

Disclosure Note

This Modern Slavery Statement (Statement) has been produced on behalf of The Catholic Archdiocese of Melbourne (CAM). This modern slavery statement is a joint statement made on behalf of the following three reporting entities all of whom share the Archbishop Peter A Comensoli as the principal stakeholder.

<https://melbournecatholic.org/modern-slavery-statement>

In the Statement we will refer to the "Catholic Archdiocese of Melbourne (CAM)", as a single name reference to include agencies. This statement does not cover Villa Maria Catholic Homes (VMCH). VMCH have produced a separate Modern Slavery Statement for 2023.



About CAM, MACS, and CDF

This modern slavery statement is a joint statement made on behalf of the following three reporting entities all of whom share the Archbishop Peter A Comensoli as the principal stakeholder.

All the 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

Mission and Strategy

CAM	MACS	CDF
<p>Archbishop Comensoli: <i>“We seek to live the Gospel of Jesus Christ and plant the seeds of that faith that was given to us into our local communities. Those communities are made up of our parishes, schools, hospitals and social service organisations; and all those many communities, groups and movements that are a part of our local Church.”</i></p>	<p>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).</p> <p>“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).</p> <p>This relationship elicits a desire to grow in the knowledge and understanding of Christ and his teaching.</p> <p>With parents and parishes, Catholic schooling seeks to fulfil this mission by providing an environment in which students are enabled to:</p> <ul style="list-style-type: none">• Encounter God in Christ and deepen their relationship with him.• Pursue wisdom and truth encouraged by a supportive academic culture.• Grow in the practice of virtue, responsible freedom and serving the common good. <p>to. Atg e to t w 1 ss, \$M m gra t</p> <p>MACS released its inaugural Strategic Plan 2030: Forming Lives to Enrich the World in August 2022.</p> <p>At the heart of the strategy is MACS’ purpose: ‘Forming lives of faith, hope and love in the light of Jesus Christ’ and vision: ‘“ gurat t</p>	

CAM	MACS	CDF
<p>The organisational structure of the Catholic Archdiocese of Melbourne is displayed in Criteria 7, Figure 1, page 25.</p>	<p>The organisational structure of Melbourne Archdiocese Catholic Schools is displayed in Criteria 7, and Figure 2, page 25.</p>	<p>page 25. MA t heli Is is g acc</p>
<p>Our work is organised into different entities and agencies.</p>	<p>MACS Office and the Catholic Leadership Centre is based in East Melbourne.</p>	
<p>This structure provides clear responsibilities and accountabilities, and it also dictates our governance structure.</p>	<p>It is supported by pag i</p>	<p>adst ce a u h</p>

Profile and operations

CAM	MACS	CDF
Throughout the 2023 reporting period, CAM engaged with 1156 suppliers with a total expenditure of \$36.39M.	MACS total income for the reporting period was \$2,349.50M. The main expenditure being \$1,622.12M on the salaries of employees. Other expenses totalled \$669.34M.	<p>The CDF has an annual revenue \$59.20M and expenditure of approximately \$7.70M excluding the salaries of its 56 staff.</p> <p>In its operations, the CDF engages principally with other Catholic entities and banks.</p>

The main categories of expenditure across CAM, MACS, and CDF were in the following areas:

- Staff costs (salaried employees)
- Building and construction
- Cleaning and security services
- Facility management and property maintenance
- Events and event management
- Furniture and office supplies
- ICT Hardware
- Uniforms and PPE
- Food and catering services
- Waste management services
- Finance, investment, and portfolio positions
- Labour hire

Summary of 2023 activities

Throughout 2023, CAM, MACS, and CDF continued participation in the Australian Catholic Anti-Slavery Network modern slavery risk management program (ACAN Program). The ACAN Program provided CAM, MACS, and CDF staff access to monthly webinars and e-newsletters, tools and templates, guidance materials and supplier engagement activities.

Other actions completed in 2023 by all three reporting entities include:

- The continuation of standard procurement practice to invite suppliers to join Sedex (Supplier Ethical Data Exchange), an on-line system that allows suppliers to maintain data on ethical and responsible practices and allows suppliers to share data with customers; and
- The acceleration of collecting supplier engagement data.

In addition to these activities, MACS also undertook the following:

- Included modern slavery requirements into the standard MACS market engagement documents.
- Tender evaluations now include a tenderers completion of a modern slavery risk assessment as a scored criterion.
- The supplier set up and onboarding process has been strengthened and suppliers must complete a modern slavery risk assessment.
- Suppliers in high-risk categories are required to pass the modern slavery assessment and register their compliance

Modern slavery risks in operations and supply chains

Supply Chain Risk

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

The supplier categories assessed as high risk, include:

- Building and construction
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Modern slavery risks associated with MACS have been identified in multiple spend categories using the ACAN

Analysis of CDF supply chains is based on ACAN risk taxonomy across 41 categories of geographic location, industry or sector, commodity, product category and workforce profile.

The supplier categories assessed as high risk, include:

- 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
- Labour Hire
- Waste Management services

When engaging suppliers to deliver operational services, CDF tries to establish and maintain long-term relationships and to build trust and transparency.



High

Medium

Low

Undefined

Operational Risk

Through the ACAN Program, CAM and CDF continue to focus activities with suppliers of labour, and the operational risk associated, in the following high-risk labour supply chain areas.

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 such as China and Vietnam.

The labour force used in facilities management generally consists of temporary migrant workers often contracted through labour hire companies.

BGIS supply Facilities Management and Property Services to CAM. As such, there are inherent modern slavery risks associated with the use of Australian based sub-contractors (and their sub-contractors/suppliers) and the overseas supply chain of materials and equipment.

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.

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 like 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.

Actions Taken to Assess and Address Risk

For the 2023 reporting period, CAM, MACS, and CDF participated in the ACAN Program for assessing and addressing the risk of modern slavery within each respective organisation and followed the following supplier engagement plan:

- Identification of suppliers in high-risk procurement areas via ACAN Procurement Taxonomy.
- Suppliers in high-risk categories were invited to complete the ACAN Supplier Survey.
- Suppliers were assisted with the process to join Sedex and provided support to complete the Sedex Self-Assessment Questionnaires (SAQ).
- ACAN Program Managers then assessed the SAQ results, identified gaps in the supplier's management system such as further training and capacity building areas and the development of risk management strategies.

The ACAN supplier engagement plan identified common suppliers shared across multiple Catholic entities within ACAN. As a result, this data increased leverage and reduced duplication of supplier engagement from multiple Catholic entities.

An important part of the supplier engagement plan included an invitation to suppliers from CAM, MACS, and CDF to attend the 2023 ACAN webinar series. The purpose of t

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CAM, MACS, and CDF intend that Sedex will be further utilised during 2024 to:

- Manage the risk of modern slavery with existing suppliers.
- Validate inherent risk against actual risk.
- Screen new suppliers as part of tenders and supplier on-boarding processes.
- Gain visibility further upstream in the supply chains.
- Monitor and report on progress in the profile of suppliers.

E-learning provides an important framework and foundation for the ACAN modern slavery risk management program.

CAM, MACS, and CDF will incorporate the ACAN e-learning modules into their internal Learning Management System to provide greater oversight and accountability.

The ACAN modern slavery modules are summarised as follows:

- **Module 1:** Modern Slavery 101 (MS101)
- **Module 2:** Business Relevance
- **Module 3:** Implementing a Modern Slavery Risk Management Program
- **Module 4:** Grievance Mechanisms and Remedy

CAM, MACS, and CDF intend to provide appropriate and timely remedy to people impacted by modern slavery in accordance with the UN Guiding Principles on Business and Human Rights, Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities, and other relevant Australian laws.

The remedy includes providing for, or cooperating in, actions to address harms to people and to mitigate future risks if CAM, MACS, and CDF are found to have caused or contributed to modern slavery.



Action	Timeframe	Status
Management Systems		
Include assurance activities in new MACS assurance plan including checks in supply chain/suppliers/contractors for Modern Slavery compliance.	2024	In progress
Develop a governance structure that clearly defines role, responsibilities, and accountability for ethics compliance and modern slavery risk management across MACS.	2024	In progress
Risk Management		
Implement comprehensive set of measures to manage business ethics risks within MACS.	2024	In progress
Update Enterprise Risk Register, and all risk register templates to include Modern Slavery more prominently as an independent risk.	2024	In progress
Procurement and Supply Chain		
Utilise the ACAN Program's resources to initiate a detailed supply chain risk assessment, focusing on modern slavery risks. This includes integrating ACAN Supplier Survey results to identify and engage Tier 1 suppliers for Sedex membership and onboarding them onto the Sedex platform. By facilitating transparency and collaboration, the Procurement Team can more effectively manage supplier risk and enhance ethical procurement practices.	2024	In progress
Embed modern slavery considerations into all stages of the procurement process, from requests for proposals (RFx) and tender evaluations to contract awarding and management. Ensure that contracts include clear modern slavery clauses and compliance requirements. This activity will help establish ethical procurement practices and ensure that modern slavery risks are addressed throughout the procurement lifecycle. Currently undertaking in recruitment agency tender project.	2024	In progress
Human Resources and Recruitment		

Action	Timeframe	Status
Management Systems		
Continue to develop policies, principles, and processes, and integrate these into management tools.	2024	In progress
Work to integrate anti-slavery into governance structure and define metrics to measure, manage, enhance reporting capabilities, and develop KPIs.	2024	In progress
Risk Management		
Continue working with partners to update risk management framework and define how to measure and understand risk in operations and supply chains.	2024	In progress
Develop a process to periodically review and update the risk management framework, as understanding of modern slavery risk matures.	2024	In progress
Procurement and Supply Chain		
Inform suppliers of anti-slavery measures, including updated contract clauses, supplier code of conduct and tender requirements.	2024	In progress

Measuring Effectiveness

During 2024, CAM and CDF will be committed to continually improving our approach partnering with our stakeholders and working to reduce modern slavery.

The CAM Action Plan is structured around the five risk categories analysed with the Action Plan proposing specific initiatives across the categories, as well as annual recurrent actions.

CAM is progressing to identify and mitigate modern slavery risks in our practices and understands this is an ongoing process. We seek to continuously refine and improve our approach to manage Modern Slavery Risks effectively and transparently.

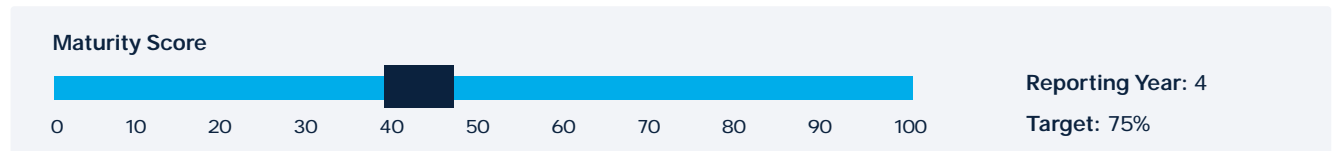
In 2024 the CAM priorities are to:

- Continue to improve in the support and guidance we provide to our suppliers/contractors during our assessment.
- Continue to expand our training programs for staff and increase awareness of Modern Slavery risks, particularly to staff engaged in 3rd party purchasing activities and contractor engagement.
- Form a new Modern Slavery Working Group and appoint members to the group.
- Identify a Modern Slavery Liaison Officer (MSLO).
- Inclusion of modern slavery clauses in standard contract templates.

MACS

MACS has completed an assessment of its maturity in relation to modern slavery. The assessment revealed several opportunities to strengthen the modern slavery risk framework. The summary of maturity assessment follows.

Melbourne Archdiocese Catholic Schools - Overview



Melbourne Archdiocese Catholic Schools - 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	62%	54%	38%	35%	47%
2. Operations	55%	25%	25%	19%	31%
3. Supply chain	68%	80%	35%	44%	57%
4. Worker engagement	14%	62%	22%	22%	30%
5. Entity's program and activities	100%	30%	50%	38%	55%
6. Grievance mechanisms and remediation	78%	60%	57%	38%	58%
Average	63%	52%	38%	33%	46%

The MACS MSWG are scheduled to meet several times during 2024 with priorities to:

- Discuss the gap assessment results with a particular focus on the low percentage scores.
- Progress the tasks outlined in the MACS Modern Slavery Action Plan.
- Prepare content for the 2024 statement.
- Look ahead to 2025 in terms of further actions to improve future gap assessments.

Effectiveness Assessment

During 2024 and beyond, CAM, MACS, and CDF will continue to use its Sedex membership to improve visibility and reporting into supply chains.

The Sedex membership, as well as additional efforts to build anti-slavery capacity with suppliers and staff, will significantly reduce risk of being directly linked to modern slavery, lower the risk of directly causing modern slavery, and diminish the risk of indirectly causing modern slavery.

A key priority is the enhancement of reporting capabilities, metrics, and development of Key Performance Indicators (KPIs). KPIs will continue to be developed by CAM, MACS, and CDF. To support the development of KPIs, baseline



Consultation

CAM, MACS and CDF anticipate that our consultation process will continue to develop in future reporting periods.

CAM consulted with different departments including People & Culture, Property & Infrastructure and Finance when preparing this statement.

MACS has consulted widely with their subsidiaries, their MSWG and departments, such as Procurement, Legal, Communications, Risk, Compliance, People and Culture, and Finance teams, when preparing this statement.

CDF consulted with CDF Risk officers and different departments within CDF such as IT, Marketing and Client Services when preparing this statement.

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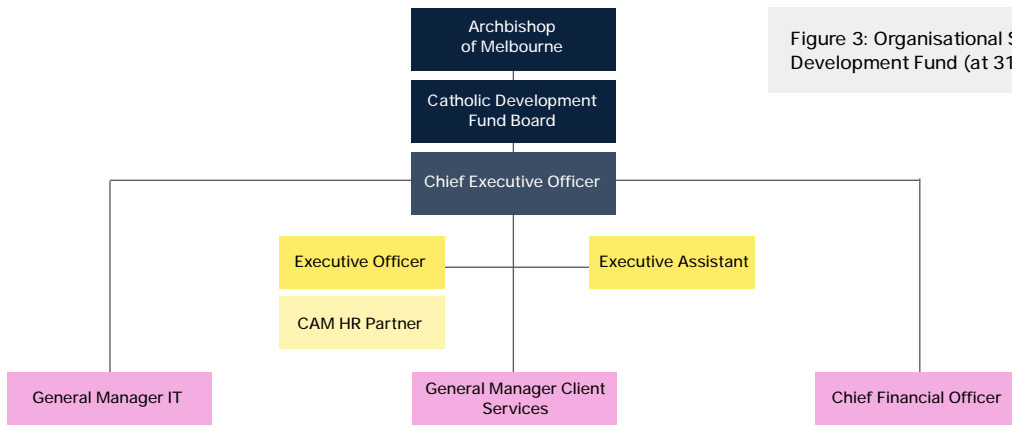


Figure 3: Organisational Structure of Catholic Development Fund (at 31 December 2023)

