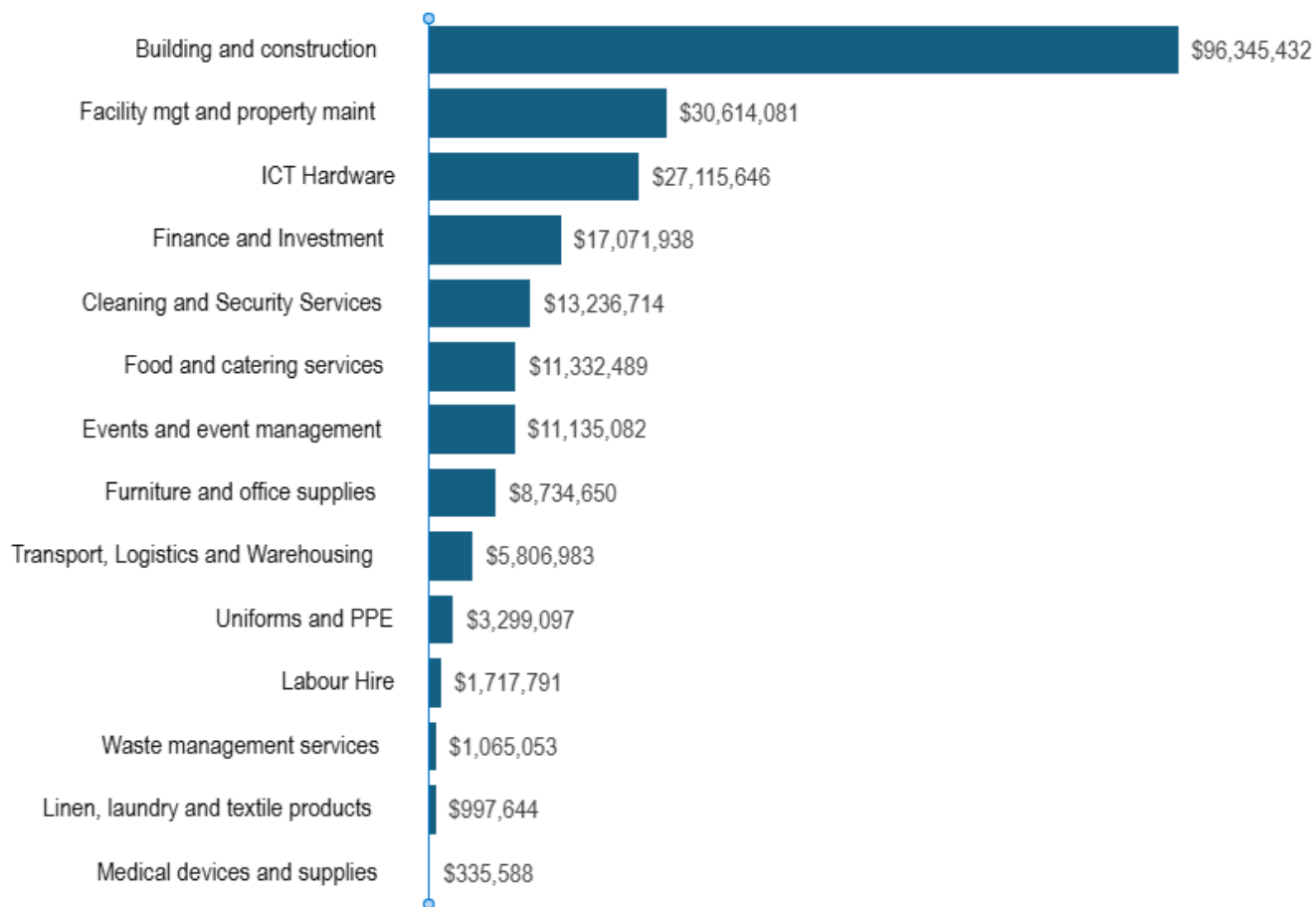
Percentage of Spend per Taxonomy Category



Number of Suppliers in High Risk Procurement Categories



Procurement Spend in High Risk Procurement Categories



Risks to People in Labour Hire

For schools, risks to people in labour hire are heightened because labour hire workers are often embedded in low-visibility, after-hours or outsourced functions where oversight is limited and reporting pathways are unclear. In Australia, people employed via labour hire contractors are particularly vulnerable to labour exploitation such as wage theft, underpayments, cash back schemes, unfair deductions, and more serious forms of modern slavery such as deceptive recruitment, debt bondage or forced labour. For some migrant workers, their visa status is tied to their employer, creating a relationship of dependency that can be exploited. Workers might endure poor working conditions because they fear that complaining could lead to job loss and affect their visa status.

Labour hire arrangements often involve temporary or casual positions which lack the security and benefits of permanent jobs. This precariousness can make workers hesitant to complain or stand up for their rights for fear of losing their jobs. Many workers, especially migrants or temporary visa holders, may not be fully aware of their rights or the legal standards in Australia. This lack of awareness can be exploited by employers to deny proper wages and working conditions. Unauthorised subcontracting may also add another layer of vulnerability for workers. Labour hire risks are most relevant for EREA in building and construction, facility management and property maintenance, events and catering, cleaning, security and waste management.

Risks to People Through Our Investments

Investments can directly or indirectly fund companies and projects that utilise forced labour or benefit from modern slavery. This can occur through investments in industries at high-risk of labour rights abuses, such as certain agricultural sectors, mining, construction, and manufacturing. Investors may unknowingly contribute financial resources that enable these companies to continue their exploitative practices. EREA has significant investments that are managed through various Catholic Diocesan Development Funds.

CRITERION 4: Actions to address Modern Slavery Risks

In 2025 EREA's modern slavery risk management program increased actions to obtain more comprehensive and accurate supplier data through the Working Party members and Modern Slavery Liaison Officer (MSLO). This has enhanced supplier spend and data analysis and supplier engagement by ACAN to address our supply chain risk through SEDEX - Supplier Ethical Data Exchange.

The following steps were taken to engage suppliers:

ACAN Supplier Engagement

The ACAN Program provides supplier engagement support and data, enabling a systematic and comprehensive supply chain risk assessment. In 2025 the ACAN Modern Slavery Risk Management Program launched a new purpose-built data management platform - ROTA. ROTA centralises the ACAN Risk Management Program framework and facilitates supplier performance, evaluation and engagement through:

1. Evaluation of modern slavery risks within operations and supply chains, using the ACAN Risk Taxonomy
2. ACAN Supplier Survey to identify supplier revenue, number of employees, countries of origin for goods sourced overseas, workforce contractual arrangements and Sedex membership status
3. Supplier education on modern slavery and risk management in key areas: cleaning, building and construction, procurement of labour, labour hire and services, sourcing goods from overseas, grievance mechanisms and remediation
4. Onboarding suppliers to Sedex platform requiring a business address, contact details and goods or services provided
5. Sedex Self-Assessment Questionnaire (SAQ) completion to help suppliers to evaluate their practices against established standards and identify areas for improvement
6. Desktop review to identify key actions required from suppliers
7. Enhance supplier screening using Know Your Client (KYC) intelligence software
8. Corporate Social Compliance Audits to provide a point in time, objective and independent verification process of supplier alignment with local laws and worker wellbeing standards
9. Domus 8.7 Index modern slavery statement assessment on selected suppliers in high-risk categories
10. ACAN Prequalified Supplier Directory - a list of preferred suppliers accessible to Catholic organisations

Supplier Engagement Overview

ACAN Entity File

ENTR-19 | Edmund Rice Education Australia

Total suppliers

12,357

Suppliers in High Risk procurement categories

7,917

ACAN Supplier Surveys completed

2800

ACAN Supplier Surveys completed in 2026

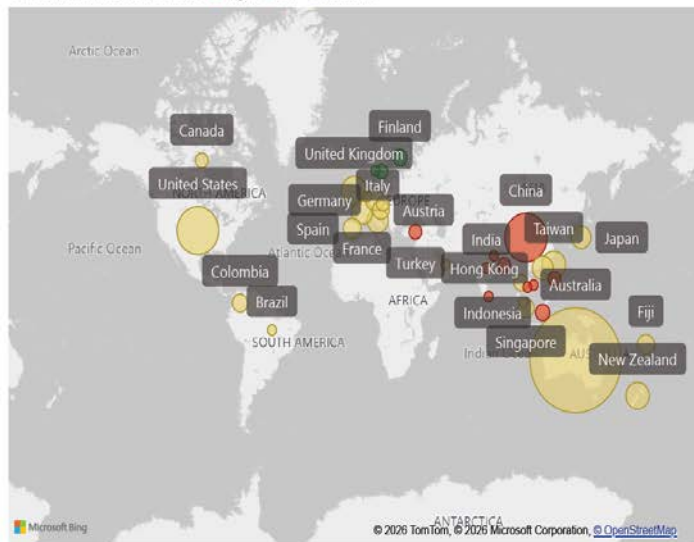
149

Suppliers identified for Sedex Onboarding

175

Sourcing Countries for Tier 1 Suppliers

Overall inherent risk cate... ● high ● low ● medium



Supplier e-mail shared

9956

Supplier Communication

22020

Suppliers completing e-learning

49

Supplier Screening - ACAN Collated

Enhanced 3rd Party Supplier Screening

529

3rd Party Supplier Screening - High and Medium Risk

25

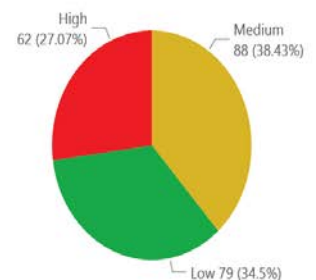
Suppliers on Sedex

173

SAQs Completed

188

Sedex SAQ Risk Category



Audits in 2025

19

Audits Findings in 2025

137

Actions related to risks to people in labour hire on our sites

Internal reporting of actual or potential modern slavery risks by staff is expected. Staff shall immediately report any suspected violations of the Policy or other illegal or unethical conduct to their line manager for escalation through to their Principal and/or Governing Executive and EREA through Assurance. Information is confidential and there shall be no retribution or retaliation for reports made in good faith.

Suppliers are also required to report suspected or actual modern slavery practices, indicators or red flags immediately without fear of retribution, retaliation or loss of business with us. EREA commits to working with our suppliers to address issues, ensure effective remedy and implement prevention measures. If a supplier or any other person outside EREA provides information to a staff member about suspected or actual modern slavery practices, indicators or red flags within our organisation or supply chain, the information must be immediately passed onto their line manager for escalation through to their Principal and EREA.

Actions related to our investments

In line with Catholic Social Teaching EREA prioritises investments in companies that uphold human rights, social justice and environmental stewardship. Our investments are managed by Catholic Diocesan Development Funds, whose work is grounded in these principles and contributes to positive social impact across Catholic communities by supporting various religious and charitable activities.

Grievance and Remediation

EREA is committed to ensuring appropriate and timely remedy to people impacted by modern slavery, in accordance with the United Nations Guiding Principles on Business and Human Rights, Commonwealth Modern Slavery Act 2018 – Guidance for Reporting Entities and relevant Australian laws. This includes providing for, or cooperating in, actions to address harms to people and root causes to mitigate future risks if EREA is found to have caused or contributed to modern slavery.

EREA's [Whistleblower Policy](#) and YourCall service is accessible to staff, service providers and contractors.

EREA's Whistleblower Protection Policy and accompanying Guidelines are available to all current or former:

- EREA Council and Trustees of EREA
- EREA National Executive Director
- EREA National Directors, Stewardship and Mission Team staff members
- Governing Body Board Members
- Governing Body CEOs and Entity Office staff members
- Principals, Deputy Principals & Business Managers
- Permanent, part-time and casual staff (teaching and non-teaching)
- Volunteers
- Contractors
- Suppliers

As an ACAN participating entity, EREA is a founding partner of Domus 8.7, an independent agency of the Archdiocese of Sydney providing a remedy pathway and support to people impacted by modern slavery.

Where EREA is directly linked to modern slavery by a business relationship, we are committed to working with the entity which caused the harm, to ensure remediation and mitigation of its recurrence. Remediation obligations and expectations are included in contracts with high-risk suppliers who must notify and consult with EREA to ensure victim-centered remediation processes are implemented to the satisfaction of EREA.

When suspicions or indicators of modern slavery come to our attention through whistle-blower or other channels, staff will contact relevant law enforcement agencies and/or Domus 8.7 for an assessment, investigation, action planning and implementation of a remediation process. Domus 8.7 provides EREA with:

- resources that enable us to listen to workers (grievance channel)
- a 24/7 careline for workers on our sites, staffed by professional counsellors
- direct support to people impacted by modern slavery
- guidance and technical assistance to prevent, identify and remediate modern slavery
- a documented process to assess if an organisation has caused, contributed or is directly linked to modern slavery and modern slavery indicators

Domus 8.7 empowers people impacted by modern slavery to have choice and control over what forms of remediation are meaningful to them and to engage safely with business/supply chain actors. Supports may include:

- modern slavery indicator assessment
- needs assessment, case coordination, response and remediation planning
- referrals to community, social services, unions
- transport, accommodation, financial and food support
- legal support, referrals, accompaniment and advocacy
- job training, retraining and redeployment
- accompaniment and advocacy to engage with government and law enforcement agencies
- opportunities to contribute lived expertise to improve modern slavery responses

The Domus 8.7 Advisory Committee Members also include a person with lived expertise, Mr Moe Turaga. Domus 8.7 is a registered charity with the Australian Charities and Not-for profits Commission (ACNC) and is an endorsed Public Benevolent Institution with Deductible Gift Recipient (DGR) status.

“Ultimately, the violence of human trafficking can be overcome only through a renewed vision that beholds every individual as beloved child of God.....”

Pope Leo XIV

CRITERION 5: How we assess the effectiveness of our actions

In 2025, ACAN members adopted completion of the Sedex Self-Assessment Questionnaire (SAQ) to help members focus their efforts on key areas that drive ethical and sustainable practices. EREA completed the Sedex for the first time. This activity replaces ACAN's previous Maturity Assessment to align with a globally recognised standard. The results provide a roadmap to strengthen policies, address gaps and meet compliance standards across four pillars: labour standards, health and safety, business ethics, and the environment.

EREA's combined risk score is calculated from inherent risk and site characteristics, adjusted for management controls and any audit results. As a result of completing the Sedex SAQ, EREA's result is:

4.8/10, a medium risk rating.

Inherent risk ● 2.9/10 (Low risk) ⓘ

Labour standards ⓘ	Health and safety ⓘ	Business ethics ⓘ	Environment ⓘ
2.9/10	2.2/10	1.8/10	3.3/10

Site characteristics risk ● 6.6/10 (High risk) ⓘ

Labour standards ⓘ	Health and safety ⓘ
7.1/10	5.4/10

Management controls 2.7/5 (Moderate)

Measures suppliers' risk management (0-5, with 5 as best) to assess effectiveness and target improvements.

[View SAQ](#)

Labour standards ⓘ	Health and safety ⓘ	Business ethics ⓘ	Environment ⓘ
2.3/5 Moderate	3.8/5 Good	3.5/5 Good	0/5 Poor

Continuous Improvement

Through 2025, EREA undertook to update its profile to confirm the effectiveness of actions taken to address Modern Slavery, as assessed by ACAN. The baseline data table below reflects metrics for the EREA Group, indicating improvements from 2023 through 2025. These key metrics provide a quantitative basis to evaluate actions and results, providing an objective measure of achievements.

The analysis reflects the significant increase in engagement by working group members and staff across the organisation to take risk management actions. This includes significantly more staff completing e-learning and improved supplier data collection which has led to improved supplier engagement opportunities.

The number of suppliers completing the ACAN supplier survey and completing the Sedex SAQ has increased. Visibility of self-reported information and modern slavery risks associated with individual suppliers improved with an increase in activity by suppliers for all metrics assessed.

	ACTIVITY	2023 Edmund Rice Education Australia	2024 Edmund Rice Education Australia	2025 Edmund Rice Education Australia
INTERNAL / STAFF	Hours spent on modern slavery activities	30	32	162
	Individual staff completed e-learning	-	15	454
	E-learning modules completed	-	20	454
EXTERNAL / SUPPLIER ENGAGEMENT	Total number of suppliers	2,665	9,021	12,131
	Number of suppliers with visible contact information and ABN	2,665	6,570	9,907
	Number of suppliers across high-risk categories	789	3,004	7,917
	Number of ACAN Supplier Surveys completed	246	678	2,751
	Supplier staff attending capacity building webinars	16	48	49
	Invited to join Sedex		89	172
	Joined Sedex	58	94	167
	Sedex SAQ completed	2	30	185
	Social audits	0	9	19
	Corrective actions	0	25	137
DOMUS 8.7 EXTERNAL REFERRALS	Contacts made via worker voice / grievance mechanism	0	31	0
	Referrals for advice and assistance	0	0	0
	Individuals identified or referred for modern slavery assessment	0	0	0
	Individuals with modern slavery cases remediated	0	0	0

CRITERION 6: Consultation with controlled entities

EREA ensures that anti-slavery policies and practices are integrated and effectively implemented across all levels of our controlled entities. During the reporting period the Modern Slavery Working Group (MSWG) included representation from all governing bodies as well as schools to ensure diversity of membership, contributions by members and consultation in the preparation of this statement. The MSWG meets each quarter has commenced development of the Modern Slavery Action Plan 2026 – 2029.

CRITERION 7: Other relevant information

No other relevant information.



**MacKillop
Family
Services**



Modern Slavery Statement 2025

1 January 2025 – 31 December 2025

mackillop.org.au

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Introduction, Approval and Signature

This is the sixth Modern Slavery Statement (“Statement”) submitted by MacKillop Family Services Limited (“MacKillop”) pursuant to the Commonwealth *Modern Slavery Act 2018* (the “Act”).

Modern slavery is defined by the Act as: slavery, servitude, human trafficking, forced marriage, forced labour, debt bondage, child labour, and deceptive recruiting for labour or services (“modern slavery”).

At MacKillop, we are deeply committed to working for the rights of children, young people and families to promote healing from trauma and loss, and to enable hopeful futures. Given the vulnerable groups we work with, we are also often on the front lines with children, young people and families who are most at risk of being victims of modern slavery. The factors that contribute to good outcomes for the communities are varied and operate at multiple layers of an organisation, community and society. We remain committed to identify and address our impact through our work as outlined in this Statement and in our Sustainability Strategy. The Act and its objectives are consistent with our organisational Purpose, Vision and Values.

This is a joint Statement made with a range of Australian Catholic organisations that are participating in the Australian Catholic Anti-Slavery Network (“ACAN”). It forms part of ACAN’s 2025 Compendium of Modern Slavery Statements.

This Statement relates to the period 1 January 2025 to 31 December 2025 (“Reporting Period”).

This Statement was approved by the principal governing body of MacKillop on 19 June 2026 and is signed by a responsible member of MacKillop as defined by the Act.

Charles Reis
Chair of the Board
MacKillop Family Services

Criteria 1: About MacKillop Family Services

Today, MacKillop Family Services continues the work of our founding congregations within the framework of Catholic Social Teaching and in the spirit of the Gospel - one of radical inclusion, restoration and accompaniment. Just like our founders, we are deeply committed to our work and are driven by social justice. Every child should be protected from abuse, neglect and exploitation, and as a child-safe organisation, we are committed to protecting and advocating for the best interests of the children and families we support.

MacKillop is a national charitable organisation and a leading provider of services for children, young people and their families. Services and programs are offered in family support, foster care, residential care, disability services, youth support, education and training, parenting, family therapy, mental health, family violence, early childhood, and support to women and men who, as children, were in the care of MacKillop's founding agencies.

We also operate four specialist schools in Victoria and one specialist school in New South Wales.

For more information on MacKillop and our services, visit www.mackillop.org.au.



Our Founding Story

On 1 July 1997, MacKillop was formed as a new organisation by re-founding seven agencies operated by the Sisters of Mercy, the Christian Brothers and the Sisters of Saint Joseph of the Sacred Heart in Victoria. However, our legacy and inspiration are much older. From the 1850s, these three congregations - respectively founded by Catherine McAuley, Edmund Rice and Mary MacKillop - worked in Victoria to establish homes for children who were orphaned, destitute or neglected, and for families who were in need of care and support. Throughout the years, the original model of institutional care evolved into different forms of residential care, foster care, education, family support and disability services.

The purpose and character of MacKillop as a Catholic organisation continues to draw from the lives, works and inspiration of our three founders, who provide a living model for the way our staff and volunteers approach their work. Woven through this ethos is the acknowledgement and recognition of the inherent Aboriginal spirituality of this country and respect for the cultures of the peoples who have lived here for thousands of generations.

Our Purpose

Like our founders, MacKillop's work is underpinned by a passionate commitment to social justice - to work for the rights of children, young people and families to be safe, to learn, feel nurtured and connected to culture. We provide high quality services to promote healing from trauma and loss, and to enable hopeful futures.

MacKillop will care compassionately, respond large-heartedly and advocate courageously.

Our Vision

Children, young people and families are welcomed and supported by MacKillop to be empowered and thrive.

Our Values

We commit to the following five foundational values which we continue to embed in the culture of our organisation and practice:



Justice

We believe in the right of all people to experience respect and to have access to quality services irrespective of sex, race, ethnicity, culture, language, religion, marital status, disability, sexuality or age. We advocate for inclusiveness and social justice in the wider community and commit to these principles across our organisation and all services we provide.



Hope

We commit to creating positive and hopeful relationships where people find meaning in their experiences and relationships and are able to learn, explore their strengths and create possibilities for growth and change.



Collaboration

In our work with individuals, families and other organisations and groups, we commit to working in a collaborative spirit through cooperation, coordination, partnership and empowerment.



Compassion

Compassion is an attitude of the heart, an expression of our shared humanity and a deep desire to alleviate another's suffering. We commit to creating an attitude of openness to others and to their circumstances.



Respect

We value ourselves and other people, the earth and all creation. We seek to listen and learn from each other and build relationships with respect, being proud of what we hold in common and with understanding and tolerance of our differences.

Sanctuary Commitments

MacKillop's values are brought to life through our commitment to the Sanctuary Model. Sanctuary is an evidence-supported, whole-of-organisation framework that guides how we practice as an agency. Sanctuary enables a shared language, knowledge, and response to the impact of trauma and loss on all of us.



Non-Violence

Mean what you say
and don't be mean
when you say it



Democracy

Everyone is heard



Growth and Change

Open to new ideas and ways
of thinking



Emotional Intelligence

Look out for yours and
other people's feelings



Open Communication

Be honest and share
information



Cultural Humility

We practice compassionate
self-reflection and self-
critique in order to cultivate
safety for all



Social Learning

We all learn from, and
teach each other



Social Responsibility

We all help each other...
It takes a village to raise
a child

Strategic Goals

1. Grow high quality, inclusive services to prevent harm, to support healing and to respond where the need is great.
2. Be an innovative and responsive leader by developing best practices and advocating for social justice.
3. Deepen our commitment to Aboriginal self-determination, reconciliation and cultural safety.
4. Ensure accountable and integrated systems that prioritise the safety and wellbeing of children, families, volunteers and staff.
5. Strengthen organisational and financial sustainability.



Sustainability at MacKillop Family Services

MacKillop is committed to sustainability and views itself as a custodian of the future of the children, young people, and families it works with. We aim to operate in a way that meets the current needs of our stakeholders while also securing a future where they can thrive. Our Sustainability Strategy 2023-2027 ("Sustainability Strategy"), outlines our commitment to making a positive impact including efforts aligned with SDG 8 regarding decent work and SDG Target 8.7 aimed at eliminating forced and child labour.

Our Sustainability Strategy provides the blueprint for implementing actions in the below four focus areas. A copy of our Sustainability Strategy can be found at www.mackillop.org.au/sustainability.

The end of financial year 2025 marked the second year of MacKillop's Sustainability Strategy. Below we highlight key initiatives accomplished within each Focus Area achieved in the year 2025.

Focus Area: Deepening our commitment to Aboriginal self-determination, reconciliation, and cultural safety



Stretch Reconciliation Action Plan (RAP)

In 2025 we launched our new Stretch Reconciliation Action Plan (RAP), marking a significant milestone in our organisation's reconciliation journey and our ongoing commitment to advancing meaningful, measurable outcomes for Aboriginal and Torres Strait Islander peoples.

The delivery of our Stretch RAP will be supported through key outcomes and commitments in the areas of Relationships, Respect, Opportunities and Governance.

Focus Area: Nurturing a diverse, inclusive, and culturally safe organisation



Cultural Mentoring Program

MacKillop and the Centre for Multicultural Youth (CMY) developed a framework to support multicultural children, young people, and families at risk of or already in Out of Home Care (OOHC), aiming for best practices with multicultural communities.

The Cultural Mentoring Program enhanced cultural responsiveness in residential care, improved support for multicultural youth and families, and increased staff capability by using internal expertise.

Focus Area: Acting on climate change and reducing our footprint



Waste Management Plan

A waste management plan was maintained to assess and monitor waste streams throughout our operations. The plan continues to be developed with a focus on managing and reducing waste, minimising landfill disposal, lowering our environmental impact, and enhancing both recycling and resource recovery efforts.

Carbon Emissions Reporting

MacKillop has implemented a carbon emissions reporting solution designed to strengthen the organisation's ability to accurately measure, manage, and report greenhouse gas emissions throughout its operations. Additionally, this system enables the identification of potential emissions reduction initiatives and supports the development of an emissions reduction plan.

Focus Area: Building sustainability into our procurement and financial management



Social and Environmental Procurement Strategy

MacKillop has developed and implemented the first stages of its Social Procurement Strategy. The focus of the first stage has been in Supplier Diversity and providing opportunities for Aboriginal and Torres Strait Islander owned businesses.

A First Nations Procurement Strategy and procedure have been further developed with the aim of increasing economic opportunities for Aboriginal and Torres Strait Islander businesses. The strategy is designed to:

- Stimulate First Nations entrepreneurship and business development.
- Increase the participation of First Nations businesses in the Australian economy.
- Support economic empowerment and self-determination.
- Contribute to Closing the Gap (Outcome 8).

Criteria 2: MacKillop Family Services Structure, Operations and Supply Chains

Organisational Structure

MacKillop Family Services Limited is a registered company limited by guarantee, incorporated and domiciled in Australia under the *Corporations Act 2001* (Cth). It is also a registered charity regulated by the Australian Charities and Not-for-profits Commission. It operates under the name MacKillop Family Services.

For the Financial Year ended June 2025, MacKillop had an annual revenue of \$317,638,880.

On 3 December 2021, MacKillop's members transitioned from its founding congregations to a Ministerial Public Juridic Person (PJP) called Mercy Ministry Companions which is also incorporated as a public company limited by guarantee and is the sole member of Mercy Community Services Australia Ltd ("MCSAL"). MCSAL is the sole member of MacKillop. The change in governance does not affect our status as a separate legal entity. Our Board of Directors is comprised of ten Directors, who volunteer their time and experience.

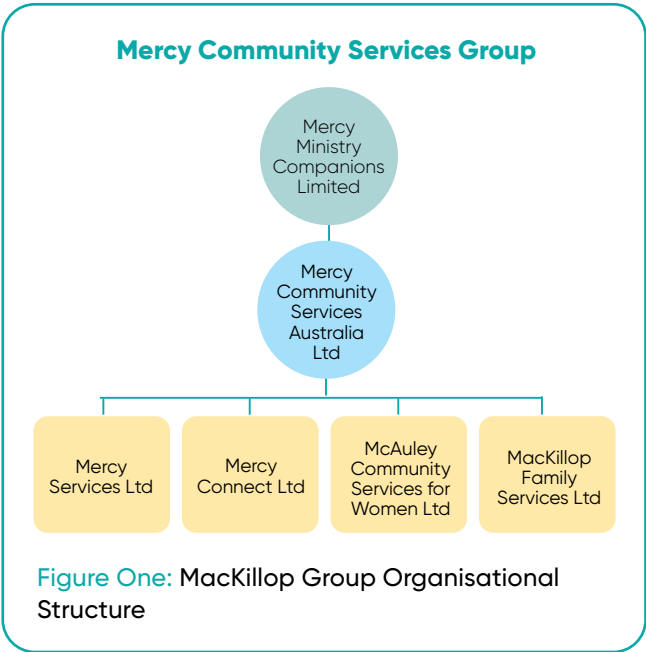
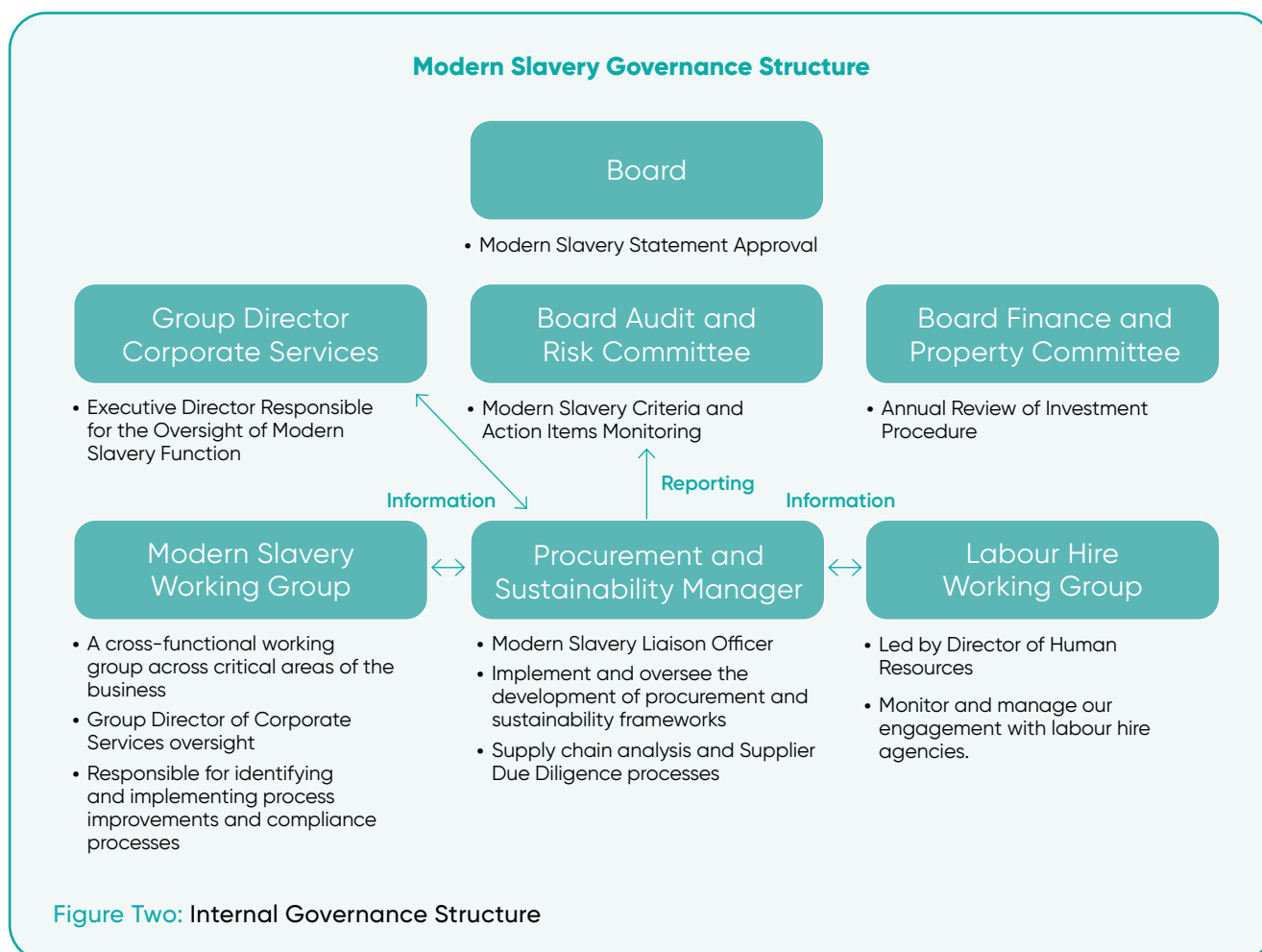


Figure One: MacKillop Group Organisational Structure



Governance Structure and Modern Slavery Framework

MacKillop has established the following governance framework to manage Modern Slavery risks.



Modern Slavery Working Group ("MSWG"):

Executive Responsible: Group Director of Corporate Services.

Chair: Procurement and Sustainability Manager.

Purpose: A cross-functional working group responsible for identifying and implementing process improvements and compliance processes.

Attend: General Manager of Finance, Manager of Risk and Compliance, Chief Information Officer, Manager of Fleet, Senior Lawyer, General Manager of Property and Fleet, Director of Human Resources, Director of Community Engagement, Director of Ethos and Culture, National Director Nanyubak Unit, Director - MacKillop Education

Optional: Operational Directors for each of our States and Territories.

Frequency: quarterly.

Labour Hire Working Group:

Executive Responsible and Chair: Director of Human Resources.

Purpose: This group monitors and manages our relationships with labour hire agencies and recruitment agencies. It manages and monitors our compliance obligations (including labour hire licences) in relation to those agencies, their staff and work health and safety issues. The group is responsible for MacKillop's "approved labour hire agency supplier list" and oversees the approval process for any new labour hire agencies.

Attend: Group Director Operational Performance, Director of Human Resources, HR Manager - Engagement, Senior Lawyer and Procurement and Sustainability Manager.

Optional: Operational Directors for each of our States and Territories.

Frequency: quarterly.

Operational Structure

MacKillop's head office is located in South Melbourne, Victoria, with state-based administrative offices in Sydney, New South Wales, Perth, Western Australia, Darwin, Northern Territory and Australian Capital Territory. We also have many other offices and service locations in all of these states and territories. In total, during the reporting period, we operated from approximately 204 properties, including 46 administration sites and five schools.

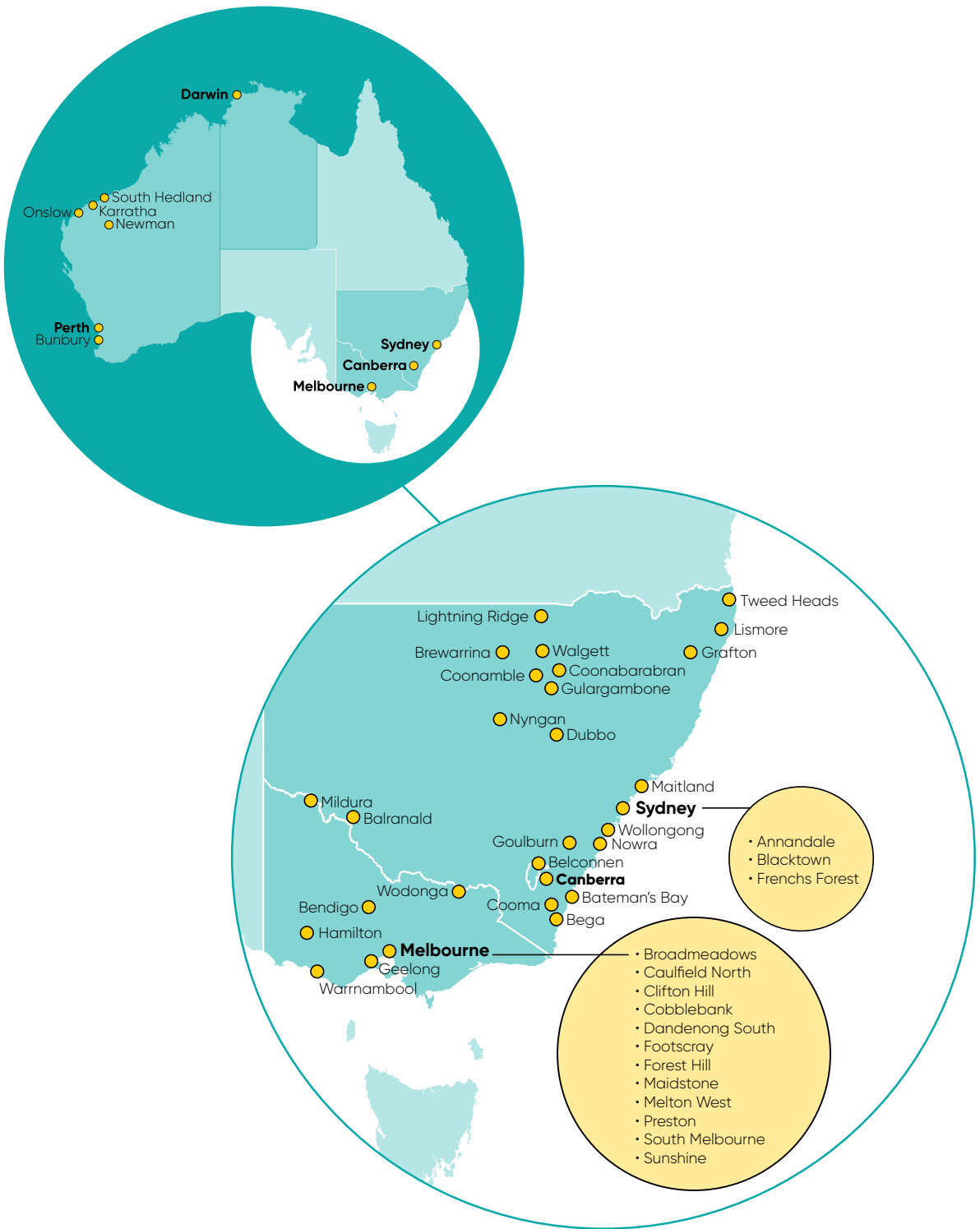


Figure Three: MacKillop Geographical Locations

Strong families

6,300+

families supported with early intervention and parenting support

1,270+

care leavers accessed records through our Heritage and Information Service

1,000+

families experiencing family violence and homelessness supported by McAuley Community Services for Women

Safe children

908

foster care placements for **487** children

614

foster carers nationally

581

young people in our residential homes

81

young people supported in our leaving care programs

103

young people supported in our homelessness programs in NSW

Thriving communities

280

students in our schools

614

foster carers nationally

1,711

educators trained in ReLATE trauma-informed education model

5,000+

Australian employees completed Sanctuary training

296

schools supported by Seasons for Life in 2024-25, to build capacity following a suicide or other loss event, with **900+** schools supported over three years

166

out of home care staff completed Power to Kids training



5

schools

180

residential homes for young people

46

offices

2300+

staff

Supply Chains

The majority of our annual procurement occurs with our first-tier suppliers located in Australia. However, we know our extended supply chains may be located overseas.

The key types of goods and services MacKillop sources remain similar to previous reporting periods. However, we have adopted a risk-based approach to managing our supply chains, with a focus on our high-risk categories. Our Due Diligence process with those suppliers is aimed at developing a better understanding of the modern slavery risks within their supply chain.

We maintain a comprehensive risk map, which includes the following elements: the geographic locations from which suppliers source materials, business profiles of organisations, and risk assessments as reported through Supplier Assessment Questionnaires (SAQs).

Criteria 3: Risks of Modern Slavery

MacKillop works to promote human rights - particularly the rights of children - and is committed to protecting the rights of all people including our employees, the communities in which we operate, those who may be impacted by our activities and our clients.

Our organisational risk framework incorporates the potential risks of modern slavery practices across our operations and supply chains.

As part of our assessment, MacKillop adopts the risk categories outlined in the Australian Government's Department of Home Affairs Guidance for Reporting Entities ("Guidance Report"), being risks that may cause, *contribute to*, and/or *be directly linked to* modern slavery practices. The Guidance Report also identifies that risks can arise due to the sector/industry, types of products and services, geographic locations, and business models that businesses operate within.

In reviewing the services we deliver, and the goods and services we procure, we remain of the view that while our operations do not cause or contribute to modern slavery practices, we may be directly linked to modern slavery risks through our supply chains.

Our assessment of modern slavery risks based on the sector/industry and types of products and services we procure in are outlined below and this is where most of our efforts are focused.

Operational Risks

We employ approximately 2,200 staff, operating from over 200 properties, including 46 administration sites. Our employees are engaged either by contract or under an award and/or industrial agreement. Several collective industrial agreements are in place and employees have a number of unions they can join.

Within our workforce, we have approximately 200 migrant workers (workers who hold a temporary visa in Australia). Our Human Resources team is responsible to ensure they have the appropriate visa with rights to work. Of those, only a small number are sponsored to work with us. Visa applications related to those sponsored positions are managed by our Human Resources Unit and an external immigration lawyer in accordance with immigration requirements and Australian law. We also have a significant labour hire agency workforce, some of which are migrant workers. During the Reporting Period, labour hire agency and recruitment costs remained our largest spend

category from prior years, with spend of approximately \$21,983,831 and approximately 16 suppliers. The labour hire workers to which this relates are predominantly contracted to work within our residential care homes. This category of suppliers is the focus of the Labour Hire Working Group, referenced above (page 8). During the Reporting Period, there were significant efforts made to reduce MacKillop's risk around Labour Hire. A number of improvements were introduced across the organisation, as outlined in Table Five (page 26).

In addition to our staff, we have almost 850 volunteer foster carers across Australia.

We have a range of systems in place to identify and action changes to employment entitlements, immigration requirements, equal opportunity requirements and health and safety legislation across all categories of our workforce.

We have a significant number of Policies and Procedures which govern how we relate to our staff and volunteers as well as our expectations about how our employees conduct themselves in our operations. We also have a Code of Conduct which sets minimum expectations about how our staff, volunteers and contractors conduct themselves.

Our Policies and Procedures are based on our organisational Purpose, Vision and Values and are reviewed and updated on a regular basis. This included the establishment of a Modern Slavery procedure, which outlines the measures we implement to identify, manage, and mitigate modern slavery risks across our operations, business partnerships, and supply chains.

We are committed to protecting and supporting whistleblowers who disclose improper conduct, in accordance with our Whistleblowers Procedure. In 2025 we engaged YourCall to enhance our whistleblower processes by offering a secure, anonymous, and reliable platform for submitting concerns at any time and from any location. YourCall serves as the intermediary between the whistleblower or discloser and MacKillop, facilitating communication while maintaining confidentiality throughout the process.

We also have a Strategic Internal Audit Plan which is reviewed by the Board Audit and Risk Committee annually and articulates the internal audits to be carried out each year, based on the needs of the business and identification of high-risk areas. In the Reporting Period, MacKillop conducted a number of Internal Audits to review and improve management of our Payroll, Brokerage Services and Complaints Management processes.

Supply Chain Risks

MacKillop is committed to developing systems and processes to improve the management of modern slavery risks within its supply chains.

Potential risks to MacKillop - including modern slavery risks - can arise due to the range of goods and services we source, the large number of geographic locations we operate in and the lack of controls or regulatory systems in the countries in which extended supply chains operate. Our aim is to progressively develop a robust approach to all procurement processes, practices and dealings with suppliers, which will assist in the mitigation of modern slavery.

Throughout the Reporting Period, the Procurement and Sustainability Manager has actively implemented the Category Management Strategy, directing MacKillop's attention to suppliers identified as having elevated risks of modern slavery within their supply chains.

We purchase a large volume of goods and services to provide our programs and services to the community. The majority of these purchases are managed through our spend management platform, and this captured spend is used in our procurement category management.

Total Spend

During the Reporting Period, MacKillop's total spend on goods and services recorded in our spend management platform was approximately \$86,398,837 with over 3,428 suppliers. Table One provides a breakdown of the number of suppliers and spend amount in each of MacKillop's spend brackets.

Spend Bracket	Number of Suppliers	Total Spend
Under \$1,000	1384	\$606,017
Between \$1,000 and \$4,999	1206	\$2,789,839
Between \$5,000 and \$9,999	280	\$1,977,841
Between \$10,000 and \$49,999	370	\$7,575,265
Between \$50,000 and \$99,999	77	\$5,550,937
\$100,000 plus	111	\$67,898,938

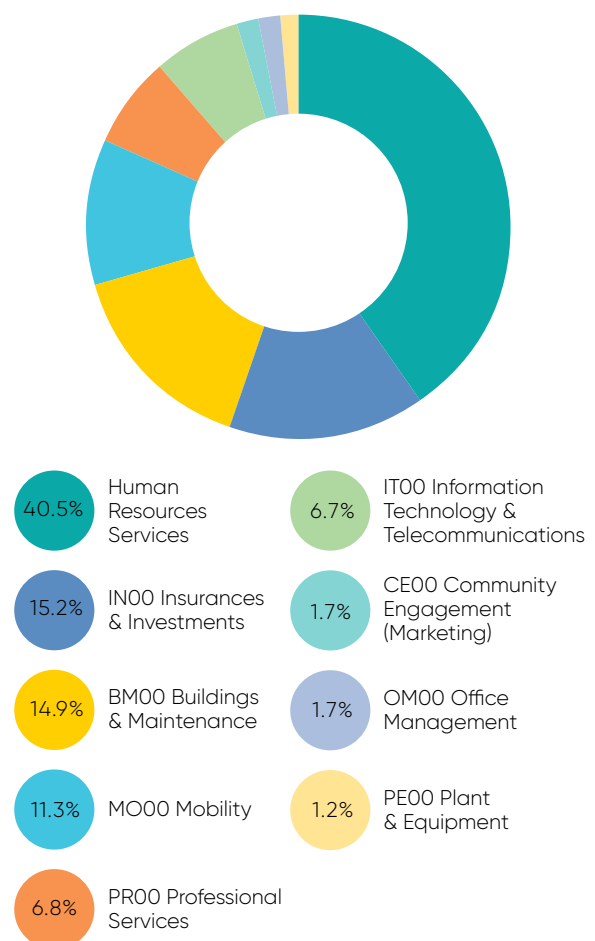
Table One: Break-down of Suppliers by Spend Bracket

Addressable Spend

MacKillop's 'Addressable Spend' captures spend relating to our nine main Procurement Categories and forty-five Sub-Procurement Categories. For the purpose of our category management, a number of expense types are excluded, such as client costs, partnership costs and fixed costs, such as rent.

Addressable Spend constitutes approximately 76% of our total spend. During the Reporting Period, the total Addressable Spend analysed via our spend management platform was \$65,589,627 spread over 2,225 suppliers. MacKillop spent \$100,000 ("Materiality Threshold") or more with 88 Suppliers within the Addressable Spend Procurement Categories. This analysis enables us to identify more accurately our significant key suppliers and conduct effective supplier relationship management processes.

Addressable Spend at MacKillop has been identified in the following Procurement Categories:



Graph One: Main Procurement Categories (Addressable Spend)

Underneath our main Procurement Categories, MacKillop has forty-five Sub-Procurement Categories. Table Two shows a sample of MacKillop's Procurement Sub-Categories, with the greatest percentage of Addressable Spend.

Category Main	Category Sub	Risk Rating	%
Human Resources Services	Agency Costs	High	34.75%
Insurances and Investments	Insurance Workcover	High	13.75%
Mobility	Vehicles Purchased	Medium	7.64%
Buildings and Maintenance	Buildings Maintenance	High	5.70%
Professional Services	Consultancy Costs	Low	5.65%
Human Resources Services	Contractors	High	3.38%
Information Technology and Telecommunications	Computer Repairs / Maintenance	Medium	2.41%
Buildings and Maintenance	Utilities	Medium	2.38%
Buildings and Maintenance	Cleaning Services and Materials	High	2.24%
Buildings and Maintenance	Buildings at Cost	High	2.11%
Information Technology and Telecommunications	Hardware	High	1.54%
Human Resources Services	Training Courses	Medium	1.46%
Mobility	Motor Vehicle Repairs/Tyres/Fuel	Medium	1.35%
Mobility	Motor Vehicle Other Costs	Medium	1.28%
Buildings and Maintenance	Landscaping and Grounds	High	1.17%

Table Two: Procurement Category Sub-Categories as a percentage of Addressable Spend (Top 15)

Risks within MacKillop's Main Procurement Categories and Supply Chains

The analysis of this spend data highlighted a number of categories where there may be a high risk of modern slavery. The high-risk categories where MacKillop has a significant portion of spend are:

- a. Agency Costs (Labour Hire)
- b. Investments (previous reporting periods)
- c. Buildings Maintenance
- d. ICT Hardware
- e. Cleaning Services and Materials

Agency Costs (Labour Hire)

MacKillop spent approximately \$22 million with 16 suppliers for Agency (Labour Hire) services. We understand labour hire services can pose a high risk for worker exploitation and modern slavery. These factors include:

- focus on low-skilled, low-paid, seasonal, temporary and or intermittent labour;
- recruitment of potentially vulnerable people such as new migrants, temporary visa holders, international students and undocumented workers;
- deceptive and opaque practices trapping workers into exploitative situations or modern slavery;
- demanding excessive fees for visas, documentation, travel arrangements, etc creating a debt trap and situations of bonded labour; and
- coercive control, threats, withholding workers' identity documents to limit their freedom of movement and social isolation from community or other supports is common practice.

During the Reporting Period, the Labour Hire Group has made a number of improvements, as outlined in Table Three (page 20).

Investments

MacKillop has an established Investment Procedure, which is annually reviewed by the Board Finance and Property Committee that sets out our investment guidelines and processes outlining our commitment to the principals of responsible investment. This includes the application of the United Nations Principles of Responsible Investing (UNPRI) to guide decisions on ESG issues and underlying managers.

Buildings Construction and Maintenance

In providing our services, MacKillop manages a large number of both commercial and residential properties. During the Reporting Period, we spent over \$5 million in maintenance and refurbishment costs with 337 suppliers. A significant part of the labour force used in the property maintenance and construction sector consists of low skilled, low paid workers often contracted through labour hire companies. Workers are often temporary migrants who face language barriers and a lack of understanding of Australian workplace law and rights. MacKillop aims to manage this risk through its contracting process and monitoring of services.

Information and Communication Technology (ICT) Hardware

ICT hardware including computers, phones and computer peripherals are purchased through our Corporate Services IT team. During the Reporting Period we purchased over \$4.4 million in ICT related goods and services including \$1.1 million on hardware. According to the 2018 Global Slavery Index, electronics are the highest risk product for modern slavery in supply chains. Forms of modern slavery identified by the Global Slavery Index and other reports as being present in the electronics sector include passport retention or doctoring of identity documents, restriction of freedom of movement, poor living conditions, underpayment, fines and illegal salary deductions, excessive working hours and unpaid overtime.

Cleaning Services and Materials

Cleaning services and materials comprises a significant part of our facilities maintenance costs. During the Reporting Period, MacKillop spent a total \$1.4 million for cleaning service providers and cleaning materials. The cleaning sector typically employ low skilled (often migrant) workers who face significant language barriers and a lack of understanding of their rights. Opaque sub-contracting arrangements are also common. Jobs in this sector are low paid (often cash in hand), have high rates of staff turnover with staff often moved between multiple worksites. Equipment and consumables used in these sectors are largely manufactured overseas, predominantly in high-risk countries such as China and Vietnam.

Risks within MacKillop’s Main Procurement Categories and Supply Chains According to ACAN’s Risk Category Taxonomy

Alongside MacKillop’s category management analysis previously outlined, we have conducted an additional review of our high-risk categories using the ACAN Risk Category Taxonomy. This classification standard identifies severity of actual or potential harm to people (saliency) in spend categories.

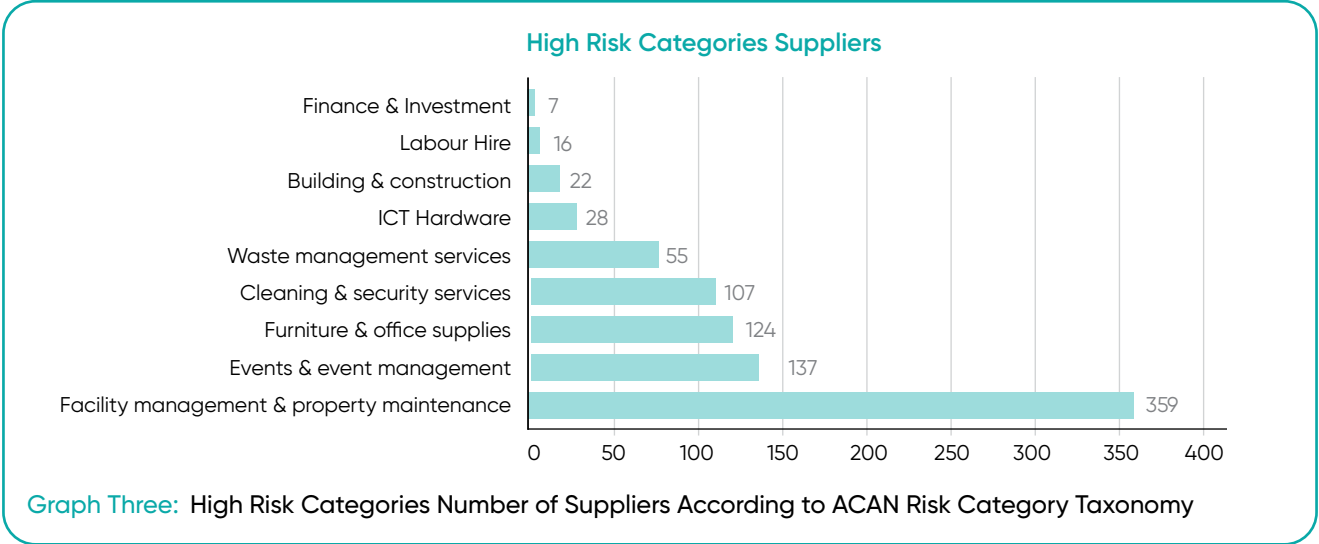
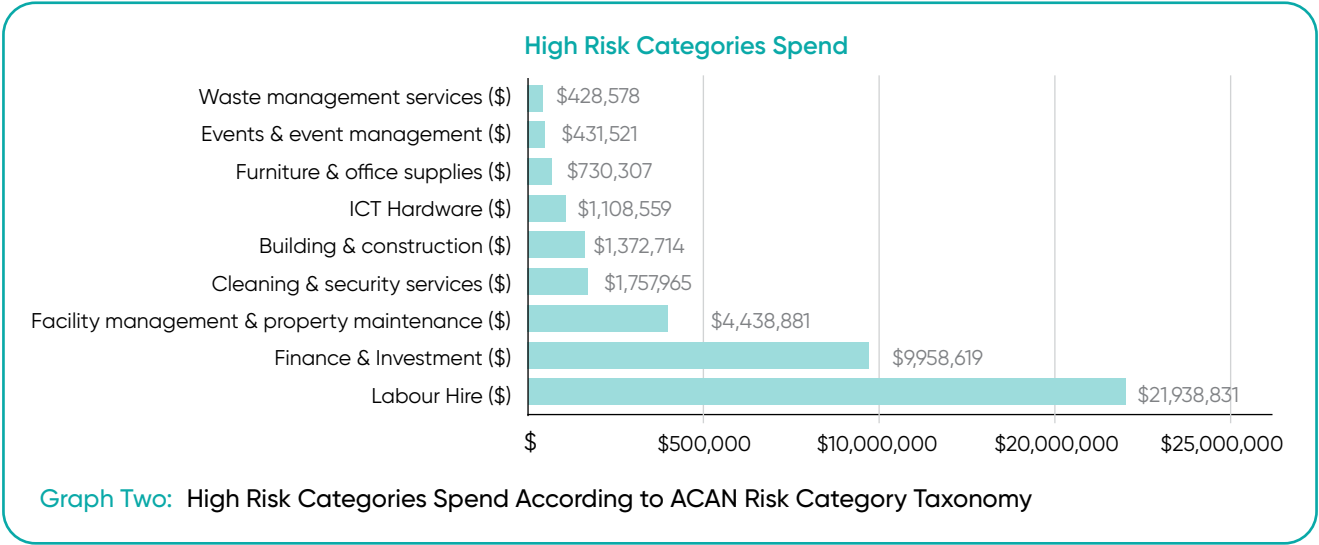
The ACAN Category Risk Taxonomy is based on sources such as:

- the Global Slavery Index
- the International Labor Organisation (ILO), including definitions of modern slavery
- the Bureau of International Labor Affairs (ILAB), U.S Department of Labor
- the Global Child Forum and UNICEF.

Four key factors are also used to determine the level of risk:

- **Geography:** the country or location where a good is made or service is delivered
- **Industry:** the sector in which the making of goods or delivery of service occurred
- **Commodity:** the raw materials or components that comprise the goods or products
- **Workforce vulnerability:** such as bonded visas, temporary migrants, women or children known to be employed in specific industry sectors
- **Domus 8.7:** trends, cases, and risk intelligence identified through the Domus 8.7 remediation service, including grievances and remediation insights relevant to category and risk to workers.

The following section provides a detailed summary of our expenditure and supplier counts as categorised by the ACAN Risk Category Taxonomy.



Criteria 4: Actions to Assess and Address Modern Slavery Risks

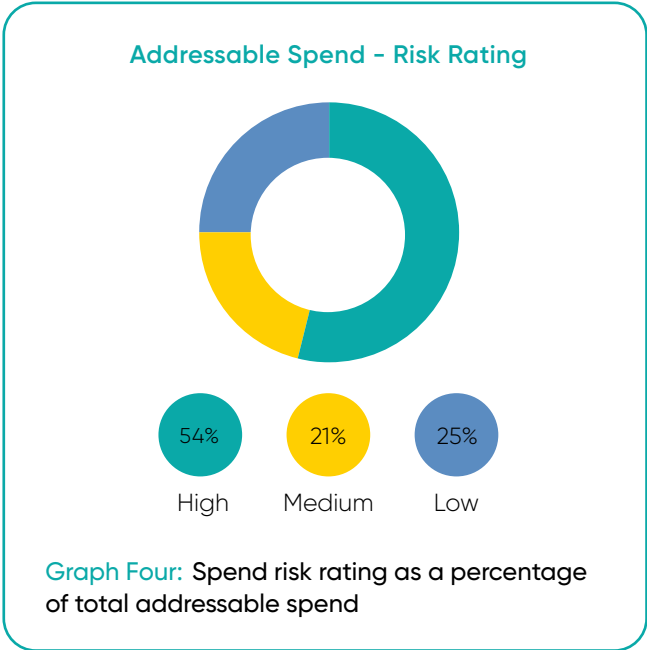
MacKillop undertakes a number of processes and actions to assess and address modern slavery risks in our supply chains. Through our current procurement Strategic Plan for 2024-2027, we have set new key priorities as detailed below.

Procurement Strategic Plan 2024-2027

The implementation of our Procurement Strategic Plan 2024-2027 began in 2024. A central element of the plan is Supplier Relationship Management (SRM), which involves adopting a structured methodology for evaluating and overseeing our suppliers. In addressing modern slavery, SRM places particular emphasis on Risk Management. By fostering improved engagement between suppliers and our organisation, we strive to more effectively identify and mitigate supply chain risks, including those related to modern slavery.

Category Management Processes

MacKillop's Procurement Team conducts regular spend analytics and category management reporting. These reports are utilised to pinpoint areas of expenditure and associated suppliers that may present a heightened risk for modern slavery, necessitating a thorough due diligence process. In collaboration with relevant stakeholders, we assess suppliers as well as the goods and services they provide, which informs the level of due diligence required. If a supplier fails to meet our standards, we discontinue the relationship and pursue alternative options.



Sourcing Process

MacKillop operates with a centrally led procurement structure, whereby the Procurement Team delivers the necessary framework and facilitates the organisation's key sourcing requirements. Both the Procurement and Legal and Governance Teams possess comprehensive knowledge of modern slavery risks and organisational obligations. These considerations are integrated into sourcing procedures and supplier contractual agreements.

MacKillop has implemented formal tendering protocols that incorporate supplier due diligence processes. Due diligence requests include information pertaining to modern slavery risks. Furthermore, tender evaluation processes feature mandatory criteria for meeting modern slavery requirements where relevant.



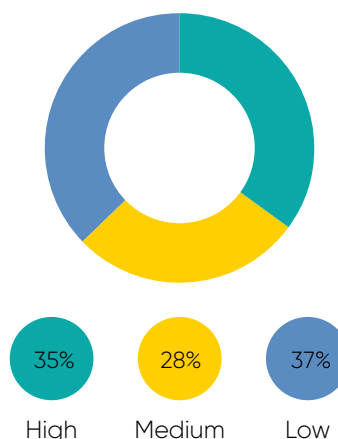
Supplier Relationship Management and MacKillop's Materiality Threshold

MacKillop continues to focus on a supplier relationship management approach as part of its procurement strategic objectives. MacKillop has built its modern slavery risk management strategy around its materiality threshold of suppliers with spend greater than \$100,000 during the Reporting Period. An important part of this process is to identify key suppliers that may have inherent risks or a strategic benefit for MacKillop. As part of this targeted approach, we identify those suppliers in high-risk categories for modern slavery and undertake a due diligence process.

During the Reporting Period, we spent \$100,000 or more with 107 suppliers in Addressable Spend Procurement Categories.

A high-level risk identification of the 107 suppliers was completed using the ACAN Risk Taxonomy for the basis of the risk rating into High, Medium and Low, the percentage of suppliers in each of these risk rating categories is shown in Graph Four below.

Key Supplier Risk Rating



Graph Five: Risk Rating – Suppliers Over Materiality Threshold (107 Suppliers)

Where these suppliers meet the compliance and onboarding requirements of MacKillop, they are classified as 'Preferred Suppliers' and added to our 'Preferred Supplier Register'. One of the requirements of a Preferred Supplier is that they meet our modern slavery risk mitigation requirements that includes acceptance of any modern slavery clauses in our supplier agreements and/or supplier code of conduct.

ACAN Modern Slavery Risk Management Program

MacKillop is a participant of the Australian Catholic Anti-Slavery Network (ACAN) Modern Slavery Risk Management Program. ACAN has set a mission to eliminate modern slavery in all its forms from the operations and supply chains of Catholic entities in Australia. As a participant in this network, we have access to tools and resources that support due diligence processes on suppliers.

Supplier risk management and engagement steps are shown below and result in suppliers being placed on a pre-qualified directory. Further due diligence actions includes verification of data and monitoring.

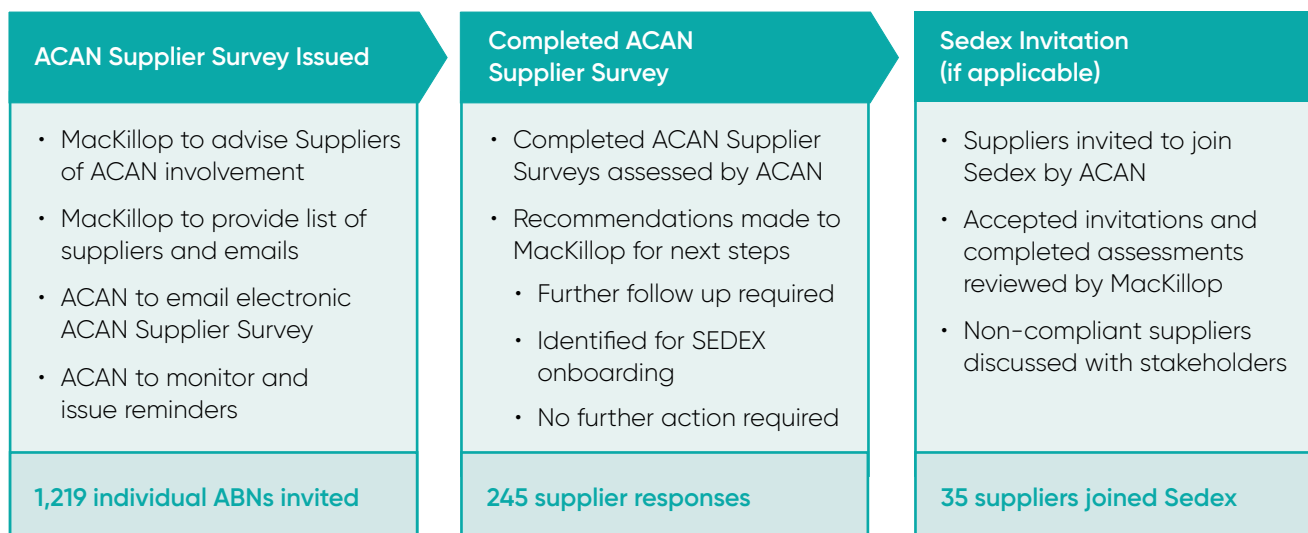


Figure Four: MacKillop and ACAN Supplier Risk Management and Engagement Process

In 2025 the ACAN Modern Slavery Risk Management Program launched a new purpose-built data management platform - ROTA. ROTA centralises the ACAN Risk Management Program framework and facilitates supplier performance evaluation and engagement through:

1. Evaluation of modern slavery risk within operations and supply chains, using the ACAN Risk Taxonomy
2. ACAN Supplier Survey to identify supplier revenue, number of employees, countries of origin for goods sourced overseas, workforce contractual arrangements and Sedex membership status.
3. Supplier education on modern slavery and risk management in key areas: cleaning, building and construction, procurement of labour, labour hire and services, sourcing goods from overseas, grievance mechanisms and remediation
4. Onboarding suppliers to Sedex requires a business address, contact details and goods or services provided
5. Sedex Self-Assessment Questionnaire (SAQ) helps suppliers to evaluate their practices against established standards and identify areas for improvement
6. Desktop review to identify key actions required from suppliers
7. Enhance supplier screening using Know Your Client (KYC) intelligence software
8. Corporate Social Compliance Audits provide a point in time, objective and independent verification process of supplier alignment with local laws and worker wellbeing standards
9. Domus 8.7 Index modern slavery statement assessment on selected suppliers in high-risk categories
10. ACAN Prequalified Supplier Directory - a list of preferred suppliers accessible to Catholic organisations.

Policies and Procedures

Our Policies and Procedures provide the foundation for our commitment to human rights. We have Policies, Procedures and a Code of Conduct that are intended to promote child safe, ethical and legally compliant personal and organisational conduct across all facets of the organisation, including directors, employees, contractors, suppliers and business partners.

Throughout the reporting period, MacKillop maintained a commitment to continuous improvement in reviewing its Policies and Procedures, including the integration of modern slavery risk management as detailed in Achievement Table Three (page 19-20).



Achievements During the Reporting Period

During the Reporting Period we have continued to implement our Procurement Strategy initiatives. The below table outlines our actions and achievements taken during the reporting period, and how we monitored, reported and evaluated the effectiveness of those actions:

Action/ Achievement	Measuring Effectiveness
Accountabilities and responsibilities for modern slavery have been integrated into position descriptions.	• Clear accountability.
We conducted a review and revision of the Terms of Reference for our Modern Slavery Working Group along with an assessment of the cross-functional team participating in the working group.	• Clear governance and responsibilities. • Cross functional integration. • Improved risk management.
An assessment of policies and procedures, such as Recruitment Policies and Procedures, Whistleblower Procedure, Grievance and Complaints Procedure, Code of Conduct, and Labour Hire Procedure, have been conducted.	• Number of policies and procedures reviewed. • Integration of modern slavery risk management.
The quarterly Board Audit & Risk Modern Slavery Report has now been provided to the Executive Leadership Team.	• Greater awareness and visibility of the status of our modern slavery strategy.
Collaborating with the Human Resources department to enhance due diligence procedures in the selection of recruiters, with particular attention to identifying relevant risks and ensuring adherence to our zero-tolerance policy regarding modern slavery.	• Compliant Recruiting Agencies. • Improved stakeholder engagement.
The Labour Hire Workforce has been successfully incorporated into our Workforce Management platform, enabling enhanced oversight and administration of this group.	• Improved visibility and management of Labour Hire workers.

Action/ Achievement	Measuring Effectiveness
Enhanced our supplier risk management procedures to strengthen engagement with suppliers on issues related to modern slavery.	Improved risk assessment processes.
A Supplier Risk Register has been integrated into our Procurement Risk Register for high-risk suppliers, accompanied by details outlining the specific risk management strategies implemented.	Enhanced risk identification and risk management.
Our Labour Hire Due Diligence procedures are being further enhanced by our cross-functional Labour Hire Working Group, which actively addresses operational performance issues and compliance issues.	Improved Labour Hire Agency performance and compliance.
Engaged ACAN Program Manager services to provide comprehensive support including annual action planning, participation in monthly ACAN Modern Slavery Working Group, and access to Rota risk management platform.	Adopting best practice modern slavery risk management processes.
A modern slavery procedure has been established and published, incorporating a clear workflow for addressing any identified risks related to modern slavery.	Enhanced understanding of modern slavery processes.

Table Three: Achievements in Reporting Period 2025



Future Goals

We are committed to ensuring we provide appropriate and timely remedy to people impacted by modern slavery as a result of our operations, or by the conduct and/or supply chain of our suppliers, in accordance with the *United Nations Guiding Principles on Business and Human Rights*, *Commonwealth Modern Slavery Act 2018 - Guidance for Reporting Entities* and relevant Australian laws.

To further our modern slavery objectives, we have developed an action plan for 2026 that aligns with and strengthens our overall strategic framework. The actions outlined below will be managed through our Modern Slavery Working Group, with oversight from the Board Audit and Risk Committee and the Executive Leadership Team.

Pillar	Action for 2025
Governance and Compliance	Deliver the 2025 Modern Slavery Statement in accordance with statutory obligations under the Modern Slavery Act 2018 (Cth).
	Continue to enhance governance and oversight by maintaining regular reporting processes to the Board Audit and Risk Committee and Executive Leadership Team. This approach will foster robust governance, promote transparency, and ensure timely escalation of issues when necessary.
	Integrate modern slavery responsibilities into governance documents and conduct expectations to strengthen accountabilities and support long-term cultural change.
Policies and Controls	Integrate BF-P-133 Modern Slavery Procedure into BAU procurement and governance processes to strengthen internal control maturity and support consistent application across the organisation.
	Embed modern slavery into enterprise risk management & procurement decision-making (risk framework alignment and category management focus on elevated risk suppliers).
Capability and Culture	Increase Modern Slavery training completion (staff, managers, Board & Executive) to improve awareness, early risk identification and escalation capability across the organisation.
Supply Chain	Deepen supplier due diligence using ACAN tools and SEDEX for high-risk suppliers, improving visibility and enabling more targeted risk responses.
	Engage proactively with high-risk suppliers to address grievance mechanisms and provide targeted training, ensuring these suppliers implement appropriate channels for grievances and are fully informed of MacKillop's standards and expectations.
Grievance Mechanisms and Remedy	Operate and promote independent grievance mechanisms for staff and supply chain workers that supports victim-centred responses and aligns with best practice.
	Develop and communicate a defined procedure and process flow for responding to any identified Modern Slavery risks.

Table Four: Future Goals for 2026

Grievance Mechanism

Our mission and values underline our commitment to ensure all employees and those working with MacKillop feel safe and supported and know that MacKillop is working to maintain the highest standards of governance, compliance and ethical behaviour.

MacKillop has a robust Complaints and Whistleblower Procedure which provide a way for employees, volunteers, suppliers, contractors or other eligible people to report their concerns confidentially.

In addition, MacKillop's Sanctuary Commitment to **Democracy** provides a strong framework for staff to participate and influence decisions that affect them.

One of the Tools used as part of MacKillop's trauma-informed care model Sanctuary is the S.E.L.F Model, where staff are engaged to share and contribute to decision making. S.E.L.F, representing Safety, Emotions, Loss and Future, is one of the Four Pillars of the Sanctuary Model and can be used in a variety of settings such as Supervision, Team Meetings, Debriefs, Red Flag meetings, Care and cultural support planning. The S.E.L.F model is designed to help an organisation understand and process many of the complex changes that happen in its environment.



Figure Five: Sanctuary S.E.L.F. Model

Remediation

As a participant in ACAN, we have access to Domus 8.7 - an independent program to provide remedy to people impacted by modern slavery. We will develop response procedures and engagement with Domus 8.7 and other civil society stakeholders. By partnering with Domus 8.7 we can help people impacted by modern slavery achieve meaningful, reportable outcomes and continuously improve risk management and our response.

Where we identify direct links to modern slavery through our suppliers, we are committed to working with the suppliers to ensure remediation and mitigation of the risk of recurrence. We intend to implement remediation obligations and expectations in contracts with high-risk suppliers who must notify and consult with us to ensure victim-centred remediation processes are implemented to our satisfaction.



Domus 8.7

MacKillop is a founding member of Domus 8.7. Domus 8.7 was established as an agency of the Catholic Archdiocese of Sydney in 2020 as a key element of the ACAN Modern Slavery Risk Management Program. This collaborative approach to remediation is aligned with the Modern Slavery Act and Catholic Social Teaching which are centred on the needs, wellbeing and empowerment of people impacted.

Domus 8.7 provides MacKillop:

- resources that enable us to listen to workers (grievance channel)
- a 24/7 careline for workers on our sites, staffed by professional counselors
- direct support to people impacted by modern slavery
- guidance and technical assistance to prevent, identify and remediate modern slavery
- a documented process to assess if an organisation has caused, contributed or is directly linked to modern slavery and modern slavery indicators.

Domus 8.7 empowers people impacted by modern slavery to have choice and control over what forms of remediation are meaningful to them and to engage safely with business/supply chain actors. Supports may include:

- modern slavery indicator assessment
- needs assessment, case coordination, response and remediation planning
- referrals to community, social services, unions
- transport, accommodation, financial and food support
- legal support, referrals, accompaniment and advocacy
- job training, retraining and redeployment
- accompaniment and advocacy to engage with government and law enforcement agencies
- opportunities to contribute lived expertise to improve modern slavery responses

The Domus 8.7 Advisory Committee Members also include a person with lived expertise, Mr Moe Turaga. Domus 8.7 is a registered charity with the Australian Charities and Not-for profits Commission (ACNC) and is an endorsed Public Benevolent Institution with Deductible Gift Recipient (DGR) status. ABN 244 72497189.



Criteria 5: Measuring Effectiveness

MacKillop recognises and values the importance of reviewing its practices, with the objective of improving the effectiveness of processes and systems implemented to address modern slavery risks.

The Procurement and Sustainability Manager is tasked with executing the Procurement Strategic Plan 2024-2027, as well as overseeing the primary initiatives and actions detailed in Achievements (page 19). Table Three provides a summary of the actions and accomplishments during the reporting period, along with the methods used to monitor, report, and assess the effectiveness of these initiatives.

Risk Management Framework

The Procurement Team, in collaboration with the Risk and Compliance Manager, is continuing to embed modern slavery risks into MacKillop's Risk Management Framework. In 2025, MacKillop established a supplier risk register as an integral component of its SRM strategy, systematically documenting risk descriptions and corresponding mitigation strategies for high-risk suppliers.

Awareness and Training

One of the very important parts of our work is awareness and training.

We have introduced a number of modern slavery training modules into our Learning and Development system. To date, our Board, the Executive Leadership Team and selected Managers have been trained. All other MacKillop staff have also been invited to participate in the training. During the Reporting Period, we continued to undertake a targeted approach in our training schedule by issuing training to MacKillop staff who were identified as participating in the purchasing process in high-risk categories of goods and services.

Our Learning and Development team have created an automated weekly report showing employee training completion status, thereby enabling the organisation to track and monitor the completion of training.

We have developed a Modern Slavery Communications Plan as part of our overall Procurement Communications Plan. This is aimed at increasing awareness of National and International events related to modern slavery and providing important information to staff about our actions. We have committed to a minimum number of annual communications to ensure that modern slavery awareness and understanding continues to be enhanced throughout the organisation.



Demonstrating Continuous Improvement

Collaboration is at the heart of accelerating progress. This also includes opportunities to comparatively measure social, environmental and governance (business ethics) risks and actions with ACAN peers.

In its foundational stages, MacKillop used an internally devised ACAN framework to measure progress. This bespoke approach reflected the unique priorities, constraints, and practices across Catholic organisations.

In 2025, the ACAN Program adopted a globally recognised risk measurement system through SEDEX. This aligns reporting entities with a methodology that combines global data about risks in different countries and industries with site-specific information from the SEDEX platform. SEDEX regularly updates the methodology to ensure it is aligned with new and emerging risks. Therefore, completion of the SEDEX SAQ completed by MacKillop is a substantial measure of continuous improvement year on year. Below is an explanation of how scoring is calculated using the SEDEX SAQ and MacKillop's 2025 risk scores and management controls that will serve as our benchmark for continuous improvement.

Explanation of Scoring

Combined Risk Score 3.3/10 (Low risk) - calculated from inherent risk and site characteristics, adjusted for management controls and audit results. The score is broken down by pillar and highlights strengths and opportunities to focus our efforts on key areas that drive ethical and sustainable practices.

Inherent Risk Score 3.0/10 (Low risk) - predicts potential risks based on a country/region, and sector. Spanning all four pillars, this score is broken down by topics. It can be used as a baseline to identify and prioritise areas for improvement in operations. This score shows the natural risks of doing business in a specific country or sector. It does not include any details about individual sites.

- **Labour Standards Pillar** - assesses location and industry factors that could increase labour risks, such as vulnerable worker populations or high rates of workplace violations.
- **Health and Safety Pillar** - considers regional and industry-specific health and safety risks, including local regulations and industry accident rates.
- **Business Ethics Pillar** - assesses industry and location risks related to unethical practices, such as high corruption levels or weak regulatory oversight.
- **Environment Pillar** - examines the environmental impact of the site's industry and location, such as pollution levels or resource use that may create regulatory or compliance risks.



Site Characteristics Risk Score 3.5/10 (Low risk)

Highlights potential risks based on your suppliers' SAQ responses in the Labour Standards and Health and Safety pillars. This score can be used to assess and support the implementation of policies and processes that mitigate workplace risks within your supply chain. For the Environment SAQ, site characteristics consider the type of work, business and location (e.g. proximity to sensitive areas). For the Core SAQs, risks are assessed based on the nature of the work, such as exposure to heavy machinery or hazardous materials.

- **Labour standards** - reflects labour-related risks like employment practices, workers rights and wages based on SAQ responses. High-risk activities in this area can raise the score.
- **Health and Safety** - based on SAQ responses to questions about site-specific health and safety factors, such as equipment usage, handling of chemicals or accident risks.
- **Business Ethics Pillar** - assesses industry and location risks related to unethical practices, such as high corruption levels or weak regulatory oversight.
- **Environment Pillar** - examines the environmental impact of the site's industry and location, such as pollution levels or resource use that may create regulatory or compliance risks.

Management Controls Score 4/5 (Advanced)

This score measures how well policies or processes are in place to reduce the risks from the site characteristics. It is also based on answers in the SAQ. A Poor score of 0-0.9 indicates that there are few or no controls in place. An Advanced score of 4-5 indicates that there are exemplary controls that exceed compliance and drive innovation.

- **Labour standards** - evaluates policies and processes to ensure fair labour standards and worker protections are effectively managed.
- **Health and Safety** - reviews the adequacy of safety protocols, emergency preparedness and training efforts to manage health and safety risks on site.
- **Business Ethics** - evaluates controls against unethical practices such as anti-bribery policies, compliance with legal standards and transparent operations.
- **Environment** - looks at policies managing environmental impact, resource efficiency and waste reduction practices to align with sustainability standards.

MacKillop Baseline Data

Part of our annual assessment processes is completing an annual questionnaire and inputting key modern slavery metrics. This data is then extracted in the below report where it is used to track and assess the performance of key components in our modern slavery risk management processes.

	Activity	2024	2025
Internal / Staff	Hours spent on modern slavery activities	330	330
	Individual staff completing e-learning	50	64
	E-learning modules completed	116	130
External / Supplier Engagement	Number of suppliers with visible contact information and ABN	2962	1219
	Number of suppliers across high-risk categories	409	631
	Number of ACAN Supplier Surveys completed	243	245
	Supplier staff attending capacity building webinars	12	17
	Invited to join Sedex	52	44
	Joined Sedex	41	35
	Sedex SAQ completed	15	26
	Social audits	0	0
	Corrective actions	0	0
DOMUS 8.7 External Referrals	Contacts made via worker voice / grievance mechanism	0	0
	Referrals for advice and assistance	0	0
	Individuals identified or referred for modern slavery assessment	0	0
	Individuals with modern slavery cases remedied	0	0

Table Five: MacKillop's Baseline Data for 2024-2025

Other Measures

Other key metrics used to measure effectiveness include a minimum number of Executive Leadership Team members on our Modern Slavery Working Group (MSWG), minimum number of meetings held by our MSWG per year, continuous review of our Policies and Procedures, completion of the annual Procurement Work Plan each year, meeting goals in the Procurement Strategic Plans and ensuring MacKillop meets the reporting requirements within the Act.



Criteria 6: Consultation

MacKillop does not own or control any other entities; therefore, this criterion is not applicable.

Criteria 7: Other Relevant Information

The Australian Catholic Anti-Slavery Network

In June 2021, we joined ACAN. ACAN brings together Catholic entities to share resources and coordinate action to manage and mitigate modern slavery risks across their industry sectors. During the Reporting Period, MacKillop participated in the ACAN Forum's, completed an annual Entity Profile Survey, which forms the basis of the Compendium of Modern Slavery Statements aggregated data.

ACAN continues to advance its modern slavery risk management program by implementing enhancements that strengthen processes and tools. These improvements include the launch of the Rota digital solution platform, which features dashboards with templates, tools, and resources. Additionally, the Domus 8.7 Careline service has been introduced, providing a dedicated phone number (1800 247 878) staffed around the clock by workplace specialists, as well as access to interpreter services.

Raising Awareness at MacKillop Family Services

MacKillop is committed to raising awareness on the risks of Modern Slavery and our broader Sustainability commitments. We endeavour educate our staff through ongoing communications within the organisation. Examples of communications throughout the year include

- a. **7 February 2025 - Reflection for the Feast Day of St Josephine Bakhita and International Day of Prayer and Awareness against Human Trafficking.**
This communication included a link to the *UNODC Global Report on Trafficking in Persons* providing a snapshot of trafficking patterns and flows at global, regional and national levels.
- b. **20 February 2025 - World Day of Social Justice:**
Staff were invited to connect with our *MacKillop Purpose Statement, MacKillop Values and Sanctuary Commitments* with a commitment to care compassionately, respond large-heartedly and advocate courageously.

- c. **12 June 2025 - Reflection sent for World Day Against Child Labour** with an invitation to reflect deeply on the role each of us can play in advocating for change.

- d. **18 - 24 June 2025 - Refugee Week:**
The theme for Refugee Week in 2024 was *Finding Freedom: Diversity in Community* emphasising the vital role community plays in our lives, regardless of race, ethnicity, religion, gender, language, disability, sexuality and age.

- e. **30 July 2025 - World Day Against Trafficking in Persons:**
Our *Modern Slavery Statement* was highlighted along with our *Sustainable Development strategy* aligned to the *UN Sustainable Development Goal 16 for Peace, Justice and Strong Institutions*.

- f. **4 & 5 October 2025 - World Day of Migrants and Refugees:**
We asked for a commitment to engaging with the stories of migrants and refugees not only today but every day.

- g. **11 October 2025 - United Nations International Day of the Girl Child (IDG):**
An annual and internationally recognised observance that empowers girls and amplifies their voices. The theme for 2025 was *"The girl I am, the change I lead: Girls on the frontline of crisis"*. Staff were sent information and resources on the awareness day.

- h. **17 November 2025 - World Day for the Prevention of and Healing from Child Sexual Exploitation, Abuse and Violence:**
We asked our staff to find strength in our solidarity, courage in our creativity, and hope in our shared vision of a world where every child can grow free from fear and harm.

- i. **5 December 2025 - Communications issued for the UNs International Day for the Abolition of Slavery.**
This communication was used to launch our *Modern Slavery Procedure* for the purpose of providing a clear framework for identifying, managing, and reducing the risks of modern slavery within our organisation, partnerships and supply chains.

- j. **10 December 2025 - Human Rights Day 2025:**
The Human Rights, Our Everyday Essentials.



MacKillop Family Services Limited

ACN 078 299 288 ABN 078 299 288

Head Office

237 Cecil Street
South Melbourne VIC 3205

📞 03 9257 2288

✉️ enquiry@mackillop.org.au



MacKillop Family Services acknowledges Aboriginal people as Australia's First Peoples and as the Traditional Owners and Custodians of the land on which we live, work and play. We pay our deep respects to Elders past, present and emerging.*



As a Rainbow Tick organisation, MacKillop values an inclusive culture where lesbian, gay, bisexual, trans, queer, gender diverse, intersex and sexual people (LGBTIQ+) have the right to be safe.



mackillop.org.au



2025 Modern Slavery Statement



1 January – 31 December 2025
ABN 76 654 014 794

Acknowledgment of Country

We acknowledge Australia's first peoples and as the traditional owners and custodians of the land on which we live, work and play.

We pay our deep respects to elders past, present and emerging, and acknowledge all aboriginal children, young people, families, and staff who are a part of Marist Schools Australia. We embrace and commit to the spirit and work of self-determination and reconciliation.

Disclosure Note

This Statement has been made on behalf of Marist Schools Australia (ABN 76654014794). It covers the following 12 colleges:

Assumption Catholic College, Kilmore VIC, ABN 85 917 803 177
Lavalla Catholic College, Traralgon VIC, ABN 74 453 482 885
Marcellin Catholic College, Bulleen VIC, ABN 77 413 001 496
Marist College Ashgrove, Ashgrove QLD, ABN 13 937 359 780
Marist College Bendigo, Bendigo VIC, ABN 48 218 856 996
Marist College Canberra, Pearce ACT, ABN 62 466 078 521
Newman College, Churchlands WA, ABN 34 822 196 385
Red Bend Catholic College, Forbes NSW, ABN 70 721 984 562
Sacred Heart College, Adelaide SA, ABN 52 010 674 805
St Gregory's College, Campbelltown NSW, ABN 42 940 977 322
St Joseph's College, Hunters Hill NSW, ABN 75 236 399 077
The John Berne School, Lewisham NSW, ABN 68 159 428 251

Marist Schools Australia Head Office:

Suite 5.01, 247 Coward St

Mascot NSW 2020

Phone: 02 9218 4000

www.msa.edu.au

Modern slavery contact: msabusiness@marists.org.au



**Marist Schools Australia
2025 Modern Slavery Statement**



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Foreword, Approval and Signature

Marist Schools Australia Limited (MSA Ltd) recognises its fundamental responsibility to respect the dignity of all people through identification of practices in modern slavery within operations and supply chains in which it engages. This commitment is consistent with MSA's worldview which is informed by Catholic Social Teaching, and the belief that the dignity of all people is rooted in their creation in the image and likeness of God. Upholding an ethical reputation is essential, as it fosters trust in our community service, and presents the face of Jesus Christ to those whom we seek to serve. MSA Ltd remains committed to the Australian Catholic Anti-slavery Network Modern Slavery Risk Management Program (ACAN Program), collaborating with other Catholic entities to end modern slavery.

MSA's stance on modern slavery acknowledges the potential impact of commercial activities on vulnerable populations. We are dedicated to taking practical measures to mitigate risks within our operations and supply chains. We closely collaborate with ACAN to engage with both current and potential suppliers and contractors, ensuring adherence to our policy and safeguarding the freedom and dignity of all individuals.

MSA Ltd have prepared this statement as a vital part of this process. MSA Ltd further commits to continually reviewing and improving its practices and those of its suppliers to ensure the risks of modern slavery within the organisation's operations are addressed.



A handwritten signature in black ink, reading "David Hall".

Professor Brother David Hall fms
Board Chair



A handwritten signature in black ink, reading "F. C. Malloy".

Dr Frank Malloy
National Director

This Modern Slavery Statement was approved by the principal governing body of Marist Schools Australia Limited as defined by the Modern Slavery Act 2018 (Cth) ("the Act") on 26 June 2026.

This Modern Slavery Statement is signed by a responsible member of Marist Schools Australia Board Limited (MSA Ltd) as defined by the Act.

Marist Schools Australia Limited's Modern Slavery Statement is made pursuant to the *Commonwealth Modern Slavery Act 2018* (Cth) ("the Act") and relates to activities undertaken in 2025.



St Marcellin Champagnat with school children and parents.

Criterion 1: About Marist Schools Australia

Marist Schools Australia (MSA Ltd) exists to support the Catholic Church's evangelising mission to make Jesus Christ known and loved and to ensure quality education in the Marist tradition through its schools.

MSA Ltd is a not-for-profit company established to carry on the Marist tradition of quality Catholic education founded by the Marist Brothers in Australia in 1872 and inspired by St. Marcellin Champagnat. MSA Ltd governs, operates and manages twelve schools across Australia.

MSA Ltd is the largest provider of school boarding programs in Australia, offering boarding in six of its schools. It also provides a specialised school for those students that are unable to participate in mainstream schooling in the Sydney, NSW area. MSA Ltd schools include education through both a single sex and co-educational setting from Kindergarten/Foundation to Year 12.

Since January 2022, MSA Ltd has been responsible for:

- ensuring, as a priority, that the twelve Colleges, which they govern, manage and operate, follow modern, best-practice governance. This ensures compliance with Australian laws (including education regulations) and provide a safe and supportive learning environment that reflects Catholic education and Marist values.

- offering formation, professional development programs, staff training, and youth ministry resources to fifty-six schools in total, acknowledging that many of them are governed by separate diocesan or other authorities.

The Marist School's Australia Limited's annual turnover for 2025 was \$497,904,750.



The oldest Photo of a Marist Brothers Community in Australia

Criterion 2: Our Structure, operations and supply chains

Structure

MSA Ltd is a public not-for-profit company limited by guarantee and registered with the Australian Charities and Not-For-Profit Commission. MSA Ltd is formed to continue the education ministry of the Trustees of the Marist Brothers and the Association of St Marcellin Champagnat in order to continue to make Jesus Christ known and loved, and to ensure quality Catholic education in the Marist tradition through its schools.

There are fifty-six schools across Australia that operate in the Marist tradition and who are part of the Marist Schools Australia Network. MSA Ltd directly governs twelve schools Australia-wide including in New South Wales, Queensland, Victoria, South Australia, Australian Capital Territory and Western Australia.

The governance and leadership framework of MSA Ltd is presented in a conceptual framework on the following page.

MARIST SCHOOLS AUSTRALIA LIMITED (MSA Ltd)

GOVERNANCE AND LEVELS OF DELEGATED LEADERSHIP AUTHORITY

1 GOVERNANCE

Company Member
Marist Association of St Marcellin Champagnat Limited
(MASMC Ltd)

MSA Limited
Board of Directors
At least 7 Directors

2 EXECUTIVE MANAGEMENT

Executive Management
National Director
Regional Director (VIC/SA/WA)
Regional Director (QLD/NT)
Regional Director (NSW/ACT)
Director of School Improvement
Director of Mission and Life Formation
Head of Business
Head of Governance, Risk and Legal
MSA Senior Leader, Marist Youth Ministry

3 COLLEGE LEADERSHIP

Principals of Marist governed schools
Assumption College Kilmore VIC
Lavalla Catholic College Traralgon VIC
Marcellin College Bulleen VIC
Marist College Ashgrove QLD
Marist College Bendigo VIC
Marist College Canberra ACT
Newman College Perth WA
Red Bend Catholic College Forbes NSW
Sacred Heart College Somerton Park SA
St Gregory's College Campbelltown NSW
St Joseph's College, Hunters Hill NSW
The John Berne School Lewissham NSW

ADVISORY

Committees of the Board
Professional Standards & Child Safeguarding Committee
Finance, Risk and Audit Committee
Succession Planning Committee
Students and their Learning Committee

Committees of Executive
Regional Council VIC/SA/WA
Regional Finance Committee
Regional Council QLD/NT
Regional Finance Committee
Regional Council NSW/ACT
Regional Finance Committee

College Advisory Councils and Finance Committees
(each College has its own Advisory Council and each Council has its own Finance Committee)

MEMBER SCHOOLS

ACT
Marist College Canberra

NSW
All Saints Mariland
Assumption Catholic College Pagewood
Holy Family Catholic School Penrith
John Therry Catholic College Rosemeadow
Marcellin College Randwick
Marian Catholic College Griffith
Marist Catholic College Penshurst
Marist College Eastwood
Marist College Kogarah
Marist Catholic College North Shore
Mount Carmel Catholic College
Parramatta Marist High School
Red Bend Catholic College Forbes
St Francis de Sales Regional College Leeton
St Francis Xavier's College Hamilton
St Gregory's College Campbelltown
St Joseph's College, Hunters Hill
St John's School, Sydney
St Patrick's Marist College, Dundas
The John Berne School Lewissham
Trinity Catholic College, Lismore
Trinity Catholic College Auburn/Regents Park

NT
Lyentyne Apurte Catholic School Santa Teresa
Our Lady of the Sacred Heart Catholic College

QLD
Burdakin Catholic High School, Ayr
Carmel College Thornlands
Chanel College, Gladstone
Good Counsel College Innisfail
Marist College Ashgrove
Marist College Emerald
Mt Maria College, Jindralph
Mt Maria College, Penrith
Notre Dame College, Bells Creek
Our Lady of the Rosary, Kenmore
St Augustine's College, Cairns
St Francis Primary School, Ayr
St Joseph's Primary School, Murgon
St Peter Claver College Riverview
St Teresa's Catholic College Noosaville
St Thomas More Catholic College, Sunshine Beach
Trinity College Beenleigh

SA
Cardijn College Noarlunga Downs
Sacred Heart College Somerton Park

VIC
Assumption College Kilmore
Catholic College Sale
Galen Catholic College Wangaratta
Lavalla Catholic College Traralgon
Marcellin College bulleen
Marist College Bendigo
Marist-Sion College Warragul
Notre Dame College Shepparton
St Patrick's Primary School Kilmore

WA
Bunbury Catholic College Bunbury
Newman College Churchlands
St Marcellin Catholic College Madora Bay
St Joseph's School, Northam

Key Relationships

Marist Relationships

- International Institute of the Marist Brothers
- Province and Provincial Council
- MSA Leadership Team
- Mission and Life Formation Team
- Marist Youth Ministry

Church Relationships

- Catholic Religious Australia
- Bishops
- Association of Ministerial PIPs
- State/Territory Catholic Education R/PIP
- Federations, Commissions, Educational Authorities
- State/Territory Catholic Education Commissions (CSNSW, QCEC, YCEA, CESA, CEWA Ltd, CECAC, CENT)
- National Catholic Education Commission
- Diocesan Directors and Diocesan Education Offices
- Parent Catholic Councils

Regulatory Relationships

- ACNC
- ASIC
- ATO
- Federal, State and Territory Education ministries and statutory authorities

Socio-political Relationships

- Members of Parliament
- Federal and State Ministers

Statutory Related Parties

- * Trustees of the Marist Brothers
- * MASMC Ltd
- * Marist Youth Care Ltd (Marist 180)
- * Australian Marist Solidarity Ltd

During 2025, the Board of MSA Ltd comprised ten directors.

MSA BOARD DIRECTORS



PROFESSOR BR DAVID HALL



MS PAMELA BETTS



DR MICHAEL BEZZINA



DR MICHAEL CASEY



MR DAVID DE CARVALHO



MS ELIZABETH DENNY



MR PETER HOULAHAN



MR NOEL KENNEDY



MR ROSS TARLINTON



MR PETER TURNER

The MSA Ltd Board of Directors;

- set the strategic direction of MSA Ltd
- provide governance of the education ministry's operations
- oversee the operational framework and management of MSA Ltd and associated schools
- appoint, support and guide the National Director/Executive Officer to implement and manage the operational framework of Marist Schools Australia
- provide oversight of MSA Ltd's finance and auditing
- oversee educational standards and effectiveness
- oversee the effectiveness of formation through the education ministry.

The Board of MSA Ltd appoints the National Director to manage the education ministry's operations.

The role of National Director includes;

- putting into action the strategies and policies determined by the MSA Ltd Board
- clearly communicating MSA Ltd's vision and mission, inspiring and empowering others to fulfil MSA Ltd's goals
- appointing leaders and staff to manage and operate MSA Ltd's National and Regional Offices, and each of the twelve MSA Ltd governed Colleges effectively
- ensuring all students have the access to academic and spiritual growth possible from the Marist Schools Australia School Improvement framework.
- ensuring all staff have opportunities for spiritual growth and development

- guiding MSA Ltd towards long-term sustainability, growth, and development, in accordance with all legal requirements

The national office of MSA Ltd is located in Sydney, Australia.

The National Director appoints the Principal of each College. The College Principal has the delegated authority and responsibility of the day-to-day management of the College from the National Director.

Each College Principal reports to the National Director through a Regional Director, who provides additional support. The National Director also provides leadership and guidance to each College Principal including supporting the implementation of strategic and structural matters relating to;

- mission
- governance
- educational quality and standards
- finance
- compliance, and
- risk

Governance of Modern Slavery Risks and Compliance

Accountability for modern slavery risk is held by the Board of MSA Ltd, who ensure that risk in this area is identified and controlled. The Board reviews and approves the MSA Modern Slavery Statement.

The Finance Risk and Audit Committee (FRAC), a committee of the Board, provides oversight and advice to the Board about modern slavery risks.

MSA Ltd has an executive level advisory group, the Modern Slavery Working Group (MSWG), whose role is to ensure modern slavery risks within the education ministry are identified and controlled. In 2025, the MSWG was composed of the National Director, Head of Business and Head of Governance, Risk and Legal. Meetings were held quarterly. Information from these meetings is provided to the FRAC for consideration.

The MSWG liaises with Principals, College business managers, compliance officers and human resources managers, who have responsibility for managing modern slavery risks at the school level. College business managers and HR managers provide supplier and people information to the MSWP for risk analysis.

The MSWG provides advice for the development of modern slavery risk policy, which is submitted to the MSA Ltd board for approval. The MSWG provides advice relating to risk identification and control recommendations for the MSA Ltd risk register.

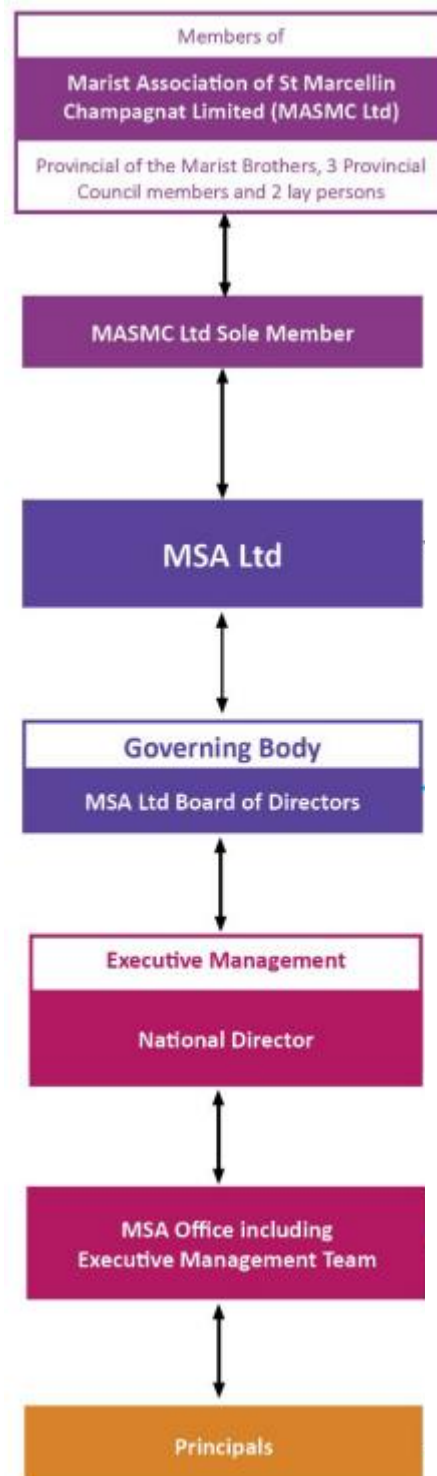


St Joseph's College, Hunters Hills



Red Bend Catholic College, Forbes

Organisational Structure



MSA Ltd provides education for 16,342 students, supported by staff consisting of 1,257 teaching staff and 844 other staff.

MSA Ltd's annual turnover for 2025 was \$497m. Income from the Colleges includes 49% from Government funds and MSA gratefully acknowledges the financial support provided by the Commonwealth, State and Territory governments in recurrent and

capital funding. A further 49% of income is from the support of parents and caregivers through tuition, boarding and other fees. The remaining 2% of income is from investments.

Marist Schools Australia Ltd Operations and Supply Chains

MSA Ltd's primary focus is on Catholic teaching and learning. Its strategic priorities are:

- Formation in Catholic identity and Marist spirituality
- Excellence in Learning, Teaching and Wellbeing
- Stewardship, Governance and Strategic Leadership
- Flourishing Marist Communities

To support these strategic priorities, MSA Ltd's operations include:

- improvements in facilities and resources with over \$65m in capital projects being undertaken in 2025, including major upgrades of boarding facilities in two Colleges to provide further boarding opportunities. Major capital works projects are governed by MSA policy and require approval by the MSA Ltd board at several stages. The selection of builders and contractors for large capital works are subject to assessment of suitability
- use of a diverse network of goods and services engaging contractors and subcontractors for catering, cleaning, gardening, waste management, building, and facilities maintenance tasks
- investment of funds set aside for Long Service Leave and other longer term purposes which are subject to investment policy requirements, including ethical considerations
- development and execution of formation programs for staff and students, including targeted programs and professional development for Principals, Deputy and Middle Leaders
- compliance and risk management, and assistance with handling of College level incidents
- developing data capability and capacity that is purposeful, coherent and aligned to strategic priorities, including proactive financial oversight and the 10 Marist Measures of Excellence.

MSA Ltd Workforce Profile

MSA Ltd employs College leaders, teaching staff, administrative staff and executive management. Through its Colleges, it also engages contractors to support services

including property maintenance, hospitality, security, waste management and uniform supply. It seeks to uphold standards of Catholic Social Teaching through its workforce and to provide to all people a safe environment. Management of the MSA Ltd workforce is in accordance with various Enterprise Agreements and through fair, equitable and transparent contract arrangements.

MSA Ltd Supply Chain

Purchases and engagement of contractors and suppliers are made at a local level due to geographical diversity, to ensure alignment with local market value and optimisation of cost. MSA Ltd exercises control through policy requirements including financial spending limitations for Principals and MSA Ltd approved budgets.

MSA Ltd contracts include terms and conditions relating to modern slavery and standard contracts for major works contain explicit anti-slavery clauses.

Criterion 3: Risks of modern slavery practices in the operations and supply chains

MSA Ltd recognises the risks associated with modern slavery as an integral component of its corporate risk assessment. It has gained a more comprehensive understanding of potential risks and vulnerabilities within its supply chain. Ongoing efforts will prioritise the mitigation of identified risks, enhancement of procurement procedures, and establishment of robust reporting mechanisms.

MSA Ltd has employed the ACAN Category Risk Taxonomy to pinpoint inherent or potential risks of modern slavery linked to significant expenditure categories. This methodology draws upon sources like the Global Slavery Index and the International Labor Organisation (ILO) to identify these risks. Four key factors are also used to determine the level of risk:

- Geography: the country or location where a good is made
- Industry: the sector in which the making of the good or delivering of the service occurred
- Commodity: the raw materials or components that comprise the goods or products
- Workforce vulnerability: such as temporary migrants, women or children known to be employed in specific industry sectors

Building and Construction

The building and construction industry presents a heightened risk for modern slavery due to several factors:

1. **Complex Supply Chains:** Building and construction projects typically involve numerous subcontractors and suppliers, often spanning multiple countries.
2. **Low-skilled and Vulnerable Workforce:** Many tasks within the construction industry, such as manual labour and construction work, require low-skilled workers who may be more susceptible to exploitation.
3. These workers may face language barriers, lack of awareness of their rights, and limited access to legal recourse.
4. **Temporary and Migrant Workers:** Construction projects frequently rely on temporary and migrant labour, who may be particularly vulnerable to exploitation due to their precarious employment status. They may be subjected to debt bondage, passport confiscation, or threats of deportation, making them reluctant to report abuse or exploitation.
5. **Subcontracting Practices:** Subcontracting is common in the construction industry, leading to fragmented supply chains and reduced transparency. A lack of oversight, monitoring and verification of worker conditions contributes to an environment where people are at-risk of modern slavery.
6. **Informal Economy:** In some regions, parts of the construction industry operate within the informal economy, where labour standards are often disregarded, and workers are more susceptible to exploitation and abuse.

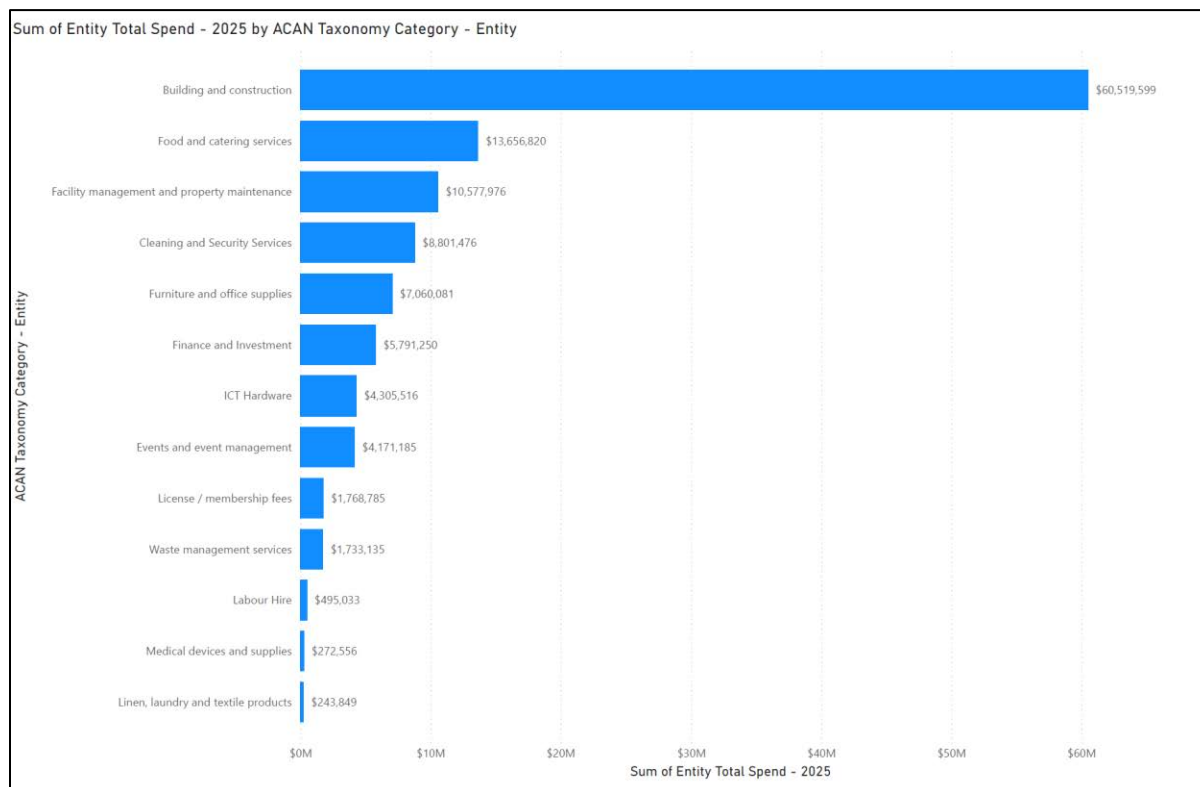


Marcellin College Bulleen

Analysis of Recurrent and Capital Procurement in 2025 Across Our Schools

Risk Category	Supplier Taxonomy	% of Total	No of Suppliers
High	Building and construction	40%	283
High	Cleaning and Security	3%	64
High	Events and event management	2.5%	376
High	Facility management and property maintenance	6%	552
High	Finance and Investment	4%	35
High	Food and catering services	7%	288
High	Furniture and office supplies	3%	676
High	ICT Hardware	1%	98
High	Labour Hire	0.3%	20
High	Linen, laundry and textile products	0.1%	23
High	Medical devices and supplies	0.6%	59
High	Uniforms and PPE	0.25%	77
High	Waste management services	0.5%	28

Supply Chain Risk Distribution (2025)



A thorough analysis of these supply chains has identified the following categories that MSA Ltd would consider high risk including building and construction, cleaning and security, food and catering, facilities management, ICT Software & services, clothing suppliers, IT supplies and services.

Criterion 4: Our actions taken to prevent and manage Modern Slavery Risks

MSA Ltd is committed to the values which underpin Catholic education in the Marist tradition, and to ensuring that our social justice frameworks and modern slavery risk management processes take into consideration all of our stakeholders, including our staff and students. This is directly aligned to the Marist Schools Australia Strategic Plan 2025-2027.

Throughout 2025, MSA was a participating member of the Australian Catholic Anti-Slavery Network (ACAN) and utilised ACAN resources in progressing its anti-slavery program, implementing its Modern Slavery Policy and developing its Anti-slavery Statement. MSA Ltd's membership to this network is integral to its commitment to addressing modern slavery, human trafficking, and forced labour.

Among the invaluable ACAN resources MSA has leveraged are training modules, fact sheets, risk assessment tools, and supplier analysis information.

The following principles guide our modern slavery policy implementation:

- MSA Ltd will not knowingly engage in or support modern slavery practices in any form.
- MSA Ltd will actively strive to identify and eliminate modern slavery practices within its operations, business partnerships, and supply chains.
- Any form of exploitative treatment, abuse of labour rights, or coercive control of workers is unacceptable.
- MSA Ltd will comply with all relevant laws and regulations concerning worker recruitment, remuneration, working conditions, and freedom of association.
- MSA Ltd's purchasing decisions prioritise ethical considerations beyond price, including worker welfare and responsible recruitment practices.
- MSA Ltd expects and supports our suppliers and business partners to assess and address modern slavery risks, enhancing transparency, traceability, and accountability across our supply chains.

During 2025, MSA undertook the following important anti-slavery actions:

2025 Actions
• Modern Slavery Program was included as a topic at the MSA Governed Schools Business Managers conference. • Modern Slavery Working Group continued to meet and included the MSA National Director, Head of Business and Head of Governance, Risk and Compliance • Development of a Risk Appetite Statement to work towards eliminating modern slavery practices in the supply chain and operations of the schools and inclusion of modern slavery risk as one of the MSA macro operational risk areas • Standard form supplier contracts amended to include anti-slavery clauses • Discussions about supplier risk have continued between the MSA Head of Business and MSA School Business Managers during 2025. Procurement, subject to some financial limits, remains a delegated school function and consequently most procurement decisions are made by the Principal in consultation with the school Business Manager • Each of the twelve MSA governed schools provided detailed and considered supplier, spend and workforce data to MSA for risk analysis in Q4 and Q1

For 2026, MSA has maintained its membership with ACAN and supported by this engagement MSA is undertaking the following actions to evolve its anti-slavery program.

2026 Actions
• Modern Slavery Policy and anti-slavery program will continue to be embedded at Board, Executive Management and School level • Expand the Modern Slavery Working Group to include representation of at least two school Business Managers and a business administration assistant • Training at leadership level to be undertaken by MSA directors, MSA executives, College Principals and designated College leaders • Continue to assess and monitor emerging modern slavery risks as part of the MSA macro-operational risk assessment • Continue to collect College supplier, spend and workforce data for risk analysis in Q4 and Q1 annually • Invite high risk suppliers, at least in the building and construction industry, cleaning and catering industry, to participate on Sedex • Review non-standard supplier contracts with a view to including anti-slavery clauses • Include remediation obligations and expectations in contracts with high-risk suppliers that they must notify and consult with MSA Ltd to ensure victim centred remediation processes are implemented to the satisfaction of MSA Ltd. • Expand school communications and engagement activities to include awareness raising about modern slavery and the preventative actions being undertaken by MSA • Continue to participate in the ACAN Modern Slavery Risk Management Program

Further, through ACAN, MSA Ltd's **membership to Sedex - the Supplier Ethical Data Exchange**, has supported engagement with suppliers. Sedex, a global not-for-profit membership organisation, aids businesses in managing and enhancing social and environmental performance within their supply chains.

Through Sedex, businesses access a platform to exchange information and collaborate with suppliers and buyers, fostering ethical and sustainable practices across the supply chain.

As a Sedex member, MSA Ltd continues to leverage a suite of services and tools aimed at mitigating supply chain risks, fostering supplier engagement, and advancing ethical and sustainable business practices.

MSA Ltd's intentions in 2026 for utilising Sedex include:

1. Managing the risk of modern slavery within current supplier relationships
2. Assessing inherent risk against actual risk
3. Screening new suppliers during tender processes and supplier onboarding
4. Gaining visibility further upstream in the supply chains
5. Monitoring and reporting progress regarding the profile of suppliers
6. Inviting high risk suppliers to participate if not already on Sedex

Grievance Mechanism and Remediation Pathways

MSA Ltd's Complaints, Conflict of Interest and Whistleblower Policies are all available on the MSA Ltd website.

In addition, MSA Ltd is committed to providing appropriate and timely remedy to people impacted by modern slavery in accordance with the United Nations Guiding Principles on Business and Human Rights, Commonwealth Modern Slavery Act 2018 – Guidance for Reporting Entities and relevant Australian laws.

Through Domus 8.7, MSA Ltd has access to the Domus 8.7 Remediation Service. Domus 8.7 provides an independent grievance channel, modern slavery assessment, case management, coordination and referrals for people impacted by modern slavery to enable effective remedy.

If and where MSA Ltd is directly linked to modern slavery by a business relationship we are committed to working with the entity that caused the harm to ensure remediation and mitigation of its recurrence.

When indicators of modern slavery practices come to MSA Ltd's attention through any of its channels, staff will contact relevant law enforcement agencies or regulatory agencies and/or Domus 8.7 for an assessment, investigation, action planning and implementation of a remediation process.

During 2025, MSA did not receive any complaints, disclosures or concerns relating to modern slavery.



Criterion 5: Assessment of the effectiveness of our actions

MSA is working to embed the principles in the areas of our business that present risk and will continue to review these actions. MSA is working on measures to assess the effectiveness of our actions. As we mature in this space these measures will also mature.

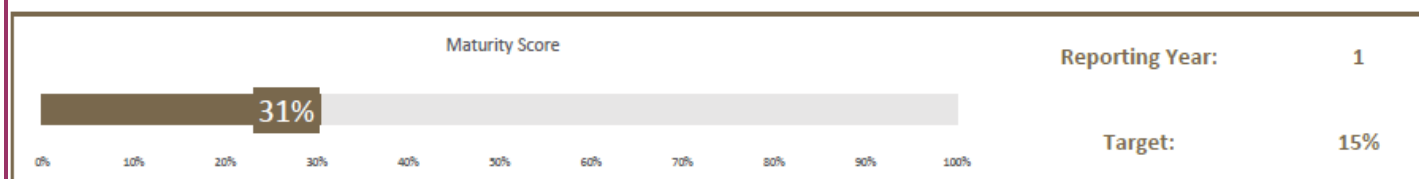
Maturity Assessment

The ACAN Modern Slavery Maturity Assessment provides a score card of MSA Ltd's capabilities to mitigate the risk of modern slavery in its operations and supply chains. The score card is generated from a self-reported Entity Profile Survey generated by ACAN and can be used to set future direction and establish a multi-year action plan.

The maturity score is designed to provide a comprehensive view of MSA Ltd's efforts across key areas of operation, presented as pillars:

1. **Business Process and Governance:** Establishes the overarching structure and policies guiding our efforts, emphasizing the importance of oversight and clear responsibilities.
2. **Operations:** Focuses on internal practices and how effectively we manage risks within our day-to-day activities.
3. **Supply Chain:** Examines our external partnerships and the mechanisms in place to assess and mitigate risks beyond our immediate operations.
4. **Worker Engagement:** Addresses how we manage worker engagement and the standards upheld to prevent exploitation.
5. **Entity's Program and Activities:** Considers broader initiatives and engagements we undertake to combat modern slavery.
6. **Grievance Mechanisms and Remediation:** Evaluates the channels available for reporting concerns and the processes for addressing them.

The maturity score for 2023 was 31%. Actions have been undertaken in 2024 and 2025 to protect against modern slavery. MSA and its Colleges have remained operationally consistent, and as such there have been no material changes that impact the maturity score. A maturity reassessment will be undertaken with the assistance of ACAN in 2026.



Marist Schools Australia - 2023 Analysis by Pillar

Pillar	A. Governance	B. Risk Assessment	C. Risk Management	D. Effectiveness of Actions	Maturity Score 2023
1. Business Process and Governance	39%	47%	25%	17%	32%
2. Operations	40%	38%	15%	14%	27%
3. Supply Chain	0%	80%	0%	0%	20%
4. Worker Engagement	8%	20%	11%	16%	14%
5. Entity's program and activities	75%	20%	50%	20%	41%
6. Grievance Mechanisms and Remediation	70%	60%	40%	30%	50%
Average	39%	44%	24%	16%	31%

Maturity Score 2023 individual scoring by pillar and sub pillar, including averages and total 2023 score

MSA Ltd will adopt the ACAN Baseline Data table in the next reporting period as another measure of our effectiveness.

Criterion 6: Process of consultation with other entities

MSA Ltd holds a quarterly meeting involving the MSA Regional Director, Head of Business, College Principal and business manager at each College to drive operational and finance actions and compliance requirements. This is a structured meeting with a standing agenda, including modern slavery risks, and supplier and workforce data analysis.

MSA Ltd attends monthly meetings which includes other members of ACAN.

Criterion 7: Other relevant information

No other relevant information





Modern Slavery Statement 2025



mater.org.au

The Heart to Heal, The Strength to Grow.

Our spirit is strong, it thrives as we embrace those whom we must always care for.

Our journey has been long, and we will continue to flourish as we open our hearts to those who walk with us.
Always.

Mater acknowledges that our services are provided on Aboriginal and Torres Strait Islander lands and pays respect to their Elders — past, present and emerging.

This artwork concept and narrative was developed by David Williams. David is a proud Wakka Wakka artist at Gilimbai.





This Modern Slavery Statement was approved by the principal governing body of Mater Misericordiae Ltd as defined by the Modern Slavery Act 2018 (Cth) ("the Act") on 7 May 2026.

This modern slavery statement is signed by a responsible member of Mater Misericordiae Ltd Board as defined by the Act.

Patrick Brady
Board Chair

Disclosure Note

This statement has been made on behalf of Mater Misericordiae Ltd ACN – 096 708 922 ABN – 83 096 708 922. This Statement covers all entities owned or controlled by Mater Misericordiae Ltd.

This Statement has been developed in accordance with the Modern Slavery Act 2018 (Cth). Some corporate data and statistics referred to within this report are based on our 2024/2025 Financial Year. However, in order to align our Modern Slavery Statement to other Australian Catholic Anti-Slavery Network (ACAN) members, our supplier spend and modern slavery risk mitigation strategies are reported for the calendar year 1 January 2025 to 31 December 2025.

ABNs

Mater Misericordiae Ltd – 83 096 708 922
Mater Education Limited – 50 148 130 349
Mater Research Ltd – 28 109 834 719
Mater Foundation Limited – 96 723 184 640

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Statement from our Chair

Modern slavery continues to affect millions of people across the globe, and Mater is committed to playing an active role in eliminating this injustice. Guided by our Mission to honour and uphold the dignity of every person, we are dedicated to ensuring that our operations and supply chains reflect ethical, responsible, and human-centred practices.

As a leader in the Queensland Catholic healthcare sector, Mater seeks to move beyond compliance and drive meaningful change. Our ongoing partnership with the Australian Catholic Anti-Slavery Network (ACAN) strengthens our ability to identify risks, build capability, and address the structural inequalities that allow modern slavery to persist.

This is Mater's sixth Modern Slavery Statement, covering the period January to December 2025.

The 2022 Global Estimates of Modern Slavery report found that more than 50 million people were living in conditions of modern slavery in 2021: 10 million more than in 2016. These figures reinforce the importance of working closely and transparently with our suppliers and contractors to manage risks across all Mater subsidiaries.

We will continue to build awareness of our policies, expectations, and corporate objectives, ensuring that our people, suppliers, contractors, and service partners understand and uphold Mater's Values and ethical principles.

Together, we can strengthen our collective capacity to protect human dignity and contribute to a more just and equitable world.

Patrick Brady
Board Chair

About us

Mater is Queensland's largest Catholic for-purpose network of hospitals and healthcare services, bringing together collective expertise across health, education and research with a shared vision to live better lives through improved health and wellbeing.

Mater is committed to a culture of compassion and care inspired by God's mission of mercy to help those in need. In the spirit of Catherine McAuley and her legacy, which has been carried forward by the Sisters of Mercy, we embrace opportunities to provide healing and hope to the communities we serve.

In delivering the healing ministry of Jesus, Mater not only responds to, but actively seeks to support individuals and families disadvantaged by health or social circumstances.



Our Mission, Values and Strategic Vision



Our Mission

We serve together to bring God's mercy to our communities through compassionate, transforming, healing ministries.

Our Values

We honour and promote the dignity of human life and of all creation.
We act with compassion and integrity.
We strive for excellence.

Our Strategic Vision

Empowering people to live better lives through improved health and wellbeing.

Modern slavery risk management initiatives

Mater strives to embed ethical and sustainable practices into every aspect of our business.

Mater's Board and Executive remain committed to complying with the Australian Modern Slavery Act 2018, and to undertaking the roles, responsibilities and accountabilities outlined in the legislation. This statement, pursuant to the Act, sets out the actions taken by Mater to address modern slavery in our operations and supply chain from 1 January 2025 to 31 December 2025.

The practice of healthcare is inextricably linked with the philosophical belief that every human life is valuable and should be respected as such. This belief is enshrined in our Mission and Values, which promote the dignity of human life and all creation. This concept of dignity and respect is also embedded into our policies and procedures, and extends to all our stakeholders, both internal and external.

In 2025, Mater continued its program of work to mitigate the risk of modern slavery within its workforce, operations and supply chain, aligning with reporting criteria 1–7¹ outlined in this statement. As part of this effort, Mater is collaborating with the Australian Catholic Antislavery Network through the Hospital Working Group to identify key risks and engage with suppliers in addressing these challenges.

¹ Seven Mandatory Reporting Criteria as defined under section 16 of the Modern Slavery Act 2018 (Cth).

Reporting criteria 1 and 2

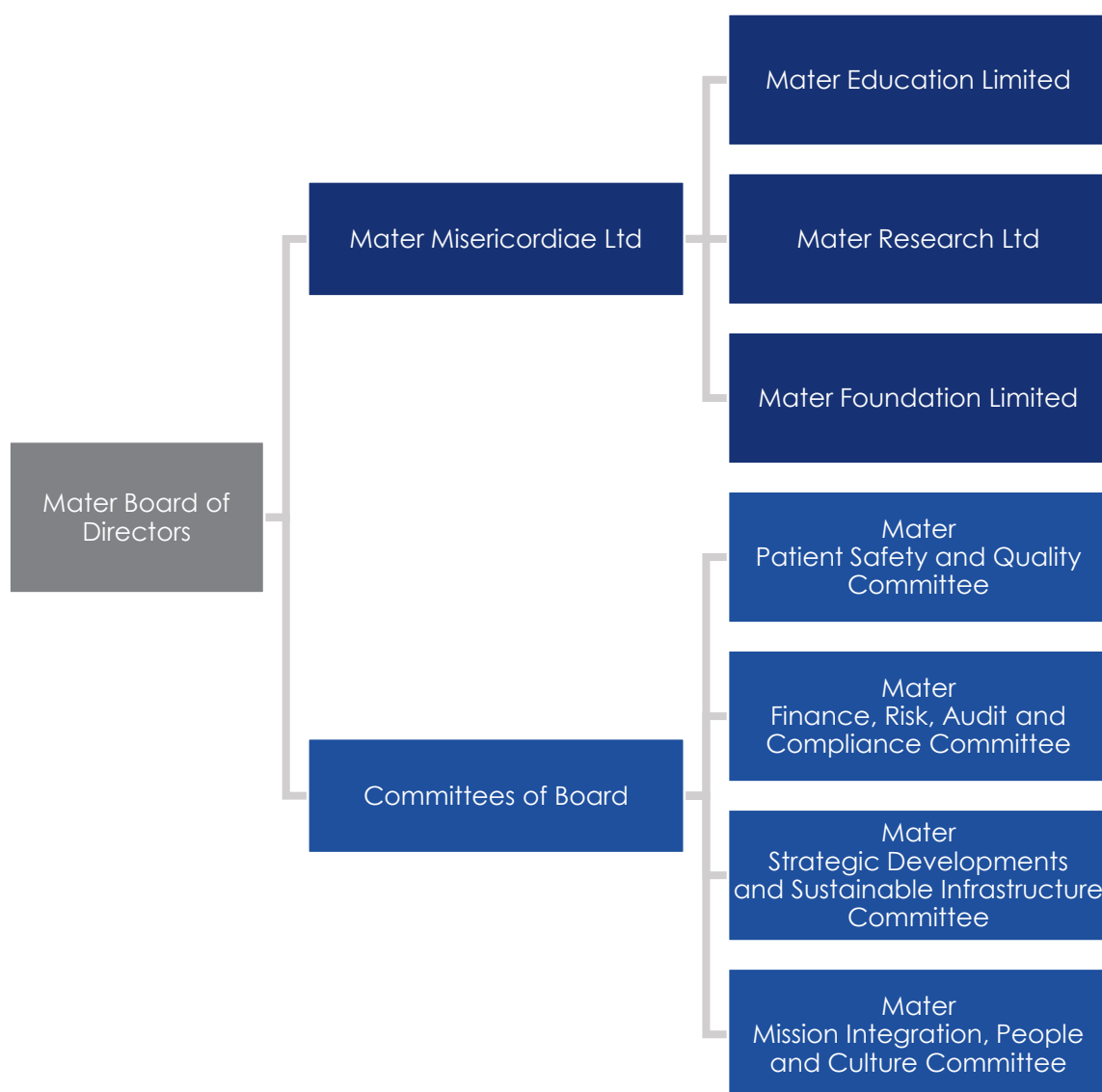
About Mater

Our organisational structure

Mater's organisational structure reflects our commitment to the strategic integration of health, education and research.

In July 2020, a single Board of Governance was established to unify all Mater hospitals and healthcare services across Queensland to further our Vision—empowering people to live better lives through improved health and wellbeing.

Mater head office is located at 14 Stratton Street, Newstead, Queensland (mater.org.au).



Our operations

Mater is an extensive network of public and private hospitals, healthcare, at home services, community services, health centres and related businesses, as well as a nationally accredited education provider, a world-class medical research institute and a philanthropic foundation.



Mater Health

Mater Health comprises 11 hospitals across Queensland, as well as a range of healthcare services. These services combine to help Mater offer comprehensive healthcare that addresses unmet community needs.



Mater Education

Mater Education is a nationally accredited, hospital-based independent Registered Training Organisation—the only one of its kind in Queensland. It offers a range of courses for students and further education opportunities for highly experienced practicing clinicians.

By combining our collective expertise and resources across health, education and research, we are able to deliver new services in new ways and continue to fulfil our Mission to meet the healthcare needs of our community by delivering safe, high-quality, compassionate care.

Mater's Board and Group Chief Executive Officer have governance over Mater Health, Mater Education, Mater Research and Mater Foundation in addition to corporate services.

Mater Research

Mater Research is an internationally recognised leader in medical research, connecting its findings from bench to bedside and translating medical research into clinical practice to deliver better outcomes for our patients and the wider community.



Mater Foundation

Mater Foundation raises funds by engaging the community to partner with Mater to improve the health of Queenslanders through fundraising and philanthropic opportunities.

Mater at a glance

Mater Private Hospital Townsville

Mater Private Hospital Mackay

Mater Private Hospital Rockhampton

Mater Private Hospital Bundaberg

Mater Private Hospital Redland

Mater Private Hospital Brisbane
Mater Hospital Brisbane
Mater Mothers' Private Brisbane
Mater Mothers' Hospital

Mater Hospital Springfield
Mater Private Hospital Springfield

Mater Private Hospital Gold Coast



Figures sourced from Mater's 2024/25 Annual Review.

Our supply chain

Mater's procurement and supply chain activities are delivered through a centre-led operating model in partnership with our divisions. We seek to undertake business with suppliers and contractors who share Mater's Values and are environmentally and socially responsible.

Our procurement policies and procedures establish a robust governance framework, embedding due diligence processes to identify and mitigate risks related to modern slavery, human rights violations, and environmental impact. These principles are integrated into all tendering and contracting activities to ensure compliance with legislative and ethical standards. Mater engages in procurement across a wide range of categories, including clinical, non-clinical supplies and services, and information communication and technology supplies and services. In addition, key areas such as Development and Property oversee the procurement of construction, asset management, and maintenance services, while Mater Foundation manages the ethical sourcing of equipment and fundraising materials.

We apply risk-based sourcing strategies and contracts tailored to the complexity and value of each procurement activity, ensuring stringent supplier vetting and contractual obligations. All suppliers and contractors must adhere to Mater's contractual terms, which explicitly reference modern slavery prevention, ethical labour practices, environmental sustainability, and our Supplier Code of Conduct.

By prioritising ethical sourcing and supplier accountability, Mater remains steadfast in its commitment to eradicating modern slavery and fostering a socially responsible supply chain.

The below information provides a snapshot of Mater's business and procurement activities.



**Mater is a member of the Catholic Negotiating Alliance (CNA), a network of Catholic health care facilities authorised by the Australian Competition and Consumer Commission with suppliers*

What we buy – clinical

Our largest supply category and spend is clinical, covering medical devices and supplies. As provided in the below table, the clinical category comprises medical and surgical consumables, prostheses, pharmacy and medical equipment.

Clinical / Direct			
Medical and surgical consumables	Pharmacy	Prosthesis	Medical equipment
- Anaesthesia consumables - Cardiovascular consumables - Custom sterile - Dental consumables - Dialysis consumables - Hygiene care and products - IV and arterial administration - Medical aids consumables - Medical consumables - Medical operator protection - Medical research - Needles and syringes - Nutrition and feeding - Orthopaedic consumables - Pathology consumables - Miscellaneous consumables - Examination/monitoring - Radiology and x-ray - Respiratory consumables - Resuscitation consumables - Surgical consumables - Sutures - Wound care - Burrs and blades - Sterile instruments	- Pharmaceuticals and drugs - Cytotoxic pharmaceuticals - Pharmacy consumables	- Prosthetics - Cardiovascular - Prosthetics - Craniofacial - Prosthetics - ENT - Prosthetics - General - Prosthetics - Gynaecology - Prosthetics - Maxillary-Facial - Prosthetics - Neurosurgery - Prosthetics - Ophthalmic - Prosthetics - Orthopaedic - Prosthetics - Orthotics - Prosthetics - Plastics - Prosthetics - Spinal - Prosthetics - Urology - Prosthetics - Vascular - Prosthetics - Gastroenterology - Loan kit service fees	- Medical bed and mattresses - Diagnostic equipment - Radiology and x-ray equipment - Infant and maternity care - Infusion pumps - Monitors and monitoring systems - Patient and shower trolleys - Dental equipment - Pathology equipment - Resuscitation equipment - Respiratory equipment - Other medical equipment

What we buy – non-clinical

The non-clinical categories include facilities management, business services, utilities, hospitality and medical equipment and repairs. An overview of the products and services within the non-clinical category is listed below.

Indirect				
Facilities management	Business services	Utilities	Hospitality	Medical Equipment and Repairs/Mtce
- Furniture, fixtures and equipment - Equipment hire (non-clinical) - Facilities supplies - Health and safety - Pest control - Airconditioning and heating - Equipment - Signage - Waste management - Hardware supplies - Painting supplies - Plumbing supplies - Electrical supplies - Fire safety supplies - Landscaping supplies - Locksmith services - Cleaning and domestic services - Pest control services - Electrical services - Plumbing services - Carpentry services - Flooring services - Security services - Painting services - Window and door services - Automatic door services - Landscape and ground services - Fire services - Lift services - Swimming pool maintenance - Water treatment services - Facilities/buildings and other engineering services	- Administration expenses - Advertising and promotions - Audit fees - Business expenses - Fleet - Freight and courier - Insurance - Interpreter services - External legal services - Newspapers and journals - Subscriptions and memberships - Office equipment - Stationery supplies - Patient ambulance transport - Printing - Recruitment - Temporary labour, including admin, nursing, medical, IT and other - Consultants (excluding Engineers, Architects, IT, etc.) - Training and education - Travel and accommodation - Uniforms - Printing services - Postage - Taxi/ride share - Salary packaging - Document management and storage - Allied Health - HR services (Police checks)	- Electricity - Coal - Gas – clinical - Gas – non-clinical	- Beverages - Catering services and supplies - Food - Food service and consumables - Housekeeping - Consumables - Linen - Laundry services - Chemicals - Supplements	- R&M Medical equipment - R&M Radiology - R&M Pathology - Equipment lease and rental - M&S lease and hire equipment

What we buy – Information, Communication and Technology

An overview of the products and services within the Information, Communication and Technology category is listed below.

Information, Communication and Technology			
Networks and Communications	Hardware	Software	Services
▪ Mobile voice and data ▪ Mobile phones ▪ Mobile phone maintenance and support ▪ Fixed Data (WAN) services ▪ IT network, infrastructure and hardware ▪ Hardware maintenance and support ▪ Cloud and Cloud storage	▪ Desktop/laptop/tablets and computing, including support ▪ Audio visual equipment ▪ Audio visual equipment maintenance and support ▪ Printers and multi-function devices (MFDs) ▪ Printers and MFDs maintenance and support	▪ Software licensing – clinical ▪ Software maintenance and support – clinical ▪ Software licensing – non-clinical ▪ Software maintenance and support – non-clinical	▪ Managed services ▪ Professional services and consultancy ▪ Infrastructure as a service ▪ Platform as a service ▪ Hardware as a service ▪ Software as a service

Supplier Code of Conduct

Mater is dedicated to the ethical and responsible engagement of suppliers, ensuring they align with our Values and uphold the highest standards of integrity. As part of this commitment, all suppliers must comply with Mater's Supplier Code of Conduct.

In 2022, we reinforced our Supplier Code of Conduct (Code) by strengthening its provisions and integrating it as a contractual requirement across our legal agreements. This further solidifies our expectation that suppliers not only adhere to the Code but also apply its principles throughout their own supply chains. The Supplier Code of Conduct is publicly available on our website, and new suppliers are assessed based on their compliance with Mater's ethical, legal, and quality standards. We expect our suppliers and their supply chains to reflect our Values and adhere to the following principles:

Human rights compliance: Upholding the standards outlined in the International Bill of Human Rights and the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work.

Modern Slavery prevention: Proactively identifying and mitigating risks of modern slavery within their operations and supply chains.

Legal and ethical labour practices: Ensuring full compliance with all laws related to forced or involuntary labour, child labour, discrimination, and security practices. This includes safeguarding employees' rights to leave their workplace at the end of their shift and to resign with reasonable notice.

Freedom of association and collective bargaining: Respecting workers' rights to join trade unions of their choice and to engage in collective bargaining.

By embedding these principles in our supplier relationships, Mater reinforces its unwavering commitment to ethical sourcing, human rights, and sustainable business practices.



Reporting criteria 3

Modern slavery risks in supply chain, operations and workforce

Mater is committed to ensuring our procurement practices are transparent, fair and responsible, upholding high standards of integrity and honesty that align with our Values. We also recognise that instances of modern slavery are often complex and hidden.

For Catholic entities like Mater, modern slavery risks are categorised in line with ACAN Category Risk Taxonomy. This classification standard determines the risk consequence (evaluated as the level of severity for potential or actual harm to people) for each spend category.

The ACAN Category Risk Taxonomy is based on sources including:

- the Global Slavery Index
- the International Labor Organisation (ILO), including definitions of modern slavery
- the Bureau of International Labor Affairs (ILAB), U.S Department of Labor
- the Global Child Forum and UNICEF.

The five key factors used to determine the level of risk inherent to our supply chain, operations or people are:

Geographic location: the country or location where a good is made or service is delivered. While Mater predominantly uses Australian-based suppliers, we acknowledge that some goods and services may come from countries other than where the suppliers' headquarters are based.

Industry: the sector in which the making of goods or delivery of service occurred, recognising that specific industry sectors present a higher risk.

Commodity/product: the raw materials or components that comprise the goods or products. Certain products and commodities are deemed high-risk according to the US Department of Labor's 2018 List of Goods Produced by Child and Forced Labor, the Global Slavery Index (GSI) and other international guidance materials.

Workforce profile: the type of labour involved in the production of our goods and services, particularly where low-skilled, vulnerable, or migrant labour was used, or where the work was deemed as '3D' (dirty, dull or dangerous).

Domus 8.7 trends, cases, and risk intelligence: identified through the Domus 8.7 remediation service, including grievances and remediation insights relevant to category and risk to workers.

Supply chain

We understand that Mater suppliers could be directly linked to modern slavery practices through their own supply chains.

Mater's analysis of its procurement categories has identified suppliers across high, medium, and low-risk levels using the ACAN taxonomy. Mater, both independently and in collaboration with the ACAN Hospital Working Group, conducts supplier assessments to promote ethical sourcing practices and to uphold social responsibility across its supply chain.

Mater has taken steps to gain a better understanding of potential modern slavery risks with its procurement spend mapped using ACAN's Category Risk Taxonomy to assist in identifying supplier risk prioritisation and engagement activities.

Classification

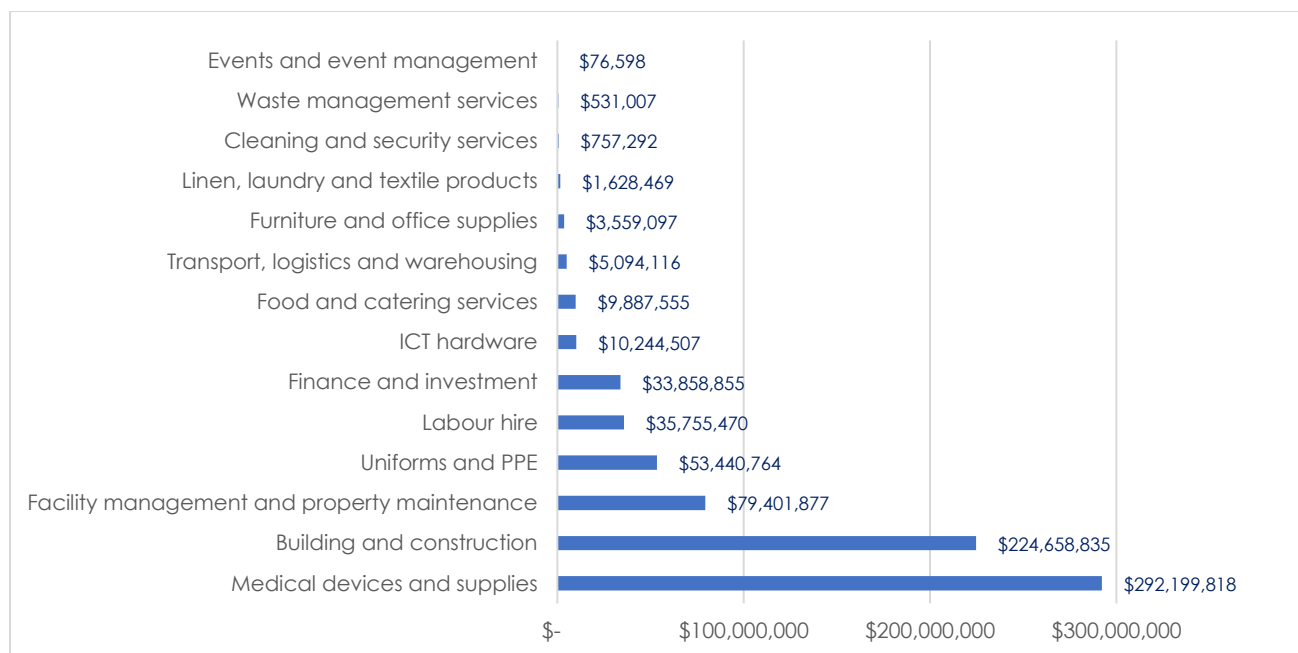
The types of goods and services purchased by Mater have been classified in the below table by level of risk.

High risk	Medium risk	Low risk
▪ Building and construction ▪ Cleaning and Security ▪ Events and event management ▪ Facility management and property maintenance ▪ Finance and Investment ▪ Food and catering services ▪ Furniture and office supplies ▪ ICT Hardware ▪ ICT Software and network services - offshore ▪ Labour Hire ▪ Linen, laundry and textile products ▪ Medical devices and supplies ▪ Transport, logistics and warehousing ▪ Uniforms and PPE ▪ Waste management services	▪ Advertising and marketing ▪ ICT Software and network services - onshore ▪ Utilities ▪ Fleet management, consumables and maintenance ▪ Travel and accommodation ▪ Print / Mail provider	▪ Professional services ▪ Financial expenses ▪ Government and agency fees ▪ Licence / membership fees

Category spend 2025

Mater procures goods and services from both domestic and international supply chains with a procurement spend of approximately \$1.1 billion across 4,232 suppliers and 20 broad procurement categories aligned with ACAN's Risk Taxonomy for 2025.

Mater's 2025 spend analysis by ACAN Taxonomy Category is depicted below:



Operations

Mitigating operational risks related to modern slavery is a priority for Mater, and we take a proactive, comprehensive approach to addressing these risks across our operations. This includes conducting due diligence and working closely with suppliers to ensure adherence to ethical labour standards. Mater has established robust policies, training programs, and reporting mechanisms to empower employees and suppliers to identify and report potential signs of modern slavery.

We also embed contractual obligations within supplier agreements, address areas of non-compliance, and provide support for remediation where required. Through these measures, Mater promotes accountability and transparency, ensuring our operations and supply chain align with global human rights standards and reflect our strong commitment to eliminating modern slavery.

Our People

With 11,089 Mater People and more than 600 volunteers across the state, Mater has policies and procedures in place that support a safe and fair work environment for all. To further strengthen our workforce practices, Mater also engages agency medical and nursing personnel under contract agreements that include obligations to mitigate environmental and modern slavery risks.

Mater remains committed to addressing modern slavery by continually monitoring and reporting on training and awareness initiatives. Since introducing modern slavery training modules and awareness activities for new employees, we have trained more than 1,200 key personnel, including Mater's new Group Chief Executive Officer, Board members, and staff in procurement and purchasing roles, who successfully completed training statewide in 2025.

Additional efforts to raise awareness were led by the Chief of Mission, who introduced a modern slavery segment into the Welcome Day induction program. In 2025, a total of 870 new starters attended the induction and were encouraged to complete the modern slavery training.

Reporting criteria 4

Actions taken to assess and address risk

ACAN supplier engagement

Mater follows the ACAN supplier engagement process, which provides supplier engagement support and data, enabling a systematic and comprehensive supply chain risk assessment. In 2025 the ACAN Modern Slavery Risk Management Program launched a new purpose-built data management platform - ROTA. ROTA centralises the ACAN Risk Management Program framework and facilitates supplier performance evaluation and engagement, including:

1. Evaluation of the modern slavery risk within operations and supply chains, using the ACAN Risk Taxonomy.
2. ACAN Supplier Survey to identify supplier revenue, number of employees, countries of origin for goods sourced overseas, workforce contractual arrangements and Supplier Ethical Data Exchange (Sedex) membership status.
3. Supplier education on modern slavery and risk management in key areas, including cleaning, building and construction, procurement of labour, labour hire and services, sourcing goods from overseas, grievance mechanisms and remediation.
4. Onboarding suppliers to Sedex, which requires a business address, contact details and goods or services provided.
5. Sedex Self-Assessment Questionnaire (SAQ) helping suppliers to evaluate their practices against established standards and identify areas for improvement.
6. Desktop risk review to identify key actions required from targeted suppliers.
7. Enhancement of supplier screening using Know Your Client (KYC) intelligence software.
8. Corporate Social Compliance Audits providing a point in time, objective and independent verification process of supplier alignment with local laws and worker wellbeing standards.
9. Domus 8.7 Index assessment on selected suppliers in high-risk categories.
10. ACAN Prequalified Supplier Directory - a list of preferred suppliers accessible to Catholic organisations.

Other 2025 achievements

As a member of ACAN, Mater follows ACAN risk management program, striving to continuously improve its approach to modern slavery. A range of activities continued over the past 12 months, all focused on further mitigating modern slavery risks. Actions undertaken and artefacts developed or maintained during 2025 include:

Supplier resources

- A dedicated supplier page was added to Mater's internet site, providing access to Mater's Modern Slavery Statement, training and development links, the Supplier Code of Conduct, and other relevant information.

- Mater's Procurement intranet site was updated with the latest Modern Slavery Statement to ensure easy access for staff.

Supplier engagement and assessments

- Mater encouraged suppliers to complete a modern slavery survey and join Sedex —a global online platform that supports environmental and modern slavery risk mitigation and information-sharing across Mater and other ACAN entities.
 - In 2025, 94 suppliers participated, completing 148 site self-assessments: 45 sites were identified as high-risk, 75 medium-risk, and 60 low-risk.
- Suppliers were invited to attend webinars to deepen their understanding of modern slavery legislation and risk indicators.
- Continued engagement with suppliers during procurement tenders, with environmental and social evaluation criteria incorporated to support informed risk identification and decision-making.

Clinical and operational safeguards

- The Mater Advocacy and Protection Unit embedded prompts in existing Domestic and Family Violence screening tools to support the identification of modern slavery risks during clinical presentations.

Training and awareness

- Mater People continue to have access to refreshed modern slavery training, which includes the following three modules:
 - Modern Slavery – Business Relevance
 - Modern Slavery – Grievance Mechanisms and Remedy
 - Modern Slavery – Modern Slavery 101
- In 2025, Mater's new Group Chief Executive and several Board members—along with many other Mater People—completed this training.
- An additional 870 new starters who attended Welcome Day induction in 2025 were introduced to modern slavery awareness and encouraged to undertake the training modules.

ACAN collaboration and risk monitoring

- In 2025, ACAN's former Aged Care and Health Working Group was re-scoped as the Hospital Working Group. The establishment of this group enables members to collaboratively share information and undertake supplier risk assessments as a group activity, relevant to the sector. Members include Calvary, Cabrini, St Vincent's, an ACAN representative and Mater. During 2025, Mater participated in meetings with suppliers which included comprehensive discussion on supply chains risks.
- The ACAN Hospital Working Group conducted supplier risk assessments to better understand sector-specific operational and supply chain risks. These assessments continue to be tracked via an online tool developed by ACAN.
- Mater's Modern Slavery Liaison Officer and ACAN's Program Director commenced a desktop risk review of one of the largest suppliers in the high-risk building and construction category.
- Mater utilised Sedex via ACAN during the reporting period and completed its annual self-assessment across 15 key risk areas.

- Using the ACAN Risk Taxonomy, Mater identified 50 high-risk or high-volume suppliers for onboarding to the Sedex platform. Once onboarded, suppliers complete a Self-Assessment Questionnaire (SAQ), which generates their risk score.

Governance and compliance

- Modern slavery continues to be recorded as a compliance obligation within Mater's Risk Management System and Register.

Domus 8.7

Mater is a founding member of Domus 8.7, established as an agency of the Catholic Archdiocese of Sydney in 2020 as a key element of the ACAN Modern Slavery Risk Management Program. This collaborative approach to remediation is aligned with the Modern Slavery Act and Catholic Social Teaching which are centred on the needs, wellbeing and empowerment of people impacted.

Domus 8.7 provides Mater with:

- resources that enable us to listen to workers (grievance channel)
- a 24/7 careline for workers on our sites, staffed by professional counsellors
- direct support to people impacted by modern slavery
- guidance and technical assistance to prevent, identify and remediate modern slavery
- a documented process to assess if an organisation has caused, contributed to or is directly linked to modern slavery and modern slavery indicators.

Domus 8.7 empowers people impacted by modern slavery to have choice and control over what forms of remediation are meaningful to them and to engage safely with business/supply chain actors. Supports may include:

- modern slavery indicator assessment
- needs assessment, case coordination, response and remediation planning
- referrals to community, social services, unions
- transport, accommodation, financial and food support
- legal support, referrals, accompaniment and advocacy
- job training, retraining and redeployment
- accompaniment and advocacy to engage with government and law enforcement agencies
- opportunities to contribute lived expertise to improve modern slavery responses.

The Domus 8.7 Advisory Committee Members also include a person with lived expertise, Mr Moe Turaga. Domus 8.7 is a registered charity with the Australian Charities and Not-for profits Commission (ACNC) and is an endorsed Public Benevolent Institution with Deductible Gift Recipient (DGR) status. ABN 244 72497189

Reporting criteria 5

Effectiveness assessment

Mater understands the importance of assessing the effectiveness of the actions we are taking to address modern slavery risks.

As we present our sixth Modern Slavery Statement, we acknowledge the importance of continuous improvement and the need for a refreshed approach. Mater has continued to work closely and collaboratively with ACAN, which remains supportive of Mater's activities and progress. Regular webinars, open forums and monthly ACAN Modern Slavery Working Group meetings are attended to keep abreast of the latest news and developments in this sector.

The appointment of a new Modern Slavery Liaison Officer who is a member of Mater's Risk and Assurance team has contributed to further strengthening risk-based approaches and modern slavery risk mitigation initiatives.

Continuous improvement

Collaboration is at the heart of accelerating progress. This also includes opportunities to comparatively measure social, environmental and governance (business ethics) risks and actions with peers in our network.

In its foundational stages, Mater used an internally devised ACAN framework to measure progress. This bespoke approach reflected the unique priorities, constraints, and practices across Catholic organisations.

In 2025, the ACAN Program adopted a globally recognised risk measurement system through SEDEX. This aligns reporting entities with a methodology that combines global data about risks in different countries and industries with site-specific information from the SEDEX platform. SEDEX regularly updates the methodology to ensure it is aligned with new and emerging risks. Therefore, completion of the SEDEX SAQ completed by Mater is a substantial measure of continuous improvement year on year. Below is an explanation of how scoring is calculated using the SEDEX SAQ and Mater 2025 risk scores and management controls that will serve as our benchmark for continuous improvement.

Explanation of Scoring

Combined Risk Score 4.2/10 (medium risk) - calculated from inherent risk and site characteristics, adjusted for management controls and audit results. The score is broken down by pillar and highlights strengths and opportunities to focus our efforts on key areas that drive ethical and sustainable practices.

Inherent Risk Score 3.5/10 (low risk) - predicts potential risks based on a country/region, and sector. Spanning all four pillars, this score is broken down by topics. It can be used as a baseline to identify and prioritise areas for improvement in operations. This score shows the natural risks of doing business in a specific country or sector. It does not include any details about individual sites.

Labour Standards Pillar - assesses location and industry factors that could increase labour risks, such as vulnerable worker populations or high rates of workplace violations.

Health and Safety Pillar - considers regional and industry-specific health and safety risks, including local regulations and industry accident rates.

Business Ethics Pillar - assesses industry and location risks related to unethical practices, such as high corruption levels or weak regulatory oversight.

Environment Pillar - examines the environmental impact of the site's industry and location, such as pollution levels or resource use that may create regulatory or compliance risks.

Mater's scores broken down by pillar, resulting from the SEDEX SAQ are included below:

Management controls 3.1/5 (Good) View SAQ				
Measures suppliers' risk management (0–5, with 5 as best) to assess effectiveness and target improvements.				
Labour standards ⓘ 2.9/5 Moderate	Health and safety ⓘ 4.1/5 Advanced	Business ethics ⓘ 3.4/5 Good	Environment ⓘ 1.3/5 Fair	
Section title	Points available	Points achieved	% of points achieved	Score
Profile	5	2	40%	2.0 (Moderate)
Workplace impact	5	5	100%	5.0 (Advanced)
Management systems	21	18	85.7%	4.3 (Advanced)
Freely chosen employment	37	29	78.4%	3.9 (Good)
Freedom of association	6	6	100%	5.0 (Advanced)
Health and safety	98	81	82.7%	4.2 (Advanced)
Children and young workers	10	5	50%	2.5 (Moderate)
Wages	23	12	52.2%	2.6 (Moderate)
Working hours	21	8	38.1%	1.9 (Fair)
Discrimination	41	15	36.6%	1.9 (Fair)
Regular employment	15	5	33.3%	1.7 (Fair)
Discipline and grievance	29	18	62.1%	3.1 (Good)
Environment	43	12	27.9%	1.4 (Fair)
Business ethics	9	8	88.9%	4.5 (Advanced)

Reporting criteria 6

Process of consultation with entities owned or controlled

The Mater Board governs the wholly owned subsidiaries, Mater Education Limited, Mater Research Ltd and Mater Foundation Limited, with representatives within these subsidiaries committed to mitigating modern slavery risks as members of the cross-functional Anti-Slavery Working Group.

The information contained in this statement relates to all Mater owned subsidiaries, including supplier data. Corporate services and processes such as onboarding of new employees, training, vendor management, etc. apply to all subsidiaries, their staff and vendors.

Subsidiary Executives are included in Mater Group Leadership Team and contributed to the review of this statement.

To raise awareness of our efforts to combat modern slavery, a copy of Mater's Modern Slavery Statement is shared with the Archbishop of Brisbane and Bishops of Rockhampton and Townsville.

Reporting criteria 7

Patient and Community

Mater acknowledges that people at risk of, or experiencing, trafficking or slavery practices may access its public and private health services. As Australia's largest provider of maternity care, Mater is uniquely positioned to identify indicators of forced marriage and forced surrogacy—currently the most common modern slavery referral types nationally.

Mater's clinical presence across eight regions of Queensland provides important reach into communities where slavery-like practices may occur, including areas with seasonal and mobile agricultural workforces connected to the Pacific Australia Labour Mobility (PALM) scheme. Mater also plays a significant role in supporting culturally and linguistically diverse communities, providing free, high-quality healthcare to refugee and asylum-seeking populations through the Mater Refugee Complex Care Clinic (MRCCC) since 2002.

Through consultation with the Australian Catholic Anti-Slavery Network (ACAN) in 2023, Mater deepened its understanding that experiences of trafficking or slavery are often misidentified as domestic and family violence (DFV) in clinical settings. This insight highlighted DFV programs as an important pathway for improving awareness and identification of modern slavery and human trafficking.

In 2025, Mater's Advocacy and Protection (MAP) Unit adapted the Queensland Government's DFV Common Risk and Safety Framework (CRaSF) to incorporate prompts that help clinicians recognise indicators of trafficking and slavery practices. Mater is the only health provider in Queensland to embed a modern slavery dimension into the CRaSF tool. This resource is accessible to more than 11,000 Mater People via the organisation's document library and learning platforms and can be uploaded into clinical and legal records to support continuity of care.

To clarify clinical and psychosocial indicators, Mater drew on United Nations guidance on identifying victim-survivors and reporting concerning activity. The adapted CRaSF also outlines safe referral pathways, acknowledging that some individuals may be reluctant to engage with law enforcement due to fears of retaliation or lack of familiarity with legal processes. These alternative pathways allow individuals to access support without overstating the level of therapeutic intervention that Mater can provide.

While Mater does not currently operate a dedicated clinical or therapeutic service specifically for modern slavery or human trafficking, awareness and response considerations have been embedded into Mater's statewide DfV framework since 2023. This includes integration into policy, screening practices, documentation, guidelines, consultation processes, and education initiatives, all supported by the MAP Unit.

Mater's network of Pastoral Carers also contributes to these efforts by regularly incorporating education on modern slavery and human trafficking into their professional development programs, providing an additional layer of awareness and responsiveness across the Mater health system.

Mater remains committed to internationally recognised human rights frameworks, standards and goals, including:

- International Bill of Human Rights
- International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work
- UN Guiding Principles on Business and Human Rights
- UN Sustainable Development Goals – including Target 8.7 to eradicate modern slavery
- National Catholic Safeguarding Standards
- Queensland's 10 Child Safe Standards and Universal Principle.



Patrick Brady
Board Chair

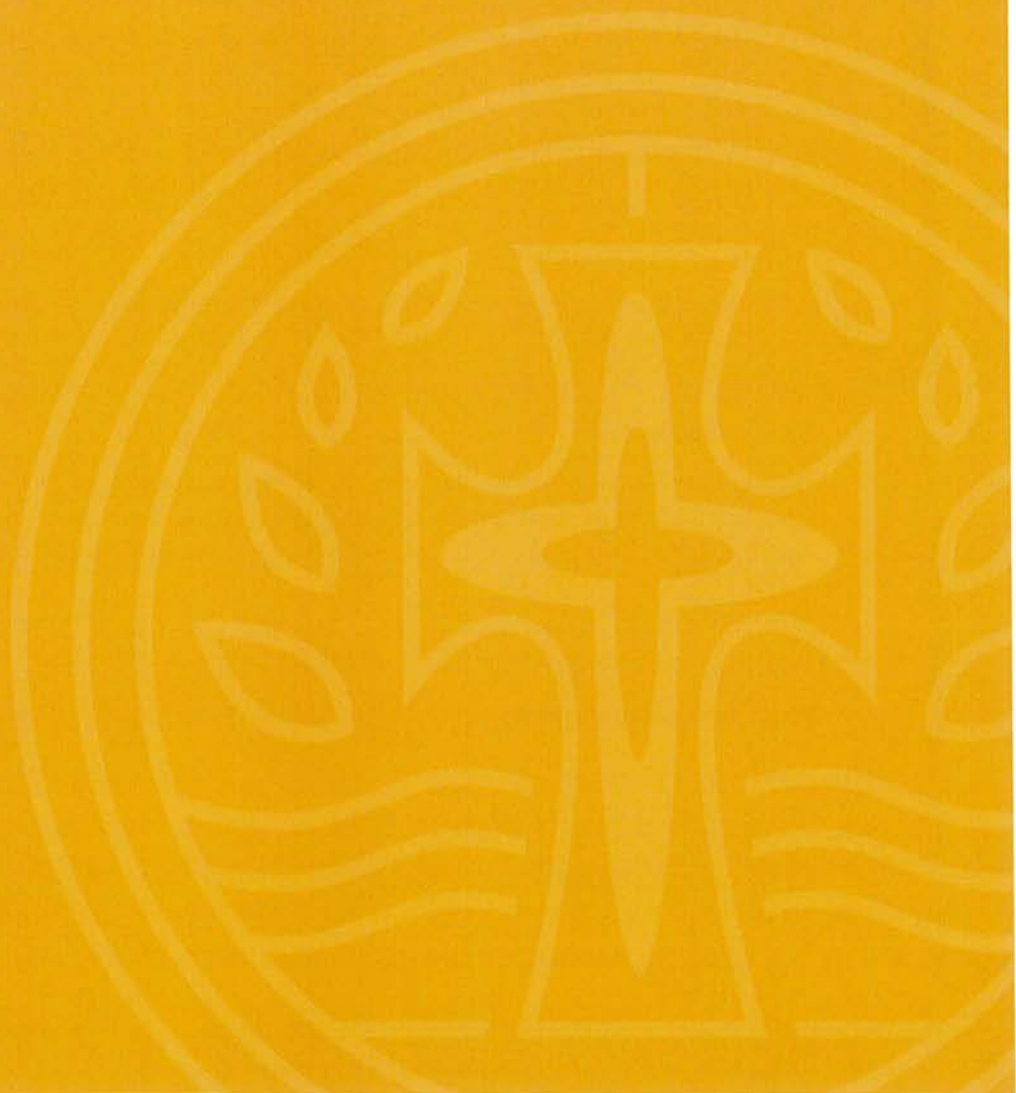


Mercy
Education

Modern Slavery Statement

1 January – 31 December 2025

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Acknowledgement of Country

Mercy Education acknowledges all Aboriginal and Torres Strait Islander peoples as the Traditional Custodians of Country and the lands on which our National Office and 13 Catholic schools stand.

We pay our respects to Elders past and present, and their continuing connection to land, waters, skies, and community. We recognise Aboriginal and Torres Strait Islander peoples as the first educators on Country who, for generations, have shared and preserved their knowledges, stories and wisdoms.

Mercy Education reaffirms its commitment to the ongoing journey of reconciliation, and to deepening our collective understanding of First Nations histories, cultures and perspectives.

Disclosure note

This Modern Slavery Statement applies to Mercy Education Ltd. The use of the title 'Mercy Education' within this document refers to 'Mercy Education Ltd.'

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ABN 69 154 531 870 | **ACN** 154 531 870

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Statement, Approval & Signature

Statement from our Board Chair

At Mercy Education, we are committed to upholding the dignity and freedom of every individual, guided by our Catholic and Mercy values of Compassion, Justice, Hospitality, Service, Respect and Courage.

In 2025, we remained committed to assessing and addressing modern slavery risks in our operations and supply chains. This includes reporting on our continuous improvement efforts and engaging with the broader Mercy community.

This statement covers Mercy Education's 2025 anti-slavery actions and effectiveness measures that demonstrate our compliance with the *Modern Slavery Act 2018* (Cth).

This Modern Slavery Statement was approved by the Mercy Education Board, which is the principal governing body of Mercy Education Ltd as defined by the *Modern Slavery Act 2018* (Cth) ("**the Act**") on 26 June 2026.

This Modern Slavery Statement is signed by the Chair as the responsible member for Mercy Education Ltd as defined by the Act.



A handwritten signature in black ink, appearing to read 'Audrey Brown'.

Audrey Brown

Board Chair

Criteria 1

About Mercy Education Ltd

Mercy Education Limited (**MEL**) is a company limited by guarantee which leads, governs and supports thirteen Mercy Colleges across Victoria, South Australia and Western Australia.

Continuing the rich history and tradition of these Colleges founded by the Sisters of Mercy, we are inspired by the ministry of Venerable Catherine McAuley and the work of the Sisters in being living witnesses of God's mercy in the world.

Our vision is to continue to enrich a dynamic community of Catholic Colleges committed to the spirit of Mercy.

This educational ministry is one of several not-for-profit works of Mercy Ministry Companions (**MMC**), a Ministerial Public Juridic Person (**MPJP**) operating throughout Australia.

This Modern Slavery Statement covers our 13 Catholic Colleges spanning across three states. This Statement does not cover schools affiliated with Mercy Education who receive support and professional development whilst operating within a Mercy framework. Such schools have their own governance structures that either do not meet the threshold for reporting under the Act, or who may report as part of another larger entity. Mercy Education Governed Colleges are as follows:

Victoria

Academy of Mary Immaculate, Fitzroy
Catherine McAuley College, Bendigo
Emmanuel College, Warrnambool
Mount Lilydale Mercy College, Lilydale
Our Lady of Mercy College, Heidelberg
Sacred Heart College, Geelong
Sacred Heart College, Kyneton
St Aloysius College, North Melbourne
St Joseph's College, Mildura

Western Australia

Mercedes College, Perth
Santa Maria College, Attadale
St Brigid's College, Lesmurdie

South Australia

St Aloysius College, Adelaide

Our Vision

To enrich a dynamic community of Catholic schools committed to the spirit of Mercy.

Our Values

Compassion, Justice, Hospitality, Service, Respect and Courage.

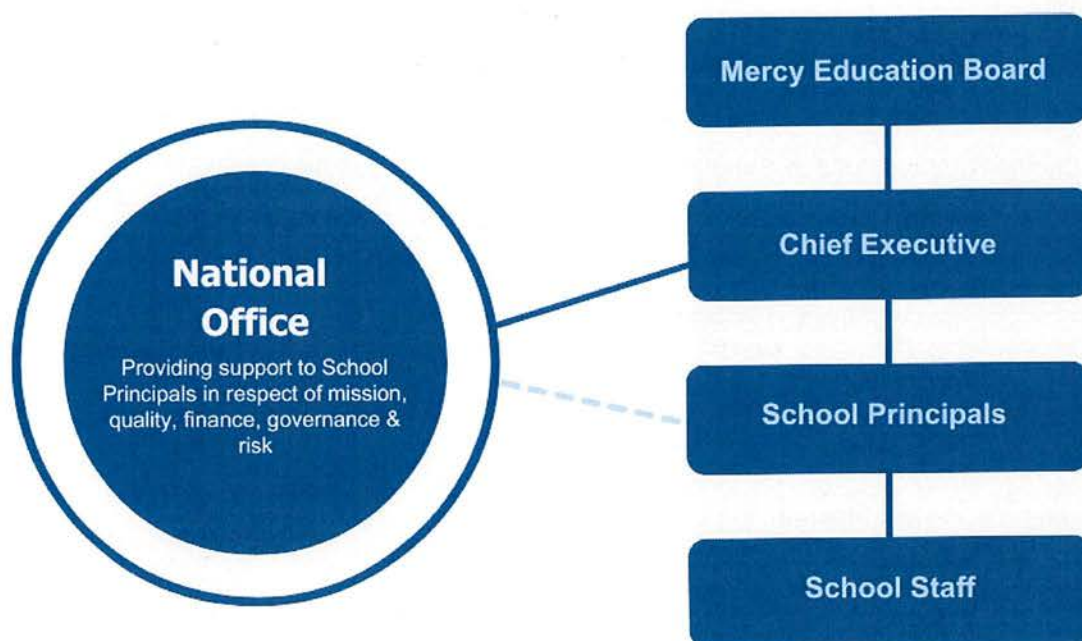
Criteria 2

Operations and Supply Chain

The Mercy Education National Office is based in East Melbourne, Victoria. The National Office provides executive level support to both the Board and 13 Catholic Colleges. This support is focused on strategic and structural matters relating to mission, finance, governance and operations, human resources, child safeguarding, compliance, and risk.

Our Board Directors have full responsibility for all civil governance matters. To assist with this oversight, the Board maintains standing committees in respect of Governance, Finance and Audit, Risk and Compliance, Mission and Educational Performance

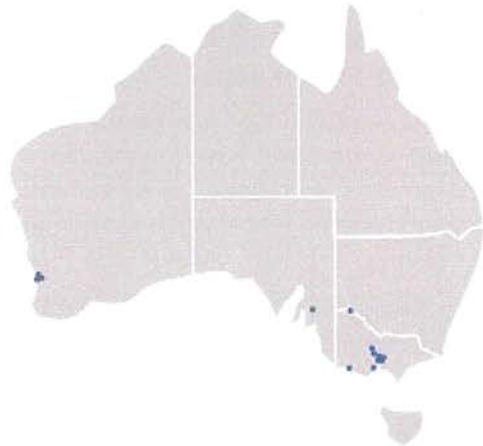
Operational decision-making at each of the 13 Colleges is the responsibility of the College Principal, who reports directly to the Chief Executive Officer of Mercy Education Ltd.



Our Operations

A snapshot of Mercy Education operations in 2025:

- Mercy Education operated Catholic Colleges in South Australia (1), Victoria (9) and Western Australia (3)
- Seven of these Colleges provide a single gender education for girls and the remaining six operate on a co-educational basis. All Colleges offer a full secondary curriculum, with three of our Colleges incorporating primary year levels into their operations. One College operates an Early Learning Centre.
- Eight of our Colleges are based in capital cities and five in major regional centres
- Three of our regional Colleges are multi-campus schools with the rest operating on a single campus
- Two of our Colleges in Western Australia offer boarding facilities
- At 2025's census, 14,445 students were educated in Mercy Education Colleges
- In 2025, our youngest College was 88 years old, and our oldest College was 179 years old – the average age of our Colleges since establishment is over 130 years



Our Workforce Profile

The following staffing guide relates to Mercy Education's 2025 operations:

- Approximately 2,199 staff worked in full-time or part-time employment across Mercy Education Colleges
- A further 48 staff were employed on a casual basis as emergency teachers, sporting coaches, music tutors and other roles
- In many of the Colleges, maintenance, groundskeeping, catering, IT (Information Technology) and cleaning are outsourced to contractor services whose employees are not directly employed by Mercy Education.

Our Supply Chain, Goods and Services

In 2025, Mercy Education had a total operational turnover of \$375m. As an educational institution, the major element of our expenditure is teaching and support staff whose salaries and employment-related cost represented 65% of our turnover.

In terms of non-staffing expenditure, in 2025, Mercy Education spent \$107m on recurrent expenditure and an additional \$130m on capital expenditure.

In 2025, a supplier analysis was undertaken identifying that Mercy Education works with 8,588 individual suppliers annually. A breakdown of total expenditure by our Colleges in each supplier category is included below (see Criteria 3).

Governance & Risk Framework

Governance & Risk Framework The supervision of Mercy Education's responsibilities under the Modern Slavery Act 2018 (Cth) has been allocated to the Risk and Compliance Committee (**RISKCOM**) of the Mercy Education Board. This is consistent with other compliance requirements obligated by legislation.

Whilst the RISKCOM has primary carriage of this responsibility, it is acknowledged that other Board Committees have a significant interest in the topic including the Board's Finance and Audit Committee (in respect of procurement) and the topics are of particular significance to the Mission and Educational Performance Committee (in respect of our ethical obligations as people of Mercy).

For these reasons, the Mercy Education Board will always maintain an active role in the supervision of our progress in respect to anti-modern slavery.

Mercy Education established the Modern Slavery Working Party: a representative committee that includes one representative from each College. The purpose of this platform is to foster discussions on educational opportunities, resources, and curriculum initiatives while reinforcing accountability across supply chains. In 2024, a role description was drafted for Modern Slavery representatives, and this was formalised in 2025.

Mercy Education has formally acknowledged the risks of modern slavery within its corporate risk assessment and continues to improve its understanding of potential vulnerabilities within supply chains. Our commitment remains steadfast in actively managing these identified risks, enhancing procurement protocols, and establishing robust reporting mechanisms moving forward.

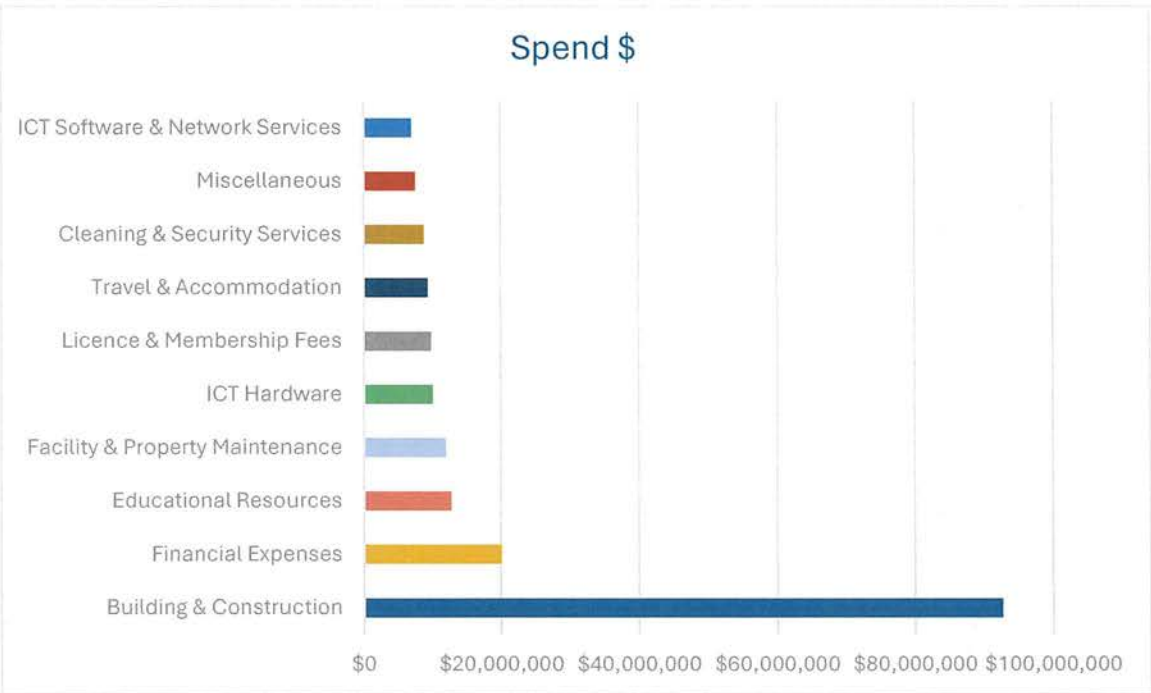
Mercy Education's Risk Appetite Statement and Risk Register as approved by the Mercy Education Board states the following: "Mercy Education opposes all forms of modern slavery and has a commitment to ensure that modern slavery does not flourish within its operations, business relationships and extended supply chains".

Criteria 3

Modern Slavery Risks

Mercy Education engages with a total of 8,588 suppliers across various sectors. In 2025, Mercy Education procured \$216 million in goods and services across 23 supplier categories. Of this, 68% (\$148 million) was spent in 11 potentially high-risk procurement categories of suppliers. Our major spend categories are detailed below, along with a breakdown of supplier spend per category. Additionally, Mercy Education has drawn on the Australian Catholic Anti-Slavery Network (**ACAN**)’s risk taxonomy to categorise the modern slavery risks associated with each procurement category.

Top 10 Spend Supplier Categories



Supplier Spend Breakdown by Risk Category

The table below summarises our procurement activities, categorising supplier spend based on modern slavery risk:

Risk	Category	No of Suppliers	% of Suppliers	Total Spend	% of Total Spend
High	Building & Construction	204	2%	\$92,758,003	43%
High	Cleaning & Security Services	95	1%	\$8,743,960	4%
High	Educational Resources	2,234	26%	\$12,674,707	6%
High	Facility & Property Maintenance	670	8%	\$11,923,831	5%
High	Finance & Investment	1	0%	\$14,717	0%
High	Food & Catering Services	236	3%	\$3,926,797	2%
High	Furniture & Office Supplies	186	2%	\$2,720,817	1%
High	ICT Hardware	139	2%	\$10,032,954	5%
High	Labour Hire	123	1%	\$3,538,472	2%
High	Uniforms & PPE	52	1%	\$1,725,501	1%
High	Waste Management	21	0%	\$453,926	0%
Medium	Advertising & Marketing	161	2%	\$1,799,636	1%
Medium	Fleet Vehicles Management	83	1%	\$851,293	0%
Medium	ICT Software & Network Services	274	3%	\$6,964,256	3%
Medium	Plant & Machinery	34	0%	\$555,804	0%
Medium	Print / Mail Provider	49	1%	\$919,421	0%
Medium	Travel & Accommodation	198	2%	\$9,310,971	4%
Medium	Miscellaneous	3,011	35%	\$7,494,623	3%
Medium	Utilities	80	1%	\$4,456,103	2%
Low	Financial Expenses	70	1%	\$20,047,250	9%
Low	Government & Agency Fees	27	0%	\$4,118,274	2%
Low	Licence & Membership Fees	421	5%	\$9,840,319	5%
Low	Professional Services	219	3%	\$1,939,395	1%
Total		8,588		\$216,811,029	

Supply Chain Risk Assessment

Mercy Education assesses supply chain risks using the ACAN procurement category risk taxonomy, which helps identify high-risk industry sectors. Modern slavery risks are defined by the ACAN Category Risk Taxonomy, a classification standard that identifies severity of actual or potential harm to people (saliency) in spend categories.

The ACAN Category Risk Taxonomy is based on sources such as:

- the Global Slavery Index
- the International Labor Organisation (ILO), including definitions of modern slavery
- the Bureau of International Labor Affairs (ILAB), U.S Department of Labor
- the Global Child Forum and UNICEF

Multiple key factors are also used to determine the level of risk:

- **Geography:** the country or location where a product is made or service is delivered
- **Industry:** the sector in which the making of products or delivery of service occurred
- **Commodity:** the raw materials or components that comprise the goods or products
- **Workforce vulnerability:** such as bonded visas, temporary migrants, women or children known to be employed in specific industry sectors
- **Domus 8.7:** trends, cases, and risk intelligence identified through the Domus 8.7 remediation service, including grievances and remediation insights relevant to category and risk to workers.

This analysis also incorporates:

- commodity and product risks identified in internationally recognised reports on forced labour and modern slavery
- insights from the 2023 Global Slavery Index (GSI) and other relevant Australian and global sources.

Key Supply Chain Risks

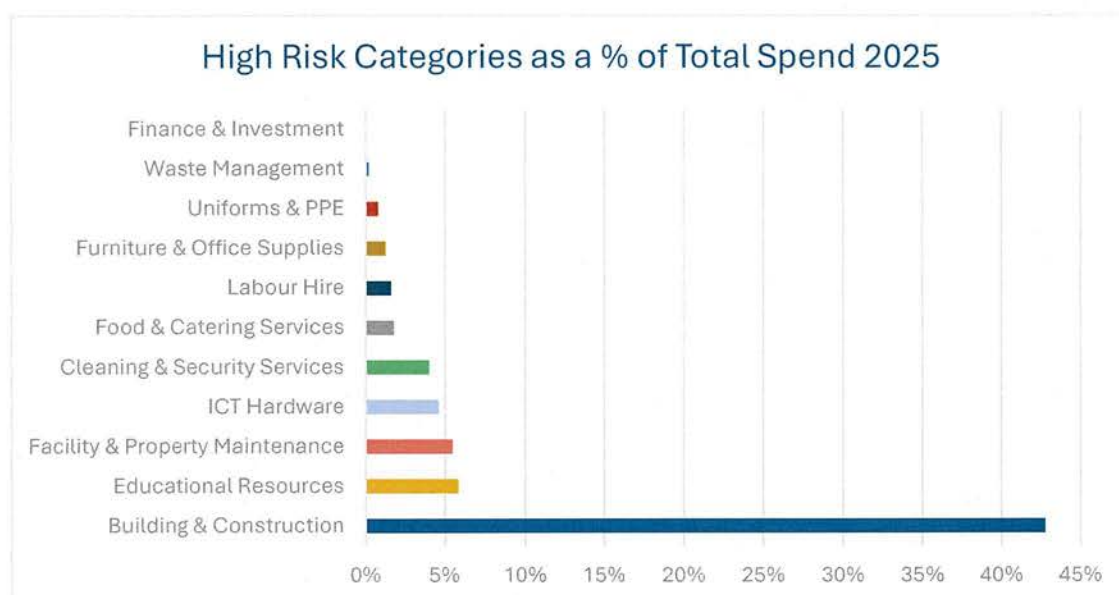
Mercy Education's risk assessment has identified three key procurement areas with an elevated risk of modern slavery:

- Building and construction
- Uniforms and PPE
- Cleaning and security.

These sectors have been flagged due to their high-risk supply chains, which often involve complex international sourcing and exposure to potential exploitation. Notably with regards to Uniforms and PPE, although this is a small direct spend by Mercy Education as a percentage of total spend, this is under-represented because the spend is largely incurred by parents purchasing uniforms from uniform suppliers.

Assessment of High-Risk Procurement

In considering the high-risk categories, Mercy Education has calculated the spend per supplier indicator to assist in prioritising our efforts.

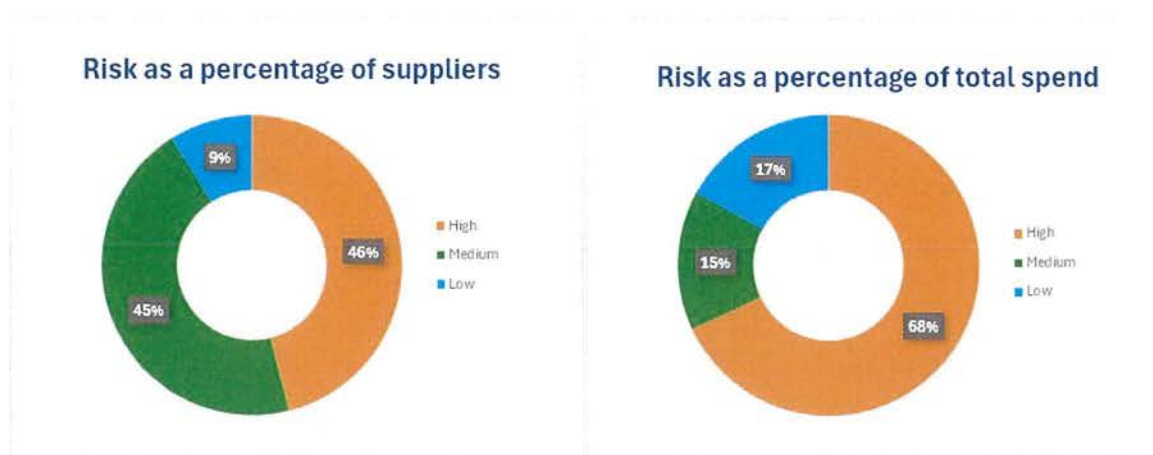


Modern Slavery Risk Metrics

To quantify and prioritise our risk management efforts, Mercy Education has assessed supplier spend using risk indicators. The following metrics provide insight into our high-risk exposure:

- 46% of total suppliers operate in high-risk categories
- 68% of total procurement spend is attributed to high-risk categories
- high-risk category spend totals \$148 million.

Supplier and Spend Percentage Breakdown



Criteria 4

Actions Taken to Address Modern Slavery Risks

Implementation of ROTA

The ACAN modern slavery risk management program provides supplier engagement support and data, enabling a systematic and comprehensive supply chain risk assessment. In 2025 the ACAN Modern Slavery Risk Management Program launched a new purpose-built data management platform - ROTA. ROTA centralises the ACAN Risk Management Program framework and facilitates supplier performance evaluation and engagement through:

1. Evaluation of the modern slavery risk within operations and supply chains, using the ACAN Risk Taxonomy.
2. ACAN Supplier Survey to identify supplier revenue, number of employees, countries of origin for goods sourced overseas, workforce contractual arrangements and Sedex membership status.
3. Supplier education on modern slavery and risk management in key areas: cleaning, building and construction, procurement of labour, labour hire and services, sourcing goods from overseas, grievance mechanisms and remediation.
4. Onboarding suppliers to Sedex requires a business address, contact details and goods or services provided.
5. Sedex Self-Assessment Questionnaire (SAQ) helps suppliers to evaluate their practices against established standards and identify areas for improvement.
6. Desktop review to identify key actions required from suppliers.
7. Enhanced supplier screening using Know Your Client (KYC) intelligence software.
8. Corporate Social Compliance Audits provide a point in time, objective and independent verification process of supplier alignment with local laws and worker wellbeing standards.
9. Domus 8.7 Index modern slavery statement assessment on selected suppliers in high-risk categories.

Governance and Policy Framework

Mercy Education integrates modern slavery risk controls into its governance framework by:

- embedding anti-modern slavery commitments in policies and procedures
- applying a supplier code of conduct
- requiring modern slavery clauses in all new contracts and contract renewals
- reviewing and updating policies annually to strengthen our response

Embedding Modern Slavery Controls in Procurement

Mercy Education integrates modern slavery considerations into procurement through:

- Establishing and maintaining supplier contracts that include modern slavery clauses
- Selecting supply partners that comply with modern slavery standards
- Implementing due diligence processes to assess appropriateness of market participants on Mercy Education tenders.
- Promoting modern slavery awareness through internal policies, staff training and participation in ACAN working groups and initiatives.

Staff Training and Capacity Building

- Members of the Mercy Education Board, National Office and Modern Slavery Working Party were required to complete a suite of 5 ACAN modern slavery e-learning modules suite over a 2-year cycle commencing in 2024. A total of eighteen people have completed all five modules and a further five people have completed at least one module.
- A Working Group meeting was conducted on modern slavery, with 12 staff participating.

Risk Monitoring and Reporting

- Ongoing risk assessments in high-risk procurement categories such as cleaning, construction, ICT, and uniforms
- Development of a risk control monitoring process to track implementation across all Colleges
- Annual Board reporting on modern slavery compliance and mitigation efforts.

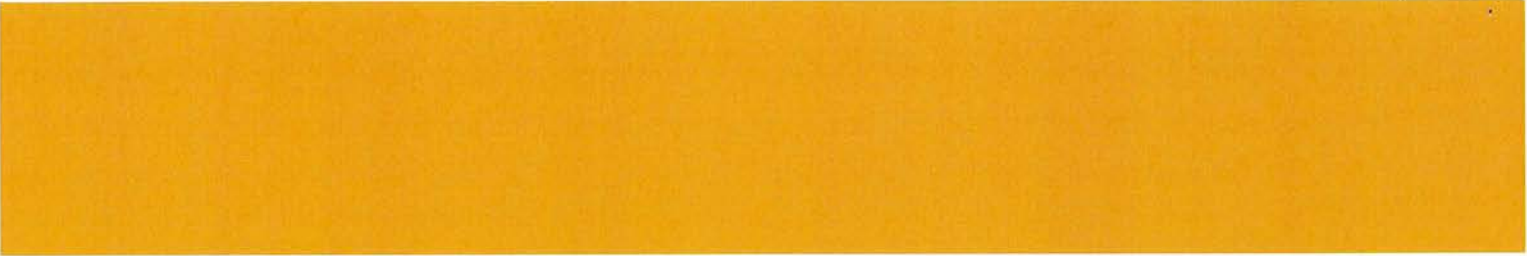
Grievance Mechanism and Remediation

- Staff and suppliers can currently report concerns via Mercy Education's Whistleblower Policy and Complaints Management Policy.

Mercy Education is a founding member of Domus 8.7. Domus 8.7 was established as an agency of the Catholic Archdiocese of Sydney in 2020 as a key element of the ACAN Modern Slavery Risk Management Program. This collaborative approach to remediation is aligned with the Modern Slavery Act and Catholic Social Teaching which are centred on the needs, wellbeing and empowerment of people impacted.

Due to Mercy Education's membership of ACAN, the Domus 8.7 services that are available to Mercy Education if required include:

- resources that enable us to listen to workers (grievance channel)
- a 24/7 careline for workers on our sites, staffed by professional counsellors
- direct support to people impacted by modern slavery
- guidance and technical assistance to prevent, identify and remediate modern slavery
- a documented process to assess if an organisation has caused, contributed or is directly linked to modern slavery and modern slavery indicators



Domus 8.7 empowers people impacted by modern slavery to have choice and control over what forms of remediation are meaningful to them and to engage safely with business/supply chain actors. Supports may include:

- modern slavery indicator assessment
- needs assessment, case coordination, response and remediation planning
- referrals to community, social services, unions
- transport, accommodation, financial and food support
- legal support, referrals, accompaniment and advocacy
- job training, retraining and redeployment
- accompaniment and advocacy to engage with government and law enforcement agencies
- opportunities to contribute lived expertise to improve modern slavery responses

The Domus 8.7 Advisory Committee Members also include a person with lived expertise, Mr Moe Turaga. Domus 8.7 is a registered charity with the Australian Charities and Not-for profits Commission (ACNC) and is an endorsed Public Benevolent Institution with Deductible Gift Recipient (DGR) status. ABN 244 72497189

Criteria 5

Assessing Effectiveness

Mercy Education uses ACAN Baseline Data metrics that capture the outcomes of some of our actions. The data demonstrates continuous improvement when compared with data year on year and assists in planning future actions.

2025	Activity	2025	2024
Internal / Staff	Hours spent on modern slavery activities	80	77
	Individual staff completed e-learning	11	15
	E-learning modules completed	31	70
External / Supplier Engagement	Total number of suppliers	8,588	7,865
	Number of suppliers across high-risk categories	3961	176
	Number of ACAN Supplier Surveys completed	935	79
	Supplier staff attending capacity building webinars	19	0
	Invited to join Sedex	106	29
	Joined Sedex	58	23
	Sedex SAQ completed	37	11
	Social audits	1	0
	Corrective actions	6	0
	Contacts made via worker voice / grievance mechanism	0	0
	Referrals for advice assistance	0	0
Domus 8.7 External Referrals	Individuals identified or referred to modern slavery assessment	0	0
	Individuals with modern slavery cases remediated	0	0

Continuous improvement

Collaboration is at the heart of accelerating progress. This also includes opportunities to comparatively measure social, environmental and governance (business ethics) risks and actions with peers in our network. In its foundational stages, Mercy Education used an internally devised ACAN framework to measure progress. This bespoke approach reflected the unique priorities, constraints, and practices across Catholic organisations.

In 2025, the ACAN Program adopted a globally recognised risk measurement system through SEDEX. This aligns reporting entities with a methodology that combines global data about risks in different countries and industries with site-specific information from the SEDEX platform. SEDEX regularly updates the methodology to ensure it is aligned with new and emerging risks. Therefore, completion of the SEDEX Self-assessment Questionnaire (SAQ) completed by Mercy Education is a substantial measure of continuous improvement year on year. Below is an explanation of how scoring is calculated using the SEDEX SAQ Mercy Education's 2025 risk scores and management controls that will serve as our benchmark for continuous improvement.

Explanation of Scoring

Combined Risk Score: calculated from inherent risk and site characteristics, adjusted for management controls and audit results. The score is broken down by pillar and highlights strengths and opportunities to focus our efforts on key areas that drive ethical and sustainable practices.

Combined Risk Score
3.5/10
● Low risk

Inherent Risk Score: predicts potential risks based on a country/region, and sector. Spanning all four pillars, this score is broken down by topics. It can be used as a baseline to identify and prioritise areas for improvement in operations. This score shows the natural risks of doing business in a specific country or sector. It does not include any details about individual sites.

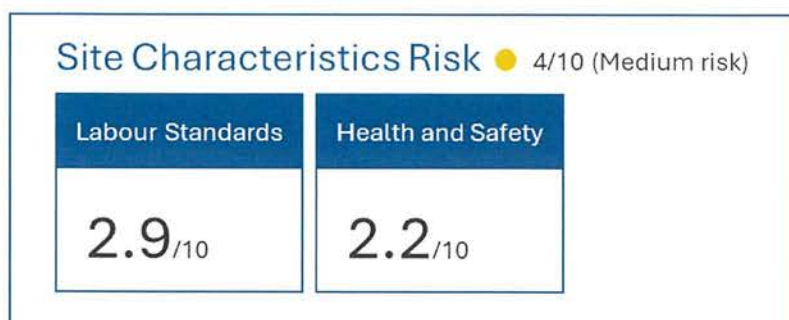
- **Labour Standards Pillar** - assesses location and industry factors that could increase labour risks, such as vulnerable worker populations or high rates of workplace violations.
- **Health and Safety Pillar** - considers regional and industry-specific health and safety risks, including local regulations and industry accident rates.
- **Business Ethics Pillar** - assesses industry and location risks related to unethical practices, such as high corruption levels or weak regulatory oversight.
- **Environment Pillar** - examines the environmental impact of the site's industry and location, such as pollution levels or resource use that may create regulatory or compliance risks.

Inherent Risk ● 2.9/10 (Low risk)			
Labour Standards	Health and Safety	Business Ethics	Environment
2.9/10	2.2/10	1.8/10	3.3/10

Site Characteristics Risk Score: highlights potential risks based on our suppliers' SAQ responses in the Labour Standards and Health and Safety pillars. This score can be used to assess and support the implementation of policies and processes that mitigate workplace risks within our supply chain. For the Environment SAQ, site characteristics consider the type of work, business and location (e.g. proximity to sensitive areas). For the Core SAQs, risks are assessed based on the nature of the work, such as exposure to heavy machinery or hazardous materials.

Labour standards - reflects labour-related risks like employment practices, workers rights and wages based on SAQ responses. High-risk activities in this area can raise the score.

Health and Safety - based on SAQ responses to questions about site-specific health and safety factors, such as equipment usage, handling of chemicals or accident risks.



Management Controls Score: measures how well policies or processes are in place to reduce the risks from the site characteristics. It is also based on answers in the SAQ. A Poor score of 0-0.9 indicates that there are few or no controls in place. An Advanced score of 4-5 indicates that there are exemplary controls that exceed compliance and drive innovation.

Labour standards - evaluates policies and processes to ensure fair labour standards and worker protections are effectively managed.

Health and Safety - reviews the adequacy of safety protocols, emergency preparedness and training efforts to manage health and safety risks on site.

Business Ethics - evaluates controls against unethical practices such as anti-bribery policies, compliance with legal standards and transparent operations.

Environment - looks at policies managing environmental impact, resource efficiency and waste reduction practices to align with sustainability standards.



Note: Environment does not have a score as risk questions are not triggered because Mercy Education has not identified potential for significant impacts on the environment, and no additional requirements are in place for clients and service provided not involving high-emission activities.

Criteria 6

Internal Consultation

The Anti-Modern Slavery Working Party was established to serve as a consultative forum with Anti-Modern Slavery Liaison Officers appointed in each College. Further internal consultation is currently managed by the appointed Modern Slavery Representatives in each College.

Modern slavery remains a standing item on RISKCOM's annual workplan. This ensures regular oversight of Mercy Education's risk exposure, mitigation measures and progress against its modern slavery commitments, pursuant to Mercy Education's Risk Management Framework.

Criteria 7

Other Information

No other relevant information



Mercy
Education

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ABN 69 154 531 870



Mercy Health

Care first

Mercy Health:

Modern Slavery
Statement 2025



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About Mercy Health

Mercy Health is a Catholic not-for-profit organisation that provides a range of health, aged and community care services to communities in Victoria, the Australian Capital Territory, New South Wales, Western Australia and Queensland. We care for people throughout life from conception to death. We are focused on the whole person: their health, their wellbeing and their capacity and freedom to thrive.

Mercy Health operates at all times as part of the mission of the Catholic Church and is stewarded as a ministry of Mercy Ministry Companions.

In the tradition of the first Sisters of Mercy and based on the vision of their founder, Catherine McAuley, we are an organisation dedicated to action. We are impelled by the principles of equity and social justice that were evident in that founding vision.

Central to our mission is providing care for those in need, irrespective of religion, faith, beliefs or background.

Welcome from the Mercy Health Chair



Virginia Bourke
Chair, Mercy Health

This is the sixth modern slavery statement provided by Mercy Health under the Modern Slavery Act 2018 (Cth).

For a Catholic organisation like Mercy Health, the provision of health care reflects the belief that all persons are made in the image of God. In particular, the Catholic Church has been inspired to care for the sick as one of the corporal works of mercy.

However, caring for the sick in the modern world typically requires the use of goods and services that have been produced with materials sourced from, and manufactured in, all parts of the world.

The central insight of the modern anti-slavery movement is that exploitation of the poor and vulnerable is embedded in the global supply chain. Inevitably, those who seek to do good by caring for others also risk entrenching the suffering of others through the global supply chain.

It is in that context that the anti-modern slavery movement seeks to trace the origins of goods and services through the supply chain in order to address slavery and slavery-like practices. That the task remains undone in many respects is a call to re-commit ourselves to its achievement.

This statement is made together with a range of Australian Catholic organisations in the Australian Catholic Anti-Slavery Network as part of its compendium of modern slavery statements.

As Chair of Mercy Health, I would like to thank everyone who has worked to eliminate modern slavery from the supply chains of Mercy Health.

This modern slavery statement

This modern slavery statement is a joint statement made on behalf of the three reporting entities within Mercy Health:

- Mercy Hospitals Victoria Ltd (revenue \$646,664,711 in 2025)
- Mercy Aged and Community Care Ltd (revenue \$499,217,073 in 2025)
- Mercy Health Australia Ltd (does not produce consolidated accounts, but is the sole member of all the entities in the group and had a consolidated revenue in excess of \$1.198 billion in 2025).

The statement covers all entities owned or controlled by Mercy Health Australia Ltd, known together as 'Mercy Health'.

All of the entities within Mercy Health are registered as charities with the Australian Charities and Not-for-profits Commission. Annual information statements, financial reports and other information for those entities can be found at www.acnc.gov.au.

Although Mercy Health generally reports on a 1 July to 30 June basis, we have adopted the reporting period of the ACAN's compendium members for the purpose of this statement. Accordingly, this statement is given for the period 1 January to 31 December 2025.

Our organisational structure

Mercy Health

Mercy Health is comprised of Mercy Health Australia Ltd and its subsidiaries. Mercy Health Australia Ltd is governed by Mercy Ministry Companions under canonical and civil law, and Mercy Ministry Companions Ltd is the sole member of Mercy Health Australia Ltd.

Mercy Health Australia Ltd is the sole member of each of the following companies:

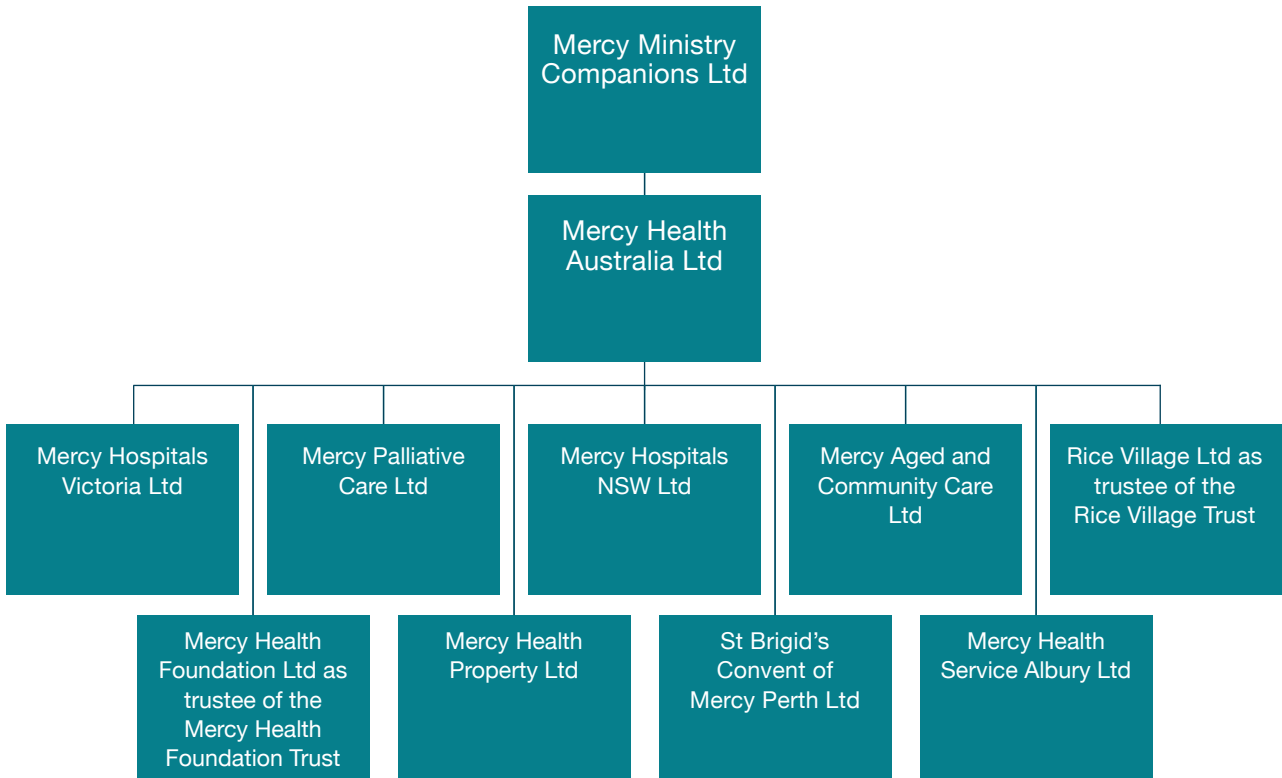
Mercy Hospitals Victoria Ltd	ACN 614 116 013	ABN 74 762 230 429
Mercy Hospitals NSW Ltd	ACN 075 648 350	ABN 53 075 648 350
Mercy Palliative Care Ltd	ACN 614 116 148	ABN 77 896 699 763
Mercy Aged and Community Care Ltd	ACN 088 254 460	ABN 77 191 901 062
Rice Village Ltd as trustee of the Rice Village Trust*	ACN 089 460 935	ABN 13 785 344 170
St Brigid's Convent of Mercy Perth Ltd	ACN 617 402 767	ABN 57 714 505 919
Mercy Health Foundation Ltd as trustee of the Mercy Health Foundation**	ACN 107 275 230	ABN 60 905 269 648
Mercy Health Property Ltd	ACN 082 093 150	ABN 26 412 756 615
Mercy Health Service Albury Ltd	ACN 068 291 234	ABN 82 068 291 234

* A trust established in accordance with the wills of Hannah Kathleen Moylan and Margaret May Rice administered cy-pres in accordance with Orders made by the Supreme Court of Victoria on 19 November 1993 and leave pursuant to section 63 of the *Religious Successory and Charitable Trusts Act 1958* (Vic) given in Orders made by the Supreme Court of Victoria on 30 November 1994.

** A trust established by deed made 30 March 2005 and as amended.

Corporate Structure

Mercy Health’s corporate structure is illustrated in the following chart:



Our governance framework

Mercy Health Australia Ltd and its subsidiaries, along with Rice Village Trust and Mercy Health Foundation Trust, constitute Mercy Health.

The membership of the boards of the companies that make up Mercy Health, other than Mercy Health Foundation Ltd, is concurrent. The concurrent boards are known as ‘the Mercy Health Board’.

Mercy Health Foundation — which seeks philanthropic support for the work of Mercy Health — has a separate Board of Directors, referred to here as the ‘Foundation Board’.

All of the entities that make up Mercy Health are supported by our Group Chief Executive Officer and Executive management team based in Melbourne. Support services functions are also shared across the organisation. For example, human resources and procurement teams support the organisation as a whole.

Our operations and supply chain

Operations

Mercy Health provides a range of health, aged and community care services in Australia.

Mercy Health provides public hospital services in Victoria and New South Wales. We cared for approximately 119,000 people in our Victorian hospitals in 2025. In that year, just over 8,770 babies were born in those Victorian hospitals, 2,648 families were supported by our early parenting centres and more than 3,100 people received mental health services.

At the end of 2025, Mercy Health was operating 30 residential aged care homes across four states, providing care to about 2,500 people.

Mercy Health also supports people to live independently at home. In 2025, we provided care for more than 5,800 people in their own homes.

Supply chain

Mercy Health purchases a wide range of goods and services, including:

- medical and related services, such as allied health services, medical imaging services, pathology services and agency staff
- building, construction and infrastructure services, including waste management and medical gas supply
- ancillary services such as food, cleaning, linen and laundry and security
- communications, information technology hardware and support, and software solutions and support.

We deal mainly with suppliers that have an Australian presence. However, our suppliers' head offices are based all around the world, with key countries including Australia, New Zealand, China, the United Kingdom, Italy, the United States of America and Germany.

Mercy Health's suppliers manufacture or source from manufacturers all over the world. Manufacturing occurs in a number of countries including Australia, the United States of America, Germany, Turkey, Japan, China, Malaysia, Mexico, Columbia and Sri Lanka.

Modern slavery risks in our operations and supply chain

Operational risk

About 11,553 people — 74 per cent of whom are women — worked for Mercy Health in 2025. Of the total number of staff, 5,658 worked in health services, 4,626 worked in residential aged care, 773 worked in home care and 493 worked in support services.

While Mercy Health employs people from approximately 75 countries, including India, the Philippines, Nepal and the United Kingdom, our employees are engaged in Australia.

Just over 615 staff from 41 countries hold temporary visas. Visa applications related to those positions are managed by an in-house team in accordance with our Visa Policy and Procedure, and in compliance with immigration requirements under Australian law.

Mercy Health engages our employees under a wide range of enterprise agreements and modern awards, as well as under common law, and frequently engages with trade unions acting on our employees' behalf.

Some staff are engaged through agency and other labour hire arrangements. Where state laws require it, we engage such staff only from registered labour-hire providers.

Mercy Health has a range of systems in place to identify and action changes to employment entitlements, immigration requirements, equal opportunity requirements and health and safety legislation. Mercy Health has a rolling internal audit plan that includes review of employee related entitlements.

Mercy Health has a Code of Conduct that governs how our employees conduct themselves in our operations. The Code of Conduct is based on our organisational values: compassion, hospitality, respect, innovation, stewardship and teamwork.

Mercy Health does not tolerate improper conduct by our employees, officers or volunteers, and we are committed to protecting and supporting whistleblowers who disclose improper conduct. This is explained in greater detail in our Whistleblowers Policy and Procedure and on our website.

The policies and procedures that govern how we relate to our people are available throughout the organisation and are reviewed and updated on a regular basis.

Supply chain risks

Turning to Mercy Health's supply chain, in 2025, Mercy Health purchased goods and services to the value of more than \$360 million from approximately 3,950 suppliers for the purpose of carrying out its activities.

The goods and services purchased by Mercy Health to support its operations are outlined above. Those goods and services include a number of categories identified as high risk in the ACAN Category Risk Taxonomy:

High Risk Categories	
Building and construction	Furniture and office supplies
Cleaning and security	ICT Hardware
Events and event management	Labour Hire
Facility management and property maintenance	Linen, laundry and textile products
Finance and investment	Medical devices and supplies, uniforms and personal protective equipment
Food and catering services	Waste management services

In an analysis of the largest suppliers to Mercy Health in 2025, 74.6% were in high risk categories.

The actions taken to address those supply chain risks within Mercy Health are identified below.

Actions taken to assess and address the risks

Modern Slavery and Ethical Purchasing Working Group

Mercy Health established a Modern Slavery and Ethical Purchasing Working Group in February 2020, chaired by General Counsel. The Working Group includes Executive representation from the Chief Financial Officer; Chief People Officer; and the Chief Information Officer. The Group also includes representatives from procurement, health services, aged care and risk teams.

Supplier Engagement

Mercy Health has engaged with significant suppliers to understand and influence their systems for assessing and addressing the risk of modern slavery in their operations and supply chains.

Our supplier engagement has included:

- Implementing a detailed modern slavery questionnaire, designed to identify direct supplier risk as well as risk in at least second-tier supply chains;
- Developing standard letters to suppliers providing the Mercy Health Supplier Code of Conduct and Modern Slavery Policies and requesting a commitment to the Code and Policies;
- Including the Code and Policies in tender documentation and the requirement for tenderer acknowledgement; and
- Inclusion of modern slavery clauses in significant Mercy Health supply contracts and tender documentation.

Partnerships

Mercy Health operates in partnership to address risks of modern slavery.

Australian Catholic Anti-Slavery Network (ACAN)

Since 2019, Mercy Health has been a member of the Australian Catholic Anti-Slavery Network (ACAN), made up of more than 40 Catholic organisations around Australia including large Catholic health and aged care providers.

Mercy Health modern slavery liaison officers attended monthly ACAN meetings with the aim of understanding and responding to the potential risks of modern slavery in our organisation and supply chain.

Mercy Health has worked with ACAN to develop our organisational commitment, internal education and training, procedural tools and resources and business systems.

Health Share Victoria

Mercy Health procures certain goods and services for its Victorian hospitals and community palliative care service through Health Share Victoria. Health Share Victoria procures goods and services for public sector health services in Victoria. Health Share Victoria repudiates modern slavery and has adopted a risk-based approach to combating modern slavery in health service supply chains.

Stopline

Mercy Health engaged Stopline to provide a third-party whistleblower service receiving disclosures of serious misconduct at Mercy Health, including concerning modern slavery practices in our operations and supply chain. Whistleblowers inside and outside of Mercy Health can use a range of technologies – including a website – to make disclosures. Disclosures may be made anonymously or confidentially, allowing whistleblowers to make them without fear of retribution. The service became operational early in 2023. To date, there have been no reports of modern slavery practices at Mercy Health through Stopline.

Enterprise risk management

The Mercy Health Board reviews and approves an Enterprise Risk Management Framework annually. This framework ensures a consistent approach to identifying, evaluating and managing all significant risks across the enterprise.

In 2019, we developed a Modern Slavery Risk Management Approach Procedure, which aligns to the overall framework.

Process	1. Risk Stratify Inventory	2. Risk Based Engagement	3. Appropriate Remediation
Risk Management Activities	Maintain inventory of suppliers with information regarding their potential Modern Slavery Risk (High, Medium or Low) (ACAN Risk Taxonomy)	Assess the level of Strategic and Value Impact of the high risk supplier. (ACAN Supplier Engagement Strategy) Develop Engagement Strategy based on the Strategic / Value impact of the high-risk supplier. (ACAN Supplier Engagement Strategy)	Where instances of modern slavery are identified a prioritised risk management approach is taken: i. Modern slavery risk caused by our Entity ii. Contributed to by our Entity iii. Directly linked to our Entity
Scope	Mercy Operations; Suppliers / Vendors and their Suppliers; Emerging Suppliers		
Foundation	Core Internal Controls; ACAN Supplier Engagement Strategy; ACAN Risk Taxonomy; Modern Slavery Act 2018		
Objective	Care First: We will care for, and about, marginalised and disadvantaged groups.		

The risk of Modern Slavery was explicitly embedded in the framework in 2022, as part of the Environmental, Social and Governance risk category, and it remains in place as of 2025.

Investment

Mercy Health — including the Foundation — invests in accordance with Mercy Health's Investment Management Policy, which has included ethical investment guidelines since at least 2019.

Mercy Health's Investment Management Policy and its ethical guidelines frame our approach to ethical considerations in investing. We seek to invest in companies that promote human welfare, dignity and respect, and the general good.

We avoid, limit or minimise investments in companies whose products, services or practices are contrary to Mercy Health values or teachings of the Catholic Church, cause or perpetuate injustice and suffering, or infringe human rights. We also exclude investments in companies where their practices are unacceptable from a human rights or modern slavery perspective.

External investment advisors engaged by Mercy Health are required to comply with our policy, including ethical guidelines relating to modern slavery, when providing us with advice or investing on our behalf.

Internal education and awareness

Mercy Health has continued to promote internal education and awareness of modern slavery.

We are continuing to deliver online training using ACAN modules for the Working Group and relevant business units (procurement, information technology, finance and property). The online training modules have comprised Modern Slavery 101, Implementing a Modern Slavery Risk Management Program, Business Relevance, and Grievance Mechanisms and Remedy.

While we have focussed on educating and training the most relevant staff within Mercy Health, the online training module 'Modern Slavery 101' was made available to all Mercy Health staff via our online education platform toward the end of 2021.

Mercy Health marked the International Day for the Abolition of Slavery by circulating internal communications.

Mercy Health's intranet includes information about Modern Slavery, which was updated in 2025.

Supplier education and awareness

We also encouraged our suppliers to educate themselves about modern slavery.

Mercy Health has invited suppliers to attend webinars for suppliers to Catholic entities presented by ACAN which cover modern slavery risks, expectations of suppliers to cooperate in modern slavery risk management and ways for suppliers to build internal capacity.

Community awareness

To promote awareness of modern slavery and Mercy Health's efforts to overcome it, we placed the Mercy Health Modern Slavery Statements for 2020 to 2024 on the Mercy Health website along with a summary.

Remediation

Mercy Health is committed to ensuring we provide appropriate and timely remedies to people affected by modern slavery.

Mercy Health is a founding partner of Domus 8.7, an independent program providing remedy to people affected by modern slavery. By partnering with Domus 8.7, Mercy Health can help people affected by modern slavery achieve meaningful outcomes.

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Assessment of our effectiveness

The Modern Slavery and Ethical Purchasing Working Group review the effectiveness of the actions Mercy Health is taking in addressing the risk of modern slavery in our operations and supply chain.

Consultation within Mercy Health

The entities owned or controlled by Mercy Health Australia Ltd were consulted in the preparation of this statement as follows:

- The Mercy Health Board and the Mercy Health Foundation Board approved the giving of this statement.
- Members of the management team involved in the Working Group work across all entities that constitute Mercy Health.

Neither Mercy Hospitals Victoria Ltd nor Mercy Aged and Community Care Ltd own or control any other entities.

Approval

This statement was approved by the Board of Mercy Health Australia Ltd in its own right and as the parent entity of Mercy Hospitals Victoria Ltd and Mercy Aged and Community Care Ltd, at its meeting on 9 June 2026.



Virginia Bourke
Chair, Mercy Health Australia Ltd



For more information

General Counsel

Mercy Health Support Services
2/12 Shelley St
Richmond Vic 3121
mercyhealth.com.au

Mercy Health acknowledges Aboriginal and Torres Strait Islander Peoples as the first Australians. We acknowledge the diversity of Indigenous Australia. We respectfully recognise Elders past, present and emerging. This statement was produced on Wurundjeri Country.

Artwork: from wabung-ngetel ('Call of Country') by Gunnai and Yorta Yorta artist Dixon Patten.



Modern Slavery Statement 2025

Reporting period 1 January 2025 - 31 December 2025
Southern Cross Care (NSW & ACT) | ABN: 76 131 082 374



Acknowledgement of Country

Southern Cross Care (NSW & ACT) acknowledges the Traditional Owners of the land and the waters upon which we work and live.

We pay our respects to the Elders past, present and future, for they hold the memories, the traditions, the culture and hopes of Aboriginal and Torres Strait Islander peoples across Australia.

A better understanding and respect for Aboriginal and Torres Strait Islander cultures develops an enriched appreciation of Australia's cultural heritage and can lead to reconciliation. This is essential to the maturity of Australia as a nation and fundamental to the development of an Australian identity.

Artwork: Life on Country by Aunty Kerrie Kenton

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Message from the Chair

For more than five decades, Southern Cross Care (NSW & ACT) has upheld a strong tradition of delivering compassionate, high quality aged care, founded on respect and guided by our belief in the fundamental dignity of older Australians.

Our mission extends beyond addressing physical needs; it embraces the nurturing of emotional, social and spiritual wellbeing throughout our communities.

This belief in the worth and humanity of every person extends to everyone we work with.

It shapes the way we engage with residents, staff, suppliers, and partners, and it inspires our ongoing efforts to eliminate modern slavery and promote ethical and responsible practices across our organisation and supply networks.

Since joining the Australian Catholic Anti-Slavery Network (ACAN) in 2020, and through the leadership of our Modern Slavery Working Group, we have continued to strengthen our frameworks, deepen our understanding of risk, and enhance our organisational response.

Our sixth Statement highlights significant progress made in 2025. We strengthened supplier onboarding and risk management processes, improving visibility and accountability across our supply chain. We also advanced our work with key supply partners to ensure all high-risk products meet certified compliance, reducing exposure to unethical practices. In addition, we broadened grievance and remediation pathways through the introduction of the 24-hour Domus 8.7 hotline and expanded external reporting guidance to support staff, suppliers, and community members in raising concerns safely.

Alongside these measures, 38% of our employees took part in our Modern Slavery learning program, supported by ACAN training for leaders. Their engagement reflects our shared commitment to building a workforce that is informed, vigilant, and confident in recognising and responding to modern slavery risks.

Looking ahead, our top priorities for 2026 focus on people, awareness, and strengthening the systems and tools that support our workflows and data.

As a Board, we remain committed to ensuring these priorities are embedded across the organisation and supported by strong governance.

We will assess opportunities to prioritise domestic manufacturing options to improve supply chain transparency and reduce modern slavery risks. We will continue to educate and train Southern Cross Care (NSW & ACT) staff to recognise the signs of modern slavery. And we will maintain compliance of high risk goods by partnering with approved and reliable suppliers across all tiers of the supply chain.

Modern slavery remains a serious global challenge, with an estimated 41,000 people affected in Australia and 50 million worldwide. Southern Cross Care (NSW & ACT) remains steadfast in our responsibility to address this injustice and uphold strong human rights protections.

We remain committed to working closely with our suppliers, partners, and communities to foster an environment where exploitation is eliminated and every individual is treated with dignity and respect.

Principal Governing Body Approval Date

This Modern Slavery Statement was approved on 01 June 2026 by the principal governing body of Southern Cross Care (NSW & ACT), ABN 76 131082 374, as defined by the Modern Slavery Act 2018 (Cth) ("the Act").

This Modern Slavery Statement is signed by a responsible member of Southern Cross Care (NSW & ACT), as defined by the Act.



Caroline Waldron
Chair



About us

At Southern Cross Care (NSW & ACT), our purpose is to enable older people to live life to the full. Guided by our values of Honesty, Empathy, Acceptance, Respect and Teamwork, we are committed to providing exceptional care that meets the physical, emotional, and spiritual needs of every person we serve.

As an organisation entrusted with the wellbeing of older Australians, we recognise our responsibility to uphold the highest standards of ethical conduct. This includes ensuring that the people, services, and supply chains we rely on reflect our commitment to dignity, fairness and respect for human rights. We believe that every individual whether a resident, client, employee, volunteer, or worker within our broader supply network deserves to be treated with care, safety, and integrity.

We deliver personalised, quality care and support services across our network of Retirement Villages, Support at Home services and Residential Aged Care homes in more than 40 locations, including regional communities. Every day, we support thousands of people to live with purpose and dignity, and this commitment extends to ensuring our operations are free from exploitation and aligned with our values.



2025 Achievements

Southern Cross Care (NSW & ACT) is committed to upholding the dignity of every person by actively identifying, managing, and reducing the risk of modern slavery across our operations and supply chains. Grounded in our Catholic values and guided by our mission to support the most vulnerable, we recognise the vital role we play in promoting ethical sourcing, safeguarding human rights, and influencing meaningful change through our partnerships.

In 2025, we further educated SCC staff and raised awareness, introducing new workflows and systems to better understand supply chain data and enhance our Modern Slavery risk management program.

Key achievements include:

- * Enhanced vendor governance and strengthened supplier risk management protocols during the onboarding of new suppliers. Leveraging data enables SCC to maintain a proactive approach in understanding its entire supply chain and assessing global impacts.
- * Ongoing strategic collaboration with Bunzl to improve visibility into Tier 2 supply chains and reduce the number of high-risk items lacking certified compliance, including the removal or replacement of unaudited high-risk SKUs. All top high-risk products sourced through Bunzl now meet compliance, using Bunzl Certified products.
- * A total of 859 SCC employees completed the SCC Modern Slavery learning program, with the awareness campaign now incorporating additional ACAN modern slavery training and targeted sessions for SCC leaders.
- * Facilitated dedicated breakout sessions at the SCC Leadership Conference focused on modern slavery, emphasising the importance of practical awareness and outlining actionable pathways when signs are identified in day-to-day operations.
- * Mapped the SCC Risk Taxonomy to align with ACAN reporting requirements and introduced MS risk assessments into high risk categories through SCC contractual provisions.
- * Broadened grievance and remediation channels by launching the 24 hour Domus 8.7 hotline and publishing external website guidance with contact details, reporting mechanisms, and victim support resources.

Our focus:

Our actions are informed by the Australian Modern Slavery Act 2018 (Cth) and our participation in the Australian Catholic Anti-Slavery Network (ACAN), which continues to provide important guidance and benchmarking.

We will continue our journey and approach through building stronger data systems, more targeted supplier due diligence, and expand initiatives with industry partners to support greater supply chain transparency. We remain committed to continuous improvement, collaborative action, and the creation of systems that uphold human dignity across every part of our work.

Criterion 1

Our Structure

Southern Cross Care (NSW & ACT) is dedicated to improving the lives of older Australians through a broad range of compassionate services, including Support at Home, Retirement Communities and Residential Aged Care. With a presence across numerous locations in New South Wales and the Australian Capital Territory, SCC is embedded within the communities it serves, responding to local needs and supporting older people to live with dignity and purpose.

Our approach is grounded in our HEART values of honesty, empathy, acceptance, respect and teamwork. These values shape our culture, guide decision-making and inform how we engage with residents, clients, staff, suppliers and the broader community. Ethical integrity is central to our operations, and this Modern Slavery Statement reflects SCC's commitment to transparency, accountability and respect for human rights across all aspects of our business.

Our operations and supply chain



2,230

Dedicated
Staff



4,173

Residents and
Clients supported



40

Towns / Communities
Served



27

Retirement
Communities



27

Residential
Care Homes



350

Support at Home
Suburbs Serviced

Criterion 2

Our operations and supply chain

Organisational Chart



Operations

Southern Cross Care (NSW & ACT) delivers Residential Aged Care, Support at Home and Retirement Living services supported by corporate and operational functions. Our services rely on a broad network of suppliers that enable the safe and effective delivery of care and support to residents and clients.

Our operations are supported by a strong network of 1,651 suppliers, ensuring the smooth delivery and ongoing enhancement of our services. Most of these suppliers are based in Australia and share our values of integrity and accountability, further strengthening our commitment to supporting the local supply chain.

Governance

Governance of modern slavery risk management is overseen by SCC's Modern Slavery Working Group, which is responsible for coordinating supplier due diligence, risk identification and mitigation activities. These activities are connected to executive governance, with regular reporting to the Executive Leadership Team, CEO and Board to ensure modern slavery remains a strategic and organisational priority.

Our Modern Slavery Working Group met quarterly throughout 2025, with representatives from seven departments and an 82% attendance rate, ensuring a coordinated, informed response to modern slavery risks. The team's cross-functional composition including procurement, IT, marketing and communications, people and culture, facilitates the integration of supplier engagement processes and data insights into our operational strategy. These meetings, continuing into 2026, are focused on strengthening our comprehensive approach by expanding the group to include additional stakeholders and experts. This expansion ensures alignment with ACAN's framework for systematic supply chain risk assessment, ongoing supplier education, and transparent reporting.

A dedicated Modern Slavery Liaison Officer (MSLO) holds accountability for delivery and oversight of SCC's modern slavery strategy and initiatives, acting as a conduit and collaboration lead with internal and external stakeholders. Our CEO and Board receive regular updates, ensuring executive oversight of our progress.

The established governance framework also facilitates a swift and structured process for escalation of modern slavery issues to the board.

In July 2025, we distributed our Modern Slavery Statement to suppliers, published it on our website and internal Heart HQ platform, and reinforced our commitment to openness with all stakeholders.

Supply chains

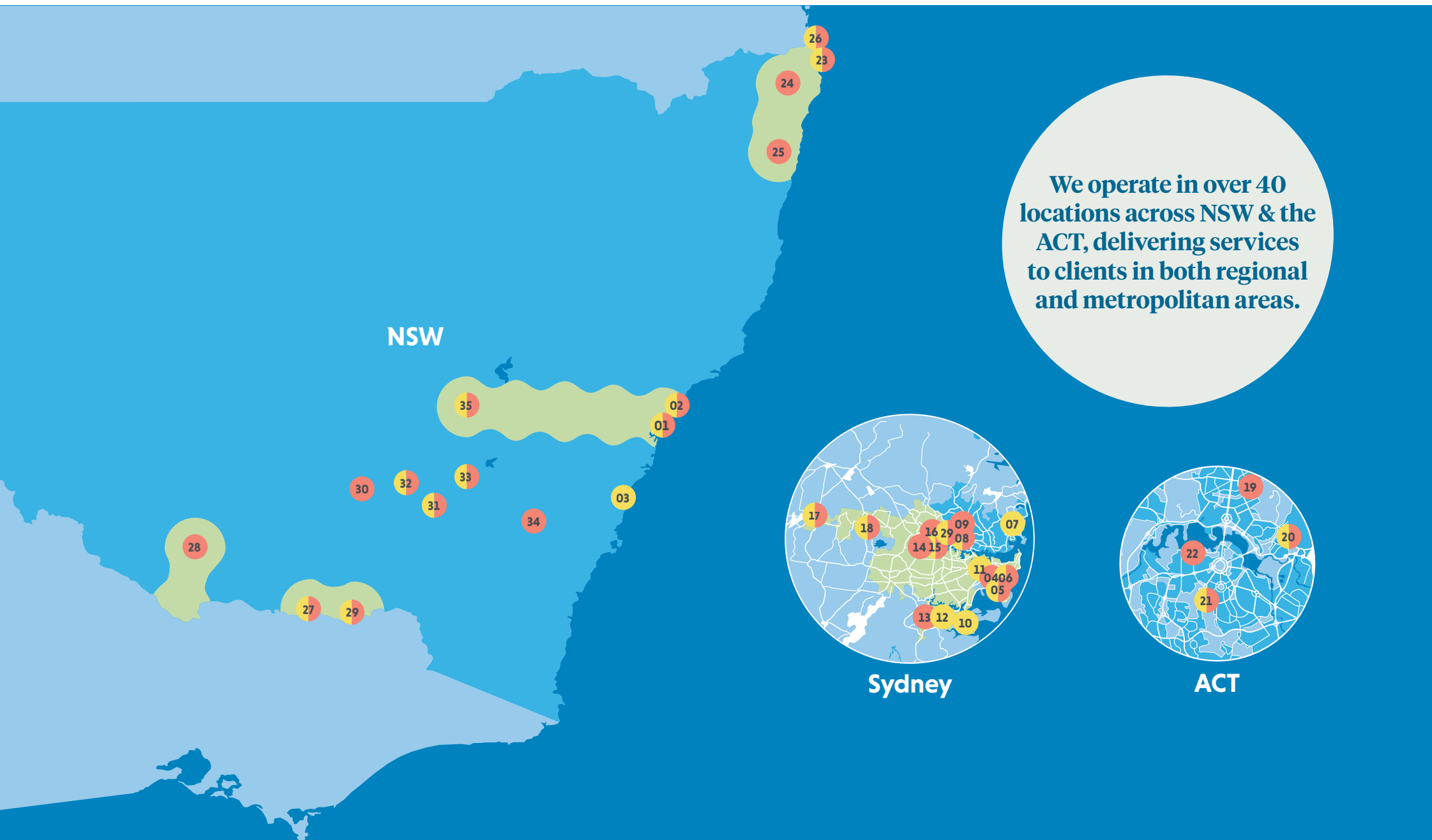
Southern Cross Care (NSW & ACT) relies on a diverse and complex supply chain to deliver essential services to older Australians across Residential Aged Care, Support at Home, and Retirement Living. Our supply partners range from large national providers to small local businesses, with the majority based in Australia.

This enables us to maintain strong relationships, support the local economy, and uphold shared values of dignity, integrity, and care.

Goods and services are sourced across a wide range of categories, including:

- * Clinical and care services, including medical equipment and consumables, pharmaceuticals, infection control supplies, and personal protective equipment (PPE).
- * Hospitality and domestic services including catering, food and beverage supply, linen, laundry, cleaning, and waste management.
- * Facilities and property management including construction, maintenance, capital works, and refurbishment of aged care homes and retirement villages.
- * Information and communications technology including software and hardware, digital infrastructure, cybersecurity services, and system support.
- * Corporate and professional services including legal, financial, human resources, communications, marketing, insurance, and audit services.
- * Utilities and fleet including energy, water, telecommunications, vehicle leasing, and transport logistics.
- * Labour and workforce including agency staffing, recruitment providers, consultants, and contractors, including a small cohort of visa holders.

Where you can find us



NSW Metropolitan

Central Coast

- 01 Bateau Bay 
- 02 Caves Beach 

Illawarra Shoalhaven

- 03 Thirroul 

Sydney East

- 04 Daceyville 
- 05 Maroubra 
- 06 South Coogee 

Sydney North

- 07 Manly Vale 
- 08 Marsfield 
- 09 North Turramurra 

Sydney South

- 10 Caringbah 
- 11 Marrickville 
- 12 Kirrawee 
- 13 Sutherland 

Sydney West

- 14 Greystanes 
- 15 Merrylands West 
- 16 North Parramatta 
- 17 Penrith 
- 18 Plumpton 

ACT

- 19 Braddon 
- 20 Campbell 
- 21 Garran 
- 22 Yarralumla 

NSW Rural & Regional

Northern NSW

- 23 Banora Point 
- 24 Casino 
- 25 Grafton 
- 26 Tweed Heads South 

Riverina

- 27 Corowa 
- 28 Deniliquin 
- 29 Lavington 
- 30 Leeton 

South West Slopes

- 31 Cootamundra 
- 32 Temora 
- 33 Young 

Southern NSW

- 34 Goulburn 

Western NSW

- 35 Parkes 

Legend

-  Retirement Villages
-  Residential Care
-  Support at Home

Criterion 3

Modern Slavery risks

Southern Cross Care (NSW & ACT) recognises that modern slavery risks may exist within both our operations and supply chains. In 2025, SCC continued to assess these risks through internal risk assessment processes and participation in the Australian Catholic Anti-Slavery Network (ACAN) Modern Slavery Risk Management Program.

Supply chain risks

Our modern slavery risks are defined by the ACAN Category Risk Taxonomy, a classification standard that identifies the severity of actual or potential harm to people (saliency) in spend categories.

The ACAN Category Risk Taxonomy is based on sources such as:

- * the Global Slavery Index
- * the International Labor Organisation (ILO), including definitions of modern slavery
- * the Bureau of International Labor Affairs (ILAB), U.S Department of Labor
- * the Global Child Forum and UNICEF

Five key factors are also used to determine the level of risk:

- * **Geography:** the country or location where a good is made or service is delivered
- * **Industry:** the sector in which the making of goods or delivery of service occurred
- * **Commodity:** the raw materials or components that comprise the goods or products
- * **Workforce vulnerability:** such as bonded visas, temporary migrants, women or children known to be employed in specific industry sectors
- * **Domus 8.7:** trends, cases, and risk intelligence identified through the Domus 8.7 remediation service, including grievances and remediation insights relevant to category and risk to workers.

SCC's procurement activities span multiple categories and involve a diverse supplier base. Through our collaboration with ACAN and using ACAN's Category Risk Taxonomy, we have identified elevated risk in the following supplier categories:



Low Risk	Medium Risk	High Risk
• Professional services • Financial expenses • Government and agency fees • License / membership fees	• Advertising & Marketing • ICT Software and network services - onshore • Utilities • Fleet management, consumables and maintenance • Travel and accommodation • Print / Mail Provider	• Building and construction • Cleaning and Security • Events and event management • Facility management and property maintenance • Finance and Investment • Food and catering services • Furniture and office supplies • ICT Hardware • ICT Software and network services - offshore • Labour Hire • Linen, laundry and textile products • Medical devices and supplies • Transport, logistics and warehousing • Uniforms and PPE • Waste management services

People risks

Modern slavery risks may also arise within operations, particularly where contracted or agency labour is engaged. While the majority of SCC's workforce is directly employed under enterprise agreements or employment contracts, reliance on third party labour for specialist or surge capacity needs can increase vulnerability.

SCC actively promotes awareness of modern slavery by providing ongoing training and maintaining open communication. This ensures that our colleagues can identify warning signs and are well equipped with the necessary procedures and appropriate channels.

Although no instances of modern slavery have been identified within SCC's operations, the organisation acknowledges the hidden nature of exploitation and remains vigilant through training, monitoring and governance controls.

Criterion 4

Actions taken to assess and address risks

In 2025, SCC continued its active membership with ACAN, supporting sector wide collaboration, knowledge sharing and benchmarking. ACAN engagement informs SCC's risk identification methodology, supplier engagement approach and continuous improvement planning.

Strategic partnerships and governance

Southern Cross Care (NSW & ACT) maintained active membership in the ACAN, fostering sector-wide collaboration and leveraging ACAN's supplier engagement support. Since joining in 2020, our partnership has enabled us to access ACAN's data-driven supply chain risk assessment tools, systematic evaluation using the ACAN Risk Taxonomy, and the purpose-built ROTA platform for centralising risk management activities and supplier performance monitoring. Through ongoing participation, we have engaged in peer benchmarking, knowledge sharing, and joint submissions to the modern slavery public register, while ACAN's involvement in our Modern Slavery Working Group meetings has provided expert guidance and enriched our strategy.

Supplier engagement and risk management

In 2025, we analysed \$126 million in spend across 1,651 suppliers and 30 procurement categories using our spend management platform. This enabled targeted risk assessments by sector, geography and spend.

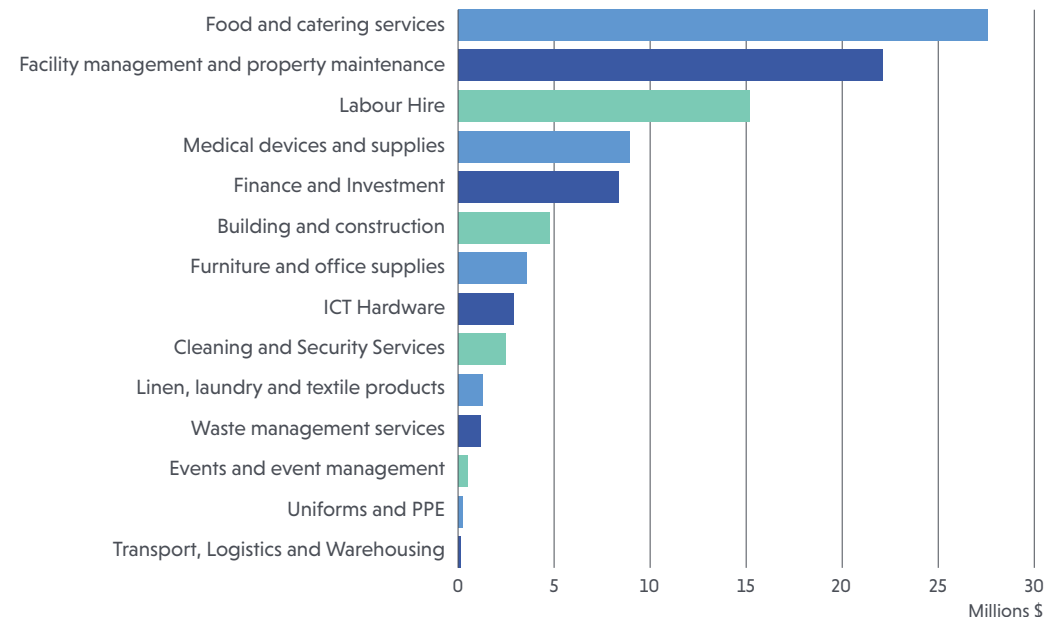
Our methodology encompasses the use of the ACAN Supplier Survey to collect essential details regarding supplier operations, the implementation of targeted supplier education initiatives addressing key risk areas, onboarding suppliers onto Sedex and facilitating completion of the Self-Assessment Questionnaire (SAQ), conducting desktop reviews to determine necessary actions, and strengthening supplier screening processes through Know Your Client (KYC) intelligence software.

To address emerging needs, SCC has incorporated provisions within its standard terms requiring suppliers to undergo Corporate Social Compliance Audits when required. These audits provide objective, independent, and timely assessments of suppliers' adherence to local regulations and worker wellbeing standards, serving as crucial checkpoints for ongoing compliance and ethical conduct.

We evaluate selected suppliers operating in high-risk categories using the Domus 8.7 Index modern slavery statement assessment. This enables us to identify opportunities for improvement where SCC can collaborate on targeted initiatives with our suppliers to effectively mitigate potential risks related to modern slavery and human rights abuses within our supply chain.

We also utilise the ACAN Prequalified Supplier Directory, a curated register of preferred suppliers accessible to Catholic organisations, to streamline the selection of vendors who meet defined compliance and ethical benchmarks.

2025 Supplier Spend by Category



By integrating these tools and methodologies into our procurement processes throughout the supplier lifecycle, we maintain a comprehensive and proactive framework. This approach promotes transparency, accountability, and robust risk mitigation.

Key actions included:

- * Updated SCC contracts mandating high risk suppliers to onboard with SEDEX, ensuring ongoing engagement and transparent reporting in line with our compliance and ethical standards.
- * We launched a dedicated supplier management tool. This platform provides SCC with enriched data and advanced analytics, supporting more informed decision-making, supplier onboarding, ongoing monitoring, and continuous improvement across our supply chain.
- * Featuring our modern slavery statement in the internal Take 5 publication, accompanied by an endorsement from the Chair of the Board.

By aligning our efforts with ACAN's supplier engagement framework including the ROTA platform, comprehensive risk taxonomy, and structured supplier evaluation tools, we demonstrate a robust, collaborative, and transparent modern slavery risk management program.

Training and awareness

In 2025, Southern Cross Care (NSW & ACT) continued to advance its modern slavery education and training program across the organisation.

- * Our e-learning module was introduced into the learning package, and completed by 859 staff members
- * Training completion rates across teams reached an organisational average of 95%, with the Executive Team achieving 100% participation.
- * SCC expanded its Learning Management System (LMS) with a new Modern Slavery training module developed by ACAN, focusing on business relevance, grievance, and remedy. The Modern Slavery Working Group has approved the content and SCC plans to launch these courses for its leaders in 2026.
- * At the 2025 Southern Cross Care (NSW & ACT) Conference, ACAN facilitated breakout sessions with senior SCC leaders and Aged Care Residential Managers to enhance education and reinforce best practices in daily operations.

The Southern Cross Care (NSW & ACT) intranet continues to be updated with modern slavery statistics from the Global Slavery Index, relevant news articles, and video resources to increase awareness and staff understanding of the issue in both global and local contexts.

Criterion 4

Actions taken to assess and address risks



Grievance mechanisms and reporting

Southern Cross Care (NSW & ACT) now offers a range of confidential reporting channels for modern slavery risks, including the recent addition of an independent external hotline Domus 8.7 to further safeguard staff concerns.

- * A whistleblower hotline is available to all employees for reporting misconduct, including concerns related to modern slavery.
- * A dedicated supplier grievance channel is managed by our procurement team. While no modern slavery-related complaints were received in 2025, Southern Cross Care (NSW & ACT) remains vigilant and ready to respond.
- * In the event of a breach, Southern Cross Care (NSW & ACT) commits to engaging with the relevant supplier within 24 hours and works closely with ACAN to support remediation.
- * Broadened grievance and remediation channels by implementing the 24-hour Domus 8.7 hotline that remains independent from SCC operations to help with reinforcing independence if our team suspects Modern Slavery indicators are present

Southern Cross Care (NSW & ACT) is a founding member of Domus 8.7. Domus 8.7 was established as an agency of the Catholic Archdiocese of Sydney in 2020 as a key element of the ACAN Modern Slavery Risk Management Program. This collaborative approach to remediation is aligned with the Modern Slavery Act and Catholic Social Teaching which are centred on the needs, wellbeing and empowerment of people impacted.

Domus 8.7 provides Southern Cross Care (NSW & ACT):

- * resources that enable us to listen to workers (grievance channel)
- * a 24/7 careline for workers on our sites, staffed by professional counsellors

- * direct support to people impacted by modern slavery
- * guidance and technical assistance to prevent, identify and remediate modern slavery
- * a documented process to assess if an organisation has caused, contributed or is directly linked to modern slavery and modern slavery indicators

Domus 8.7 empowers people impacted by modern slavery to have choice and control over what forms of remediation are meaningful to them and to engage safely with business/supply chain actors. Supports may include:

- * modern slavery indicator assessment
- * needs assessment, case coordination, response and remediation planning
- * referrals to community, social services, unions
- * transport, accommodation, financial and food support
- * legal support, referrals, accompaniment and advocacy
- * job training, retraining and redeployment
- * accompaniment and advocacy to engage with government and law enforcement agencies
- * opportunities to contribute lived expertise to improve modern slavery responses

The Domus 8.7 Advisory Committee Members also include a person with lived expertise, Mr Moe Turaga. Domus 8.7 is a registered charity with the Australian Charities and Not-for profits Commission (ACNC) and is an endorsed Public Benevolent Institution with Deductible Gift Recipient (DGR) status. ABN 244 72497189

Communication and ongoing engagement

Southern Cross Care (NSW & ACT) recognises that fostering awareness and maintaining open communication are essential to sustaining a culture that actively identifies and responds to modern slavery risks. In 2025, we continued to implement a range of communication and engagement initiatives designed to enhance understanding across our workforce and the broader community.

- * Southern Cross Care (NSW & ACT) collaborated with suppliers to support the development of modern slavery awareness and risk management practices where there was limited prior exposure, and communicated our progress through our internal newsletter publication Take 5 in October 2025.
- * In June 2025, the signed Modern Slavery Statement was featured on our external website, accompanied by a message from the Chair of the Board, reaffirming our dedication to ethical integrity and transparency.
- * An open invitation webinar was held in partnership with ACAN for all internal staff, providing an opportunity to participate, ask questions, and discuss the implications of Modern Slavery on our organisation. The session also introduced the establishment of Domus 8.7 within our reporting channels.

Criterion 5

Assessing our effectiveness

In 2025, SCC continued to strengthen its approach to assessing the effectiveness of modern slavery risk management activities. Through ACAN, SCC participates in a data-driven risk management framework, including the transition to globally recognised measurement methodologies through Sedex.

Effectiveness is monitored through supplier participation in ACAN programs, completion of training and capacity-building initiatives, tracking of corrective actions, utilisation of grievance mechanisms and baseline analytics provided by ACAN. These measures establish a benchmark for year-on-year improvement and inform future prioritisation.

Continuous improvement

Collaboration is at the heart of accelerating progress. This also includes opportunities to comparatively measure social, environmental and governance (business ethics) risks and actions with peers in our network.

In its foundational stages, Southern Cross Care (NSW & ACT) used an internally devised ACAN framework to measure progress. This bespoke approach reflected the unique priorities, constraints, and practices across Catholic organisations.

In 2025, the ACAN Program adopted a globally recognised risk measurement system through SEDEX. This aligns reporting entities with a methodology that combines global data about risks in different countries and industries with site-specific information from the SEDEX platform. SEDEX regularly updates the methodology to ensure it is aligned with new and emerging risks. Therefore, completion of the SEDEX SAQ completed by Southern Cross Care (NSW & ACT) is a substantial measure of continuous improvement year on year. Below is an explanation of how scoring is calculated using the SEDEX SAQ and SCC's 2025 risk scores and management controls that will serve as our benchmark for continuous improvement.

Combined & Inherent Risk Score

Explanation of Scoring

Combined Risk Score 3.8/10 - calculated from inherent risk and site characteristics, adjusted for management controls and audit results. The score is broken down by pillar and highlights strengths and opportunities to focus our efforts on key areas that drive ethical and sustainable practices.

3.8/10
Low risk

Inherent risk score

Inherent Risk Score 3.4/10 - predicts potential risks based on a country/region, and sector. Spanning all four pillars, this score is broken down by topics.

3.4/10
Low risk

- * Labour Standards Pillar - assesses location and industry factors that could increase labour risks, such as vulnerable worker populations or high rates of workplace violations.
- * Health and Safety Pillar - considers regional and industry-specific health and safety risks, including local regulations and industry accident rates.
- * Business Ethics Pillar - assesses industry and location risks related to unethical practices, such as high corruption levels or weak regulatory oversight.
- * Environment Pillar - examines the environmental impact of the site's industry and location, such as pollution levels or resource use that may create regulatory or compliance risks.

3.3/10

Labour standards

4.6/10

Health & safety

2.6/10

Business ethics

3.5/10

Environment

Site Characteristics Risk

Drivers include:

- * Labour standards - reflects labour-related risks like employment practices, workers' rights and wages based on SAQ responses. High-risk activities in this area can raise the score.
- * Health and Safety - based on SAQ responses to questions about site-specific health and safety factors, such as equipment usage, handling of chemicals or accident risks.

7.4/10
Labour standards

4.7/10
Health & safety

6.6/10

High risk

Management Controls

This score measures how well policies or processes are in place to reduce the risks from the site characteristics.

4/5

Drivers include:

- * Labour standards - evaluates policies and processes to ensure fair labour standards and worker protections are effectively managed.
- * Health and Safety - reviews the adequacy of safety protocols, emergency preparedness and training efforts to manage health and safety risks on site.
- * Business Ethics - evaluates controls against unethical practices such as anti-bribery policies, compliance with legal standards and transparent operations.
- * Environment - looks at policies managing environmental impact, resource efficiency and waste reduction practices to align with sustainability standards.

4/5
Advanced
Labour standards

3.9/5
Good
Health & safety

2.7/5
Moderate
Business ethics

2.2/5
Moderate
Environment

The ACAN baseline data table provides a comparative measure of supplier engagement and program activities to measure progress and inform future action planning.

ACTIVITY	2024	2025
Hours spent on modern slavery activities	100	130
Individual staff completed e-learning	1882	919
E-learning modules completed	6	919
Total number of suppliers	1861	1651
Number of suppliers with visible contact information and ABN	1687	1609
Number of suppliers across high-risk categories	835	1004
Number of ACAN Supplier Surveys completed*	184	421
Supplier staff attending capacity building webinars	32	23
Invited to join Sedex*	19	80
Joined Sedex*	49	50
Sedex SAQ completed*	9	32
Social audits	1	0
Corrective actions	26	0
Contacts made via worker voice / grievance mechanism	30	
Referrals for advice and assistance	0	
Individuals identified or referred for modern slavery	0	
Individuals with modern slavery cases remediated	0	

*cumulative

Criterion 5

Assessing our effectiveness

	Southern Cross Care (NSW & ACT) Goals	Target	Date	Status	Update
1.a	Ensure our recruitment policy and procedures are well-documented and regularly reviewed to ensure Southern Cross Care (NSW & ACT) remains vigilant against potential risks.	Ensure recruitment policies are updated, reviewed, and aligned to prevention practices	2025	Completed	Recruitment policies are now consistently updated, reviewed, and aligned with prevention practices. This approach supports Southern Cross Care (NSW & ACT) in maintaining robust safeguards against potential risks, reinforcing our dedication to ethical integrity and the protection of vulnerable individuals within our community.
1.b	Attend monthly Modern Slavery ACAN webinars.	Ensure consistent attendance and participation.	Monthly	Completed	Southern Cross Care (NSW & ACT)'s Modern Slavery Steering Committee maintains active engagement with national best practice by participating in monthly Australian Catholic Anti-Slavery Network (ACAN) webinars.
1.c	Continue to educate and train Southern Cross Care (NSW & ACT) staff to understand and recognise the signs of Modern Slavery.	Deliver ongoing training programs.	2025	Completed	Southern Cross Care (NSW & ACT) implemented modern slavery training across its workforce, achieving organisational average of 90%, with the Executive Team achieving 100% participation. A dedicated all staff webinar was held in December 2024 to reinforce awareness and obligations.
1.d	Remind Southern Cross Care (NSW & ACT) staff about Southern Cross Care (NSW & ACT)'s commitment and obligations under the Modern Slavery Act.	Conduct regular awareness sessions.	Bi-annually	Completed	Internal communications have continued to highlight Southern Cross Care (NSW & ACT)'s responsibilities under the Modern Slavery Act, including regular updates through staff newsletters and leadership communications.
1.e	Include a Modern Slavery segment in the annual Southern Cross Care (NSW & ACT) conference.	Include Modern Slavery segment in the conference agenda.	Annual	Completed	During the 2025 conference, interactive breakout sessions were conducted in collaboration with ACAN, offering SCC Leaders a comprehensive exploration of modern slavery prevention. These sessions equipped leaders with a deeper understanding of why addressing modern slavery is critical and provided practical guidance on identifying potential warning signs within their teams. Following the presentations, the Q&A segment allowed participants to clarify procedures and discuss real-world scenarios, ensuring that SCC Leaders left with actionable knowledge and enhanced confidence in supporting team members and upholding SCC's commitment to ethical integrity.

	Southern Cross Care (NSW & ACT) Goals	Target	Date	Status	Update
1.f	Attend quarterly Modern Slavery Steering Committee meetings.	Ensure representation at all quarterly meetings.	Quarterly	Completed	Quarterly Steering Committee meetings are held to oversee Southern Cross Care (NSW & ACT)'s Modern Slavery strategy and monitor progress. Outcomes are formally documented and inform ongoing actions. ACAN has also been invited to attend and present at key meetings.
1.g	Ask our top 75 suppliers by spend to review and sign Southern Cross Care (NSW & ACT)'s Modern Slavery Attestation Statement	a. Achieve 100% review completion from top 50 suppliers. b. Achieve 100% supplier agreement from top 50 suppliers.	2025	Completed	Southern Cross Care (NSW & ACT) achieved 100% attestation from its top 75 suppliers by spend, confirming their review and agreement to Southern Cross Care (NSW & ACT)'s Modern Slavery Attestation Statement and supplier code of conduct.
1.h	Publish regular reports to stakeholders of Southern Cross Care (NSW & ACT)'s efforts and achievements	Form a strategic partnership and initiate a joint project.	2025	Completed	Throughout 2025, we collaborated with Bunzl on a joint initiative to replace all high-risk, non-compliant products purchased by SCC with Bunzl-certified alternatives. By December, we had identified substitutes for all non-compliant items, significantly reducing our exposure beyond our direct partnership with Bunzl. We are committed to maintaining this positive momentum into 2026.
1.i	Add content to Southern Cross Care (NSW & ACT)'s external website to remind our customers and suppliers about modern slavery risks	Publish content to the Suppliers & Procurement section of the Southern Cross Care (NSW & ACT) internet	2025	Completed	Southern Cross Care (NSW & ACT) successfully published its 2024 Modern Slavery Statement in the Suppliers & Procurement section of our internal internet. This initiative reinforces our ongoing commitment to transparency and ethical sourcing, ensuring all suppliers and procurement partners are kept informed of our efforts and standards regarding modern slavery risks and mitigation strategies.
1.j	Expand modern slavery training programs for the Procurement Team, to recognise and address modern slavery risks	All Procurement team members to complete modern slavery training modules two and three from ACAN	2025	Completed	All Procurement team members completed ACAN modern slavery training modules two and three, achieving full participation. The training was also extended to the Modern Slavery Working Group, and this roll out will continue in 2026.

Criterion 6

Consultation

As a single reporting entity, Southern Cross Care (NSW & ACT) undertakes internal consultation through structured cross-functional engagement. Our Modern Slavery Working Group, comprising representatives from procurement, legal, people and culture, marketing and communications, information technology, and operations, meets quarterly to review progress, assess risk, and guide strategic priorities.



Criterion 7

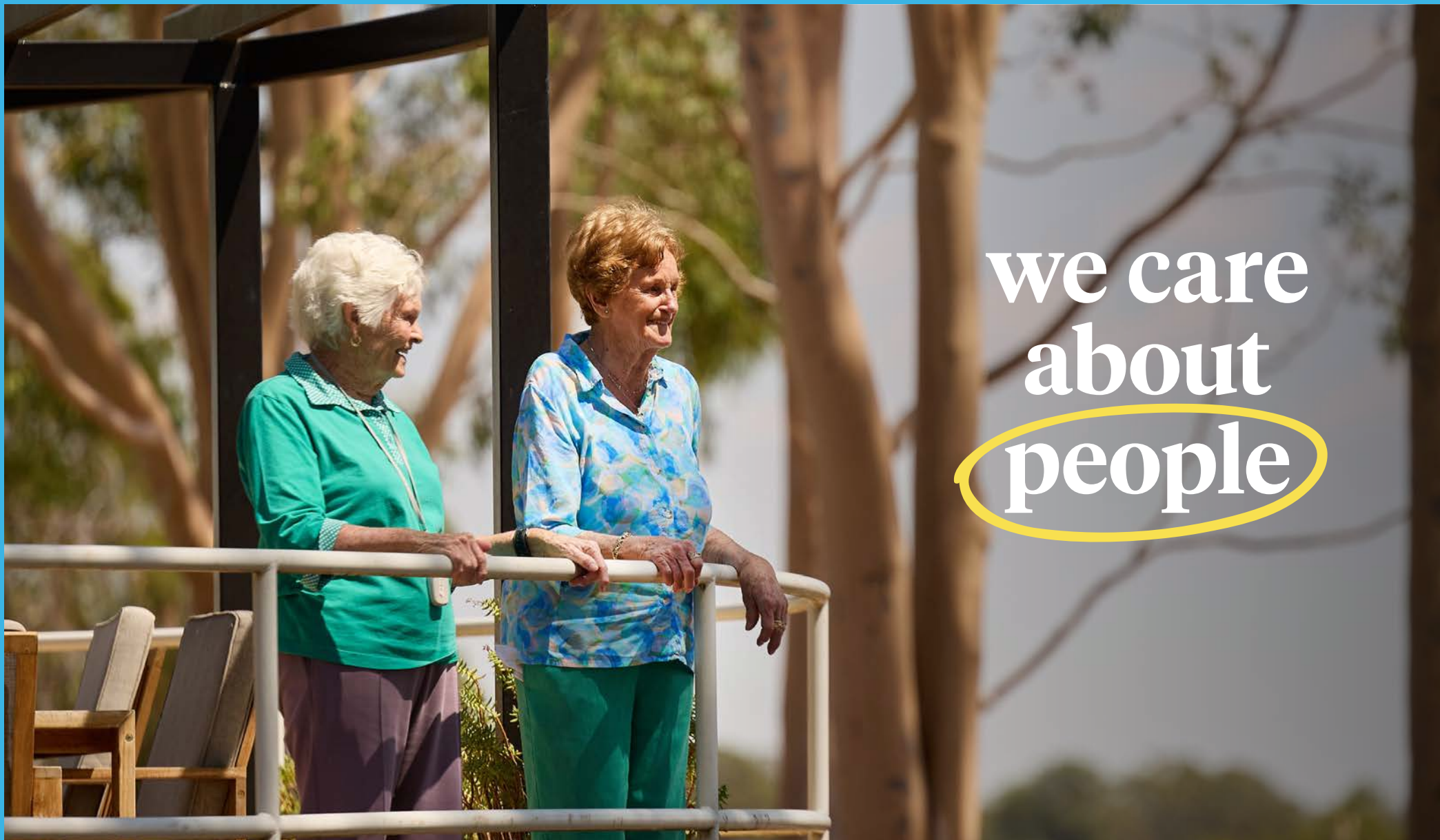
Future actions

In 2026, Southern Cross Care (NSW & ACT) will continue to enhance its response to modern slavery through governance, supplier engagement, training and transparency initiatives. Future actions include strengthening supplier engagement through ACAN, expanding training for staff and procurement teams, embedding modern slavery considerations into vendor reviews, and continuing collaboration with strategic suppliers to reduce risk within supply chains.

Southern Cross Care (NSW & ACT) Goals		Target	Date	Responsibility
1.a	Assess and prioritise the availability of domestic manufacturing options for required goods to support local industry, ensure supply chain transparency, and reduce modern slavery risks.	Identify and propose domestic manufacturing alternatives where feasible, and provide supporting evidence regarding sourcing, production, and labour practices within Australia.	2026	Procurement
1.b	Attend monthly modern slavery ACAN webinars	Ensure consistent attendance and participation.	Monthly	Procurement
1.c	Continue to educate and train Southern Cross Care (NSW & ACT) staff to understand and recognise the signs of modern slavery.	All Leaders at Band 4 or higher to complete modern slavery training modules two and three from ACAN	2026	People & Culture, Procurement
1.d	Remind Southern Cross Care (NSW & ACT) staff about Southern Cross Care (NSW & ACT)'s commitment and obligations under the modern slavery Act	Conduct regular awareness sessions.	Annual	People & Culture, Procurement
1.e	Include a modern slavery segment in the annual Southern Cross Care (NSW & ACT) conference	Include modern slavery segment in the conference agenda.	Annual	CEO, People & Culture, Procurement
1.f	Attend quarterly modern slavery Steering Committee meetings	Ensure representation at all quarterly meetings.	Quarterly	All
1.g	Ensure active SEDEX participation and onboarding for our top 50 high risk suppliers to enhance transparency and address modern slavery risks within our supply chain	Achieve 100% completion from top 50 suppliers	2026	Procurement
1.h	Maintain compliance of high-risk goods by strategically partnering with approved and reliable suppliers across all tiers of the supply chain, not just the first-tier, to ensure robust oversight and adherence to ethical standards	Transition of the Top 150 products purchased by SCC into closed basket of goods, accessible exclusively through our digital purchasing platform	2026	Procurement
1.i	Add content to Southern Cross Care (NSW & ACT)'s external website to remind our customers and suppliers about modern slavery risks	Publish content to the Suppliers & Procurement section of the Southern Cross Care (NSW & ACT) internet	2026	Procurement, Marketing and Communications
1.j	Establish consistent controls for contractor arrangements to mitigate modern slavery risks	Expand the use of our Contractor Management System to include mandatory pre-engagement due diligence checks and ongoing visa compliance monitoring for all labour hire contractors	2026	Procurement
1.k	Enhance organisation-wide engagement in modern slavery prevention by broadening staff and working group participation	Increase cross-departmental representation in the Modern Slavery Working Group to ensure diverse perspectives and stronger collaboration across all business units.	2026	All
1.l	Develop and publicly articulate a SCC Human Rights commitment that reinforces our dedication to upholding human rights and labour standards, supporting and enhancing our existing Modern Slavery Policy and Supplier Code of Conduct.	Draft, approve, and publish a formal written statement of SCC's commitment to human rights and labour standards, ensuring it is accessible to all stakeholders and effectively complements current policies and codes.	2026	CEO, People & Culture, Marketing and Communications

Glossary

ACAN	Australian Catholic Anti-Slavery Network	MSLO	Modern Slavery Liaison Officer
ACNC	Australian Charities and Not-for-profits Commission	NDIS	National Disability Insurance Scheme
ACT	Australian Capital Territory	NSW	New South Wales
ABN	Australian Business Number	PPE	Personal Protective Equipment
CEO	Chief Executive Officer	RAC	Residential Aged Care
CFO	Chief Financial Officer	ROTA	Risk management platform referenced by ACAN (name used as-is in document)
DGR	Deductible Gift Recipient	SAH	Support at Home
ICT	Information and Communications Technology	SAQ	Self-Assessment Questionnaire
IT	Information Technology	SCC	Southern Cross Care (NSW & ACT)
ILO	International Labour Organization	SEDEX	Supplier Ethical Data Exchange, a global membership organisation that provides a platform for businesses to manage and improve ethical performance in supply chain
ILAB	Bureau of International Labor Affairs (U.S. Department of Labor)	SKU	Stock Keeping Unit
KYC	Know Your Client	WHS	Work Health and Safety
LMS	Learning Management System		
MS	Modern Slavery (used contextually)		



we care
about
people

Every moment matters



Modern Slavery Statement

Statement for period 1 January 2025 to 31 December 2025



Acknowledgement of Country



St John of God Health Care acknowledges and pays respect to the Traditional Custodians of the lands on which we work and live. We offer our respect to Elders, past and present, and recognise their cultural heritage, beliefs and continuing connection to Country. We express our gratitude that we share this land today. We also acknowledge the pain of history and commit to creating a path of healing. We hope and believe that we can move to a place of equity, justice and partnership together.



A collaborative artwork by the Djookanka Sisters and St John of God Health Care caregivers

Disclosure notes

This is a joint modern slavery statement made by St John of God Health Care Inc (ARBN 051 960 911) on behalf of itself and the entities it controls or owns, including:

St John of God Hawkesbury District Health Campus Ltd (ACN 608 054 379) - (St John of God Hawkesbury handed back to NSW on 1 July 2024)

St John of God Outreach Services (ACN 064 831 965)

St John of God Foundation Inc (ARBN 066 805 132)

St John of God Midland Health Campus Ltd (ACN 152 874 845)

Dencross Pty Ltd (ACN 086 647 298)

St John of God Berwick Health Campus Ltd (ACN 606 404 915)

Marillac (ACN 050 463 717) together, for the purposes of this statement “St John of God Health Care”.

St John of God Health Care Inc ARBN: 051 960 911

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Statement from the Board Chair and Group CEO

St John of God Health Care is guided by our Mission and Values of Hospitality, Compassion, Respect, Justice and Excellence. These values shape how we care for people and how we act, including our responsibility to uphold human dignity in the way goods and services are sourced.

We stand against modern slavery and exploitation in any form, recognising these harms are often hidden within complex global supply chains and require ongoing vigilance. This includes working closely with suppliers and partners to strengthen transparency, uphold human rights, and support fair and responsible sourcing practices.

We are proud to present our sixth Modern Slavery Statement, reflecting the progress made in strengthening our understanding of modern slavery risks and the actions taken to address them.

Capability has continued to grow, with no material incidents identified through reporting and assurance processes during 2025.

During the reporting period, governance, supplier engagement, risk visibility and remediation capability were further strengthened. Our modern slavery program continues to demonstrate consistent capability across key areas, with steady performance reflected in our latest assessment. Encouraging progress has been made in worker engagement and operations, strengthening how risks are managed in day-to-day practice.

Our approach is supported through ongoing collaboration with the Australian Catholic Anti-Slavery Network (ACAN), Catholic Health Australia (CHA) and the Catholic Negotiating Alliance (CNA), alongside continued improvement across our operations and supply chains.

This Statement reflects our clear responsibility to protect human dignity and to take meaningful, sustained action to prevent modern slavery in all its forms.



Hon Kerry Sanderson AC CVO
Board Chair



Bryan Pyne
Group Chief Executive Officer

This Statement was approved by the Board of St John of God Health Care Inc, the principal governing body on 29 May 2026 and signed by the Board Chair and Group Chief Executive Officer in accordance with the Modern Slavery Act 2018 (Cth).

About us

St John of God Health Care is a leading not-for-profit, for-purpose provider of high-quality health care and community services. We play a vital role in Australian health care and exist to benefit the community by supporting our patients, our caregivers, and those with the greatest unmet health needs.

Our commitment to compassionate, Mission-driven care runs deep. Established in 1895 by the Sisters of St John of God, we remain inspired by their generous spirit to go beyond what might be expected.

Today, we are one of Australia's largest private hospital operators and not-for-profit Catholic health care providers. We employ more than 15,000 dedicated caregivers across Australia, New Zealand and the wider Asia-Pacific region. We operate 25 outstanding health care facilities with more than 3,200 beds and provide a wide range of free community wellbeing support services, health care at home and disability services.



Our Symbol

The pomegranate symbol represents our heritage — as the original symbol of the Sisters of St John of God — and our Vision for the future. The cross is the symbol of Christianity, reminding us of Jesus' suffering and our call to follow in His footsteps. Our five Values are reflected in the five seeds of the pomegranate, which is open to allow the seeds to scatter, providing new life and symbolising the generosity of self-giving to people in need.



25

facilities



15,000+

caregivers



3,200

beds



\$2.2b

revenue

As at 30 June 2025

Vision

We are recognised for care that provides healing, hope and a greater sense of dignity, especially to those most in need.

Mission

To continue the healing mission of Jesus.



Service Ethos

Service is central to how we bring the Mission to life at St John of God Health Care. Our development programs aim to support and equip our caregivers with contemporary and best in class capability in providing exceptional service.

The key tenets of our Service Ethos are:

- Our Mission inspires our service – we are continuing a great story of service entrusted to us by our founders.
- Relationships are central – every encounter is an opportunity and can have far-reaching effects.
- The way we work together as a community, in our own teams and with other teams, is integral in our effectiveness.
- Governance and management of resources are key to our success.
- Feedback and evaluation about how well we are doing is crucial.





Reporting Entities

Mandatory Criteria 1 — Identify the reporting entity

This joint statement is submitted by St John of God Health Care Inc (ARBN 051 960 911) as the principal reporting entity on behalf of itself and the entities it owns or controls, in accordance with section 14 of the Modern Slavery Act 2018 (Cth).

The principal reporting entity is St John of God Health Care Inc, a body corporate registered under the Corporations Act 2001. It is the parent entity of the group and is responsible for the preparation, approval and submission of this statement.

There were no material changes to the reporting entities during 2025. St John of God Hawkesbury District Health Campus Ltd (ACN 608 054 379) was transferred to NSW Health on 1 July 2024 and is no longer included as a reporting entity.

The following table lists all reporting entities covered by this statement:

Reporting Entities Covered by this Statement

Entity Name	ABN/ACN	Role
St John of God Health Care Inc	ARBN 051 960 911	Principal reporting entity
St John of God Outreach Services	ACN 064 831 965	Controlled entity
St John of God Foundation Inc	ARBN 066 805 132	Controlled entity
St John of God Midland Health Campus Ltd	ACN 152 874 845	Controlled entity
Dencross Pty Ltd	ACN 086 647 298	Controlled entity
St John of God Berwick Health Campus Ltd	ACN 606 404 915	Controlled entity
St John of God Marillac	ACN 050 463 717	Controlled entity



Our Structure, Operations and Supply Chains

Mandatory Criteria 2 — Describe structure, operations and supply chains

How our modern slavery response fits within the St John of God Health Care Strategy.

St John of God Health Care's approach to modern slavery is embedded within its broader strategic, governance and ethical framework. The Modern Slavery & Ethical Supply Chain Framework translates organisational values and ESG commitments into practical, risk-based action across operations and supply chains.

Strategic Alignment

SJGHC's modern slavery response operates across four interconnected strategic layers: together, these layers ensure modern slavery risk management is not treated as a standalone compliance activity, but an integrated component of SJGHC's mission-driven strategy and enterprise risk approach.



Strategic Priorities: see our 2024-25 Annual Report <https://www.sjog.org.au/about-us/annual-report>

#	Strategic Layer	Description
1	Enterprise Strategy	Board and executive strategic priorities that guide organisational direction, performance and accountability.
2	ESG Roadmap (Social Pillar)	Commitment to human dignity, community wellbeing and ethical operations.
3	Modern Slavery & Ethical Supply Chain Framework	Risk-based framework that operationalises ethical sourcing and modern slavery commitments.
4	Annual Operating Plans & Delivery	Year-by-year implementation, monitoring and continuous improvement.

Governance and Organisational Structure

Organisational Structure

St John of God Health Care is a not-for-profit Catholic health care provider operating under a robust, two-tiered governance structure that ensures ethical leadership, accountability and strategic oversight.

- Trustees hold canonical responsibility and safeguard the organisation's Mission, Values and adherence to Catholic health care principles.
- Board of Directors is responsible for stewardship, strategic direction, financial sustainability and enterprise risk management.
- Executive Management, led by the Group Chief Executive Officer, oversees day-to-day operations and implements Board-approved strategies and frameworks.

This structure supports consistent oversight of modern slavery risks across SJGHC's operations and supply chains.

Governance Framework and Oversight

The Board is supported by Board Committees, including the Audit and Risk Committee (ARC), which provides independent oversight of:

- Risk management frameworks
- Regulatory and legislative compliance, including modern slavery obligations
- Internal controls, audit processes and reporting integrity

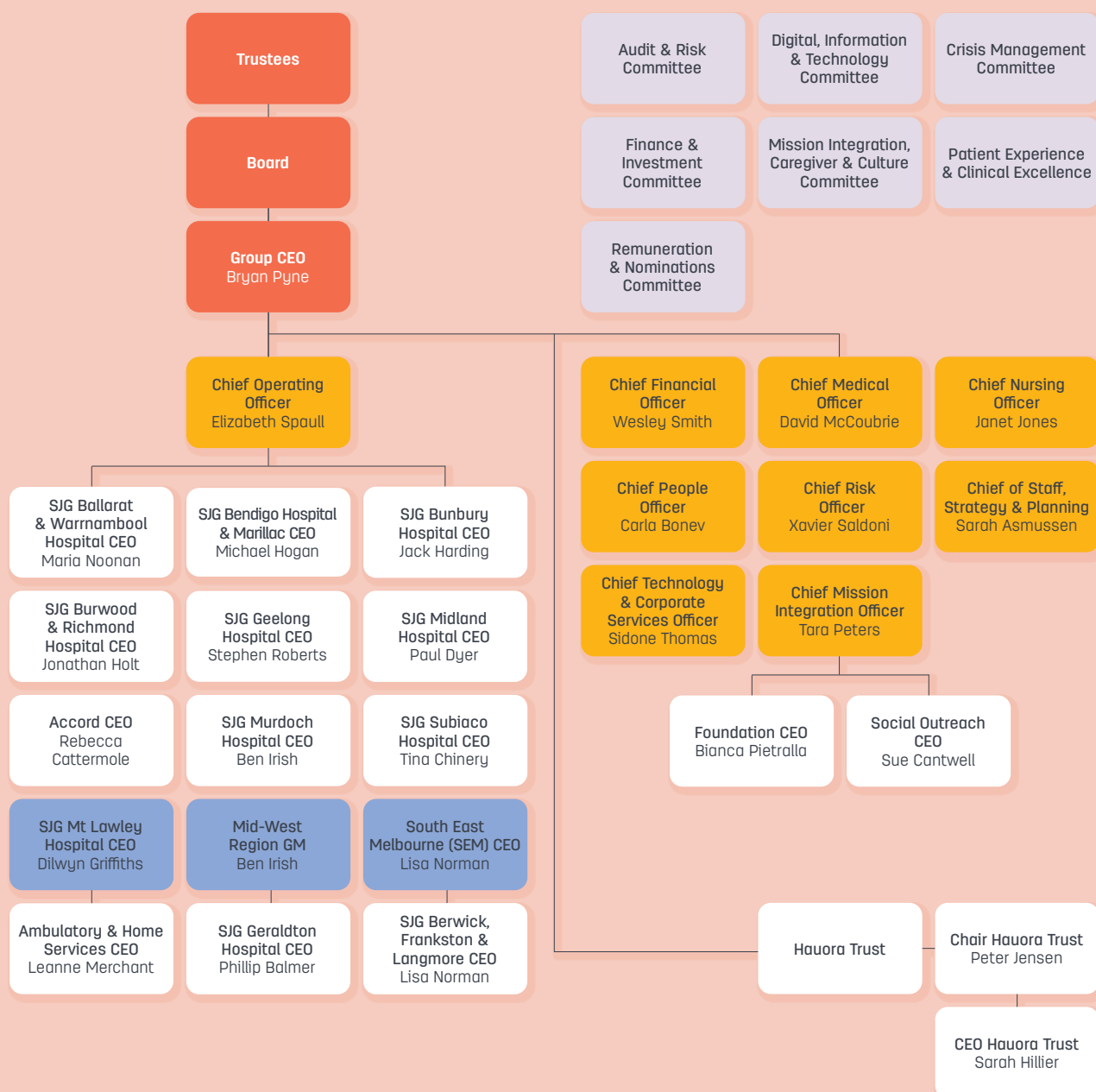
Modern slavery risk is managed alongside other material organisational risks through established governance, risk and compliance processes.

SJGHC applies recognised principles of good corporate governance, drawing on guidance from bodies such as the **ASX Corporate Governance Council**, to promote transparency, ethical procurement, financial integrity, workforce accountability and patient safety.

Roles, Responsibilities and Accountability

Clear accountability is maintained through formal governance instruments, including the St John of God Health Care Inc. Constitution, the Governance Authority Matrix, and the Management Authority Matrix. These documents define the delegated responsibilities of Trustees, the Board and management, ensuring clarity in decision-making, leadership accountability and implementation of ethical supply chain practices.

Organisational structure



Services

Our comprehensive services span a broad range of health and community care:

- **Medical and Surgical Services**
High-quality medical and surgical treatments across various specialties.
- **Mental Health Care and Therapy**
Inpatient and outpatient mental health services, including psychology, psychiatry and counselling.
- **Rehabilitation**
Comprehensive rehabilitation programs to support recovery from injury, illness or surgery.
- **Maternity**
Expert maternity care, including pregnancy, birth and postnatal services.
- **Cancer Care**
Comprehensive oncology services, including chemotherapy, radiation therapy and supportive care.
- **Cardiac Services**
Specialised heart care, including interventional cardiology and cardiothoracic surgery.
- **Emergency Medicine**
24-hour emergency departments providing immediate care for acute illnesses and injuries.
- **Allied Health Services**
A range of services including physiotherapy, occupational therapy, dietetics and speech pathology.
- **Palliative Care**
Compassionate support for patients with life-limiting illnesses.
- **Home Nursing**
Professional nursing care provided in the comfort of patients' homes.
- **Disability Support Services**
Assistance and services tailored to individuals with disabilities.
- **Telehealth Services**
Remote medical consultations and health care support through digital platforms.
- **Social outreach programs**
Homelessness support, drug and alcohol services, family services.
- **Public-private partnership hospital (Midland)**





Geographic Presence

St John of God Health Care operates across multiple Australian states and territories. Head Office is located at Level 1, 556 Wellington Street, Perth WA 6000.

- **Western Australia (Perth Metropolitan)**
Subiaco Hospital, Murdoch Hospital, Mt Lawley Hospital, Midland Public and Private Hospitals.
- **Western Australia (Regional)**
Bunbury Hospital, Geraldton Hospital.
- **Victoria**
Ballarat Hospital, Bendigo Hospital, Berwick Hospital, Geelong Hospital, Warrnambool Hospital, Frankston Rehabilitation Hospital, Langmore Centre (mental health).
- **New South Wales**
Burwood Hospital (mental health), Richmond Hospital (mental health).
- **New Zealand**
Halswell (Christchurch), Wellington.
- **Asia-Pacific**
Social Outreach presence in Timor-Leste.

Our People

St John of God Health Care employs more than 15,000 caregivers across Australia and the Asia-Pacific region. We are a values-driven and inclusive organisation that recognises and celebrates the diverse skills, experiences, and perspectives of our caregivers.

49.8%

of our workforce are professional nurses and midwives

79.24%

of caregivers are female

50%

of our Senior Executive are female

4,708

accredited specialist doctors provide care in our hospitals

929

volunteers support patients and visitors, contributing to a welcoming and compassionate environment

58

caregivers identify as Aboriginal

11

caregivers have disclosed a disability

As at 30 June 2025

Our Operations

The organisation operates 14 private hospitals across Western Australia, Victoria and New South Wales, specialising in acute care with renowned services in maternity, oncology and orthopaedics. This includes three specialist mental health hospitals and a dedicated rehabilitation hospital. Additionally, the organisation manages St John of God Midland Public Hospital under a public-private partnership. Collectively, these hospitals offer 3,288 beds.

In FY2024-25, our hospitals treated over 409,493 overnight and same-day patients and delivered more than 10,609 babies, maintaining our status as the largest provider of private maternity services in Western Australia.

St John of God Social Outreach Services

As a not-for-profit organisation, St John of God Health Care has a proud history of providing outreach services in areas of unmet need. Delivered by St John of God Social Outreach, these services are offered across 56 locations in Australia, either for free or at a low cost.

Social Outreach supported 5,946 individuals and provided 22,732 nights of stable accommodation. Services include community mental health counselling, specialist mental health support for new parents (Raphael Services), drug and alcohol services, and accommodation for those experiencing or at risk of homelessness (Horizon House and Casa Venegas). Internationally, teams collaborate with governments in the Asia-Pacific region, notably supporting workforce capability development in Timor-Leste.

St John of God Accord

For over 65 years, St John of God Accord has supported people with disabilities, specialising in individuals with intellectual disabilities across metropolitan Melbourne. Services include support coordination, therapy services, individualised support, school leaver employment supports, disability employment services, short-term accommodation, supported independent living and Accord Plus (after-hours programs). In FY2024-25, Accord supported 817 clients across 54 sites.

Healthcare at Home

This service provides compassionate and timely health care from 10 service delivery centres to individuals in their own homes following hospital stays, allowing them to continue receiving expert assistance while benefiting from familiar surroundings. In FY2024-25, the service delivered care to more than 67,523 patients across their care journey. Services include after-hospital clinical care, postnatal home assistance, and rehabilitation provided by therapists.

St John of God Foundation

St John of God Health Care's fundraising and philanthropic arm, the St John of God Foundation, supports advancements in medical technology and research conducted at our hospitals. From the personal impact of tailored treatment to the far-reaching effects of leading medical research, the Foundation helps transform both individual patient experiences and community health outcomes across Australia.

Supply Chains

Our supply chains span medical devices and consumables, pharmaceuticals, ICT equipment, facilities management, labour services, food services, textiles and major capital works.

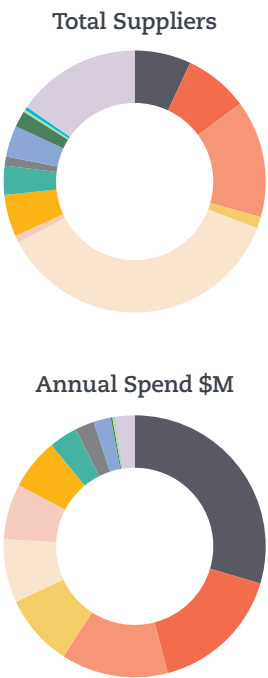
During 2025, our supply chain comprised 3,747 total suppliers across 40 supply categories, with total spend of approximately \$1.039 billion concentrated in medical devices and supplies (\$307.3M), healthcare services (\$169.8M), facility management (\$137.0M), building and construction (\$92.8M), professional services (\$81.1M), drugs and pharmaceuticals (\$71.3M), ICT hardware, software and services (\$65.7M), labour hire (\$36.7M), utilities (\$24.3M), food and catering services (\$22.3M), cleaning and security services (\$2.0M), transport, logistics and warehousing (\$2.5M), uniforms and PPE (\$0.5M), and other categories (\$25.4M).

A significant proportion of medical devices and consumables are sourced from manufacturers based in the United States, Europe and Asia. Many of these products involve complex global supply chains, including raw material sourcing and manufacturing processes in countries with elevated modern slavery risk indicators.

Supply Chain by ACAN Taxonomy Category (2025)

Category	Suppliers	Spend
Medical devices and supplies	261	\$307.3M
Healthcare services and distribution	297	\$169.8M
Facility management and property maintenance	543	\$137.0M
Building and construction	53	\$92.8M
Professional services	1,369	\$81.1M
Drugs and pharmaceuticals	32	\$71.3M
ICT hardware, software and services	194	\$65.7M
Labour hire	134	\$36.7M
Utilities	42	\$24.3M
Food and catering services	145	\$22.3M
Cleaning and security services	75	\$2.0M
Transport, logistics and warehousing	11	\$2.5M
Uniforms and PPE	15	\$0.5M
Other categories	576	\$25.4M

Table 1 Supply chain taxonomy 2025



Historical Procurement Trends (2020–2025)

Year	Active Contracts	Modern Slavery Term	Spend (\$M)	Suppliers	Percentage in Australia	Total 80% Spend
2020	153	—	\$760M	4,800	98%	179
2021	201	55	\$808M	4,300	98%	175
2022	284	65	\$1,089M	4,266	97%	175
2023	376	91	\$949M	4,093	95%	190
2024	476	298	\$987M	3,918	95%	180
2025	500+	348	\$1,039M	3,747	95%	~185

Table 2 St John of God Health Care procurement trends 2020 to 2025.

Supplier Expectations and Compliance

St John of God Health Care requires its suppliers and vendors to implement robust policies and processes that prevent modern slavery, uphold human rights and ensure ethical sourcing across all levels of the supply chain. Our Code of Conduct extends expectations to all third-party partners, reinforcing our zero-tolerance approach to modern slavery and unethical practices.

Due diligence measures include strengthened contractual requirements, mandatory supplier declarations and ongoing monitoring to identify and address potential risks.

Key Sourcing Categories

St John of God Health Care procures a diverse range of products and services. The key procurement categories include:

- **Medical and Clinical Supplies**
Pharmaceuticals, medical consumables (syringes, gloves, PPE, wound care), surgical instruments, diagnostic and imaging equipment, patient monitoring systems.
- **Health Care Technology and Digital Solutions**
Medical software, clinical decision support, telehealth platforms, cybersecurity solutions, network and infrastructure services.
- **Hospital and Facility Management**
Medical waste management, cleaning and hygiene products, hospital catering and nutrition, laundry and linen services, utilities.
- **Capital Equipment and Infrastructure**
Hospital beds and patient furniture, building construction and maintenance, facility upgrades, medical transport and logistics.
- **Corporate and Professional Services**
Legal and compliance, human resources and labour hire, financial services, marketing, education and training providers.
- **Social and Community Services Procurement**
Community mental health services, disability support equipment, emergency response and outreach, housing and accommodation for vulnerable populations.





Modern Slavery Risks

Mandatory Criteria 3 — Describe the risks of modern slavery practices

Modern slavery risks may arise in both our operations and supply chains. In assessing these risks, we consider factors including geographic origin of goods, industry and sector risk indicators, workforce composition, use of subcontracting, and the vulnerability of workers within supply chain tiers.

We apply a tiered risk assessment methodology informed by ACAN guidance, sector collaboration, the Global Slavery Index, Sedex supplier self-assessment questionnaires (SAQs), and category-level risk profiling. This methodology allows us to prioritise engagement with suppliers in higher-risk categories.

In 2025, 77.6% of total supply chain spend was classified as high-risk on a category-based risk classification approach at procurement category level, with 52.6% of suppliers (by count) in high-risk categories. This concentration reflects the nature of healthcare procurement, where medical devices and facility services dominate expenditure and often involve complex, multi-tier global supply chains.

Risk Assessment Methodology

Our risk assessment approach operates across three tiers of progressively deeper scrutiny:

- **Tier 1**
Category-level risk classification: All 3,747 suppliers are classified using the ACAN taxonomy, which assigns inherent risk ratings based on industry, geography and product type. This provides a baseline risk view across the entire supply chain.
- **Tier 2**
Supplier self-assessment (ACAN Survey & Sedex SAQ): Suppliers in medium- and high-risk categories are invited to complete detailed self-assessment questionnaires covering labour practices, subcontracting arrangements, worker welfare and management systems. 929 cumulative ACAN surveys and 142 Sedex SAQs have been completed.
- **Tier 3**
Social audits and site-level verification: For suppliers identified as highest-risk through self-assessment, social audits (including SMETA and equivalent standards) are reviewed through the Sedex platform. 11 social audits were visible in 2025 with 66 audit findings identified.

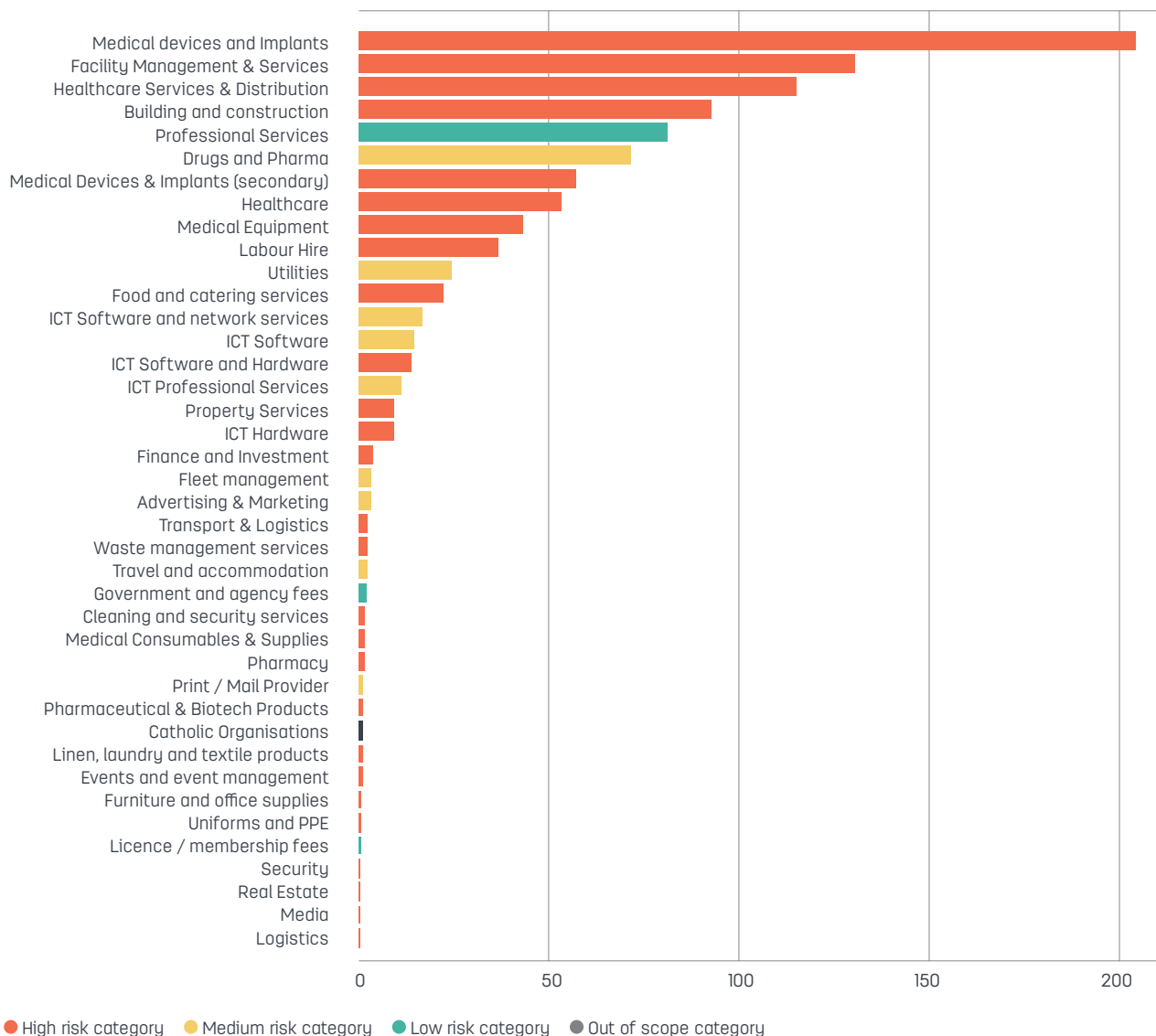
Industry Sector Risk

Certain industries have an inherently higher risk of modern slavery due to labour-intensive production, weak labour regulations and reliance on low-skilled or vulnerable workers. High-risk sectors relevant to St John of God Health Care include:

- Healthcare and medical supply chains (e.g., gloves, PPE, pharmaceuticals)
- Construction and building materials
- Cleaning and facility management services
- Textiles and uniforms
- Electronics and IT hardware
- Food and catering services

The total spend (~\$1.039 billion) and supplier risk across 3,747 suppliers was assessed in 2025 using the ACAN taxonomy across 40 supply categories. The graph below shows the outcome of the 2025 risk classification.

Modern Slavery Risk by Spend Category (40-Category Breakdown)



Commodity/Product Risk

Some products and raw materials are more susceptible to modern slavery due to sourcing practices and labour exploitation. High-risk products include:

- Medical gloves and PPE (sourced from high-risk labour regions)
- Surgical instruments and medical devices (metals and components from high-risk regions)
- Uniforms and textiles (cotton from countries with forced labour issues)
- Electronics and IT (computers, servers, smartphones — linked to forced labour in mining for raw materials)
- Rubber, palm oil, seafood and cocoa (commonly associated with forced or child labour)

Geographic Location Risk

The country of origin of a supplier or product is a major determinant of modern slavery risk. Key risk factors include weak labour laws and enforcement, prevalence of forced labour and child labour, and lack of corporate transparency. High-risk regions include:

- Asia-Pacific (e.g., China, Malaysia, Bangladesh, India, Thailand, Myanmar)
- Middle East and Africa (e.g., UAE, Qatar, Democratic Republic of the Congo)
- Latin America (e.g., Brazil, Mexico, Peru)

Workforce Profile Risk

St John of God Health Care recognises social, economic and cultural aspects that could increase a worker's vulnerability, including but not exclusive to:

- Dangerous and hazardous work, isolation (work completed out of standard office hours with little or no supervision)
- Sham contracting, undeclared contracting and subcontracting arrangements (lack of clarity on layers between principal employer and workers)
- Insecure work (high levels of casual and zero-hours contracts with low coverage of sick leave)
- Workers with English as a second language (low awareness of entitlements and rights, including students on visas and migrant workers)
- Labour-intensive work (quotas and work demand often too high for the allocation of time and number of people)

Recruitment and Labour Hire Risk

Modern slavery risks increase when recruitment practices are opaque or exploitative. Key risk factors include:

- Charging of recruitment fees (leading to debt bondage)
- Unclear contracts and lack of employment documentation
- Retention of passports or work permits by employers
- Restrictions on worker movement or freedom

Supply Chain Complexity Risk

Modern slavery risks increase with greater supply chain complexity and lack of transparency. Key risk indicators include:

- Use of multiple subcontractors (higher risk of illegal subcontracting)
- Lack of traceability in supplier tiers (beyond Tier 1 suppliers)
- Limited supplier due diligence and reporting mechanisms

Supplier Due Diligence and Compliance Risk

The effectiveness of supplier governance and compliance directly affects modern slavery risks. Key risk indicators include:

- No supplier code of conduct addressing modern slavery
- No independent social audits or third-party certifications
- Failure to remediate identified labour rights issues
- Lack of worker grievance mechanisms

Operational Risk Factors

We recognise that modern slavery risks are not limited to supply chains. The following operational risk factors are considered in our assessment:

- **Labour hire and agency workers**
Use of third-party labour providers, particularly in cleaning, catering, security and maintenance, creates risks of exploitation including underpayment, excessive working hours and restrictions on freedom of movement.

- **Migrant and temporary visa workers**

Workers on temporary visas may face heightened vulnerability due to language barriers, limited awareness of workplace rights and dependency on employer-sponsored arrangements.

- **Subcontracting chains**

Multi-tier subcontracting in construction, maintenance and facility management can obscure visibility of labour conditions at lower tiers.

- **Geographic origin of goods**

A significant proportion of medical devices, ICT equipment, textiles and PPE are manufactured in countries with elevated modern slavery risk indicators, including parts of Asia and the Pacific region.

- **Seasonal and casual labour**

Casual and seasonal workforce arrangements in catering and hospitality services may involve workers in precarious employment situations.

Sedex Risk Breakdown

Of the 142 suppliers with completed SAQs on the Sedex platform, the risk distribution is as follows:

- **High risk: 40 suppliers (28.17%)**

These suppliers are prioritised for enhanced due diligence, corrective action follow-up and social audit review.

- **Medium risk: 44 suppliers (30.98%)**

These suppliers are monitored through periodic review and targeted engagement.

- **Low risk: 58 suppliers (40.85%)**

These suppliers have demonstrated satisfactory labour practices and management systems.

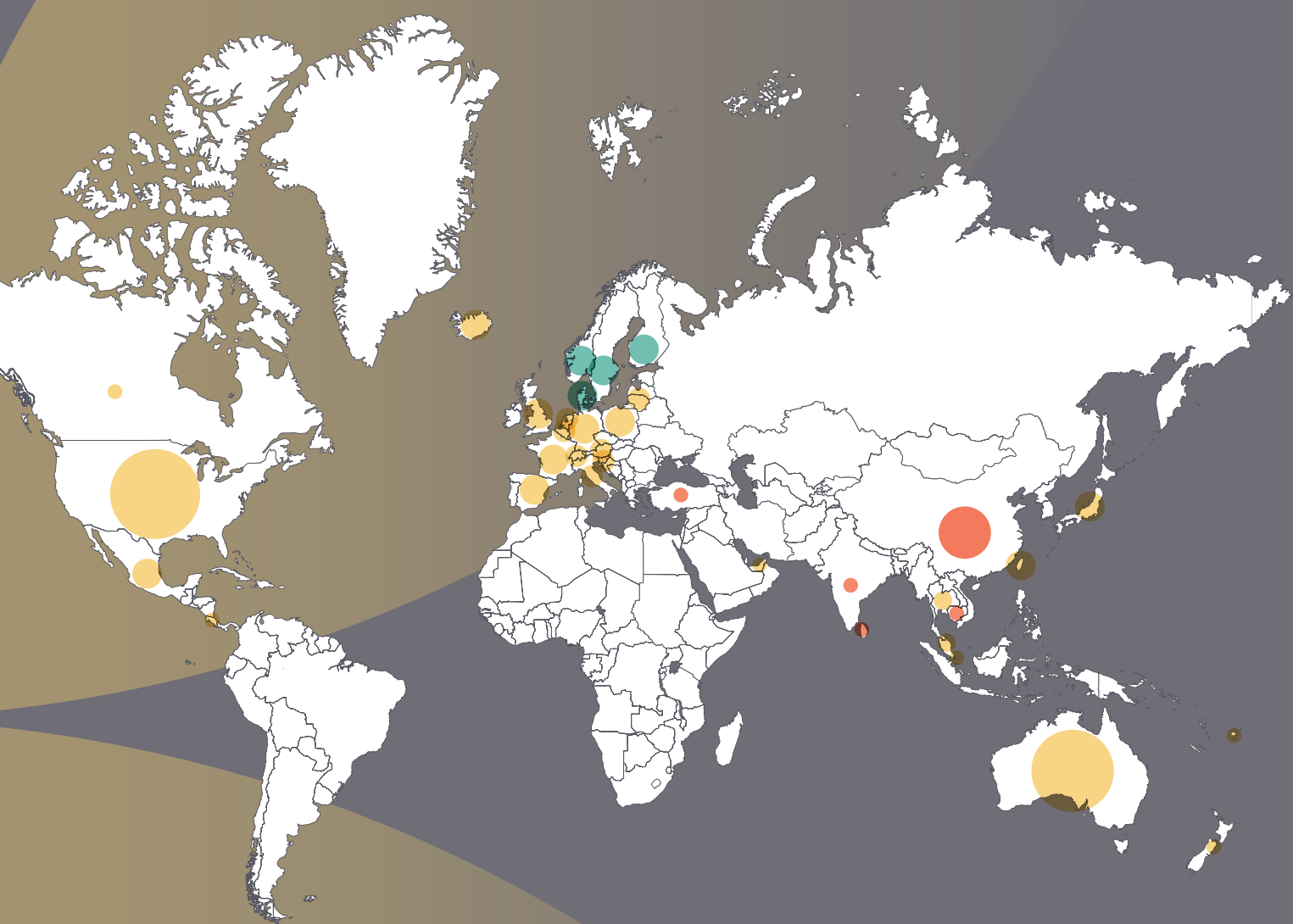
Donations to St John of God Foundation

St John of God Health Care receives donations from members of the community and undertakes fundraising through St John of God Foundation.

A documented procedure outlines governance for the acceptance, recording and acknowledgement of gifts. In addition, the procedure outlines responsibilities if unethical or socially irresponsible behaviour is suspected, and specifically references modern slavery as an example of unacceptable behaviour.

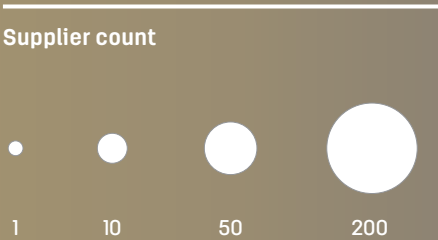
We undertake due diligence on all gifts valued at \$10,000 or more.





Global Supply Chain Risk Map

Tier 1 Supplier Sourcing Countries —
2025 ACAN Entity Report



35

Sourcing
Countries

585

Tier 1
Suppliers

5

High-Risk
Countries

4

Low-Risk
Countries

Risk category



High Risk (5 countries)

China	40
Sri Lanka	3
Cambodia	1
India	1
Turkey	1



Medium Risk (26 countries)

Australia	213
United States	118
Germany	53
United Kingdom	20
Italy	16
France	13
Taiwan	13
New Zealand	10
Switzerland	10
Austria	8
Japan	8
Spain	7
Malaysia	4
Mexico	4
Fiji	3
Lithuania	3
Thailand	3
Belgium	1
Canada	1
Costa Rica	1
Iceland	1
Netherlands	1
Poland	1
Singapore	1
Slovakia	1
United Arab Emirates	1



Low Risk (4 countries)

Denmark	17
Sweden	4
Finland	2
Norway	1





Actions Taken during 2025

Mandatory Criteria 4 — Describe the actions taken to assess and address risks

Our actions during 2025 are organised against the six pillars of our modern slavery approach. These actions address both supply chain risks and operational risks and reflect our commitment to moving beyond compliance toward demonstrable impact.

Six Strategic Pillars

Pillar 1

Governance & Accountability



Pillar 2

Risk Assessment & Supply Chain Visibility



Pillar 3

Supplier Engagement & Due Diligence



Pillar 4

Remediation & Worker Protection



Pillar 5

Capability, Training & Ethical Culture



Pillar 6

Reporting, Transparency & Improvement



Modern Slavery Working Group

St John of God Health Care maintains a dedicated Modern Slavery Working Group, comprising 11 representatives from key functional areas, including procurement and supply chain, workforce, legal, international health, corporate affairs, compliance, policy, and risk. This cross-functional collaboration ensures a comprehensive and integrated approach to addressing modern slavery risks across our operations and supply chains.

The group initially convened bimonthly to establish governance structures and drive early-stage initiatives. As the program has matured, the meeting frequency has transitioned to a quarterly schedule to maintain momentum while allowing flexibility. The Working Group reports to the Audit & Risk Committee.

Pillar 1 — Governance & Accountability

Governance of modern slavery risk is overseen by the Board Audit & Risk Committee (ARC), with operational coordination through the Modern Slavery Working Group and alignment to the ESG Council.

- Ongoing oversight by the Modern Slavery Working Group and Board Audit & Risk Committee.
- Integration of modern slavery reporting within ESG governance structures.
- Finalisation of the Modern Slavery and Ethical Supply Chain Framework & Roadmap 2026–2030, which will be tabled for Board endorsement in May 2026.

- Establishment of clear accountability lines across procurement, risk and compliance, people and culture, and executive leadership.
- Maintained standardised, regular reporting to the ARC, providing detailed insights into expenditure, risk assessments and contract management by supplier and category.
- Monitored grievance and whistleblowing platforms, ensuring concerns raised by internal or external parties were addressed promptly.

Pillar 2 — Risk Assessment & Supply Chain Visibility

- 929 cumulative ACAN Supplier Surveys completed (377 completed in 2025).
- 170 suppliers identified for Sedex onboarding (up from 159 invited in 2024).
- 142 suppliers on Sedex with SAQs completed (40 High, 58 Low, 44 Medium risk).
- 11 social audits visible through Sedex (66 audit findings identified).
- Continued refinement of category-level risk classification using the ACAN taxonomy across 14 supply chain categories.
- Reclassified assessment taxonomy to align with ACAN recommendations, now covering 40 spend categories for better risk assessment and monitoring.

Pillar 3 — Supplier Engagement & Due Diligence

Supplier engagement operates through a tiered model, with intensity of engagement calibrated to risk level:

- 66 corrective actions identified through audit findings (down from 81 in 2024, reflecting targeted focus on higher-risk suppliers).
- 22 supplier staff completed ACAN modern slavery e-learning.
- 2,657 supplier emails sent as part of engagement communications.
- 8,468 supplier communications issued across the reporting period.
- Modern slavery clauses continue to be integrated into new and renewed supplier contracts. As at 2025, 348 contracts included modern slavery clauses across 500+ active contracts. Work is underway to expand coverage to all applicable contracts through renewal cycles.
- St John of God Health Care's Supplier Code of Conduct sets expectations for labour standards, subcontracting transparency and worker welfare across our supply base.
- Extended ethical sourcing guidelines to suppliers under blanket purchase order agreements, encompassing significant non-payroll expenditure.

Case Study

Supplier Risk Reviews

In 2025, joint Supplier Risk Reviews were undertaken to enhance supplier engagement and management of modern slavery risk. The model introduced a clear review layer between supplier self-assessment and action planning to make supplier responses robust, risk-based, and outcome-driven on enhancing worker protection.

The Supplier Risk Reviews identified:

- Inconsistent reporting on the use of indirect labour — with undertakings to clarify labour hire practices and put in place appropriate protections for workers.
- Determination of high-risk product and service categories — with suppliers being requested to outline risk reduction measures and make inclusion of workers' rights contractual.
- Gaps in governance and public disclosures — with suppliers being requested to update documentation to include current anti-modern-slavery requirements.
- While grievance mechanisms were in place, their effectiveness was in doubt, leading to calls for improved metrics and access.
- Inconsistencies in remediation procedures were addressed through dialogue, leading to commitments to develop or update frameworks.
- Key Metrics: 21 Supplier Risk Reviews scoped, 7 completed, 5 supplier meetings completed, 20 additional historical assessments shared with the Hospitals Working Group.

21

Supplier Risk Reviews scoped

7

completed

5

supplier meetings completed

20

additional historical assessments shared with the Hospitals Working Group

Partnerships and Collaboration

St John of God Health Care continued to actively engage with external partners and sector bodies to strengthen our modern slavery response:

- **Australian Catholic Anti-Slavery Network (ACAN)**

St John of God Health Care is a member of ACAN and utilises ACAN's ROTA platform for supplier risk assessment, the Sedex platform for supplier due diligence, and ACAN's annual maturity assessment framework.

- **Catholic Health Australia (CHA)**

St John of God Health Care participates in CHA's modern slavery working group, contributing to sector-wide guidance and shared learning.

- **Catholic Negotiating Alliance (CNA) / CNA JPN**

Engagement enables cross-sector collaboration with Catholic education, social services and aged care organisations.

- **Australian Catholic Religious Against Trafficking in Humans (ACRATH)**

Ongoing partnership to enhance awareness on modern slavery.

- **Catholic Mission**

Expanded partnerships on key initiatives.

- **International Day for the Abolition of Slavery**

Public commitment and awareness campaigns conducted during the reporting period.

Contract Management

We executed new contracts and variations to existing contracts, including anti-slavery clauses for 348 of our suppliers across 500+ active contracts. We continue to

include anti-slavery provisions in new contracts through sourcing events and contract variations. We continued to review our templates to ensure compliance with modern slavery provisions.

Code of Conduct

In 2025, St John of God Health Care maintained its enhanced Code of Conduct, reinforcing the expectation that caregivers, suppliers and stakeholders uphold the highest standards of integrity, ethical behaviour and compliance with modern slavery prevention measures.

The Code of Conduct is reviewed regularly and is available on both internal and external platforms, ensuring transparency and accessibility. It outlines the minimum standards and behaviours required of all caregivers, promoting fairness, respect and ethical decision making while aligning with our Mission, Vision and Values.

St John of God Health Care maintains a zero-tolerance approach to all forms of exploitation, abuse and unethical labour practices. This principle is embedded across our operations and forms a cornerstone of our ethical commitment.

Modern Slavery Policy

As part of St John of God Health Care's commitment to combating modern slavery, an annual review of the Modern Slavery Policy was completed. This review ensures that the policy remains aligned with evolving regulatory requirements, industry best practices and organisational priorities. The Modern Slavery Policy consists of a comprehensive framework that includes:

- **Policy**

Outlining St John of God Health Care's commitment to eradicating modern slavery, ethical sourcing expectations, and compliance with relevant laws and regulations.

- **Procedures**

Providing clear guidance on risk assessment, due diligence and reporting mechanisms.

Pillar 4 — Remediation & Worker Protection

Remediation and worker protection are central to our modern slavery response. During 2025, we progressed the development of formal remediation protocols aligned with the UNGPs and the 2026–2030 Framework.

- No substantiated modern slavery incidents were identified during 2025.
- Development of a victim-centred remediation protocol aligned with the 2026–2030 Framework, to be formalised during 2026.
- St John of God Health Care's existing whistleblower framework (under the Whistleblower Policy) provides confidential channels for reporting suspected modern slavery or labour exploitation, available to caregivers, contractors and suppliers.
- Grievance mechanisms for workers in contracted supply chains will be strengthened under the Framework through integration with the Domus 8.7 incident management system, planned for implementation during 2026–2027.

Pillar 5 — Capability, Training & Ethical Culture

Training and capability building supports early identification and escalation of modern slavery risks across the organisation.

- 93 caregivers completed modern slavery training in 2025, maintaining the training rate achieved in 2024.
- 22 supplier staff completed ACAN modern slavery e-learning (down from 120 in 2024 — noting the 2024 figure included a one-off onboarding cohort).
- Five Modern Slavery eLearning modules are available for caregivers on the Learning and Development platform.
- For new members joining the Modern Slavery Working Group, essential training modules including Modern Slavery 101, Business Readiness, and Grievance Mechanisms and Remedy were completed.
- Training content covers indicators of modern slavery and forced labour, reporting obligations under the Act, St John of God Health Care escalation pathways, and supply chain due diligence expectations.
- Modern slavery awareness is planned for integration into caregiver onboarding and procurement role-specific training under the 2026–2030 Framework.

Vendor Onboarding

As part of our transition to a new Enterprise Resource Planning (ERP) system, we revisited and refined our vendor onboarding process to strengthen compliance, risk management and transparency in supplier engagement.

The onboarding process now links to the St John of God Health Care Supplier Code of Conduct and our standard terms and conditions, reinforcing our commitment to ethical sourcing. Modern slavery commitments form an integral part of the supplier onboarding process, ensuring all new suppliers acknowledge and comply with our modern slavery commitments as a required condition of onboarding.

Pillar 6 — Reporting, Transparency & Improvement

- Strengthened data ownership and reporting clarity in preparation for independent assessment.
- ACAN will conduct an independent assessment of our modern slavery maturity following the completion of the 2025 reporting cycle.
- Continued alignment of modern slavery reporting with ESG disclosure requirements, including GRI 408 (Child Labour) and GRI 409 (Forced or Compulsory Labour).
- Enhanced data collection processes to support outcome-based indicators alongside input metrics in future reporting periods.







Effectiveness Assessment

Mandatory Criteria 5 — Describe how the entity assesses the effectiveness of actions

At St John of God Health Care, we continuously strengthen our governance, risk management and due diligence processes to mitigate modern slavery risks.

Our Board Audit and Risk Committee (ARC) plays a key role in reviewing identified risks, ensuring compliance and overseeing mitigation measures across our operations and supply chain.

We measure the effectiveness of our actions through a combination of governance oversight, supplier coverage metrics, contractual compliance, training completion rates and remediation pathway development.

The table below provides a year-on-year comparison of key performance indicators:

Year-on-Year Analysis

Several metrics demonstrate continued progress in 2025. The cumulative ACAN Supplier Survey count increased from 552 to 929, reflecting sustained engagement across the supply base. Sedex onboarding continued to grow, with 142 suppliers now maintaining completed SAQs (up from 122 in 2024).

Some metrics showed decreases compared to 2024. Social audits visible through Sedex declined from 18 to 11, reflecting the audit cycle timing and the focus on suppliers undergoing re-assessment. Supplier e-learning completions fell from 120 to 22; the 2024 figure included a one-off onboarding cohort for newly enrolled suppliers.

The reduction in total supplier count from 3,918 to 3,747 reflects data cleansing and consolidation of the supplier register, not a reduction in supply chain activity.

Year-on-Year Performance Comparison

Metric	2023	2024	2025
Total suppliers assessed	~3,500	3,918	3,747
ACAN Supplier Surveys completed (cumulative)	~400	552	929
Surveys completed in reporting year	—	638	377
Suppliers identified for Sedex	~100	159 invited	170
Suppliers on Sedex (SAQ completed)	~80	122	142
Social audits visible	12	18	11
Audit findings / corrective actions	~50	81	66
Supplier e-learning completed	—	120	22
Caregiver training	—	93	93
Modern slavery contracts integrated	200+	298	348

Maturity Scorecard — Sedex SAQ (2025)

The Sedex Self-Assessment Questionnaire (SAQ) is a recognised ethical trade assessment tool that evaluates an organisation's policies, processes, and practices relating to labour standards, human rights, governance, and business ethics. Each thematic area is scored based on the level of policy maturity, implementation, and supporting evidence, with points awarded against defined criteria aligned to international standards such as the ILO conventions and the UN Guiding Principles on Business and Human Rights. The total points achieved are expressed as a percentage and translated into maturity ratings (e.g., Good or Advanced), enabling

organisations to benchmark performance and identify areas for improvement over time.

St John of God Health Care has maintained an overall maturity rating of 50% (Established), with positive movement in Worker Engagement (+3.76%) and Operations (+2%), offset by decreases in Supply Chain (-7.74%) and Entity Program & Activities (-8%). Risk assessment ratings remained largely maintained across pillars.

Overall maintained our maturity at ~50% as a Sustained Practice with maturity ambition of a Maturing practice over the next 5 years to reach a target maturity of 65%.

Sedex SAQ Maturity Assessment (2025)

Pillar	A	B	C	D	2025	Risk Assessment (SEDEX)
1 Business Process & Governance						Maintained
2 Operations						2%
3 Supply Chain						Maintained
4 Worker Engagement						Maintained
5 Entity Program & Activities						Additional Measures (-8%)
6 Grievance & Remediation						Maintained
Maturity Overall Improvement	0.78%	-2.76%	-7.74%	3.76%	-1.92%	-1.58%

Established Partial Emerging — moon-phase indicators of maturity per pillar.

Remediation & Grievance Mechanisms

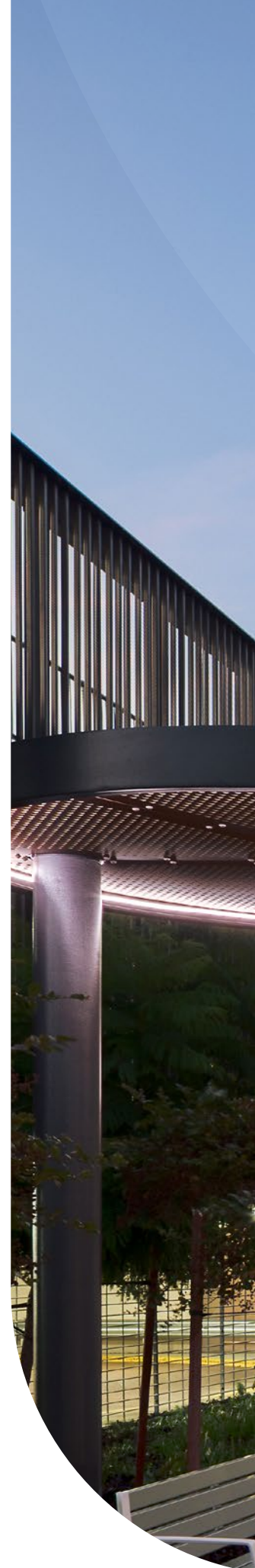
St John of God Health Care provides several avenues for individuals to raise grievances or provide feedback, both internally and externally focused. These include existing internal complaint and feedback channels, whistleblower protections, and established referral pathways through ACAN and partner organisations such as ACRATH. St John of God Health Care is committed to ensuring these mechanisms are accessible, safe and responsive to the needs of affected individuals.

- Existing grievance and feedback channels are available to caregivers, contractors and external stakeholders to raise concerns related to modern slavery or unethical practices.
- Referral pathways to specialist support services, including ACRATH, are maintained to provide guidance and assistance where modern slavery concerns are identified.
- St John of God Health Care is reviewing additional remediation mechanisms, including Domus 8.7 — a modern slavery remediation service available through the ACAN Program — to determine its suitability for integration into St John of God Health Care's remediation framework in future reporting periods.

Forward Indicators

To strengthen effectiveness measurement in future periods, we are developing the following forward indicators as part of the 2026–2030 Framework:

- **Corrective action closure rate**
Measuring the proportion of audit findings remediated within agreed timeframes.
- **Supplier risk rating improvement**
Tracking movement of suppliers from higher to lower risk categories following engagement.
- **Worker-voice indicators**
Exploring worker feedback mechanisms, including Domus 8.7, as part of St John of God Health Care's review of additional remediation and engagement tools for future reporting periods.
- **Independent assurance**
External verification of risk assessment and remediation processes in collaboration with ACAN, targeted for 2029.





St John of God Subiaco Hospital



Consultation

Mandatory Criteria 6 — Describe the process of consultation with owned or controlled entities

St John of God Health Care undertook consultation with each of its owned and controlled entities during 2025 to inform the preparation of this joint statement. The consultation process was designed to ensure that the modern slavery risks, actions and outcomes relevant to each entity were appropriately captured.

Consultation with Controlled Entities

St John of God Health Care consulted with each of its owned and controlled entities through existing governance and management channels. The consultation process confirmed each entity's modern slavery risk exposure, reviewed relevant supply chain and workforce arrangements, and informed the content of this joint statement.

The following controlled entities were consulted as part of this reporting period:

- St John of God Outreach Services
- St John of God Foundation Inc
- St John of God Midland Health Campus Ltd
- Dencross Pty Ltd
- St John of God Berwick Health Campus Ltd
- St John of God Marillac

Internal Cross-Functional Consultation

Internal consultation was conducted across key business functions to inform the content of this statement and the development of the 2026–2030 Framework:

- **Procurement & Supply Chain**
Led supplier risk assessment, category analysis and supplier engagement activities.
- **Risk & Compliance**
Contributed to risk methodology, regulatory alignment and governance reporting.
- **People & Culture**
Provided workforce data, training metrics and labour hire oversight.
- **Legal**
Reviewed contractual integration of modern slavery clauses.

- **Executive Leadership Team**
Endorsed the Framework and provided strategic direction on resourcing and priorities.
- **Members of the Modern Slavery Working Group**
Coordinated cross-functional input and reported progress to the Audit & Risk Committee.

External Consultation

St John of God Health Care continues to actively engage with external partners and sector bodies to strengthen our modern slavery response:

- **Australian Catholic Anti-Slavery Network (ACAN)**
St John of God Health Care is a member of ACAN and utilises ACAN's ROTA platform for supplier risk assessment, the Sedex platform for supplier due diligence, and ACAN's annual maturity assessment framework.



ACAN provides sector intelligence, compliance support and access to the Domus 8.7 grievance management system.

- **Catholic Health Australia (CHA)**
St John of God Health Care participates in CHA's modern slavery working group, contributing to sector-wide guidance and shared learning on supply chain due diligence practices.
- **Catholic Negotiating Alliance (CNA)**
Engagement through CNA enables cross-sector collaboration with Catholic education, social services and aged care organisations on modern slavery prevention.
- **Anti-Slavery Commissioner**
St John of God Health Care monitors guidance and publications from the Australian Anti-Slavery Commissioner to inform our approach and ensure alignment with regulatory expectations.

Framework & Roadmap Endorsement Process

In addition to consulting on the annual statement, St John of God Health Care undertook specific consultation with its Executive Leadership Team and Board regarding the Modern Slavery and Ethical Supply Chain Framework & Roadmap 2026–2030. This included:

- Presentation of the Framework to the Executive Leadership Team in February 2026, including endorsement of the Framework & Roadmap.
- Preparation of an Assurance Memorandum for the Audit & Risk Committee, providing detailed analysis of programme maturity, KPI performance, and the strategic rationale for the Framework & Roadmap.



Other Relevant Information

Mandatory Criteria 7 — Any other relevant information

In addition to the actions described above, St John of God Health Care undertook the following initiatives during 2025 to support our modern slavery prevention efforts:

Public Commitment and Awareness

St John of God Health Care publicly recognised the International Day for the Abolition of Slavery (2 December), conducting internal awareness campaigns across all facilities to reinforce our commitment to combating modern slavery.

Stakeholder Engagement

- Participated in stakeholder engagement events with Catholic sector peers.
- Engaged with survivor advocates to inform our understanding of victim-centred approaches to remediation.
- Contributed to the ACAN Compendium, sharing our experiences and approaches with other Catholic health care entities.

Advocacy for Policy Change

St John of God Health Care supports the strengthening of Australia's legislative framework to address modern slavery and welcomes ongoing reform efforts to enhance transparency, accountability, and enforcement.

Framework Enablement

The Framework is enabled by St John of God Health Care's continued membership of ACAN, which provides specialist systems (ROTA, Sedex, Domus 8.7), sector intelligence, and compliance support — enabling access to specialist capability, systems, and sector intelligence through ACAN membership, complementing internal governance structures.

Statutory Reform Readiness

St John of God Health Care is monitoring the Australian Government's response to the statutory review of the Modern Slavery Act 2018, including potential amendments relating to:

- Establishment of an Anti-Slavery Commissioner with investigative and enforcement powers.
- Introduction of penalties for non-compliance, including civil penalties for failure to report or provision of misleading information.
- Mandatory due diligence requirements that may extend obligations beyond reporting to proactive risk identification and remediation.

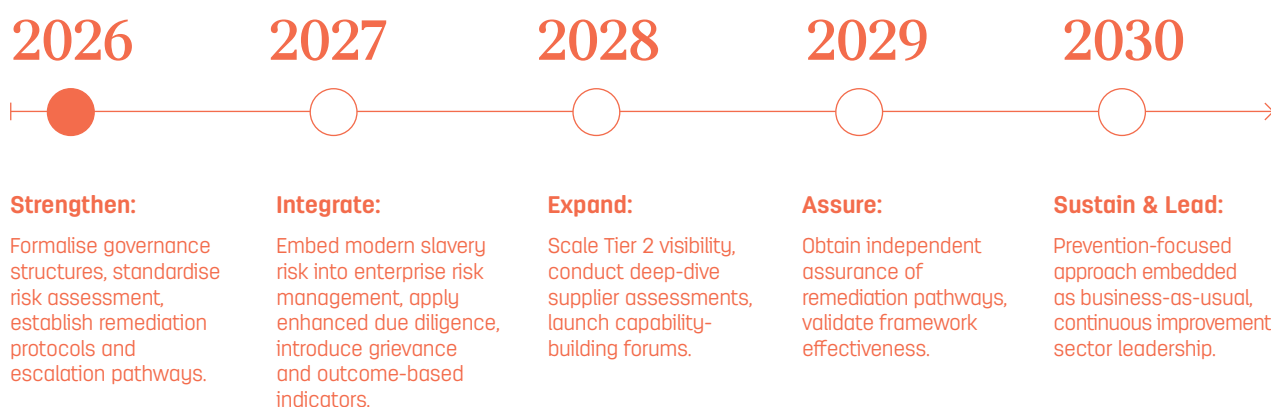


Future Commitments — 2026–2030 Roadmap

In February 2026, St John of God Health Care finalised its Modern Slavery and Ethical Supply Chain Framework & Roadmap 2026–2030.

The Framework prioritises foundational governance, Tier 1 risk assessment, core training, and compliant reporting — ensuring statutory compliance and progressive maturity improvement, targeting 65% maturity by 2030.

The Framework will be tabled for Board endorsement in May 2026 and establishes the following phased approach:





ST VINCENT'S
Better and fairer care. Always.
UNDER THE STEWARDSHIP OF MARY AIKENHEAD MINISTRIES

Modern Slavery Statement

1 January – 31 December 2025

Disclosure

This is a joint statement made on behalf of St Vincent's and covers the following entities it owns or controls:

St Vincent's Health Australia Ltd
ABN 75 073 503 536

on its own behalf and on behalf of the following subsidiary or affiliated entities:

St Vincent's Hospital Sydney Limited
ABN 77 054 038 872

St Vincent's Hospital (Melbourne) Limited ABN 22 052 110 755

St Vincent's Private Hospitals Ltd
ABN 61 083 645 505

St Vincent's Private Hospital Sydney*
ABN 99 269 630 262

St Vincent's Care Services Ltd
ABN 50 055 210 378

St Vincent's Healthcare Ltd
ABN 46 095 382 791

St Vincent's Community Health Ltd
ABN 36 054 594 375

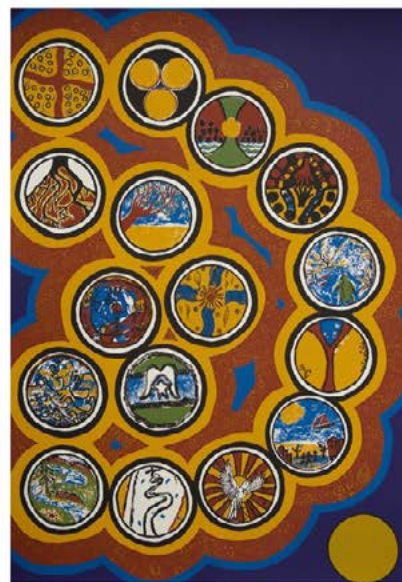
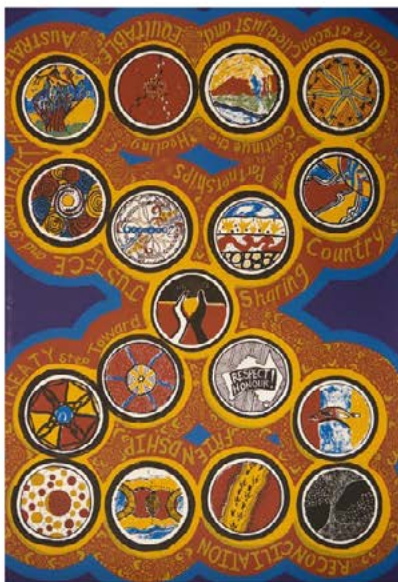
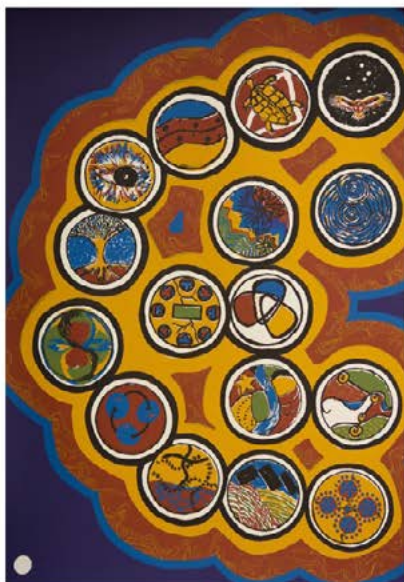
**affiliated entity*

Contact for Modern Slavery

SVHA Modern Slavery
Liaison Officer
antimodernslavery@svha.org.au

Level 22, 100 William St
Woolloomooloo NSW 2010

svha.org.au



Reconciliation: Towards excellent health, happiness and equality, 2016 Bianca Beetsun, Vicki Couzens and Jeffery Samuels in collaboration with 48 SVHA staff members



St Vincent's recognises the Traditional Custodians of the land on which its many sites are located. We pay our respects to Elders past and present and welcome all Aboriginal and/or Torres Strait Islander people to our places of care.

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Better and
fairer care.
Always.





A message from our Chair

Mr Paul O'Sullivan

As we present our sixth Modern Slavery Statement, I am pleased to reflect on the meaningful progress St Vincent's has made in deepening our commitment to combatting modern slavery - not as a compliance obligation, but as an expression of our Mission to serve those most in need.

This year has been defined by a shift from awareness to action and from broad frameworks to targeted, healthcare-specific responses. Central to this evolution is how we have listened to our people. Feedback from staff made it clear that our earlier training lacked the real-world relevance that our healthcare context demands. In response, we co-designed a new suite of role-specific learning modules tailored for clinical staff, hiring managers, and labour hire agencies, co-developed in genuine partnership with survivors of modern slavery and subject matter experts such as ACRATH, the Office of the Anti-Slavery Commissioner, NSW and the University of Notre Dame. These programs draw on lived experience and clinical expertise to equip our people with the practical knowledge to recognise risk as it presents in our unique environment.

This recognition is critical at the bedside. Our Commonwealth-funded screening pilot identified survivors of modern slavery in our public hospitals, with nearly a third having previously been misidentified in other health settings, and a further third going entirely unrecognised despite repeated contact with health services. These findings are sobering and galvanising. We are scaling our frontline screening program, expanding our clinical advocacy network, and embedding modern slavery identification within our existing family and domestic violence frameworks, thereby strengthening referral pathways to specialist support services.

In our supply chain, we have moved beyond platform-based assessments toward direct bilateral engagement with our highest-risk suppliers together with ACAN and our Supplier Due Diligence Program, we are building shared intelligence for meaningful due diligence and actively listening to the challenges our suppliers face, creating a safe, collaborative space to support them where needed.

Our ongoing partnerships with ACRATH, the Office of the Anti-Slavery Commissioner NSW, and the Australian Federal Police are foundational to this work. These collaborations connect us to leading expertise, lived experiences, and cross-sector knowledge that no organisation can develop alone.

There is more to do. We remain candid about the challenges that persist and are committed to the continuous improvement this work demands. Our Mission calls us to see every person and act accordingly.

Mr Paul O'Sullivan
Board Chair

This Modern Slavery Statement was approved by the principal governing body of St Vincent's as defined by the Modern Slavery Act 2018 (Cth) ("the Act") and was approved on 19 June 2026.

This Modern Slavery Statement is signed by a responsible member of St Vincent's Health Australia Ltd as defined by the Act.



A message from Group Procurement

Renee Hodge

As General Manager of Group Procurement, I attest that St Vincent's Health Australia has implemented robust and evolving procurement practices to identify, assess, and address modern slavery risks across our supply chains.

In 2025, our approach has continued to mature from foundational compliance activities to a more targeted and intelligence-driven model. Through our Supplier Due Diligence Program, we are directly engaging with high-risk and high-spend suppliers, strengthening transparency and accountability across critical categories that represent the majority of our addressable spend.

We have embedded modern slavery considerations into core procurement processes, including supplier onboarding, tender evaluation, and contract management. Mandatory modern slavery criteria are now integrated into sourcing decisions, supported by updated contract clauses and a strengthened Supplier Code of Conduct that establishes clear expectations on labour practices and human rights.

Recognising the complexity and global nature of our supply chain, we have also enhanced our engagement beyond platform-based assessments. This includes direct dialogue with suppliers, collaboration with industry partners, and participation in multi-platform risk assessment strategies to improve coverage and data quality.

Importantly, our procurement function continues to play a critical role in identifying emerging risks, including those driven by geopolitical instability, regulatory changes, and evolving supplier ecosystems. We are strengthening visibility across sub-tier suppliers and aligning our practices with international best practice frameworks to ensure a consistent and proactive response to these risks.

While significant progress has been made, we acknowledge that risks persist and require ongoing vigilance, collaboration, and continuous improvement. We remain committed to leveraging our procurement influence to drive ethical practices, uphold human rights, and contribute to the elimination of modern slavery within our supply chains.

Renee Hodge
General Manager, Group Procurement
St Vincent's Health Australia

About St Vincent's

For more than 165 years, St Vincent's has been a leader in Australian health and aged care. Our story began in 1838 with five Sisters of Charity, who went on to open our first hospital in 1857. Today, we are a unique not-for-profit organisation including inner city major health networks in Melbourne and Sydney, 10 private hospitals, 25 aged care facilities, and a growing range of virtual and home care services across three states.

Our team of more than 30,000 employees, visiting medical officers (VMOs), and volunteers stretches the eastern seaboard, from regional Queensland to Melbourne's suburbs. Each year, we have over two million connections with patients and residents, including 1.3 million outpatient appointments, 330,000 admissions, and 139,000 emergency department presentations.

Our innovation precincts in Sydney and Melbourne are home to globally renowned medical institutes we established, such as the Victor Chang Cardiac Research Institute, the Garvan Medical Research Institute, and the Aikenhead Centre for Medical Discovery. Our services, clinicians, and

researchers are behind some of Australia's most significant medical breakthroughs.

Our public health networks serve as major referral centres for rural and regional communities. We provide specialised emergency and trauma services in inner-city Melbourne and Sydney and are recognised for our world-class surgical capacity in heart and lung transplantation, orthopaedics, neurosurgery, cardiothoracic, and cancer care. We are also national leaders in palliative care, diabetes, genomic medicine, aged care, and biomedical engineering.

At the heart of everything we do is our mission to express God's love to those in need, and across St Vincent's we find that patients and residents say they come to St Vincent's because of who we are. It's in the way our staff greet them and take the time to listen and care for what they need. No matter who or where you come from, everyone matters at St Vincent's.

Because of our mission to love those who are most in need, we are also a leading provider of services for people experiencing homelessness, drug and

alcohol dependence, people living with mental illness, and correctional health patients.

We are dedicated to building stronger relationships and providing better health outcomes for Aboriginal and Torres Strait Islander peoples and communities across all our services.

The St Vincent's promise to its people, patients, residents, partners, and the broader community is to provide better and fairer care, always.

The parent company of the group is St Vincent's Health Australia Ltd ABN 75 073 503 536.

The following are wholly owned subsidiaries of St Vincent's Health Australia Ltd:

- St Vincent's Hospital Sydney Limited
- St Vincent's Hospital (Melbourne) Limited
- St Vincent's Private Hospitals Ltd
- St Vincent's Care Services Ltd
- St Vincent's Community Health Ltd
- St Vincent's Healthcare Ltd

The following is an affiliated hospital:

- St Vincent's Private Hospital Sydney

St Vincent's annual revenue for the financial year 2024-2025 can be noted at the ACNC Register.

2 major public networks

10 private hospitals

30,000
people

2 million
connections with patients and residents

2467
residential aged care beds

25
aged care facilities

6
co-located institutes





Our mission

We express God's love through the healing ministry of Jesus. We are especially committed to people who are poor or vulnerable.

Our vision

Every person, whoever and wherever they are, is served with excellent and compassionate care, by a better and fairer health and aged care system.

Our values



Compassion

Our care is an act of love. We are present to and accompany people as they are, and as they need.



Justice

Our pursuit of what is right and just empowers us to speak and act with courage on behalf of those in need.



Integrity

Our actions and decisions are transparent and aligned with our values.



Excellence

Our services are safe and evidence-based, and we continually seek to improve in everything we do.



Our structure, operations and supply chains

Our Structure

St Vincent's is a group of not-for-profit non-listed entities. St Vincent's Health Australia Limited is a public company limited by guarantee and is registered with the Australian Charities and Not-for-profits Commission.

St Vincent's is governed by a Board of Directors ("Board"). The Board exists to ensure there is effective integration and growth of the mission of Mary Aikenhead Ministries throughout the health and aged care services and to govern the St Vincent's group of companies pursuant to the Australian Charities and Not-for-profits Commission Act 2012 (Cth), canon law, and all other relevant civil legislation. The Board must at all times operate within the Mary Aikenhead Ministries Ethical Framework and the Catholic Health Australia Code of Ethical Standards of Health and Aged Care Services in Australia (2001). The day-to-day running of St Vincent's is the responsibility of the Executive Leadership Team led by the Group Chief Executive Officer.

Board of Directors

The Board is accountable for its key purpose to The Trustees of Mary Aikenhead Ministries ('TMAM'). Mary Aikenhead Ministries builds on the charism and traditions of the Sisters of Charity and Mary Aikenhead, founder of the Sisters of Charity. The Trustees are the canon law and civil stewards of SVHA. All Directors serve as independent non-Executive Directors and are appointed by TMAM.

Board Committees

All Board Committees operate under their own Charter which is approved by the Board. Committees are permitted to appoint external experts to assist them in their consideration of matters. The Board is supported by seven standing Committees: Audit & Risk; Finance & Investment; Mission, Ethics & Advocacy; People & Culture; Clinical Governance & Experience; Research & Education; and Aged Care.

The St Vincent's Modern Slavery Governance Framework

The Modern Slavery Working Group referenced in the earlier years has evolved to shape into the Anti-Modern Slavery Program (AMSP). It is convened by our Modern Slavery Liaison Officer, a dedicated resource focused on anti-modern slavery efforts across the organisation's operations and supply chain, including the risk framework and mitigation activities. The AMSP is sponsored by our St Vincent's Group Mission Leader who advocates this work to the organisation's Mission, Ethics and Advocacy Board Committee and subsequently to the full St Vincent's

Board. The AMSP is also sponsored by our Group Chief Financial Officer for the governance of risks across the supply chain and operations. who then sponsors the modern slavery matters to the Board Audit and Risk Committee.

Below, we outline the integration of our AMSP framework throughout our operations, encompassing both corporate and clinical environments and the supply chain. Team members working on the underlying program meet periodically to progress specific projects or as needed.

Our Modern Slavery Governance Framework



Our operations

St Vincent's is a unique not-for-profit social enterprise that operates two major inner-city health networks in Melbourne and Sydney, 10 private hospitals, 25 aged care facilities – with more than 6,300 hospital and residential aged care beds – and a range of virtual and home care options across NSW, Victoria and Queensland.

We have a team of close to 30,000 dedicated and talented team members and 1,000 volunteers working in their areas of expertise, from regional Queensland to Melbourne's western suburbs. Our reach means St Vincent's has more than two million contacts with patients and residents – including 330,000 admissions, 139,000 Emergency Department presentations, and more than 100,000 in-home care interactions – annually.

Our integrated health innovation precincts in Sydney and Melbourne house globally-renowned medical institutes, all founded by St Vincent's, including the Victor Chang Cardiac Research Institute, the Garvan Medical Research Institute, the St Vincent's Institute of Medical Research, the Aikenhead Centre for Medical Discovery, the St Vincent's Centre for Applied Medical Research, and the Nursing Research Institute. Across our hospitals and co-located institutes, the St Vincent's research footprint is one of the biggest in Australia with 2,500 researchers and 3,000 annual publications.

Our work in FY25 was guided by the unwavering mission of St Vincent's: to provide care, first and foremost, to the most disadvantaged and marginalised members of our community.

This mission is brought to life through our vision: to see every person, whoever and wherever they are, served with excellent and compassionate care, by a better and fairer health and aged care system.

Our Group Strategy details the path we take to realise this vision. The strategy focuses our efforts on three key strategic priorities.

1. Enhance Our Impact

Continuously improve our care, enhancing positive impacts for our patients, people, and planet.

2. Connect Care

Work together, building our shared capabilities and services to create the future of connected health and aged care.

3. Transform the System

Work with partners to shape a better and fairer health and aged care system for all Australians.

To ensure continuous progress against these priorities, we focus our efforts on making meaningful contributions across six critical Strategic Arenas. These arenas serve as the core framework for our operational focus, investments, and reporting this year, ensuring our actions directly translate the strategy into measurable impact.

Our strategic arenas



Health equity

Unique care for underserved populations, addressing inequity and social determinants.



Healthy ageing

Better care pathways and residences for older people, integrating health, social and care needs.



Research and innovation

Globally renowned research and innovation, catalysed by cross-sector collaboration in precincts.



Chronic care platforms

Accessible, holistic and lifelong care platforms for preventing and managing chronic conditions.



Virtual and at-home care

Advanced virtual/at-home care, with hospitals as hubs, serving local, state and national needs.



Health leadership

The best leaders in health and aged care in Australia, supported by outstanding training and development.

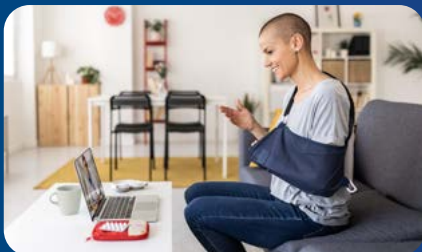
A new chapter in better and fairer care

In November 2025 we launched the next stage of our strategy: **Bringing Care Home**. This is our five-year plan to deliver Australia's largest virtual and home care system, with half of our services to be delivered at home or via digital and virtual means.

Just as the Sisters of Charity embarked on an ambitious mission to change health care and reach people on the streets and in their homes, St Vincent's is taking an ambitious step forward to reshape Australia's health and aged care systems and deliver better, fairer

care to everyone. By reaching beyond our hospital walls to serve more people at home and online, we're creating a system of care that's more connected, more equitable and more sustainable.

Our three domains of care



Acute

Hospital grade care at home improving the end-to-end experience, treatment and recovery for those with acute conditions – enhancing patient outcomes and improving hospital productivity.



Chronic

Helping people prevent, detect, treat and live well with chronic conditions at home – empowering people, reducing hospital visits and improving long-term outcomes.



Ageing

Supporting ageing Australians to receive high-quality care at home or in their RAC facility – minimising hospital transfers and enabling quicker returns from hospital stays.

Supported by

- Transforming our precincts and facilities as locations of excellence, research, education and collaboration.
- A new digital end-to-end experience for our patients, residents and people.
- Industry-leading clinical command and delivery.

Our locations



Our National Services

- Hospital in the Home (HITH)
- Residential In-reach Program
- GEM@Home
- Cancer@Home
- Pallcare@Home
- Rehab@Home
- Transition Care Program
- Domiciliary Allied Health
- Community Nursing and Post Acute Care
- Home Care Packages
- Telehealth and telemedicine
- THIS WAY UP
- HealthMonitor
- Commonwealth Home Support Program



Queensland

Our private hospitals

- St Vincent's Private Hospital Northside
- St Vincent's Private Hospital, Brisbane
- St Vincent's Private Hospital, Toowoomba

Foundations

- St Vincent's Foundation Queensland

Retirement Villages

- Bardon
- Boondall
- Carseldine
- Enoggera
- Mitchelton
- Southport

Our care services

- St Vincent's Care Bardon
- St Vincent's Care Boondall
- St Vincent's Care Carina
- St Vincent's Care Carseldine
- St Vincent's Care Corinda
- St Vincent's Care Kangaroo Point
- St Vincent's Care Mitchelton
- St Vincent's Care Toowoomba
- St Vincent's Care Southport
- St Vincent's Care Arundel
- St Vincent's Care Maroochydore
- St Vincent's Care Gympie





New South Wales

Our public health hospitals and services

- St Vincent's Hospital Sydney
- Sacred Heart Health Service
- St Vincent's Correctional Health Parklea

Our private hospitals

- Mater Hospital, North Sydney
- St Vincent's Private Hospital, Sydney
- St Vincent's Private Community Hospital, Griffith
- St Vincent's Clinic

Our care services

- St Vincent's Care Haberfield
- St Vincent's Care Heathcote
- St Vincent's Care Auburn
- St Vincent's Care Bronte
- St Vincent's Care Edgecliff
- St Vincent's Care Yennora

Research

- Garvan Institute of Medical Research
- Victor Chang Cardiac Research Institute
- St Vincent's Centre for Applied Medical Research
- Nursing Research Institute

Foundations

- St Vincent's Curran Foundation
- Friends of the Mater

Retirement Villages

- Auburn
- Heathcote



Victoria

Our public health hospitals and services

- St Vincent's Hospital Melbourne
- St Vincent's on the Park
- Caritas Christi
- St George's Health Service
- Berengarra
- Auburn House
- Prague House

Our private hospitals

- St Vincent's Private Hospital, East Melbourne
- St Vincent's Private Hospital, Fitzroy
- St Vincent's Private Hospital, Kew
- St Vincent's Private Hospital, Werribee

Our care services

- St Vincent's Care Hawthorn
- St Vincent's Care Kew
- St Vincent's Care Eltham
- St Vincent's Care Werribee

Research

- The Aikenhead Centre for Medical Discovery
- St Vincent's Institute of Medical Research

Foundations

- St Vincent's Foundation (Victoria)



Our supply chain

St Vincent’s has a diverse and complex global supply chain. Our largest suppliers operate throughout the Asia-Pacific region, South Asia, Northern, Southern and Central America, Europe and Australia. We source over \$1.4 billion per annum in addressable spend across clinical and non-clinical goods and services from over 4300 suppliers.

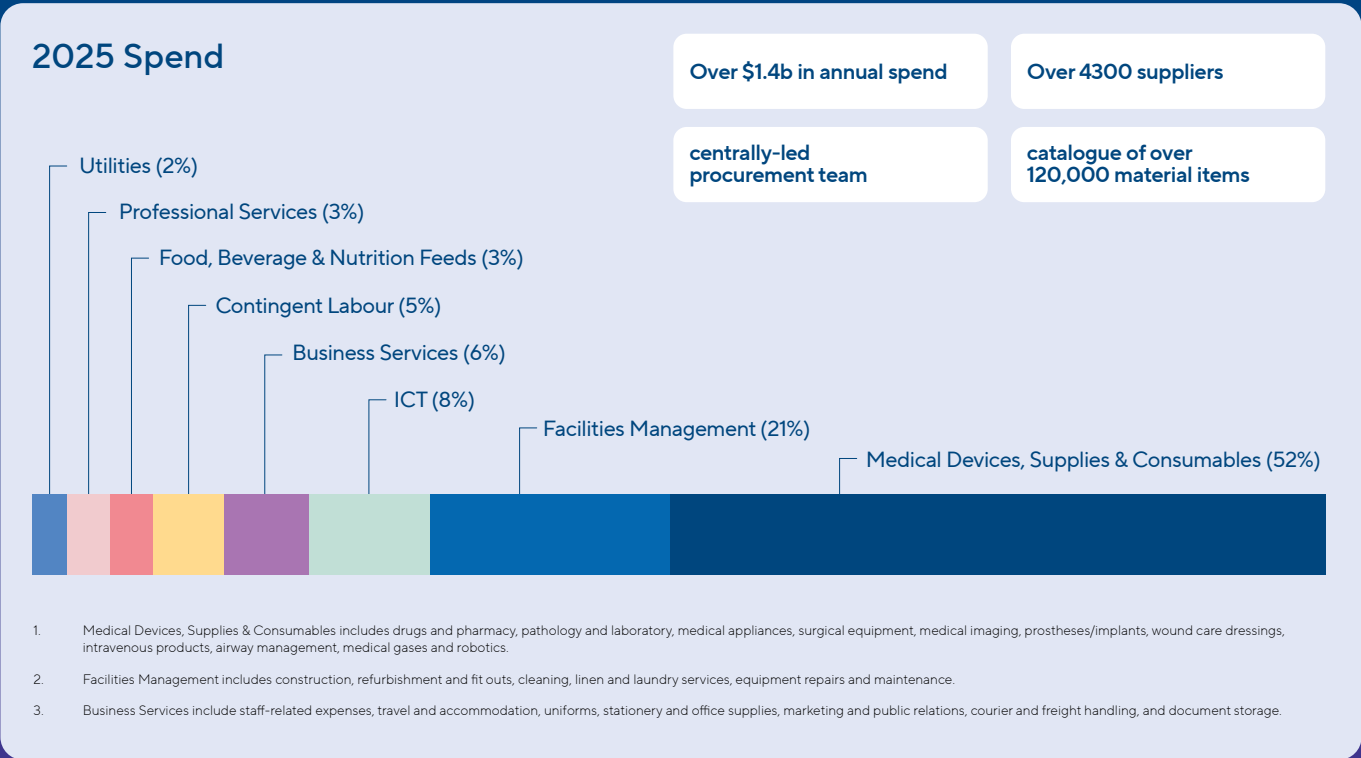
St Vincent’s has a diverse and complex global supply chain. Our largest suppliers operate throughout the Asia-Pacific region, South Asia, Northern, Southern and Central America, Europe and Australia. We source over \$1.4 billion per annum in addressable spend across clinical and non-clinical goods and services from over 4300 suppliers.

Our clinical supply chain comprises general medical and surgical consumables, drugs and pharmacy, pathology and laboratory, medical devices, medical imaging, surgical equipment and prostheses/implants, wound care dressings,

intravenous products, airway management, medical gases and robotics. Our non-clinical supply chain encompasses ICT, construction, facilities maintenance, cleaning, food and beverage, linen and laundry services, uniforms and equipment, servicing and repairs, contingent labour, and corporate overheads such as office supplies and travel.

A centrally-led procurement team, Group Procurement Services, oversees all St Vincent’s strategic procurement and supply chain activities, including the contractual arrangements which cover clinical and non-clinical categories across the organisation. Group Procurement also manages the catalogue of material goods, holding over 120,000 material items. Individual facilities are responsible for supply chain teams to manage the day-to-day purchasing and supply at a local level.

The supply chain is underpinned by over 900 formal commercial contracts.



Identification of modern slavery risks in our operations and supply chain

Overview

In this statement, we have significantly updated our risk identification approach by incorporating insights from recent geopolitical developments; best practice guidelines from the UN Guiding Principles on Business and Human Rights; the OECD Due Diligence Guidance; the Walk Free Global Slavery Index, and Office of the NSW Anti-slavery Commissioner's Guidance on Reasonable Steps.

A key aspect of this year's statement is the acknowledgement that modern slavery risks are becoming more fluid, interconnected, and influenced by macro-level factors beyond the direct control of any single organisation or entity. Ongoing armed conflicts, economic fragmentation, climate-induced displacement, inflationary pressures, and disruptions in global logistics have notably altered the vulnerability landscape of workers throughout the supply chains and operations.

Consequently, this section marks our shift from adopting a static compliance model to embracing a dynamic risk intelligence model, guided by:

- Real-time monitoring of geopolitical and conflict zones
- Mechanisms to capture worker voices, including surveys of migrant workers
- Insights from survivors through our frontline screening program
- Cross-sector collaboration with other healthcare organisations with shared clinical supply chains and developments in ESG governance and emerging regulatory frameworks; and
- Risk prioritisation focused on rights-holders, consistent with the UN GP salient risk concept.

Emerging and Evolving Risks in 2025

St Vincent's continues to monitor emerging and shifting risks due to geopolitical unrest, supply chain interruptions, labour market instability, technological progress, climate-related migration, and regulatory shifts. A range of external

developments continue to impact the global risk landscape related to forced labour, exploitation, human trafficking, and modern slavery, highlighting the necessity for a flexible, intelligence-based approach to identifying risks.

1. Geo-Political Instability and Armed Conflict

Rights Holder Centred Lens

Best practice guidelines recommend a change in focus from 'company risk' to 'rights-holder risk'. This involves not only evaluating which suppliers could pose issues but also determining which workers or communities are at the highest risk of severe harm. During periods of geopolitical instability, the most vulnerable groups, such as displaced individuals, refugees, irregular migrants, and workers in unstable regions, are at an increased risk of exploitation in multiple ways simultaneously.

The intensifying conflicts in the Middle East (Iran, Gaza, Lebanon, Yemen, and Syria), the ongoing war in Ukraine, instability in the Sahel and the Democratic Republic of Congo (DRC), and the increasing fragmentation of the global economy have worsened conditions related to the clinical and non-clinical goods and services we obtain from global suppliers. The displacement of populations, weakened labour protections, supply shortages, sanctions, inflationary pressures, and rapid labour migration are associated with the following:

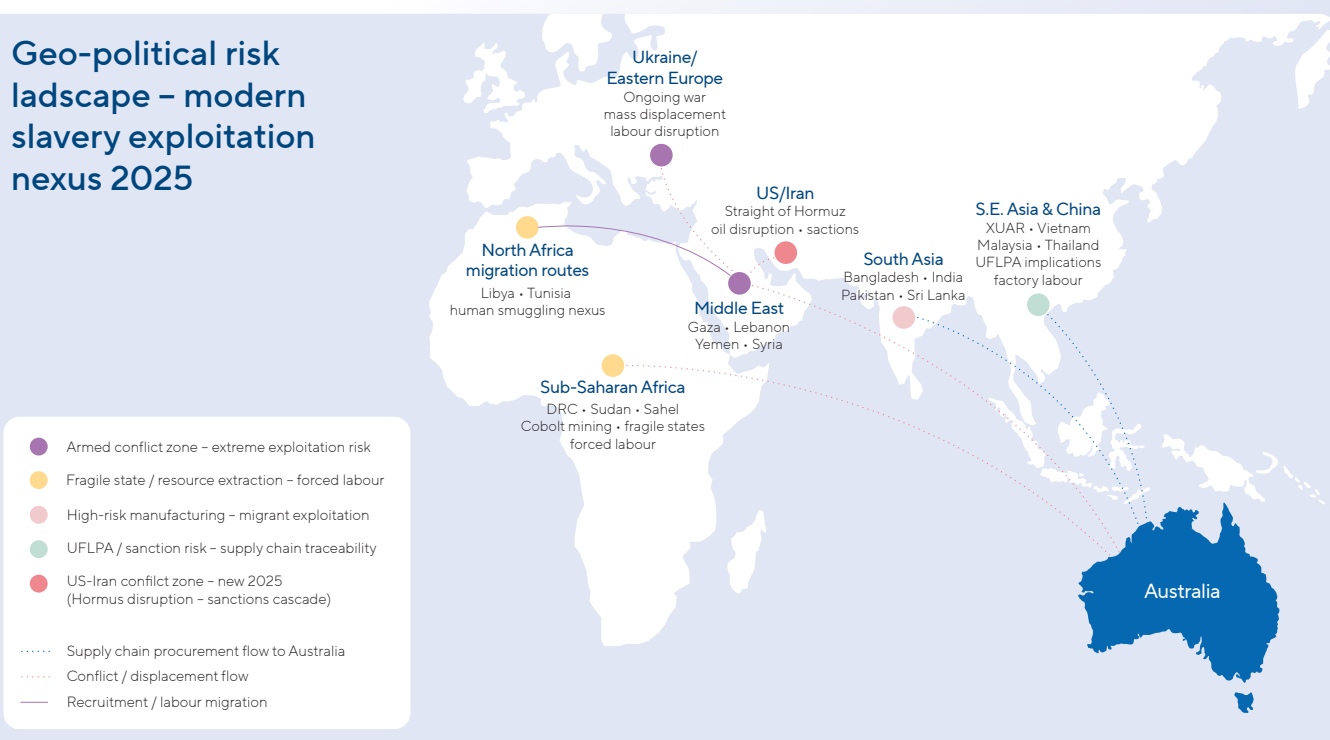
- Recruitment deception and debt bondage among displaced workers;
- Forced labour among refugees and internally displaced persons;

- Informal and undocumented labour arrangements to address supply shortages;
- Increased subcontracting and opaque sourcing as companies look for alternative suppliers;
- Wage theft, excessive working hours, and coercive labour practices under economic pressure;
- Heightened vulnerability among temporary visa holders and seasonal migrants; and
- Sanctions-driven sourcing shifts to less-regulated jurisdictions.

These risks may indirectly impact healthcare procurement through disrupted global supply chains, particularly in pharmaceuticals and medical consumables, PPE and surgical instruments, ICT electronics (cobalt, critical minerals), textiles and uniforms, food supply chains, and construction materials. The St Vincent's strategy to address escalating geopolitical risks includes:

- Integrating geopolitical escalation indicators into our annual risk assessments, using the Walk Free Global Slavery Index, Armed Conflict Location and Event Data (ACLED), and UNHCR displacement statistics;
- Monitoring sanctions-related sourcing shifts and their implications for our supplier base;
- Evaluating supplier business continuity and labour practices during crisis periods, including rapid supplier substitution strategies;
- Incorporating conflict-sensitive procurement considerations into our Supplier Due Diligence Program; and
- Increasing scrutiny of tier-2 and tier-3 suppliers in conflict-affected regions.

Geo-political risk landscape – modern slavery exploitation nexus 2025



2. Climate Change, Displacement, and Labour Exploitation

Increasing climate-related disasters, extreme weather, agricultural disruptions, and resource scarcity as drivers of forced migration and labour exploitation adds a new element to our five-layer risk framework, which was not part of our 2022 foundational model.

Populations susceptible to climate change are at a greater risk of becoming victims of exploitative recruitment, perilous migration, informal labour practices, exploitative work in agriculture and manufacturing, and human trafficking. Healthcare supply chains that rely on agriculture, textiles, food production, and global manufacturing may face elevated risks when climate shocks disturb local labour markets, forcing rural workers into precarious, urban labour markets.

This evolving risk element will be officially incorporated into the St Vincent's annual risk horizon scanning activities beginning in 2026, with a concentrated focus on food and beverage supply chains, linen and textile sourcing, and contingent labour from climate-vulnerable regions in the Pacific, Southeast Asia, and South Asia.

3. Uyghur Forced Labour Prevention Act (UFLPA) and Supply Chain Transparency

St Vincent's continues to undertake supply chain due diligence in relation to materials originating from the Xinjiang Uyghur Autonomous Region (XUAR), including our suppliers' compliance with, and disclosures under, the US Uyghur Forced Labour Prevention Act (UFLPA) related to XUAR sourcing. We are particularly concerned with scrutinising traceability capabilities across electronics, textiles, medical manufacturing, and solar energy supply chains, and analysing the downstream effects on our procurement practices. The risks associated with the Australian solar panel supply chain are continuously observed.

4. Migrant Worker Debt Bondage in the Recruitment Pipeline

Worker Voice Mechanism – Best Practice Integration

Best practice guidelines, such as the UN Guiding Principles and the IRIS (International Recruitment Integrity System) from the International Organization for Migration (IOM) Standard for ethical recruitment of migrant labour. These collectively highlight the essential role of incorporating worker voice mechanisms into risk identification processes. Surveys conducted with St Vincent's hiring managers and labour hire agencies in 2024, along with migrant worker surveys in 2024/25 in collaboration with the Migrant Justice Institute at UNSW, aim to uncover recruitment risks that are not visible through traditional supplier audits.

In 2024, St Vincent's Anti-Modern Slavery Program Team-led research involving hiring managers and labour hire agencies uncovered a widespread lack of awareness regarding recruitment fee practices that could potentially lead to debt bondage as defined by international standards. With approximately 20% of St Vincent's workforce being visa holders, many of whom come from high-risk recruitment areas in Southeast Asia, Africa, and the South Pacific, this issue is of considerable importance and has direct implications for St Vincent's as an employer.

The recruitment process can introduce key risks including deceptive recruitment practices in workers' home countries, recruitment fees that result in debt bondage before arrival, dependency on visas coupled with coercive control, contract substitution, wage underpayment through labour hire arrangements, and a lack of awareness among workers about their rights and available grievance mechanisms.

5. Survivor Misidentification – Overlap with Family and Domestic Violence

System Integration – Best Practice Application

Identifying the risk of modern slavery is most effective when incorporated into existing clinical and compliance procedures. Embedding modern slavery screening criteria within the current framework for family and domestic violence screening directly puts this best practice principle into action.

In 2024, our pilot screening initiative, funded by a Commonwealth Grant, identified 13 instances of modern slavery among patients in public hospitals in Melbourne and Sydney. Notably, four of these individuals had been incorrectly classified as victims of family and domestic violence in other healthcare environments, while five went unrecognised despite numerous interactions with health services. This highlights a systemic failure in identification, resulting in significant operational issues, such as survivors not being linked to the necessary specialist referral pathways. To address this issue, it is crucial to incorporate modern slavery screening criteria into clinical settings throughout public and private hospital networks.

6. Investment Portfolio Exposure

As investor expectations, ESG-disclosure requirements, and responsible investment frameworks continue to develop, awareness of the risk of modern slavery in investment portfolios is also changing. St Vincent's investment portfolio, valued at approximately \$379.5 million in FY2025, introduces a significant risk factor.

We continue to assess external fund managers, their adoption of the Investors Against Slavery and Trafficking Asia Pacific (IASTAPAC) principles, human rights screening practices, and their exposure to companies in high-risk sectors and regions. This highlights that modern slavery risks are not limited to direct procurement but also involve financial relationships and capital allocations. This will be formally integrated into our annual investment manager review process, starting in 2026.

7. Artificial Intelligence and Automated Procurement

AI as an emerging area of attention

Given the rapid growth and development of AI, automated procurement will be an area of further development in future reports.

With the global rise in the use of AI-driven procurement tools and digital sourcing platforms, there is a potential risk that automated purchasing decisions may prioritise cost savings or speed over human rights considerations. To counter this, we revised our tendering procedures in 2024 to incorporate mandatory modern slavery criteria that cannot be overridden by algorithmic processes. Additionally, we are actively observing the evolution of AI governance frameworks in healthcare procurement and intend to integrate new insights into our Supplier Code of Conduct and procurement policy assessments.

8. Expanding Regulatory and Mandatory Due Diligence Obligations

The regulatory environment surrounding modern slavery and human rights due diligence is rapidly transforming globally. Throughout the EU, the Corporate Sustainability Due Diligence Directive (CSDDD) has been enacted or is under consideration, and similar legislative efforts are underway in the UK, Germany, and France. In Australia, discussions are intensifying as part of the ongoing review of the Modern Slavery Act.

These legislative shifts impose compliance obligations on our international suppliers, thereby enhancing our leverage to insist on supply chain transparency and sustainability. Furthermore, they raise the bar for Australian reporting-entities, requiring them to exhibit concrete and quantifiable advancements beyond mere narrative accounts.

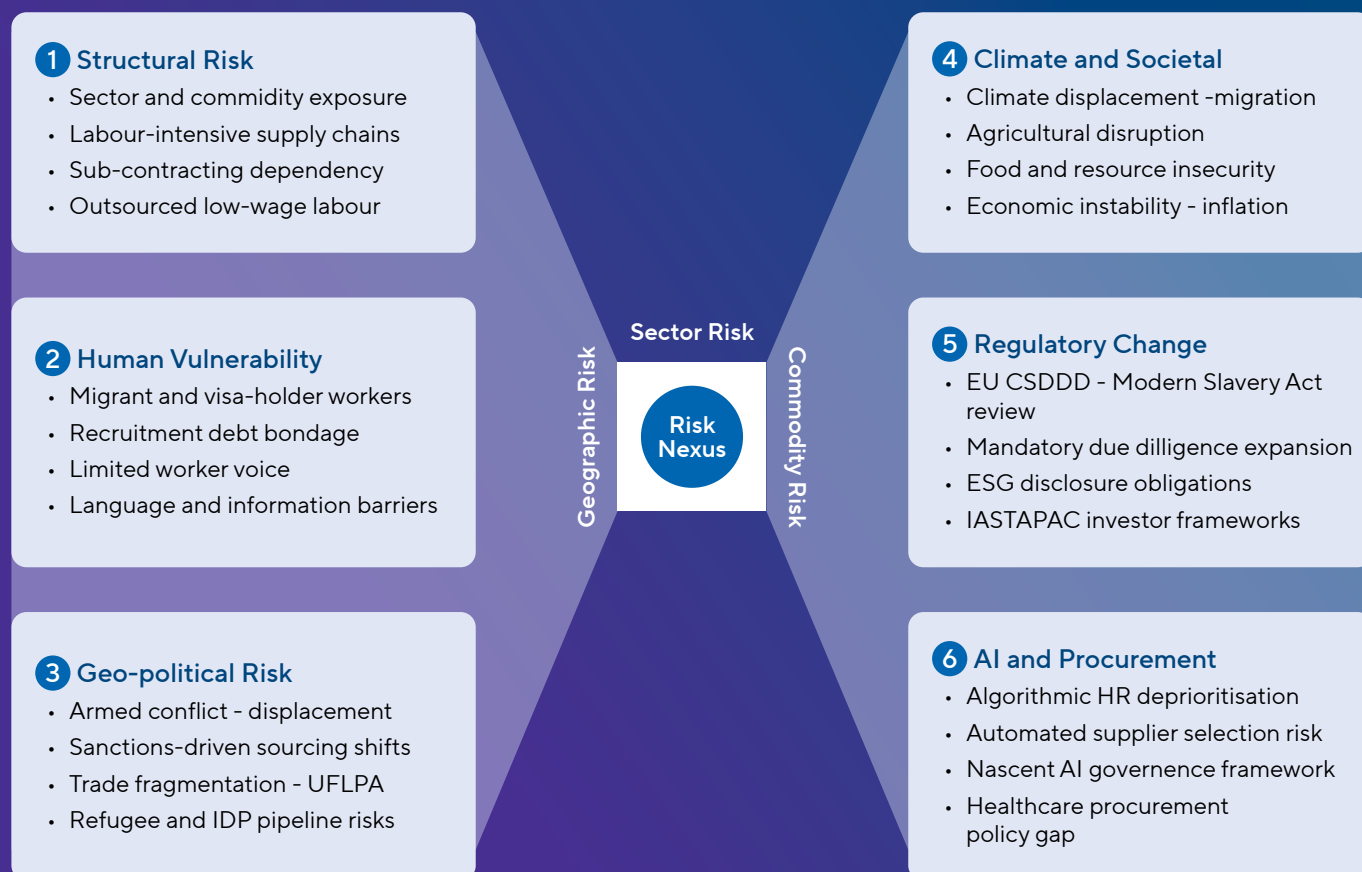
St Vincent's is tracking these regulatory shifts and has ensured that our due diligence frameworks, supplier engagement strategies, and reporting mechanisms are sufficiently adaptable to comply with any mandatory due diligence requirements that may be introduced in Australia.



Evolving from a Static to a Dynamic Risk Model

In 2022, St Vincent's introduced a three-dimensional framework for assessing risk, focusing on sector, commodity, and geographic risks. This foundational model has been instrumental in forming our risk taxonomy and supplier due-diligence initiatives. After conducting a comprehensive review, we have transformed this model into a dynamic structure that more accurately captures the intricacies of the current global risk landscape.

Enhanced Dynamic Modern Slavery Risk Assessment Framework



Transition: Static Compliance Model → Dynamic Risk Intelligence Model

Real-time scanning • Worker voice • Survivor insights • Cross-sector collaboration • ESG governance

Enhanced Risk Taxonomy

Our risk taxonomy has been substantially expanded from a 17-category, 3-domain model into a 21-category, 5-domain enterprise-wide risk ecosystem. The two new domains – Strategic/ Financial Risk and Emerging Systemic Risk – incorporate risk categories that our continuous learning framework identified as material but previously under-represented in the formal taxonomy.

The subsequent sections offer an in-depth risk assessment for each of the 21 categories sorted by domain. Each table outlines the risk level for the sector, geographic exposure, primary risk drivers, and emerging risk factors of the sector. Categories marked in amber were newly added in 2025.

Enhanced Risk Taxonomy – 21 Categories Across 5 Domains

Supply Chain	Workforce	Operations	Strategic	Emerging Systemic
Medical Devices & Consumables	Contingent Labour – Nursing	Facilities Management	Investment Portfolio	Geo-Political Instability NEW 2025
Property & Construction	Contingent Labour – Allied Health	Cleaning Services & Supplies	Grievance Mechanisms	Climate Displacement NEW 2025
Food, Beverages & Nutrition	Frontline Staff Wellbeing	Kitchen & Housekeeping		Regulatory Change NEW 2025
ICT Hardware & Printers		Screening of Survivors in Clinical Settings NEW 2025		AI and Automated Procurement NEW 2025
ICT Phones & Comms				
Utilities incl. Waste				
Stationery & Office Supplies				
Uniform & Workwear				



Disclaimer: The risks mentioned in this statement are based on insights from both global and national sources and do not indicate their existence within St Vincent's operations, workforce, or supply chain. Their inclusion is intended to highlight the wider context of modern slavery risks pertinent to the healthcare sector and organisations of comparable size and complexity, and we remain alert and vigilant about these issues.

Eight Categories (External Suppliers)

St Vincent's supply chain is organized into eight distinct categories, each characterized by substantial international procurement, complex sub-tier arrangements, and susceptibility to high-risk manufacturing areas. Key systemic challenges include meeting UFLPA compliance standards, securing critical minerals such as cobalt from the Democratic Republic of Congo, and addressing issues within the garment and textile industries, which are notorious for their histories of forced labour and gender-based exploitation.

Risk Category	Sector Risk	Geographic Risk	Key Risk Drivers	Emerging Risk Drivers
Medical Devices, Supplies & Consumables	HIGH - Multinational suppliers, complex sub-tiers	China, Malaysia, India, Vietnam, SE Asia	Surgical instruments, gloves, PPE, cobalt batteries, pharmaceuticals; UFLPA-impacted suppliers	UFLPA, global shortages, conflict-driven sourcing, cobalt mining
Property & Construction	HIGH - Labour hire, migrant workers, rapid sub-contracting	Domestic; materials from SE Asia	Undocumented workers, document confiscation, deceptive recruitment; conflict-driven cost pressure	Labour hire, migrant workers, rapid sub-contracting during crisis
Food, Beverages & Nutritional Feeds	HIGH - Seasonal labour, climate-vulnerable agriculture	Domestic; Asia-Pacific imports	Forced labour, restricted movement, underpayment; climate shocks destabilise source communities	Climate disruption, migrant agricultural labour, seasonal exploitation
ICT Hardware & Printers	HIGH - Global electronics; production shifts under sanctions	China (XUAR), Vietnam, Malaysia, India	Cobalt mining DRC, XUAR factory labour, recruitment fees; UFLPA compliance monitoring required	Critical minerals (cobalt, DRC), XUAR factory labour, UFLPA
ICT Phones & Communications	HIGH - Tier-2 risks shared with ICT hardware	China, DRC cobalt	Same cobalt and factory risks; all global telco providers implicated	Shared Tier-2 risks with ICT hardware; cobalt supply chain
Utilities incl. Waste Management	MED-HIGH - Labour hire; migrant low-skill workers	Domestic	Hazardous conditions, sub-contracting, wage non-compliance	Migrant low-skill labour, sub-contracting, hazardous conditions
Stationery & Office Supplies	MEDIUM - Supplier changed 2023; SE Asia link ongoing	China, SE Asia	Transitioning to local/First Nations supply; catalogue review ongoing	SE Asia manufacturing; transitioning to local/First Nations supply
Uniforms & Workwear	HIGH - Textile sector: documented forced labour	Bangladesh, India, China, SE Asia	Forced labour, gender exploitation, wage theft in garment manufacturing	Garment sector: forced labour, gender exploitation, fast production

Three Categories (Operational / Internal)

Our workforce retains the potential for exploitation associated with temporary and agency-sourced labour, focusing on overseas nurses and allied health professionals. The pathway of debt bondage - beginning with an international broker on some occasions and culminating in employment within

healthcare facilities - is a significant and well-documented avenue for exploitation. Furthermore, the well-being of frontline staff is considered an operational risk due to the documented effects of vicarious trauma on those working with survivors of modern slavery.

Risk Category	Sector Risk	Geographic Risk	Key Risk Drivers	Emerging Risk Drivers
Contingent Labour – Nursing	HIGH - Labour hire; visa-holder workers	SE Asia, Africa, South Pacific	Debt bondage from recruitment fees; visa dependency; underpayment; low awareness of rights	Visa dependency, debt bondage, recruitment fee charging
Contingent Labour – Allied Health	HIGH - Same structural risks as nursing	SE Asia, Africa, South Pacific	Post-COVID demand surge; rapid visa-to-work pipelines; exploitation risk elevated	Same structural risks as nursing; rapid demand growth post-COVID
Frontline Staff Wellbeing (Vicarious Trauma)	MEDIUM - Recognised 2024; operational wellbeing risk	Domestic (all states)	Secondary trauma from survivor work; burnout; staff safety and support infrastructure	Vicarious trauma from working with survivors of severe exploitation

Four Categories (Internal / External Mixed)

There are also modern slavery risks embedded in St Vincent's day-to-day facility management, services, and clinical environments. Three particular areas - Facilities Management, Cleaning Services, and Kitchen & Housekeeping - are characterised by sub-contracting arrangements, migrant labour concentration, and historically elevated non-

compliance rates. A fourth category, Screening of Survivors in Clinical Settings, was added in 2025 to address the identified gap in clinician awareness of modern slavery indicators and strengthen trauma-informed referral pathways across St Vincent's public hospitals.

Risk Category	Sector Risk	Geographic Risk	Key Risk Drivers	Emerging Risk Drivers
Facilities Management	HIGH - Sub-contracting; migrant workers	China, Thailand, Vietnam (equipment)	Labour hire non-compliance; cleaning, security, maintenance; opaque sub-contracting chains	Sub-contracting chains; equipment from China, Vietnam, Thailand
Cleaning Services & Supplies	HIGH - High historical non-compliance rates	Domestic; equipment SE Asia	Wage theft, excessive hours; in-house labour hire at some facilities	High non-compliance rates; some in-house labour hire
Kitchen & Housekeeping	MED-HIGH- Sub-contracted or agency-staffed	Domestic; food from Asia-Pacific	Links to food sector and migrant labour; concentration of vulnerable workers	Sub-contracting; links to food sector and migrant labour risks
Screening of Survivors in Clinical Settings NEW 2025	NEW 2025- Clinical identification gap	Domestic (all hospitals)	Low clinician awareness of modern slavery indicators; limited confidence in trauma-informed responses; clinical referral pathway gaps	Lack of clinician knowledge of indicators; low confidence in trauma-informed responses and referral pathways

Two Categories

St Vincent's also focussed on addressing modern slavery risks at the level of organisational governance, which includes investment activities and the efficiency of internal grievance and reporting systems.

Risk Category	Sector Risk	Geographic Risk	Key Risk Drivers	Emerging Risk Drivers
Investments Portfolio	MEDIUM - Growing ESG exposure	Global (fund-dependent)	Exposure via investment in companies with poor human rights practices; IASTAPAC framework adoption	ESG exposure; fund manager due diligence; IASTAPAC framework
Awareness of Grievance Mechanisms	MED-HIGH - Systemic staff and supplier gap	Domestic (all facilities)	Low awareness among migrant and contract staff; language barriers; accessible channels under development	Low staff awareness; language barriers; migrant worker gap

Emerging Systemic

Four New Categories (Added 2025)

In 2025, four new categories were added to the taxonomy to address systemic risk drivers that were previously not sufficiently captured within our risk framework. These categories are geo-political instability, climate-related displacement, the evolving regulatory landscape of mandatory due diligence, and emerging governance challenges linked to Artificial Intelligence in procurement. All four amplify risk across multiple domains and necessitate monitoring at both the strategic and operational levels.

Risk Category	Sector Risk	Geographic Risk	Key Risk Drivers	Emerging Risk Drivers
Geo-Political Instability NEW 2025	HIGH -Active conflict zones; displacement crises	Middle East, Ukraine, DRC, Sahel	Supply chain disruption; refugee labour pipelines; sanctions-driven sourcing to less-regulated markets	Conflict displacement; sanctions-driven sourcing; migration flows
Climate Displacement NEW 2025	MEDIUM-HIGH - Climate migration risk growing	Pacific, SE Asia, South Asia	Agricultural disruption; unsafe migration; predatory recruitment of climate-displaced workers	Climate migration to labour markets; agricultural disruption
Regulatory Change NEW 2025	MEDIUM - Trajectory toward mandatory obligations	EU, UK, Australia	CSDDD, Modern Slavery Act review; investor and reporting entity obligations expanding	EU CSDDD; Modern Slavery Act review; mandatory human rights DD
AI Procurement Governance NEW 2025	MEDIUM -Watch item; policy under development	Global (technology platforms)	Risk of algorithmic deprioritisation of human rights in supplier selection; governance frameworks nascent	Algorithmic deprioritisation of human rights criteria

Criterion 4

Actions taken to assess and address risk

This section outlines the measures implemented to evaluate and mitigate the modern slavery risks highlighted in Criterion 3. Our strategy has advanced through four interconnected pillars: conducting due diligence within the supply chain, managing operational risks, enhancing training and awareness, and establishing grievance mechanisms and remediation processes. In 2025, we have focused on engaging directly with suppliers beyond platform-based assessments, creating targeted training programs specifically for healthcare environments, and further embedding modern slavery screening into frontline clinical operations.

4.1 Supply Chain Due Diligence Actions

4.1.1 Supplier Risk Management Platform - Sedex

In recent reporting periods, St Vincent's collaborated with ACAN to integrate high-risk suppliers into the Sedex platform for self-assessment and auditing. Supplier Ethical Data Exchange (Sedex) enables SMETA (Sedex Members Ethical Trade Audit) as a social audit methodology to assesses supplier facilities regarding labour standards, health and safety, environment, and business ethics and ensure responsible and ethical practices across our global

supply chain. Progress has been gradual, as many large clinical suppliers favour their own risk assessment tools, and the onboarding process requires a facility-by-facility approach, compounded by limitations in the self-assessment questionnaires (SAQ) data quality. By 2025, Sedex remains a component of a wider multi-platform strategy, with the Supplier Due Diligence Program now serving as the main method for directly engaging major clinical suppliers.

184

Suppliers invited to Sedex

171

Total suppliers joined Sedex

157

SAQs completed

15

Social audits completed

94

Corrective actions tracked

1431

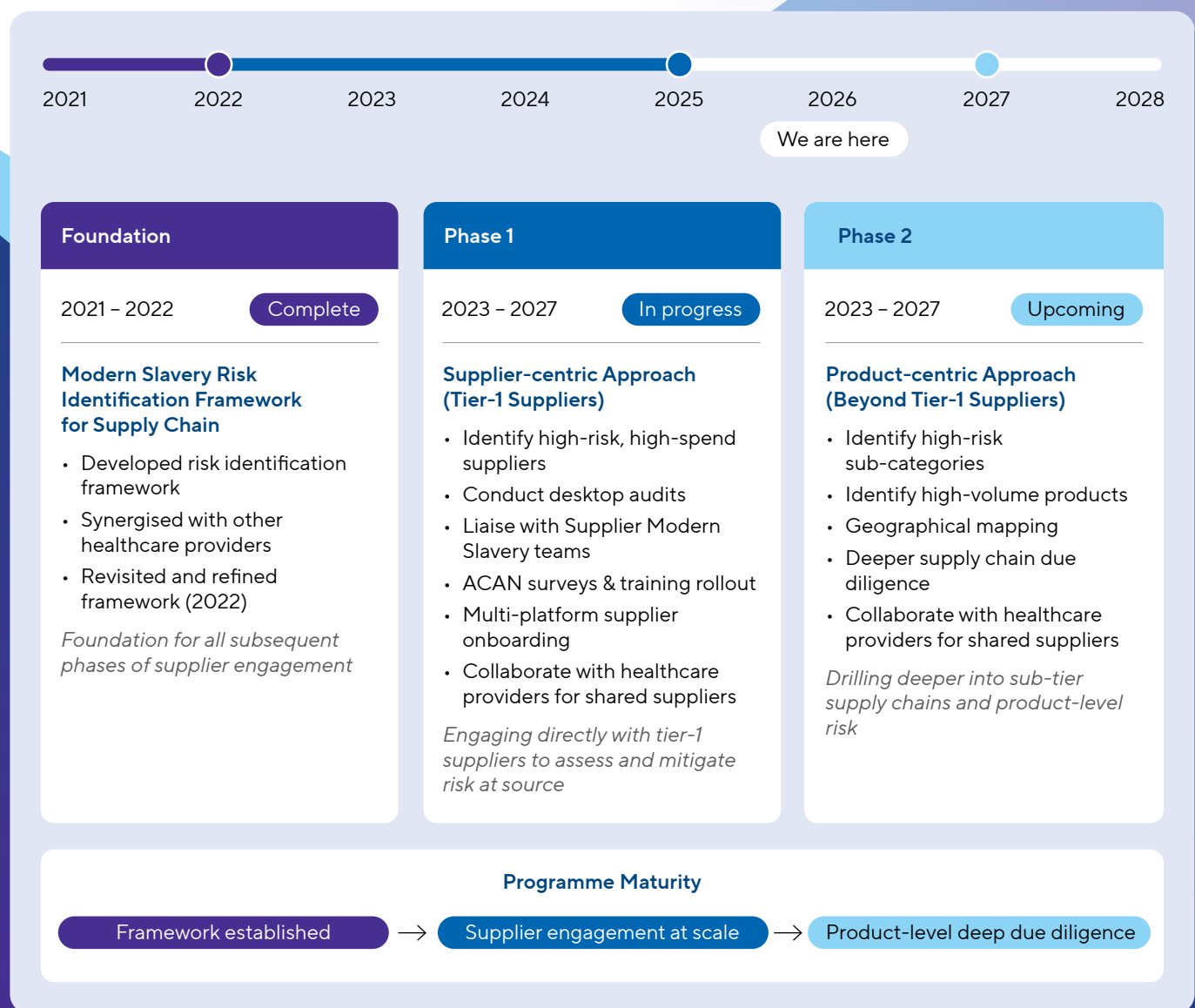
ACAN supplier surveys completed



4.1.2 Supplier Due Diligence Program

The Supplier Due Diligence Program is a pivotal element in the St Vincent's approach to mitigating supply chain risks. This program has expanded to encompass 141 Tier-1 suppliers that are both high-risk and high-expenditure, covering about 85% of the addressable spend across the 21 risk categories specified in Criterion 3. Phase 1, which is centred on Tier-1 suppliers, will continue until 2027. Phase 2, which will concentrate on products and extend its focus beyond Tier-1, is scheduled for 2026–2028.

The diagram below maps our phased approach to supplier due diligence – from the foundational risk identification framework through to the planned product-centric approach.



4.1.2 Continued

In 2025, a notable shift occurred with the introduction of direct, platform-independent conversations with suppliers' modern slavery leads, which were informed by desktop audit insights. This was in addition to the ongoing use of ACAN-driven surveys, SAQs, and Sedex for audits.

Action Taken	Impact Across St Vincent's	Spend Categories / Areas Affected	Progress Update - 2025
Supplier Due Diligence Program	Supply Chain	All 21 high-risk categories; Top 141 suppliers (~85% addressable spend)	Phase 1 progressing. Direct communication channels established with modern slavery leads at major clinical suppliers. Desktop audit database under construction. Collaborative engagement with healthcare peers.
Sedex Platform (multi-platform strategy)	Supply Chain	All high-risk supply chain categories	Continued Sedex subscription via ACAN membership. Exploring complementary platforms (Fairsupply) to improve coverage of large clinical suppliers unwilling to complete Sedex SAQs.
Supplier Surveys (ACAN facilitated)	Supply Chain	All high-risk categories	1431 supplier surveys completed (up from 476 in 2023 and 699 in 2024). Low completion rates persist among large clinical suppliers. Integrated into supplier lifecycle management: new supplier onboarding and annual compliance attestation via LinkSafe.
Procurement Practices Review	Supply Chain	All categories - supplier selection	Comprehensive tendering procedure review completed. Mandatory modern slavery criteria now embedded in supplier selection. Clinical products exempted (clinician-led selection based on patient outcomes). Exceptions documented and reviewed annually.
Contract Clauses Update	Supply Chain	All contracts - top supplier agreements	Legal Counsel overseeing systematic review and update of contract clauses. Modern slavery-specific obligations embedded in new and renewed contracts. Open Windows contract management platform centralising documentation and audit trails.
Supplier Code of Conduct	Supply Chain + Operations	All suppliers and contractors	Supplier Code of Conduct finalised. Sets minimum human rights standards for all suppliers, contractors and labour hire agencies. Distribution to supplier community scheduled for 2026. LinkSafe platform updated to require annual attestation of compliance.

4.2 Operational Risk Management Actions

4.2.1 Contingent Labour - Migrant Worker Recruitment Pipeline

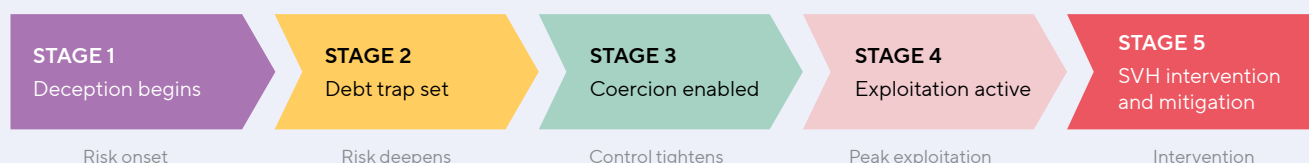
With approximately 20% of St Vincent's workforce on visas and a significant proportion originating from high-risk recruitment countries, the contingent labour recruitment pipeline remains a high-priority operational risk. Our actions in 2025 focus on closing gaps identified through the 2024 hiring manager and labour hire agency surveys.

Exploitation Risk Markers



Debt Bondage Pipeline Flow →

Risk Escalation Journey



Workers may accumulate significant debt before arriving in Australia – limiting ability to report exploitation or exit employment. St Vincent's Supplier Code of Conduct, grievance channels, and IRIS IOM standards are the primary intervention levers at Stage 5



4.2.1 Continued

Action Taken	Impact Across St Vincent's	Spend Categories / Areas Affected	Progress Update - 2025
Targeted Training - Labour Hire Agencies	Operations + Supply Chain	Contingent Labour; recruitment practices	E-learning module developed for labour hire agencies supplying St Vincent's. Module covers: identifying modern slavery risks in migrant worker recruitment; minimum standard checklists; debt bondage recognition; and obligations under the Supplier Code of Conduct. Rollout ongoing
Targeted Training - Hiring Managers	Operations	All hiring managers across St Vincent's facilities	Dedicated e-learning module for internal hiring managers covering: identifying red flags in labour hire agency practices; minimum recruitment standards; worker rights obligations; and escalation pathways. Developed with reference to IRIS IOM ethical recruitment framework.
Migrant Worker Voice Survey	Operations	Migrant workforce across St Vincent's facilities	Survey of migrant workers conducted in partnership with the Migrant Justice Institute, UNSW. Captures worker-reported experiences of recruitment practices, fee charging, visa dependency, and workplace rights awareness. Findings to inform Supplier Code of Conduct implementation and training program refinement.
Commercial Framework Review - Labour Hire	Operations + Supply Chain	Labour hire agency contracts	Review of commercial framework for labour hire agency agreements to establish minimum fair wage standards – ongoing.

4.2.2 Survivor Identification and Frontline Clinical Operations

Healthcare providers occupy a unique position in the modern slavery ecosystem: frontline clinical staff are among the few professionals with direct contact with victim-survivors. St Vincent's 2025 operational actions build on the 2024 Commonwealth Grant-funded pilot program, which identified 13 survivors across public hospitals in Melbourne and Sydney.

Action Taken	Impact Across St Vincent's	Spend Categories / Areas Affected	Progress Update - 2025
Survivor Screening – Scaled Rollout	Operations	Frontline staff, emergency departments, social work	Modern slavery screening criteria integrated into existing family and domestic violence (FDV) screening framework. Clinical referral pathways to specialist anti-slavery services established.
Clinical Advocate Network - Expansion	Operations	Public hospitals - Melbourne and Sydney; Privates	Eight additional clinical advocates recruited in 2025. Advocates are clinical staff across Emergency, Social Work, and Clinical Education departments. Provide peer support, first-response capability, and champion training within their facilities.
Data Capture - Survivor Indicators	Operations	Frontline staff; medical records	Modern slavery indicator data capture embedded in clinical records system, linked to existing screening process. Statistics reported in Criterion 5.
Peer Support Network for Frontline Staff	Operations	Clinical staff working with survivors	Staff who work with victims of severe exploitation and complex trauma face vicarious trauma risk. Peer support program integrated into existing Support Team Action Response (STAR) program. Modern slavery-specific trauma support included in STAR training curriculum. Network of peer supporters trained and active across Melbourne public hospital.

4.2.3 Investments Portfolio

St Vincent's investment portfolio has been formally incorporated into the modern slavery risk framework as a strategic risk category. Actions in 2025 focus on assessing fund manager due diligence capability.

Action Taken	Impact Across St Vincent's	Spend Categories / Areas Affected	Progress Update - 2025
Investment Manager Due Diligence Assessment	Strategic	Investment portfolio - all fund managers	Annual investment manager review now includes ongoing modern slavery due diligence. Assessing: adoption of IASTAPAC principles; human rights screening practices; ESG disclosure standards; and exposure to companies operating in high-risk sectors or geographies. Full assessment framework to be completed 2025-26.

4.3 Training, Awareness and Capacity Building

A defining feature of the 2025 program is the shift from generic enterprise-wide e-learning modules (identified as outdated and lacking health-sector application in 2024 staff surveys) to role-specific, healthcare-contextualised training. The new training suite has been developed in collaboration with ACRATH, the Office of the NSW Anti-Slavery Commissioner, and the University of Notre Dame, using a co-design approach that incorporates lived experience and clinical expertise.

Action Taken	Impact Across St Vincent's	Spend Categories / Areas Affected	Progress Update - 2025
Foundational Module - All Staff	Operations + Supply Chain	All St Vincent's employees and volunteers	One foundational e-learning module covering: what modern slavery is and how it manifests in healthcare settings and supply chains, which replaces outdated enterprise-wide module. Available via Workday LMS.
Clinical Staff Modules (five modules)	Operations	All clinical staff including nurses, medical officers, social workers, allied health	Five modules using simulated case studies: recognising exploitation indicators; trauma-informed response; referral pathways; and data capture.
Hiring Manager Module	Operations	All managers involved in staff recruitment	One module covering: modern slavery risks in migrant worker recruitment; identifying red flags in labour hire agency practices; minimum standard obligations; and escalation procedures. Informed by 2024 hiring manager survey findings.
Labour Hire Agency Module	Operations + Supply Chain	All active labour hire agencies	One module plus compliance checklist covering: ethical recruitment standards; debt bondage and recruitment fee prohibition; worker rights; and Supplier Code of Conduct obligations. Aligned with IRIS IOM ethical recruitment framework.
Community of Practice Sessions	Operations	Clinical and operational staff	Monthly Modern Slavery Community of Practice sessions continued in 2025.
Resource Hub	Supply Chain + Operations	All staff	Centralised modern slavery resource hub launched on St Vincent's intranet. Contains: all training modules; policy documents; referral pathway guides; supplier engagement tools; and annual Modern Slavery Statement. Accessible to all employees across all facilities.
Supplier Capacity Building	Supply Chain	All suppliers and their staff	ACAN facilitated sessions for supplier staff to attend modern slavery training and raising awareness of modern slavery risks within suppliers.

4.4 Policy, Governance and Contracts

Action Taken	Impact Across St Vincent's	Spend Categories / Areas Affected	Progress Update - 2025
Modern Slavery Policy Review	Supply Chain + Operations	All staff, suppliers, contractors	Comprehensive review completed benchmarking against local and international best practices.
Whistleblower Policy Review	Operations	All staff, contractors, volunteers	Reviewed and updated. Enhanced to improve accessibility for staff.
Right to work approval and Visa Policy Review	Operations	All employees on visas	Updated to integrate with modern slavery obligations for all staff on visas.
Supplier Code of Conduct Finalised	Supply Chain	All suppliers, contractors, labour hire agencies	Sets minimum human rights standards covering: no recruitment fees; no passport retention; fair wages; freedom of movement; right to terminate employment; and access to grievance mechanisms. Distributed to all active suppliers. Required attestation via LinkSafe annual compliance process.
LinkSafe Supplier Management Platform	Supply Chain	All suppliers - onboarding and annual renewal	ACAN Modern Slavery Survey embedded in new supplier onboarding process. Annual compliance attestation (including Supplier Code of Conduct sign-off) required from existing suppliers. Automated screening integrated into supplier lifecycle management.

4.5 Grievance Mechanisms and Remediation

St Vincent's is committed to providing timely and effective remedy to people impacted by modern slavery in accordance with the UN Guiding Principles on Business and Human Rights, the Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities, and relevant Australian laws. In 2025, a key focus has been improving the accessibility and awareness of grievance channels, particularly among migrant workers, contract staff, and supplier workforces who have been identified as having the lowest awareness of available reporting pathways.

Action Taken	Impact Across St Vincent's	Spend Categories / Areas Affected	Progress Update - 2025
Anti-Slavery Referral Pathway	Operations	Survivor referrals from public hospitals	Formal referral pathways established with: Red Cross Support for Trafficked People, Additional Referral Pathway, other community support service organisations and Life Without Barriers. Pathways documented in clinical protocols and available via resource hub.
FairCall - Whistleblower Hotline	Operations + Supply Chain	All staff, contractors, suppliers, volunteers	FairCall provides secure, independently monitored anonymous reporting channel for concerns including modern slavery.
Ethos - Structured Speak-Up Program	Operations	All clinical and operational staff	Ethos graded assertiveness program (CUSS framework: Curious, Unsure, Seriously Concerned, Stop) used for staff to raise patient safety and workplace concerns including modern slavery indicators. Integrated into clinical induction and refreshed training.
Grievance Resolution Policy Updated	Supply Chain + Operations	All staff, suppliers, contractors	Grievance Resolution Policy updated to align with revised Modern Slavery Policy and Supplier Code of Conduct. Outlines process for receiving, investigating, and resolving modern slavery-related grievances from employees, contractors, suppliers, service providers, and volunteers.
Awareness Campaign Grievance Channels	Operations	All staff, with priority on migrant and contract workers	Partnership with the St Vincent's People & Culture department to address systemic low awareness confirmed in 2024 staff surveys. Campaign uses multiple channels: intranet resource hub; team briefings; new staff induction; and supplier communication templates. Metrics on awareness improvement to be reported in 2026 statement.

4.6 External Partnerships and Collaboration

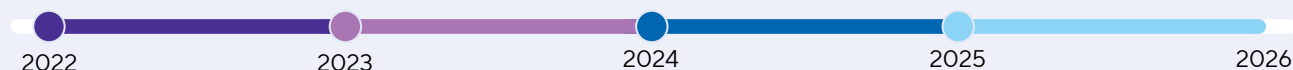
The St Vincent's modern slavery program is embedded in a network of strategic partnerships that amplify impact, avoid duplication of effort, and connect the organisation to leading practice intelligence. The following table summarises active partnership activities in 2025.

Action Taken	Impact Across St Vincent's	Spend Categories / Areas Affected	Progress Update - 2025
ACAN - Collaboration with Catholic peers	Supply Chain	Supply chain due diligence across shared suppliers	Shared supplier due diligence, shared desktop audit findings, and common SAQ tools disseminated via Sedex.
ACRATH - Clinical Protocol Development	Operations	Survivor screening; clinical training	Partnership with Australian Catholic Religious Against Trafficking in Humans for clinical pathway design, training co-development, and survivor screening protocol review.
Office of the NSW Anti-slavery Commissioner	Operations	Frontline staff training; Community of Purpose	MoU in place. Member of the 'It's Healthy to Fight Modern Slavery' Community of Purpose initiative. Collaborating on training content co-creation using lived-experience practitioners. Resources and knowledge exchange in both directions.
Australian Federal Police - Human Trafficking Team	Operations	Staff training; awareness raising	Strategic partnership for raising awareness on frontline trainings and modern slavery indicators from public health perspective.
University of Notre Dame - Training Development	Operations	Healthcare-specific learning module design	Alliance formed in 2024-25 to develop healthcare-specific modern slavery learning modules. Provides academic rigour and pedagogical design capability for the new e-learning suite.
Migrant Justice Institute, UNSW	Operations	Migrant worker surveys	Partnership for 2024-25 migrant worker survey design and implementation. Institute provides expertise in ethical research with vulnerable worker populations, ensuring survey design does not create risk of harm to respondents.
Attorney General's Department - National Action Plan to Combat Modern Slavery Round 2 (2023-2025)	Operations	Survivor screening; migrant worker recruitment	Active grant-funded project covering: (1) survivor screening and frontline clinical training; and (2) migrant worker recruitment risk and training for labour hire agencies. Annual progress report submitted to Attorney-General's Department. Final outcomes report due 2026.



Assessing effectiveness

In our earlier statement, we described the ongoing learning framework that has been woven into our current comprehension of the intricacies and obstacles in tackling modern slavery, with the goal of creating a framework to evaluate its effectiveness. This framework has been consistently applied to determine which insights can be utilised by the organisation. Additionally, when certain elements fall short of expectations, we pinpoint deficiencies and investigate methods to improve and modify our approach to these challenges.



2022-23

3rd statement: Foundations

- Conducted foundational due diligence across high-risk supply chain categories
- Initiated onboarding onto the Sedex platform for supplier risk monitoring
- Rolled out the Anti-Modern Slavery Policy across the organisation
- Integrated modern slavery e-learning modules into the Workday platform

Focus: policy foundations, platform enablement, and workforce awareness

2023

4th statement: Programme launch

- Commenced the Supplier Due Diligence Program; identified 122 high-risk suppliers
- Secured a Commonwealth Government grant to support programme development
- Began designing a targeted modern slavery training program
- Formalised a Memorandum of Understanding with the NSW Anti-Slavery Commissioner
- Established a formal partnership with ACRATH

Focus: supplier identification, external partnerships, and programme infrastructure

2024

5th statement: Scale and evidence

- Implemented staff surveys to assess modern slavery awareness and gaps
- Launched a pilot programme for survivor screening in clinical settings
- Expanded the Supplier Due Diligence Program to encompass 141 suppliers
- Commenced desktop audits for high-risk suppliers
- Initiated a comprehensive policy review process

Focus: evidence gathering, supplier auditing, and clinical screening

2025

6th statement: Embed and expand

- Introduced targeted e-learning modules and a centralised resource hub
- Appointed clinical advocates across hospitals to strengthen survivor identification
- Completed updates to the Modern Slavery Policy and Supplier Code of Conduct
- Commenced recruitment pathway training for labour hire agencies
- Expanded survivor screening efforts and adopted multi-platform supplier monitoring

Focus: clinical integration, policy consolidation, and supplier monitoring maturity

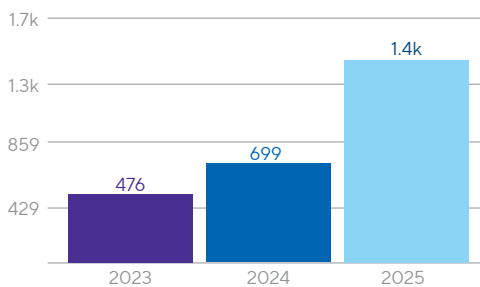
Supplier Engagement Outcome

Below we provide a foundational assessment of supplier engagement, transparency, and modern slavery risk management. It helps identify key trends, areas requiring further attention, and opportunities for strengthened due diligence. The data points included reflect both supplier visibility and compliance activities.

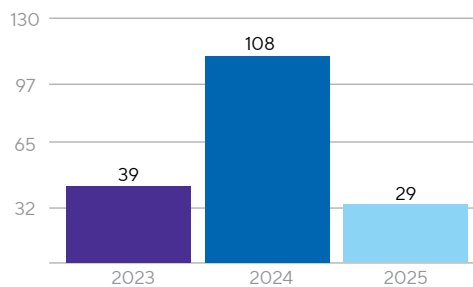
ACAN Facilitated Surveys and Trainings

The table and bar chart below show the number of supplier surveys completed and supplier staff attending trainings, as facilitated through ACAN, for 2023, 2024, and 2025

Supplier Surveys Completed



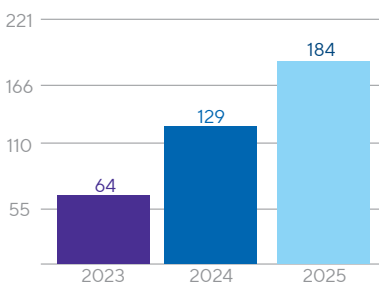
Supplier Staff Attending Training



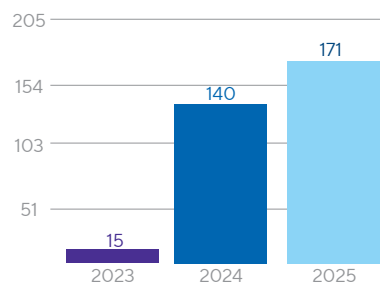
Metric	2023	2024	2025	2023-24	2024-25	3-year
Supplier surveys completed	476	699	1431	↑ +47%	↑ +105%	↑ +201%
Supplier attending training	39	108	29	↑ +177%	Targeted delivery	↑ ongoing

Survey volume more than doubled in 2025. Staff training shifted a targeted role-specific model in existing workflows.

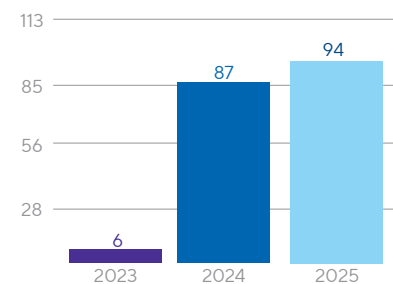
Supplier Invited on Sedex



Suppliers Joined Sedex & SAQs Completed



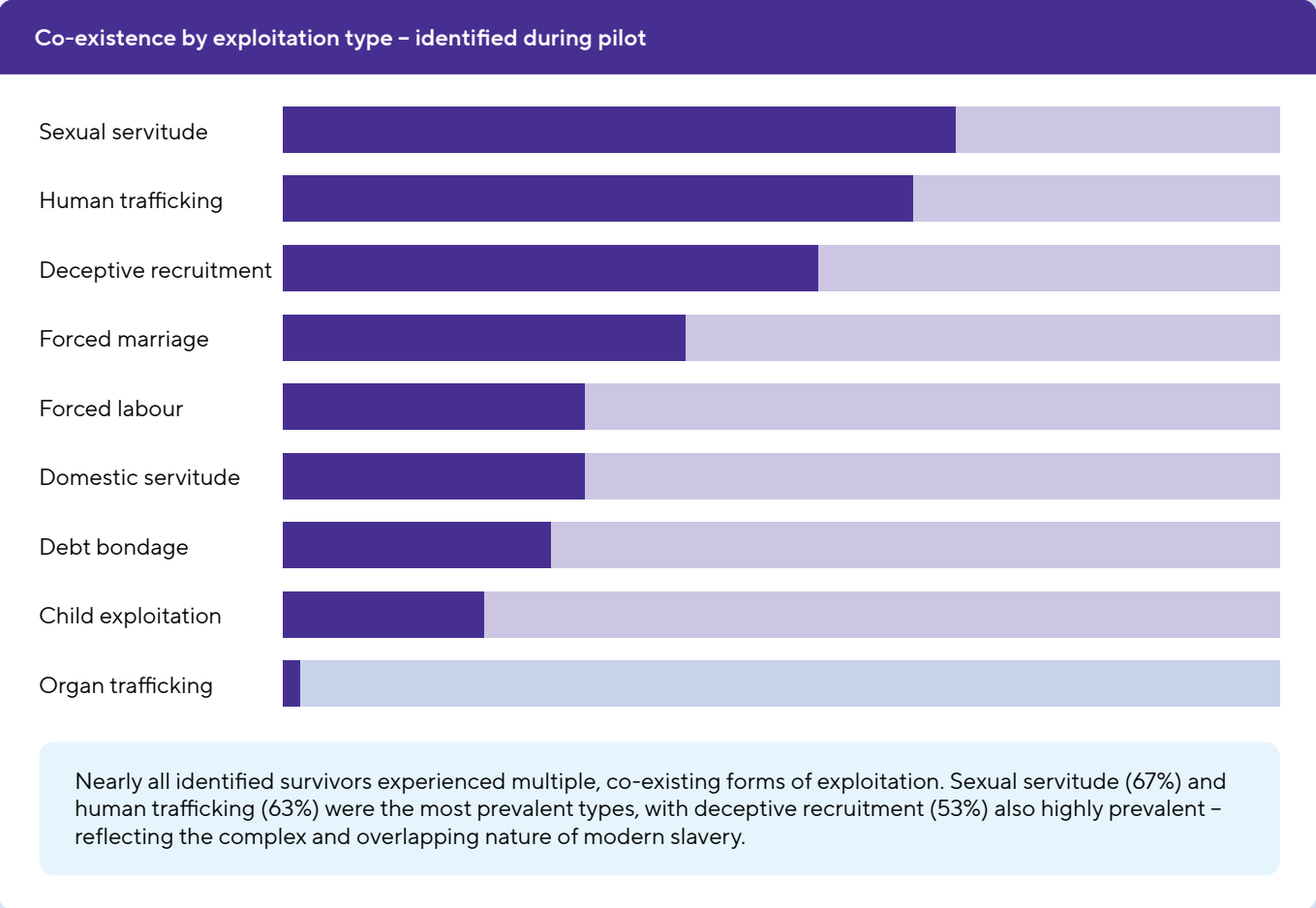
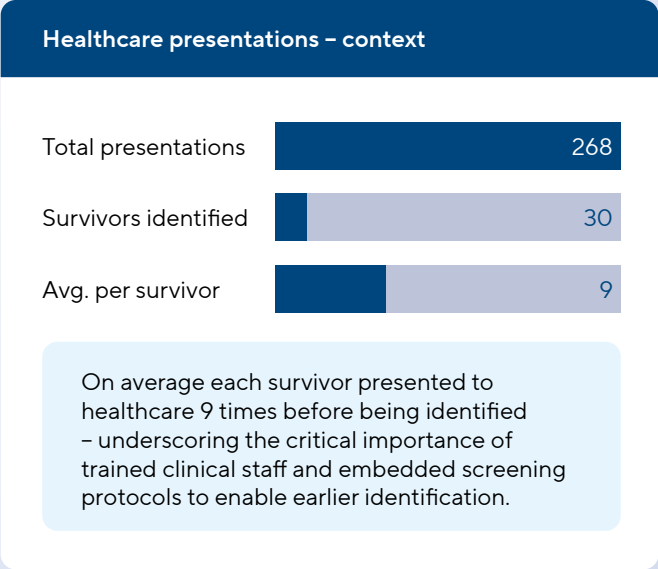
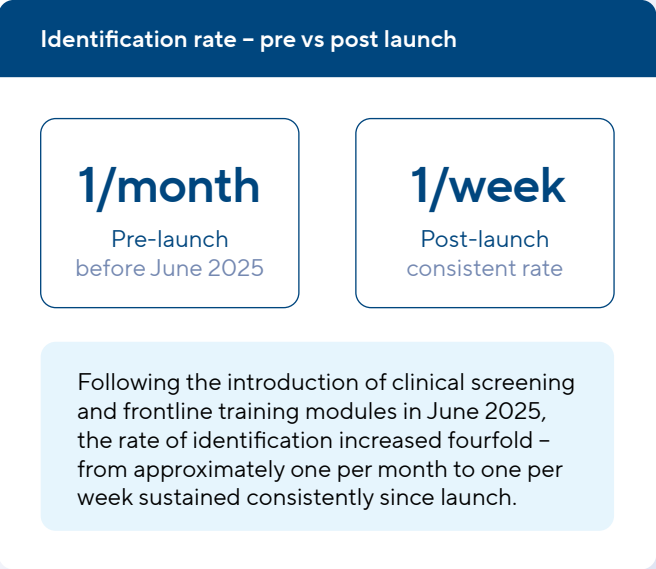
Sedex Audit Activity



Metric	2023	2024	2025	2023-24	2024-25	3-year
Supplier surveys completed	64	129	184	↑ +102%	↑ +43%	↑ +188%
Supplier attending training	15	140	171	↑ +833%	↑ +22%	↑ +1040%
SAQ completed	20	106	157	↑ +430%	↑ +48%	↑ +685%
Social audits	12	19	15	↑ +58%	consolidated	↑ +25%
Corrective actions identified	6	87	94	↑ deeper scrutiny	↑ sustained	↑ +1467%

Growth in corrective actions reflects deeper audit scrutiny. Social audits consolidated to prioritise highest-risk suppliers.

Patients-Survivors Screening (Nov 24-Jan 26)



Outcome of effectiveness assessment

During the previous reporting period, we implemented four pillars as a standardised framework to assess the success of our initiatives.

Pillar 1 – Governance and Compliance

- Defines the core structure and policies that steer our initiatives, stressing the significance of accountability and well-defined duties.
- Reviews the comprehensive strategies and efforts to address and mitigate the overall risks of modern slavery.

Pillar 2 – Operations

- Focuses on internal practices and how effectively we manage risks within our day-to-day activities.

Pillar 3 – Supply Chain

- Examines our external partnerships, including supplier engagement and the mechanisms in place to assess and mitigate risks within supply chain.

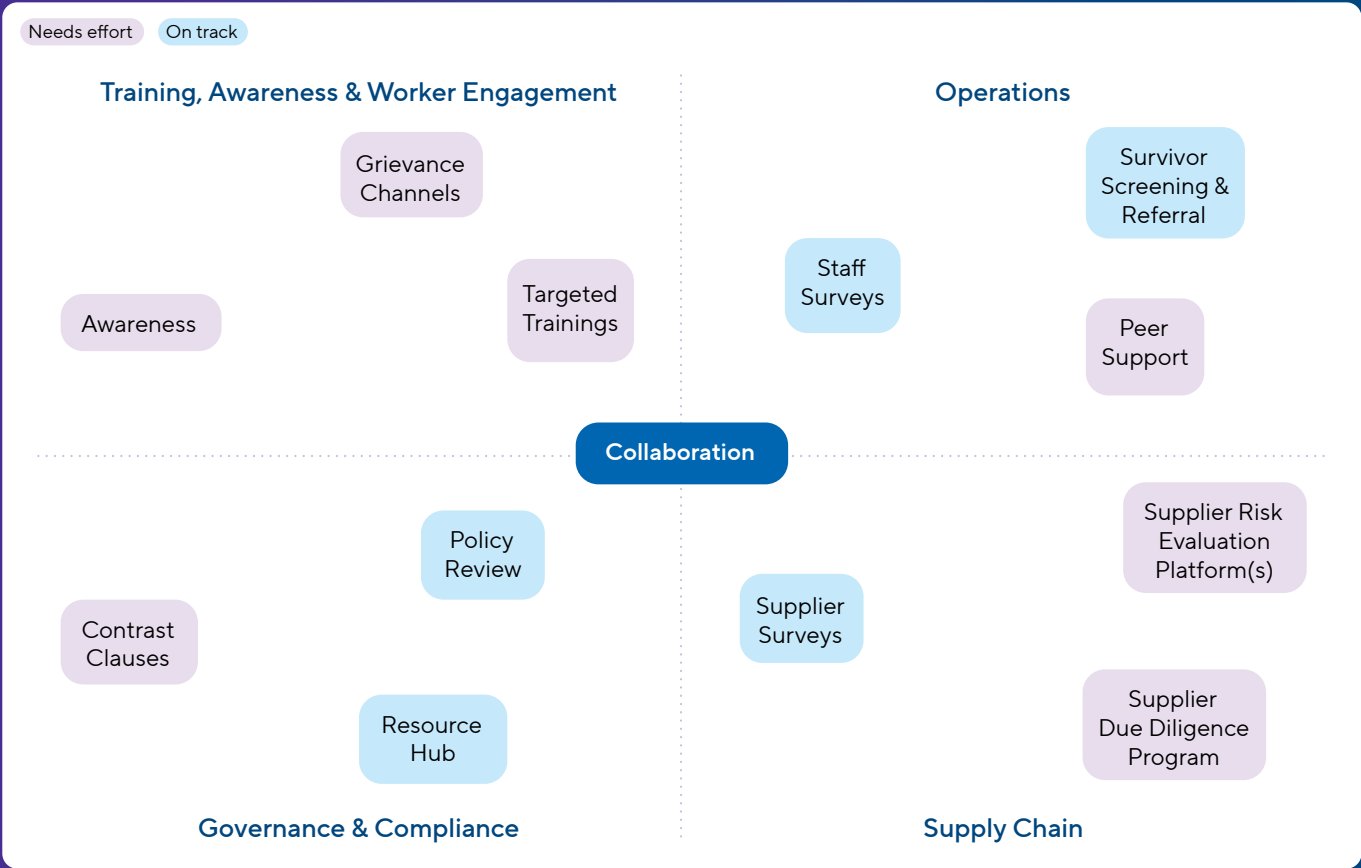
Pillar 4 – Training, Awareness and Worker Engagement

- Addresses how we manage worker engagement and the standards upheld to prevent exploitation.

Overall Progress Evaluation

We employ a traffic light system to manage various activities across these 4 pillars, offering a clear visual representation of their status and enabling swift identification of areas needing attention.

Reflecting on our position from three years ago, we have significantly enhanced our understanding of the risks inherent in our supply chain and operations. Nonetheless, we continue to encounter obstacles in effectively mitigating these risks due to various limitations beyond our direct control necessitating continued collaboration and advocacy with external agencies and stakeholders exercising our influence within the broader healthcare and anti-slavery sector.



Criterion 6

Process of consultation with entities owned or controlled

Consultation as between the parent company of St Vincent's Health Australia Ltd and its subsidiaries and affiliates in the preparation of this statement has taken place via the Board and ELT (as described in Criterion 2), the Group Procurement team, as well as the Board's Mission Ethics and Advocacy Committee, the Audit and Risk Committee, and the Anti-Modern Slavery Working Groups which comprise staff representing different group entities, facilities and group functions.

Considering these structures, St Vincent's considers it is reasonable and appropriate for the parent company to provide this joint statement on behalf of all reporting entities in the group, including a consolidated description of their actions to address modern slavery risks.

Criterion 7

Any other relevant information

We have consistently worked to raise awareness about collaborative opportunities within the healthcare sector to combat modern slavery. Our efforts include:

- Participating in the Commonwealth-funded grant project under the National Action Plan to Combat Modern Slavery (Round 2, 2023-2025), which focuses on screening survivors who present at healthcare facilities and addressing risks in the recruitment process for migrant workers in healthcare.
- Member of the Community of Purpose initiative, "It's Healthy to Fight Modern Slavery", led by the Office of the NSW Anti-slavery Commissioner, which emphasises the crucial role frontline healthcare workers play in identifying and assisting individuals at risk of or experiencing modern slavery.
- Strategic partnership with the Australian Federal Police for raising awareness amongst frontline workers about the intersection of modern slavery as a public health issue.

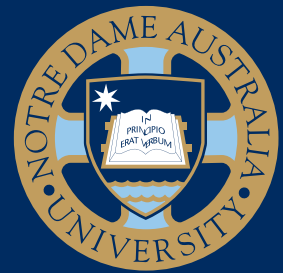
Better and
fairer care.
Always.



ST VINCENT'S
Better and fairer care. Always.

UNDER THE STEWARDSHIP OF MARY AIKENHEAD MINISTRIES

svha.org.au



The University of Notre Dame Australia

2025 Modern Slavery Statement

ABN 69 330 643 210



Acknowledgement of Country

The University of Notre Dame Australia respectfully acknowledges the traditional custodians of the lands on which our campuses are located. We pay homage to the Elders, past, present and emerging, of the Whadjuk Noongar people in Fremantle, the Yawuru people in Broome and the Gadigal people of the Eora Nation in Sydney. These lands were meeting places of teaching, learning and research for many Indigenous nations and we are committed to honouring their rich histories and cultures. As an educational institution, we recognise the importance of these lands for Indigenous peoples and acknowledge their enduring connection to country, community and culture across Australia. We pledge to continue building relationships that respect and celebrate the knowledge and values of Indigenous peoples and communities.

Content warning

This statement addresses the subject of modern slavery, which could trigger sadness, distress or traumatic memories, especially for individuals who have personally experienced or are closely associated with victim survivors. If you need to discuss any concerns or if you or someone you know is in danger or feels unsafe, support services include:

- Lifeline (24/7): 13 11 14 for confidential telephone crisis support.
- Mental Health Line (NSW, 24/7): 1800 011 511 for advice and referrals from mental health professionals.
- Mental Health Emergency Response Line (WA): 1300 555 788

To share any concerns about modern slavery activities connected to Notre Dame, please use our Modern Slavery Feedback Form, or reach out directly to our specialised modern slavery team at modernslavery@nd.edu.au.

If you are experiencing coercion, threats, deception or violence in your workplace or residence, this may constitute modern slavery, which is strictly illegal in Australia. For free and confidential assistance about support and services, please contact Domus 8.7, an independent community organisation for confidential advice and support on 02 9307 8464.

University Student Counselling Services:
notredame.edu.au/students/support/health-safety-and-wellbeing/counselling.

If you or anyone else is in immediate danger or feels unsafe, please contact emergency services by dialling 000.

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Introduction

At the University of Notre Dame Australia, we are committed to upholding the highest standards of ethical conduct, integrity and social responsibility in all aspects of our operations. As a Catholic institution, our mission extends beyond academic excellence to fostering a culture that respects human dignity, promotes justice and ensures the wellbeing of all individuals connected to our university – whether they are students, staff, suppliers or broader community stakeholders.

Modern slavery refers to situations where individuals are exploited and cannot refuse or leave due to threats, violence, coercion, deception or abuse of power. It includes forced labour, human trafficking, debt bondage, servitude, forced marriage and the worst forms of child labour, as defined under the Commonwealth Modern Slavery Act 2018.

Modern slavery is a significant global issue that affects millions of people, often hidden within complex supply chains and employment practices. As an organisation that engages with a diverse network of suppliers, service providers and industry partners, we recognise our responsibility to identify and address potential risks of modern slavery within our operations and procurement activities.

This Modern Slavery Statement outlines the actions we have taken in 2025 to assess, mitigate and prevent modern slavery risks, demonstrating our ongoing commitment to transparency and continuous improvement. It details the structures, policies and frameworks we have implemented to ensure compliance with ethical procurement standards and legislative obligations. Additionally, it highlights our collaborative efforts with partners such as the Australian Catholic Anti-Slavery Network (ACAN) and the Australian Universities Procurement Network (AUPN), as well as the initiatives we have undertaken to strengthen supplier accountability and workforce protections.

At Notre Dame, education is a powerful tool for social change. Through our teaching, research and advocacy efforts, we seek to equip future leaders with the knowledge and ethical framework necessary to combat exploitation and create a fairer, more just world. By embedding modern slavery awareness into our governance, procurement and academic strategies, we reaffirm our dedication to human rights and our commitment to making a meaningful impact.

This statement reflects our continued efforts to build a responsible and ethical university environment – onewhere dignity, fairness and respect remain at the heart of everything we do.





Professor Francis Campbell



Paul McClintock AO

Approval and signature from the Vice Chancellor and Chancellor

The University of Notre Dame Australia upholds a strong commitment to ethical integrity, including actively combatting modern slavery risks across its operations and supply chains. Guided by its mission, and at the heart of Catholic values and teachings, Notre Dame tolerates no form of exploitation and embraces its social responsibility to pursue justice, grounded in the dignity of every human being.

Modern slavery remains a complex and evolving global challenge that is often embedded within systems and supply chains. Given the breadth of the University's supplier and partner relationships, careful oversight of operations and procurement activities is essential to identifying and addressing areas of potential risk.

Throughout 2025, Notre Dame continued to take steps towards enhancing ethical procurement practices, aligning with evolving sustainability standards and promoting greater transparency across supply chains. This work is supported by the sustained collaboration with sector partners, including the Australian Catholic Anti-Slavery Network and the Australian Universities Procurement Network, which allows the University to draw on shared expertise, resources and insights.

Notre Dame has advanced a more data-driven approach to risk management in the procurement landscape. Enhanced supplier screening, improved supply chain visibility and targeted engagement with suppliers have strengthened oversight and accountability. Progress has been made in further integrating principles of sustainability and ethics into procurement practices, recognising the relationship between environmental, social and governance factors and modern slavery.

Education remains central to Notre Dame's response to modern slavery. The University continues to equip students, staff and the broader community with the knowledge and ethical awareness needed to address modern slavery and human trafficking. This includes academic offerings across undergraduate and postgraduate programs, alongside a focus on ethics and social justice within the curriculum.

Meaningful progress in the fight against modern slavery and human trafficking was made in 2025, but we acknowledge that this work is ongoing and Notre Dame's resolute dedication to the protection of human rights remains. We have committed to future actions including an intensive micro credential course on preventing and responding to modern slavery and human trafficking, further refinement of supply chain risk profiling and the launch of a new modern slavery learning module for staff.

Addressing modern slavery requires a sustained effort, continued collaboration and improvement. Notre Dame will always work on strengthening its approach in this space and contributing to a future where dignity, fairness and respect for all are upheld across all areas of its operations and influence.

This modern slavery statement is signed by a responsible member of the University of Notre Dame as defined by the *Commonwealth Modern Slavery Act 2018*.



Professor Francis Campbell
Vice Chancellor
25th June 2026



Paul McClintock AO
Chancellor
25th June 2026



CRITERION 1

About us

The University of Notre Dame Australia is a distinguished national Catholic university that spans the Australian continent, from the west coast city of Fremantle, through the town of Broome in the northwest, to the heart of Sydney on the east coast. As the pioneer Catholic university in Australia, Notre Dame is committed to delivering an unparalleled educational experience, characterised by a commitment to excellence and a deeply rooted belief in enabling each member of our community to achieve their full potential.

We proudly uphold a legacy of 2,000 years of Catholic intellectual tradition, fostering an environment of open, rigorous enquiry and vibrant discourse. This inclusive tradition welcomes individuals from all faiths and backgrounds, encouraging a rich tapestry of perspectives within our academic community.

With a student body exceeding 12,000 across our three campuses, Notre Dame offers an extensive portfolio of undergraduate and postgraduate programs. Our programs are designed to not only impart knowledge but also to cultivate critical thinking, ethical reasoning and a commitment to social justice.

In 2025, the University reported an annual revenue of approximately **\$287 million**, reflecting the scale and scope of our operations across teaching, research and community engagement.

The Objects of the University

These objects are outlined in the University of Notre Dame Australia Act 1989 (WA), which established Notre Dame and define our core mission and values.

The objects of the University are —

- (a) the provision of university education, within a context of Catholic faith and values; and
- (b) the provision of an excellent standard of —
 - (i) teaching, scholarship and research;**
 - (ii) training for the professions; and**
 - (iii) pastoral care for its students.**

Our objects have guided our growth and development from a small but enthusiastic intake of just 50 postgraduate education students on our Fremantle Campus in 1992 to today's vibrant community of around 12,000 students across all campuses.

CRITERION 2

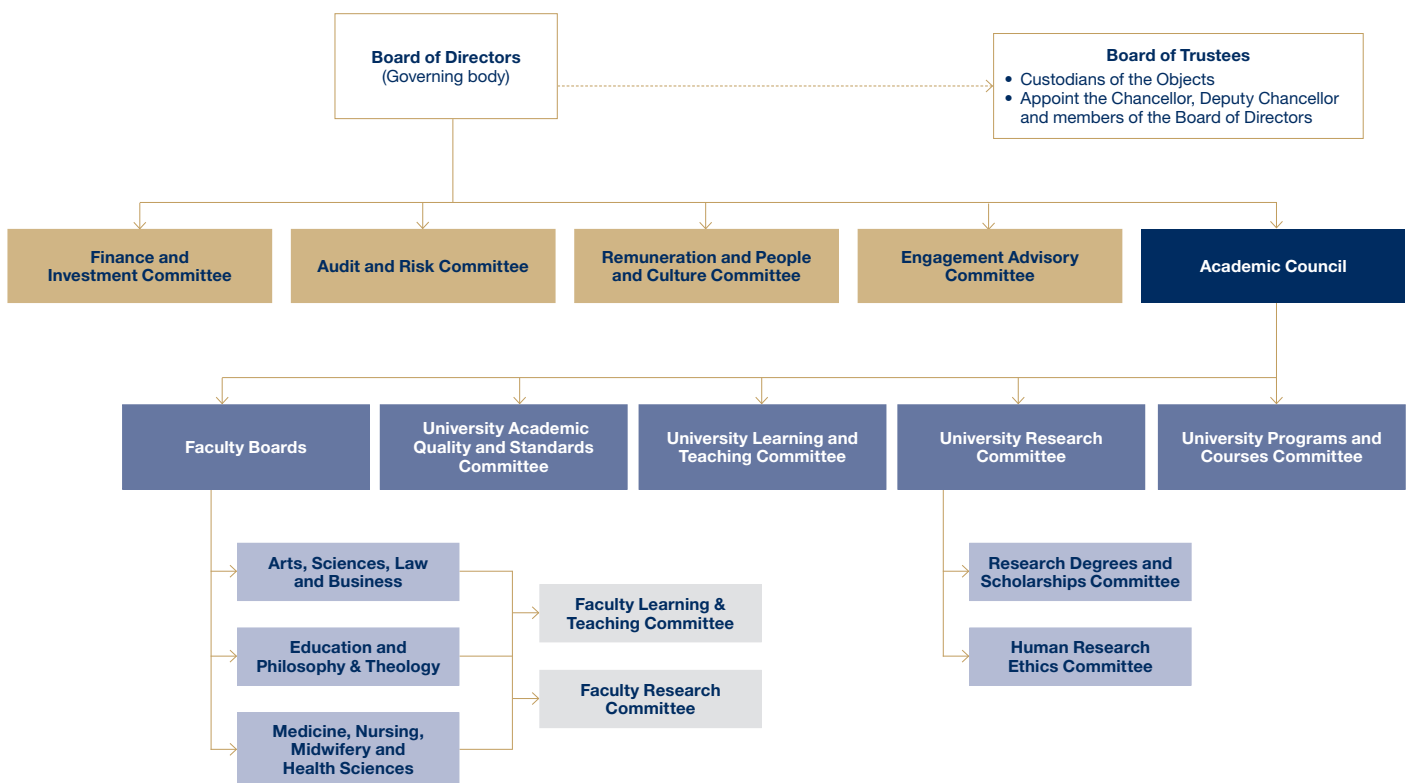
Structure, operations and supply chains

Governance and organisational structure

The University of Notre Dame Australia operates under a robust governance framework established by its Act of Parliament and Statutes, outlining the roles and functions of its Trustees, Board of Directors, Board of Governors and Principal Officers.

As the governing body, the Board of Directors oversees the University's management, ensuring adherence to our mission and values across all operations.

Figure 1 Organisational Chart of Committees



Our Strategic Plan

Notre Dame's 2022–26 Strategic Plan underscores our dedication to addressing modern slavery risks, guided by five strategic pillars: Universality, Educating for the Common Good, Integrating Practice and Knowledge, Transformative Research and Integral Human Development. This strategic approach embeds modern slavery awareness within our core missions, reflecting our commitment to ethical practices and social justice. Through education, research and community engagement, we aim to equip our students and staff with the knowledge and tools needed to address modern slavery, fostering a culture of dignity and respect for all individuals.

Operations

Notre Dame stands as a prominent national Catholic university nationally recognised for its extensive array of undergraduate, postgraduate and vocational education and training (VET) offerings. Spanning three campuses in Fremantle, Broome and Sydney, alongside seven clinical schools throughout New South Wales and Victoria, Notre Dame is committed to impactful scholarship and research that contributes positively to communities locally, nationally and globally. These efforts are supported by varied contractual relationships with suppliers to secure the goods and services essential for our educational and operational needs.

Our procurement practices, whether for ongoing service contracts or one-off purchases, are integral to maintaining the high standard of education and support services Notre Dame is known for.

Notre Dame prides itself on strong connections with industry, especially in fields such as business, allied health and nursing, education, law, medicine and architecture. These partnerships are pivotal, offering students practical placements that are relevant to their studies and enhancing their readiness for professional careers.

The University's global partnerships afford students the enriching experience of studying abroad, further broadening their academic and cultural horizons.

This collaborative approach, combined with Notre Dame's economic and social contributions, is illustrated by its significant impact on the communities it serves. In Fremantle, the education provided by Notre Dame generates substantial economic benefits for the local economy, exemplifying the University's commitment to fostering educational excellence and societal improvement.

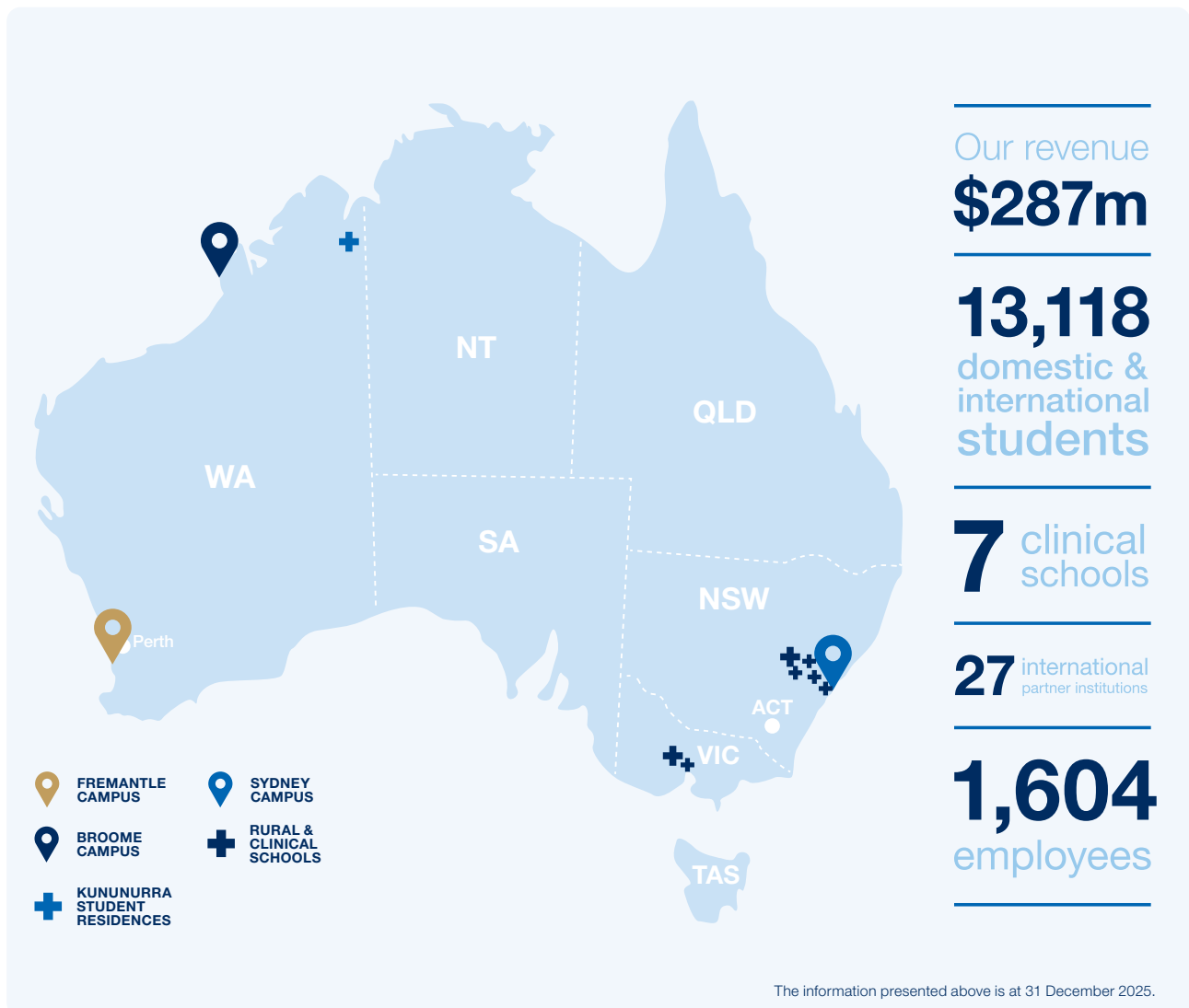


Figure 2 Notre Dame at a glance

Workforce profile

In 2025, Notre Dame employed 1,604 direct staff across academic, administrative and support roles, reflecting our commitment to providing high quality education and support services. Additionally, we engaged 96 labour hire contractors and indirect employees to complement our workforce, ensuring operational efficiency and flexibility.

Policies and procedures

To support our governance and operational standards, Notre Dame has established a suite of policies and procedures that guide ethical behaviour including, but not limited to:

- Academic Integrity Policy
- Conflict of Interest Policy
- Critical Incident Management Policy
- Discrimination, Harassment, Bullying and Sexual and Gender-Based Violence Policy
- Employee Code of Conduct & Ethical Behaviour
- Equal Opportunity Policy
- Ethics Approval for Research Policy
- Health, Safety and Wellbeing Policy
- Privacy Policy
- Procurement Policy
- Protecting Children Policy
- Research Code of Conduct
- Risk Management Policy
- Sexual Assault and Sexual Harassment Policy
- Staff Grievance Resolution Policy
- Supplier Code of Conduct
- Travel Policy
- Work, Health and Safety Policy
- Workplace Bullying Policy
- Whistleblower Protection Policy

These policies are crucial for maintaining our commitment to high standards of governance, compliance and ethical behaviour, ensuring a positive and safe environment for all members of the Notre Dame community.

Modern Slavery Working Group

The Modern Slavery Working Group was established in 2020 and plays a central role in leading the University's response to modern slavery risks. The group is accountable to the Vice Chancellor and includes representatives from Procurement, Legal, Information Technology, Campus Services, Governance, and People and Culture.

The full working group meets every eight weeks, with smaller focus groups – Governance, Supplier and Education – meeting in the alternating eight-week intervals. Together, the group is responsible for coordinating risk assessments, reviewing supplier engagement activities, refining internal procedures and ensuring that Notre Dame's modern slavery obligations are met and continuously strengthened across the institution.



CRITERION 3

Modern slavery risks

Notre Dame is firmly committed to identifying, assessing and mitigating modern slavery risks across our institution and supply chain. Our commitment is reinforced through robust governance frameworks, policies and active compliance measures, ensuring that we uphold ethical, transparent and responsible procurement practices.

To strengthen our efforts against modern slavery, we have enhanced supplier due diligence and implemented proactive compliance mechanisms. The Supplier Code of Conduct mandates all suppliers to meet minimum ethical standards related to:

- human rights and labour standards
- environmental sustainability
- fair wages and workplace safety
- anti-corruption and bribery.

These mandatory requirements ensure that modern slavery risks are not only identified but also addressed through contractual obligations, audits and compliance reporting.

ACAN Category Risk Taxonomy

Our modern slavery risks are informed by the ACAN Category Risk Taxonomy, a classification standard that identifies severity of actual or potential harm to people (saliency) in spend categories.

The ACAN Category Risk Taxonomy is based on sources such as:

- the Global Slavery Index
- the International Labor Organisation (ILO), including definitions of modern slavery
- the Bureau of International Labor Affairs (ILAB), U.S Department of Labor
- the Global Child Forum and UNICEF

Four key factors are also used to determine the level of risk:

- **Geography:** the country or location where a good is made or service is delivered
- **Industry:** the sector in which the making of goods or delivery of service occurred
- **Commodity:** the raw materials or components that comprise the goods or products
- **Workforce vulnerability:** such as bonded visas, temporary migrants, women or children known to be employed in specific industry sectors
- **Domus 8.7:** trends, cases and risk intelligence identified through the Domus 8.7 remediation service, including grievances and remediation insights relevant to category and risk to workers.

Operational and supply chain risks

The University of Notre Dame Australia recognises that modern slavery risks remain inherent within its operations and supply chains, particularly where there is reliance on external suppliers, labour-intensive services and complex or multi-tiered procurement arrangements.

In 2025, key risk areas included:

- high-risk procurement categories, including construction, cleaning, security, facilities management and information and communications technology (ICT) hardware supply chains, which involve labour-intensive activities and potentially vulnerable workforces
- third-party labour and subcontracting models, where reduced visibility over employment conditions increases exposure to underpayment, excessive working hours and non-compliance with workplace laws
- limited visibility beyond Tier 1 suppliers, particularly in offshore supply chains, restricting the ability to identify risks in deeper supplier tiers
- global supply chain disruption and economic pressures, which may drive cost-cutting behaviours and increase the likelihood of exploitative labour practices
- inconsistent supplier governance and compliance maturity, resulting in variable labour standards across the supplier base
- outsourced service delivery models, particularly those involving layered subcontracting, which may increase risks such as wage exploitation and poor working conditions
- heightened regulatory and sector expectations, increasing exposure where practices may not fully align with evolving legislative and ethical standards.

Notre Dame acknowledges that these risks are dynamic and may evolve in response to changes in its operating environment and supply chain.

Our suppliers and expenditure

In 2025, Notre Dame engaged with **1,508 suppliers**, with **466 suppliers operating within high-risk procurement categories** as defined by ACAN's taxonomy.

Supplier screening and risk profiling conducted in 2025 identified a **concentration of risk exposure across high and moderate categories**, with screening results indicating **40.91% of assessed suppliers classified as high risk and 15.91% as moderate risk**.

Further insights from supplier engagement activities highlight that a significant proportion of suppliers utilise **casual labour (39.06% of suppliers) and subcontracting arrangements (20.83% of suppliers)**, reinforcing the University's exposure to labour-related risks within its supply chain.

METRIC	VALUE
Total suppliers	1,508
Suppliers in high-risk categories	466
ACAN supplier surveys completed (total)	227
ACAN supplier surveys completed (2025)	107
Suppliers identified for Sedex onboarding	72
Suppliers on Sedex	31

Supplier by category

Consistent with prior years, Notre Dame's procurement activity continues to include **high-risk categories such as building and construction, ICT hardware, labour hire, cleaning and security services, and facilities management**, which are recognised as having elevated modern slavery risk due to labour intensity, complex supply chains and reliance on third-party workforce models.

CATEGORY	PERCENTAGE	BASELINE SPEND	NUMBER OF SUPPLIERS	PERCENTAGE OF SUPPLIERS
Building and construction	12.0%	\$26,169,362.72	81	5.4%
Furniture and office supplies	4.9%	\$10,658,233.84	24	1.6%
Food and catering services	4.2%	\$9,228,113.59	84	5.6%
Labour Hire	2.7%	\$5,966,421.76	15	1.0%
Medical devices and supplies	1.8%	\$3,892,675.23	25	1.7%
Cleaning and Security	1.8%	\$3,827,319.10	32	2.1%
Finance and Investment	1.3%	\$2,929,897.18	8	0.5%
ICT Hardware	1.0%	\$2,085,230.81	12	0.8%
Facility management and property maintenance	0.6%	\$1,334,073.61	30	2.0%
Transport and Logistics	0.3%	\$689,753.40	19	1.3%
Waste management services	0.1%	\$308,020.96	11	0.7%
Linen, laundry and textile products	0.1%	\$111,301.00	2	0.1%
Events and event management	0.0%	\$3,117.00	1	0.1%

Supplier by region

Notre Dame's supply chain remains predominantly domestic, with the majority of Tier 1 suppliers located in **Australia**, alongside a smaller proportion of international suppliers across both low and high risk jurisdictions.

REGION	RISK PROFILE
Australia	Low risk (majority of suppliers)
United States, Europe (UK, France, Germany, Italy, Austria, Denmark, Norway)	Low risk
Asia (China, India, Bangladesh, Cambodia, Taiwan, UAE)	Medium to high risk
New Zealand	Low risk

These figures provide an overview of Notre Dame's supply chain profile in 2025 and highlight the ongoing presence of modern slavery risk across both supplier geographies and procurement categories.



Modern slavery risks to students

As an institution responsible for student welfare, Notre Dame acknowledges the risk of modern slavery affecting students, particularly those engaged in employment, internships and international placements. We have identified some key areas of concern for our students:

- Student employment risks, particularly in hospitality and service industries where wage exploitation and underpayment remain prevalent.
- Increased vulnerabilities among international students, including risks related to exploitative recruitment practices by third-party agents.
- Ethical concerns in placement programs, ensuring that students engaged in work-integrated learning and internships are placed in organisations that uphold fair labour standards.

International student recruitment is also acknowledged as a key modern slavery risk in the university sector. The International Student Network is a program that offers a range of events and activities designed specifically to help international students settle in and feel part of the Notre Dame community. International students are offered access to 24/7 counselling support and wellbeing services.

Our Careers and Employability team offers career support to students from their first year of study to 18 months after graduation. They conduct workshops, provide career resources and offer one-to-one appointments for bespoke advice. Students and alumni can access job opportunities, guidance and support through this service which also aims to educate students on how workplaces operate.

Our people

Notre Dame is dedicated to fostering an inclusive and ethical workplace, guided by our Code of Conduct and a suite of policies that uphold fair employment practices and expected standards of behaviour. These policies are publicly accessible and regularly reviewed to ensure compliance with best practices.

Our staff community of 1,604 employees spans a diverse range of roles and responsibilities across our campuses. The University follows a rigorous recruitment process, ensuring all employees – whether hired directly or through third-party agencies – undergo comprehensive verification of their right to work in Australia. This includes background checks and the support of migration lawyers for visa arrangements, mitigating any risks of labour exploitation.

In 2025, Notre Dame's reliance on contract and agency labour amounted to approximately \$2.6 million, reflecting the need for a flexible workforce to support our dynamic academic and operational functions. However, modern slavery risks within employment structures remain a concern due to:

- the complexity of award systems across various sectors creating challenges in ensuring consistent and fair employment conditions
- the intricacies of visa frameworks, which can impact international staff and increase vulnerabilities to exploitative arrangements
- recruitment agency practices, particularly in international student employment, where gaps in oversight could unintentionally expose individuals to wage theft, contract deception or exploitative conditions.



CRITERION 4

Actions taken

The University of Notre Dame Australia remains committed to eliminating modern slavery risks within its operations and supply chains. Throughout 2025, we have taken significant steps to strengthen our ethical procurement practices, align with global sustainability standards and foster transparency across our supply chain. Below is an overview of our actions and progress.

Collaborative initiatives in combating modern slavery

Collaboration with the Australian Catholic Anti-Slavery Network (ACAN)

Notre Dame has actively participated in the ACAN Program for assessing and addressing modern slavery risks within our operations and supply chains. The ACAN Program provides supplier engagement support and data, enabling a systematic and comprehensive supply chain risk assessment. In 2025 the ACAN Modern Slavery Risk Management Program launched a new purpose-built data management platform – ROTA. ROTA centralises the ACAN Risk Management Program framework and facilitates supplier performance evaluation and engagement.

Notre Dame followed ACAN's structured supplier engagement plan, which included:

1. Evaluation of the modern slavery risk within operations and supply chains, using the ACAN Risk Taxonomy
2. ACAN supplier survey to identify supplier revenue, number of employees, countries of origin for goods sourced overseas, workforce contractual arrangements and Sedex membership status.
3. Supplier education on modern slavery and risk management in key areas: cleaning, building and construction, procurement of labour, labour hire and services, sourcing goods from overseas, grievance mechanisms and remediation.
4. Onboarding suppliers to Sedex requires a business address, contact details and goods or services provided.
5. Sedex Self-Assessment Questionnaire (SAQ) helps suppliers to evaluate their practices against established standards and identify areas for improvement.
6. Desktop review to identify key actions required from suppliers.
7. Enhancing supplier screening using Know Your Client (KYC) intelligence software.
8. Corporate social compliance audits provided a point in time, objective and independent verification process of supplier alignment with local laws and worker wellbeing standards.

9. Conducting a Domus 8.7 Index modern slavery statement assessment on selected suppliers in high-risk categories.
10. Utilising the ACAN Prequalified Supplier Directory – a list of preferred suppliers accessible to Catholic organisations

Collaboration with the Australian Universities Procurement Network (AUPN)

We have continued working closely with the AUPN to leverage shared resources, industry best practices and insights to improve supply chain transparency. This partnership has enabled the development of enhanced supplier engagement strategies as well as sector-wide discussions on modern slavery risks, facilitating knowledge sharing and solutions development.

As a proactive member of the AUPN Modern Slavery Advisory Board, Notre Dame is at the forefront of formulating strategies to tackle modern slavery and human trafficking within supply chains.



Supply chain insights

Understanding modern slavery risks within Notre Dame's procurement landscape remains a critical component of risk identification and assessment. In 2025, the University has continued to build on its data-driven approach, leveraging enhanced supplier screening, analytics and sector collaboration to further refine its understanding of risk exposure.

Key insights include:

- expanded supplier risk visibility, with 1,508 suppliers profiled and 466 identified within high risk procurement categories under ACAN's taxonomy, enabling more targeted risk identification across procurement activities
- maturing supplier screening capability, with 529 supplier screenings conducted and a concentration of suppliers identified across high (40.91%) and moderate (15.91%) risk categories, reinforcing the ongoing presence of modern slavery risk within the supply chain
- increased depth of supplier insights through ACAN engagement, 107 supplier surveys were completed in 2025 taking the total to 227 providing greater visibility over supplier workforce composition, labour practices, and governance maturity
- enhanced transparency across supplier labour models, with data indicating a continued reliance on casual labour (39.06%) and subcontracting arrangements (20.83%), which are recognised risk indicators for potential labour exploitation
- continued participation in sector-wide initiatives, including ACAN and AUPN, supporting shared insights into supplier risk trends, emerging issues and best practice approaches across the higher education sector.

These insights provide a more comprehensive and evidence-based understanding of modern slavery risk exposure across Notre Dame's supply chain.

Enhancing supply chain transparency and traceability

In 2025, Notre Dame progressed its focus on improving visibility and traceability across its supply chain, including enhanced oversight of suppliers beyond Tier 1 where feasible.

This was supported through:

- expanded supplier risk profiling and screening, with 529 supplier screenings completed and 466 suppliers identified within high risk procurement categories, strengthening visibility across higher risk areas of the supply chain
- increased supplier data collection and disclosure, including 227 ACAN-aligned supplier surveys (107 completed in 2025), providing greater insight into supplier labour practices, workforce composition and subcontracting arrangements

- improved mapping of supply chain risk exposure, leveraging ACAN's Procurement Taxonomy and external benchmarks to identify high-risk categories and supplier geographies, including offshore sourcing locations in Asia where modern slavery risks are elevated.

Enhanced third-party screening and monitoring, with 529 suppliers subject to screening processes, including identification of high and moderate risk indicators requiring further review.

Increased transparency through Sedex engagement, with 72 suppliers identified for onboarding and 31 actively engaged on the platform, supporting improved visibility of labour standards and risk indicators within supplier operations.

These activities have strengthened Notre Dame's ability to identify and assess modern slavery risks within its supply chain, particularly in higher-risk procurement categories and supplier geographies.

Strengthening supplier engagement and capacity building

In 2025, Notre Dame continued to enhance supplier engagement, with a focus on improving awareness, accountability and alignment with ethical procurement expectations.

Key outcomes include:

- ongoing supplier engagement and communication, with 897 supplier communications undertaken to support awareness, information sharing and engagement on procurement and compliance expectations
- supplier education and capability uplift, supported through ACAN-aligned initiatives, including supplier surveys, Sedex engagement and participation in sector-wide knowledge sharing forums
- targeted engagement with higher risk suppliers, particularly within categories such as construction, facilities management, ICT hardware and labour hire, where subcontracting and labour intensity increase modern slavery risk exposure
- continued collaboration with sector networks, including ACAN and AUPN, to share insights, align approaches and contribute to sector-wide improvements in ethical procurement practices
- strengthened supplier expectations through governance frameworks, reinforcing requirements relating to ethical conduct, transparency and compliance with modern slavery obligations across supplier relationships.

These activities support a more consistent and structured approach to supplier engagement, with increasing alignment to sector best practice.

Development and implementation of a sustainable procurement approach

In 2025, Notre Dame progressed its commitment to integrating sustainability and ethical considerations into procurement practices, recognising the interconnection between environmental, social and governance (ESG) factors and modern slavery risk.

Key developments include:

- advancement of a structured sustainable procurement approach, incorporating considerations of ethical sourcing, labour practices and supplier accountability into procurement and supplier management processes
- integration of modern slavery risk within broader procurement governance frameworks, aligning sustainability objectives with existing procurement policies, procedures and decision making practices
- continued focus on high risk procurement categories, ensuring that supplier engagement, screening and contract management activities prioritise areas with elevated exposure to labour exploitation risks
- ongoing use of longer term supplier arrangements in higher value spend areas, supporting improved visibility, continuity and oversight of supplier performance and compliance.

This approach reflects a shift towards a more integrated and mature procurement model, where sustainability and modern slavery considerations are embedded within core procurement activities.

Internal education

All staff at Notre Dame are encouraged to complete the workshops and training facilitated by ACAN. In 2025, 59% of all staff have completed the Modern Slavery 101 module.

Additionally, we identified groups for whom training will be mandatory in line with their responsibilities and sent out targeted communications for these groups to undertake a further module – Modern Slavery Business Relevance – which provides a business perspective on modern slavery and why it is important to manage modern slavery risk.

The University is also actively reviewing its operations to target additional staff for training whose work may intersect with our key risk areas. This is an ongoing process given the arrival of new staff and structural changes.



Grievance mechanisms and remediation

Notre Dame acknowledges that effective grievance mechanisms are a critical component of a robust modern slavery risk management framework. While our existing workplace complaints and whistleblower policies provide general avenues for raising concerns, the University is currently reviewing how these processes can be adapted or expanded to ensure they are accessible, confidential and equipped to handle modern slavery-related disclosures, particularly those affecting vulnerable workers across our supply chain.

In 2025, the Modern Slavery Working Group discussed strengthening grievance pathways and this will be an area of focus for 2026.

Notre Dame is also considering alignment with the Domus 8.7 Remediation Framework, which outlines expectations for remediation pathways in the Catholic sector. This will form part of our 2026 action plan.

Notre Dame is a founding member of Domus 8.7. Domus 8.7 was established as an agency of the Catholic Archdiocese of Sydney in 2020 as a key element of the ACAN Modern Slavery Risk Management Program. This collaborative approach to remediation is aligned with the Modern Slavery Act and Catholic Social Teaching which are centred on the needs, wellbeing and empowerment of people impacted.

Domus 8.7 provides Notre Dame with:

- resources that enable us to listen to workers (grievance channel)
- a 24/7 careline for workers on our sites, staffed by professional counselors
- direct support to people impacted by modern slavery
- guidance and technical assistance to prevent, identify and remediate modern slavery
- a documented process to assess if an organisation has caused, contributed or is directly linked to modern slavery and modern slavery indicators.

Domus 8.7 empowers people impacted by modern slavery to have choice and control over what forms of remediation are meaningful to them and to engage safely with business/supply chain actors. Supports may include:

- modern slavery indicator assessment
- needs assessment, case coordination, response and remediation planning
- referrals to community, social services, unions
- transport, accommodation, financial and food support
- legal support, referrals, accompaniment and advocacy
- job training, retraining and redeployment
- accompaniment and advocacy to engage with government and law enforcement agencies
- opportunities to contribute lived expertise to improve modern slavery responses.

The Domus 8.7 Advisory Committee also includes a person with lived expertise, Mr Moe Turaga. Domus 8.7 is a registered charity with the Australian Charities and Not-for profits Commission (ACNC) and is an endorsed Public Benevolent Institution with deductible gift recipient (DGR) status. ABN 244 72497189

While no formal modern slavery-related complaints or grievances were reported in 2025, we recognise this may reflect a lack of awareness or appropriate mechanisms, rather than the absence of risk. As such, the development of a dedicated grievance framework remains a key priority moving forward.

Where modern slavery or labour exploitation is identified, Notre Dame is committed to prioritising the safety, dignity and wellbeing of affected individuals. This includes building awareness and capability through targeted training and development on modern slavery risks, business relevance, grievance mechanisms and remedy pathways; working collaboratively with suppliers to implement corrective action plans; engaging specialist support services where appropriate; and ensuring that no individual experiences retaliation for raising concerns.

Future actions

Expansion of academic offerings

Notre Dame is developing a microcredential course available to students and community members on identifying, preventing and responding to modern slavery and human trafficking. The one-day intensive course will cover obligations and risk mitigation in supply chain and procurement, legal compliance (e.g. the Australian Modern Slavery Act 2018), policing and victim identification and support. The aim is to deliver this course in 2027.

Enhancing supply chain visibility and risk targeting

Notre Dame will further refine its supply chain risk profiling by:

- expanding visibility beyond Tier 1 suppliers, with increased focus on subcontracting arrangements and high-risk sourcing regions
- enhancing data-driven risk segmentation, aligning procurement data with ACAN taxonomy and external risk indices
- prioritising high risk categories (e.g. construction, ICT hardware, labour hire, facilities management) for deeper analysis and monitoring.

Strengthening supplier due diligence and monitoring

The University will continue to mature its supplier due diligence approach by:

- increasing the coverage and consistency of supplier screening and assessments, particularly for high and medium risk suppliers
- expanding Sedex engagement and supplier self-assessment participation to improve transparency of labour practices
- embedding risk-based due diligence requirements into procurement processes, including sourcing, onboarding and contract management.

Embedding modern slavery into procurement processes

Notre Dame will further integrate modern slavery considerations into core procurement activities by:

- embedding modern slavery risk assessment into sourcing and evaluation processes, particularly for procurements above defined thresholds
- strengthening contractual requirements, including modern slavery clauses, supplier obligations, and reporting expectations
- aligning modern slavery risk management with broader contract management and supplier performance frameworks.

Building supplier and internal capability

Recognising the importance of capability in managing risk, the University will:

- continue to support supplier awareness and capability uplift, including participation in sector-led initiatives and education programs
- enhance internal procurement capability, ensuring staff are equipped to identify and manage modern slavery risks within their categories
- leverage sector collaboration (ACAN and AUPN) to share insights, tools and best practices.

Measuring effectiveness and continuous improvement

To support ongoing maturity, Notre Dame will focus on:

- developing metrics and reporting mechanisms to assess the effectiveness of modern slavery risk management activities
- improving data quality and reporting across procurement systems to enable more accurate risk monitoring
- continuing to align its approach with evolving regulatory expectations and sector best practice.

Strengthening grievance mechanisms, awareness and supply chain visibility

To further support effective risk identification and remediation, Notre Dame will introduce a new modern slavery learning module titled **Grievance and Enhancing Supply Chain Visibility and Risk Targeting**, which will:

- build understanding of effective grievance mechanisms and how they enable workers and suppliers to safely report concerns
- strengthen capability to identify, escalate and respond to modern slavery risks across operations and supply chains
- support enhanced visibility beyond Tier 1 suppliers by linking grievance data with supply chain risk profiling and targeting
- reinforce the role of grievance mechanisms in ensuring meaningful remedy and continuous improvement in modern slavery risk management.



CRITERION 5

Assessing effectiveness

The ACAN Modern Slavery Maturity Assessment has played a pivotal role in evaluating Notre Dame's capacity to mitigate modern slavery risks within our operations and supply chains. This comprehensive assessment, derived from the self-reported Entity Profile Survey, serves as a key tool for our Modern Slavery Working Group to define future priorities, establish a multi-year action plan and allocate resources effectively.

In 2025, the ACAN Program adopted a globally recognised risk measurement system through Sedex. This aligns reporting entities with a methodology that combines global data about risks in different countries and industries with site-specific information from the Sedex platform. Sedex regularly updates the methodology to ensure it is aligned with new and emerging risks.

To drive further progress, we have undertaken targeted initiatives to address identified gaps while reinforcing our strengths. These initiatives include:

- enhancing supplier training and engagement through expanded education programs and direct supplier forums
- strengthening grievance remediation processes to ensure accountability and transparency in resolving concern
- mandating supplier self-assessments in onboarding to proactively manage risks and align procurement decisions with ethical and sustainability commitments
- expanding the integration of modern slavery compliance into procurement evaluations, ensuring that decision making reflects human rights considerations.

This commitment to ongoing development and refinement underscores Notre Dame's role as a leader in ethical procurement and modern slavery risk management.

Our journey of continuous improvement

The following roadmap shows our key actions over the last six years:

2025

- Expanded supplier risk screening and profiling, with over 500 suppliers assessed and enhanced visibility across high- and moderate-risk categories, supporting more targeted identification of modern slavery risks.
- Increased supply chain transparency through data-driven insights, including ACAN-aligned supplier surveys and improved understanding of supplier workforce composition, subcontracting, and labour models.
- Strengthened third-party due diligence and monitoring, including enhanced screening processes and identification of suppliers requiring further review or engagement.
- Progressed supply chain traceability initiatives, with greater focus on high-risk procurement categories and improved mapping of supplier geographies and risk exposure.
- Expanded engagement with Sedex, identifying priority suppliers for onboarding and increasing visibility of labour practices within higher-risk supplier segments.
- Continued targeted engagement with high-risk categories (including construction, facilities management, ICT hardware, and labour hire), reinforcing oversight in areas with elevated exposure to labour exploitation risks.
- Enhanced supplier engagement and communication activities, supporting increased awareness of ethical procurement expectations and modern slavery obligations.
- Further embedded modern slavery risk considerations into procurement governance frameworks, including alignment with sourcing, supplier management, and contract oversight processes.

2024

- Increased scrutiny of indirect suppliers by leveraging reporting tools to improve visibility in high-risk industries such as construction, cleaning and ICT hardware.
- Conducted targeted engagement with suppliers in outsourced services, where subcontracting can obscure unethical labour practices.
- Reviewed and updated supplier contracts to include stricter compliance measures on modern slavery, focusing on wage transparency, subcontracting policies and worker protections.
- Strengthened agreements with partner institutions and employers to ensure fair work conditions and ethical recruitment practices for students.
- Introduced additional controls for recruitment agencies, ensuring labour hire firms meet ethical employment practices, particularly for casual and contract workers.
- Launched an anonymous reporting tool to allow workers in high-risk supply chain sectors to raise concerns about unfair treatment, unethical recruitment or exploitative practices.
- Integrated modern slavery risk indicators into investment and large-scale procurement approvals to ensure all major spending decisions consider human rights impacts.

2023

- Advanced collaborative efforts with ACAN and AUPN on modern slavery.
- Created specialised focus groups for policy and procedure enhancement in modern slavery.
- Submitted procurement data for comprehensive risk assessments and benchmarking in collaboration with ACAN and AUPN.
- Expanded educational programs in social justice, including modern slavery.
- Engaged with suppliers in key sectors for compliance frameworks against modern slavery.
- Implemented mandatory self-assessments and established a register of supplier credentials.
- Established an Operational Level Grievance Mechanism for modern slavery concerns.
- Facilitated internal education efforts via ACAN workshops to increase awareness on modern slavery.

2022

- Integrated modern slavery considerations into existing procurement policies.
- Conducted annual risk reviews that were industry-specific and tailored to the nuances of commodity, geographic location and labour conditions.
- Escalated training programs, reaching 73% of our employees in key roles for managing modern slavery, to improve awareness and understanding of modern slavery risks.
- Established robust grievance and whistleblower policies, strengthening the infrastructure for addressing grievances and ensuring improved conditions.
- Reinforced our commitment to dismantling modern slavery through targeted educational initiatives and comprehensive supplier engagement programs.
- Proactively worked with suppliers, especially in high-risk sectors, to develop tailored compliance frameworks against modern slavery.
- Commenced dedicated programs in Modern Slavery and Human Trafficking.

2021

- Engaged in joint training and resource sharing with ACAN.
- Conducted a second gap analysis to evaluate modern slavery risk management maturity.
- Analysed agreements for modern slavery clauses and risk management.
- Organised ACAN-facilitated workshops and training for essential stakeholders.
- Modified Procurement Policy and Procedures in line with Modern Slavery Act.
- Reviewed and amended agreements to include modern slavery clauses.
- Developed Modern Slavery Side Agreement template.
- Progressed in creating Modern Slavery and Whistleblower Protection Policies.
- Communicated Notre Dame's anti-modern slavery expectations to over 4,000 suppliers.
- Enhanced the supplier onboarding process with a focus on modern slavery risk.

2020

- Formed Modern Slavery Project Group with staff from Legal, Finance and Procurement.
- Partnered with ACAN for shared resources and training.
- Conducted a gap analysis with ACAN and benchmarking survey with KPMG.
- Performed risk assessment for Tier 1 suppliers, reviewed top 200 supplier agreements.
- Released Modern Slavery Statement.
- Joined ACAN workshops to educate key staff and suppliers, focusing on the building and construction industry.
- Revised Procurement Policy and Procedures according to the Modern Slavery Act 2018.
- Initiated development of Modern Slavery and Whistleblower Protection Policies.
- Engaged suppliers with letters against modern slavery practices.
- Updated supplier onboarding to incorporate modern slavery risk assessments.

We have used ACAN baseline metrics to benchmark our efforts as follows:

	ACTIVITY	2024	2025
INTERNAL / STAFF	Hours spent on modern slavery activities	394	290
	Individual staff completed e-learning	1,095	1,204
	E-learning modules completed	1,343	1,204
EXTERNAL / SUPPLIER ENGAGEMENT	Total number of suppliers	2,227	1,508
	Number of suppliers with visible contact information and ABN	2,186	1,493
	Number of suppliers across high-risk categories	590	466
	Number of ACAN Supplier Surveys completed	171	227
	Supplier staff attending capacity building webinars	14	18
	Invited to join Sedex	65	72
	Joined Sedex	75	31
	Sedex SAQ completed	23	18
	Social audits	2	0
	Corrective actions	0	0

CRITERION 6

Internal consultation

Notre Dame does not own or control any other entities and therefore this criterion is not applicable.

CRITERION 7

Other relevant information

Empowering change through academic education

Notre Dame is dedicated to promoting the dignity of the human person and educating the next generation of professionals and leaders to take action against modern slavery and human trafficking. The University aims to achieve this with a multifaceted approach including education, research, public awareness and engagement.

The University has expanded its academic offerings to include a range of undergraduate and postgraduate programs and courses focused on modern slavery and human trafficking as well as associated broader social justice issues.

- Notre Dame offers a Graduate Certificate in Modern Slavery and Human Trafficking and a Graduate Diploma in Modern Slavery and Human Trafficking. The courses in the graduate certificate cover practical topics relating to business practices and legal compliance, law enforcement and ethical and moral leadership. The graduate diploma provides a deeper analysis of modern slavery and human trafficking. As well as required courses that focus on legislative responses, business and human rights risks, and the efforts made by civil society organisations to combat this problem, the program includes elective courses that allow students to select topics that connect with their professional and personal goals.
- A 'responsible organisations specialisation has been added to the Master of Business Administration (MBA) offering students the opportunity to study the ethical production of goods and services.
- The undergraduate program in Social Justice provides students with a broad understanding of social issues, including modern slavery and human trafficking.

The University has an undergraduate course on modern slavery and human trafficking for business students aimed at nurturing future ethical business leaders. There is also an elective unit for law students exploring the law and modern slavery. In Criminal Law, a compulsory law unit, the course content uses modern slavery as a primary example of corporate criminal responsibility.

The University's programs are designed to achieve several objectives, including increasing awareness of modern slavery and human trafficking, ethical and legal obligations related to these crimes and the risks associated with supply chains. The programs also aim to develop skills for designing, implementing and monitoring ethical supply chains, as well as for statutory and public reporting and auditing, assurance

and accreditation of supply chains. Additionally, the programs aim to enhance knowledge and skills for better policing of human trafficking. The University has taken additional steps to educate students on the challenge posed by modern slavery and human trafficking, including an increased focus on ethics in the curriculum, with all schools and faculties incorporating ethics education into their courses.

A growing research agenda in the area of modern slavery supports learning and teaching and further highlights Notre Dame's commitment to increasing awareness and contributing to knowledge.

Laudato Si' Action Platform integration

In 2024, we strengthened our commitment to Pope Francis's encyclical *Laudato Si'* by actively embedding its principles into our operational and procurement processes. The encyclical provides a contemporary Catholic lens on the relationship between environmental sustainability, social justice and human dignity. Importantly, *Laudato Si'* recognises that modern slavery is intertwined with broader systemic issues such as environmental degradation, global economic inequality and the erosion of labour rights.

By embedding *Laudato Si'* into our institutional practices, the University takes a holistic approach to addressing the root causes of modern slavery. This alignment not only reflects our Catholic identity but also reinforces our social responsibility to protect vulnerable individuals from exploitation.

Key actions included:

- development and implementation of a *Laudato Si'* action plan across all campuses which emphasises that the economy and the people who rely on it are embedded within the natural environment, not separate from it, and that each of us is therefore responsible for acting in a sustainable manner
- sustainability criteria embedded into procurement processes, ensuring that supplier selection aligns with ethical and environmental commitments
- collaboration with campus operations teams to enhance sustainability practices, including responsible waste management and ethical sourcing of university merchandise.
- facilitation of student and staff engagement programs, incorporating workshops and educational sessions that highlight the connection between modern slavery risks and environmental responsibility
- launching a new Core Curriculum elective on "Care for our Common Home".



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