

Uniting Church in Australia, Synod of NSW & ACT
Uniting NSW.ACT

FY25 Modern Slavery Statement.



Uniting



Acknowledgement of Country

Uniting NSW.ACT acknowledges the continuing sovereignty and rich cultural diversity of Australia's First Peoples. We pay our respects to all Elders – past and present – and to all First Peoples on whose lands we live and work.

This is an **interactive PDF** designed to enhance your experience. The best way to view this report is with Adobe Reader and by clicking on the links in the sidebar.

Artwork: 'Journey Flows' by David Williams of Gilimbaa



Foreword

At Uniting NSW.ACT, our commitment to social justice is not just a legacy - it's a living, evolving responsibility. As part of the Uniting Church in Australia, we continue to stand with those who are marginalised, advocating for fairness, dignity, and inclusion in every aspect of our work.

In FY25, we've deepened our efforts to prevent modern slavery across our operations and supply chains. We've strengthened our systems, broadened our partnerships, and sharpened our focus on transparency and accountability. Our approach is grounded in respect for human rights and driven by our purpose: to inspire people, enliven communities, and confront injustice.

We recognise that modern slavery is a complex and global issue. That's why our approach is both proactive and collaborative. We work closely with suppliers, contractors, and partners who share our values - being compassionate, respectful, imaginative, and bold - and who are committed to ethical and lawful business practices.

This statement outlines the actions taken during FY25 to identify, assess, and address modern slavery risks. It reflects our compliance with the Federal Government's Modern Slavery Act 2018 (Cth), and our alignment with international human rights frameworks.

Our work is ongoing. We know that meaningful change requires vigilance, courage, and collective action. We remain committed to continuous improvement, and we invite our stakeholders to walk with us as we build a future where exploitation has no place, and where every person is treated with dignity and respect.

Our FY25 areas of focus:

- Extending the number of suppliers assessed via the third-party agency iPRO's Modern Slavery Assessment Tool (MSAT), from 126 to 217. The assessment analysed our modern slavery risks including geography, downstream supply chain management, labour policies and employment practices.
- Updating and refreshing our Modern Slavery Awareness Training Module to incorporate more relevant case studies and the most up-to-date statistics, ensuring the content stays impactful. The training module has been completed by nearly 1500 of our employees to date.
- Developing a modern slavery training module for completion by our suppliers. Once complete, the intention is that each new supplier to Uniting will need to complete the module before becoming accredited to supply us.
- Refreshing Uniting's Modern Slavery Committee to include representatives from every directorate within our organisation. These representatives will have the responsibility of identifying and mitigating modern slavery risks in their directorate, assisting with the FY26 Modern Slavery Action Plan and communicating modern slavery policy to their teams. The committee will develop Uniting's first 5-year modern slavery action plan.
- Developing a Modern Slavery Risk Register using the business-specific knowledge of the Modern Slavery Committee.
- Conducting a deep dive of our PALM worker program. This initiative was prompted by the NSW Anti-slavery Commissioner, who stated that aged care is a focus area for modern slavery due to its increasing reliance on migrant workers. Uniting conducted a survey of all our PALM workers and followed up with a series of one-on-one interviews.
- Reviewing and updating Uniting's commercial legal contracts to include clauses relating to modern slavery.

Approach methodology

In preparing this statement, the reporting entities consulted with key stakeholders from various parts of the business including Procurement, Human Resources, Risk, Property, Learning and Development, Seniors Services, Talent and Acquisition, Communities, Social Impact and Advocacy, and other members from our services as required.

These stakeholders agreed on a general approach and a commitment to developing an action plan which will be monitored throughout the next reporting period. This statement has been prepared and published in accordance with The Act.



A message from Tracey Burton

At Uniting, our mission has at its foundation the ethos of the Uniting Church - including compassion, courage, and a deep respect for human dignity. As we present our FY25 Modern Slavery Statement, I reaffirm our unwavering commitment to protecting the rights and wellbeing of all people, especially those most vulnerable to exploitation.

Modern slavery is a global challenge that demands local leadership. This year, we have strengthened our internal systems, deepened engagement with suppliers, and embedded human rights principles throughout our operations. Notably, we conducted a comprehensive survey of our Pacific Australia Labour Mobility (PALM) program to ensure that the promises made during recruitment are reflected in the lived experiences of our migrant workers.

Of the 44 PALM workers who responded, 100% reported their experience as either 'good' or 'very good' when asked about their overall experience working in Australia through the PALM scheme, with no negative or neutral responses. We also conducted one-on-one interviews to further understand their perspectives. While some issues unrelated to modern slavery were raised, the overall feedback was very positive.

We have listened to our partners, learned from our communities, and acted on insights gained through risk assessments and training. Our updated procurement practices, legal frameworks, and supplier onboarding processes reflect our determination to prevent harm and promote transparency.

This work is a shared journey. I invite our colleagues, clients, and partners to join us as we confront injustice and build a future where every person is safe, valued, and free from exploitation.

Thank you for your support and commitment to this vital cause.

This statement was approved by the Board of Uniting NSW.ACT on 11 December 2025.



Tracey Burton
Chief Executive, Uniting NSW.ACT

Uniting NSW.ACT: Our structure and operations

Uniting is established under By-law 4.1.2(a) of The Uniting Church in Australia Synod of NSW and the ACT, as an institution with responsibility for the social justice, community services, and chaplaincy work of the Church. It has the regulatory responsibilities of a Public Benevolent Institution (PBI), which reflects its main purpose to be the relief of poverty and distress, operating within the mission and ethos of the Church..

Uniting (ABN 78 722 539 923) generated total revenue of \$1,448m in FY25. We are 13,000 employees and volunteers who are driven to be there for others. Our range of services throughout NSW and the ACT includes:

| | | | | |
|----------------------------------|---------------------------------------|--|--------------------------------------|------------------------|
| Residential aged care | Home and community care | Retirement and independent living villages | Early learning and childcare centres | Disability support |
| Foster care and aftercare | Counselling and mediation | Family services | Youth services | Mental health services |
| Housing and homelessness support | Medically supervised injecting centre | Social justice and advocacy campaigns | | |

How the Uniting NSW.ACT Board governs

Uniting NSW.ACT does not own or control any other reporting entity that is not covered by this statement.

The Uniting Church in Australia Synod of NSW and the ACT

Uniting Board

Chief Executive
Tracey Burton

- Board Sub-committees**
- Mission Governance and Collaboration
 - Audit, Risk and Treasury
 - Communities
 - Seniors Services
 - Remuneration and Board Governance



Social Impact and Advocacy Directorate

COO
Patrick Reid



How the Uniting Board governs

Our position on modern slavery

Modern slavery is a grave violation of human rights, encompassing exploitative practices such as human trafficking, servitude, forced labour, debt bondage, forced marriage, and wage theft. These acts undermine the dignity of individuals and are recognised as serious crimes under Australian law.

At Uniting, our commitment is not only legal, but also moral, ethical, and deeply aligned with our purpose to inspire people, enliven communities, and confront injustice. We believe that every person deserves to live free from exploitation and we are resolute in our efforts to ensure that modern slavery has no place in our organisation or supply chains.

We uphold the human rights of our employees, volunteers, clients, suppliers, and business partners. Our systems are designed to identify, assess, and manage risks to these rights, and we continuously strengthen our practices to reflect evolving standards and expectations.

We also recognise that ethical employment is foundational to human dignity. That's why we resource our workplaces with fair wages, leave entitlements, and inclusive employment practices. Discrimination, harassment, and any form of exploitation are unacceptable and we will not tolerate such behaviour in any aspect of our operations.

Our position is clear - modern slavery is incompatible with our values of compassion, respect, imagination, and boldness. We remain committed to continuous improvement, transparency, and collaboration as we work to protect the rights and wellbeing of all people.



Resourcing our workplaces

We strive to be an equal opportunity employer in all our workplaces. We are committed to ensuring our employment conditions align with minimum wages, hours of work, appropriate leave provisions, and the ability to sustain the health, safety and wellbeing of our employees, volunteers, contractors, and visitors.

We are also committed to creating and maintaining diverse, inclusive and safe workplaces for all. Uniting routinely monitors and reviews our own quality and risk frameworks, policies, systems, and processes.

We have dedicated resources to measure, manage and eliminate any human rights violations in our workplaces through:

Policies and governance – our Board leads our services to implement strong corporate governance, ensuring all decisions and actions are based on transparency, integrity, responsibility, and performance for long-term sustainability.

Ethics and conduct – we recognise that our employees, volunteers, contractors, directors, and agents must maintain a compliant and ethical approach to business practices, and we are committed to dealing honestly and fairly with our clients, and to manage the risk of unfair client outcomes wherever we operate.

Employee training and awareness – to inform our teams of their obligations to uphold laws, regulations, codes, or standards as applicable.

Providing the ability to speak out – Uniting has various mechanisms to ensure employees can provide feedback and raise concerns. This can be done through onboarding and engagement surveys, our Continuous Conversations model of supervision, an employee helpline (through which HR and Payroll services can be reached directly), and a whistle blower hotline. This hotline can be used when employees would rather use anonymous communication channels. These functions are supported by a rigorous policy framework that supports our employees.

Protections for migrant workers – in response to the aged care workforce crisis, Uniting has entered into an industry labour agreement that expands our ability to recruit migrant workers. Uniting’s international recruitment process is governed by our Recruitment & Onboarding Policy and fully complies with the Australian Migration Act 1958. Uniting partners with specialist immigration firms to uphold high legal and ethical standards. To ensure migrant workers fully understand their rights, Uniting provides a Fair Work Information Statement during onboarding, paid time for meetings with the Health Services Union (HSU), and access to HR professionals for guidance. Migrant workers are compensated at the same standards as all other employees, following Enterprise Agreements, Modern Awards, and our corporate remuneration framework. Migrant workers have access to the same benefits and career development opportunities as other employees, supported by Uniting’s capability framework and 70:20:10 development approach.

Our commitment to addressing modern slavery is reflected in our policies:

| POLICY | PURPOSE |
|---|---|
| Supplier Code of Conduct | Outlines our baseline expectation that suppliers comply with laws and regulations and have effective systems and controls in relation to labour and workforce management, modern slavery, OHS and child safety and wellbeing. |
| Procurement Policy and Procedure | Emphasises Uniting’s commitment to implementing and enforcing effective system and controls to prevent modern slavery in our supply chains, including ensuring that new suppliers accept the standards and expectations in the Uniting Supplier Code of Conduct. |
| Uniting Code of Conduct Policy | The Uniting Code of Conduct (Code) and Child Safe Commitment (Commitment) define the standards of behaviour and boundaries that are the foundation of everything we do and guide every decision we make. The Code and Commitment help guide us in our day-to-day work and interactions. They ensure everyone is clear on what is and is not acceptable at Uniting. |
| Whistle Blower Policy | Provides a platform for our employees and those working within our supply chain to confidentially raise concerns. |
| Child Safe and Protection Policy | Uniting commits to respecting children and will take action to keep them safe. Uniting does not tolerate any form of child exploitation, abuse, or neglect. All employees, carers, and volunteers are expected to remain aware of the welfare of children and young people and are responsible for appropriately responding to and reporting any concerns, allegations, or disclosures of abuse or neglect. |

| POLICY | PURPOSE |
|--|--|
| Uniting Safety and Wellbeing Policy | Uniting is committed to keeping our people safe. We do this by enhancing and maintaining a positive safety culture where strong leadership is visible through the actions of our people. We take the health, safety, and wellbeing of our people seriously and will operate within a framework that holds the safety and wellbeing our people as a core value. |
| Customer Complaints and Feedback Policy | At Uniting we value the ideas, honest views and concerns of our customers, people, stakeholders, and members of the public. Feedback and complaints help us take positive and appropriate action so we can improve the services we deliver. |
| Recruitment and Onboarding Policy | Uniting is committed to sourcing, selecting, appointing, and onboarding the best talent available. We value diversity and applicants from all backgrounds are welcomed and encouraged. We are transparent, equitable, bias-free and fair. |
| Background Checks Policy | Uniting conducts thorough pre-employment and supplier screening. This includes verifying identity, qualifications, employment history and compliance with legal and ethical standards to ensure individuals and organisations align with Uniting's values and obligations. |
| Risk Management Policy and Framework | It is a requirement for all leaders at Uniting to identify, assess, and manage risks as part of their functions and service delivery, including procurement risks. Uniting is committed to fostering a strong risk culture to protect our people and assets in compliance with all relevant laws and regulations. |

Our supply chains

In FY25, Uniting spent \$610m with nearly 4,500 suppliers via direct care or ancillary services.

Direct care

Uniting partners with a diverse range of suppliers who deliver essential care and support directly to our residents, customers and clients. These services include:

Personal support:

Transport, shopping assistance, and daily living services.

Clinical and allied health: Nurses, carers, physiotherapists, occupational therapists, and medical consumables including PPE and support equipment.

Hospitality and hotel services: Food and catering, cleaning, linen and laundry, utilities, security, and waste management.

Wellbeing and enrichment: Chaplaincy, cultural events, and entertainment.

Social procurement

Our procurement strategy prioritises suppliers who generate positive social and environmental outcomes. In FY25 we focused on:

First Nations suppliers: Partnering with organisations such as Supply Nation and Yarpa to increase our spend and build long-term relationships.

Environmental suppliers: Collaborating on initiatives such as hybrid and electric vehicle fleets, sustainable packaging, green energy, and environmentally-friendly stationery.

Social enterprises: Engaging businesses that intentionally tackle social challenges, promote inclusive employment, and support underrepresented communities.

These partnerships align with our ESG commitments and reflect our values of compassion, respect, imagination, and boldness. We continue to explore opportunities to expand our social procurement footprint and measure impact across our operations.

Ancillary services to direct care

To support our frontline services, Uniting engages a broad network of suppliers across property, administration, and maintenance. These include:

Property and construction: Building and refurbishing aged care homes, independent living units, affordable housing, and office sites.

Business administration: Professional services, consultancy, IT, insurance, and corporate support.

Facility maintenance: Landscaping, electrical, plumbing, and general upkeep.

How we're assessing our supply chain risks

Uniting continues to strengthen our approach to identifying and managing modern slavery risks across our supply chains. Our procurement model is centrally managed, providing clear oversight and consistency in supplier engagement, onboarding, and monitoring.

Our relationships with suppliers are built on trust, transparency, and shared values. We continue to prioritise working with reputable local and national suppliers, including those in regional communities. Our due diligence processes now include modern slavery clauses in contracts, and ongoing supplier relationship management.

Together, they ensure that Uniting remains vigilant, responsive, and committed to ethical procurement.



Our modern slavery risk profile

Uniting continues to use the third-party **iPRO Modern Slavery Assessment Tool (MSAT)** to evaluate risks across our supply chains. Since 2022, we have partnered with iPRO to conduct bulk assessments of our key current suppliers, enabling consistent and scalable risk analysis.

In FY25, 217 suppliers have completed and/or updated their assessments, an increase from 126 last year. This represents approximately \$394m (65%) of our total supplier spend, demonstrating strengthened supplier engagement and risk management. Each participating supplier was asked to complete an online self-assessment, which was then evaluated to determine their modern slavery risk profile.

The assessment process includes 2 key scoring components:

- **Inherent Risk Score:** This evaluates risks based on the supplier’s operations, production, and sourcing. Factors include geography, industry sector, type of goods or services, and workforce characteristics.
- **Unmitigated Risk Score:** This assesses the supplier’s internal controls, policies, and procedures. Based on their responses, suppliers are categorised as having inadequate, partial, or adequate risk mitigation.

Each supplier is then assigned a risk category, which informs our engagement strategy and contract management. Notably in FY25, none of the assessed suppliers were placed in the highest risk category without any mitigation controls.

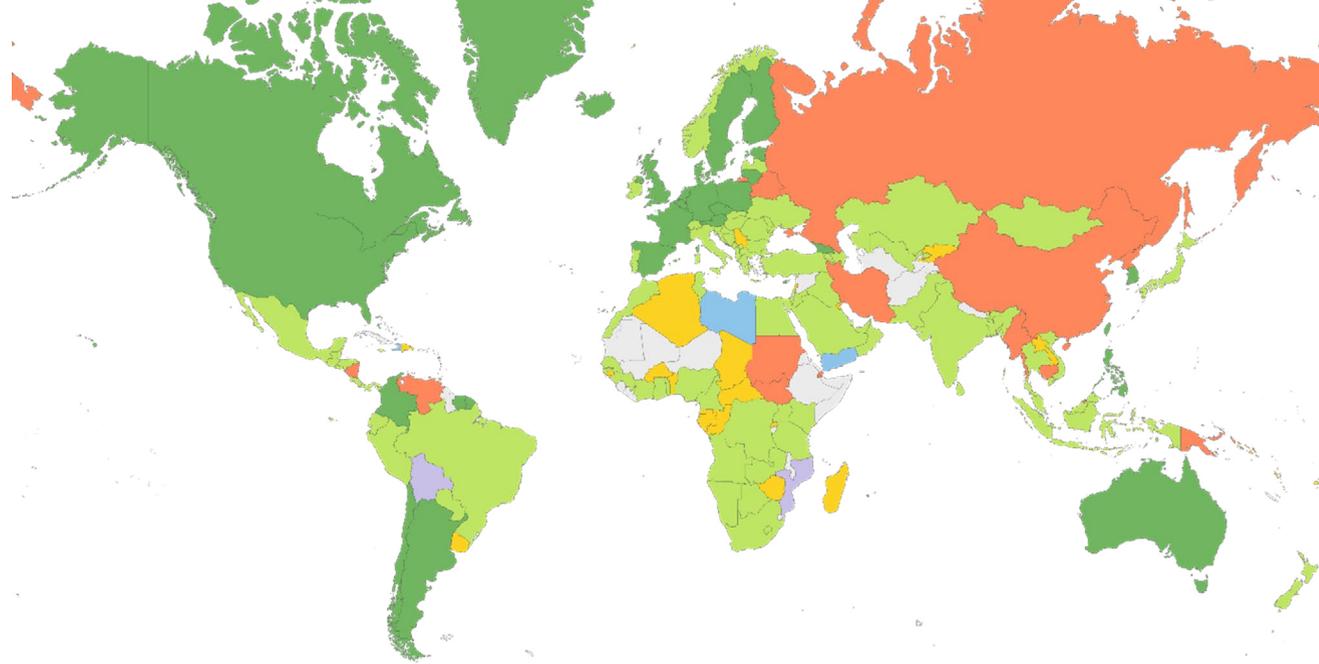
| | | Inherent risk | | |
|--------------|------------|---|--|---|
| | | Low | Moderate to high | Very high |
| Risk control | Adequate | Low risk (low levels of inherent risk) | Low risk (adequate risk control) | High risk (high levels of inherent risk) |
| | Partial | | Medium risk (partial risk control) | |
| | Inadequate | | High risk (inadequate risk control) | |

These efforts are part of our broader commitment to ethical procurement and continuous improvement. By working collaboratively with suppliers, we aim to close gaps, raise awareness, and strengthen protections across our supply chains.

In FY25, Uniting expanded the proportion of suppliers assessed significantly, from 126 to 217 suppliers, reflecting a broader reach across our supply chains. While the proportion of suppliers with low risk and adequate controls decreased slightly from 35% to 27%, they still accounted for the largest share of spend (43% in FY25 vs. 51% in FY24). Suppliers with no inherent risk increased in number but represented a smaller portion of spend (19% vs. 21%).

Medium and high-risk suppliers saw increases in both count and spend, indicating greater engagement with suppliers requiring more oversight. This shift is partly due to Uniting going further down our supply chains, assessing smaller businesses that may have a lower awareness of modern slavery risk management or who believe these risks have less relevance to their operations. These suppliers often lack formal controls or frameworks, which can contribute to higher risk ratings despite good intent. Notably, no suppliers were classified as having high inherent risk in either year, showing consistent avoidance of the highest-risk profiles.

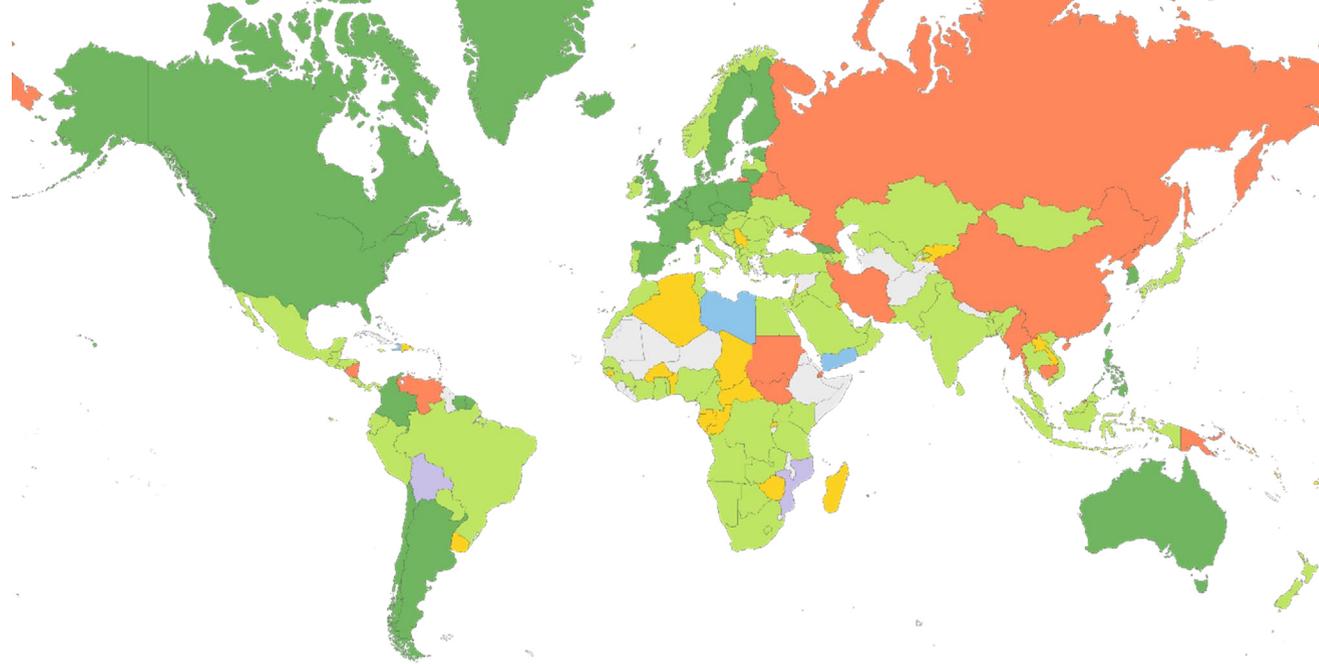
| | NO. OF SUPPLIERS | % OF SUPPLIERS | SUPPLIER SPEND FY25 | % OF FY25 SPEND |
|---|------------------|----------------|---------------------|-----------------|
| Low risk (no inherent risk) | 70 | 32% | \$74,680,471 | 19% |
| Low risk (adequate risk control) | 58 | 27% | \$170,829,571 | 43% |
| Medium risk (partial risk control) | 60 | 28% | \$93,690,072 | 24% |
| High risk (inadequate risk control) | 29 | 13% | \$54,636,432 | 14% |
| High risk (high levels of inherent risk) | 0 | 0% | \$0 | 0% |



Geographical profile of our key suppliers

The map on this page and the next displays our suppliers' countries or regions of operation, overlaid with the Trafficking in Persons Report tiers.

- **180 suppliers had operations only in Australia.** These suppliers represent the majority of our supply chains and reflect our commitment to supporting local and national businesses.
- **10 suppliers had operations in Tier 2 Watch List countries,** including Hong Kong and Fiji. These regions are characterised by significant numbers of trafficking victims and limited evidence of increased efforts to combat trafficking.
- **8 suppliers had operations in Tier 3 countries,** including China. These jurisdictions do not meet the minimum standards of the Trafficking Victims Protection Act (TVPA) and are not making significant efforts to do so.



■ **Tier 1**

Countries and regions whose governments, at the date of this assessment, fully meet the Trafficking Victims Protection Act's (TVPA) minimum standards.

■ **Tier 2**

Countries and regions whose governments, at the date of this assessment, do not fully meet TVPA's minimum standards, but are making significant efforts to meet those standards.

■ **Tier 2 Watch List**

Countries and regions whose governments, at the date of this assessment, do not fully meet the TVPA's minimum standards, and the (increasing) number of victims is significant without proportional action, and/or no evidence of increased efforts to combat trafficking has been provided.

■ **Tier 3**

Countries and regions whose governments do not, at the date of this assessment, fully meet the minimum standards and are not yet making significant efforts to do so.

■ **Tier Special Case**

Countries and regions whose governments do not, at the date of this assessment, fully meet the minimum standards and are not yet making significant efforts to do so.

■ **Uncategorised**

At the date of this assessment, insufficient information is available about these countries or regions and a tier has not been assigned.

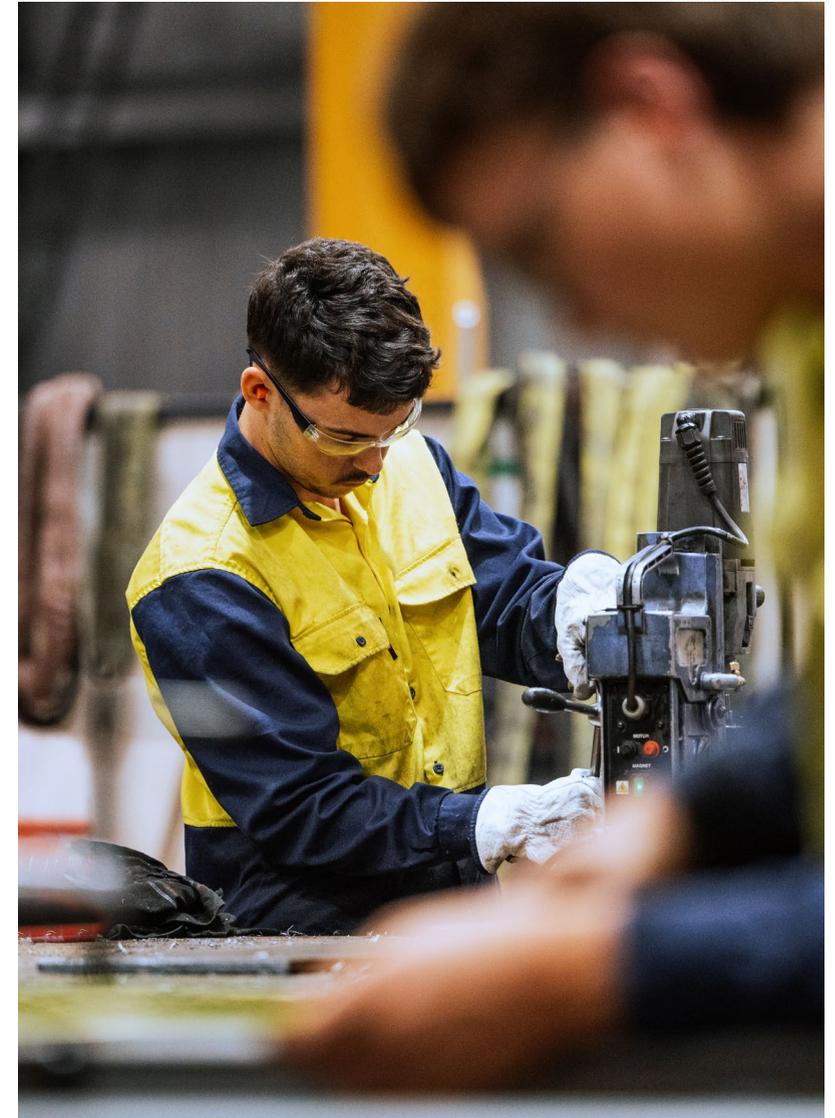
High-risk sectors of operation, production and sourcing

Our suppliers span a diverse range of industries, from healthcare and education to construction and retail. Yet beneath this diversity lies a critical truth: some sectors carry a significantly higher risk of modern slavery.

According to the [Global Estimates on Modern Slavery](#) and the [Child Labour: Global Estimates 2020](#) (ILO and UNICEF, 2021), certain industries are more vulnerable to forced labour and child exploitation. We asked our suppliers to identify whether they operate, produce, or source within these high-risk sectors.

- 45% of suppliers reported operations in one or more sectors linked to forced labour exploitation.
- 35% of suppliers produce goods or services in high-risk sectors.
- 50% of suppliers source goods or services from sectors with known modern slavery risks.

Our most significant exposure remains in construction, which accounts for nearly 2/3 of all high-risk sector operations. This is followed by wholesale, retail, and manufacturing, each contributing to the risk landscape in different ways.



| HIGH-RISK SECTOR | SUPPLIERS WITH OPERATIONS IN: | PRODUCE GOODS IN: | SOURCE GOODS IN: |
|---|-------------------------------|-------------------|------------------|
| Construction | 46 | 31 | 38 |
| Building services contractor | 19 | 18 | 19 |
| Wholesale | 13 | 12 | 18 |
| Retail | 11 | 10 | 12 |
| Labour hire | 10 | 10 | 7 |
| Manufacturing | 9 | 11 | 23 |
| Transportation and services | 8 | 3 | 15 |
| Accommodation and food service activities | 7 | 10 | 26 |
| Cleaning | 6 | 5 | 12 |
| Personal services | 3 | 1 | 2 |
| Security services | 3 | 3 | 3 |
| Domestic work | 3 | 2 | 1 |
| Agriculture, forestry, and fishing | 2 | 1 | 7 |
| Mining and quarrying | 2 | 3 | 2 |
| Maintenance and repair of motor vehicles | 1 | 1 | 10 |

This table reveals the geographic footprint of some of the most vulnerable goods in our supply chains - products that are frequently linked to modern slavery risks, such as forced labour and child exploitation. From garments stitched in Vietnam to electronics assembled in China and Malaysia, each entry highlights where these goods are produced and sourced, offering a snapshot of potential exposure.

Notably:

- **Garments and gloves** are sourced from countries with documented risks of labour exploitation.
- **Electronics** trace back to regions known for complex supply chains and opaque labour practices.

| GOODS AND/OR SERVICES | COUNTRY PRODUCED | COUNTRY SOURCED |
|-----------------------|------------------|-----------------|
| Coffee, cocoa | | Brazil |
| Electronics | China, Malaysia | China, Malaysia |
| Garments | China, Vietnam | China, Vietnam |
| Gloves | | China, Malaysia |

How we're mitigating modern slavery risks

| ACTION PLAN FY26 | | RESPONSIBILITY | TIMELINE |
|------------------|---|---|----------------|
| 1 | Collaboration with other Uniting entities on a joint supplier database for modern slavery audits and status updates | Procurement | Ongoing |
| 2 | Continue to focus on modern slavery evaluation as part of Supplier Relationship Management (SRM) program | Procurement | Ongoing |
| 3 | Review of HR policy and recruitment company onboarding and checks | People Experience | June 2025 |
| 4 | Review of process of PALM workers and immigrants | Seniors Services/People Experience/ Procurement | September 2025 |
| 5 | Refresh Uniting Modern Slavery Committee and development of a Modern Slavery Risk Register | All Uniting | September 2025 |
| 6 | Develop a plan regarding high-risk property suppliers | Property | June 2026 |
| 7 | Develop online modern slavery training module for small/medium businesses | Procurement/Learning and Development | June 2026 |
| 8 | Review of supply agreements to ensure that modern slavery clauses are consistent | Legal | Ongoing |

Addressing the risks of modern slavery with our major suppliers

Focusing on remediation and continuous improvement

Uniting has completed profiling of 217 suppliers to identify areas of elevated risk within our supply chains. This analysis enables us to take a proactive approach to addressing potential vulnerabilities. Our immediate priority is to engage with suppliers identified as high-risk, working collaboratively.

Targeted outreach to medium and high-risk suppliers

Suppliers identified as having a high or medium risk of modern slavery, based on their iPRO assessment, were contacted directly via email. These communications acknowledged the increasing national focus on modern slavery, and rising case numbers across Australia. These emails emphasised Uniting's commitment to ethical procurement and the principle of dignity for all, and encouraged suppliers to take proactive steps to understand and address risks in their operations and supply chains.

Each supplier received instructions on how to access their individual risk profile via the iPRO portal. This risk profile contained a tailored action plan outlining recommended steps to reduce their risk exposure. The action plans included practical measures such as updating policies and procedures, conducting internal audits, and enhancing supplier onboarding processes.

Suppliers were also encouraged to explore a range of free resources, including fact sheets and guidance from the NSW Anti-slavery Commissioner, Anti-slavery Australia, the Australian Human Rights Commission, and the Red Cross. Uniting will follow up with selected suppliers to better understand the actions they are taking and offer support in strengthening their risk management practices.

Employee awareness training

Uniting's online Modern Slavery Awareness Training Module remains available for all employees and volunteers to complete and is mandatory for people leaders, the Procurement team, and any staff involved in supplier engagement. To date, nearly 1500 of our employees have completed this training.

Supplier management

Uniting continues to incorporate and promote our modern slavery position and expectations with our suppliers.

- Uniting's **Supplier Code of Conduct** outlines our commitment to responsible and sustainable supply chain management. It sets clear expectations for suppliers to comply with human rights laws in relation to their workforce and operations. All new suppliers are required to acknowledge and agree to abide by this Code as part of the onboarding process.
- **Uniting supplier agreements** include a dedicated modern slavery clause, reinforcing our commitment to ethical sourcing and compliance. This clause establishes a clear contractual obligation for suppliers to adhere to all applicable modern slavery laws and confirms that they will conduct their operations in a manner aligned with the goal of eliminating modern slavery. By embedding this requirement into our agreements, we ensure that our suppliers are not only legally bound but also actively engaged in supporting our broader human rights objectives.

- **A modern slavery questionnaire** has been integrated into our tender documentation. Supplier responses are compiled in a balanced scorecard, which the evaluation panel uses to select the most suitable supplier.
- Our **Supplier Relationship Management** program monitors our Top 20 suppliers' readiness and compliance with the Modern Slavery Act. Where applicable, we collect these suppliers' modern slavery statements.
- Our **Supplier Addition forms** include questions to confirm that no forced labour will be used in services to Uniting, and compliance with the Modern Slavery Act.
- 217 of our top suppliers have completed the **iPRO Modern Slavery Assessment Tool** so that we can have greater understanding of the modern slavery risk within our supply chains.
- Uniting has developed a protocol for **collaborating with suppliers** when modern slavery is suspected or identified. This protocol adopts a tiered approach based on the perceived level of risk, with higher risks closer to Uniting's operations receiving greater scrutiny.

CASE STUDY – PALM scheme audit: Worker experience and risk insights

In FY25, Uniting conducted a focused audit of temporary migrant workers employed under the Pacific Australia Labour Mobility (PALM) scheme, delivered in partnership with labour-hire provider HealthX. This initiative aimed to assess modern slavery risks and worker welfare across recruitment, employment conditions, and ongoing working arrangements.

The audit included a comprehensive questionnaire to HealthX, an assessment of employment contracts and deduction agreements, and a 30-question welfare survey completed by 44 PALM workers. Key findings showed that although no recruitment fees were charged, workers were responsible for initial costs including passports, medical checks, and police clearances. These costs were later reimbursed to HealthX through payroll deductions, with most workers indicating they understood and agreed. However, some expressed confusion about the final amounts and the timing of disclosures.

Workers generally rated their experience positively, citing supportive workplaces, clear training, and accessible complaint pathways. However, gaps were identified in cost transparency, role clarity - particularly around household model duties - and communication around payslips and rosters. A small number of workers reported employment issues, which were resolved upon escalation. HealthX provides information and induction sessions to workers, in line with their obligations as a PALM Approved Employer. Uniting and HealthX are collaborating to identify ways to make communication with PALM workers as clear as possible during recruitment.

Uniting also conducted follow-up interviews with workers who expressed a willingness to deepen Uniting's understanding of the issues raised, ensuring their voices inform future action plans. These insights will guide improvements in supplier engagement, worker onboarding, and risk mitigation strategies across our aged care services. However, no issues relating to modern slavery were identified during the survey or the follow-up interviews.

PALM scheme audit: Qualitative responses about PALM workers' overall experience in Australia

Do you have any other comments about your experience in Australia?

My experience in Australia has been rewarding both personally and professionally. I've learned a lot, grown in my role as a carer, and had the chance to work with a diverse and supportive team.

Life is expensive and challenging, however it is a beautiful country that one would never regret staying in.

Good - and job well done.

I just want to thank the employer for this opportunity, providing me a job to come to Australia.

Thank you Australia for this opportunity - provided me a visa to come and work.

I am very privileged that I was given the opportunity to come over and work in your country.

I have gained more knowledge, experience and equipped myself with new skills that I for sure will take back with me and share my knowledge in my country.

My family and I are very grateful that for these past 3 years I was able to accomplish what I came here for financially, and that whatever money I've been sending home has been put to good use.

Great country to work in. Workers are being looked after very well. We learn a lot of new things.

Yes, good experience with the use of lifters, hoist, walker. Always follow manual handling procedure. Policy and procedures of Uniting.

So far so good.

I generally feel safe here in Australia. Neighbourhoods are peaceful, fairness and rights, healthcare is generally good and moving here has made me become more independent and confident. Overall, I'm grateful for the opportunities Australia has given me.

If only I could have more time to work in Australia.

I've grown to love this country and experienced so much while living here. The food, lifestyle, and people, different cities, as well as train rides, and so much more. I enjoy working here, and the pay is good.

Awesome.

It has been great getting to know people and experience the new work environment.

Industry approach - other Uniting entities

Uniting is now planning a joint approach with other Uniting entities (UntingCare QLD, Wesley Mission NSW, Wesley Mission QLD, Eldercare, Agewell and Uniting Communities) to strengthen due diligence across shared supplier networks.

To strengthen our collective response to modern slavery risks, Uniting is designing an **online awareness training module specifically for suppliers**. This module explains what modern slavery is, highlights common risk indicators, and provides practical steps businesses can take to identify and address risks within their operations and supply chains. It also reinforces our expectations under the Supplier Code of Conduct and the Modern Slavery Act 2018.

The training will be accessible via a secure online platform and includes guidance tailored for small and medium-sized enterprises, where formal policies may not yet be in place. By offering this resource, we aim to build capability, promote ethical practices, and foster a culture of transparency and accountability across our supply chains.

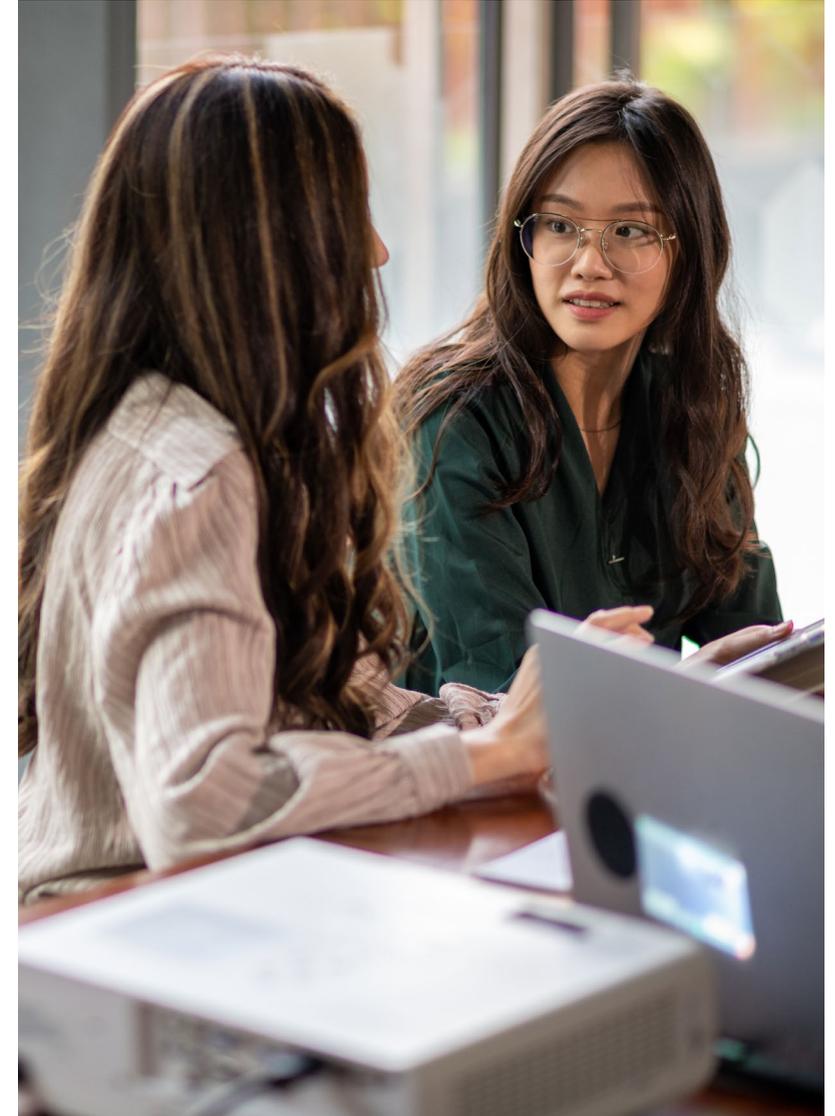
It is anticipated that this online module will be rolled out in 2026.



Development of a Modern Slavery Risk Register

In FY24, Uniting developed a protocol for collaborating with suppliers when modern slavery was suspected or identified. This protocol adopted a tiered approach based on the perceived level of risk, with higher risks closer to Uniting's operations receiving greater scrutiny.

In FY26 we are adapting and improving our approach by developing a dedicated Modern Slavery Risk Register. This tool provides a structured framework for capturing potential risk events across our operations and supply chain, assessing their likelihood and impact, and assigning clear ownership for mitigation actions. By prioritising high-risk areas and monitoring progress, the register ensures transparency, accountability, and timely escalation of critical issues. It is designed to support collaborative workshops with risk owners and control owners, enabling a shared understanding of risks and effective treatment strategies.



Measuring the effectiveness of our actions on modern slavery

Measurement criteria

We regularly assess the impact of our initiatives to ensure they are reducing modern slavery risks across our operations and supply chains. Our approach combines governance-level reviews with operational monitoring. Each year, our action plan and due diligence processes are evaluated by executive and board committees, while Procurement, HR, and risk teams track progress at an operational level. Key indicators include:

- Completion rates for modern slavery awareness training among employees.
- Improvements in our risk profile as measured by independent assessments such as the iPRO tool.
- Growth in the number of suppliers assessed for their modern slavery risks.
- Timely completion of actions outlined in our roadmap.



We also conduct deep dives into high-risk categories and provide feedback to suppliers to strengthen their practices. This continuous improvement model ensures accountability and transparency, aligning with the Modern Slavery Act 2018 and our commitment to ethical sourcing.

| EFFECTIVE CRITERIA | END 2020 | END 2022 | END 2025 | WHERE WE WANT TO BE BY END 2027 |
|--|---|---|---|---|
| Modern slavery awareness training |  |  |  |  |
| The identification and improvement in our modern slavery risk profile |  |  |  |  |
| Increase in the number of top suppliers whose risk profile has been assessed |  |  |  |  |
| Completion of actions identified in our action plan |  |  |  |  |
| Complete deep dives of our highest risk categories (e.g. property) | | |  |  |
| Improvements in our risk profile based on independent assessments | | |  |  |

Uniting is proud of the significant work undertaken in our 5th reporting period. We are committed to building upon the foundations already laid, identifying future risks in our supply chains, and working with the Australian procurement industry to support the development of effective processes that contribute to eradicating modern slavery.

About Uniting

Uniting NSW.ACT contributes to the work of the Uniting Church in NSW and the ACT, through community services, spiritual care, social justice and advocacy.

We provide services for people through all ages and stages of life, and drive solutions to systemic issues so people experiencing disadvantage can live their best lives.

Our purpose is to inspire people, enliven communities and confront injustice.

We value diversity and always welcome everyone exactly as they are.

Get in touch

1800 864 846

ask@uniting.org

uniting.org



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