

2022 Modern Slavery Statement

1 January to 31 December 2022

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. VMCH sees its commitment to moving to the elimination of modern slavery as an integral part of its mission. We aim to ensure that decisions made by VMCH do not allow modern slavery to exist within our operations, business relationships and extended supply chains.

Whilst this statement focuses on reporting on our legislative requirement, we recognised that modern slavery risks are part of its broader ESG framework, because of the link between modern slavery and climate change. It has been noted that "... the impacts of climate change worsen existing economic and environmental vulnerabilities, and deepen exclusion and marginalisation, leading some to fall into conditions of debt bondage, labour and sexual exploitation, and conditions analogous to slavery. Many of these workers, in turn, are employed – directly and indirectly – in activities that cause environmental devastation, resulting in higher emissions that further fuel climate change."¹

This Statement is our third 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 2022, 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 2022 and beyond to identify and address modern slavery within our operations and supply chains. Our approach includes a commitment to continuous improvement as we continue our education and awareness of modern slavery risks.

This Statement has been prepared and reviewed by VMCH's Modern Slavery Working Group, the VMCH Executive and the Board's Quality Compliance & Risk Committee and approved by VMCH's Board on 27 April 2023.

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 2022.

Our membership of ACAN is an important part of the joint approach Catholic organisations continue to take to support the work to eliminate modern slavery which Pope Francis has described as "an open wound on contemporary society, a wound on the body of Christ and a crime against humanity."

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

Julien O'Connell A.O.
VMCH Board Chair

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1

Criteria 1 and 2: The Reporting Entity and our Structure

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

1.1 About VMCH

VMCH is a Catholic profit for purpose organisation, providing services to over 9,000 people across Victoria.

Our Mission is to continue the caring ministry of Jesus by creating choices, offering hospitality, and building inclusive, compassionate, and 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, aged care and retirement living services.

Our values of compassion, respect, integrity, collaboration and partnerships, stewardship and inclusion are not just words to us, they guide us in everything we do.

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



1.2 Living our Mission

Our Mission is central to who we are and what we offer, it comes to life through our everyday actions and in our work. We are called to really listen deeply. We hear the needs of those we care for and we take time to discern what we can do to add meaning. We stay true to whom we are by supporting people and families to live their best lives, providing a place to call home and spaces to learn and grow.

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

Our Values



Respect

We recognise and respect the dignity and uniqueness of each person.



Compassion

We truly care and are always open to the needs of others.



Integrity

We are honest and transparent in all our dealings and accountable for all our actions.



Collaboration and partnerships

We empower people, realise potential and maximise the outcomes from our work.



Inclusion

We are welcoming, inclusive and responsive in our hospitality and services.



Stewardship

We value the resources for which we are responsible, and commit to their effective and efficient use, to achieve our Mission.

1.3 2022 Modern Slavery Risk Management Initiatives

In 2022 we continued our work on increasing awareness through communication, online learning and developing networks of champions throughout the organisation as well as commencing our work with our suppliers to understand modern slavery risks within our supply chain. We built on the work completed in previous years, continued our membership with ACAN and placed more rigour around our commitments. We implemented several initiatives and reached some key milestones on our Modern Slavery journey.

These are summarised below.

- Enhancing risk management strategies as they relate to modern slavery.
- Establishing processes to manage procurement and supply chain including inclusion in our tender processes.
- VMCH completed further analysis of our supply chain with a view to deeper engagement with our suppliers. We invited our top 50 suppliers to join Supplier Ethical Data Exchange (Sedex) as part of this analysis.
- Invited specialist speakers on Modern Slavery to our working group and champions network meetings to discuss their practises and knowledge on Modern Slavery.
- Identified gaps within our organisation to develop continuous improvement actions to address the gaps.

Further detail of the above will be discussed in more detail in the body of this report.

1.4 Our Plans for 2023

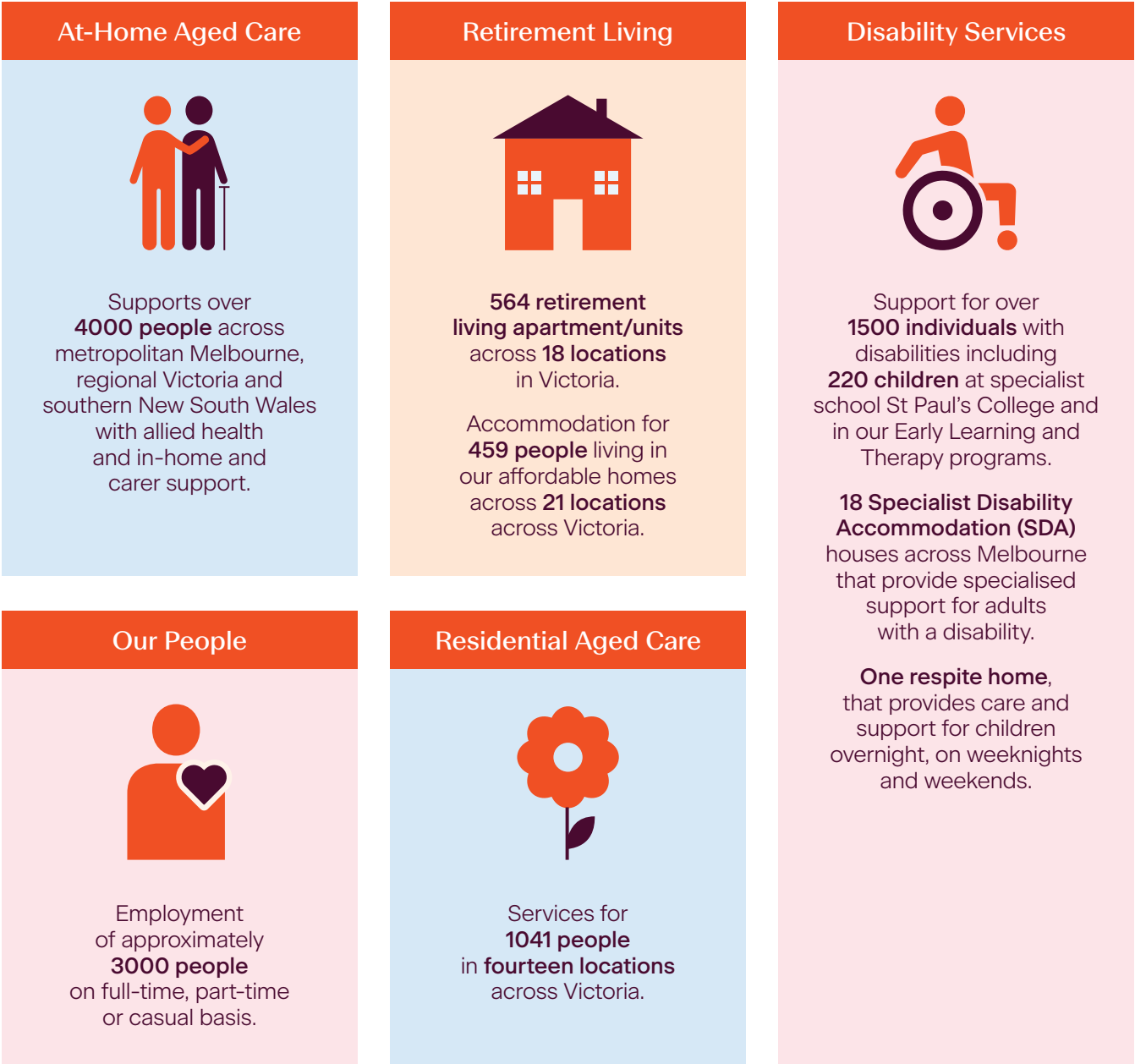
VMCH takes a continuous improvement perspective to its approach to modern slavery risks. Our plan for 2023 is to build on the work undertaken in previous years. We will further our work within Sedex and continue to leverage this system, by deepening our engagement with our tier one suppliers and key internal stakeholders. We will also look at solidifying business and management systems that will enhance our ability to identify and mitigate modern slavery risk.

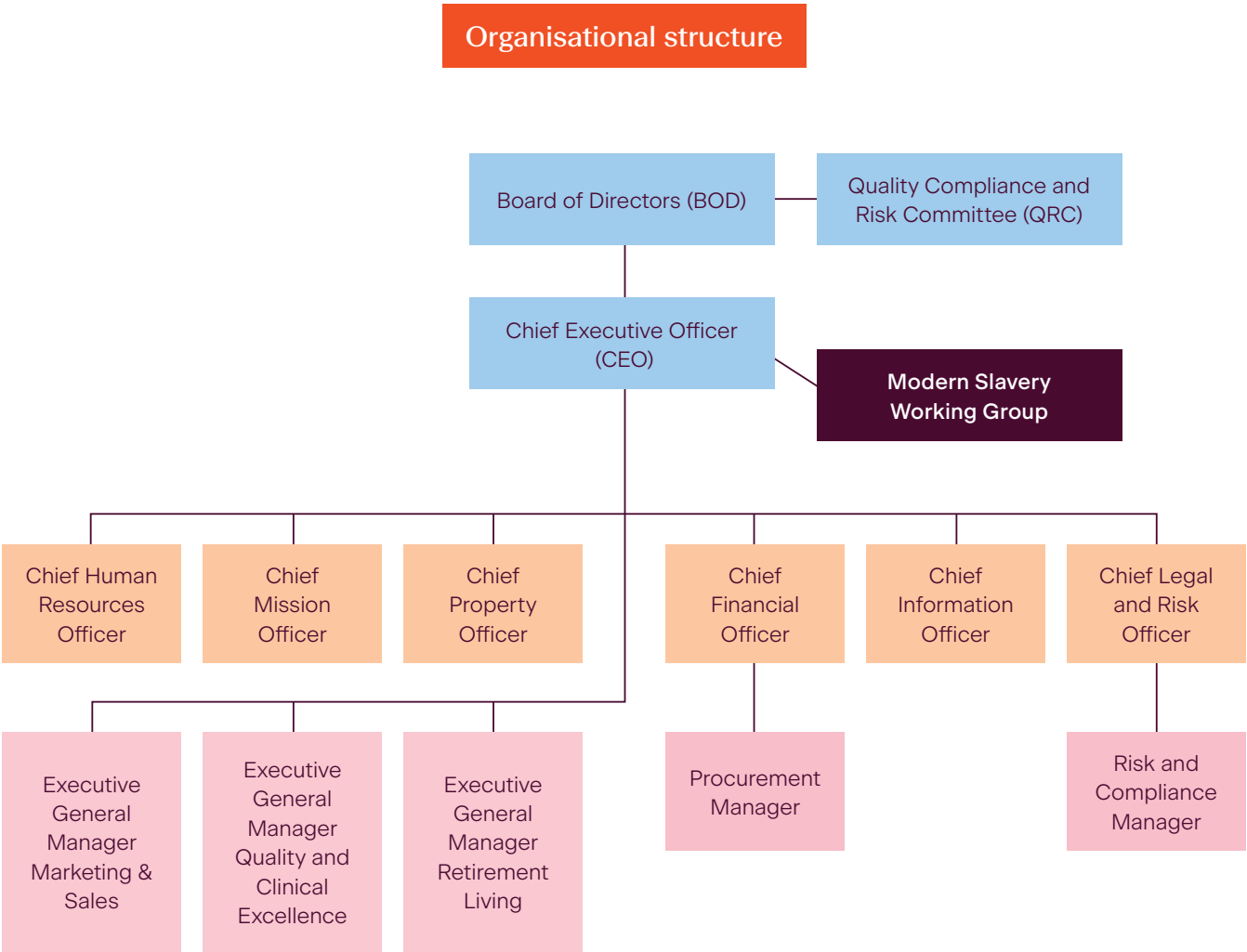
Further Commitments for the future are highlighted in Section 6.



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 operation contribute to the wellbeing of many communities, in diverse and sometimes, surprising ways. Our staff are dedicated to supporting over 9,000 people across metropolitan Melbourne, regional Victoria, and southern New South Wales. We offer a vast range of services including residential aged care, affordable housing options, community and home-based senior support, disability support, carer support and education.





Our structure includes a procurement and risk function which provides advice and support to the operational areas.

1.6 Governance Structure

Our approach to eradicating modern slavery is embedded in VMCH's broader governance framework. VMCH's 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.

A Modern Slavery Working Group (Working Group) was established in 2020 and continued to meet quarterly throughout 2022. The objectives of the 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.
- Ensure VMCH meets the requirements of the Modern Slavery Act 2018 (Cth).

The Working Group consists of participants with a diverse range of relevant experience and expertise from across the organisation including procurement, finance, operations, legal, work health and safety, information technology, mission, people and culture and facilities management. It is chaired by the Chief Legal & Risk Officer and Company Secretary (who is also VMCH's Modern Slavery Liaison Officer (MSLO) and representative on the ACAN). The Working Group meets regularly and reports to the Executive on the work undertaken.

In 2021, a network of modern slavery champions was established, and this group continued to meet in 2022. The modern slavery champion network represents staff throughout the organisation who have some responsibility for procurement and other services and would be aware of any potential modern slavery issues.

The group is a community of practice with a strong interest in upholding VMCH's position in relation to modern slavery and communicating about modern slavery to the broader VMCH community. In addition, it provides a forum to receive and provide feedback and information on modern slavery to the group. The group has invited many external modern slavery experts throughout 2022 to present to the group. This has provided the group with more awareness and tools to further support VMCH in navigating its modern slavery journey.

1.7 Our Strategic Plan

Modern slavery fits within the VMCH Strategic Plan 2020–2023, under the headings:

3. Operational Effectiveness

- 3.4 Continuing to strengthen and invest in our governance, risk, and compliance practices.

4. Investing in our people

- 4.1 Continuing to develop the capabilities of our people through a dynamic orientation, induction and formation process that supports them to uphold our culture of quality care and Catholic values.

1.8 Supply Chain

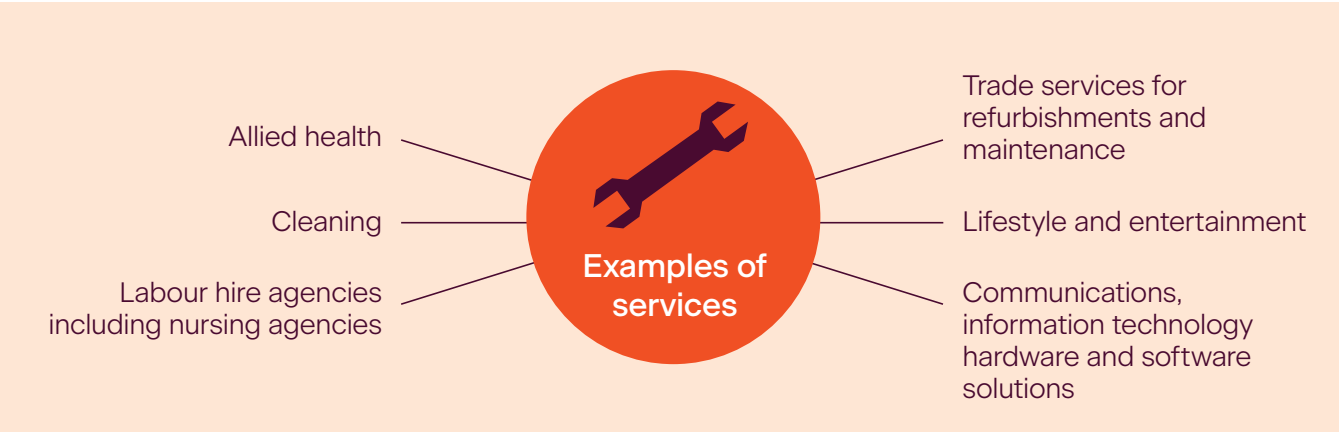
VMCH has 4,469 active suppliers, who supply a range of goods and services to enable VMCH to maintain our operations and provide excellent care to our clients, residents, and students.

Greater emphasis has been made within our contractor space with more vigorous checks in place for hiring. VMCH also has a central system to store contracts for suppliers.

Our supply chain is diverse and encompasses small local businesses through to national and global businesses 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.



2

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

2.1 Modern slavery risk factors

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

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

2.2 Understanding modern slavery within VMCH's context

In 2022, 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. As mentioned, we reached out to our top 50 suppliers and invited them to join Sedex.

As part of our 2023 work, we will continue to work with all our suppliers to encourage them to join Sedex.

All staff involved in purchasing and procurement decision making have undertaken the available ACAN modern slavery training modules. Other interested staff members are actively encouraged to increase their awareness and understanding on the impacts of modern slavery by undertaking the modules.

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

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

As part of ACAN, VMCH has accessed the work and resources made available by ACAN, this includes Sedex.

2.3 Our COVID-19 Response

Due to the ongoing challenges from 2020 to 2022 COVID-19 restrictions and lockdowns, the situation resulted in shifts in production, limited distribution, and shortages of some essential items. It also affected VMCH's ability to achieve the targeted vendor engagement on modern slavery. Education continued to be the focus in 2022.

VMCH's organisational Critical Incident Team (CIT) continually monitor the COVID-19 situation. Our procurement team was an integral part of the CIT and was responsible for managing the additional sourcing requirements which is required, especially for personal protective equipment (PPE).

Our commitment to providing care to our customers and our team providing frontline support required a rapid response to sourcing additional medical and consumable items. We continuously worked closely with our preferred suppliers to manage and communicate the changing supply position and established new supply relationships when required.

The pressures created by mitigating the risk to our customers and staff from COVID-19 meant that some of the work we would have undertaken in assessing and mitigating the risk of modern slavery during the year, was delayed, particularly in the case of face-to-face engagement with suppliers.



2.4 Modern slavery Gap Analysis

VMCH's used ACAN's Bridge the Gap tool to assess our progress on modern slavery. The table below measures our journey from August 2022 to December 2022.

Bridge The Gap Assessment

		Aug-22		Dec-22	
1. ACAN Gap Review		Score	Avg	Score	Avg
Management	Governance	3.0	2.8	4.0	3.8
	Commitment	3.0		4.0	
	Business Systems	3.0		4.0	
	Action	3.0		4.0	
	Monitoring and Reporting	2.0		3.0	
Risk	Risk Framework	4.0	3.3	4.0	3.5
	Operational Risk	4.0		4.0	
	Identifying External Risks	4.0		4.0	
	Monitoring and Reporting on Risk	1.0		2.0	
Human Resources and Recruitment	Awareness	3.0	3.3	4.0	4.0
	Policies and Systems	3.0		4.0	
	Training	3.0		4.0	
	Labour Hire/Outsourcing	4.0		4.0	
Stakeholder Attitude	Customer Attitude	2.0	2.8	3.0	3.5
	Information Provision	3.0		4.0	
	Feedback Mechanism	2.0		3.0	
	Worker Voice	4.0		4.0	
Procurement and Supply Chain	Policies and Procedures	3.0	2.6	4.0	3.6
	Contract Management	3.0		4.0	
	Screening and Traceability	2.0		3.0	
	Supplier Engagement	3.0		4.0	
	Monitoring and Corrective Actions	2.0		3.0	

Through the analysis, we identified the need for:

- Enhanced procurement policies and procedures,
- a more standardised approach to procurement across VMCH and
- enhanced induction material to include information on VMCH's commitment to eradicating modern slavery so that new hires had a greater awareness of VMCH's work and position on mitigating modern slavery.

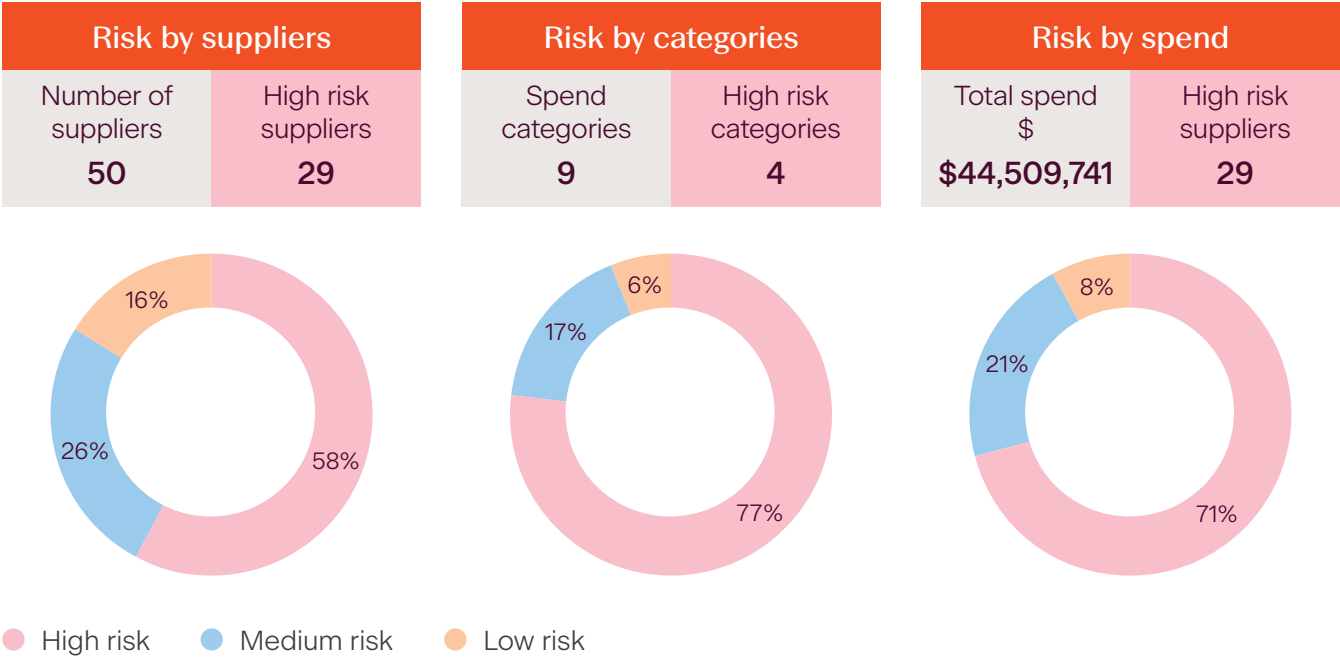
All these actions were undertaken.

2.5 Operational and Supply Chain Risks

VMCH recognises that modern slavery risk may occur in our organisation and extended supply chain. Therefore, we monitor our supplier base for high-risk suppliers and categories to identify risk factors.

VMCH analysed its top 50 suppliers (see the table below) and identified that of the top 50 spend suppliers, 29 were categorised as potentially high risk. The risk was assessed based on the supplier category. There are four high risk categories highlighted:

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



*Please note the data is shown over a six-month period up to September 2022.

3

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

The focus for the initial phase of modern slavery risk mitigation in 2020 and 2021/22 was on establishing the foundations for further work. Actions taken to assess and address modern slavery risks are outlined below.

3.1 Governance Framework

- VMCH became a member of the ACAN with a modern slavery liaison office (MSLO) representative. ACAN is a network of over 45 Catholic entities. VMCH's MSLO attended ACAN conferences and monthly meetings. These meetings aimed to understand the potential modern day slavery risks and provide member organisations, including VMCH, with resources to assist in the modern slavery mitigation plans.
- The VMCH Board reviewed its risk appetite statement. Specifically, it included the Board's position on modern slavery, namely, that VMCH has no appetite to engage in, or engage with, any form of modern slavery.
- A Modern Slavery Working Party continued to meet to: provide input and advice to VMCH on issues related to modern slavery; actively support the development and implementation of VMCH's modern slavery action plan; assist VMCH determine priority actions to be undertaken and establish annual goals and targets; monitor and review actions taken to assess and address modern slavery risks and evaluate their effectiveness; and ensure VMCH meets the requirements of the Modern Slavery Act 2018 (Cth).
- The Modern Slavery Policy which, together with the Protected Disclosure (Whistleblower) Policy, Procurement Policy, Fraud and Corruption Policy, Employee Grievance Procedure, and Bullying and Discrimination Prevention Policy, provide a framework to ensure direct risks of modern slavery are effectively managed within our operations. Each of these has a continual review process into which finding and further treatments for modern slavery can be incorporated to ensure best practice.
- VMCH began utilising the Sedex tools and services (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 to manage modern slavery risks within our supply chain. The top 50 suppliers were invited to respond to surveys on questions relating to modern slavery risk, we plan to reach out to the balance of our suppliers in 2022. These responses will be analysed as part of VMCH's ongoing work.
- The supplier code of conduct was in place.
- The ACAN Supplier Engagement Strategy Guide was adopted following the supplier engagement workshop in late 2020 undertaken with key VMCH stakeholders and ACAN.
- The ACAN supplier surveys were also completed by our suppliers and assessed by 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 was developed with the assistance of ACAN and introduced into VMCH's online training portal for employees and volunteers. All the modern slavery champions have undertaken is online training.
- Modern Slavery online training is included in the suite of modules directors are required to complete.
- Webinars and training were made available to suppliers.
- Webinars where leading experts on Modern Slavery presented about their experiences were accessed by suppliers and VMCH staff.
- The Modern Slavery Working Party took part in a training workshop to assist in engaging with suppliers.

3.4 Communication

- VMCH has used its multiple communication channels/mediums with staff to raise awareness of modern slavery issues so that staff are informed about and can be aware of modern slavery issues. For example, on 8 February VMCH highlighted to all staff, through electronic media, the Feast Day of St Josephine Bakhita – the patron saint of victims of modern slavery and human trafficking. On this day we pray for all those affected by these crimes, and the people that volunteer and work to eradicate them.
- Modern slavery champions were identified and came together as a group of staff who would be most likely to order goods or services and would need to be aware of, or identify, potential modern slavery issues.

3.5 Procurement and Operational Actions

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

3.6 Investments

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

3.7 Remediation Action

- VMCH is committed to providing appropriate and timely remediation to individuals affected by modern slavery in accordance with the need of the victim and relevant laws and guidelines, including the UN Guiding Principles on Business and Human Rights and the Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities.
- Remediation includes taking action to address harm to individuals impacted by modern slavery and to mitigate future risks. Due to the complexity of remediation, specialized resources are required to ensure the best outcomes for individuals affected by modern slavery. To address this, Domus 8.7, a not-for-profit, has been established to provide remediation services and a confidential advisory service to individuals affected by modern slavery.
- Domus 8.7 will triage cases and refer victims to internal or external specialists who can provide support, advice and assistance regarding legal, social, and human rights responses to cases of modern slavery. It will also partner with international organizations to ensure supply chain remedial action and prevention is available. Additionally, Domus 8.7 will help build the capacity of Catholic social services and parishes to address the issues and risks of modern slavery, engage in policy advocacy and research, and engage with businesses and suppliers.
- Through Domus 8.7, VMCH aims to help individuals impacted by modern slavery to achieve outcomes that can be reported and used to continuously improve risk management and operational response. Any grievances related to modern slavery will be mediated through Domus 8.7, and VMCH is committed to working with any entity that caused harm to ensure remediation and prevention of recurrence.
- To recognize the causes of modern slavery and escalate poor labour practices and unsafe working conditions, both staff and stakeholders of VMCH are being equipped with the necessary skills to spot cases when they present themselves.
- In 2022, VMCH did not find any cases of modern slavery in its operations and supply chains. This may have been due to the risk assessment still being too unspecific and in need of fine tuning. Once proper channels to identify victims are established and when suppliers are being probed in greater detail, this may change.
- One case that came out last year that indirectly affected one of our suppliers Bunzl, who includes Ansell as one of their suppliers. See Case study on the following page.

3.8 Ansell Case Study

On August 24, 2022, ABC published an article alleging that Ansell was knowingly profiting from slave labour at a Malaysian supplier. The article highlighted the exploitation of Bangladeshi and Nepalese migrant workers who were subjected to alleged slavery-like conditions, such as having their identity papers taken away, paying excessive recruitment fees to agents, experiencing physical punishment, working long hours, and being exposed to dangerous substances, poor food, and accommodation. The US Customs and Border Protection found ten out of eleven United Nations indicators of forced labour and slavery present at the supplier.

As a member of the Australian Catholic Anti-Slavery Network (ACAN), VMCH became alarmed and decided to engage with Ansell in a unified approach through ACAN. ACAN met with Ansell representatives twice in 2022, on September 7 and December 8, and has scheduled further meetings for 2023, the first of which is on February 21.

The engagement is intended to foster collaboration with Ansell to remove the risk of slavery in their supply chain. ACAN discussed issues related to supplier compliance programs, supplier capacity building, recruitment fees in migrant worker departure countries, wages, accommodation, grievance mechanisms, victim support, and consequences.

They also discussed establishing regular update meetings between ACAN and Ansell, establishing a joint commission or working group to oversee progress, requesting an observer seat at the Responsible Glove Alliance meetings, inviting ACAN to attend some human rights due diligence or social audits on-site, developing joint capacity building projects, and exploring alternative sources for materials, production locations, and even reshoring of production.

4

Criteria 5: Effectiveness Assessment

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

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

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



5

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

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

6

Criteria 7: Other – Future Commitment

VMCH has several actions planned for 2023 that directly relate to the identification, management, and mitigation of our risks of modern slavery:

- Continued membership of ACAN to leverage best practice materials and approaches.
- Further roll out of the modern slavery online training to employees to raise awareness of risks, and how to identify and confidently report incidents.
- Any new tenders (including request for tenders and requests for proposals) will include a mandatory compliance requirement that the tenderer complies with VMCH's Modern Slavery Policy as part of the final agreement.
- Further utilise the Sedex platform to further understand the modern slavery risks within our supply chain.
- Continue 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.
- Consider further the overall work of VMCH including modern slavery within an ESG framework. Thereby recognising the interrelationship between modern slavery, environmental (including climate change) social and governance activities.
- Work with other ACAN Members in similar industry and try and leverage our collective buying power to engage more suppliers onto Sedex.

7

Requirements under the Modern Slavery Act 2018 (Cth)

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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