

Modern Slavery Statement

1 January to 31 December 2024

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 2024, 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 2024 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, and the Board's Quality Compliance & Risk Committee and approved by VMCH's Board on 28 May 2025.

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 2024.

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

Contents

| | |
|---|----|
| Chair's introduction..... | 2 |
| Contents..... | 3 |
| 1 Criteria 1 and 2: The Reporting Entity and our Structure..... | 4 |
| 1.1 About VMCH..... | 4 |
| 1.2 Living our Vision and Mission | 5 |
| 1.3 2024 Modern Day Slavery Risk Management Initiatives | 6 |
| 1.4 Our plans for 2025..... | 7 |
| 1.5 Organisational Structure and Operations | 8 |
| 1.6 Governance Structure | 10 |
| 1.7 Our Strategic Plan..... | 10 |
| 1.8 Supply Chain | 11 |
| 2 Criteria 3: Identifying modern slavery risks in operations and supply chain..... | 12 |
| 2.1 Modern slavery risk factors..... | 12 |
| 2.2 Understanding modern slavery within VMCH's context..... | 12 |
| 2.3 Modern Slavery Maturity Assessment | 13 |
| 2.4 Operational and Supply Chain Risks | 14 |
| 3 Criteria 4: Action taken to assess and address Modern Slavery Risks..... | 15 |
| 3.1 Governance Framework..... | 15 |
| 3.1.1 Supplier Engagement | 15 |
| 3.2 Contracts and Tenders | 15 |
| 3.3 Training and Education..... | 16 |
| 3.4 Communication | 16 |
| 3.5 Procurement and Operational Actions | 16 |
| 3.6 Investments..... | 16 |
| 3.7 Remediation Action | 17 |
| 4 Criteria 5: Effectiveness Assessment | 18 |
| 5 Criteria 6: Describe the process of consultation with any other entities the reporting entity owns or controls..... | 19 |
| 6 Criteria 7: Other – Future Commitment | 19 |

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. In 2024, VMCH's registered office was 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.



12 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.

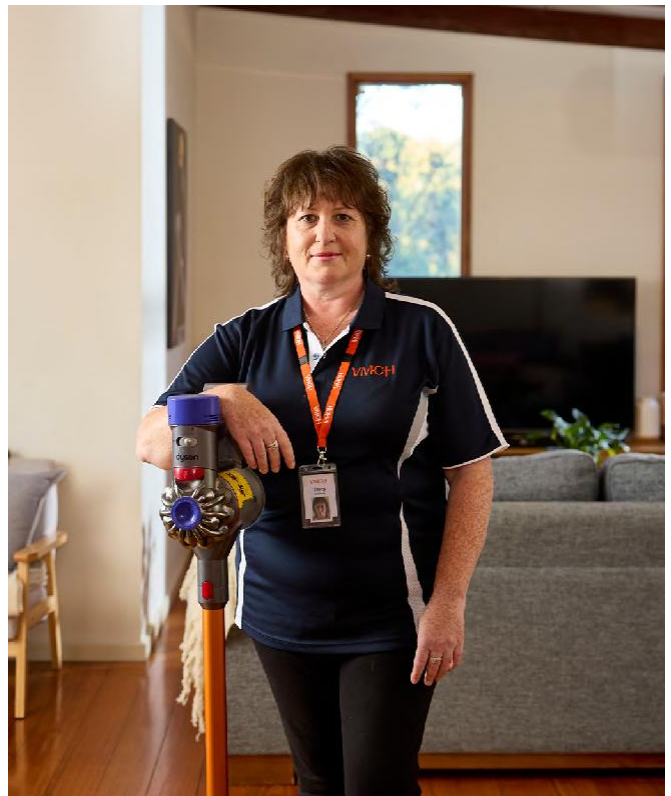
1.3 2024 Modern Slavery Risk Management Initiatives

In 2024, we continued our work of increasing awareness through communication, online learning and developing, we also partnered with other Catholic entities within our ACAN network to better tackle supplier engagement. We continued to implement initiatives to further our Modern Slavery awareness and mitigation journey.

These are summarised below.

- Continued membership of ACAN to leverage best practice materials and approaches.
- Modern slavery online training was available for employees to undertake 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 complies with VMCH's Modern Slavery Policy as part of the final agreement.
- We continued to use the Sedex platform to understand the modern slavery risks within our supply chain.
- Continued to bring together the network of modern slavery champions for discussion and presentations regarding modern slavery to improve awareness and engagement on the issue of modern slavery.
- Worked with other ACAN Members in similar industry and try and leverage our collective buying power to engage more suppliers onto Sedex.

- A member of our organization participated in training courses and learned about the auditing and testing of controls to identify possible Modern Slavery practices.
- Training to increase financial literacy of our staff to ensure they are best placed to assert their rights against any overbearing influence which they may have in their lives.
- Took part in the launch of the ACAN compendium highlighting the plight of a survivor of modern slavery in an event which included key stakeholders and suppliers.



14 Our plans for 2025

VMCH is steadfast in its commitment to act along the path to identify and mitigate modern slavery risk. Our plan for 2025 is to focus on three key priorities:

i) We will continue to be an Ethical Employer

VMCH provides a decent, fair, and safe place to work.

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

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

Use our influence and leverage, where possible, 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.

iii) We will continue to increase transparency and understanding of modern slavery risk 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.
- Policies – maintain up-to-date policies which are fit for purpose and follow our Governance Framework.
- Strategic Partnerships – continue to 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 – continue to 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.
- Making a positive impact – VMCH has released our first Social Enterprise Impact Report, tracking our progress in supporting people with disability to find and sustain meaningful award-wage employment. This initiative is a global movement raising awareness of purpose-driven businesses and the positive impact they make on people's lives. VMCH has long been committed to supporting people of all ages and abilities to reach their goals with zero tolerance of modern slavery.

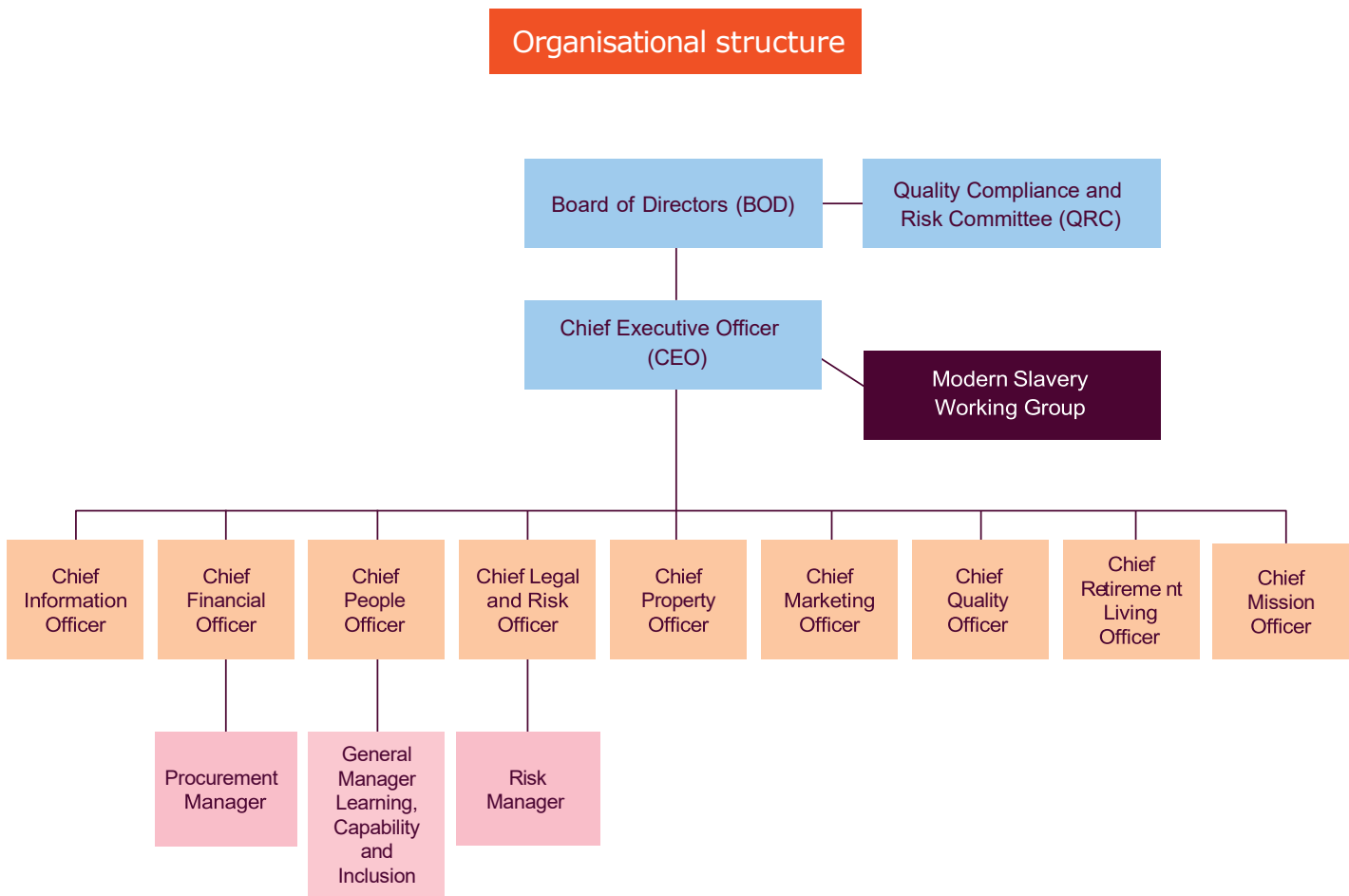
Through these measures, we aim to create an environment that is free from modern slavery and promotes the dignity and respect of all individuals. We believe that by taking a proactive and comprehensive approach, we can make a significant contribution to mitigating modern slavery risk for VMCH.

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-plus 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 structure includes a procurement function (reports to the CFO) and risk function (reports to the Chief Legal and Risk Officer) which provides support to the operational areas. We also have a Capability and Inclusion senior manager (reports to the Chief People 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 structure that ensures the highest standards of care and allows for the mitigation of 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. The objectives of this working group 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.

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 2025 VMCH Strategic Plan, under the headings:

Effectiveness

- Excellent Board governance practice
- 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 2,906 active suppliers, who supply a range of goods and services to enable VMCH to maintain its 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.

Our supply chain is diverse and encompasses small local businesses through to national and global businesses with extensive and international supply chains. We deal mainly with suppliers with an Australian presence, and many have their head office in Australia. Other suppliers' head offices are based around the world in key countries including China, United Kingdom, and the United States. 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.

We make sure we include a modern slavery questionnaire for each tender, ensuring can determine if there are any relevant modern slavery practices by the service providers.

Examples of what we source:



VMCH has a robust tender process in place to review our tenders for potential modern slavery risks.

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.
- **Vulnerability of workers risk:** relates to the likelihood that a worker, due to their specific circumstances like social economic aspects could be exploited or forced into labour conditions that constitute modern slavery, often due to factors like lack of legal protections, limited language skills, migrant status, poverty, or reliance on a single employer for their livelihood, making them susceptible to coercion and abuse.

2.2 Understanding modern slavery within VMCH's context

In 2024, VMCH continued to develop its corporate understanding of modern slavery risk. We developed key processes to assess elevated modern slavery risk areas within our business supply chain, have 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 2025 work, we will continue to work with our partners to drive supplier engagement to join Sedex, continuing to drive staff to undertake the modern slavery training modules and highlight where applicable Modern Slavery risk.

Also, 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. In 2024, VMCH introduced an anonymous whistleblower line, thereby strengthening the ability for individuals to highlight issues including modern slavery matters. VMCH continues to build knowledge and awareness of human rights issues among employees and volunteers and encourages them to voice any concerns without fear of retribution and with confidentiality.

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 supplier surveys, Sedex membership and supplier's Self-Assessment Questionnaires, Maturity Assessment, training modules and having access to key speakers.

In 2024 VMCH had the privilege to have the presence of Mr. Moe Turaga, a Modern Slavery survivor expert speak to its corporate office staff about his experience and current work in highlighting his lived experience and his work in his plight to eradicate Modern Slavery in Australia.

2.3 Modern Slavery Maturity Assessment

In previous modern slavery statements VMCH undertook a gap analysis to assess and analyse our work in the modern slavery area. In 2024, we have commenced a maturity assessment model. This is a more comprehensive model that aims to assesses how VMCH approach's maturity to drive the impact against modern slavery. The maturity assessment will allow tracking over time.

The following is a description of the categories assessed for the maturity assessment:

- **Business Process and Governance:** Establishes the overarching structure and policies guiding our efforts, emphasizing the importance of oversight and clear responsibilities. VMCH has implemented rigorous governance practices including:
 - Risk assessments, identify high risk areas within the supply chain based on factors like geography, industry, and labour practices.
 - Supplier due diligence, screening potential suppliers for modern slavery risks before engaging with them.
 - Training employees on modern slavery issues. Educate employees at all levels about modern slavery risks, company policies, and reporting mechanisms.
 - Grievance mechanisms, establish clear and accessible grievance mechanisms for workers to report concerns about potential labour abuses.
 - Modern slavery working groups to discuss and track modern slavery workplans.
 - Comply with mandatory modern slavery reporting requirements.
- **Operations (+5% YOY):** Focus on internal practices and how effectively we manage risks within our day-to-day activities. At VMCH these include:
 - Risk assessments of operations and supply chains to potentially identify vulnerabilities.
 - Assess suppliers before doing business with them.

- **Supply Chain:** Examines our external partnerships and then mechanisms in place to assess and mitigate risks beyond our immediate operations, including:
 - Conduct assessments of potential suppliers.
 - Foster open communication with suppliers, establish clear expectations regarding ethical practices.
- **Worker Engagement:** Addresses how we manage worker engagement, and the standards upheld to prevent exploitation. At VMCH these include:
 - Empowering employees to identify potential exploitation within its operations.
 - Establishing clear channels for employees to raise concerns anonymously, including reporting mechanisms to relevant authorities.
 - Report concerns without fear of retaliation and actively participate in creating a workplace culture that values ethical practices.
- **Entity's Program and Activities:** Looks at the broader initiatives and engagements we undertake to combat modern slavery.
- **Grievance Mechanisms and Remediation:** Evaluates the channels available for reporting concerns and the process for addressing them.

The change in VMCH maturity assessment based on the comprehensive model now used has shown a improvement year on year as set out below:

| | |
|--------------------------------------|-----|
| Business Process and Governance | +3% |
| Operations | +5% |
| Supply Chain | +4% |
| Worker Engagement | +1% |
| Entity's Program and Activities | +3% |
| Grievance Mechanisms and Remediation | +2% |

24 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 has analysed 614 suppliers by spend from its 2024 total supplier list, an increase of 564 compared to 50 by spend suppliers analysed in 2023. This is approximately 21 percent of all suppliers.

The suppliers were classified by spend categories and were then categorised with a risk classification. Analysing a higher base of suppliers allows classifying higher-risk suppliers which in term will enable VMCH to focus their efforts on the areas where the potential for forced labour or exploitation is most significant, also enabling VMCH to prioritise due diligence and mitigation strategies in the parts of their supply chain most likely affected, ultimately leading to a more effective fight against modern slavery practices.

Other reasons why classifying higher-risk suppliers is beneficial:

- **Efficient resource allocation:** Focusing on high-risk suppliers allows companies to prioritise their efforts and allocate resources more effectively towards addressing the most critical areas of concern.
- **Improved risk mitigation:** By proactively identifying and mitigating risks associated with high-risk suppliers, companies can reduce the likelihood of being implicated in modern slavery practices within their supply chain.

There will be greater focus on supplies in the high and medium risk categories.

The following is a breakdown of spend (614 suppliers) as a percentage of total spend.

Breakdown % of spend

| High Risk | 57% |
|---|-----|
| Building and construction | 17% |
| Cleaning and Security | 4% |
| Events and events management | 1% |
| Facility management and property maintenance | 7% |
| Finance and investment | 1% |
| Food and catering services | 9% |
| Furniture and office supplies | 1% |
| ICT hardware | 6% |
| Labour hire | 8% |
| Medical devices and supplies | 4% |
| Transport and logistics | 0% |
| Uniforms and PPE | 0% |
| Waste management services | 0% |
| Medium Risk | 8% |
| Advertising & Marketing | 0% |
| Fleet management, consumables and maintenance | 1% |
| ICT software and network services | 3% |
| Print / mail provider | 0% |
| Travel and accomodation | 1% |
| Utilities | 3% |
| Low Risk | 5% |
| Government and agency fees | 0% |
| License / member fees | 1% |
| Professional services | 4% |

Note: Spend categories are classified according to ACAN Taxonomy

Overall, supplier analysis increases a maturity score by enabling a company to identify areas where their supplier relationships can be improved, leading to better quality, cost efficiency, and overall supply chain performance, which are key factors in a maturity model assessment; essentially, by actively evaluating and optimizing supplier capabilities, a company demonstrates a more advanced level of procurement and supply chain management, resulting in a higher maturity score.

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 52 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; 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.

3.1.1 Supplier Engagement

- The ACAN supplier surveys were also completed by over 200 suppliers and assessed by ACAN.
- The supplier code of conduct was in place for the 2024 reporting period
- 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. In 2024, 48 of our suppliers' sites have completed the Sedex Self-Assessment Questionnaire, with 4 sites identified as high risk for modern slavery. These 4 sites are in the US and are manufacturing factories of a global company, with ongoing risk mitigation activities taking place as part of ACAN.

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 developed with the assistance of ACAN, is part of VMCH's online training portal for employees and volunteers.
- Modern Slavery online training is included in the suite of modules directors are required to complete.
- Webinars and training were made available to suppliers.
- Monthly ACAN Working Webinars are attended by the Chief of Risk and Legal Officer and the Risk 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.

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 2024, there was a focused effort on reducing reliance on agency staff through the continuation of the scheduling project. The project focused on reducing the level of agency used at VMCH, 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.
- 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 (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, specialized resources are required to ensure the best outcomes for individuals affected by modern slavery.

VMCH is pleased to report no cases of modern slavery in its operations and supply chains in 2024, based on current processes and supplier interviews.



4

Criteria 5: Effectiveness Assessment

At VMCH we understand that improvements and challenges to eradicate potential Modern Slavery risks will be a continuous process for the organisation. However, we have robust modern slavery policies and processes in place and have clear expectations with our suppliers, contractors and staff. We have continued to strengthen and resource our induction and onboarding processes to assist in monitoring modern slavery risk.

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.
- Regular review and improvement of VMCH's suppliers.
- Workplace engagement survey.

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.

6

Criteria 7:

Other – Future Commitment

VMCH has outlined specific actions for 2025 that directly address the identification, management, and mitigation of modern slavery risks.

Specific actions are listed below:

- Ensure our policies are up to date, fit for purpose and follow our Governance Framework.
- Identify and partner with appropriate external organisations to assist in determining the effectiveness of our metrics in developing our engagement with suppliers.
- Ensure all VMCH staff, contractors and volunteers are informed of the risks of Modern Slavery.
- Continue to inform the organisation of countries and sectors that have a higher risk of modern slavery.
- Report annually.

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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Join the conversation



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