

## Introduction

Melbourne Archdiocese Catholic Schools Ltd (MACS) and its subsidiaries recognise that people who are trapped in modern slavery are often manipulated in schemes that do not allow them to escape, ask for help or gain an understanding that they are victims of criminal activity.

This policy ensures that modern slavery does not have the opportunity to flourish within MACS, its subsidiaries, business relationships and extended supply chains. It provides a robust framework to ensure compliance with the reporting requirements of the *Modern Slavery Act 2018 (Cth)*. MACS is contributing to the prevention, and by 2030, eradication to the maximum possible extent, of modern slavery by managing and mitigating modern slavery risk within our operations and supply chains.

## Purpose

This policy is to prevent and mitigate the risk of modern slavery within MACS operations and supply chains.

## Scope

This policy applies to:

- all MACS board directors, executives, employees, volunteers and other Workers (**Staff**) working in MACS offices, MACS schools, including school boarding premises operated by MACS schools, and MACS subsidiaries, Melbourne Archdiocese Catholic Specialist Schools Ltd (MACSS) and Melbourne Archdiocese Early Years Education Ltd (MACSEYE)
- suppliers and business partners for MACS and its subsidiaries and their associated entities
- new suppliers and business partners that wish to conduct a business relationship with MACS and its subsidiaries.

## Principles

Catholic social teaching calls for the dignity of work, the rights of workers and advancing the common good. These core principles underpin this policy.

Slavery is a major issue for Australian businesses within Australia and in extended supply chains.

MACS will not knowingly use or contribute to modern slavery practices in any form.

MACS will actively work to identify and eliminate modern slavery practices from our operations, business partnerships and supply chain.

Any form of exploitative treatment, punishment, abuse of labour rights, coercive control (physical, mental, psychological or financial) of workers in MACS, its schools or subsidiaries operations or supply chains is unacceptable.

MACS shall comply with all relevant laws and regulations regarding worker recruitment, remuneration, working conditions and freedom of association.

MACS final purchasing decisions shall not be based on price alone. Ethical business processes are an essential part of our value for money and 'fit for purpose' considerations. This includes consideration of worker living wage mechanisms and responsible recruitment of workers.

MACS will continue to support our suppliers and business partners to assess and address modern slavery risks and take action to improve transparency, traceability and accountability for modern slavery practices and impacts in our collective supply chains.

# Policy

## 1. Prevention and management of modern slavery risk

1.1. MACS' modern slavery risk management program is underpinned by ethical business practices and in consideration of all our stakeholders, including:

- 1.1.1. people who are at risk of modern slavery practices
- 1.1.2. people who experience modern slavery practices.

# Definitions

## **Modern slavery**

Modern slavery describes situations where offenders use coercion, threats or deception to exploit victims and undermine their freedom. Practices that constitute modern slavery include:

- human trafficking
- slavery
- servitude
- forced labour
- debt bondage
- forced marriage

## WorkSafe legislation

Further information is available on the WorkSafe Victoria website: [WorkSafe Victoria - Define a Worker](#).

## Volunteer

A person who performs work without remuneration or reward.

## Related policies and documents

### Related MACS policies and documents

Code of Conduct for MACS Staff  
Procurement and Contract Management Policy  
Whistleblower Policy

## Resources

[Modern Slavery Act 2018 \(Cth\)](#)  
[Ministerial Order 1359 – Implementing the Child Safe Standards](#)

## Policy information

|                                 |                               |
|---------------------------------|-------------------------------|
| <b>Responsible director</b>     | Director, Finance and Digital |
| <b>Policy owner</b>             | General Manager, Procurement  |
| <b>Approving authority</b>      | MACS Board                    |
| <b>Assigned board committee</b> | Board                         |
| <b>Approval date</b>            | 1 July 2024                   |
| <b>Risk Rating</b>              | Extreme                       |
| <b>Review by</b>                | September 2025                |
| <b>Publication</b>              | MACS website, Gabriel CEVN    |

| POLICY DATABASE INFORMATION |   |
|-----------------------------|---|
| <b>Assigned framework</b>   | Financial   |
| <b>Supporting documents</b> | See list of supporting documents and related policies above |
| <b>Superseded documents</b> | Anti-Slavery Policy – v1.0 – 2021                           |
| <b>New policy</b>           |   |