

Modern Slavery Statement

1 January to 31 December 2023

Villa Maria Catholic Homes Ltd ABN 32 004 364 103

VMCH



Chair's introduction



At the core of VMCH's Catholic values is its commitment to assisting the poor and marginalised, particularly those people living with a disability and older people. It is our responsibility as an ethical provider, that we are deeply committed to ensuring the welfare and dignity of all individuals associated with our services. VMCH recognise the unfortunate reality of modern slavery and understand that our sector is not immune to such practices. These can manifest in various forms, including forced labour, exploitation of migrant workers, and unfair employment practices.

We categorically condemn all forms of modern slavery and are committed to implementing rigorous measures to ensure that such practices have no place in our operations or supply chains. We strive to maintain transparency, fair labour practices, and respect for human rights at all levels of our organisation.

Our commitment extends beyond mere compliance with legal obligations. We believe in the inherent dignity and sacredness of every individual and are dedicated to upholding it. We will continuously review and update our policies and procedures to combat Modern slavery, provide necessary training to our staff, and work collaboratively with our partners to promote ethical practices throughout the sector.

This Statement is our fourth public regulatory disclosure specifically addressing modern slavery in line with the requirements of **Modern Slavery Act 2018 (the Act)**. We have always been committed to improving the rights and wellbeing of people across our operations.

In 2023, the Board continued its commitment to the eradication of modern slavery through the risk appetite statement which sets the tone for risk. We have no appetite to engage in, or engage with, any form of modern slavery. It therefore continues to take a leadership

position and clearly and unequivocally states the position for all within the organisation. This position is also reflected in our policies, procedures, and practices.

We do not tolerate behaviour that is in breach of the law, which is non-compliant with our policies, or which does not align with our ethical values. We expect our employees, contractors, volunteers, and suppliers to operate in a manner which is consistent with our values and standards. This Statement sets out the steps we have taken in 2023 to identify and address modern slavery within our operations and supply chains. Our approach includes a commitment to continuous improvement as we continue our education and awareness of modern slavery risks.

This Statement has been prepared and reviewed by VMCH's Modern Slavery Working Group, the VMCH Executive and the Board's Quality Compliance & Risk Committee and approved by VMCH's Board on 1 May 2024.

We are pleased to be part of the Australian Catholic Anti-Slavery Network (ACAN) and acknowledge the support ACAN has provided in developing VMCH's modern slavery mitigation plans.

This Statement is submitted as part of the ACAN compendium, consequently this report is for activities to the year ending 31 December 2023.

Together, we can make a difference and contribute to the eradication of modern slavery.

A handwritten signature in black ink, appearing to read 'Julien O'Connell'.

Julien O'Connell A.O.
VMCH Board Chair

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1

Criteria 1 and 2: The Reporting Entity and our Structure

The reporting entity covered by the Statement is Villa Maria Catholic Homes Ltd (ACN 004363103) (VMCH). VMCH is a not-for-profit company limited by guarantee. VMCH's registered office is Level 3, 486 Albert Street, East Melbourne, Victoria.

1.1 About VMCH

VMCH is a Catholic profit for purpose organisation, providing services to over 10,000 people across Victoria. Our Mission is to continue the caring ministry of Jesus by creating choices, offering hospitality, and building inclusive, compassionate, sustainable communities. We are especially committed to supporting people who are disadvantaged and marginalised.

We strive to be a Catholic leading provider of high-quality disability, specialist education, residential and aged care and retirement living services. Our values of love, joy, hospitality and courage are not just words to us, they guide us in everything we do.

In accordance with our values, we are committed to respecting and promoting human rights, which includes the commitment to work to eradicate the many forms of modern slavery that exist. We aim to ensure that decisions made by VMCH do not allow modern slavery to continue within our operations, business relationships and extended supply chains.



1.2 Living our Vision and Mission

We aim to be recognised as a transformative leader in the provision of exceptional care, services, and accommodation. Fulfilling the caring ministry of Jesus, we are committed to creating genuine places of belonging, through service and compassion for all aged, disadvantaged and people with disability.

As a Catholic organisation we observe the teachings and practices of the Catholic Church by celebrating the life of individuals and their communities as expressed in their physical, social, and spiritual well-being.

Our Values

bringing
Love

We foster connections and show compassion for one another with kindness and respect.

creating
Joy

We create a culture of happiness and positivity, celebrating life and the uniqueness of all.

embracing
Hospitality

We welcome all to our community, bringing comfort and a sense of belonging.

showing
Courage

We do what is right, regardless of our fears, the challenges or consequences.

1.3 2023 Modern Day Slavery Risk Management Initiatives

In 2023, we continued our work on increasing awareness through communication, online learning and developing a network of champions throughout the organisation. We also partnered with other Catholic entities within our ACAN network to better tackle supplier engagement. We found that by teaming up with other Catholic entities we could better leverage our collective purchasing spend, share resources, and coordinate action to manage our risk. We implemented several initiatives and reached some key milestones by adopting this approach. These are summarised below.

- Continued membership of ACAN to leverage best practice materials and approaches.
- Further roll out of the modern slavery online training to employees to raise awareness of risks, and how to identify and confidently report incidents.
- Any new tenders (including request for tenders and requests for proposals) included a mandatory compliance requirement that the tenderer comply with VMCH's Modern Slavery Policy as part of the final agreement.

- Continued to bring together the network of modern slavery champions for discussion and presentations regarding modern slavery to improve awareness and engagement on of modern slavery within our organisation. Guest speakers presented to the modern slavery champions to ensure experiences from others was part of the learning process for VMCH.
- Considered further the overall work of VMCH including modern slavery within an ESG framework. Thereby recognising the interrelationship between modern slavery, environmental (including climate change) social and governance activities.
- Worked with other ACAN Members in similar industry and try and leverage our collective buying power to engage more suppliers onto Sedex.



1.4 Our plans for 2024

VMCH is steadfast in its commitment to take action along the path to identify and mitigate modern slavery risk. Our plan for 2024 is to focus on three key priorities:

i) We will be an Ethical Employer

To be an ethical employer, improve standards for staff at VMCH and provide a decent, fair, and safe place to work.

We will also invest in our staff offering training opportunities in literacy providing tools to staff to provide independence particularly for our staff from non-English speaking backgrounds.

ii) We will consider where our products and services come from and demand they've been made free from exploitation

Use our influence and leverage to improve standards for people working in our supply chains, ensure they have a decent, fair, and safe place to work and tackle worker exploitation where we find it. We will actively look to work with more Australian based suppliers and review our linen contract.

iii) We will increase transparency and understanding across VMCH and externally

To continue to work transparently and collaboratively across VMCH to better identify modern slavery risk, encouraging staff and volunteers to report any concerns they observe.

We will continue to reinforce and further build on previous year's actions of VMCH's modern slavery programme in:

- **Governance** – continue to develop the governance around our modern slavery programme so it holds the right people to account and drives continuous improvement and the completion of our modern slavery strategy. This includes developing our ESG framework and plan.

- **Policies** – ensure our policies are up to date, fit for purpose and follow our Governance Framework.
- **Strategic Partnerships** – identify and work with appropriate external partners who can challenge, drive and support us in delivering our Modern Slavery Strategy and Programme.
- **Training and awareness** – ensure all VMCH staff, contractors and volunteers are aware of modern slavery risk, know the signs to look out for and how to respond to concerns.

Through these measures, we aim to create an environment that is free from modern slavery and promotes the dignity and respect of all individuals. We believe that by taking a proactive and comprehensive approach, we can make a significant contribution to mitigating modern slavery risk for VMCH.

Further Commitments for the future are highlighted in Section 6.

1.5 Organisational Structure and Operations

VMCH is proud to work in partnership with people of all ages and abilities to achieve their individual goals and dreams, remain connected to their communities and enjoy their independence. Our **3,020+** staff members are dedicated to supporting **10,000** people across metropolitan Melbourne, regional Victoria, and southern New South Wales. We offer a vast range of services including residential aged care, retirement living, affordable housing options, community and home-based senior support, disability support, carer support and education.

Our People

3,020+
staff supported
10,000
people



Mission

400+
volunteers



4
op shops and a warehouse

24
pastoral care practitioners
supported people
across over

40
sites including affordable
housing, aged care and
disability services

Retirement Living

578
retirement living
apartments/units
across



14
locations

416
people living in our
affordable homes across

22
locations

Residential Aged Care

1,077
people provided
homes in aged
care across




14
locations

102
people provided with end
of life care at O'Neill House

Disability Services

1,085
NDIS clients

61
students enrolled
at St Paul's College




3,109
carers supported

109
children who attend Early Learning
and Therapy programs

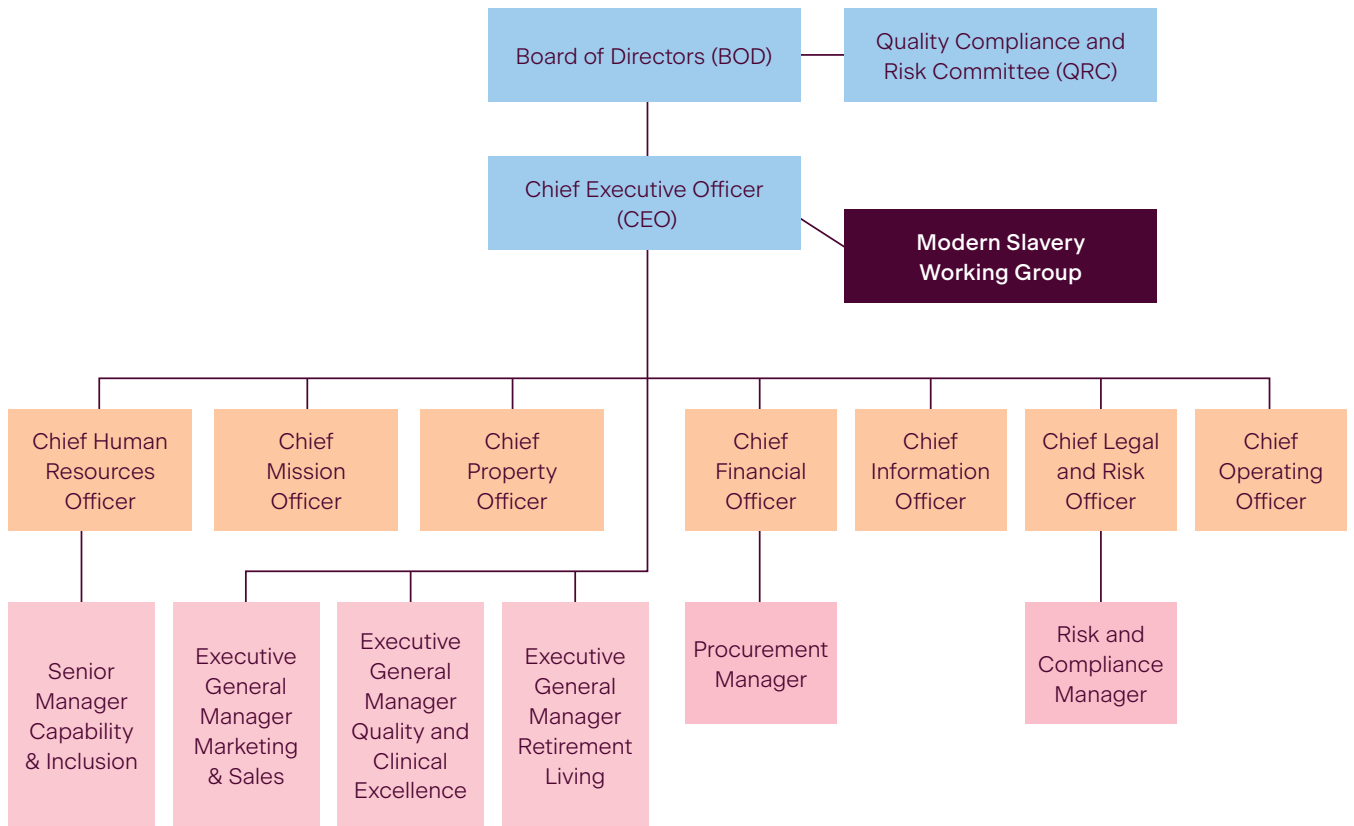
90
residents living in our
Shared Disability
Accommodation

At-Home Aged Care

3,255+
people supported
across metropolitan
Melbourne, regional
Victoria and southern NSW
with allied health, and in-home
and carer support



Organisational structure



Our structure includes a procurement function and a risk function which provide support to the operational areas. In 2023 we recruited a Capability and Inclusion manager that reports to our Chief Human Resources officer. This role provides expert advice and guidance, to our organisation by ensuring a strategic and consistent approach to the delivery of skills, jobs and increased diversity within the workforce and our supply chain.

1.6 Governance Structure

VMCH is governed by a robust structure that ensures the highest standards of care and allows for the mitigation modern slavery risk, including identification and reporting of modern slavery. The Board of Directors, with its diverse expertise, sets the strategic direction, including our commitment to identifying and mitigating modern slavery risk.

The Board has responsibility for ensuring a reporting culture and an enterprise risk management framework exists within VMCH.

The Quality Compliance & Risk Committee (QCR), assists the Board in its responsibilities relating to:

- Assessing the effectiveness of VMCH's overall risk management framework.
- Supporting a prudent and risk aware approach to decisions made within VMCH.

The QCR reviews a wide range of matters relating to Clinical Governance, Quality and Compliance frameworks. This includes all matters related to client care, safety and support and non-financial risks (including modern slavery risks) within which the organisation operates in accordance with VMCH's risk appetite and risk management framework. It also reviews the modern slavery risk as part of the overall risk management responsibilities.

The Board modern slavery commitment is operationalised, through policies and the delegations of authority, by our CEO and executive team, who implement policies, conduct training, and oversee day-to-day operations to ensure modern slavery risk is mitigated within our organisation or supply chains.

VMCH also has a modern slavery working party and modern slavery champions group that play a crucial role in monitoring compliance with these policies are the Modern Slavery working and champions groups. The objectives of these working groups are to:

- Provide input and advice to VMCH on issues related to modern slavery.

- Actively support the development and implementation of VMCH's modern slavery action plan.
- Assist VMCH in determining priority actions to be undertaken and establishing annual goals and targets.
- Monitor and review actions taken to assess and address modern slavery risks and evaluate their effectiveness, and;
- Ensure VMCH meets the requirements of the Modern Slavery Act 2018 (Cth).

Regular audits through our internal auditors are also conducted to identify any potential risks or instances of non-compliance within our policies and procedures of modern slavery.

Our governance structure therefore ensures accountability, transparency, and a commitment to the dignity and respect of all individuals associated with our services.

1.7 Our Strategic Plan

Modern slavery fits within the 2023 VMCH Strategic Plan, under the headings:

Effectiveness

- Excellent Board governance practices.
- Understanding and managing modern slavery risks.
- Implement ethical investment practices.

Clients

- Continued training and implementation of "knowing our people".

Mission

- Continued formation of staff through orientation, formation program, and dissemination of weekly reflections based on our values, screen savers highlighting Easter and Christmas with a focus of thinking of others. Continued investment in the formation of VMCH staff in our mission, vision and values and in the traditions of our catholic identity and heritage.

1.8 Supply Chain

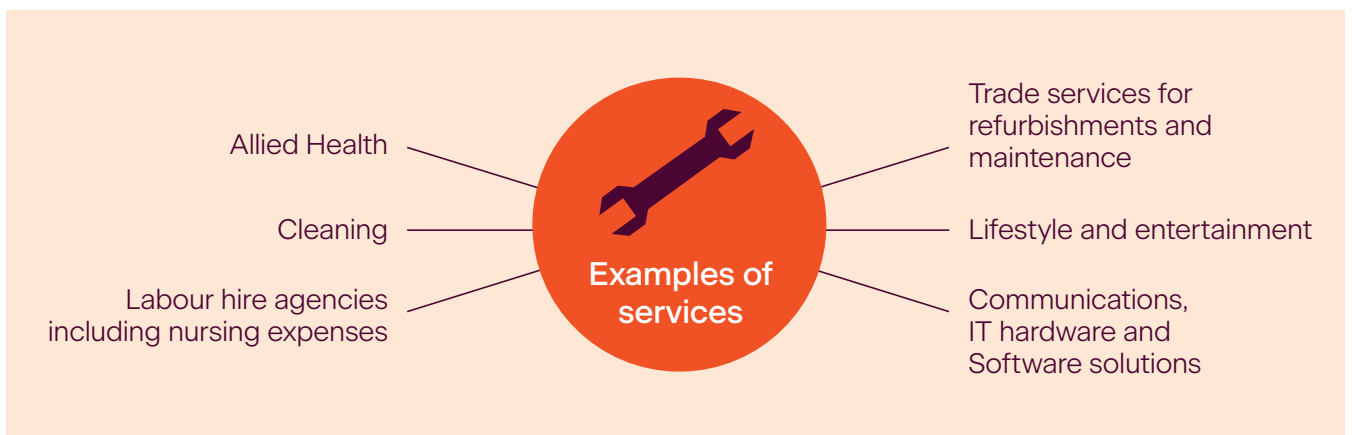
VMCH has **2,751** active suppliers, who supply a range of goods and services to enable VMCH to maintain our operations and provide excellent care to our clients, residents, and students. Greater emphasis has been made within our contractor space with more vigorous checks in place for hiring. VMCH also has a central system to store contracts for suppliers.

Our supply chain is diverse and encompasses small local businesses through to national and global businesses. We deal predominantly with suppliers with an Australian presence, and many have their head office in Australia. Examples of goods and services sourced are included in the table below.

Professional services are generally provided by locally based suppliers.

Our procurement team is working hard at trying to source all products, especially in our construction space from local suppliers.

Examples of what we source:



VMCH has a robust tender process in place to review our tenders for potential modern slavery risks. We start by conducting a thorough risk assessment of each tender, focusing on the nature of the work, the geographical location, and the labour practices involved.

We then scrutinise the supply chains of potential contractors, ensuring they have transparent labour practices and adhere to international human rights standards. We also require potential contractors to demonstrate their commitment to preventing modern slavery, which can include their policies, training programs, and reporting mechanisms. This rigorous approach ensures that our business practices align with our commitment to human rights and social responsibility.

2

Criteria 3: Identifying modern slavery risks in operations and supply chain

2.1 Modern slavery risk factors

Modern slavery risks may exist due to many factors. Risk indicators include the following:

- **Sector and industry risks:** Certain sectors and industries may have high modern slavery risks because of their characteristics, products and processes.
- **Products and services risks:** Certain products and services may have high modern slavery risks because of the way they are produced, provided or used.
- **Geographic risks:** Some countries may have higher risks of modern slavery, including due to poor governance, weak rule of law, conflict, migration flows and socioeconomic factors like poverty.
- **Entity risks:** Some entities may have modern slavery risks because they have poor governance structures, a record of treating workers poorly or a track record of human rights violations.
- **Indicators of modern slavery:** A combination of these signs may indicate a person is in a situation of modern slavery and that further investigation and assessment is required. Some groups may be at higher risk of being impacted by modern slavery, such as women and migrant workers.

2.2 Understanding modern slavery within VMCH's context

In 2023, VMCH continued to develop its understanding of modern slavery risk. We developed key processes to assess elevated modern slavery risk areas within our business supply chain, have meticulously reviewed and significantly transformed our tender process to ensure it aligns with our commitment to ethical practices and social responsibility. We also partnered with other Catholic networks to strengthen our approach to onboarding suppliers.

As part of our **protected disclosure whistleblower policy**, employees, volunteers, and the community are provided with effective mechanisms to identify and escalate concerns including those regarding modern slavery. VMCH continues to build knowledge and awareness of human rights issues among employees and volunteers and encourage them to voice concerns without fear of retribution and with full confidentiality, if required.

We continued our membership, with Australian Catholic Anti-Slavery Network (ACAN), <https://www.acan.org.au/>.

As part of ACAN, VMCH has accessed the work and resources made available by ACAN, this includes Sedex, training modules and having access to key speakers.

2.3 Modern Slavery Gap Analysis

We undertook a gap analysis in December 2022 and again in December 2023. This part of our commitment to continuing to analyse our work in the modern slavery area. The table below has the results of the gap analysis.

Our analysis revealed areas that require further attention. Although we initially believed we performed well in December 2022, upon further review, we acknowledged the need for additional planning in our business systems. Our commitment remains to achieve our goals in all other areas, aiming for a 5.0% over time.

		Dec-22		Dec-23		Change
		Score	Avg	Score	Avg	
Management Systems	Governance	4.0	3.8	4.5	3.4	↓
	Commitment	4.0		4.5		
	Business Systems	4.0		3.0		
	Action	4.0		3.0		
	Monitoring and Reporting	3.0		3.0		
Risk	Risk Framework	4.0	3.5	4.5	3.6	↑
	Operational Risk	4.0		4.0		
	Identifying External Risks	4.0		3.0		
	Monitoring and Reporting on Risk	2.0		3.0		
Procurement	Policies and Procedures	4.0	3.6	5.0	3.6	—
	Contract Management	4.0		5.0		
	Screening and Traceability	3.0		3.0		
	Supplier Engagement	4.0		3.0		
	Monitoring and Corrective Actions	3.0		2.0		
Human Resources	Awareness	4.0	4.0	4.5	4.0	—
	Policies and Systems	4.0		4.5		
	Training	4.0		4.0		
	Labour Hire/Outsourcing	4.0		3.0		
Stakeholders	Customer Attitude	3.0	3.5	3.0	3.3	↓
	Information Provision	4.0		4.0		
	Feedback Mechanism	3.0		3.0		
	Worker Voice	4.0		3.0		

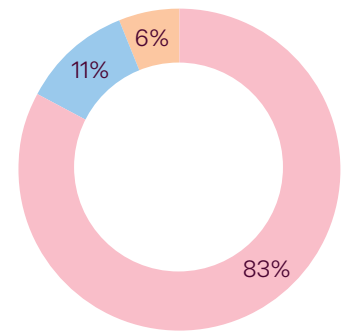
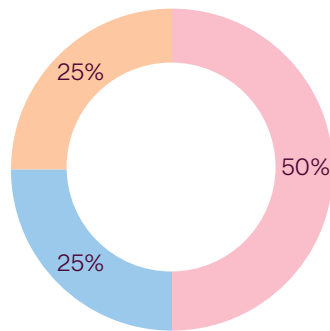
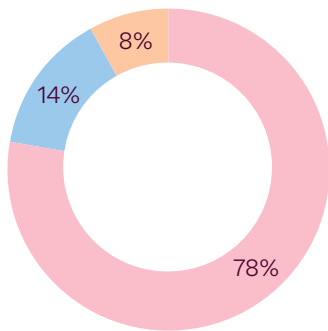
2.4 Operational and Supply Chain Risks

VMCH recognises that modern slavery risk may occur in our organisation and extended supply chain. Therefore, we monitor our supplier base for high-risk suppliers and categories to identify risk factors. VMCH analysed its top 50 suppliers (see the table below) and identified that of the top 50 spend suppliers, 39 were categorised as potentially high risk. The risk was assessed based on the supplier category.

There are four high risk categories highlighted:

1. Building and construction
2. Cleaning and Laundry
3. Direct Care & Services
4. Labour Hire and Recruitment (the risk within this category is labour hire using agency staff)

Risk by suppliers		Risk by categories		Risk by spend	
Number of suppliers	High risk suppliers	Spend by categories	High risk categories	Total spend \$	High risk suppliers
50	39	8	4	\$44,985,430	39



● High risk ● Medium risk ● Low risk

3

Criteria 4: Action taken to assess and address Modern Slavery Risks

Actions taken to assess and address modern slavery risks are outlined below.

3.1 Governance Framework

- VMCH continues to be a member of the ACAN with a modern slavery liaison officer (MSLO) representative. ACAN is a network of over 45 Catholic entities. VMCH's MSLO attended ACAN monthly meetings. These meetings aimed to understand the potential modern slavery risks and provide member organisations, including VMCH, with resources to assist in the modern slavery mitigation plans.
- The VMCH Board reviewed its risk appetite statement. Specifically, it included the Board's position on modern slavery, namely, that VMCH has no appetite to engage in, or engage with, any form of modern slavery.
- A Modern Slavery Working Party continued to meet, to provide input and advice to VMCH on issues related to modern slavery; actively support the development and implementation of VMCH's modern slavery action plan; assist VMCH determine priority actions to be undertaken and establish annual goals and targets; monitor and review actions taken to assess and address modern slavery risks and evaluate their effectiveness; and ensure VMCH meets the requirements of the Modern Slavery Act 2018 (Cth).
- The Modern Slavery Policy which, together with the Protected Disclosure (Whistleblower) Policy, Procurement Policy, Fraud and Corruption Policy, Employee Grievance Procedure, and Bullying and Discrimination Prevention Policy, provide a framework to ensure direct risks of modern slavery are effectively managed within our operations. Each of these has a continual review process into which finding and further treatments for modern slavery can be incorporated to ensure best practice.
- The ACAN supplier surveys were also completed by our suppliers and assessed by ACAN.
- The supplier code of conduct was in place.
- Continued work with the SEDEX tool (www.Sedex.com) to map our supply chain and assist in evaluating the risk of modern slavery within it. Sedex is a membership organisation that we have been able to access through our membership of ACAN. It provides an online platform to assist us in managing modern slavery risks within our supply chain.
- VMCH was part of the ACAN Health Working Group that considered procurement suppliers across the Catholic health sector to consider ways to encourage suppliers to join Sedex.

3.2 Contracts and Tenders

- Standard clauses regarding modern slavery are incorporated into all relevant agreements and are part of the standard tender materials VMCH now uses for its procurement activities.
- Our tender process includes the VMCH's Modern Slavery Policy, and any tenderer must accept and comply with the VMCH's Modern Slavery policy to be considered as part of the tender, along with agreeing and signing the Contractor Code of Code.

3.3 Training and Education

- Online training was developed with the assistance of ACAN and introduced into VMCH's online training portal for employees and volunteers. All the modern slavery champions have undertaken online training.
- Modern Slavery online training is included in the suite of modules directors are required to complete.
- Webinars and training were made available to suppliers.
- Webinars where leading experts on Modern Slavery presented about their experiences were accessed by suppliers and VMCH staff.
- The Modern Slavery Working Party took part in a training workshop to assist in engaging with suppliers.
- Monthly ACAN Working Webinars are attended by the Chief of Risk and Legal Officer and the Risk and Compliance Manager. These working webinars are facilitated by ACAN staff, topics covered are program updates, government updates, and guest speakers.
- Information is shared on VMCH's SharePoint to all staff on any changes in laws or regulations.
- Each meeting that the working group holds is opened with a prayer for St Josephine Bakhita patron Saint and acknowledgement of country.

3.4 Communication

- VMCH used its multiple communication channels/mediums with staff to raise awareness of modern slavery issues so that staff are informed about, and can be aware of, modern slavery issues. For example, on 8 February VMCH highlighted to all staff, through electronic media and thought for the week, the Feast Day of St Josephine Bakhita – the patron Saint of victims of modern slavery and human trafficking. On this day we pray for all those affected by these crimes, and the people that volunteer and work to eradicate them.

- Modern slavery champions were identified and came together as a group of staff who would be most likely to order goods or services and would need to be aware of, or identify, potential modern slavery issues.

3.5 Procurement and Operational Actions

- We recognise that due to the nature of VMCH's workforce characteristics and required skillsets, there are modern slavery risks within our operations. To mitigate this, we are working to reduce our reliance on agency staff use wherever possible.
- In 2023, there was a focused effort on reducing reliance on agency staff through the scheduling project. The project focused on reducing the level of agency used by each residential aged care site, instead encouraging the use of permanent staff. This means that staff are engaged by VMCH, which lowers our modern slavery risk associated with workforce characteristics.
- In addition, the nursing, aged care, and disability sectors are subject to industry enterprise agreements to ensure fair pay and working conditions for at-risk labour. Staff also have access to internal grievance mechanisms to voice any modern slavery concerns.
- There is a Procurement Hub on our intranet that all staff can access to assist them with all matters relating to procurement and contract management. Within this portal staff can access a preferred supplier list, the procurement policy, forms, and information about Modern Slavery.
- When hiring new employees, we are committed to hiring Australian citizens or people with appropriate working rights in Australia. We also ensure that our remuneration framework and enterprise agreements pay people at or above and in accordance with Australian employment laws.

3.6 Investments

- VMCH's Investment Management Policy and Procedures guide VMCH's investment strategy and sets out that investments will be made in a socially responsible manner that broadly reflects VMCH's values. To achieve this, VMCH has adopted a policy of excluding business activities and conduct is contrary to VMCH's values and the teachings of the Catholic Church, cause or perpetuate injustice or suffering, or infringe human rights. In addition, investment in companies is also excluded where their practices are unacceptable from a human rights or modern slavery perspective.
- Investment advisors must comply with VMCH's Investment Management Policy and Procedures when providing investment advice to VMCH.

3.7 Remediation Action

- VMCH is committed to providing appropriate and timely remediation to individuals affected by modern slavery in accordance with the need of the victim and relevant laws and guidelines, including the UN Guiding Principles on Business and Human Rights and the Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities. 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, has been established to provide remediation services and a confidential advisory service to individuals affected by modern slavery. Domus 8.7 will triage cases and refer victims to internal or external specialists who can provide support, advice and assistance regarding legal, social, and human rights responses to cases of modern slavery. It will also partner with international organisations to ensure supply chain remedial action and prevention is available. Additionally, Domus 8.7 will help build the capacity of Catholic social services and parishes to address the issues and risks of modern slavery, engage in policy advocacy and research, and engage with businesses and suppliers.
- Through Domus 8.7, VMCH aims to help individuals impacted by modern slavery to achieve outcomes that can be reported and used to continuously improve risk management and operational response. Any grievances related to modern slavery will be mediated through Domus 8.7, and VMCH is committed to working with any entity that caused harm to ensure remediation and prevention of recurrence. To recognise the causes of modern slavery and escalate poor labour practices and unsafe working conditions, both staff and stakeholders of VMCH are being equipped with the necessary skills to spot cases when they present themselves.
- Over the past year, VMCH did not find any cases of modern slavery in its operations and supply chains. This may have been due to the risk assessment still being too unspecific and in need of fine tuning. Once proper channels to identify victims are established and when suppliers are being probed in greater detail, this may change.

4

Criteria 5: Effectiveness Assessment

Our GAP analysis highlights the improvements and challenges we have as an organisation. We are more robust in our modern slavery policies and process and therefore have clear expectations with our suppliers, contractors and staff. We have strengthened our induction and onboarding processes and have now a resource dedicated to modern slavery.

VMCH will assess the effectiveness of the actions taken through a variety of review mechanisms including:

- Annual review of the effectiveness of our policies and procedures relating to modern slavery. These will be assessed on whether they are fit for purpose in the day-to-day aspects of the organisation and will be updated as required.
- Regular review and improvement of VMCH's due diligence processes as they relate to suppliers.
- Review of reported risks internally e.g., through the grievance or protected disclosure (whistleblowing) processes.
- A workplace engagement survey where employees can anonymously provide feedback about job satisfaction, working conditions, concerns, improvement ideas, etc.
- Regular review of suppliers.



5

Criteria 6: Describe the process of consultation with any other entities the reporting entity owns or controls

We do not own or control any other entities and therefore this criterion is not applicable.

6

Criteria 7: Other – Future Commitment

VMCH has outlined specific actions for 2024 that directly address the identification, management, and mitigation of modern slavery risks, our major project for the year is in our business systems area and integrating within our management tools ways to manage modern slavery holistically rather than silo based. We also need to address modern slavery more regularly at an executive level.

Some more specific actions are listed below:

- Continue to develop the governance around our Modern Slavery Programme so it holds the right people to account and drives continuous improvement and the completion of our Modern Slavery Strategy. This includes our commitment to our ESG framework and plan.
- Ensure our policies are up to date, fit for purpose and follow our Governance Framework.
- Identify and work with appropriate external partners who can challenge, drive, and support us in delivering our Modern Slavery Strategy and Programme. Further develop our metrics in developing our engagement with suppliers.
- Ensure all VMCH staff, contractors and volunteers are aware that Modern Slavery is happening, know the signs to look out for and how to respond to concerns.

The mandatory requirements under s 16 of the Modern Slavery Act 2018 (Cth) and the sections in this Statement that address the requirements are set out in the table below.

	Mandatory requirement	Where found in VMCH's statement
1.	Identify the reporting entity	Section 1: The Reporting Entity and our Structure
2.	Describe the reporting entity's structure, operations, and supply chains	Section 1: The Reporting Entity and our Structure
3.	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity	Section 2: Identify Modern Day Slavery risks in operations and supply chain
4.	Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes	Section 3: Actions taken to assess and address Modern Day Slavery Risks
5.	Describe how the reporting entity assesses the effectiveness of these actions	Section 4: Effectiveness Assessment
6.	Describe the process of consultation with any entities the reporting entity owns or controls	Not applicable to VMCH
7.	Provide any other relevant information	Section 6: Other – Future Commitment



More information

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