



Melbourne Archdiocese
Catholic Schools

MACseye



Modern Slavery Statement 2024

Disclosure Note

This Modern Slavery Statement (Statement) has been produced on behalf of The Catholic Archdiocese of Melbourne (the Archdiocese).

This modern slavery statement is a joint statement made on behalf of the below reporting entities all of whom share the Archbishop Peter A Comensoli as the principal stakeholder.

<https://melbournecatholic.org/modern-slavery-statement>

In the Statement we will refer to the "Catholic Archdiocese of Melbourne (the Archdiocese)", as a single name reference to include agencies.

This statement does not cover Villa Maria Catholic Homes (VMCH).

VMCH have produced a separate Modern Slavery Statement for 2024.

This statement was approved by the Most Rev Peter A Comensoli,
Archbishop of Melbourne on 22 June 2025.

The Catholic Archdiocese of Melbourne, 383 Albert Street,
East Melbourne (ABN 64 047 619 369)

<https://melbournecatholic.org/>



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Statement from

Most Rev Peter A Comensoli, Archbishop of Melbourne



As we enter a new year – a Jubilee year of Hope for the universal Church, we renew our commitment as a Catholic community to affirm the inherent dignity and value of every person, recognising that all are made in the image of God. Together, we share the responsibility to protect the rights and freedom of all, with a particular focus on the most vulnerable and forgotten members of our global community.

Modern slavery takes many forms and can affect individuals of all ages and backgrounds, too often lying hidden behind the conveniences and comforts we enjoy in society. Fighting exploitation and striving to end any form of human suffering must remain at the forefront of our shared mission, particularly in the context of our Christian faith and daily living.

The Catholic Archdiocese of Melbourne, along with its agencies, continues to serve as a model of education, advocacy and practical action in addressing this issue. By embedding a commitment to eradicating modern slavery within our own operations and supply chains, we embody the principles of Catholic Social Teaching and take decisive action to end the dehumanising exploitation of others. This is our commitment to protect both present and future generations.

Once again, I reaffirm this Statement as part of the Australian Catholic Anti-Slavery Network (ACAN) Compendium of Catholic Modern Slavery Statements. This Compendium is a crucial record of the collaborative efforts across the Church in Australia to provide actionable ways we can address this pressing issue together.

The Archdiocese remains committed to strengthening its due diligence processes, identifying risks within our supply chains, updating policies, agreements, contracts and templates to reflect our unwavering commitment to human rights. We will continue to drive best practices in all our agencies, working towards the eradication of modern slavery in our time.

I am deeply grateful to those whose wisdom and expertise have contributed to the preparation of this Statement and acknowledge the tireless efforts of the staff across our Archdiocese who are dedicated to implementing lasting change and good practice.

As Archbishop, I formally approve and endorse this Modern Slavery Statement for the Catholic Archdiocese of Melbourne, as required by the Modern Slavery Act 2018 (Cth) ("the Act") on 22 June 2025. I also confirm the renewal of the Archdiocese's participation in the ACAN Program for 2023-2026.

May St. Josephine Bakhita, our Patron Saint for all victims of modern slavery and human trafficking, intercede for all those enslaved among us and help survivors find healing from their wounds.

With every grace and blessing,

Yours sincerely in Christ Jesus,

Most Rev Peter A Comensoli
ARCHBISHOP OF MELBOURNE

CRITERIA 1 AND 2

About the Archdiocese, MACS and CDF

This modern slavery statement is a joint statement made on behalf of the following three reporting entities all of whom share the Archbishop Peter A Comensoli as the principal stakeholder.

Catholic Archdiocese of Melbourne (the Archdiocese)	ABN 64 047 619 369
Melbourne Archdiocese Catholic Schools Ltd (MACS)	ABN 18 643 442 371
Subsidiaries of Melbourne Archdiocese Catholic Schools:	
• Melbourne Archdiocese Early Years Education Ltd	ABN 37 653 741 612
• Melbourne Archdiocese Specialist Schools Ltd	ABN 75 653 741 836
Catholic Development Fund (CDF)	ABN 15 274 943 760

All the 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.

The Catholic Archdiocese of Melbourne

The Catholic Archdiocese of Melbourne is devoted to the wellbeing of parishioners across greater Melbourne. Our area of service is communities, located around Port Phillip Bay in an area as vast as Yarraville to Yea, Craigieburn to Croydon, Geelong to Greensborough, Healesville to Hadfield, Bayside to Boronia, Dromana to Deer Park.

Presided over by the Archbishop of Melbourne, the Archdiocese comprises approximately 1 million Catholics and is the largest Archdiocese in Australia with a wide variety of people, cultures and ministries, providing services and support including pastoral, educational, social welfare and administrative support to 199 parishes.

The parishes are the mission of the Catholic Church to the faithful and to the broader community and offer religious services, marriages, baptisms, funerals and other support as part of their outreach.

The Catholic community in Melbourne is made up of a rich tapestry of people, of all ages, cultures and backgrounds. Although we all come from different walks of life, we are united by our faith and our love for God and neighbour. We strive to live our lives according to the way of Jesus Christ in our homes, our workplaces and throughout the wider community.

We draw strength from our parish communities and a wide range of organisations and agencies — where we care for one another — and in the deep love of God. One of our key priorities is to support the poor, the broken, the marginalised and those living with disability. This informs and animates our actions to eradicate modern slavery.

Founded in the nineteenth century, during a time of great challenge, the Melbourne Catholic education community created an enduring system that now numbers 291 schools.

The broad spectrum of schools includes local parish primary schools, regional colleges and special education facilities. The field also includes Catholic universities, chaplaincies, teaching colleges and other academic faculties that service an ever-changing educational enterprise.

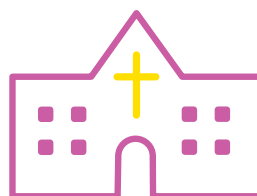
Melbourne Archdiocese Catholic Schools

Archbishop Peter A Comensoli established Melbourne Archdiocese Catholic Schools (MACS) to be responsible for the governance and operation of parish primary schools and regional and archdiocesan secondary colleges in the Archdiocese of Melbourne and Melbourne Archdiocese Early Years Education Ltd (MACSEYE), as a wholly owned subsidiary of MACS, to be responsible for the governance and operation of early childhood education and care services.

Its governance and operation of approximately 291 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 in the Archdiocese that are not governed by MACS.



Educating more than
116,000 students



throughout
291 schools

MACS and its subsidiaries are responsible for advancing education and religion through an effective pursuit of Catholic education. This includes primary and secondary schools, kindergartens, preschools, out of school hours programs, boarding facilities and the provision of other services related or ancillary to the operation of MACS Catholic Schools.

Catholic Development Fund

Since 1956, CDF has been supporting communities and continually improving an approach that allows us to provide a unique level of financial support across our footprint of Catholic primary and secondary schools, parishes and more recently healthcare and social service providers.

Our primary role is to support the work of Catholic organisations. While this work is increasingly complex and as the demand for services grows, the needs of Catholic organisations can't always be met by the traditional banking sector. However, our values-based approach to lending, backed by our rigor and professionalism as a financial organisation, allows CDF to give Catholic organisations every possible chance to put their faith into action.

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

- We are guided by [Catholic Social Teaching](#), that provide a set of principles for building a society based on love, respect and human dignity;
- We are committed to the common good and the fact that we are a Development Fund and not a bank, means we have the freedom to support our customers, who otherwise may not be eligible for support from the traditional banking sector. In over 60 years of work devoted to the common good, CDF has never registered a bad debt; and
- Funding from within means Catholic endeavours and enterprises can be relatively self-sufficient, rather than relying on a banking system exposed to unpredictable and volatile market influences.

Investments with us continue to grow our social mission and demonstrate, through faith in action, the fundamental values of the Church and its very real contribution to a fair, cohesive and productive society.

Mission and strategy

The Archdiocese

Archbishop Comensoli:

“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.”

MACS

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.

MACSEYE

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

Although MACSEYE maintains a distinct governance structure, it forms part of the MACS Group for the purposes of modern slavery reporting under the Modern Slavery Act 2018 (Cth).

MACSEYE’s 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, including modern slavery risk management.

It aligns with MACS’ broader commitment to ethical procurement and human rights due diligence and will progressively embed modern slavery risk controls as operations expand in 2025.

CDF

CDF, in support of the mission of the Catholic Church, provides capital funding and financial solutions for the establishment and operation of Catholic organisations, primarily but not exclusively, within the Archdiocese of Melbourne, Diocese of Ballarat, Diocese of Bunbury and Diocese of Sale.

It does this by pooling the savings of the Catholic community to fund the constructions of schools, parishes, hospitals, aged care and social service facilities.

Organisational structure and geographic regions

The Archdiocese

The organisational structure of the Catholic Archdiocese of Melbourne is displayed in Figure 1 of Appendix A – Organisational charts (Page 27). The Chancery Office of the Archdiocese is located in East Melbourne.

MACS

The organisational structure of Melbourne Archdiocese Catholic Schools is displayed in Figure 2 of Appendix A – Organisational charts (Page 28).

MACS Head Office and the Catholic Leadership Centre are 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.

Operations commenced on 1 January 2021, including Catholic Education Melbourne ceasing and becoming part of MACS with the 291 schools.

CDF

The organisational structure of the Catholic Development Fund is displayed in Figure 4 of Appendix A – Organisational charts (Page 29).

The CDF Head Office is based in East Melbourne and is supported by three regional Diocesan locations in Ballarat (VIC), Sale (VIC) and Bunbury (WA), with geographical staffing in these areas.

CDF Head Office also provides a range of services for the 18 Development Funds, situated across Australia and New Zealand, each funding a wide range of Catholic infrastructure to continue the Church's mission and better serve communities, including:

- 1 in 5 school students in Victoria
- 25% of Private Hospital Care in Australia
- 5% of Public Hospital Care in Australia
- 20% of Aged Care and support for the Elderly in Australia
- 22 Development Funds Across Australia

Governance framework

The Archdiocese

The Catholic Archdiocese of Melbourne 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 the 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.

MACS

The board of MACS was established in 2020 by Archbishop of Melbourne Peter A Comensoli.

The MACS board is responsible for ensuring the organisation meets all fiduciary and strategic requirements and that operations are aligned with our mission and purpose in fulfilment of ecclesial, legal and statutory obligations.

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

Archbishop Comensoli appoints the members of the board. The MACS board has established the following six board committees:

- Catholic Mission and Identity Committee
- Child Safety and Risk Management Committee
- Education Strategy and Policy Committee
- Finance and Audit Committee
- Governance Committee and
- People and Culture Committee

MACSEYE

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 standards, including the *Modern Slavery Act 2018 (Cth)*.

MACSEYE is included within the MACS group for the purposes of this Statement. While MACSEYE's first full year of operation will be 2025, the organisation commenced service delivery in the final quarter of 2024 and has begun laying the foundation for modern slavery risk management through ethical procurement practices and alignment with MACS' standards.

CDF

CDF is governed by the Archdiocese of Melbourne as an undertaking of the Archbishop and has an advisory board to the Archbishop.

The CDF has an Audit and Risk Committee and maintains a comprehensive set of policies including prudential standards, governance, General Manager's authorities, Investments, Deposits and Risk Management.

Profile and operations

The Archdiocese



Throughout the 2024 reporting period, the Archdiocese **engaged with**

974 suppliers

with a **total expenditure** of

\$52.3M.

MACS **total consolidated income** for the 2024 reporting period was

\$2.349B

The **main expenditure** being

\$1.622B

on the salaries of employees.

The CDF has an **annual revenue**

\$163.3M

and **expenditure** of approximately

\$97.5M

excluding the salaries of its 56 staff.

In its operations, the CDF engages principally with other **Catholic entities and banks.**

MACS



CDF



Summary of 2024 activities

Throughout 2024, the Archdiocese, MACS and CDF continued participation in the Australian Catholic Anti-Slavery Network modern slavery risk management program (ACAN Program). The ACAN Program provided the Archdiocese, MACS and CDF staff access to monthly webinars and e-newsletters, tools and templates, guidance materials and supplier engagement activities.

Other actions completed in 2024 by all three reporting entities include:

- The continuation of standard procurement practice to invite suppliers to join Sedex (Supplier Ethical Data Exchange), an online system that allows suppliers to maintain data on ethical and responsible practices and allows suppliers to share data with customers; and
- The acceleration of collecting supplier engagement data.

In addition to these activities, the Archdiocese also undertook the following:

- Improved data collection and the number of ACAN supplier surveys completed by suppliers;
- Ensured the new service provider agreement with Cushman & Wakefield embedded requirements to ensure all suppliers, consultants and contractors adhere to the Modern Slavery Act and take reasonable steps to ensure that no Modern Slavery exists in its business or supply chain; and
- Loaded the ACAN Modern Slavery training modules into the Archdiocese training platform ready for users to complete.

In addition to these activities, MACS also undertook the following:

- Further development of assurance activities and overarching governance and accountability for ethics compliance and modern slavery risk management;
- Included modern slavery as an independent risk on the enterprise risk register;
- Continued utilisation of ACAN resources to identify and engage tier 1 suppliers for Sedex membership and onboarding them onto the Sedex platform;
- Completed procurement process improvements and document enhancements, including standard agreement templates, to ensure that modern slavery risks are addressed throughout the procurement lifecycle; and
- Sourced a Learning Management System (LMS) that will be implemented during 2025. The LMS will make Modern Slavery 101 – Introduction to Modern Slavery training available to all staff and other ACAN e-learning modules available to selected staff.

CRITERIA 3

Modern slavery risks in operations and supply chains

Supply chain risk

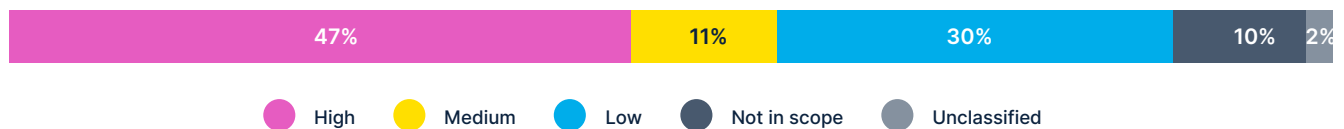
The Archdiocese

Analysis of the Archdiocese supply chain is based on ACAN risk taxonomy across 23 categories of geographic location, industry or sector, commodity, product category and workforce profile.

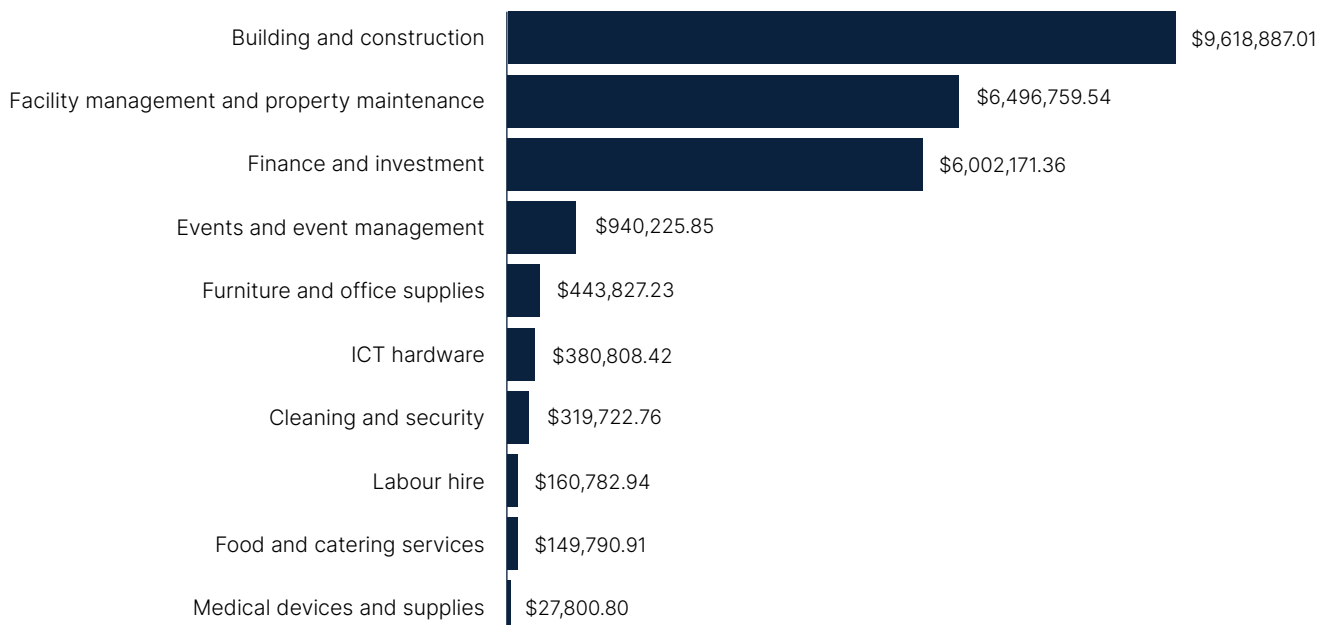
An analysis of the Archdiocese's 2024 spend on goods and services in these categories is represented in the charts below.

The Archdiocese Spend in High-Risk Categories

Spend Profile by Risk Taxonomy Category



The Archdiocese Spend in High Risk Procurement Categories



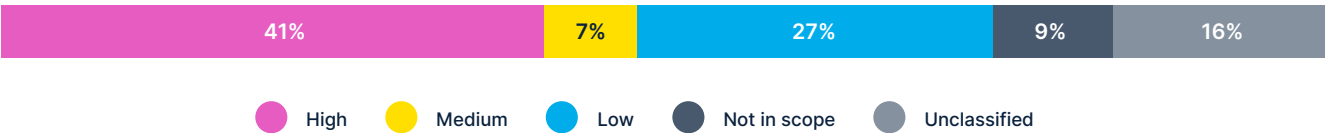
MACS

An analysis of MACS’ 2024 spend on goods and services in categories at high-risk of modern slavery 2024 is represented in the chart below.

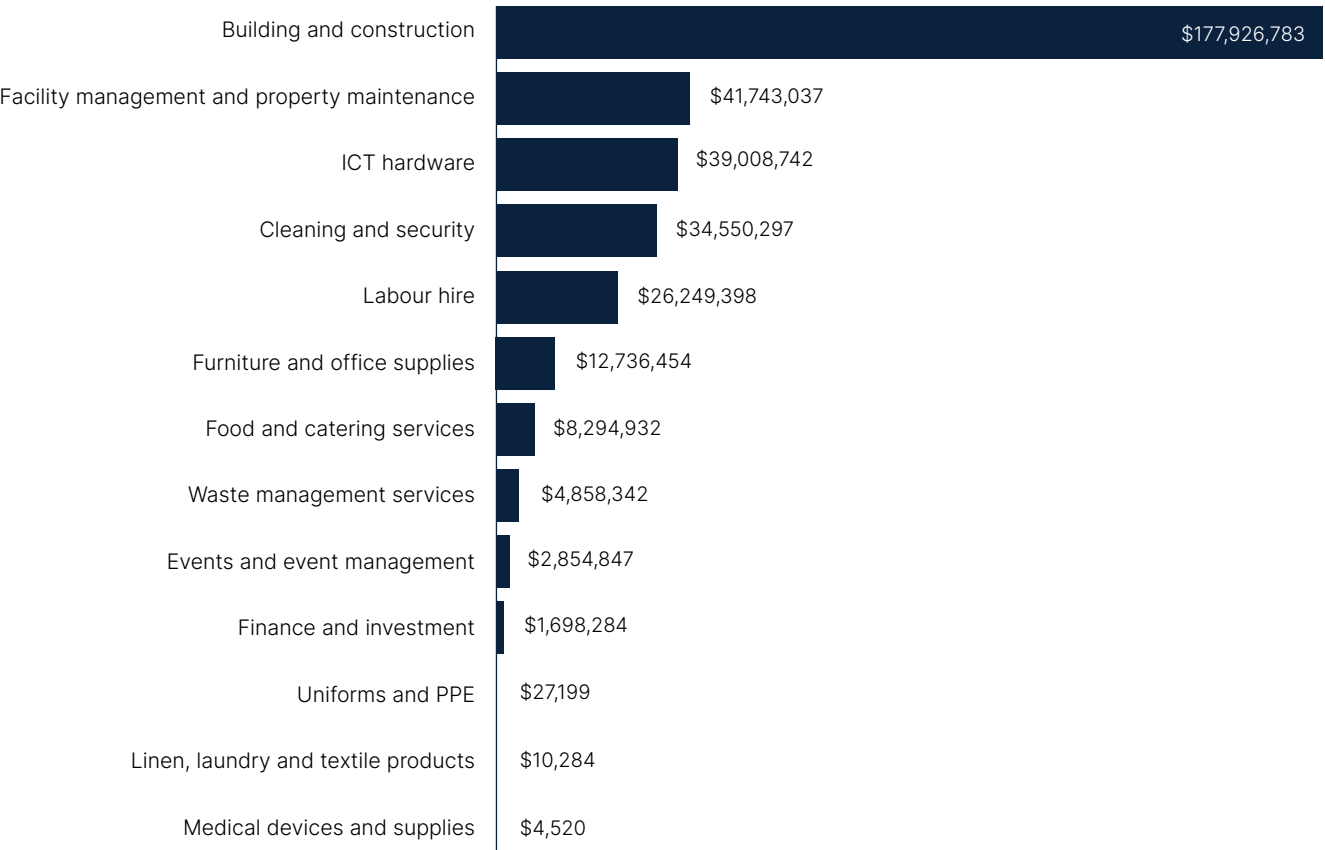
ACAN will continue to support MACS to engage with suppliers to develop a risk profile specific to each major supplier across operational activities and associated with the supply chains of goods.

MACS Spend in High-Risk Categories

Spend Profile by Risk Taxonomy Category



MACS Spend in High Risk Procurement Categories



MACSEYE

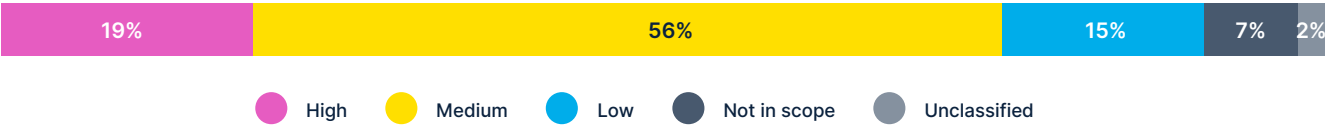
MACSEYE did not undertake a separate supply chain risk assessment in 2024 due to its commencement late in the reporting period as most expenditure was incurred via MACS’ systems and processes and thus factored into the above analysis (except for \$0.28m incurred directly by MACSEYE).

CDF

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

When engaging suppliers to deliver operational services, CDF tries to establish and maintain long-term relationships and to build trust and transparency.

Spend Profile by Risk Taxonomy Category



CDF Spend in High Risk Procurement Categories



Operational risk

Through the ACAN Program, the Archdiocese, MACS and CDF continue to focus activities with suppliers of labour and the operational risk associated, in the following high-risk labour supply chain areas.

The Archdiocese

Cleaning and security services

The cleaning and security sectors typically employ temporary migrant workers engaged via subcontracting arrangements with a high rate of noncompliance with workplace rights and entitlements.

Equipment and consumables used in these sectors are largely manufactured overseas, predominantly in high-risk countries such as China and Vietnam.

Facility management and property maintenance

The labour force used in facilities management generally consists of temporary migrant workers often contracted through labour hire companies.

BGIS and from October 2024 Cushman & Wakefield, procure Facilities Management and Property Services on behalf of the Archdiocese. As such, there are inherent modern slavery risks associated with the use of Australian based sub-contractors (and their sub-contractors/suppliers) and the overseas supply chain of materials and equipment.

Labour hire

Labour hire services pose a high risk for worker exploitation and modern slavery for several reasons, including:

- A focus on low-skilled, low-paid, seasonal, temporary labour;
- The recruitment of potentially vulnerable people such as new migrants, temporary work visa holders;
- International students and undocumented workers;
- Deceptive and opaque practices trapping workers into exploitative situations;
- Demanding excessive fees for visas, travel and other work arrangements, leading to debt bondage; and
- Coercive control, threats, withholding workers' identity documents to limit their freedom of movement and social isolation from community.

Waste management services

The waste industry (including recycling) is a dangerous sector for workers with significant Work Health and Safety risk such as exposure to toxic materials and pathogens, use of heavy machinery and dirty work environment.

Modern slavery risks are like those faced by cleaners. Sub-contracting to small waste management companies is common across the sector as is the use of labour hire.

Migrants and low-skilled workers are used in waste collection, handling and material recovery facilities.

MACS

MACS is responsible for the governance and operation of 291 parish primary schools, regional and archdiocesan secondary colleges in the Archdiocese of Melbourne in the greater Melbourne area.

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 our employees or volunteers and MACS 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).

Our 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.

In 2024, 18,866 people were employed by MACS, of which a high proportion (94%) 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 300 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 the employee's 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 our 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 had minimal additional operational risk exposure in 2024 with most of the expenditure incurred via MACS' systems and processes.

CRITERIA 4

Actions taken to assess and address risk

For the 2024 reporting period, the Archdiocese, MACS and CDF participated in the ACAN Program for assessing and addressing the risk of modern slavery within each respective organisation and followed the following supplier engagement plan:

- Identification of suppliers in high-risk procurement areas via ACAN Procurement Taxonomy;
- Suppliers in high-risk categories were invited to complete the ACAN Supplier Survey;
- Suppliers were assisted with the process to join Sedex and provided support to complete the Sedex Self-Assessment Questionnaires (SAQ); and
- ACAN Program Managers then assessed the SAQ results, identified gaps in the supplier's management system such as further training and capacity building areas and the development of risk management strategies.

The ACAN supplier engagement plan identified common suppliers shared across multiple Catholic entities within ACAN. As a result, this data increased leverage and reduced duplication of supplier engagement from multiple Catholic entities.

An important part of the supplier engagement plan included an invitation to suppliers from the Archdiocese, MACS and CDF to attend the 2024 ACAN webinar series. The purpose of the ACAN supplier webinar series was to assist suppliers to gain a fundamental understanding of modern slavery.



Overall, there were 1425 suppliers to the Archdiocese, MACS and CDF that completed the ACAN Supplier Survey and 64 suppliers attended the webinar series.

The ACAN Program supported suppliers with onboarding to Sedex and participation in assessment surveys, questionnaires, eLearning modules and webinars.

The Archdiocese, MACS and CDF intend that Sedex will be further utilised during 2025 to:

- Manage the risk of modern slavery with existing suppliers;
- Validate inherent risk against actual risk;
- Screen new suppliers as part of tenders and supplier on-boarding processes;
- Gain visibility further upstream in the supply chains; and
- Monitor and report on progress in the profile of suppliers.

E-learning

E-learning provides an important framework and foundation for the ACAN modern slavery risk management program.

The Archdiocese, MACS and CDF will incorporate the ACAN e-learning modules into their internal Learning Management System to provide greater oversight and accountability.

The ACAN modern slavery modules are summarised as follows:

- **Module 1:** Modern Slavery 101 (MS101)
- **Module 2:** Business Relevance
- **Module 3:** Implementing a Modern Slavery Risk Management Program
- **Module 4:** Grievance Mechanisms and Remedy

Remediation

The Archdiocese, MACS and CDF intend to provide appropriate and timely remedy to people impacted by modern slavery in accordance with the UN Guiding Principles on Business and Human Rights, Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities and other relevant Australian laws.

The remedy includes providing for, or cooperating in, actions to address harms to people and to mitigate future risks if the Archdiocese, MACS and CDF are found to have caused or contributed to modern slavery.

Due to the complexity of remediation, specialist resources are required to ensure the best outcomes for people impacted by modern slavery. To this end, the Archdiocese, MACS and CDF will access Domus 8.7 to provide remedy to people impacted by modern slavery.

Domus 8.7 is a not-for-profit unincorporated association established to act as a community and social welfare service for individuals, groups and entities who seek advice in relation to modern slavery, including providing relief to victims of modern slavery. Domus 8.7 will provide remediation services for people impacted by modern slavery and a confidential advisory service.

Through Domus 8.7, the Archdiocese, MACS and CDF will be able to help people impacted by modern slavery achieve outcomes that can be reported on and used to continuously improve risk management and operational response.

The Archdiocese, MACS and CDF staff and stakeholders are being equipped to recognise the causes of modern slavery and the mechanisms available to escalate poor labour practices, unsafe working conditions and other indicators of modern slavery.

When suspicions of modern slavery practices are notified through the whistle-blower service or other channels, staff will continue to contact relevant law enforcement agencies if a person is in immediate danger and Domus 8.7 for an assessment, investigation, action planning and implementation of a remediation process.

Action Plan 2025

The Archdiocese

Action	Status
Management Systems	
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.	In progress
Risk Management	
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
Procurement and Supply Chain	
Inform suppliers of anti-slavery measures, including updated contract clauses, supplier code of conduct and tender requirements.	Complete
Undertake supplier engagement via ACAN e-learning and on-boarding to Sedex, monitor and report on Sedex SAQ results.	In progress
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.	In progress
Human Resources and Recruitment	
Activate the ACAN e-learning modules and make available to staff, boards and senior management.	In progress

Most of the Archdiocese's risk relates to the Facilities Management and Property Services provided by BGIS for part of 2024 and transferred to Cushman & Wakefield for the final quarter of 2024. Both BGIS and Cushman & Wakefield prepare their own Modern Slavery Statement. Some of the key actions taken by BGIS and Cushman & Wakefield to mitigate Modern Slavery risk is to consider its existence in the development of the following:

- Policies, procedures and governance
- Code of business conduct and ethics
- Modern Slavery Act framework
- Sustainable procurement framework
- Procurement policy and sustainable procurement policy
- Vendor code of conduct
- Subcontracts
- Whistleblower policy
- Modern Slavery framework and supplier due diligence
- Anti-bribery and corruption
- Supplier pre-qualification
- Modern Slavery questionnaire

MACS

Action	Status
Risk Management	
Modern Slavery was included as an Enterprise level risk for MACS, as well as at a directorate level for Finance by the end of 2024. In 2025 it is being included as a risk for schools to consider as part of their school risk registers, as well as all programs related to international travel.	In progress
Procurement and Supply Chain	
Development of a Procurement Intranet site to include information on modern slavery statements and details of the action plans.	In progress
Human Resources and Recruitment	
Implement Learning Management System and make available the ACAN e-learning module 'Modern Slavery 101 – Introduction to Modern Slavery' available to all staff.	In progress

MACSEYE

Action	Status
Management Systems	
Develop a Modern Slavery Action Plan aligned with MACS Group expectations and tailored to early years education and care.	Planned
Identify internal roles responsible for modern slavery risk management and governance oversight.	Planned
Risk Management	
Undertake a baseline modern slavery risk assessment for MACSEYE's operations and key supplier categories.	Planned
Procurement and Supply Chain	
Commence integrating modern slavery considerations into procurement activities and supplier onboarding.	Planned
Human Resources and Recruitment	
Identify relevant staff to complete ACAN e-learning modules on modern slavery awareness.	Planned

CDF

Action	Status
Management Systems	
Continue to develop policies, principles and processes and integrate these into management tools.	In progress
Work to integrate anti-slavery into governance structure and define metrics to measure, manage, enhance reporting capabilities and develop KPIs.	In progress
Risk Management	
Continue working with partners to update risk management framework and define how to measure and understand risk in operations and supply chains.	In progress
Develop a process to periodically review and update the risk management framework, as understanding of modern slavery risk matures.	In progress
Procurement and Supply Chain	
Inform suppliers of anti-slavery measures, including updated contract clauses, supplier code of conduct and tender requirements.	In progress
Undertake supplier engagement via ACAN e-learning and on-boarding to Sedex, monitor and report on Sedex SAQ results.	In progress
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.	In progress
Human Resources and Recruitment	
Activate the ACAN e-learning modules and make available to staff, boards and senior management.	In progress

CRITERIA 5

Effectiveness assessment

During 2025 and beyond, the Archdiocese, MACS and CDF will continue to use its Sedex membership to improve visibility and reporting into supply chains.

The Sedex membership, as well as additional efforts to build anti-slavery capacity with suppliers and staff, will significantly reduce risk of being directly linked to modern slavery, lower the risk of directly causing modern slavery and diminish the risk of indirectly causing modern slavery.

A key priority is the enhancement of reporting capabilities, metrics and development of Key Performance Indicators (KPIs). KPIs will continue to be developed by the Archdiocese, MACS and CDF. To support the development of KPIs, baseline metrics have been developed to begin assessing the effectiveness of activities and initiatives.

The Archdiocese Baseline Data

Activity	2023 Catholic Archdiocese of Melbourne	2024 Catholic Archdiocese of Melbourne
INTERNAL / STAFF		
Hours spent on modern slavery activities	50	55
Individual staff completed e-learning	0	0
E-learning modules completed	0	0
EXTERNAL / SUPPLIER ENGAGEMENT		
Total number of suppliers	1156	974
Number of suppliers with visible contact information and ABN	45	889
Number of suppliers across high-risk categories	31	220
Number of ACAN Supplier Surveys completed	4	90
Supplier staff attending capacity building webinars	3	6
Invited to join Sedex	0	18
Joined Sedex	1	29
Sedex SAQ completed	2	7
Social audits	1	1
Corrective actions	0	25

The Baseline Data table above indicates that in 2025 the Archdiocese, needs to devote more time to educate their staff on modern slavery risk and more time with their suppliers to reduce the risk of modern slavery in the supply chains.

MACS Baseline Data

Activity	2023 Melbourne Archdiocese Catholic Schools	2024 Melbourne Archdiocese Catholic Schools
INTERNAL / STAFF		
Hours spent on modern slavery activities	60	85
Individual staff completed e-learning	0	9
E-learning modules completed	0	45
EXTERNAL / SUPPLIER ENGAGEMENT		
Total number of suppliers	30579	31765
Number of suppliers with visible contact information and ABN	13897	1
Number of suppliers across high-risk categories	10254	8369
Number of ACAN Supplier Surveys completed	849	1305
Supplier staff attending capacity building webinars	344	54
Invited to join Sedex	370	183
Joined Sedex	57	151
Sedex SAQ completed	17	111
Social audits	2	17
Corrective actions	0	75

MACSEYE

Given MACSEYE's operations only commenced in October 2024, modern slavery risk management activities were not yet in operation and therefore effectiveness could not be meaningfully assessed.

In 2025, MACSEYE will focus on implementing foundational actions, such as establishing governance oversight, beginning supplier engagement and developing a tailored action plan.

CDF Baseline Data

Activity	2023 Catholic Development Fund	2024 Catholic Development Fund
INTERNAL / STAFF		
Hours spent on modern slavery activities	15	15
Individual staff completed e-learning	0	0
E-learning modules completed	0	0
EXTERNAL / SUPPLIER ENGAGEMENT		
Total number of suppliers	207	191
Number of suppliers with visible contact information and ABN	0	43
Number of suppliers across high-risk categories	41	45
Number of ACAN Supplier Surveys completed	20	30
Supplier staff attending capacity building webinars	0	4
Invited to join Sedex	0	1
Joined Sedex	5	18
Sedex SAQ completed	0	2
Social audits	0	0
Corrective actions	0	0

The Effectiveness Baseline data shows a need to re-engage staff and a management as the last ACAN training was in 2022. It also shows that supplier engagement can be improved and will be part of the following year's action plan.

DOMUS 8.7 External Referrals for The Archdiocese, MACS and CDF

Activity	2023 The Archdiocese, MACS and CDF	2024 The Archdiocese, MACS and CDF
DOMUS 8.7 EXTERNAL REFERRALS		
Contacts made via worker voice / grievance mechanism	0	0
Referrals for advice and assistance	0	0
Individuals identified or referred for modern slavery assessment	0	0
Individuals with modern slavery cases remediated	0	0

Modern Slavery Maturity Assessment

During 2025, the Archdiocese and CDF will be committed to continually improving our approach to partnering with our stakeholders and working to reduce modern slavery.

The Archdiocese Action Plan is structured around the five risk categories analysed as part of the ACAN Maturity Assessment, with the Action Plan proposing specific initiatives across the categories, as well as annual recurrent actions.

The Archdiocese is progressing to identify and mitigate modern slavery risks in our practices and understands this is an ongoing process.

We seek to continuously refine and improve our approach to manage Modern Slavery Risks effectively and transparently.

In 2025, priorities of the Archdiocese are to:

- Continue to improve in the support and guidance we provide to our suppliers/contractors during our assessment;
- Continue to expand our training programs for staff and increase awareness of Modern Slavery risks, particularly to staff engaged in 3rd party purchasing activities and contractor engagement;
- Form a new Modern Slavery Working Group and appoint members to the group to ensure the action plan is implemented; and
- Identify a Modern Slavery Liaison Officer (MSLO).

MACS' priorities are to:

- Accelerate our increasing maturity in the areas of Business Process and Governance, Operations, Worker Engagement and Modern Slavery Program and Activities;
- Address the effectiveness of action planning and risk management; and
- Review the good progress being made in the areas of Supply Chain and Grievance Mechanisms and Remediation and adopt applicable learnings into areas where maturity needs to accelerate.

MACSEYE's priorities are to:

- Focus on building the necessary internal capability and systems to support modern slavery risk management, including developing a tailored Modern Slavery Action Plan, embedding initial procurement controls and identifying key roles responsible for oversight. These foundational steps will enable MACSEYE to undertake its first formal maturity assessment in a future reporting period, once core systems and processes are in place.

CDF's priorities are to:

- Continue to improve in the support and guidance we provide to our suppliers/contractors during our assessment;
- Roll out the updated ACAN training programs for staff and increase awareness of Modern Slavery risks, with emphasis on staff engaged in 3rd party purchasing activities and contractor engagement;
- Engage suppliers to join SEDEX; and
- Include Modern Slavery as a standard Agenda item for discussion and update at monthly management meetings.

CRITERIA 6

Consultation

The Archdiocese, MACS and CDF anticipate that our consultation process will continue to develop in future reporting periods.

The Archdiocese consulted with different departments including People and Culture, Legal, Risk, Property and Infrastructure, Finance and service provider Cushman & Wakefield when preparing this statement.

MACS has consulted widely with their subsidiaries, their MSWG and departments, such as Procurement, Legal, Communications, Risk, Compliance, People and Culture and Finance teams, when preparing this statement.

CDF consulted with CDF Risk officers and different departments within CDF such as IT, Marketing and Client Services when preparing this statement.

CRITERIA 7

Appendix A

Organisation charts

The Archdiocese

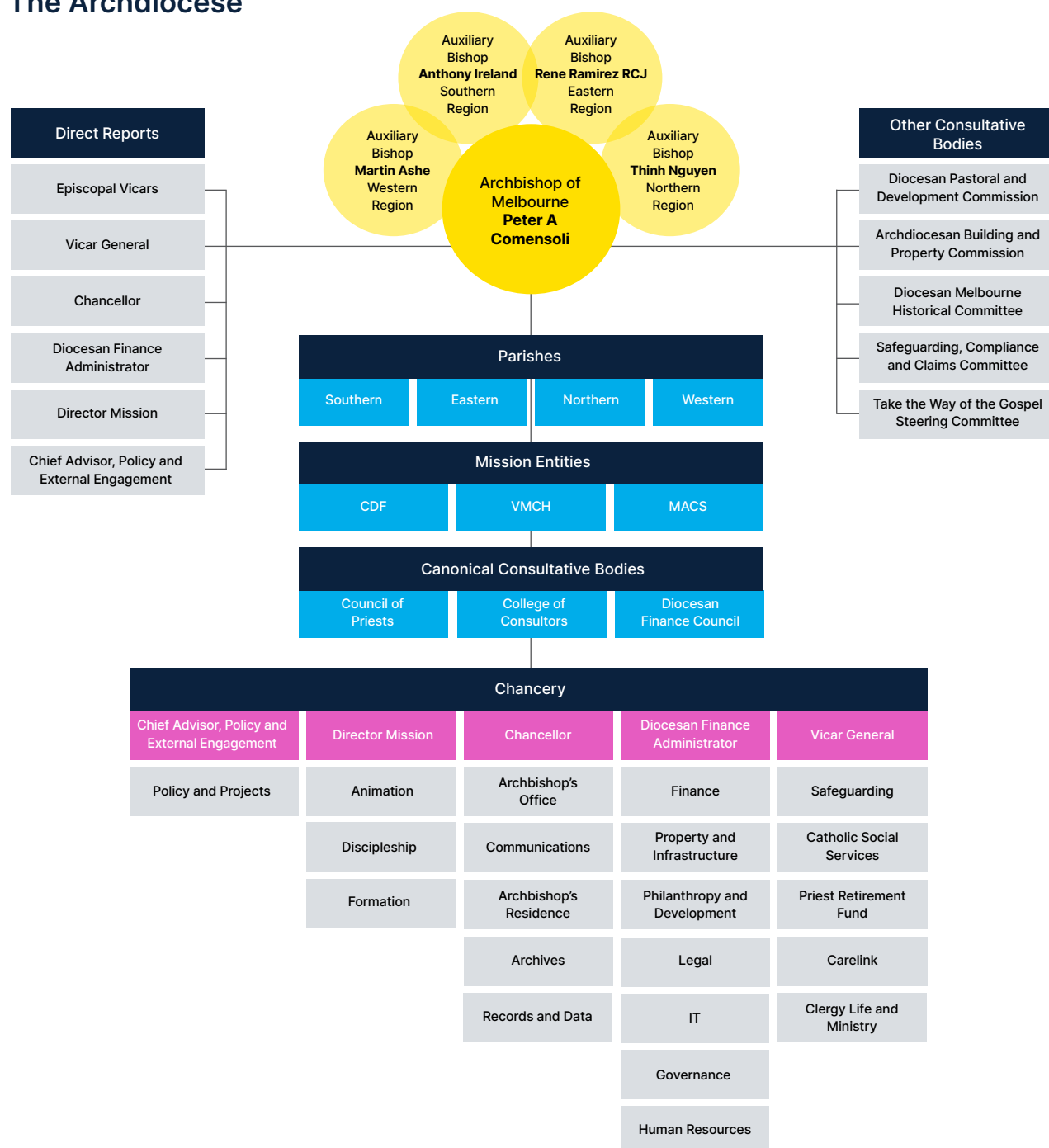


Figure 1: Organisational structure of Catholic Archdiocese of Melbourne (at 31 December 2024)

MACS

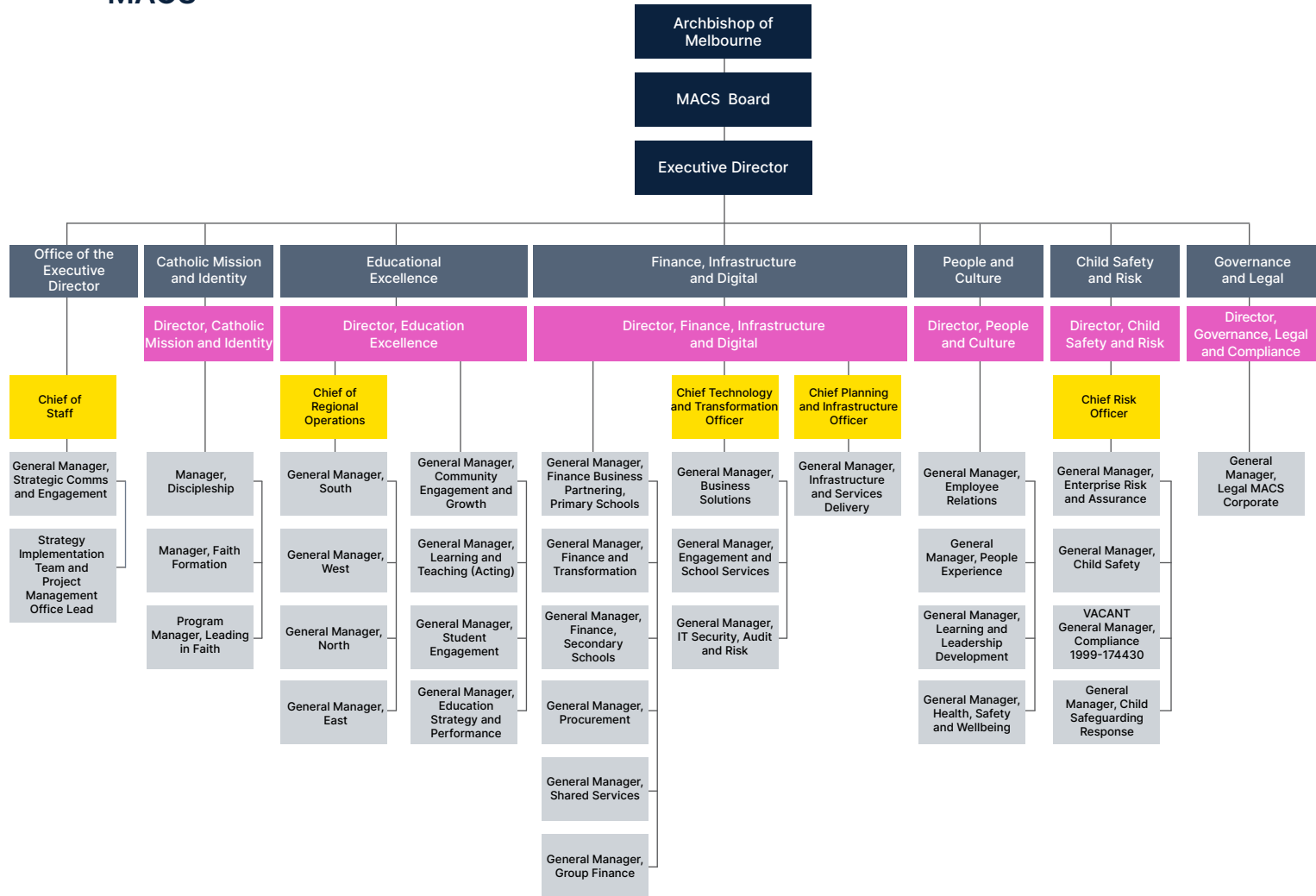


Figure 2: Organisational structure of Melbourne Archdiocese Catholic Schools (at 31 December 2024)

MACSEYE

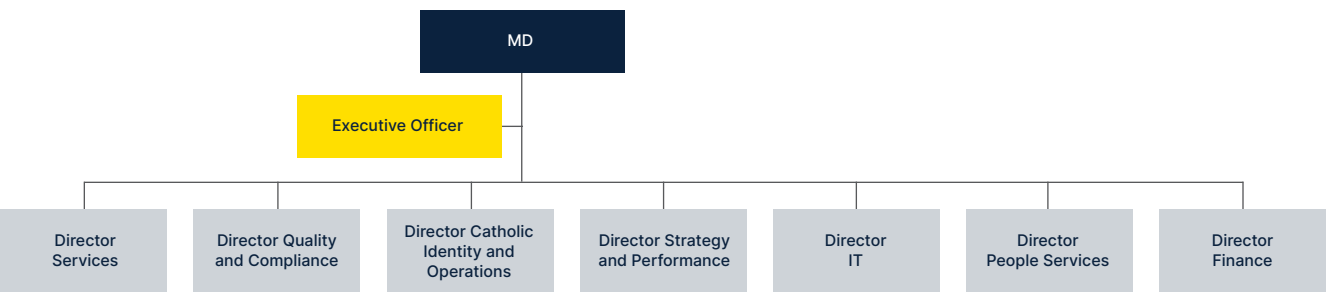


Figure 3: Organisational Structure of Melbourne Archdiocese Catholic Schools Early Years Education (31 December 2024)

CDF

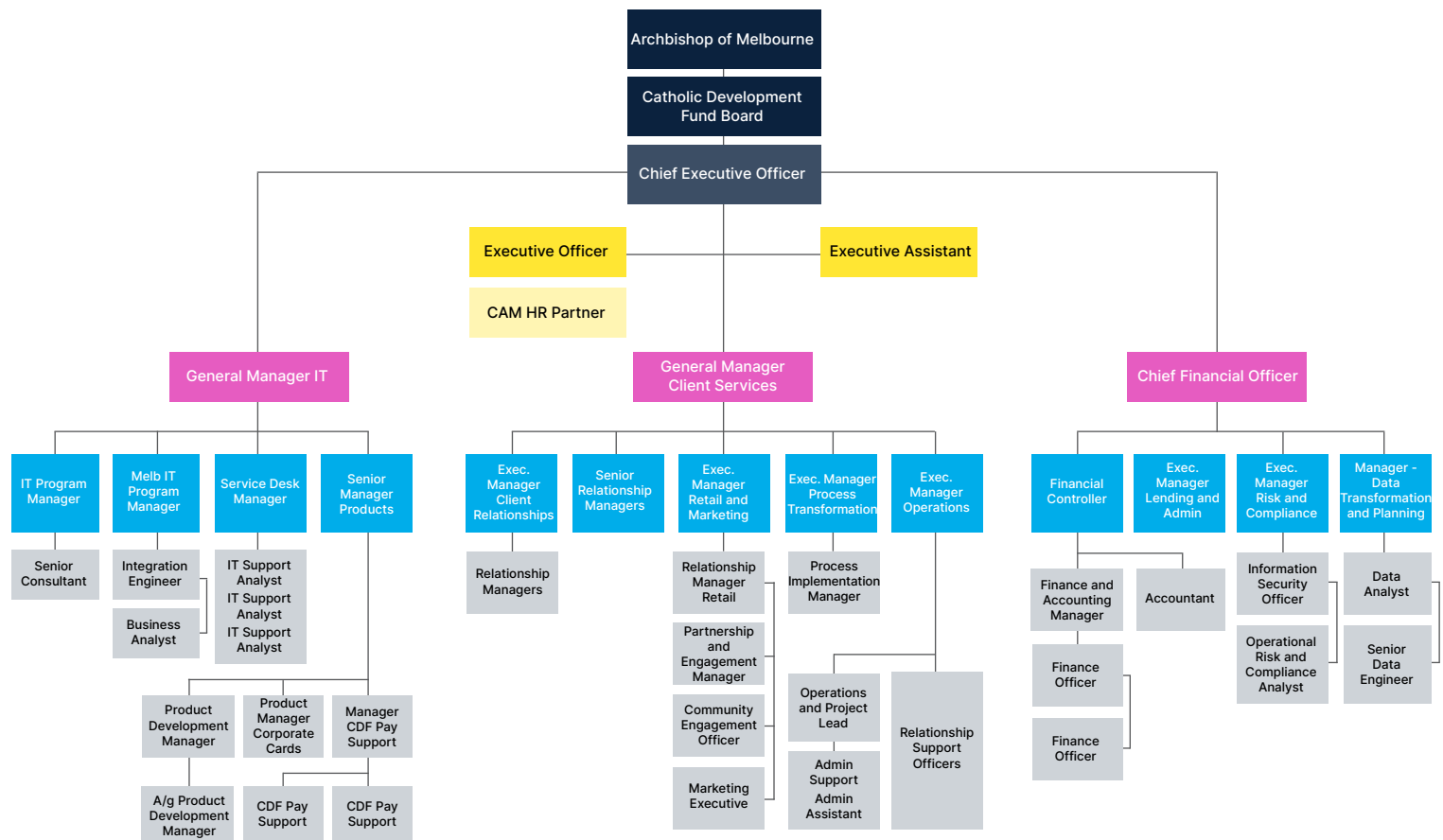


Figure 4: Organisational Structure of Catholic Development Fund (at 31 December 2024)



 Melbourne Archdiocese
Catholic Schools

 **MACseye**



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