



# Modern Slavery Statement

1 JANUARY – 31 DECEMBER 2025

## Disclosure Note

This Modern Slavery Statement (**Statement**) is a joint statement made on behalf of The Catholic Archdiocese of Melbourne (**the Archdiocese**) and the entities it owns or controls or to which it is related (the **Reporting Entities**) in accordance with the requirements of Modern Slavery Act 2018 (Cth) (**The Act**). These entities operate within the broader governance framework of the Archdiocese and are subject to common stewardship oversight through the Archbishop of Melbourne. The Reporting Entities covered by this Statement include:

- The Catholic Archdiocese of Melbourne (**ABN 64 047 619 369**)
- Archdiocese of Melbourne Catholic Development Fund (**ABN 15 274 943 760**)
- Melbourne Archdiocese Catholic Schools Ltd (MACS) (**ABN 18 643 442 371**) and its controlled subsidiaries (Melbourne Archdiocese Catholic Specialist Schools Ltd and Melbourne Archdiocese Catholic Early Years Education Ltd)

For the purposes of this Statement, MACS and its subsidiary Melbourne Archdiocese Catholic Specialist Schools Ltd (MACSS) (**ABN 75 653 741 836**) are reported as a single entity reflecting their common governance arrangements and shared enterprise data systems. In contrast, Melbourne Archdiocese Catholic Schools Early Years Education Ltd (MACSEYE) (**ABN 37 653 741 612**), while also a subsidiary of MACS, is governed by its own Board and maintains separate data systems; accordingly, MACSEYE is reported separately to reflect its distinct governance and operational environment.

This statement was approved and signed by Most Rev Peter A Comensoli, Archbishop of Melbourne on 26 June 2026, as a responsible member of the Archdiocese and its Reporting Entities as defined by the Act.

The Catholic Archdiocese of Melbourne, 486 Albert Street, East Melbourne, VIC 3002 (**ABN 64 047 619 369**) <https://melbournecatholic.org/>



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Statement from

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## Most Rev Peter A Comensoli, Archbishop of Melbourne



In every age, the call to uphold the dignity of the human person remains at the heart of the Church's mission. Today, that call takes on renewed urgency as we confront the persistent and often hidden reality of modern slavery—an injustice that continues to wound individuals, families and communities across the world, and within our own society.

While modern slavery can seem distant or unseen, recent developments have reminded us that its risks are neither abstract nor remote. They can be present within industries and supply chains that intersect with our daily lives and ministries. This awareness challenges us not only to respond, but to examine more deeply how our choices, partnerships and practices may either contribute to, or help dismantle, systems of exploitation.

As a Catholic community, we are grounded in the conviction that every person is created in the image and likeness of God. Any form of exploitation stands in direct contradiction to this truth. For this reason, our commitment to addressing modern slavery must extend beyond compliance with legislative requirements; it must be an expression of our moral responsibility and our faith in action.

Over the past year, the Catholic Archdiocese of Melbourne has continued to strengthen its approach by embedding modern slavery considerations within a broader culture of stewardship, accountability and risk awareness. This includes more rigorous due diligence, deeper engagement with suppliers and partners, and the integration of modern slavery risks into our wider governance and decision-making frameworks. Such efforts reflect a growing recognition that vigilance, transparency, and informed action are essential in addressing the complexities of this issue.

This Statement, together with the practical measures it outlines, forms part of our ongoing journey from intention to action. It reflects a shift from policy alone to lived practice—where the protection of human dignity informs not only what we say, but what we do.

We remain committed to working collaboratively across the Church in Australia through the Australian Catholic Anti-Slavery Network (**ACAN**), recognising that this challenge requires shared resolve, collective wisdom and sustained effort. Together, we seek not only to reduce risk, but to contribute to a broader culture in which exploitation is not tolerated or concealed.

I express my sincere gratitude to all who have contributed their expertise, diligence and leadership to this work, and to the many staff across the Archdiocese whose daily efforts give concrete expression to our commitment.

As Archbishop, I approve and endorse this Modern Slavery Statement for the Catholic Archdiocese of Melbourne in accordance with the Modern Slavery Act 2018 (Cth) (**the Act**) on 26 June 2026 and affirm our continued participation in the ACAN Program 2023–2026.

May St Josephine Bakhita, who endured the suffering of slavery and became a witness to hope and freedom, intercede for all those who are exploited, and strengthen our resolve to act with justice, courage and compassion.

Yours sincerely in Christ Jesus,

**Most Rev Peter A Comensoli**  
ARCHBISHOP OF MELBOURNE

## About us

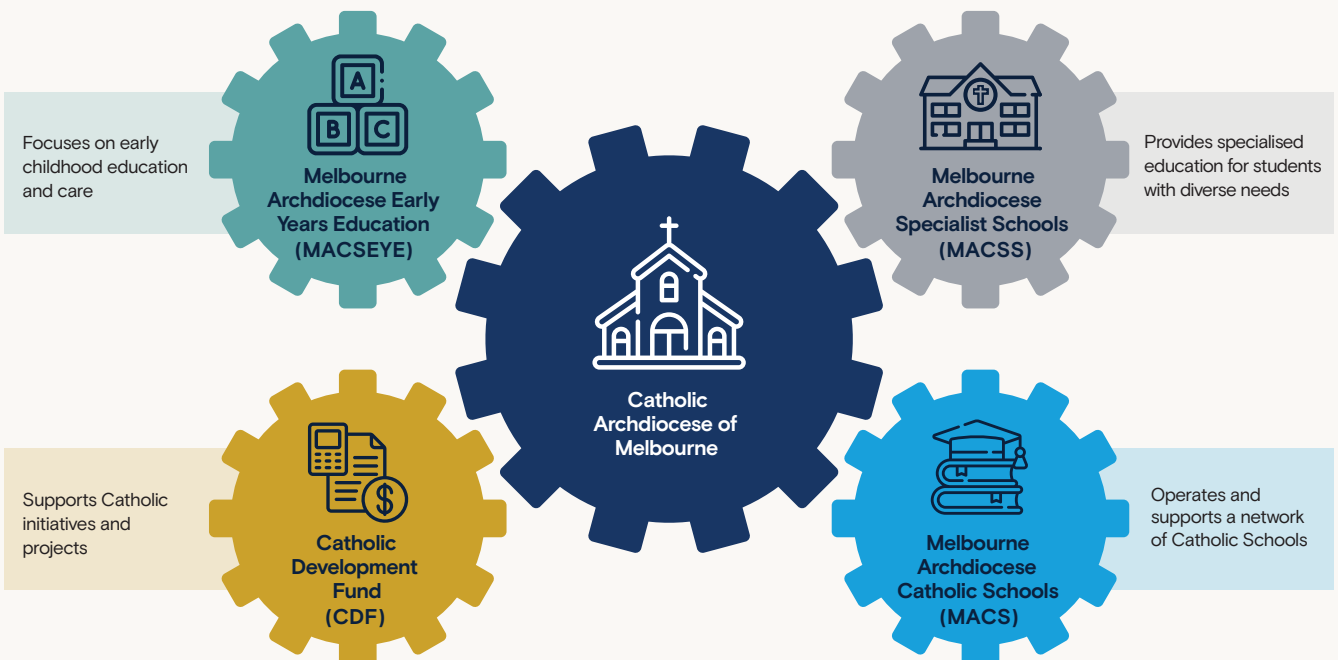
The Catholic Archdiocese of Melbourne (the Archdiocese), together with the Reporting Entities, exists to advance the mission of the Catholic Church in Melbourne. The Archbishop of Melbourne, as the responsible leader and steward of the Archdiocese, oversees a number of entities to support the effective delivery of this mission across diverse areas of activity. These entities operate as ministries or agencies of the Archdiocese, each with a defined purpose aligned to a particular mission priority, while remaining connected through a shared commitment to Catholic values, governance, and accountability.

While this Statement is presented jointly by the Archdiocese and its Reporting Entities, we recognise that each entity operates within distinct contexts, with differing operational structures, workforce profiles, procurement activities and service delivery models that give rise to unique modern slavery risks and risk exposures. The nature, scale and complexity of each entity's operations necessarily influences the types of industries engaged, the volume and diversity of suppliers, and the inherent risks present within their supply chains and operations. This Statement therefore seeks to reflect both our shared commitment to upholding human dignity and the distinct operational realities and risk environments of each Reporting Entity.

This statement does not cover Villa Maria Catholic Homes (VMCH). VMCH have produced a separate Modern Slavery Statement for 2025.

All the Reporting Entities are registered as charities with the Australian Charities and Not-for Profits Commission. Annual information statements, financial reports and other information for those entities can be found at [www.acnc.gov.au](http://www.acnc.gov.au).

### Together in Mission: The Archdiocese and its Reporting Entities



# Our footprint



 **194** Parishes

 **290** Catholic schools

 **39** Congregational / PJP Catholic schools

 **4** Kindergartens

 **88** Outside School Hours Care services

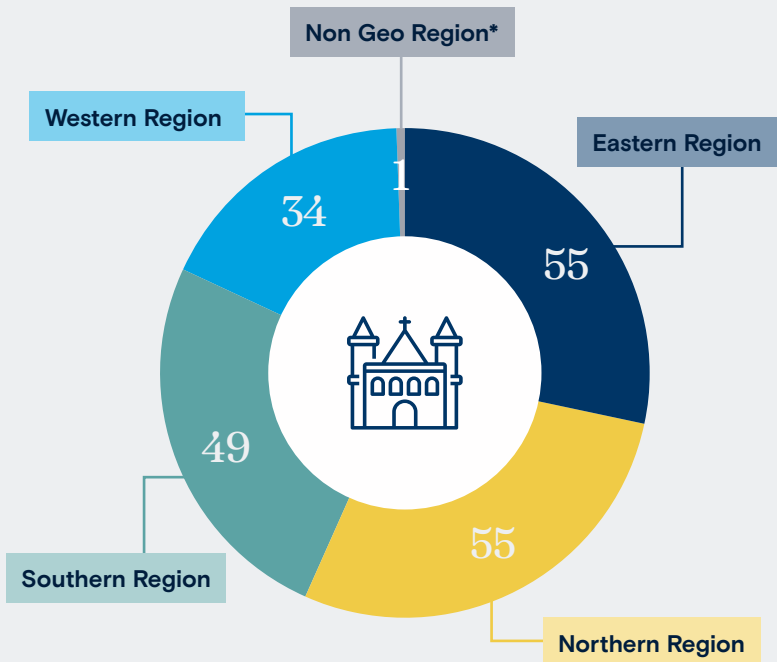
 **22** Development Funds across Australia and New Zealand (CDF)

## Organisational structure and geographical regions

The Archdiocese is the largest Catholic archdiocese in Australia by population. It covers Greater Melbourne and extends across surrounding regions of Victoria, encompassing metropolitan Melbourne, key growth corridors in the north, west and south-east, as well as regional areas including Mansfield, Castlemaine, Geelong, Healesville and the Mornington Peninsula. In practical terms, it spans from dense inner-city communities to outer suburban and semi-regional areas, reflecting a geographically expansive and socio-economically diverse footprint.

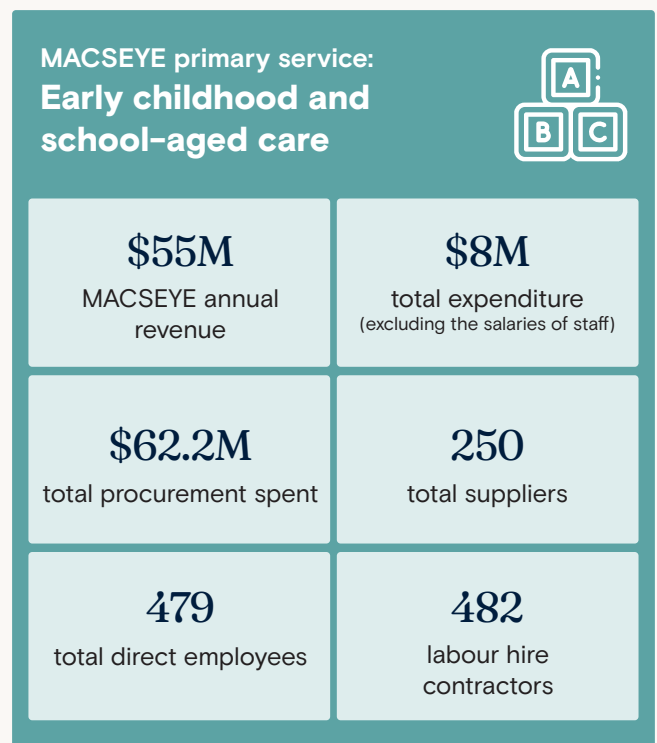
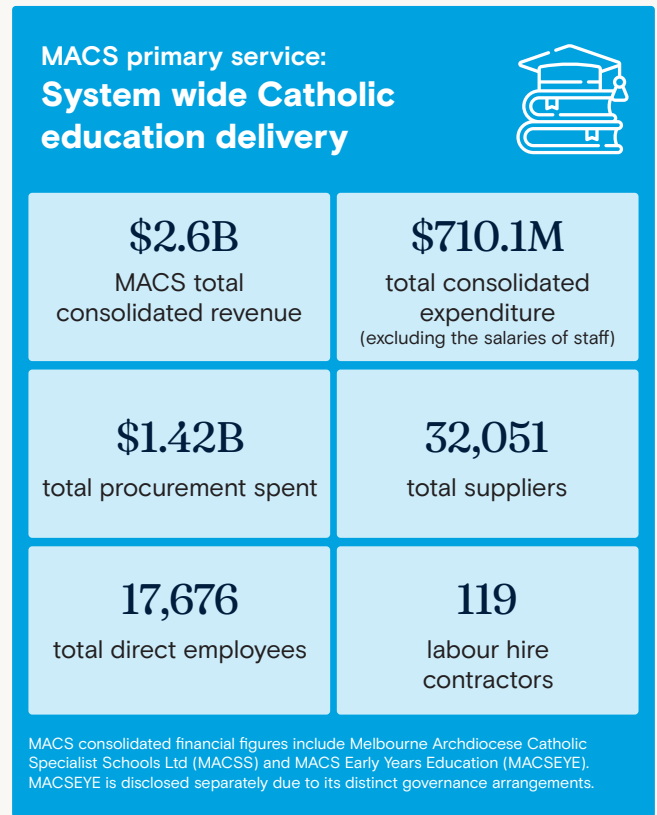
The organisational structure of the Archdiocese is displayed in Figure 1 of Appendix A – Organisational charts (Page 40). The Chancery Office of the Archdiocese is located in East Melbourne.

## Distribution of Catholic Parishes by Region



\*This represents a parish that was established to serve a particular community or pastoral purpose rather than a defined geographic area. Accordingly, it does not fall within the Archdiocese's standard four-region geographical structure.

# Profile, operations and workforce



## The Catholic Archdiocese of Melbourne

The Archdiocese serves a diverse and vibrant community of approximately one million Catholics across Melbourne, with 194 parish communities at the heart of its life and mission. United by our shared faith and our love of God and neighbour, our community is a rich tapestry of people of all ages, cultures and backgrounds, seeking to live the way of Jesus Christ in our homes, workplaces and within the wider community.

Presided over by the Archbishop of Melbourne, the life and mission of the Archdiocese are carried out through the worship, witness and charitable works of the Church. This mission is lived most deeply in our parish communities, where faith is nurtured in families, strengthened through communion, and expressed in service to others.

At the heart of the Archdiocese's mission is a preferential concern for those who are most vulnerable – the poor, the marginalised, those living with disability, and those who have experienced harm or exploitation. This concern is not abstract, but is made visible through the charitable, pastoral and educational works of the Archdiocese. Sustained by the love of God, we are called to care for one another and to extend that care to the wider community, making Christ known and present through parishes, ministries and works of the Church.

Supporting this mission, the Archdiocese, through its Chancery, provides a range of advisory and support services to parishes to enable their effective operation and stewardship. These services include, but are not limited to, building and maintenance, financial reporting and governance, human resources, safeguarding, and information technology infrastructure, ensuring that parish communities are well supported in carrying out their pastoral and mission-focused responsibilities.

This mission is supported and extended through a range of related entities and ministries, reflecting the breadth of the Archdiocese's engagement with the community.

### Mission and strategy

“

*As the Catholic Church in Melbourne, we seek to live the Gospel of Jesus Christ and plant the seeds of faith entrusted to us within our local communities. These communities include our parishes, schools, hospitals, social service agencies, and the many groups, movements and ministries that together form the life of our local Church. In response to Pope Francis' call for a missionary Church, the Archdiocese of Melbourne is committed to an ongoing and intentional pathway of renewal through Take the Way of the Gospel – an invitation for all our people and communities to live the Gospel of Jesus Christ as the heart of our life, worship and outreach.*



– Archbishop Comensoli

### Governance framework

The Catholic Archdiocese of Melbourne (Chancery) operates as an unincorporated association and is a registered charity, governed by a dual framework of civil and canon law. Under the stewardship and authority of Archbishop Peter A Comensoli, the Archdiocese is supported by a range of governance and advisory structures that guide its strategic, pastoral, and temporal responsibilities. These include the Curia, the Diocesan Finance Council, the Council of Priests, the College of Consultors, and the Trustees of the Roman Catholic Trusts Corporation for the Diocese of Melbourne (RCTC). Together, these bodies ensure that the Archdiocese functions in accordance with its mission, ecclesial obligations, and regulatory responsibilities.

## Melbourne Archdiocese Catholic Schools (MACS)

Established by Archbishop Peter A Comensoli, Melbourne Archdiocese Catholic Schools (**MACS**) operates as a company limited by guarantee and is responsible for the governance and operation of parish primary schools and regional and archdiocesan secondary colleges in the Archdiocese of Melbourne, advancing the Church's mission in education.

MACS is the parent entity of Melbourne Archdiocese Catholic Schools Early Years Education Ltd (**MACSEYE**) and Melbourne Archdiocese Catholic Specialist Schools Ltd (**MACSS**), its wholly owned subsidiaries, established to support specific areas of Catholic education. MACSEYE focuses on the governance and operation of early childhood education and care services, while MACSS operates specialist Catholic schools.

Its governance and operation of approximately 290 Catholic primary and secondary schools commenced on 1 January 2021. MACS also provides a range of services to support the 39 congregational and ministerial public juridical person (PJP) schools that are not governed by MACS.



**Educating more than  
117,908 students**



**throughout  
290 schools**

### Mission and strategy

Catholic schooling seeks to provide the young with the best kind of education possible, one that fosters a formation of the whole person that is deeply and enduringly humanising (Francis 2019, n. 223).

“Education is integral to the mission of the Church to proclaim the Good News. First and foremost, every Catholic educational institution is a place to encounter the living God who in Jesus Christ reveals his transforming love and truth.”  
(Benedict XVI 2008).

This relationship elicits a desire to grow in the knowledge and understanding of Christ and His teaching.

With parents and parishes, Catholic schooling seeks to fulfil this mission by providing an environment in which students are enabled to:

- Encounter God in Christ and deepen their relationship with Him;
- Pursue wisdom and truth encouraged by a supportive academic culture; and
- Grow in the practice of virtue, responsible freedom and serving the common good.

In August 2022, MACS released its inaugural Strategic Plan 2030: Forming Lives to Enrich the World. At the heart of the strategy is MACS' purpose: 'Forming lives of faith, hope and love in the light of Jesus Christ' and vision: 'Every student is inspired and enabled to flourish and enrich the world'.

The strategy has four pillars through which its programs and initiatives are organised, that are: inspired by faith, flourishing learners, enables leaders and enriched communities.

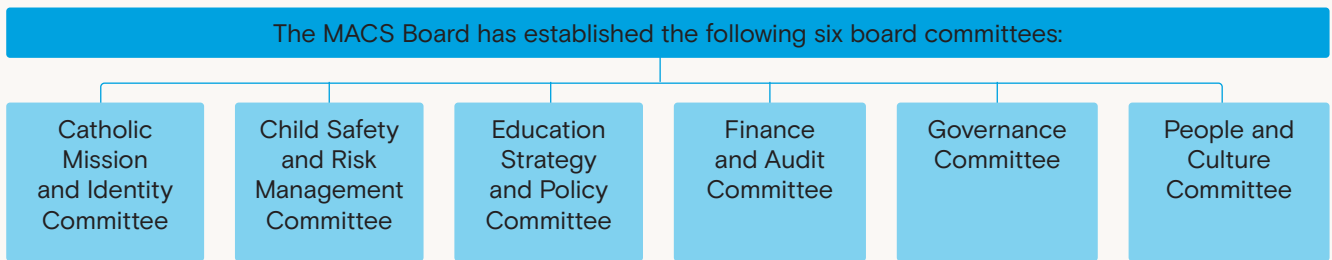
Since its release, MACS has launched several key programs and initiatives to support the delivery of the Strategic Plan to facilitate delivery of the key principles underlying the plan.

## Governance framework

MACS operates within a robust governance framework that supports accountability, transparency, and stewardship of Catholic education across the Archdiocese of Melbourne. The MACS Board is responsible for ensuring the organisation meets all fiduciary and strategic requirements and that operations are aligned with its mission and purpose in fulfilment of ecclesial, legal and statutory obligations. The Board is ultimately accountable to its sole Member, the Archbishop of Melbourne.

The Board holds the Executive Director and Executive Leadership Team accountable for the management and delivery of its objectives and implementation of policies.

To support the effective discharge of its responsibilities, the Board is assisted by six committees, each with defined roles and delegated authority. Each Committee operates under a Board-approved Charter and provides advice and recommendations to the Board, which retains ultimate decision-making authority.



This governance structure ensures that MACS operates with strong oversight and in a manner consistent with both its canonical context and its civil regulatory obligations. Modern slavery risks, incidents and emerging issues are reported through MACS' enterprise risk management framework and escalated, where appropriate, to the Board via its Child Safety and Risk Management Committee to support oversight, monitoring and continuous improvement of mitigation and remediation strategies.

The care, safety and wellbeing of children and young people is a central and a fundamental responsibility of MACS. As such, MACS does not tolerate improper conduct by employees or volunteers, and is committed to strengthened practice for the protection of children in line with Victorian Government child safety requirements.

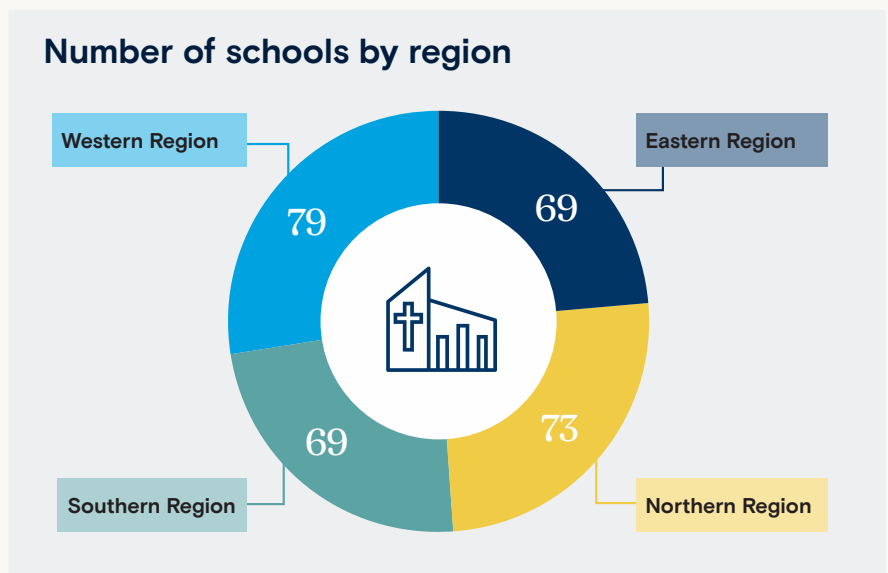
MACS has multiple codes of conduct and follows industry requirements relevant to schools under the Victorian Regulation and Qualification Authority (VRQA).

MACS employees and volunteers act in accordance with a range of codes, policies and procedures which support the governance and operation of MACS schools to deliver high-quality education and a nurturing school environment for all students. These include the Child Safety and Wellbeing Policy, Child Safety Code of Conduct, Recruitment Policy, Reportable Conduct Policy, Whistleblower Policy, Responsible Persons Policy, Code of Conduct for School Advisory Councils, Engaging Works through Labour Hire Providers Policy, Duty of Care Policy for MACS schools, Complaints Handling Procedures for MACS Schools and PROTECT – Reporting Obligations Policy.

## Organisational structure and geographical regions

MACS Head Office is based in East Melbourne. It is supported by four regional offices in the north (West Melbourne), south (Moorabbin), east (Croydon) and west (Werribee) of Melbourne.

The organisational structure of Melbourne Archdiocese Catholic Schools is displayed in Figure 2 of Appendix A – Organisational charts (Page 41).



## Melbourne Archdiocese Early Years Education (MACSEYE)

Melbourne Archdiocese Early Years Education Ltd (**MACSEYE**) is a wholly owned subsidiary of MACS and is governed by its own board, established to provide the governance and operational oversight of early childhood education and care services. MACSEYE was founded in 2023 and commenced operations in October 2024.

MACSEYE provides a growing range of early childhood education and school-aged care programs. The services are designed to foster curiosity, wellbeing, identity, and belonging, while supporting families and strengthening school communities.

### Mission and strategy

MACSEYE's strategy is to deliver on the vision that every child is supported to flourish and uncover their potential through provision of early years education and care programs focused on the development of the "whole" child, and fostering a strong sense of identity, health, and wellbeing. The initial phase of this strategy is to ensure service excellence, deliver sustainable growth, and strengthen the MACSEYE enterprise. MACSEYE partners with schools, parishes, and the broader community to support this shared commitment in giving every child the strongest possible start.

### Governance framework

MACSEYE is governed by a separate board and operates independently of MACS' internal board committees. The MACSEYE Board is responsible for the strategic and operational oversight of early years education and care services and for ensuring compliance with relevant laws and regulations, including the Modern Slavery Act 2018 (Cth).

The distinct governance structure of MACSEYE means that it forms part of the MACS Group for the purposes of modern slavery reporting under the Modern Slavery Act 2018 (Cth), however the responsibility for risk management and ethical procurement rests with the entity.

As MACSEYE commenced service delivery in the final quarter of 2024, the early operations have focused on establishing the foundational governance, risk and compliance structures necessary to support ethical operations and ensure compliance with legislative and social responsibilities. The organisational risk, including modern slavery risk, is identified and recorded on the Enterprise Risk Register, presented to an advisory Committee, and subsequently approved by the Board on a bi-annual basis.

In alignment with MACS' overarching commitment to ethical procurement and human rights due diligence, MACSEYE will continue to progressively embed and enhance modern slavery risk controls as operational activities continue to grow.

### Organisational structure and geographical regions

The MACSEYE Head Office is located at the Catholic Leadership Centre in East Melbourne.

As of 31st December 2025, MACSEYE operates 92 services across the Archdiocese of Melbourne including four kindergartens and 88 Outside School Hours Care (OSHC) services.

The organisational structure of Melbourne Archdiocese Early Years Education Ltd (MACSEYE) is displayed in Figure 3 of Appendix A – Organisational charts (Page 42).

### MACSEYE Services Breakdown

	Eastern Region	Northern Region	Southern Region	Western Region
Kindergarten	1	3	0	0
OSHC	28	27	17	16

## Catholic Development Fund (CDF)

Catholic Development Fund (CDF) was established in 1956 to provide financial services to Catholic organisations across the Archdiocese of Melbourne, including Catholic schools, parishes, healthcare, aged care and social service providers.

CDF advances the mission of the Church through values-based financial services, encompassing lending to Catholic organisations and the management of investments that sustain and grow its social mission across the Catholic community.

Since 1956, CDF has delivered a unique level of financial support to Catholic communities, grounded in Catholic Social Teaching and a commitment to the common good. As the financial needs of Catholic organisations have grown and become increasingly complex, CDF continues to provide lending solutions that may not otherwise be accessible through the traditional banking sector.

Today, CDF operates primarily within the Archdiocese of Melbourne, Diocese of Ballarat, Diocese of Bunbury and Diocese of Sale.

### Mission and strategy

CDF exists to meet the financial needs of Catholic organisations, supporting them in building Christ-centred communities that fulfil the Gospel and serve humanity by promoting justice, peace and the dignity of all people. CDF fulfils this mission by pooling the savings of the Catholic community to finance essential infrastructure, including schools, parishes, hospitals, aged care and social service facilities.

CDF's strategy is built around key pillars: trust and governance; systems and services; people and collaboration; and lending and growth. Together, these pillars advance CDF's mission and ensure the long-term sustainability of the Fund and the organisations it serves.

Through disciplined lending, prudent capital and liquidity management, and collaboration within the national Development Fund movement, CDF seeks to deliver long term, mission aligned impact while maintaining a strong licence to operate and protecting the interests of investors, stakeholders and the broader Church community.

To this end, CDF's lending is based on a unique set of criteria when compared to other financial organisations:

- CDF is guided by Catholic Social Teaching that provides a set of principles for building a society based on love, respect and human dignity
- CDF is committed to the common good, and as a Development Fund rather than a bank, has the ability to support its customers responsibly, who may otherwise not be eligible for support from other financial services institutions. In over 60 years of work devoted to the common good and the mission of the Catholic Church, CDF has never registered a bad debt
- Funding from within means Catholic endeavour and enterprises can be relatively self-sufficient, rather than relying on a banking system that may not be able to cater to their unique needs.

## Governance framework

Overall responsibility for CDF's governance, strategic direction, and performance rests with the CDF Advisory Board, which exercises oversight on behalf of the Archbishop of Melbourne as Trustee. The Advisory Board sets organisation-wide governance expectations, approves key strategies, policies and frameworks, and monitors financial performance, risk, compliance, and organisational culture.

The CDF Community Fund Advisory Board and the Board of Catholic Development Fund Community Fund Australian Financial Services Licence Limited (CDFCF AFSL Limited) operate as affiliate boards within the CDF Group governance structure, accountable to the CDF Advisory Board within their respective remits. Each affiliate board discharges its statutory, fiduciary, and regulatory obligations in accordance with its charter and applicable legislation, while operating in alignment with CDF's strategy, policies, and risk settings.

The CDF Advisory Board has established standing committees, including the Audit and Risk Management Committee, Finance Committee, and People and Culture Committee; each operating under approved charters to provide independent, non-executive oversight of financial reporting, risk management, compliance, capital and liquidity management, people strategy, and organisational culture.

Governance alignment across CDF is reinforced through overlapping board membership, consistent reporting protocols, shared committee structures, and the flow of minutes and key decisions between boards. The framework is further supported by clear delegations of authority, formally approved policies, and a robust risk management and compliance framework aligned with prudential, regulatory, and canonical expectations.

CDF is committed to high standards of governance, ethical conduct, and transparency, recognising that strong governance is foundational to maintaining trust with investors, stakeholders, and the broader Catholic community. The governance framework is reviewed regularly to ensure it remains effective, proportionate, and aligned with CDF's strategy, risk profile, and mission.

## Organisational structure and geographical regions

CDF's Head Office is based in East Melbourne (VIC), supported by regional offices in Ballarat (VIC), Sale (VIC) and Bunbury (WA), with geographical staffing in these areas.

CDF Head Office also provides a range of services to 22 Development Funds, across Australia and New Zealand, each funding Catholic infrastructure in support of the Church's mission and their local Diocesan communities.

The organisational structure of CDF is displayed in Figure 4 of Appendix A – Organisational charts (Page 42).

## CDF Advisory Board and standing committees



# Modern slavery risks in operations and supply chains

For Catholic entities, modern slavery risks are defined by the ACAN Category Risk Taxonomy, a classification standard that identifies severity of actual or potential harm to people (saliency) in spend categories.

The ACAN Category Risk Taxonomy is based on sources such as:

- The Global Slavery Index;
- The International Labor Organisation (ILO), including definitions of modern slavery;
- The Bureau of International Labor Affairs (ILAB), U.S. Department of Labor; and
- The Global Child Forum and UNICEF.

Four key factors are also used to determine the level of risk:

- **Geography:** the country or location where a good is made or service is delivered;
- **Industry:** the sector in which the making of goods or delivery of service occurred;
- **Commodity:** the raw materials or components that comprise the foods or products; and
- **Workforce vulnerability:** such as bonded visas, temporary migrants, women or children known to be employed in specific industry sectors.

Other considerations include trends, cases, and risk intelligence identified through the Domus 8.7 remediation service, including grievances and remediation insights relevant to category and risk to workers. Domus 8.7 offers confidential advice, assessment and remediation support for people impacted by modern slavery, as well as for organisations that may cause, contribute to, or be directly linked to such impacts through their operations or supply chains.

# Supply chain risk

## The Archdiocese

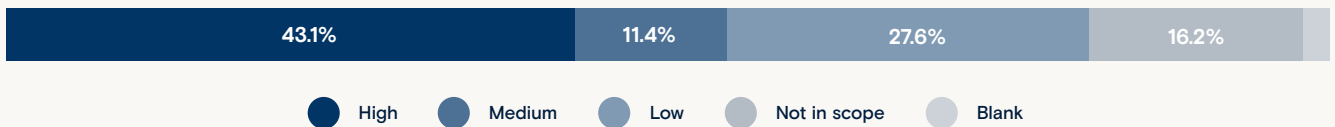
The Archdiocese's ability to classify and assess procurement data has improved over time, supporting more informed risk identification. In 2023, 72% of the Archdiocesan total spend in procurement was categorised as high risk, indicating a significant exposure to sectors commonly associated with elevated modern slavery risks. By 2024, this exposure reduced to 47%, with a corresponding increase in low-risk (30%) and the introduction of "not in scope" (10%) and "unclassified" (2%) categories.

There have also been developments that reflect a maturing approach to risk assessment and data governance within procurement practices, with the 2025 data demonstrate continued progress. High-risk spend has further reduced to 43.1%, while low risk spend has remained relatively stable at 27.6%. The proportion of spend classified as "not in scope" has increased to 16.2%, indicating enhanced application of the ACAN taxonomy and improved delineation of relevant and non-relevant procurement categories.

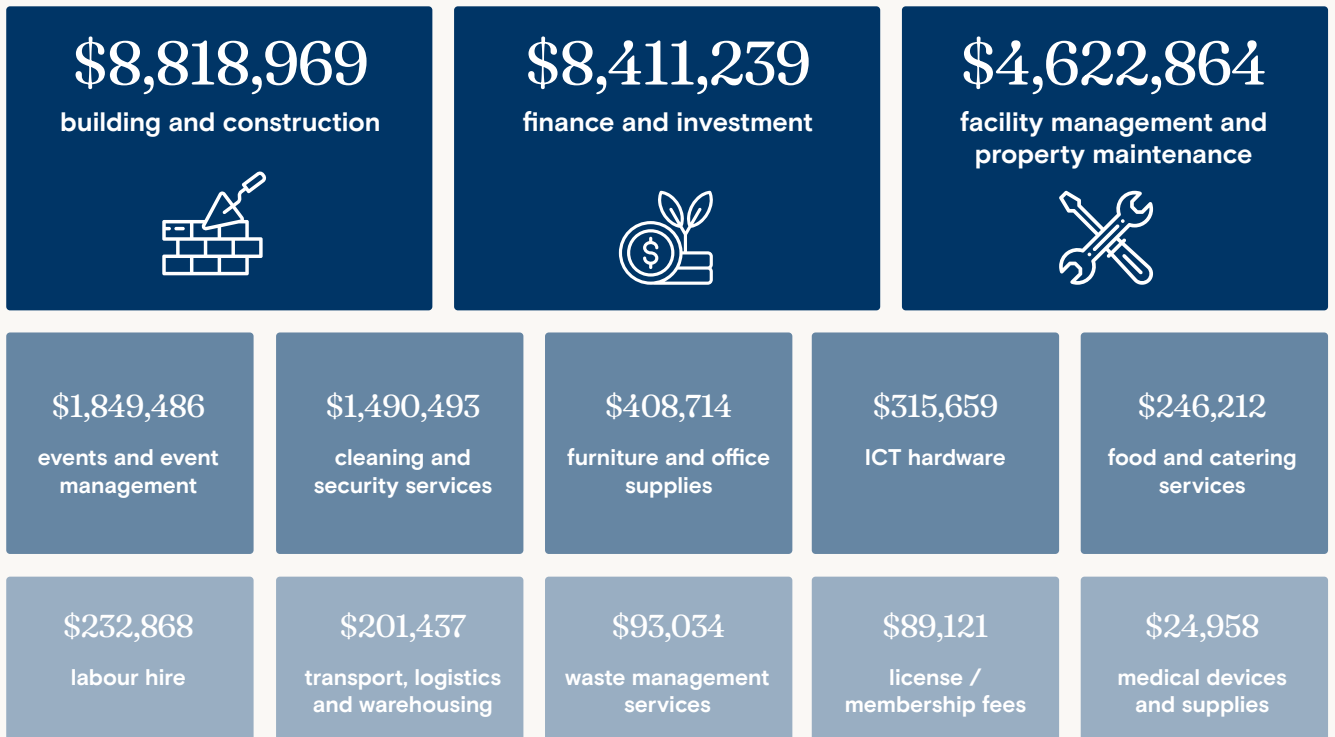
An analysis of the Archdiocese's 2025 spend on goods and services in these categories is represented in the charts below.

### The Archdiocese spend in high-risk categories

#### Spend profile by risk taxonomy category



#### The Archdiocese spend in high-risk procurement categories



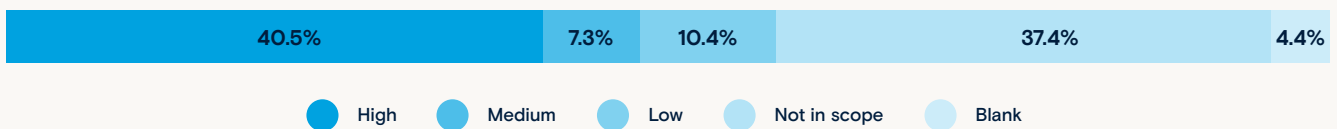
## MACS

MACS' operational risk profile reflects the scale and complexity of one of the largest Catholic education providers in the world, with significant procurement activity and supplier engagement across a number of sectors commonly recognised as presenting elevated modern slavery and labour exploitation risks.

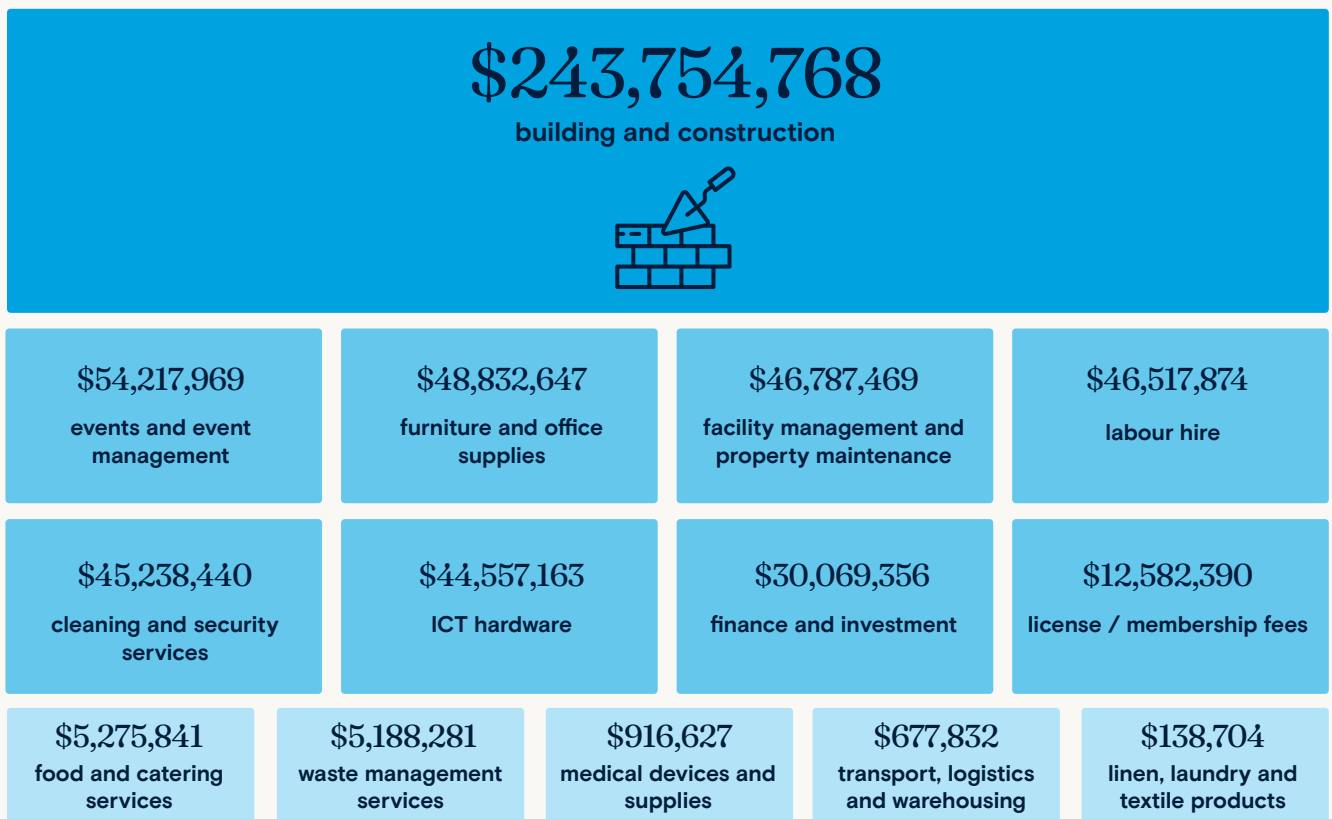
In 2025, MACS' highest-risk procurement categories by spend included building and construction (\$243.8M), events and event management (\$54.2M), furniture and office supplies (\$48.8M), facilities management and property maintenance (\$46.8M), and labour hire (\$46.5M). These sectors often involve complex supply chains, subcontracting arrangements, outsourced labour models and manufacturing environments that may increase exposure to risks such as worker exploitation, underpayment and unethical labour practices. These risks are further influenced by the scale of MACS' supplier base, including 5,979 suppliers in furniture and office supplies, 3,697 in facilities management and property maintenance, 2,692 in events and event management, and 558 in building and construction. The combination of significant expenditure and high supplier volumes creates inherent challenges in maintaining visibility and oversight across supply chains, particularly beyond Tier 1 suppliers. MACS therefore continues to prioritise supplier due diligence, procurement governance and risk-based monitoring, and will work collaboratively with suppliers and ACAN to progressively develop risk profiles for major suppliers operating within identified high-risk procurement categories.

### MACS spend in risk categories

#### 2025 spend profile by risk taxonomy category



#### MACS spend in high risk procurement categories



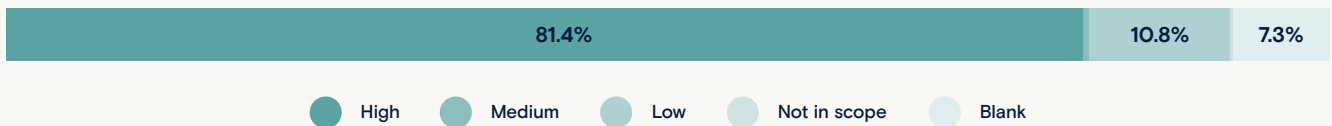
## MACSEYE

An analysis of MACSEYE's 2025 expenditure shows that 81% was categorised as high-risk based on ACAN taxonomy primarily due to its focus on the construction of nine children's hubs as part of its partnership with the Victorian Schools Building Authority. The construction of the nine hubs resulted in 75% or \$46.5m of 2025 third party supplier expenditure in the high-risk Building and Construction category. Beyond building and construction, the other high risk categories included labour hire (\$1.6M), furniture and office supplies (\$1.2M), food and catering services (\$410K), and facility management and property maintenance (\$267K). To mitigate supply chain risk in this category of spend, MACSEYE adopted MACS' supplier selection and tender processes in selecting builders for these projects. In addition, ACAN supplier surveys have been completed by four of the five construction companies. Moving forward, completed ACAN supplier surveys will become a precondition for construction companies.

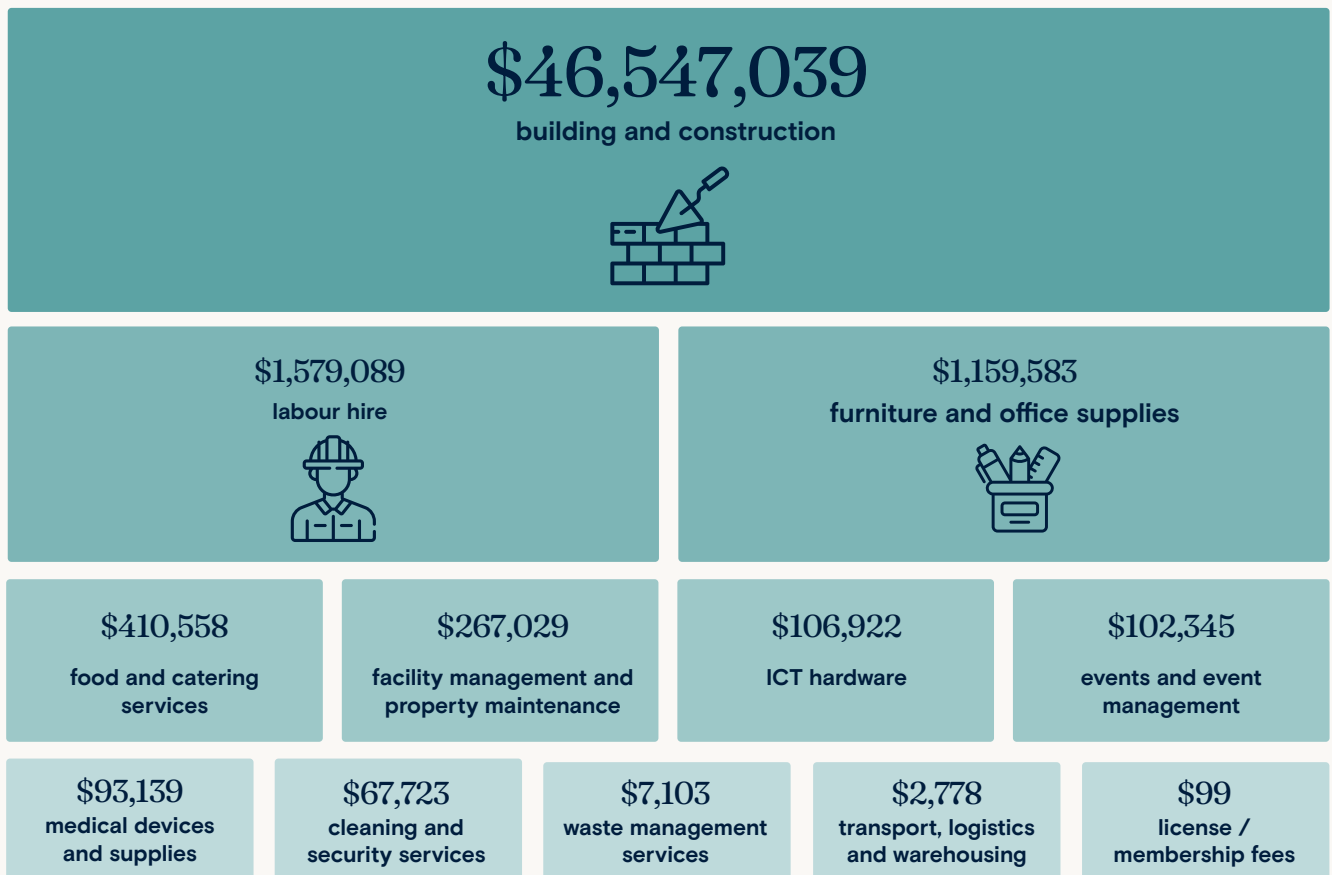
In collaboration with ACAN and MACS, MACSEYE aims to engage with suppliers to develop a risk profile specific to each major supplier across all operational activities.

### MACSEYE spend in risk categories

#### 2025 spend profile by risk taxonomy category



#### MACSEYE spend in high risk procurement categories



## CDF

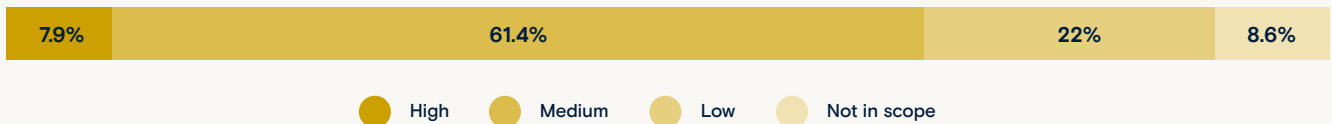
In the ordinary course of business, CDF enters into outsourcing arrangements where specialist expertise, services, facilities or the like are required, and manages these arrangements in accordance with its approved Outsourcing Policy and Risk Management Framework.

While CDF's supplier base and operational footprint are comparatively smaller in scale, CDF recognises the importance of maintaining appropriate oversight across higher-risk procurement activities. CDF therefore continues to strengthen its modern slavery response through ongoing enhancements to governance, supplier due diligence, procurement practices, staff awareness and collaboration with suppliers and ACAN to better identify and manage modern slavery risks across its operations and supply chains.

The following analysis of CDF supply chains is based on the ACAN risk taxonomy across 41 categories of geographic location, industry or sector, commodity, product category and workforce profile.

### CDF spend in risk categories

#### 2025 spend profile by risk taxonomy category



### CDF spend in high-risk procurement categories

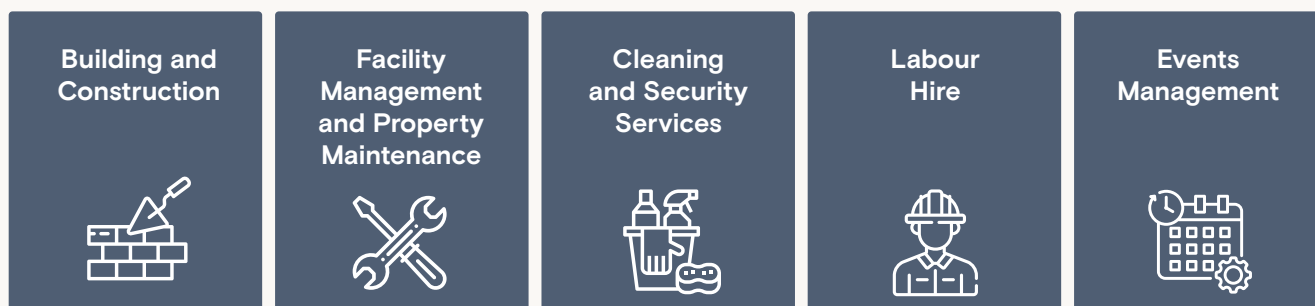


ACAN taxonomy categories by supplier numbers for the Archdiocese and its Reporting Entities



# Operational risk

Through the ACAN modern slavery risk management program (ACAN Program), the Archdiocese and its Reporting Entities continue to focus activities with suppliers of labour and the operational risk associated, in the following high-risk labour supply chain areas:



These sectors have been identified through a holistic consideration of available data and operational context, including procurement spend, the volume and diversity of suppliers engaged, and the inherent risk characteristics and structural complexities of each industry.

These industries share common risk features, including complex subcontracting arrangements, fragmented and multi-tiered supply chains, and a reliance on low-paid, temporary or otherwise vulnerable workforces. These factors can reduce visibility over labour practices and increase the risk of exploitation if not actively managed.

Building and construction represents the highest financial exposure across the Archdiocese and its Reporting Entities, whilst facility management and property maintenance present heightened operational complexity due to the scale and volume of suppliers and subcontractors engaged. Cleaning and security services and labour hire services remain priority categories given their well-documented association with elevated modern slavery risks and labor-intensive delivery models.

Events and event management have been identified as an emerging priority risk category in 2025 reflecting both the significant expenditure and high supplier volumes across the Reporting Entities, as well as the nature of contemporary event delivery models. The delivery of events typically relies on multi-layered subcontracting arrangements and a high proportion of temporary, casual or agency labour, often engaged under compressed timeframes. These characteristics can limit end-to-end visibility across supply chains and heighten exposure to risks such as underpayment, excessive working hours, or inadequate labour protections. As such, events and event management represent a convergence of several known modern slavery risk indicators.

In 2025, the Archdiocese engaged 24 suppliers in this category, with total expenditure of approximately \$1.4 million. A significant driver of this activity was the delivery of the Australian Catholic Youth Festival 2025, a large scale national event which involve complex coordination of multiple service providers across logistics, staging, technical production, security, cleaning and catering. In response, the Archdiocese is strengthening its focus on this category through enhanced due diligence, clearer expectations for suppliers, and more deliberate oversight of labour-intensive and subcontracted services associated with major events.

## MACS

A key component of MACS' operational profile and modern slavery risk management approach is its workforce composition and employment practices. As one of the largest Catholic education providers in the world, MACS maintains a substantial workforce across schools and corporate operations, requiring robust governance frameworks to support lawful, fair and ethical employment practices across direct employment, visa sponsorship and labour hire arrangements.

In 2025, 17,676 people were employed by MACS, of which a high proportion (96%) work at MACS schools. Of these employees, 81% are women and approximately 98% are Australian citizens or permanent residents. All employees are engaged in Australia and just over 372 staff hold temporary visas. MACS operates in accordance with a specific policy, the Employment and Sponsorship of Visa Holders and Overseas Workers Policy to ensure that when a visa holder is employed or where MACS seeks to sponsor an employee on a visa, that there is compliance with immigration and right-to-work requirements under Australian law.

Conditions of employment for all employees are established for most staff under a multi-enterprise bargaining agreement which provides a wide range of benefits and flexibility to staff. MACS frequently discusses conditions for employees with trade unions across all MACS schools and offices, who act on employees' behalf to represent their interests and in the development of the multi-enterprise agreement. A small proportion of employees are covered by modern awards or common law. On occasion, MACS engages staff through agency and other labour hire arrangements and follows requirements under the Labour Hire Licensing Scheme in Victoria and its policy on Engaging Workers Through Labour Hire Providers, to ensure labour hire agencies are compliant with these requirements.

As listed above and referenced on websites for individual MACS schools or the MACS website, there are a range of policies and codes which govern how MACS operates and these policies are enlivened by the core values of integrity, excellence and respect.

## MACSEYE

MACSEYE's highest expenditure in 2025 was primarily in the high-risk Building and Construction industry. However, the nature of expenditure will continue to evolve as MACSEYE transitions from a start-up with a heavy focus on construction to a mix of construction and operational service delivery. Expenditure on labour hire is anticipated to increase as it continues to grow its operational services. Accordingly, MACSEYE will broaden its risk mitigation focus moving forward to include labour hire.

## CDF

As part of its Risk Management Framework, CDF maintains a comprehensive suite of policies and frameworks to identify, assess, treat, and monitor operational risks. While CDF is not prudentially supervised by the Australian Prudential Regulation Authority (APRA), it has aligned its practices with APRA requirements and guidance to ensure best-practice risk and compliance management, enabling CDF to operate safely, responsibly, and in service of the Church's mission.

Outsourcing arrangements are assessed as material or non-material based on their potential impact on clients, operations, risk management, regulatory compliance, and CDF's reputation.

All outsourcing arrangements are subject to formal due diligence, risk assessment, and Board or delegated approval, and are governed by legally binding contracts. These contracts address service levels, responsibilities, business continuity and disaster recovery, information security, insurance coverage, and exit provisions. Ongoing oversight is maintained through performance monitoring, periodic contract review, and escalation of issues to management, committees, and the Board, ensuring outsourcing risks are actively managed and remain within CDF's risk appetite.

# Actions taken to assess and address risk

## Summary of 2025 activities

Throughout 2025, the Archdiocese and its Reporting Entities continued participation in the ACAN Program. Through this program, staff were supported with access to monthly webinars, e-newsletters, practical tools and templates, guidance materials, and structured supplier engagement initiatives.

### ACAN supplier engagement

**The ACAN Program provides supplier engagement support and data, enabling a systematic and comprehensive supply chain risk assessment. In 2025 the ACAN Program launched a new purpose-built data management platform – ROTA. ROTA centralises the ACAN Risk Management Program framework and facilitates supplier performance evaluation and engagement. The ACAN Program includes:**

1. Evaluation of the modern slavery risk within operations and supply chains, using the ACAN Risk Taxonomy;
2. ACAN Supplier Survey to identify supplier revenue, number of employees, countries of origin for goods sourced overseas, workforce contractual arrangements and Sedex membership status. Sedex is an external supply chain risk management and ethical sourcing platform used through the ACAN Program to engage suppliers, gather supplier information, and more;
3. Supplier education on modern slavery and risk management in key areas such as cleaning; building and construction; procurement of labour; labour hire and services; sourcing goods from overseas; grievance mechanisms and remediation;
4. Onboarding suppliers to Sedex;
5. Sedex Self-Assessment Questionnaire (SAQ), which helps suppliers to evaluate their practices against established standards and identify areas for improvement;
6. Desktop review to identify key actions required from suppliers;
7. Enhance supplier screening using Know Your Client (KYC) intelligence software;
8. Corporate Social Compliance Audits which provide a point in time, objective and independent verification process of supplier alignment with local laws and worker wellbeing standards;
9. Domus 8.7 Index modern slavery statement assessment on selected suppliers in high-risk categories; and
10. ACAN Prequalified Supplier Directory – a list of preferred suppliers accessible to Catholic organisations.

**During the reporting period, the Archdiocese and its Reporting Entities applied the ACAN framework to assess and address modern slavery risks within their respective operations. This included implementing a coordinated supplier engagement approach, which involved:**

- Identifying suppliers operating in high-risk procurement categories using the ACAN Procurement Taxonomy;
- Inviting these suppliers to complete the ACAN Supplier Survey, with a total of 2,152 surveys completed to date across all four entities, including 593 completed during the 2025 reporting period;
- Supporting suppliers to register with Sedex and complete the Self-Assessment Questionnaire (SAQ) with 187 suppliers onboarded to the Sedex platform; and
- Having ACAN Program Managers review SAQ responses to identify gaps in supplier management systems, including areas for further training, capacity building, and risk mitigation, noting a significant increase in the number of suppliers completing SAQs between 2024 and 2025.

The ACAN supplier engagement approach also enabled the identification of common suppliers across participating Catholic entities. This facilitated a more coordinated and efficient engagement process, strengthening collective leverage while reducing duplication of effort. As part of this program, suppliers engaged by the Archdiocese and its Reporting Entities were also invited to participate in the 2025 ACAN webinar series, which aimed to build foundational awareness and understanding of modern slavery risks and responsibilities.

**In addition to these activities, the Archdiocese also undertook a series of targeted activities to strengthen its approach to identifying and managing modern slavery risks within a broader enterprise risk management framework, including:**

- Development of a Risk Management Implementation Plan to support the structured rollout and embedding of organisational risk practices;
- Articulated a Risk Appetite Statement to guide risk-informed decision-making across the organisation;
- Established an initial enterprise-wide risk register through which modern slavery risks are now formally captured, assessed and monitored alongside other organisational risks;
- Strengthened supply chain risk oversight by engaging closely with Cushman & Wakefield, a newly appointed Facilities Manager, to assess and gain assurance over their modern slavery risk management frameworks and supplier controls across facilities management services;
- Embedded modern slavery considerations into standard contracting practices, with all new and renewed contracts incorporating consistent modern slavery clauses; and
- Delivered targeted training to operational areas engaged in medium- to high-risk procurement, building capability in identifying modern slavery risk indicators.

**The Archdiocese further enhanced the application of ACAN risk taxonomy by:**

- Strengthened data quality, consistency and reliability through refined data classification and validation processes;
- Embedded risk-informed procurement practices across high risk operational areas such as Property and Infrastructure and Finance; and
- Strengthened supplier due diligence and engagement within high- and medium-risk procurement categories.

Overall, these initiatives reflect a maturing and increasingly integrated approach to modern slavery risk management across operations and supply chains.

**In addition to these activities, MACS delivered its 2024 modern slavery action plan as it:**

- Added modern slavery management to the enterprise, Finance Directorate and schools risk registers;
- Increased awareness of the risks of modern slavery in our operations and supply chains by uploading the 2024 statement on the Intranet and Internet sites. Internal staff and the public now have access to the commitments being made to manage modern slavery risk; and
- Launched **MACSLearn**, the Learning Management System, and making available the ACAN e-learning module 'Modern Slavery 101 – Introduction to Modern Slavery'.

**MACSEYE commenced participation in the ACAN program and undertook the following:**

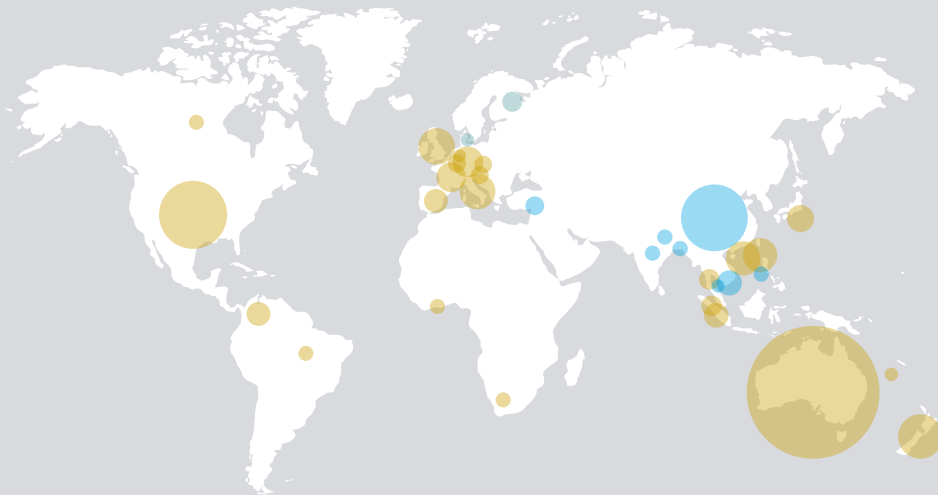
- Developed a baseline modern slavery risk assessment based on expenditure incurred during the 2025 calendar year which was its first full year of operation;
- Identified internal roles responsible for mitigation and/or oversight of modern slavery risks and plans to introduce ACAN eLearning into the role-based training requirements for these roles; and
- Commenced integrating modern slavery considerations into procurement and risk management activities.

**33,500** total unique suppliers

**14,857** suppliers in high risk procurement categories

### Sourcing Countries for tier 1 suppliers

Overall inherent risk ● High ● Medium ● Low



### Supplier screening - ACAN collated



**529**

enhanced 3rd party supplier screening



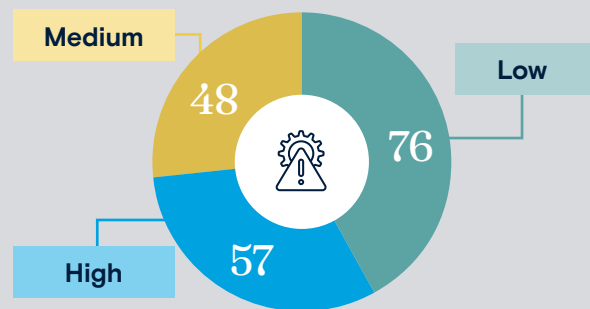
**25**

3rd party supplier screening - high and medium risk

**187**  
suppliers on Sedex

**135**  
SAQs completed

### Sedex SAQ Risk Category



**2,152**

ACAN supplier surveys completed

**593**

ACAN supplier surveys completed in 2025



**440** suppliers identified for Sedex onboarding

**18**  
audits in 2025

**135**  
audit findings in 2025



**1,321**  
supplier e-mail shared



**6,612**  
supplier communication



**36**  
suppliers completing e-learning

## Remediation and response

Entities engaged Domus 8.7, a key element of the ACAN Program, to provide specialist and independent remediation support services. Domus 8.7 offers confidential advice, assessment and remediation support for people impacted by modern slavery, as well as for organisations that may cause, contribute to, or be directly linked to such impacts through their operations or supply chains. Aligned with the reporting criteria under the Act and informed by Catholic Social Teaching, this approach supports a structured, ethical and compassionate response centred on the needs, wellbeing and empowerment of impacted persons, while also strengthening organisational visibility and informing continuous improvement in modern slavery risk management.

Domus 8.7 provides a range of specialist services aimed at strengthening prevention, identification and remediation responses to modern slavery. These include:

- Resources and grievance mechanisms that support organisations to listen safely and effectively to workers;
- A 24/7 careline staffed by professional counsellors for workers engaged across participating sites and supply chains;
- Specialist guidance and technical assistance to help organisations identify, assess and respond to modern slavery risks and indicators;
- A documented framework for assessing whether an organisation may have caused, contributed to, or be directly linked to modern slavery risks or impacts;
- Direct support and case coordination for people impacted by modern slavery, including needs assessments and remediation planning;
- Referrals and connections to community services, unions, legal and social support providers;
- Practical assistance where required, including transport, accommodation, financial and food support;
- Support with job training, retraining and redeployment opportunities;
- Advocacy and accompaniment to assist engagement with government and law enforcement agencies where appropriate; and
- Opportunities for people with lived expertise to contribute to and strengthen modern slavery response practices and organisational learning.

Domus 8.7 adopts a victim-centred and trauma-informed approach that empowers people impacted by modern slavery to have choice and control over the forms of remediation and support that are meaningful to them. The Domus 8.7 Advisory Committee includes a person with lived expertise, Mr Moe Turaga. Domus 8.7 is a registered charity with the Australian Charities and Not-for-profits Commission (ACNC) and an endorsed Public Benevolent Institution with Deductible Gift Recipient (DGR) status.



### Case study

The following case study demonstrates how access to Domus 8.7 supported a proactive and worker-centred response where potential labour exploitation concerns were identified within the supply chain. While no formal findings of modern slavery were established, the matter highlighted the importance of having independent remediation pathways and support mechanisms available for impacted workers.

In December 2025, MACS' security services supplier, MA Services Group, entered administration amid allegations of worker underpayments and tax evasion. As part of the transition process to the administrator's recommended supplier, Allied Security, six affected security personnel were offered access to independent remediation and support services through Domus 8.7. While none of the workers elected to access these services, the availability of confidential and independent support formed an important part of MACS' response.

The matter also reinforced the importance of ongoing supplier oversight within higher-risk labour-intensive sectors. Accordingly, the MACS Procurement Team will undertake a tender process for ongoing security services across its office sites during 2026.

# Action Plan 2026-2030

The 2026 Action Plan represents a continuation of the 2025 program of work across the Archdiocese and its Reporting Entities, reflecting a rolling and iterative approach to strengthening modern slavery risk management frameworks. It incorporates both initiatives carried forward from prior years, and additional actions identified through ongoing risk assessment and capability development. While framed for 2026, the Action Plan is intended to support a multi-year uplift program, with several initiatives expected to extend over the next three to four years and continue to evolve in future reporting periods.

The Archdiocese and its Reporting Entities will expand the use of Sedex in 2026 to strengthen modern slavery risk management, including assessing existing suppliers, screening new suppliers, validating risk levels, improving supply chain visibility, and monitoring supplier performance over time. In addition, ACAN e-learning modules will be embedded into internal Learning Management Systems to enhance staff capability, oversight, and accountability. These modules cover foundational awareness, business relevance, implementation of risk management programs, and grievance and remediation processes.

The following pages contain a detailed overview of action plans for the Archdiocese and its Reporting Entities.

## The Archdiocese

In addition to the specific actions carried forward from the 2025 Action Plan, the Archdiocese will, in 2026 and beyond, focus on the following priority areas: enhancing the quality, consistency and completeness of supplier data to support more effective risk identification, monitoring and decision-making; deepening supplier due diligence and accountability; expanding internal capability and awareness through broader training programs; developing worker voice and remediation pathways, and establishing strengthened governance and oversight mechanisms.

Action	Status
<b>Management systems</b>	
Continue to develop policies, principles and processes and integrate these into management tools	Ongoing
Work to integrate anti-slavery into governance structure and define metrics to measure, manage, enhance reporting capabilities and develop KPIs	Ongoing
<b>Risk management</b>	
Continue working with partners to update risk management framework and define how to measure and understand risk in operations and supply chains	Ongoing
Develop a process to periodically review and update the risk management framework, as understanding of modern slavery risk matures	In progress
Deepening supplier due diligence and accountability	Planned
Developing worker voice and remediation pathways	Planned
Establishing governance and oversight mechanisms, including a role responsible for overseeing progression of the Action Plan	Planned
<b>Procurement and supply chain</b>	
Inform suppliers of anti-slavery measures, including updated contract clauses, supplier code of conduct and tender requirements	Complete
Strengthening data integrity and supplier visibility by enhancing the quality, consistency and completeness of supplier data to support more effective risk identification, monitoring and decision-making	Planned
Undertake supplier engagement via ACAN e-learning and on-boarding to Sedex, monitor and report on Sedex SAQ results	Ongoing
Develop protocols for reviewing suppliers and for following up on adverse findings	In progress
Roll out updated contract clauses, supplier code of conduct and tender requirements	Complete
<b>Human resources and recruitment</b>	
Activate the ACAN e-learning modules and make available to staff, boards and senior management	Partially complete
Expanding internal capability and awareness by broadening training programs and embedding modern slavery risk awareness across key functions, particularly those involved in procurement, contract management, and third-party engagement	Planned

## MACS

Action	Status
<b>Management systems</b>	
Configure and embed modern slavery risk in MACSGuard (risk taxonomy, owners, review cadence) and publish a quarterly dashboard/reporting pack (top risks, supplier due diligence status, open actions)	<b>In progress</b>
Standardise a modern slavery control library and introduce a risk-based assurance/testing program (sampling and control checks), with actions tracked to closure in MACSGuard	<b>Planned</b>
Implement mandatory procurement “gates” so defined triggers (e.g., labour hire/cleaning/security/construction or spend thresholds) require a documented modern slavery risk assessment and sign-off before award	<b>Planned</b>
Establish supplier corrective action plans for priority/high-risk suppliers (e.g., Sedex SAQ gaps, subcontractor transparency), tracked and evidence-based in MACSGuard, with follow-up review cycles	<b>Planned</b>
Commission an independent effectiveness review of the modern slavery control framework (design + operating effectiveness) and refresh the next multi-year roadmap based on findings, tracked in MACSGuard	<b>Planned</b>
<b>Risk management</b>	
Establish and maintain a modern slavery risk register in MACSGuard (aligned to ACAN taxonomy), including defined risk owners, review cadence, escalation thresholds and quarterly reporting to governance	<b>In progress</b>
Implement a risk-based assessment and assurance cycle for priority/high-risk suppliers (due diligence, periodic reviews and action tracking) and record outcomes and remediation actions in MACSGuard	<b>Planned</b>
Embed mandatory modern slavery risk “gates” in procurement/contracting processes for defined triggers (e.g., labour hire, cleaning/security, construction and/or spend thresholds), with sign-off and evidence captured in MACSGuard	<b>Planned</b>
Introduce modern slavery KRIs/KPIs and trend reporting (e.g., % high-risk suppliers assessed, overdue actions, repeat findings, SAQ completion) to drive performance and accountability, reported through established governance forums	<b>Planned</b>
Undertake an internal or independent review of the effectiveness of modern slavery risk controls (design and operating effectiveness) and refresh the next 3–5 year uplift roadmap based on findings	<b>Planned</b>

<b>Procurement and supply chain</b>	
Finalise and implement enhanced RFX templates (RFQ/RFP/tender) and tender evaluation guidance to consistently capture and assess suppliers' modern slavery risk controls, subcontracting arrangements and evidence	<b>In progress</b>
Update the Procurement and Contract Management Policy and supporting procedures to embed risk-based modern slavery due diligence requirements (including triggers, minimum evidence, approvals and recordkeeping)	<b>Planned</b>
Implement a structured supplier due diligence cycle for priority/high-risk categories (ACAN/Sedex onboarding, SAQ review, follow-up questions) and establish a standard corrective action plan (CAP) approach for identified gaps	<b>Planned</b>
Embed modern slavery monitoring into contract management for priority suppliers (scheduled reviews, subcontractor transparency, incident/red-flag escalation and reporting) and track performance using agreed procurement KPIs/KRIs	<b>Planned</b>
Review and uplift the end-to-end procurement due diligence framework (including effectiveness of controls and supplier outcomes) and refresh the next multi-year procurement modern slavery roadmap based on lessons learned and trend results	<b>Planned</b>
<b>Human resources and recruitment</b>	
Implement modern slavery training in MACSLearn for relevant staff via new starter induction and targeted role-based learning for People & Culture, school HR/leadership roles, and managers engaging contractors/labour hire	<b>In progress</b>
Embed modern slavery risk controls into recruitment and onboarding processes (e.g., right-to-work/visa verification, agency and contractor onboarding checks)	<b>In progress</b>
Strengthen labour hire and contractor management requirements (approved provider list/controls, minimum contract terms, periodic compliance attestations, and escalation pathways for addressing non-compliant or breach of contract behaviours), aligned to the Victorian Labour Hire Licensing Scheme and MACS policies	<b>Planned</b>
Build internal assurance around HR-related controls (sample-based checks of labour hire engagements, contractor onboarding records, and visa/right-to-work compliance), with findings and actions tracked to closure	<b>In progress</b>
Review effectiveness of HR and recruitment modern slavery controls (training completion and effectiveness, labour hire compliance outcomes, incident trends) and refresh the next multi-year People & Culture uplift plan	<b>Planned</b>

## MACSEYE

Action	Status
<b>Management systems</b>	
Develop a Modern Slavery Action Plan aligned with MACS Group expectations and tailored to early years education and care	<b>Revised annually</b>
Identify internal roles responsible for modern slavery risk management and governance oversight	<b>Complete</b>
<b>Risk management</b>	
Undertake a baseline modern slavery risk assessment for MACSEYE's operations and key supplier categories	<b>Complete</b>
Embed modern slavery risk management into overall enterprise risk management framework	<b>In progress</b>
<b>Procurement and supply chain</b>	
Commence integrating modern slavery considerations into procurement activities and supplier onboarding	<b>In progress</b>
Analyse existing high-risk suppliers to determine any remedial actions required (i.e. Sedex participation, discontinued use, etc.)	<b>Planned</b>
<b>Human resources and recruitment</b>	
Identify relevant staff to complete ACAN e-learning modules on modern slavery awareness	<b>Complete</b>
Embed ACAN e-Learning into ongoing role-based training requirements	<b>Planned</b>

## CDF

Action	Status
<b>Management systems</b>	
Continue to develop policies, principles and processes that address modern slavery and integrate these into everyday practices	<b>In progress</b>
Integrate anti-slavery ACAN assessment into governance structures	<b>In progress</b>
<b>Risk management</b>	
Ensure ongoing uplift of Risk Management Framework, which includes risk culture, to identify, assess, monitor and manage risk in operations and supply chains	<b>In progress</b>
Ensure Risk and Compliance related policies remain up to date and appropriate to the CDF Group	<b>Complete</b>
Ensure visibility of Domus 8.7 independent remediation service	<b>Complete</b>
<b>Procurement and supply chain</b>	
Inform outsourcing service providers or suppliers of anti-slavery measures, including updated contract clauses	<b>In progress</b>
Implement outsourcing service provider or supplier due diligence via ACAN as part of onboarding and ongoing contract review processes	<b>In progress</b>
Implement process for ongoing supplier review including following up on adverse findings	<b>In progress</b>
Implement updated contract clauses that extend to anti-slavery measures	<b>In progress</b>
<b>Human resources and recruitment</b>	
Implement Modern Slavery Awareness training	<b>In progress</b>

# Measuring effectiveness

## The Archdiocese

The Archdiocese assesses the effectiveness of its actions to address modern slavery risks through a combination of quantitative metrics, trend analysis, and ongoing review of internal capability and supplier engagement activities. This includes monitoring key indicators such as staff training participation, supplier engagement through platforms such as ACAN and Sedex, the number of suppliers identified within higher-risk categories, and the extent of due diligence activities undertaken, including supplier self-assessments, audits, and corrective actions.

Over the reporting period, the Archdiocese has observed a significant increase in the level of effort dedicated to modern slavery risk management, alongside a marked uplift in supplier engagement and improved identification of higher-risk suppliers. These trends reflect a transition from foundational awareness to a more structured and targeted approach. At the same time, the Archdiocese recognises that further work is required to ensure consistency and depth across its program. In particular, variability in supplier data quality, relatively low completion rates of detailed supplier self-assessment questionnaires, and limited audit and remediation activity highlight areas for continued focus.

Strengthening these mechanisms will be an important area of focus to improve visibility of potential impacts and to support appropriate responses where risks are identified.

These insights are used to inform a rolling, multi-year action plan as outlined above.

## The Archdiocese baseline data

Activity	2023 Catholic Archdiocese of Melbourne	2024 Catholic Archdiocese of Melbourne	2025 Catholic Archdiocese of Melbourne
<b>Internal / staff</b>			
Hours spent on modern slavery activities	50	55	200
Individual staff completed e-learning	0	0	13
E-learning modules completed	0	0	13
<b>External / supplier engagement</b>			
Total number of suppliers	1156	974	1089
Number of suppliers with visible contact information and ABN	45	889	41
Number of suppliers across high-risk categories	31	220	264
Number of ACAN Supplier Surveys completed	4	90	139
Supplier staff attending capacity building webinars	3	6	17
Invited to join Sedex	0	18	41
Joined Sedex	1	29	28
Sedex SAQ completed	2	7	12
Social audits	1	1	1
Corrective actions	0	25	4
<b>Domus 8.7 external referrals</b>			
Contacts made via worker voice/grievance mechanism	0	0	0
Referrals for advice and assistance	0	0	0
Individuals identified or referred for modern slavery assessment	0	0	0
Individuals with modern slavery cases remediated	0	0	0

## MACS

MACS assessed the effectiveness of the 2025 actions by linking delivery to measurable outcomes, and reviewing how these activities improved visibility and strengthened controls.

This included reviewing results from the ACAN-led supplier engagement program (including the identification and engagement of high-risk suppliers, ACAN Supplier Surveys completed during 2025, Sedex onboarding activity, and ACAN review of SAQ responses to identify material gaps and priority areas for capacity building) and confirming what follow-up actions were undertaken (for example, additional supplier engagement, capability building, corrective actions, escalation decisions, and changes to supplier selection and contracting where required).

MACS also assessed whether entity-specific actions were embedded in business-as-usual processes, including the incorporation of modern slavery risks into enterprise/directorate/school risk registers with clear ownership and escalation pathways, improved accessibility and awareness through publication of the Modern Slavery Statement, and establishment of MACSLearn with access to the ACAN e-learning module to support role-based capability uplift. Learnings from this assessment were used to inform the development of MACS' 2026 to 2030 action plan, prioritising system-enabled reporting and accountability, risk-based procurement controls, strengthened supplier due diligence and follow-up, and ongoing workforce capability building.

## MACS baseline data

Activity	2023 Melbourne Archdiocese Catholic Schools	2024 Melbourne Archdiocese Catholic Schools	2025 Melbourne Archdiocese Catholic Schools
<b>Internal / staff</b>			
Hours spent on modern slavery activities	60	85	100
Individual staff completed e-learning	0	9	0
E-learning modules completed	0	45	48
<b>External / supplier engagement</b>			
Total number of suppliers	30579	31765	32051
Number of suppliers with visible contact information and ABN	13897	1	1220
Number of suppliers across high-risk categories	10254	8369	14511
Number of ACAN Supplier Surveys completed	849	1305	2010
Supplier staff attending capacity building webinars	344	54	36
Invited to join Sedex	370	183	164
Joined Sedex	57	151	169
Sedex SAQ completed	17	111	129
Social audits	2	17	18
Corrective actions	0	75	135
<b>Domus 8.7 external referrals</b>			
Contacts made via worker voice/grievance mechanism	0	0	0
Referrals for advice and assistance	0	0	1
Individuals identified or referred for modern slavery assessment	0	0	6
Individuals with modern slavery cases remediated	0	0	0

## MACSEYE

During 2025, MACSEYE laid the foundation for effective modern slavery risk management by identifying the roles responsible for modern slavery risk management and oversight, introducing the ACAN e-learning modules into the suite of role-based training for these roles and undertaking a baseline modern slavery risk assessment of MACSEYE's 2025 third party expenditure by key supplier category based on ACAN's taxonomy. MACSEYE will continue to work with ACAN to ensure material suppliers participate in the Supplier Ethical Data Exchange (**Sedex**).

As 2025 represents MACSEYE's first full year of operation, the data reported for this period has been adopted as the baseline against which future performance and year on year improvements will be measured.

Activity	2024 MACSEYE	2025 MACSEYE
<b>Internal / staff</b>		
Hours spent on modern slavery activities	0	28
Individual staff completed e-learning	0	0
E-learning modules completed	0	0
<b>External / supplier engagement</b>		
Total number of suppliers	0	250
Number of suppliers with visible contact information and ABN	0	250
Number of suppliers across high-risk categories	0	104
Number of ACAN Supplier Surveys completed	0	95
Supplier staff attending capacity building webinars	0	15
Invited to join Sedex	0	29
Joined Sedex	0	26
Sedex SAQ completed	0	17
Social audits	0	0
Corrective actions	0	0

## CDF baseline data

Activity	2023 Catholic Development Fund	2024 Catholic Development Fund	2025 Catholic Development Fund
<b>Internal / staff</b>			
Hours spent on modern slavery activities	15	15	60
Individual staff completed e-learning	0	0	0
E-learning modules completed	0	0	0
<b>External / supplier engagement</b>			
Total number of suppliers	207	191	216
Number of suppliers with visible contact information and ABN	0	172	189
Number of suppliers across high-risk categories	41	45	32
Number of ACAN Supplier Surveys completed	20	30	52
Supplier staff attending capacity building webinars	0	4	16
Invited to join Sedex	0	1	5
Joined Sedex	5	18	14
Sedex SAQ completed	0	2	4
Social audits	0	0	0
Corrective actions	0	0	0
<b>Domus 8.7 external referrals</b>			
Contacts made via worker voice/grievance mechanism	0	0	0
Referrals for advice and assistance	0	0	0
Individuals identified or referred for modern slavery assessment	0	0	0
Individuals with modern slavery cases remediated	0	0	0

## Domus 8.7 external referrals for the Archdiocese, MACS, MACSEYE and CDF

Activity	2023 The Archdiocese, MACS, MACSEYE, and CDF	2024 The Archdiocese, MACS, MACSEYE, and CDF	2025 The Archdiocese, MACS, MACSEYE, and CDF
<b>Domus 8.7 external referrals</b>			
Contacts made via worker voice / grievance mechanism	0	0	0
Referrals for advice and assistance	0	0	1
Individuals identified or referred for modern slavery assessment	0	0	0
Individuals with modern slavery cases remediated	0	0	0

# Continuous improvement

The Archdiocese continues to progress from a foundational approach toward a more structured and targeted program for managing modern slavery risks. Overall maturity is assessed as developing, progressing toward a more defined and embedded state. Analysis of program data indicates a significant uplift in effort and engagement during the reporting period. This includes increased internal resourcing, stronger supplier engagement through initiatives such as ACAN and Sedex, and improved identification of higher-risk suppliers across key procurement categories. These developments reflect a growing level of maturity and a more intentional approach to risk management.

Key areas for continued focus include strengthening data integrity and supplier visibility, increasing the depth and coverage of due diligence activities (including supplier self-assessments and audits), embedding capability across relevant internal functions, and improving visibility of potential impacts within supply chains, including through worker voice and remediation pathways.

## **MACS' priorities are to evolve and mature the approach to managing modern slavery risks in operations and supply chains through the following activities:**

- Progressively embed modern slavery governance, controls, reporting and action tracking within core management systems (e.g., MACSGuard) to improve visibility, accountability and decision-making over time
- Maintain a modern slavery risk register with defined owners, review cycles, escalation thresholds, assurance activities and meaningful KRIs/KPIs to support a consistent, risk-based approach and continuous improvement
- Embed modern slavery due diligence into sourcing and contracting (RFX requirements, risk "gates", supplier onboarding and contract management) and use supplier engagement and corrective action plans to lift supplier practices in priority/high-risk categories
- Strengthen internal capability and workforce-related controls through role-based training, recruitment/onboarding checks, labour hire and contractor oversight, and periodic assurance to identify and respond to modern slavery red flags.

## **MACSEYE's priorities are to:**

- Implement training programs to build staff capability and awareness of modern slavery risks, especially for roles involved in purchasing and contractor management activities
- Proactively engage ACAN identified high-risk category suppliers to join SEDEX and complete self-assessment questionnaires (SAQ)
- Establish and integrate modern slavery risk management protocols at each stage of the procurement process, including proposal development, tender evaluations, contract award, contract management, and supplier onboarding.

## **CDF's priorities are to:**

- Continue to develop policies, principles and processes that address modern slavery and integrate these into everyday practices
- Integrate anti-slavery ACAN assessment into governance structures
- Ensure ongoing uplift of the Risk Management Framework and supporting policies and frameworks (including risk culture), to identify, assess, monitor and manage risk in operations and supply chains
- Inform outsourcing service providers or suppliers of anti-slavery measures, including updated contract clauses
- Implement outsourcing service provider or supplier due diligence via ACAN as part of onboarding and ongoing contract review processes
- Implement updated contract clauses that extend to anti-slavery measures
- Implement modern slavery training as part of the CDF Mandatory Learning Program
- Engage outsourcing service providers or suppliers to join SEDEX.

## Consultation

The Archdiocese consulted with its Reporting Entities through a structured and sustained process of engagement. A Modern Slavery Working Group, comprising representatives from each entity, met regularly over a six-month period leading up to the preparation of the joint statement. This forum supported data collection, informed the development of content, and ensured each entity maintained appropriate oversight and control of its disclosures.

Across this process, all entities also engaged with the ACAN, drawing on its guidance and resources to support a consistent and informed approach to identifying and managing modern slavery risks.

This collaborative approach was complemented by entity-specific internal consultation, review and approval processes to ensure the statement reflects a coordinated, accurate and consistent approach across the group:

- The Archdiocese consulted internally with People and Culture, Legal, Risk, Property and Infrastructure, Finance, and its service provider Cushman & Wakefield;
- MACS undertook extensive consultation with its internal Modern Slavery Working Group, and departments including Procurement, Infrastructure, Legal, Communications, Risk, Compliance, People and Culture, Strategy, Company Secretary, and Finance;
- MACSEYE consulted with its parent entity MACS, as well as the Archdiocese and CDF; and
- CDF consulted with its Risk function and key departments including IT, Marketing and Client Services.

The Archdiocese and its Reporting Entities are committed to continuing this engagement throughout the year, fostering a community of practice that enables shared learning, collaboration, and continuous improvement across each entity's experience in managing modern slavery risks.

## CRITERIA 7

There is no additional information to be included in the Statement.

# Appendix A

## Organisation charts

### The Archdiocese

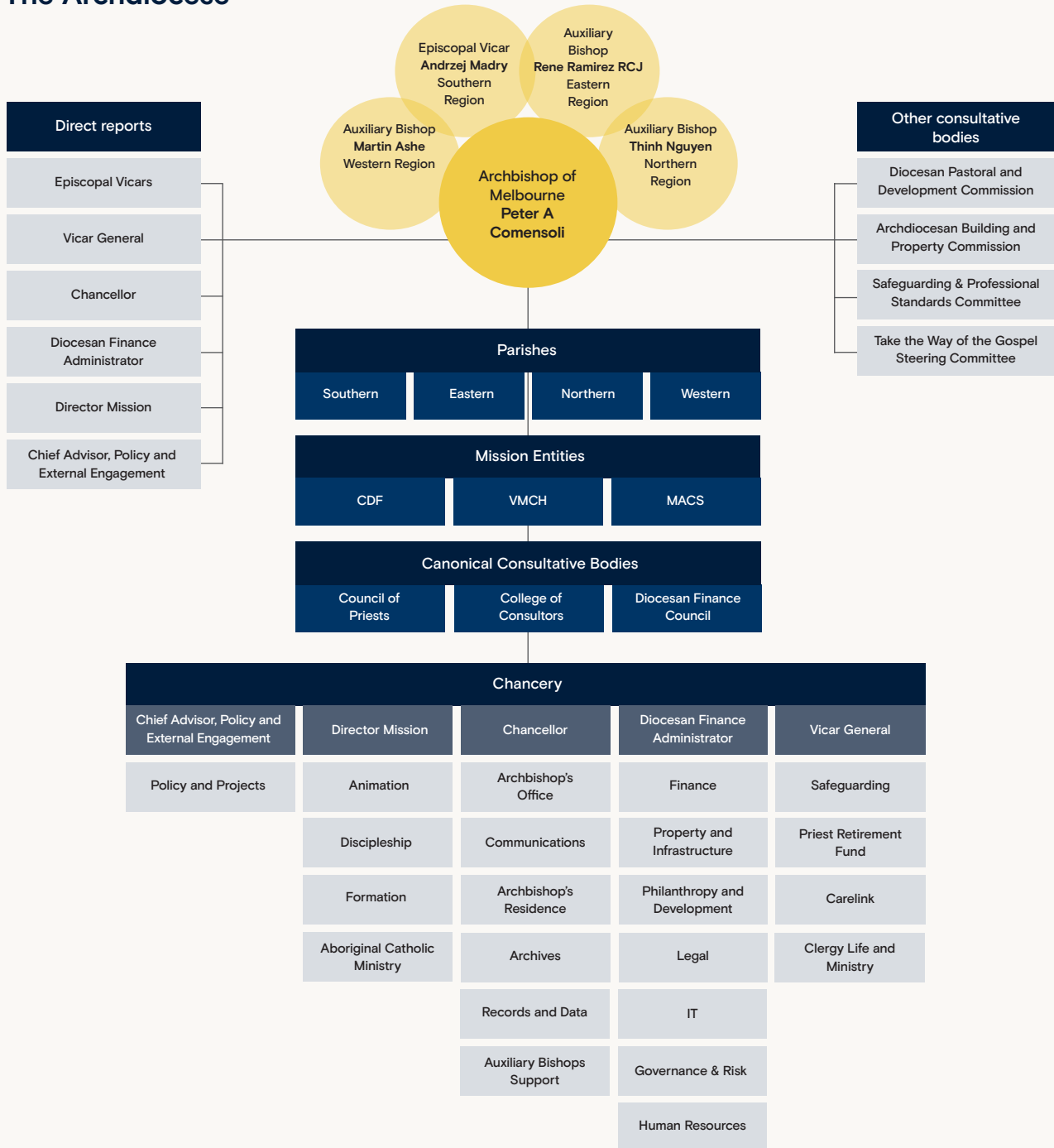
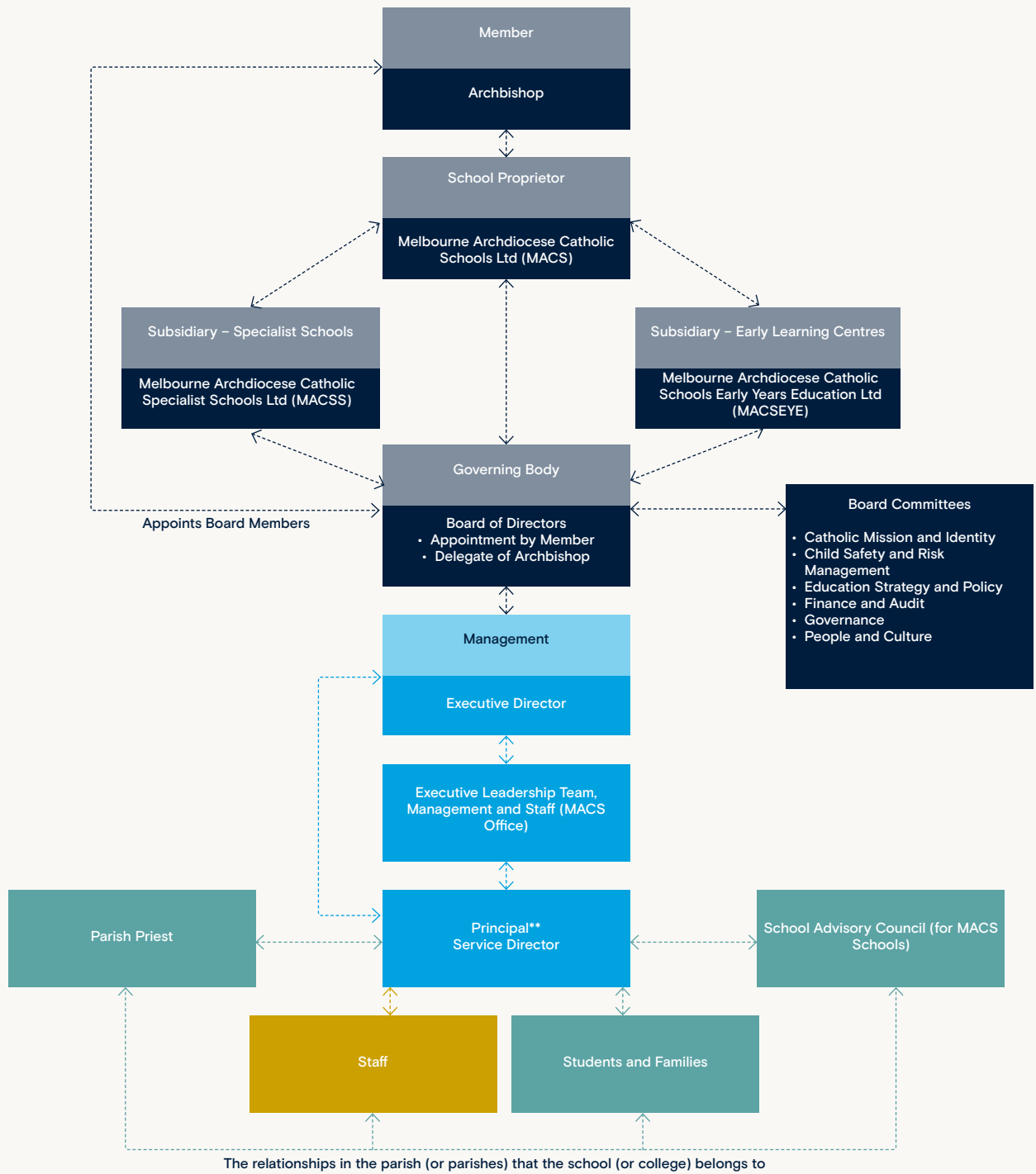


Figure 1: Organisational structure of Catholic Archdiocese of Melbourne (at 31 December 2025)

# MACS



● Governance ● Management ● Employees ● Community

\*\* principal executive officer (PEO) for Commonwealth Register of Institutions and Courses for Overseas Students (CRICOS), chief executive officer (CEO) for registered training organisation (RTO) and PEO for student exchange organisation (SEO)

Figure 2: Organisational structure of Melbourne Archdiocese Catholic Schools (at 31 December 2025)

## MACSEYE

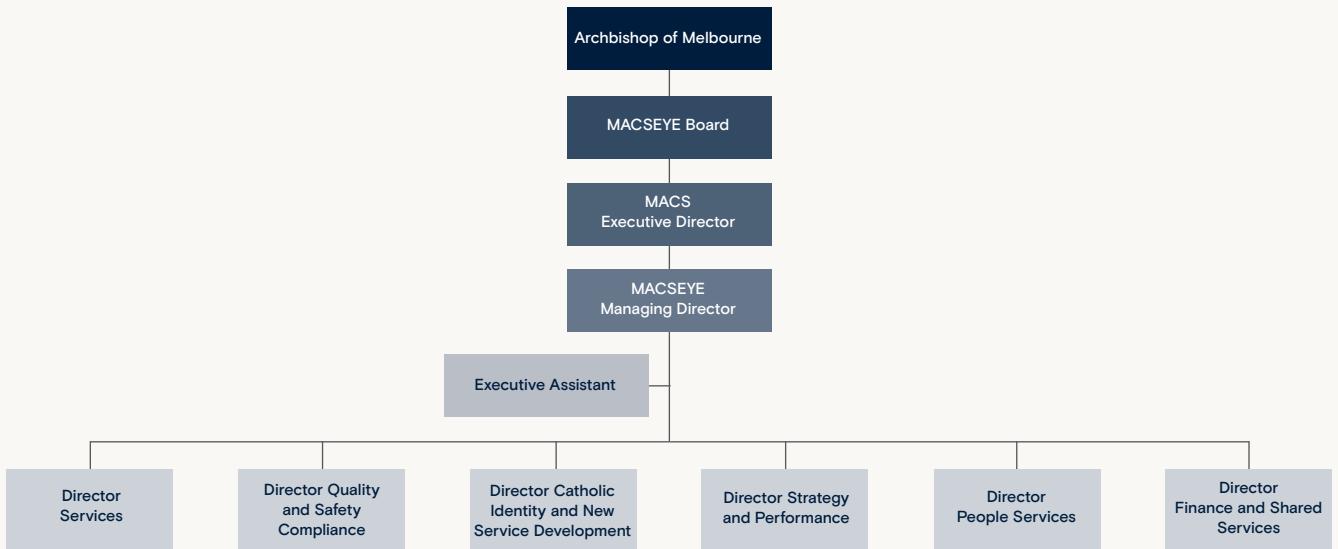


Figure 3: Organisational Structure of Melbourne Archdiocese Catholic Schools Early Years Education (31 December 2025)

## CDF

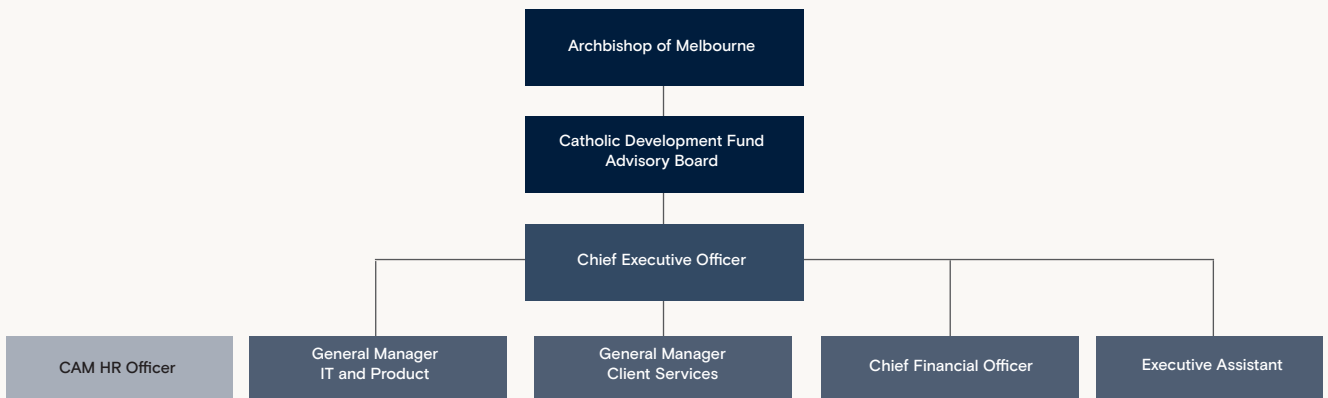


Figure 4: Organisational Structure of Catholic Development Fund (at 31 December 2025)

