Uniting Church in Australia
SYNOD OF VICTORIA AND TASMANIA

FY24

MODERN SLAVERY STATEMENT

Uniting | Uniting AgeWell | u ethical investing with purpose

Table of Contents

Foreword 3

Structure of this Statement 5

1. About the Uniting Church in Australia **6**

1.1 Approach 8

2. Justice and International Mission **9**

2.1 About the Justice and International Mission Cluster 9

2.2 Investigative work and activities coordinated by JIM 10

3. Synod of Victoria and Tasmania **13**

3.1 Assessment of modern slavery risk in our supply chain 13

3.2 Processes and controls to mitigate modern slavery risks 18

3.3 Steps taken for remediation and improvement 19

4. Uniting **20**

4.1 Introduction 20

4.2 Assessment of modern slavery risk in our supply chain 21

4.3 Processes and controls to mitigate modern slavery risks 22

4.4 Steps taken for remediation and improvement 23

5. U Ethical **25**

5.1 Introduction 25

5.2 Assessment of modern slavery risk in our supply chain 26

5.3 Steps taken for remediation and improvement 32

6. Uniting AgeWell **36**

6.1 Introduction 36

6.2 Assessment of modern slavery risk in our supply chain 37

6.3 Processes and controls to mitigate modern slavery risks 38

6.4 Steps taken for remediation and improvement 38

241114 MRU_RM&IS

I Foreword

This joint modern slavery statement is made by The Uniting Church in Australia Victoria and Tasmania group which includes:

- The Uniting Church in Australia Property Trust (Victoria) ('UCAPTV');
- The Uniting Church in Australia Property Trust (Tas.) ('UCAPTT');
- Uniting (Victoria and Tasmania) Limited (Uniting);
- Uniting Ethical Investors Limited (U Ethical); and
- Uniting AgeWell Limited (AgeWell)

The Uniting Church in Australia is a faith and values-based organisation with a long-standing history of lobbying for positive change on a broad range of human rights and social justice issues.

We are committed to implementing and enforcing effective systems and controls, within the reasonable limit of our resources, to mitigate and reduce the risk of modern slavery occurring within our operations or supply chains. We respect the human rights of our employees, volunteers, consumers, and employees of our suppliers and business partners, and we commit to identifying and managing any risks to these rights.

We comply with relevant local and national laws related to human rights and modern slavery concerning our employees and our business operations. The services we provide and the way we work strive to be human-centred and rights-based, as recognised and articulated in international declarations, treaties and covenants that aim to ensure peace and equality among all peoples.

We are committed to building relationships with suppliers, contractors and business partners who share our purpose, values and commitment to ethical and legally compliant business practices.

In accordance with the Federal Government's *Modern Slavery Act 2018 (*Cth) (**the Act**), this statement outlines the steps taken during FY2023/24 to assess and address modern slavery risks within the reporting entities. Our areas of focus continue to be:

- seeking partnerships in investigating supply chains of concern and to leverage bargaining power to reduce modern slavery risks;
- building relationships with our suppliers of goods and services identified as higher risk of having modern slavery in their supply chains; and

- improving our processes to reduce the risk of modern slavery associated with operations.

The reporting entities established a central oversight committee with membership from each entity to discuss and collaborate on modern slavery related issues and prepare this statement. The committee agreed to a general approach for identifying and assessing risks and took a collaborative approach wherever central services were used or where common suppliers were identified to increase leverage.

This statement was approved by the members of The Uniting Church in Australia Property Trust (Victoria) and The Uniting Church in Australia Property Trust (Tas.) pursuant to the powers vested in them pursuant to section 13(3) of the *Uniting Church in Australia Act 1977 (Vic)* and section 11 of the *Uniting Church in Australia Act 1977 (Tas)* respectively and being statutory corporations governing the Uniting Church in Australia and its Institutions in Victoria and Tasmania on 12th October 2024.

Bob Hodges

Chairperson - The Uniting Church in Australia Property Trust (Victoria) and The Uniting Church in Australia Property Trust (Tas.) 12 October 2024

I Structure of this Statement

The Uniting Church in Australia – Victoria and Tasmania Group (**the Reporting Group**) is pleased to make this Statement the contents of which are arranged as follows:

1. **About the Uniting Church in Australia:** this provides background on legal structures of the Group
2. **Justice and International Mission:** this gives a history of the Uniting Church in Australia's long association with work towards eliminating modern slavery and identifies key industries relevant to the Group
3. **Synod of Victoria and Tasmania:** outlines the efforts made in the Uniting Church in Australia's structures to eliminate modern slavery
4. **Uniting:** outlines the efforts made in Uniting's structures to eliminate modern slavery
5. **U Ethical;** outlines the efforts made by U Ethical to eliminate modern slavery
6. **AgeWell:** outlines the efforts made in AgeWell's structures to eliminate modern slavery

1. About the Uniting Church in Australia

Since the amalgamation of the Presbyterian, Methodist and Congregational churches in 1977 to form the Uniting Church in Australia, which has become the third-largest Christian denomination in Australia, helping Australians in the search for meaning, purpose and community in life.

The Uniting Church in Australia is governed by four non-hierarchical, inter-related councils, each one with different responsibilities:

- Assembly (the national council);
- Synod (the regional council);
- Presbyteries (the district council); and
- Congregations (the local council).[1]

The Synod of Victoria and Tasmania is one of six Synods across the Uniting Church in Australia.

The Synod pursuant to Clause 15 (d) of the Basis of Union[2] has responsibility for the general oversight, direction and administration of the Uniting Church in Australia's worship, witness and service in Victoria and Tasmania. A Synod Standing Committee acts on behalf of the Synod in respect of its responsibilities.

Through our historic and ongoing community work, we and our predecessors established and maintained several entities to act as an extension of the Church, including the below and their subsidiaries:

- Uniting (Victoria and Tasmania) Limited;
- Uniting AgeWell Limited;
- Uniting Ethical Investors Limited;

Each of these agencies implements the Synod's strategic directions in social welfare, public welfare, community services, aged care, investment management, and public housing.

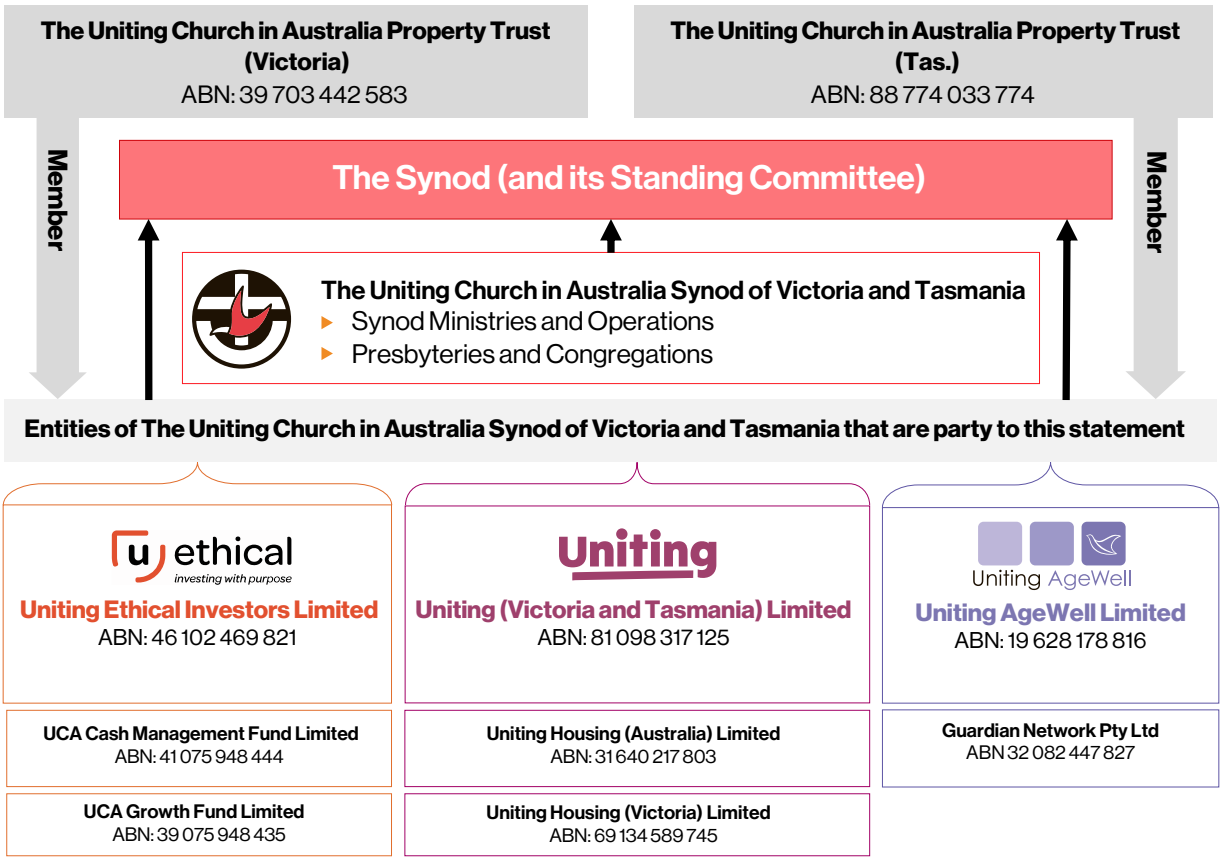
1 Referred to in Clause 15 of the Basis of Union, which is a Schedule to each The Uniting Church in Australia Act 1977 (Vic) and the Uniting Church in Australia Act 1977 (Tasmania) (**the UCA Acts**).

2 Which is Schedule One to the UCA Acts

They act for the Synod, its presbyteries and congregations while reporting to the Synod Standing Committee.

At union of the three churches in 1977, property trusts were established in each state and territory to hold "trust property" in trust for the Church. The UCAPTV and UCAPTT are constituted as corporations[3], and are charities registered with the Australian Charities and Not-for-profits Commission. They control our related entities as members of those entities.

This statement covers the activities and legal entities controlled by UCAPTV and UCAPTT, which are members of each entity. Each entity reports to the Synod Standing Committee, the governing body. Our operating entities (**the Reporting Group**) and their relationship are as below:



Uniting Housing (Australia) Limited and Uniting Housing (Victoria) Limited outsource a range of operational and administrative services to Uniting. The outsourcing arrangement includes end-to-end procurement of all goods and services.

3 By Section 12(1) of The Uniting Church in Australia Act 1977 (Vic); and Section 10(1) of the Uniting Church in Australia Act 1977 (Tas).

For that reason, the Modern Slavery Statement is being made by Uniting on behalf of all three entities.

Guardian Network Pty Ltd is a fully held subsidiary of AgeWell and so AgeWell is making this Modern Slavery Statement on that entity's behalf.

1.1 Approach

Our entities approached their respective modern slavery risk assessments by assessing their operations and supply chains according to key risk indicators across the following aspects of the supply chain, where possible:

a. products or service type, and nature of production
b. sector and industry, and types of employment arrangements generally applied
c. geographic distribution of supply chain
d. entity and structure of suppliers.

The specifics of each entity's approach varied due to differences in the nature of their operations and the sector within which they operate. Further details are provided within individual entity sections of this statement. Where entities identified common supply chains with potential modern slavery risks, a joint approach to further assessment and supplier engagement was taken to reduce duplication and increase market leverage.

2. Justice and International Mission

2.1 About the Justice and International Mission Cluster

The Synod's Justice and International Mission Cluster (**JIM Cluster**) has advocated for supply chain transparency legislation from 2011. The JIM Cluster is a section of staff within the Synod dedicated to resourcing church members to take action on issues of social justice, human rights, environmental protection and global development.

We were represented on the Supply Chain Working Group of the Attorney General's National Roundtable on Slavery and Human Trafficking that recommended the legislation to the Minister. We participated in the parliamentary and departmental inquiries in developing and passing the Act into law. We were represented on the advisory body that drafted the guidance to reporting entities on the implementation of the Act.

We continue to be represented in the Australian Government's National Roundtable on Slavery and Human Trafficking.

We were also a member of the Australian Border Force Modern Slavery Expert Advisory Group.

We have been part of global campaigns to address modern slavery in specific industries and locations. These have included:

- the cocoa industry in West Africa
- cotton production in Uzbekistan
- the seafood industry in Thailand
- disposable glove production in Malaysia
- the tinned fruit and vegetable industry in Thailand
- the garment industries in India and Cambodia.

We have experience organising on-the-ground investigations into businesses, working in collaboration with local non-government organisations and trade unions with the appropriate expertise.

Given the experience and capabilities of the JIM Cluster, and the overlap of some suppliers between entities, the JIM Cluster coordinated investigations into the Reporting Group's suppliers on their behalf. The following section outlines specific interactions the JIM Cluster had with suppliers that represented a high risk of modern slavery in one or more of the entities' supply chains. Each of the suppliers investigated relate to at least one of the reporting entities covered by this statement. A materiality threshold of $50,000 of purchase in the previous 12 months was applied in deciding which suppliers to engage with. We took the view that for any supplier where our purchase was below $50,000, we were unlikely to be able to influence the behaviour of the supplier in dealing with modern slavery risks. The focus was also on engaging with suppliers that would have an on-going relationship with the Reporting Group through one of its entities.

2.2 Investigative work and activities coordinated by JIM

2.2.1 Modern slavery in our fruit and vegetable supply

We purchase fresh fruit and vegetables from Coles and Woolworths. We are aware of on-going labour exploitation in the Australian horticulture sector. We continue to collaborate with the United Workers Union on seeking reforms to curb exploitation of people working in the Australian horticulture sector. However, we have not been aware of recent evidence of forced labour or modern slavery in the Australian horticulture sector. It has not been possible to establish the qualities of specific fresh fruit and vegetables that have been purchased across the organisation, but we have assumed that some of that spending has been on horticulture products. Engagement with Coles and Woolworths on possible improvements to their systems to address the risks of illegal labour practices in their supply chains has broken down. Both have indicated they do not support the requested reforms that the Synod has put to them. Coles and Woolworths have both refused to commit to the Reporting Group's request to adopt an approach which preferences suppliers in the horticulture sector that use only Australian employees or who are connected with the Pacific Australia Labour Mobility scheme to reduce risks of criminal exploitation of workers. They have also rejected requests to share their supplier lists in the horticulture sector with relevant unions, as a further mechanism to gather evidence their suppliers are involved in illegal labour practices.

2.3 Solar Panels and other goods from China

The Reporting Group became aware in August 2021 of a report by the Helena Kennedy Centre for International Justice at Sheffield Hallam University published in May 2021[4], of the use of forced labour in the production of solar panels in China. Congregations within the Synod that are the responsible body for property may seek to have solar panels installed.

These purchases may occur at the local congregation level without the knowledge or oversight of the Synod office. In February 2022 we issued a resource sheet to our congregations advising them on how to reduce the risk of modern slavery in any solar system purchase they make.

In May 2022, the national meeting of Uniting Church representatives passed a resolution calling for all parts of the Uniting Church in Australia to commit to net-zero greenhouse gas emissions by 2040. The request means that more congregations are considering the installation of solar panels.

In November 2023, the Synod governance meeting of over 200 Uniting Church delegates from across Victoria and Tasmania passed a resolution urging all parts of the Reporting Group to avoid making purchases from businesses that have been involved in severe human rights abuses, serious criminal activity or excessive environmental damage.

The JIM Cluster has conducted extensive work to try and find a solar panel supply chain with minimal risk of modern slavery being present. The work by the Cluster points to many solar panel manufacturers moving more of their supply chain into China despite public exposure of forced labour in Chinese solar supply chains. The JIM Cluster has been advising parts of the Reporting Group looking to install solar panels they should purchase from 1KOMMA5° or Maxeon as having the lowest risks of forced labour in their production. 1KOMMA5° report that all the components in the panel are sourced from Germany, but they are assembled in a factory in China. The JIM Cluster made a number of requests to the company to disclose the name and location of the Chinese factory, but the requests were not responded to.

Maxeon was identified by the Sheffield Hallam University, Helena Kennedy Centre for International Justice as being free of materials from the Uyghur regions in China in their production.[5] However,

4 Laura T. Murphy and Nyrola Elima, 'In Broad Daylight. Uyghur Forced Labour and Global Supply Chains', Helena Kennedy Centre for International Justice, Sheffield Hallam University, May 2021.

5 Alan Crawford and Laura Murphy, "Over-Exposed: Uyghur Region Exposure Assessment for Solar Industry Sourcing", Sheffield Hallam University, Helena Kennedy Centre for International Justice, November 2023, 2.

we are aware that forced labour in China extends beyond the Uyghur regions and to a wide range of people, not just the Uyghur ethnic group.

Forced labour in Chinese supply chains is not confined to solar panel production. The Reporting Group is aware of the strong evidence of the use of forced labour in China under the approval of the Chinese Government across a range of products. While the risk of forced labour is particularly high in relation to the Uyghur ethnic group, it also extends to forced labour involving work experience students more generally.

The Reporting Group has concluded it is impossible to address risks of modern slavery in the production of goods out of China at the current time, due to the endorsement and facilitation of forced labour by the Chinese regime. The involvement of the regime makes it impossible to conduct effective on-the-ground investigations to determine if forced labour is present in the production of certain goods. Investigators from the Reporting Group have spoken with those with experience of working in China, and have reported that any attempts at meaningful investigation of forced labour inside China are now treated as industrial espionage by the government. Responses from Chinese suppliers cannot be relied upon as evidence that forced labour is not present in the production of goods. The absence of independent trade unions also hinders any independent verification that modern slavery is not present in the production of the goods in question.

3. Synod of Victoria and Tasmania

Annual Gross Revenue for 2023 $45,722,000

Required for statement submission The Synod is one of six councils of the Uniting Church in Australia. It has oversight, direction and administration of the worship, witness and service of the Uniting Church in its region of responsibility, Victoria and Tasmania. Within our Synod, there are eight Presbyteries which are regional councils of the Church and over 500 individual Congregations, each with their church council. To support our central role, a body referred to as 'Synod Ministries and Operations' (**SMO**) has been established to resource the wider Church and provide administrative and support services.

As a religious body, our operations focus on providing worship and missional services amongst the wider community. In our role of resourcing the Church and providing further learning in theology, we have established the Pilgrim Theological College, which provides accredited studies in theology, philosophy and ministry. Across FY24, we also offered a range of missional services to the community across the life of the Church, such as opportunity shops, community support services, and social groups and programs. Since the prior statement, we have divested 'Uniting Church Camping' which previously operated a number of campsites and camp programs.

In delivering services to the community, we operate a grants program to provide direct financial support for a wide range of initiatives across the life of the Church, including grants to Uniting. Other key areas of spend include property maintenance and development, information technology, insurance and utilities.

3.1 Assessment of modern slavery risk in our supply chain

Our modern slavery risk assessment process focuses on reviewing our supply chain through spend analysis and categorisation, desktop research of suppliers, and supplier engagement in key risk areas.

Due to limited detailed supplier data, we are not able to undertake a detailed geographic risk assessment of our suppliers, however the vast majority of our tier-one suppliers are local. This work was completed in partnership with our JIM Cluster, who coordinate a range of supplier investigations for all the reporting entities, as detailed in section 2.

3.1.1 Synod Ministries and Operations

The text below provides an overview of some of the inherent risk spend categories identified.

Spend category: Property maintenance and development

We undertake a range of property development, improvement and maintenance activities across Victoria and Tasmania. The majority of spend relates to the labour costs of contractors, with the key risk pertaining to the manufacturing supply chain of materials and parts, which is many tiers down SMO's supply chain. While this is a material spend category, we have very little bargaining power relative to the broader property industry. There are also difficulties in investigating these risks, with limited product transparency available in many instances.

SMO uses preferred contractors wherever possible. In procuring contractors for work, the cost is not the only consideration and proposals are assessed on their achievability to prevent underquoting. Underquoting may increase the risk of modern slavery in the supply chain.

Spend category: Information technology (IT) hardware

With a largely office-based workforce, we have material spend on electronic hardware. We recognise that there is a high risk of modern slavery in IT hardware. This continues to be an area of active investigation coordinated by our JIM Cluster.

Spend category: Cleaning Services

The Synod office is located at Wesley Place in Melbourne which is operated by Charter Hall, who are part of the Cleaning Accountability Framework.

Charter Hall advised in July 2024 that they are planning to undergo Cleaning Accountability Framework (CAF) certification for 130 Lonsdale this year, though the certification process can take some time. In the interim, existing controls apply with Charter Halls internal policies and processes in regards to modern slavery procurement.

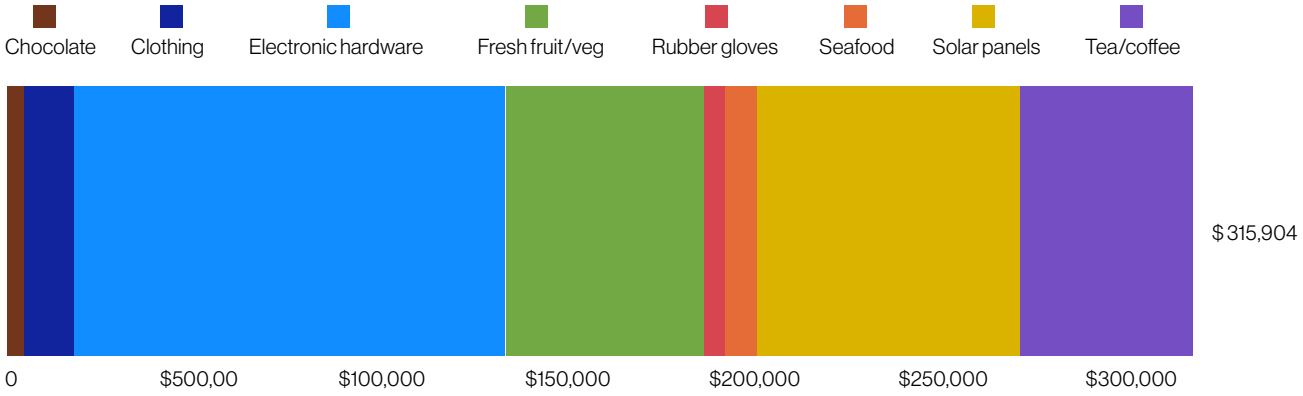
Food services

Procurement of food services/products for our offices or catered events is not material. However, recognising this is a high risk area, guidance has been given to staff to reduce risk of modern slavery related to this category. This includes using a local preferred supplier for catering and opting for Fairtrade where possible for general supplies including tea and coffee.

The JIM Cluster will continue to lobby more broadly across the food sector to improve transparency and working conditions across the supply chain.

3.1.2 Congregations and Presbyteries

Each year, we ask our congregations and presbyteries to complete an annual financial survey. Within the survey, specific questions have been incorporated to gauge estimated spend on some higher risk categories in relation to modern slavery. The outcome of this survey, from the 158 congregations and 2 presbyteries that had completed the survey (as at 17th December 2024), is demonstrated in the below chart and table.



Spend category	Estimated spend
Chocolate	$ 4,108
Clothing	$ 13,432
Electronic hardware	$115,050
Fresh fruit/veg	$ 53,597

Spend category	Estimated spend
Rubber gloves	$ 4,880
Seafood	$8,305
Solar panels	$70,427
Tea/coffee	$46,105
Reported Total Spend	**$ 315,904**

The text below provides further assessment related to higher-risk spend areas from the presbyteries and congregations.

Spend category: Property maintenance and development

Presbyteries and congregations undertake a range of property maintenance activities to ensure Church buildings remain safe and fit for purpose. The majority of spend relates to the labour costs of contractors, with the key risk pertaining to the manufacturing supply chain of materials and parts, which is many tiers down the supply chain.

Any property maintenance and development projects with material spend are overseen and coordinated by the SMO's Property Services Team. This spend is therefore subject to SMO procurement and risk management practices.

Spend category: Information technology (IT) hardware

With some congregations strengthening their online presence and increasing the use of technology solutions to support operations, there has been increasing need for IT hardware. Wherever practical, presbyteries and congregations are encouraged to procure IT hardware via SMO's IT Team so these purchases are subject to SMO procurement and risk management practices.

Spend category: Solar panels

Presbyteries and congregations that are responsible for properties may seek to have solar panels installed to improve environmental sustainability.

As previously investigated and reported by the JIM Cluster, the Synod recognises this as

a high-risk product, however notes that:

- this is a limited spend category;
- there is limited ability to procure solar panels without this risk; and
- the Synod has no ability to leverage the industry for change.

The JIM Cluster has identified preferred solar panel suppliers with lower risk of forced labour in the production of the panels.

Spend category: Clothing

Presbyteries and congregations may on occasion procure clothing goods to support missional activities. This consists of ad hoc purchases from local suppliers with limited ability to assess and understand modern slavery risks or to leverage suppliers for change.

Spend category: Food services

- Fresh fruit and vegetables
- Seafood
- Tea and coffee
- Chocolate

Many of our congregations procure food, tea and coffee from local grocery stores to share at various community gatherings. While a low spend category for individual congregations, we recognise the inherent risk in this sector and note that the collective spend across congregations is material. We have developed informative posters to spread awareness on modern slavery risks, including advice on reducing risks such as buying Fairtrade where possible.

The JIM Cluster will continue to lobby more broadly across the food sector to improve transparency and working conditions across the supply chain.

Spend category: Disposable gloves

Congregations have some limited spend related to disposable gloves. This consists of ad hoc purchases from local suppliers such as pharmacists and supermarkets with limited 'buying power' or ability for local stakeholders to assess related risk.

3.2 Processes and controls to mitigate modern slavery risks

3.2.1 Synod Ministries and Operations

SMO provides oversight on the terms for employment to ensure appropriate conditions for those people employed across the Church. SMO staff are protected under approved enterprise bargaining agreements that are subject to periodic review and renegotiation. SMO's central payroll service is utilised by presbyteries and congregations for all ministerial and the majority of other employment arrangements, helping to ensure pay and entitlements are accurately and consistently applied.

SMO uses a decentralised procurement approach with limited central oversight and reporting for routine procurement activities. Our procurement policy requires that modern slavery, and ethical sourcing more generally, is a key consideration throughout the procurement process. The JIM Cluster and Risk Management Team provide ad hoc guidance and advice to individual work as needed to apply procurement requirements and mitigate modern slavery risks in procurement activities.

Each year we review our suppliers based on total annual spend and product type. Our analysis is based on the US Department of Labour List combined with our knowledge of sector risks from the JIM Cluster. Where potential risks are identified, we work in consultation with our JIM Cluster to investigate through engagement with our supply chain to understand the risk better, and if confirmed, to lobby for change through our suppliers. Where we are unsatisfied with the response, we would then consider seeking an alternate supplier(s).

3.2.2 Congregations and Presbyteries

Under the inter-conciliar operating model, the Synod does not direct the activities of presbyteries and congregations, including how they undertake procurement, nor is there detailed reporting over procurement. Annual survey reporting from congregations captures estimated spend in key risk categories. However, transparency of transaction/supplier level detail of spend remains limited.

Spend on higher-risk products is made up of many small purchases across many suppliers

across the presbyteries and congregations. Thus, none of the expenditure by congregations would allow for meaningful engagement with suppliers that is likely to lead to change given the small values involved. Instead, where relevant, the Synod seeks to provide information and education to the wider Church to support in making informed choices regarding spend on high-risk products and directing them towards lower risk suppliers.

3.3 Steps taken for remediation and improvement

Steps taken since last Modern Slavery Statement

Through the Synod's JIM Cluster, we have continued to engage with material suppliers from those spend categories identified to have higher risks of modern slavery to better understand the supply chains and address potential risks therein. This engagement is outlined in section 2 of this statement.

Our future plans:

In our continuous commitment to identify and combat modern slavery risks, we aim to:

- continue to investigate high-risk categories of spend; and
- ongoing engagement with suppliers to identify and mitigate modern slavery risks.

4. Uniting

Annual Gross Revenue for FY24 $414,644,000

Required for statement submission

4.1 Introduction

Uniting (Victoria and Tasmania) Limited ('Uniting') is one of the largest community service providers across Victoria and Tasmania, with over 3,700 employees and 2,000 volunteers.

Uniting is the community services organisation of the Church and was formed via the transfer of operations, assets and liabilities from 21 agencies on 1 July 2017. Uniting delivers a broad range of programs and services in the areas of crisis and homelessness, alcohol and other drugs, child, youth and families, mental health, disability, early learning and employment services.

Uniting Housing (Australia) Limited and Uniting Housing (Victoria) Limited are subsidiaries of Uniting and outsource all operational and administrative services to Uniting. The outsourcing arrangement includes end-to-end procurement of all goods and services. For that reason, this modern slavery statement is being made by Uniting on behalf of all three entities.

As well as providing services directly, Uniting also partners with other community service providers to deliver services. An example is the Disability and Carer Support Program, in which Uniting participates as part of the Victorian Carer Gateway Consortium.

Uniting's significant areas of procurement are in infrastructure-related products and services (property and ICT) and frontline labour to support the broad range of programs and services.

Except for property, ICT and other significant projects, procurement at Uniting is mainly decentralised. The procurement function provides policy and governance for procurement across the organisation and the processes and tools used to purchase and contract suppliers of goods and services. Additionally, Procurement runs tendering activity and secures partnerships with suppliers for key strategic categories such as Financial Audit, Real Estate, Property Maintenance, Cleaning and ICT products and services. Functionally, individual business groups are expected to conduct their own procurement activities and engage with the central procurement function where materiality or complexity warrants assistance. Property and ICT administer procurement from their centralised functions.

4.2 Assessment of modern slavery risk in our supply chain

Uniting primarily procures infrastructure (Property and ICT) and frontline labour to support the range of programs and services we provide to the community. ICT continues to present the highest risk profile of these three key procurement streams due to the supply chains of materials and support services that extend into geographic regions known to present modern slavery risk. Property has a lower risk profile, with risks mainly centred around the supply of furniture and fittings that could originate from geographic areas known to present modern slavery risk. Frontline labour has a relatively low-risk profile based on a labour force that is grounded in Australia.

4.2.1 Information Communication & Technology (ICT)

The findings from our work have revealed that generally critical ICT equipment is only available in Australia via intermediaries (resellers), and the manufacturer has little presence in Australia. Resellers were unable to respond on behalf of other parties due to legal liability, and as such, had to draw upon reporting in other key jurisdictions such as in the State of California (United States) *Transparency in Supply Chains Act 2010* and in the United Kingdom *Modern Slavery Act 2015*. Nevertheless, Uniting has made a concerted effort to include questions which address modern slavery risks within its supply chain as part of new tender processes.

Uniting remains committed to the ethical sourcing of ICT equipment and services and expects that suppliers and partners continuously show alignment to this core value.

4.2.2 Property – Asset Management

The findings from our analysis in this area revealed that Uniting contracts with several small-scale local area contractors. The most significant risk in this area is employers sourcing labourers and low skilled employees at below award rates, but not of modern slavery. The dangers of exploitation and wage theft are mitigated by:

- these contracts generally being associated with trades that are often unionised;
- Uniting facility management staff being experienced and cognisant of the inherent

risk in the sector and the potential reputational risk to the organisation of inappropriate practices being revealed; and

- competitive quoting undertaken by staff familiar with the industry who review and check bids against estimated hours and industry pricing.

The Housing and Property division is working through the implementation of an asset management system which will allow for closer monitoring of contractors and their compliance with the modern slavery act.

4.2.3 General

In the current reporting period, Uniting have again re-profiled our supplier register to identify high-risk suppliers and provided the JIM Cluster with this profiling data.

Suppliers are identified as higher risk by being known to source products on the US Department of Labour list for goods of higher risk of forced labour in their production (**www.dol.gov/ sites/dolgov/ files/ILAB/ ListofGoods.pdf**) or where the JIM Cluster is aware of reports or research that has previously identified the presence of modern slavery in the production of a good or service.

4.3 Processes and controls to mitigate modern slavery risks

2024 Tendering Activity

4.3.1 Tendering Processes

Uniting's RFx requirements continue to be standardised to include modern slavery considerations. In a recent tender within Uniting's Early Learning space, tender responses were sought:

- Procedures for identification and investigation of modern slavery risk within the respondent organisation and its supply chain.
- The respondent's policies and statements regarding modern slavery.
- The respondent's assurances of compliance with global labour standards and that there was no child or forced labour within the organisation's supply chain.

4.3.2 Commercial Controls

Uniting's contract clauses and purchasing standard terms and conditions have been updated to include:

- A supplier's warranty that it will not engage in Modern Slavery practices within its own operation or enter into agreements which expose it to a modern slavery risk.
- A provision enabling Uniting to request information about the entities in the supplier's supply chain as well as location data for such entities.
- An undertaking by the supplier to disclose any risk or occurrence of Modern Slavery Practices within its supply chain.

4.4 Steps taken for remediation and improvement

Steps taken since last Modern Slavery Statement

- Uniting has embarked on further risk assessment within business streams.
- We continue to work closely with the Synod's JIM Cluster to identify high-risk suppliers and support inquiries.
- New contract clauses have been introduced into our standard form contract templates which contain the conditions upon which Modern Slavery risk assessment and remediation work can occur easily.
- In collaboration with the Synod's legal team, Uniting revised its Purchase Order Standard terms and conditions to include mechanisms to audit modern slavery risks within our supply chain.
- Enhanced the centralised procurement function's risk assessment and commercial capability to better assess and mitigate modern slavery risks.
- Ensure contract templates include appropriate clauses relating to anti-slavery laws.
- Engaged with suppliers in the 'Cleaning' category to highlight modern slavery risks and evaluate responses.

We commit to continuously improve our processes to identify and combat modern slavery risks. In doing so, we will:

- In 2025 intend to introduce a more robust supplier creation process whereby the social procurement enhancements made to our ERP will be utilised for all new supplier setups where there is greater modern slavery risk identified.

- Continue to promote awareness and active evaluation of modern slavery risks to all staff who are involved in procurement activities.
- Continue to investigate high-risk categories of spend.
- Continuously engage with suppliers to identify and mitigate modern slavery risks.

5. U Ethical

Annual Gross Revenue for FY24 $10,030,000
Required for statement submission

5.1 Introduction

We are an ethical and responsible investment manager with approximately 23 employees, primarily office-based and located in Melbourne, Australia. Our core business is issuing and managing investment products.

Our investment process applies strict ethical screens. We seek to invest in companies that comply with our ethical investment principles and policy with high or above average environmental, social and governance (ESG) ratings and which are aligned with the United Nations Sustainable Development Goals. Please refer to U Ethical's ethical investment policy and our ethical investment and stewardship approach which are available on our website at **www.uethical.com.**

We are also a social enterprise. The majority of our operating surplus funds a community contribution made via the Uniting Church in Australia, Synod of Victoria and Tasmania. The Synod uses these funds to facilitate social justice advocacy and community programs.

We are governed by an independent board of directors. The board has established three committees to advise it on key governance areas: the investment committee; the audit, risk and compliance committee; and the people and nominations committee. The board provides strategic guidance and effective oversight of the company and management.

We consider modern slavery an important, albeit complex, topic and seek to contribute to the elimination of these practices across the world. Our strategy to identify and manage modern slavery risks involves first determining the appropriate standards and then incorporating these into our ethical investment approach, our ongoing engagement with investment portfolio companies, as well as with our key suppliers and service providers. Our supply chain risks arise indirectly from those we invest in and directly from purchases of education, human resources, consulting, telecommunications, financial services, etc.

5.2 Assessment of modern slavery risk in our supply chain

5.2.1 Investments risk assessment – Indirect

Modern slavery risk assessment methodologies within the asset management industry vary in the level of detail and depth. U Ethical prides itself in being an industry leader in responsible investment, and our investment team uses a range of tools and resources to assess potential modern slavery risks within the companies in our portfolios.

These include evaluation of controversies highlighted through Morgan Stanley Capital International (MSCI) ESG Research's screening tools, controversies alerts, broker research, and the ISS proxy voting benchmark data (U Ethical has adopted ISS's Socially Responsible Investment policy framework), as well as modern slavery exposures identified by the Justice and International Mission (JIM) Cluster. Through a combination of quantitative screening coupled with qualitative assessments of all companies considered for portfolio inclusion, we integrate ESG analysis into our process for creating long-term sustainable value for our investors. We address areas of concern directly with our portfolio holdings in our engagement activities and also actively vote on equity holdings through our proxy adviser or by direction. For example, in cases where we receive an unsatisfactory company response on ESG related controversies, or in cases of egregious behaviour, we will vote against at least one of the following (in descending order):

- The chair of the board;
- The chair of the nominations committee;
- A member of the nominations committee; or
- The longest-serving director seeking re-election.

We currently invest in securities issued by approximately 100 companies across our cash, fixed income and equity products. Our portfolio holdings are published on our website at **www.uethical.com**. These companies are domiciled in Australia, the US, Europe, the UK, Taiwan and Japan, but have operations and complex supply chains across a wide range of developed and emerging markets.

We continuously track the exposures of our portfolios, which were exposed to nine of the eleven Global Industry Classification Standard (GICS) sectors. These identified key risks related to modern slavery within the consumer discretionary, consumer staples, healthcare, industrials, information technology and real estate sectors. Fixed income portfolios also included exposure to government agencies and not-for-profit organisations, such as Treasury Corp of Victoria and Western Sydney University, as well as direct lending to a range of commercial and community borrowers, none of which flagged material risks.

Through a process of active engagement and peer collaboration, U Ethical encourages all portfolio companies with exposure to modern slavery risks to implement robust operational and supply-chain management strategies.

We believe that as community expectations increase for companies to exercise ethical sourcing and supply chain standards, the focus on this important component of ESG policy will demand a more rigorous response from the investment industry and the corporate sector, as well as in consumer behaviour. Our approach in heightening awareness is designed to increase corporate transparency and responsibility, which contribute to both corporate and policy action on modern slavery issues. Where relevant, we provide comments to policy submissions with the aim of driving reforms that may better address this systemic challenge.

In addition to the direct overview and analysis of our portfolio exposures, U Ethical collaborates with industry peers to raise awareness of modern slavery considerations and to maximise the impact of efforts to alleviate its consequences: U Ethical is an active participant to the Investors Against Slavery and Trafficking (IAST) and Responsible Investment Association of Australasia (RIAA)'s Human Rights Working Group.

5.2.2 Investment products and operations

With the aim of delivering sustainable long-term investment outcomes, our ethical investment framework integrates ESG factor analysis alongside quantitative and qualitative assessment across all asset classes in which we invest. Through our investor stewardship, we actively encourage portfolio companies to adopt best-practice ESG standards, which include alignment with international human rights charters, frameworks and industry best-practice. Extensive ethical and ESG screening takes place before any investment decisions are made. The investment team discusses emerging ethical and ESG controversies as they arise, including any need to address specific issues with a particular company.

Our ESG research incorporates a range of human rights factors and assesses company performance against these based on their materiality to the business. We expect the companies that we invest in to meet internationally recognised human rights standards and to accept responsibility for this throughout their supply chain. When defining our investable universe, we firstly screen out ethically misaligned companies and companies with severe controversy cases (labelled red flags by MSCI ESG Research). Following this preliminary evaluation, we run detailed screens to further investigate possible risk exposures and harm that may be caused to people and/or local communities. U Ethical's modern slavery/human rights screen spans controversy cases, an overview of business segments and regional exposure (low-medium-high) and a diversity of factors that cover, among others, labour management practice, health and safety, controversial sourcing, corruption and instability. This analysis only touches on tier-one supply chain risk exposures. In order to deepen our due diligence, in early 2021 we joined Investors Against Slavery and Trafficking (IAST) to advance engagement discussions with portfolio companies. IAST released its third report in August 2023[10]. (**IAST-APAC-Annual-Report-2023.pdf (iastapac.org)**) Further details on our engagement activities, including the collaboration with IAST, can also be found in U Ethical's FY23 Stewardship Report and relevant blogs on U Ethical's website[11]. **https://uethical.com/uploads/resources/Stewardship-Report-23_24.pdf**

As part of our investment and stewardship policy and approach, U Ethical engages with portfolio companies where it becomes aware of moderate modern slavery issues and aims to monitor that there is adequate remediation and process improvement activities to deal with these issues.

This will include firm communication with company management noting our concerns and the actions expected to be taken, as well as looking to set up a meeting to discuss those concerns whether in-person, or via video call or teleconference.

The team will continue to monitor these activities over six months to a year and will continue engagement if progress has been made unless there is no progress or unsatisfactory conduct.

If the response continues to be unacceptable, U Ethical will then either:

- seek further engagement with the company through collaborative efforts with industry peers and working groups, such as the Responsible Investment Association of Australasia (RIAA) and the UN Principles for Responsible Investments (UNPRI), to advocate or lobby for further change. This approach has proven successful in the

past and may incorporate public campaigns, support for shareholder resolutions or continued advocacy; or

- as existing shareholders, exercise opportunities to query senior management through shareholder briefings and vote at Annual General Meetings (AGMs); or
- exit the share register if the position is seen as immovable and place that company on the excluded companies list.

5.2.3 Supply chain risk assessment – Direct operational exposure

We apply a practical approach to assessing, prioritising and mitigating salient modern slavery risk where we have the highest spend in our business. We identified and categorised 10 tier-one suppliers and service providers ("suppliers") in the financial year to 30 June 2024. We analysed, to varying depths, the risk clusters based on industry sectors, operating jurisdictions, business model, products or services provided and spend. The risk indicators applied were:

- identifying whether a supplier's operations take place in repressive regimes;
- reviewing publicly available media/legal reports that indicated labour exploitation by our suppliers;
- engaging with our suppliers with whom we spend more than $50,000 by requesting the completion of our detailed questionnaire, in which we request supporting documentation.

5.2.3 Geographic risks

The majority of our tier-one suppliers operate in low-risk countries. All top ten suppliers by spend (transaction >$50k) operate domestically i.e. Australian head office is either in Melbourne or Sydney. Six of these tier-one suppliers have offices in multiple locations, with head offices in either the UK or US, with the remaining suppliers being based solely in Australia. Eight of the ten tier-one suppliers are reporting entities under the Modern Slavery Act 2018 (Cth), one under Modern Slavery Act 2015 (UK), one under both Australian and UK acts, and the one remaining supplier is not obligated to report under any modern slavery conditions.

5.2.3.2 Product and service types

U Ethical's top ten suppliers provide products/service types in relation to accounting/payroll, IT services, custody, unit registry, auditing and consulting, employment placement, legal services,

technical services, and insurance. The modern slavery risks associated with these suppliers has been assessed as low.

Our largest spend relates to the administrative and support services provided by Synod Ministries and Operations, including property services (building management, cleaning, office supplies and furniture), finance services (payroll), people and culture services and IT services. We acknowledge the Synod's efforts in ensuring it has appropriate processes and procedures to assess and minimise modern slavery risks within its operations. Please refer to section 3.1.1 Synod Ministries and Operations for further details.

U Ethical's remaining suppliers are in education; human resources; consulting; telecommunications; and financial services. The modern slavery risks associated with these suppliers is also assessed as low.

5.2.3.3 Individual risks

We conducted a media search on U Ethical's tier-one suppliers by using publicly available information and the MSCI rating. There were no adverse results identified which would be expected as our tier-one suppliers are professional specialist firms. U Ethical considers the risk of modern slavery existing within our first-tier suppliers domiciled in Australia, a country with a low prevalence for modern slavery according to the Global Slavery Index (**https://www.globalslaveryindex.org/**), to be low.

We have adopted the same approach as per previous years by sending a modern slavery risk questionnaire to our top ten suppliers by spend. The questionnaire was divided into four main categories: 1) sector and industry employment population; 2) entity and structure; 3) products and services; and 4) geography. Unfortunately, this year two suppliers were not willing to complete the questionnaire, however they did provide a copy of their current modern slavery statement plus various supporting documents. Those two suppliers are large multinational organisations which provide technical and data services. The remaining eight suppliers provided their completed questionnaire and supporting documents where required. Of the ten suppliers, nine have their modern slavery statements on their websites and the remaining one is an Australian based firm which do not require a statement, as per the *Modern Slavery Act 2018* (Cth). Those firms, who fall under a Modern Slavery requirement, have provided appropriate information in relation to codes of conduct either via their modern slavery statements or via confirmation as part of their response to our questionnaire, and in some instances by providing relevant policies.

5.2.3.4 Risk assessment result

After considering each of the above elements all top ten (10) suppliers have been identified as having a low modern slavery risk rating.

Each of U Ethical's suppliers who are required to have modern slavery preventative measures in place have implemented a vendor/supplier code of conduct which their suppliers are always required adhered to. If there is any non-compliance of the standards, then disciplinary action will be taken. Where there is no vendor/supplier code of conduct annual critical and high-risk suppliers are reviewed against Modern Slavery Act requirements and if required action is taken to rectify the situation.

Eight suppliers also have specific training in place for modern slavery, whereas one supplier has modern slavery woven into their general training.

Having these codes/risk management steps, and training in place adds weight to the commitment from our suppliers in preventing modern slavery.

5.2.4 Operations and supply chain

U Ethical complies with Australian employment laws and as such we have identified minimal modern slavery risks in our internal operations.

Our third-party procurement and outsourcing comprise mainly:

- fund services, such as custody and fund administration, and unit registry;
- professional services, such as legal, audit, tax, design and IT;
- other services, such as advertising, business travel; and
- administrative and support services provided by Synod Ministries and Operations.

The size and nature of our business as a regulated financial services company means we employ targeted strategies and formal controls when outsourcing material business activities, which includes, but is not limited to:

- pre-appointment - supply chain due diligence check, risk assessment and legal contracts review, including modern slavery risks considerations; and
- ongoing monitoring of performance against agreed standards set out in the service agreements, including annual review of suppliers who have been assessed as having high risk modern slavery practices.

5.3 Steps taken for remediation and improvement

As part of our continuous commitment to be ethically driven and socially responsible, a number of steps have been taken to improve our processes to identify, mitigate and manage any modern slavery risks across both our investments and supply chain.

We anticipate that, as attention on this topic grows and transparency improves, we will continue to strengthen our assessment of business practices and engage with our investment portfolio companies where we believe more resolute action is required.

5.3.1 Investments (Indirect exposure)

5.3.1.1 Our review process

Our ethical investment policy specifically mandates the review of companies for unacceptable business activities including existing and historical human rights and modern slavery-related controversies.

We integrate the evaluation of environmental, social and governance (ESG) factors into our investment process to assist us in managing this risk. The investment team uses a wide range of external resources, such as MSCI ESG Research, sell-side broker research, company reports, management meetings and industry body publications. A core element of our ethical / ESG review is to examine labour management and sourcing practices, ESG controversies, corporate alignment with labour/human rights charters and conventions, and supply chain considerations.

5.3.1.2 Our action on modern slavery

We have an independent board that has delegated responsibility to the investment committee to oversee the investment team's activities and the effective implementation of the ethical investment policy. We also have an ethical advisory panel including independent experts which is consulted on key ethical concerns on a quarterly or semi-annual basis.

We are a participant of Investors Against Slavery and Trafficking (IAST) and also a certified B Corporation. B Corps are businesses that strive to meet the highest standard of verified social and environmental performance, public transparency, and legal accountability to balance profit and purpose.

We also collaborate with UCA JIM Cluster on issues relating to human rights and modern slavery where our investment activities, including stewardship and engagement, coincide.

This may take the form of joint meetings between U Ethical and JIM Cluster, joint submissions to government and regulators where applicable and other work.

CASE STUDY: IAST APAC

IAST is a collaborative group of investors that engage with companies in the Asia-Pacific region to promote effective action in finding, fixing and preventing modern slavery in operations and supply chains. U Ethical is a member of IAST because we believe that collaborative action can drive enhanced outcomes with companies. U Ethical has participated in virtual meetings organised by IAST with companies including Woolworths and JB HiFi, among other companies. These meetings are an opportunity to not only gain a fuller picture on how companies are acting to find, fix and prevent modern slavery, it is also an opportunity to press for enhancements where they are identified.

5.3.1.3 Ongoing process

Where we become aware of companies with moderate modern slavery issues, we will seek to meet with company management, in-person or via technology, to express our views. We will aim to monitor that there is subsequent, adequate remediation and process improvement to address these issues.

Where we become aware of companies with very severe modern slavery issues, we will again seek engagement for the purpose of reparation and remediation.

Our investment team will monitor these activities over the following six months to a year and will continue to engage with the company if progress has been made but not to a satisfactory level. If the response continues to be unacceptable, we will then either:

1. seek further engagement with the company through collaborative efforts with industry peers and working groups, such as RIAA and UNPRI, to lobby for additional change (this approach has proven successful in the past and may incorporate public campaigns, support for shareholder resolutions or continued lobbying); or

2. as existing shareholders, query senior management through shareholder briefings and vote at Annual General Meetings (AGMs); or
3. exit the share register and place the company on the excluded companies list.

5.3.2 Supply chains (Direct exposure)

We map our supply chain to identify general modern slavery risks. We engage with or conduct research on our suppliers to identify our specific modern slavery risks.

Our outsourcing and procurement policy is embedded with modern slavery risk management throughout the process, which enables a risk-conscious view and transparency in our supply chain, including:

- adopting the 'probity' principles;
- ensuring we continue to apply our code of ethics and conduct in our business practices;
- setting due diligence criteria and steps, pre and post appointment, to identify, monitor and mitigate modern slavery risks;
- adding long-term or material outsourcing and procurement activities into our annual compliance monitoring program; and
- reviewing new proposals against the updated risk procedure in the outsourcing policy.

With regard to the degree of causation or linkage to potential modern slavery risks, we acknowledge the need to collaborate with and collect information from our main suppliers enabling us to evaluate our tier-one supply chain more effectively.

As part of our continuous commitment to identify and combat modern slavery risks, we:

- apply the outsourcing and procurement policy and processes and monitor the outcomes;
- engage with suppliers to identify and mitigate such risks; and
- improve existing supplier agreements through the inclusion of modern slavery prevention obligations.

CASE STUDY: EMPLOYEE TRAINING ON THE SIGNS OF MODERN SLAVERY

During FY23, U Ethical designed a bespoke and applicable modern slavery risk awareness training module that is mandatory for our team and provided via our online education platform. The training utilises information from Walk Free[1], an online short documentary piece on modern slavery, and the Salvation Army, Uniting Church in Australia Synod of Victoria and Tasmania and Dignity in Work for All to define modern slavery, explain our direct and indirect exposures and reiterate our action in the event of identifying an exposure to direct or indirect modern slavery.

[1] www.walkfree.org

We will continue to evolve our approach and criteria in assessing our suppliers and service providers' risks, especially for modern slavery. This includes:

- conducting ongoing monitoring;
- developing risk indicators to measure our effectiveness in preventing modern slavery in our business and supply chain; and
- identifying improvement opportunities within our supplier and service provider framework.

6. Uniting AgeWell

Annual Gross Revenue for FY24 $ 395,170,776
Required for statement submission

6.1 Introduction

As an organisation of the Uniting Church in Australia, Uniting AgeWell Limited is a not for profit with a long and extensive history of providing residential and community services to older Australians across Victoria and Tasmania.

Uniting AgeWell is a Public Benevolent Institution regulated by the Australian Charities and Not for Profits Commission. The company is an Approved Provider of aged care services under the Aged Care Act 1997.

Uniting AgeWell service options include:

- Residential Care
- Independent and Assisted Living
- Home Care
- Social Support
- Allied Health and Therapy programs
- Respite and Carer Support

Uniting AgeWell also wholly owns a subsidiary company, Guardian Network Pty Ltd, which provides in-home support services. This statement is a consolidated statement that covers both Uniting AgeWell and Guardian Network Pty Ltd.

The organisation's focus is on creating both a good life and quality outcomes for older people. The focus informs the work done every day and is at the heart of our organisational decision-making.

Uniting AgeWell's reason for being is to create caring communities where every older person feels welcome and supported in ways that matter to them.

Our 4,300 staff and 600 volunteers are dedicated to providing the highest quality care and support to clients to enable them to live well with choice and peace of mind, and to live satisfying and fulfilling lives, where they can be active and connected members of their community.

Uniting AgeWell employs people in 152 different roles – from hotel services and administration to nurses, chaplains, and care workers – with 72 per cent of staff directly supporting clients in care roles. Uniting AgeWell celebrates diversity and has inclusive work practices and policies to ensure our staff and clients always feel welcome, valued, and respected.

Uniting AgeWell Limited is governed by a Board of Directors. Working with the Chief Executive Officer and Senior Executive Team, the directors help shape the organisation's direction through governance and stewardship and provide the highest standards of ethical conduct and practice. Board directors sit on various sub-committees that advise on key governance areas. These include: Audit and Risk, Finance and Clinical Governance.

Find out more about what we do at: **unitingagewell.org**

6.2 Assessment of modern slavery risk in our supply chain

6.2.1 Measuring and managing our supply chain risks

Uniting AgeWell is committed to measuring, managing, and eliminating any human rights violations in our supply chain through:

6.2.1.1 Supplier Sustainability Principles

To be published in 2024-25, to reflect our strong commitment to conducting our supply chain management responsibly and sustainably and setting minimum expectations for supplier compliance with human rights laws as they pertain to employees and business operations. In addition, as part of our broader approach to sustainability, we seek to engage and encourage suppliers and partners who share this understanding and commitment.

6.2.1.2 Risk management and due diligence

Uniting AgeWell has established risk management processes to include risk-based supplier segmentation to identify suppliers that may pose more significant human rights/modern slavery risks. Supplier agreement templates have been updated to refer specifically to the Commonwealth Modern Slavery Act 2018, and suppliers contract on these terms.

6.3 Processes and controls to mitigate modern slavery risks

6.3.1 Our position on modern slavery

As the Attorney General's Department has noted on its website, modern slavery is a term used to describe serious exploitation and it describes situations where offenders use coercion, threats, or deception to exploit victims and undermine their freedom. Practices that constitute modern slavery can include, human trafficking, slavery, servitude, forced labour debt bondage, forced marriage and the worst forms of child labour.

Uniting AgeWell rejects any form of modern slavery. We are committed to implementing and enforcing effective systems and controls to ensure it does not occur within our own business or supply chains. Wherever we operate, we respect the human rights of our employees, clients, suppliers, and business partners, and we aim to identify and manage any risks related to these rights.

6.4 Steps taken for remediation and improvement

6.4.1 Measuring and managing our workplace risks

Uniting AgeWell has initiated monitoring and review of our quality and risk frameworks, policies, systems, and processes. We are dedicating resources to measure, manage and eliminate any human rights violations in our workplaces and suppliers through:

6.4.1.1 Policies and governance

Our board leads our directorates to implement strong corporate governance, ensuring all decisions and actions are based on transparency, integrity, responsibility, and performance for long-term sustainability.

6.4.1.2 Ethics and conduct

We recognise that our employees, contractors, directors, and agents must maintain a compliant and ethical approach to business practices. We are committed to dealing honestly and fairly with our suppliers and managing the risk of unfair labour practices.

6.4.1.3 Employee training and awareness

Informing our teams of their obligations to uphold laws, regulations, codes, and/or standards as applicable. In addition to existing training modules, we have trained procurement staff to address the identification and management of human rights abuses by suppliers.

Steps taken to date

- Annually, we profile our supplier register to identify high-risk suppliers and industry sectors. In addition, we have sought attestations, reports and evidence from our top 10 suppliers as to modern slavery investigations and compliance practices adapted.
- We promote awareness and active assessment of modern slavery risks to all staff who are involved in procurement activities.
- We ensure supplier contracts include appropriate clauses relating to anti-slavery laws.
- We continue to investigate high-risk categories of spend. The focus in 2024 has been on seafood and solar panel sourcing to ensure suppliers minimise the risk that forced labour is used in the supply chain.
- We continuously engage with suppliers to identify and mitigate modern slavery risks.
- The Uniting Care Procurement Hub, in which Uniting AgeWell is a participant, assesses modern slavery risk as part of supplier selection criteria.

Our future plans

We commit to continuously improve our processes to identify and combat modern slavery risks. In doing so, we plan to:

- develop Supplier Sustainability principles to incorporate into the Procurement Policy, which includes modern slavery as a critical pillar assessment alongside value-for-money decision-making when purchasing.
- develop key performance indicators to measure effectiveness in preventing modern slavery in any part of our business or supply chains.