



Modern Slavery Statement 2022





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Disclosure Note

This statement has been made on behalf of Little Company of Mary Healthcare Ltd. This Statement covers all entities owned or controlled by Little Company of Mary Healthcare Ltd. ABN 11 079 875 697.



About us

In 1885, six courageous Sisters sailed into Sydney to continue the mission of Venerable Mary Potter and the Sisters of the Little Company of Mary to care for those in need. Thus began Calvary's enduring legacy of care in Australia. Today, we continue their mission, in our hospitals, home and virtual care services, retirement living and residential aged care homes across five states and two territories.

The Spirit of Calvary expresses how we care for each other, and our patients, residents and clients by 'Being for Others'.

- Everyone is welcome.
- You matter. We care about you.
- Your family, those who care for you, and the wider community we serve, matter.
- Your dignity guides and shapes the care we offer you.
- Your physical, emotional, spiritual, psychological and social needs are important to us.
- We will listen to you and to those who care for you.
- We will involve you in your care.
- We will deliver care tailored to your needs and goals.
- Your wellbeing inspires us to learn and improve.

Our Vision and Values

As a Catholic healthcare provider, our vision is to excel and to be recognised as a continuing source of healing, hope and nurturing to the people and communities we serve.

We bring the healing ministry of Jesus to those who are sick, dying and in need through "Being for Others":

- in the Spirit of Mary standing by her Son on Calvary
- through the provision of quality, responsive and compassionate health, community and aged care services
- based on Gospel values, and
- in celebration of the rich heritage and story of the Sisters of the Little Company of Mary.

Our Values are visible in how we act and treat each other. We are stewards of the rich heritage of care and compassion of the Little Company of Mary. We are guided by the values of Hospitality, Healing, Stewardship, and Respect.

Modern Slavery: Our Approach

Our approach to modern slavery is grounded in our understanding of human dignity, in our understanding of the value of human work, of justice, and the respect of human rights. The Church teaches us of the sanctity of human life, that each person is precious, and that we all have a responsibility to fight against the violation and degradation of our brothers and sisters. We believe that modern slavery rejects this principle, and shows instead a contempt for human beings. For this reason, elimination of this scourge is a present concern of the Catholic Church, and therefore of Calvary.

Consistent with our values of hospitality, healing, stewardship and respect, Calvary is committed to upholding human rights, not only with respect to its own employees and the people we engage with daily, but also for the workers in our operations and supply chain. We believe our responsibilities as a Catholic, charitable organisation focussed on delivering the best possible care, extend to victims of modern slavery who may exist in our supply chains and operations.

This approach is enforced by our Ethical Sourcing Policy, Code of Business Practice, and our Business Partner's Criteria, which extends throughout the business to staff and suppliers.

2022 in Review

In fighting the scourge of modern slavery, we believe that the business community needs to continually review and improve on our response to changing environments. Our 2021 gap analysis identified areas where our approach had seen significant improvement in our ability to identify risks and equip staff with the tools required to address these risks on the ground. We also identified areas of improvement and opportunities for growth, particularly in our ability to communicate with suppliers who support the entire Calvary network. As a result, we are investigating the use of technology and automation in our systems, along with our third party provider of supply chain transparency solutions: Sedex.

Calvary's modern slavery risk management initiatives are split into three broad categories:

- risk identification and mitigation in our internal operations and supply chain
- staff awareness through education and training
- demonstrating our commitment through internal policies and procedures

In 2022, we continued to work with our suppliers, hosting information sessions and ensuring compliance of new and renewed contracted suppliers to Calvary's ethical business practices. We also identified an opportunity to improve on data collection so as to develop our ability to monitor compliance.

We built on the capability of our staff, requiring more staff to complete our online modules, and hosting training and information sessions for procurement staff throughout the Calvary network.

We launched a review of our internal policies and procedures, which strengthened our contracts, primarily with recruitment companies, in response to a significant risk presented in the use of third party workforce. In 2023, we are aiming to complete this review and update our policies to a stronger and more simplified form.

Our Plans for 2023

Across 2022, we have been building our automation capabilities to offer much stronger tracking and data in 2023. Actions include:

- continuation of our long-term road map, to strengthen our risk management of our supply chains.
- planning to substantially increase our ability to survey suppliers through automation, allowing us to build a much stronger picture of our risk.
- expanding our program with a greater number of our suppliers who operate in high risk sectors, and bring in new suppliers in Sedex.
- continuing with the development of a whistle-blower hotline for workers, contractors, and sub-contractors.
- building our staff awareness initiative, through additional training and materials, particularly on grievance mechanisms and remedy pathways.
- continuously reviewing the effectiveness of our actions in addressing the risk of modern slavery.

Our Plans Beyond 2023

Beyond 2023, Calvary will:

- continuously improve our due diligence in modern slavery risk management, encouraging our supply base to improve their risk management programs.
- conduct random audits of high risk suppliers.
- expand our supply chain mapping and update our risk profile, expanding our modern slavery program accordingly.
- roll out our governance and process into an online supplier platform to capture more suppliers in our risk mitigation.
- monitor and report on adherence to our ethical sourcing policy and documents.

Statement from Martin Bowles, National CEO, Little Company of Mary Health Care



Martin Bowles, National CEO, Little Company of Mary Health Care

I am proud to present Calvary's third Modern Slavery Statement, in line with the *Modern Slavery Act 2018*, which outlines the steps we have taken to identify and mitigate the risk of modern slavery in our supply chain and operations.

Throughout 2022, supply chain issues and workforce shortages continued to challenge us. These ongoing issues presented a significant risk to our organisation with reduced access to critical lifesaving products and services.

Product shortages often create new modern slavery and forced labour risks for our teams to predict and manage in line with our risk management framework. We have continued to develop and build on our approach to modern slavery with a number of initiatives introduced this year.

- Increased the number of staff trained in modern slavery risk management.
- Built on past year's Supplier Assessment Questionnaires, and remedial pathways for suppliers who do not meet our expectations.
- Increased our level of industry coordination through our membership with the Australian Catholic Anti-Slavery Network, and the Catholic Negotiation Alliance.

Our Mission is to bring the healing ministry of Jesus to those who are sick, dying and in need through "Being for Others". We maintain this year, as we have done in years prior, that this responsibility extends to the people who support us in our operations and supply chain. We cannot be an organisation dedicated to healing knowing the possible harm we are causing in doing so.

This Modern Slavery Statement has been approved and endorsed by The Little Company of Mary Health Care Limited (LCMHC) Board of Directors on 29 June 2023 and is for the period 1 January 2022 to 31 December 2022.

Martin Bowles
National CEO
Little Company of Mary Health Care Limited



Reporting Criteria 1 & 2: About Calvary

Our Organisational Structure

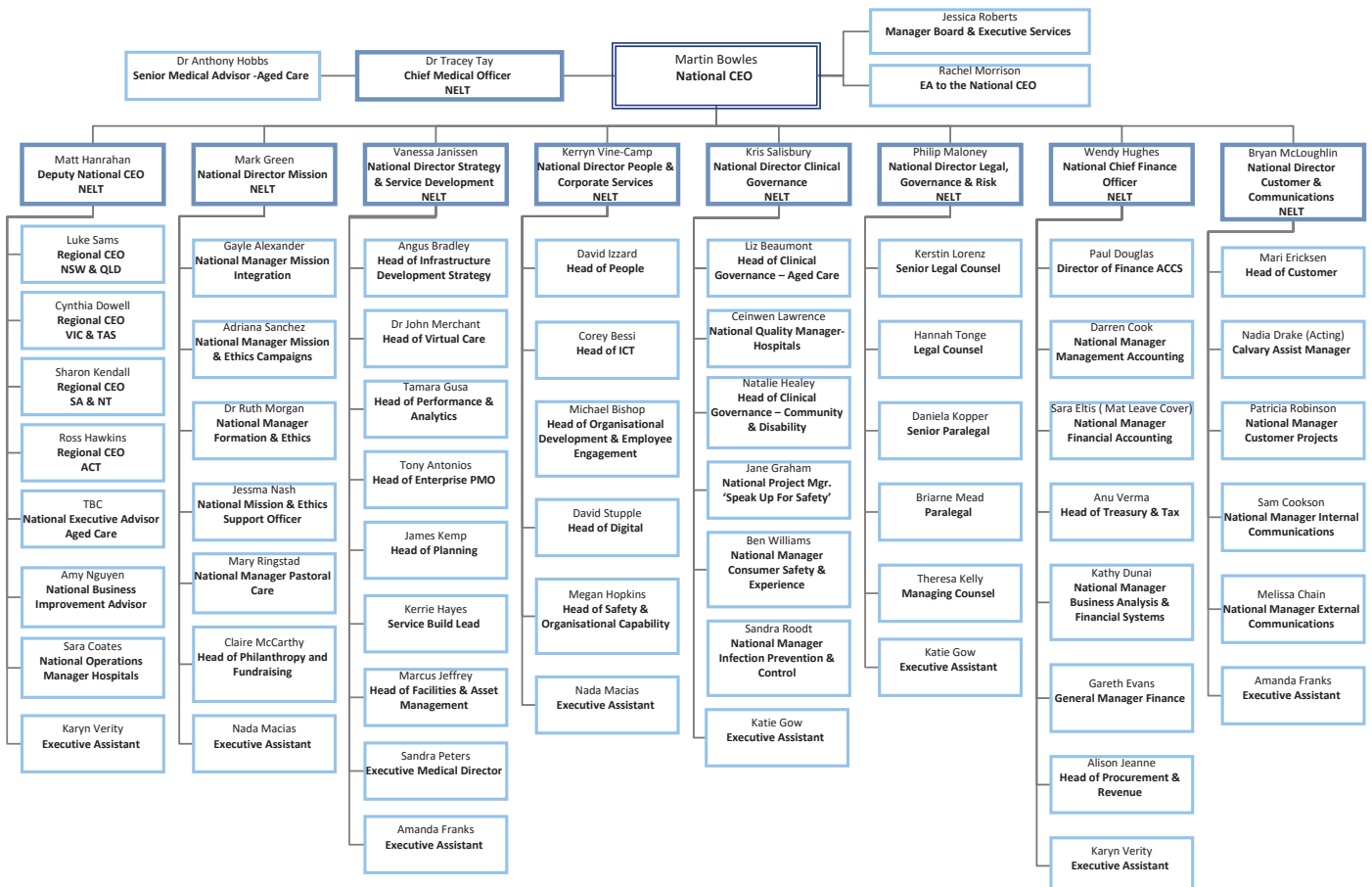
Little Company of Mary Health Care Limited and its subsidiaries (trading as Calvary) are charitable not-for-profit public companies limited by guarantee, registered under the Corporations Act 2001.

Calvary's Board of Directors is chaired by Jim Birch AM. Calvary Ministries exercises a stewardship role over the health, aged and home care programs and services conducted by LCMHC and its subsidiaries, to improve the health and wellbeing of the communities they serve. Details of Calvary Ministries and our Board of Directors can be found in our Annual Report.

Our National Executive Leadership Team, under National CEO, Martin Bowles AO PSM, oversees Calvary's strategic intent, and delivers on Calvary's mission of Hospitality, Healing, Stewardship and Respect.

Calvary operates as a parent company of LCMHC Limited, with hospitals, home and virtual care services, retirement living and residential aged care as controlled entities.

ORGANISATIONAL CHART – NATIONAL EXECUTIVE LEADERSHIP TEAM (NELT)



Our Governance Framework

As a provider of healthcare to the Australian community, Calvary operates under a strong corporate governance framework, underpinned by our mission and values. During the 2022 reporting period, Calvary's modern slavery initiatives were overseen by the National Director of People and Corporate Services, and the National Director of Mission, reporting to the LCMHC Board, through the National Executive Leadership Committee. Under their guidance the team ensures that skills and resources can be accessed throughout the business, such as Human Resources, Procurement, Legal, and Training and Development teams.

In 2018, Calvary established a modern slavery steering committee, with representation strategically selected from a cross-section of business units who were well positioned to enable rapid changes to policy, process, and mandated activities. The steering committee developed non-negotiable criteria for business partners, which were approved by the Board in 2018.

During the 2022 reporting period, Calvary's modern slavery initiatives were supported by the People, Values, Communications, and Culture Committee (PVCCC), with regular communications being produced for this group. The PVCCC advised on embedding Calvary's mission, vision and values into its strategic focus, leadership, and organisational behaviours, and took a special interest in advancing modern slavery and human rights issues within the Calvary business. In addition to this critical group, Calvary's Finance, Performance, and Risk Committee provided guidance and feedback to strengthen the governance process.



Our Operations

Calvary, as at end of 2022, operates 14 Public and Private Hospitals, 68 Retirement Living and Residential Aged Care Homes and a network of 19 Home care Centres around Australia. Calvary's head office is located at Level 12, 135 King Street, Sydney, NSW 2000. With a team of nearly 18,000 employees, in FY22 Calvary delivered care to more than 573,000 hospital outpatients, conducted 134,000 surgical procedures, provided home care services to 17,519 Home Care clients and provided more than 1.95 million hours of care to our residential aged care clients. In FY22, revenue from our operations was \$1,843,300,000.

Calvary has four public and 10 private hospitals providing acute and sub-acute care. Our hospitals cover a broad geographical region in Vic, Tas, SA, NSW, and ACT. Calvary Home Care has been supporting people in their own homes and communities for over 20 years in Vic, Tas, SA, NT, NSW, and ACT. We deliver a range of aged care, disability and other support services that enable independence, improve social connections and promote positive health and wellbeing. Calvary Residential Aged Care provides quality care and services within a supportive environment in which residents are respected for their individuality.

During the 2021 reporting period, Calvary purchased Japara, bringing an additional 55 aged care sites into our business. As of 2022, Calvary operates 68 aged care homes, retirement facilities and independent living units across Vic, Tas, SA, NSW, ACT and Qld.

In order to resource the many areas of our business, our direct supply chain consists of a range of large multi-nationals and small, local businesses, which provide our services with medical and surgical supplies, pharmaceuticals, energy, food and beverages, and ICT hardware and software.

A significant focus over the reporting period was the continued implementation of the "New Calvary" homes into the Calvary business. The additional homes were successfully implemented in 2021/22, with continued review and consolidation into supply chain and operations occurring during the reporting period.

Our Supply Chain

As a multi-faceted healthcare organisation operating across Australia, our supplier base is diverse, ranging from large multi-national organisations with highly diverse supply chains through to sole traders delivering site-specific services.

During the 2022 reporting period, Calvary transacted with 5442 suppliers.

We procure goods and services in the following primary spend categories.

INDIRECT	DIRECT
Recruitment and Agency	Drugs and Pharmaceutical Services
Professional Services	Clinical Services (e.g. Pathology, Allied Health)
Facilities Management	Major Medical Equipment
ICT	Medical and Surgical Supplies
Logistics	Prosthetics

Calvary’s expenditure on externally sourced goods and services in 2022 was more than \$925 million. This is managed by the National Procurement team over 160 core contracts.

In order to effectively manage security of supply, Calvary operates a “multi-region, multi-supplier sourcing strategy”. This strategy, in conjunction with the broad, and sensitive range of medical consumables required for our day-to-day operations, dictates that we engage with suppliers both locally and internationally. Manufacturing facilities for the goods used in our day-to-day operations are heavily concentrated in China, Europe, and the USA.





Reporting Criteria 3: Modern slavery risks in operations and supply chain

We believe that the importance of a modern slavery program extends beyond an organisation's legal accountabilities.

Ensuring that modern slavery does not exist in our supply chain or operations aligns with our core values and mission as a care-giving organisation.

Our efforts in 2022 continued to focus on fostering a transparent and collaborative relationship between us and our suppliers, educating our staff to understand and recognise the risks, and building systems and processes to allow for the reporting and escalation of any suspected or observed risks.

In the 2022 reporting period, Calvary extended our membership of the Australian Catholic Anti-Slavery Network (ACAN). We believe that combining our efforts with other like-minded organisations in our business sector will deliver the greatest impact in the shortest time.

Our supplier heat-map tracking and supply chain investigations that we conducted with ACAN have enabled us to identify key risks and areas of focus, develop an effective response and build plans for the future, which is contained in this report.



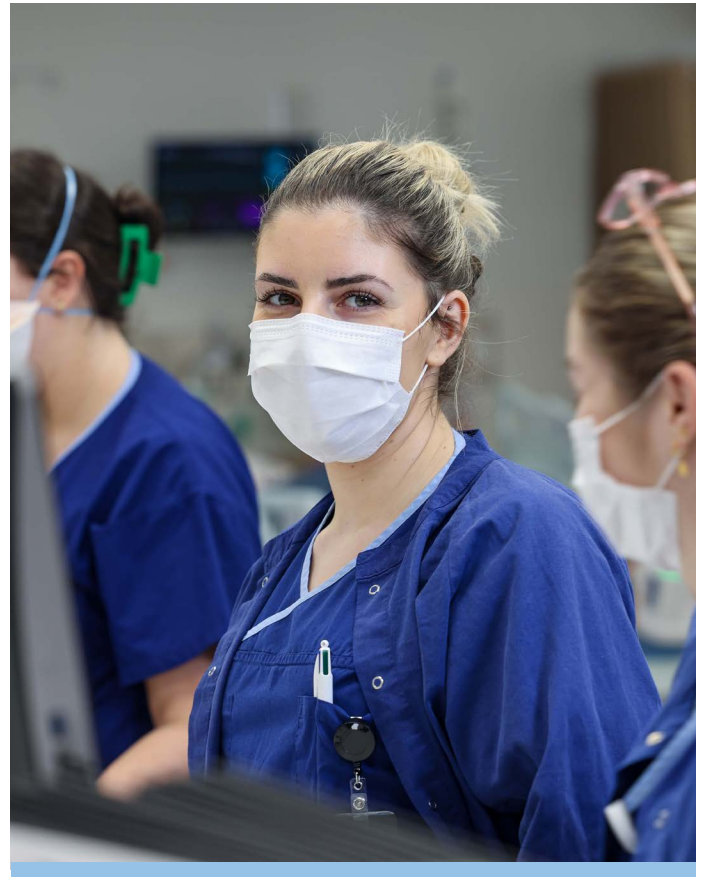
Operational Risks

Overview

Calvary provides a diverse range of services to patients, residents and other clients, where consumer and clinical choice is often a factor in procurement decision making. As a result, we recognise that the risk of modern slavery is something that occurs in our operations and supply chain. We work to proactively identify and mitigate these risks through a program outlined in this statement.

During the 2022 reporting period, the spectre of the COVID-19 pandemic continued to present challenges in supply chain security, extending beyond medical personal protective equipment, and impacting a more diverse array of categories. This brought new complexity to modern slavery risk management, however we maintained our process of review and approval of new suppliers and products, as defined in our COVID-19 pandemic management response. Through this process, we conducted additional due diligence into our suppliers to ensure each product met Calvary's strict clinical and safety requirements, and that the manufacture and supply chain of the product had robust mechanisms to mitigate the risk of modern slavery.

During the 2022 reporting period, workforce shortages and recruitment continued to be a challenge for many healthcare providers, considering the constraint on international travel, and our COVID-19 management plan. In order to meet workforce requirements, we engaged with third party labour companies, presenting an operational risk which required management.



Our People

Calvary takes pride in our commitment to be an equal employment opportunity provider, encourage workplace diversity and continue to promote equity, transparency, efficiency and a non-discriminatory approach to the recruitment, selection and appointment of staff.

Calvary employs most of our team directly, lowering the risk of modern slavery occurring within our workforce. However, we occasionally utilise third party labour hire.

As of December 2021, Calvary has 17,654 employees. Of our staff, 14,293 are female, making up approximately 80 per cent of our workforce.

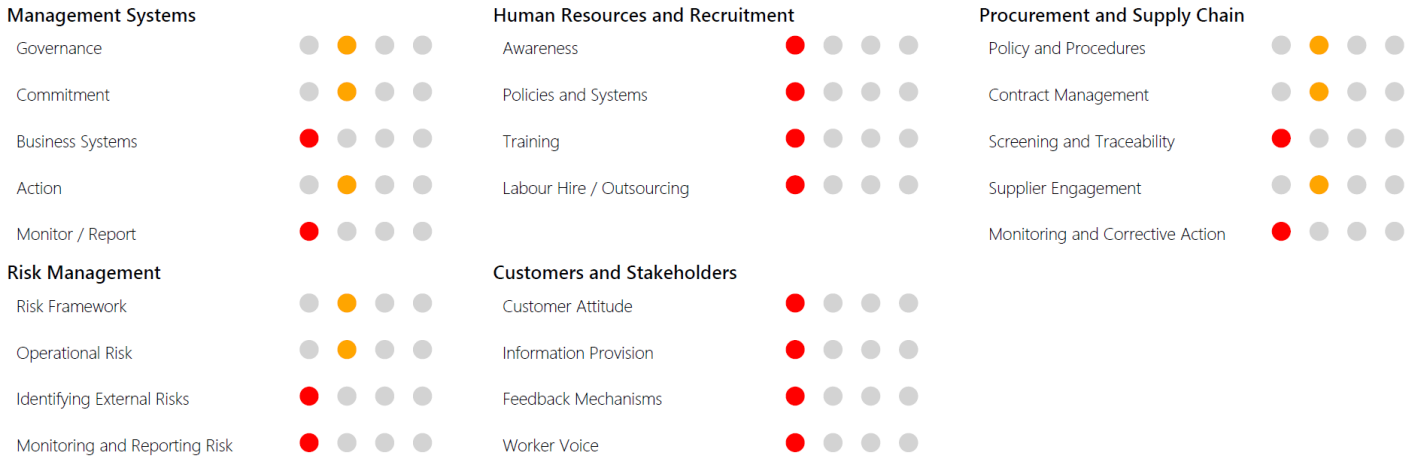
Calvary's recruitment and hiring policies are governed by our Recruitment, Selection and Appointment Procedure. This policy outlines responsibilities of hiring managers who are supported by a strong national and local Human Resources team.

Modern Slavery Gap Analysis

In 2019, Calvary, in partnership with ACAN, conducted a gap analysis on our own organisation and the wider Catholic community. Our gap analysis provided considerable insight into areas of improvement, which we endeavoured to rectify over the 2020 and 2021 reporting periods.

CALVARY'S 2019 HEAT MAP:

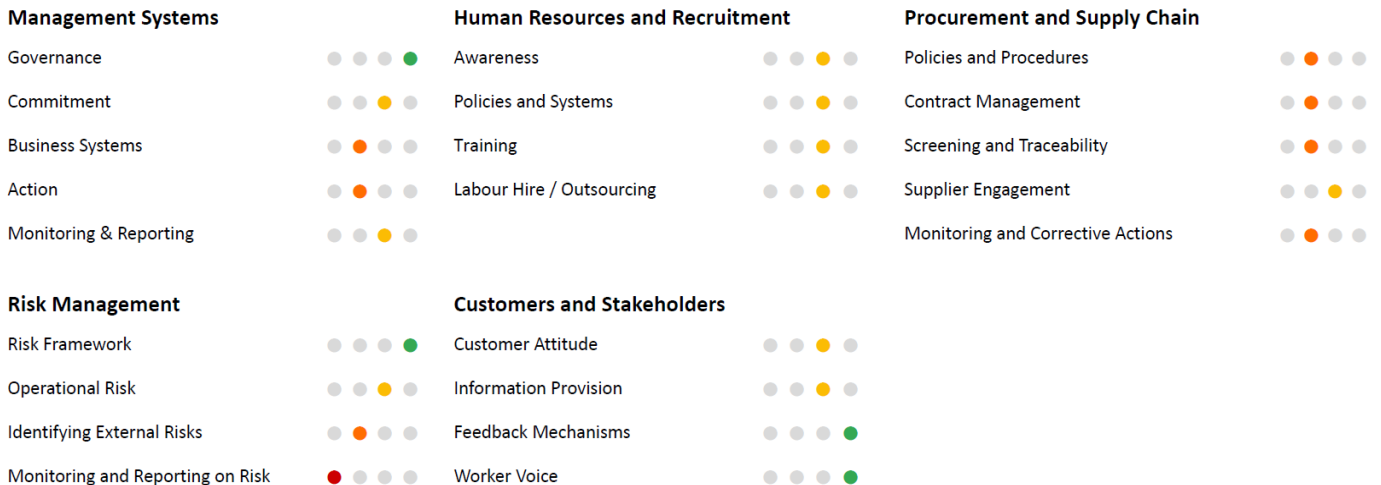
The heat map provides a snapshot of how you are currently tracking in your approach to managing modern slavery risks.



Utilising the insights from the gap analysis, Calvary established a cross-functional team, which is responsible for developing reforms and recommending Calvary's modern slavery program.

In 2021, we repeated the heat mapping exercise;

CALVARY'S 2021 HEAT MAP:



This data shows the effectiveness of actions taken between 2019 and 2021, particularly through:

- supplier communications
- internal reviews of our operations, and risk management within Calvary’s systems
- staff training requirements, and
- implementation of new internal feedback mechanisms and whistle-blower policy.

This data also identified key areas of improvement for future reporting periods:

- risk identification capabilities across third-tier supply chains
- integration of the modern slavery program into ‘New Calvary’ sites.

In 2022, we conducted further reviews into risk management capabilities, particularly relating to procurement and supply chain, following the identification of gaps in Calvary’s third-party supply chain data. This review was headed by National Procurement, and focussed on opportunities to improve the quality of supplier data transparency.

CHANGE ANALYSIS

Category	Topic	Result Previous Year	Result Current Year	Change
Management Systems	Governance	Orange	Green	▲
	Commitment	Orange	Yellow	▲
	Business Systems	Red	Orange	▲
	Action	Orange	Orange	-
	Monitoring & Reporting	Red	Yellow	▲
Risk Management	Risk Framework	Orange	Green	▲
	Operational Risk	Orange	Yellow	▲
	Identifying External Risks	Red	Orange	▲
	Monitoring and Reporting on Risk	Red	Red	-
Human Resources and Recruitment	Awareness	Red	Yellow	▲
	Policies and Systems	Red	Yellow	▲
	Training	Red	Yellow	▲
	Labour Hire / Outsourcing	Red	Yellow	▲
Customers and Stakeholders	Customer Attitude	Red	Yellow	▲
	Information Provision	Red	Yellow	▲
	Feedback Mechanisms	Red	Green	▲
	Worker Voice	Red	Green	▲
Procurement and Supply Chain	Policies and Procedures	Orange	Orange	-
	Contract Management	Orange	Orange	-
	Screening and Traceability	Red	Orange	▲
	Supplier Engagement	Orange	Yellow	▲
	Monitoring and Corrective Actions	Red	Orange	▲

Supply Chain Risks

In 2019 and 2020, Calvary, along with the ACAN, undertook a risk assessment on our supply chain. The risk analysis examined our top-50 suppliers by spend within high risk industries. Risk were assessed on the basis of the following indicators:

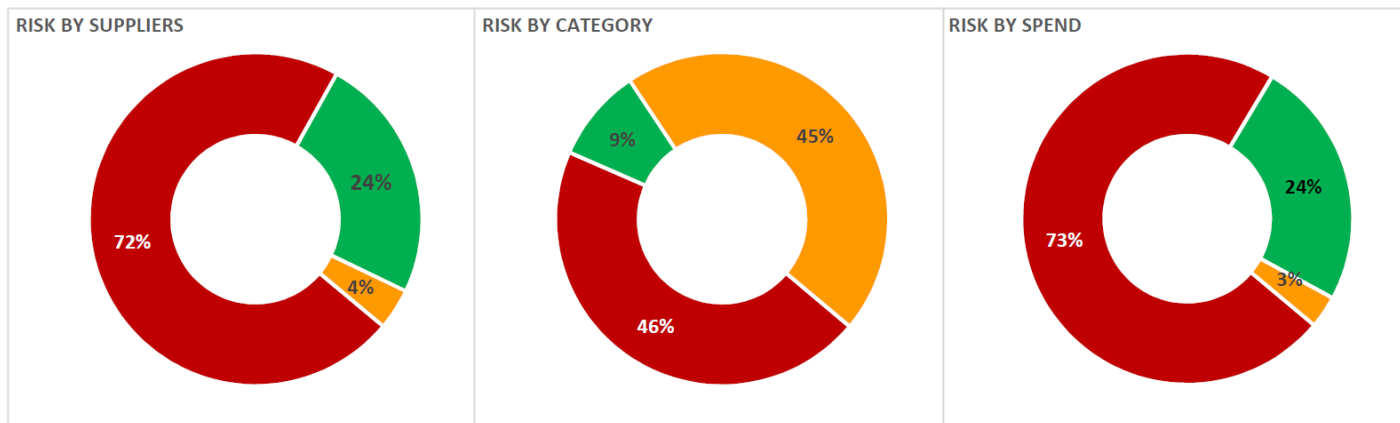
- **Industry sector** – Specific industry sectors deemed as high risk in international and national guidance documentation.
- **Commodity/product** – Specific products and commodities deemed as high risk by the US Department of Labor’s 2018 List of Goods Produced by Child and Forced Labor, the Global Slavery Index (GSI) and other international guidance materials.
- **Geographic location** – Based on estimated prevalence of modern slavery and the government responses as outlined in the 2018 GSI. While we predominantly use Australian suppliers, we recognise that our goods and services may come from countries other than those of the suppliers’ headquarters or registered place of business.

- **Workforce profile** – In undertaking our supplier analysis we considered the type of labour involved in the production of our goods and services, particularly where low-skilled, vulnerable or migrant labour is used, or where the work is deemed as ‘3D’ work (dirty, dull or dangerous).

Based on these indicators, we identified that over 70 per cent of potentially high risk spend is within five spend categories:

- Building and Construction
- Food and Beverage
- ICT Hardware
- Medical Supplies
- Waste Management.

NUMBER OF SUPPLIERS	HIGH RISK SUPPLIERS	SPEND CATEGORIES	HIGH RISK CATEGORIES	TOTAL SPEND (\$)	HIGH RISK SPEND
50	36	11	5	\$ 268,380,362	\$ 194,497,922



Our early focus was our high spend and high risk suppliers, and although this provided some helpful insight into our supplier capabilities, in 2021, we focussed on smaller key suppliers with a lower spend, and a similar risk profile. This approach identified suppliers who had fewer capabilities and lower levels of internal governance around modern slavery and human rights. This presented us with opportunities for supplier development and more meaningful remediation work.



Reporting Criteria 4: Actions taken to assess and address risk

Calvary's modern slavery risk management initiatives are split into three broad categories:

- risk identification and mitigation in our internal operations and supply chain
- staff awareness through education and training
- demonstrating our commitment through internal policies and procedures.

In October 2019, Calvary partnered with ACAN and worked collectively with the Catholic Negotiating Alliance (CNA). In 2022, we have continued with these affiliations to share knowledge and resources and develop a more encompassing process to identify and assess our high-risk suppliers and define how we can work collaboratively with them to address risks where they are identified.

Modern slavery action plan and road map

Increasing Awareness

- Calvary has continued to implement mandatory training for procurement staff and those involved in supplier relationship management. The Modern Slavery 101 module provides an overview of what is defined as modern slavery, who is at risk and where it is most likely to occur in our supply chains and operations. During this reporting period, this module was made available to all Calvary staff members, however it remains mandatory for all staff involved in procurement. Due to staff change overs, an additional 34 individuals completed the training, bringing the total number of completions to 201. This module has also been made available to all staff through our e-learning platform if they are interested in learning more about modern slavery.



- In 2020, we reported that a second module would be added during 2021. This module was finalised and testing completed in 2022. This module has since been rolled out.
- Throughout 2022, Calvary's modern slavery initiatives have been presented to various groups, including the PVCCC, site-based General Managers, and the extended procurement and supply teams. An extensive education session was delivered to all National Procurement staff members detailing our risk management approach, tools and guides for modern slavery risk mitigation, and the legislative environment.
- Calvary has maintained our electronic communications, which have been released to all staff from the National CEO. These communications outline the legislation, Calvary's approach to addressing modern slavery, along with links and a point of contact provided for further information including Calvary's Corporate and Social Responsibility page.

- **Supplier Engagement**
- Calvary has continued to communicate with all current suppliers on the steps we have and are undertaking to ensure we meet, and where possible exceed, our obligations with regards to modern slavery legislation.
- Calvary has notified all suppliers of our expectations of them as our partners to support our efforts in addressing this issue, including adhering to our Business Partner's Criteria and Ethical Procurement Policies and maintaining open and honest communications with us on this matter.
- Calvary joined Sedex via ACAN during the reporting period. Sedex is a data exchange platform, designed to enhance data sharing and minimise the burden of risk assessments and risk validation, by mutually recognising the results produced for specific shared suppliers, produced by other members' efforts, and vice-versa.
- Calvary invited high risk / high volume suppliers for on-boarding to the Sedex platform. Once invited to join the platform as a supplier of Calvary, the suppliers fill in a self-assessment questionnaire (SAQ), and a risk score is produced (site characteristics risk score).
- Moving forward Calvary plans to use Sedex 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
 - monitor and report on progress in the profile of suppliers.

CASE STUDY: SUPPLIER OF MEDICAL GLOVES

On 24 August, 2022, an article was published on *ABC* alleging that a supplier of medical gloves to Calvary, had knowingly profited from slave labour at one of its Malaysian suppliers. The article described how a Bangladeshi migrant worker, along with 12 other workers, were subjected to conditions that amounted to slavery, including having their identity papers taken, charged excessive recruitment fees to agents, physical punishment, long working hours, exposure to dangerous substances, and poor food and accommodation, among others. The US Customs and Border Protection found 10 out of 11 United Nations indicators of forced labour and slavery present at the supplier.

Needless to say, these significant accusations raised concerns with Calvary. As a member of ACAN, it was decided to engage the supplier in a unified approach. ACAN met with representatives from the supplier twice in 2022, 7 September and 8 December, with further meetings scheduled in 2023, the first of which was held on 21 February.

The engagement aims to foster collaboration with the supplier to enable progress and ultimately remove the risk of slavery in the supply chain. ACAN first sought to understand the baseline, including past actions and plans moving forward, and how ACAN could help drive progress in a direction that works for the victims, the supplier, and the entities participating in ACAN.

Discussions covered supplier compliance programs, capacity building, recruitment fees in migrant worker departure countries, wages, accommodation, grievance mechanisms, victim support, and consequences.

Among other issues and ideas discussed were regular update meetings, establishing a joint commission/working group to oversee progress, ACAN requesting an observer seat at the Responsible Glove Alliance meetings, invitations to attend some human rights due diligence/social audits on site, development of joint capacity building projects, and alternative sources for materials, production locations, and reshoring.

The engagement with the supplier is a positive step forward and a model for engagement with other suppliers, especially those who wish to be true partners.

Our People

- Calvary's third-party labour hire contracts have been updated to include modern slavery risk management requirements.
- During the 2022 reporting period, we reviewed our recruitment contracts in order to strengthen the modern slavery clauses and requirements. We updated multiple agreements with new clauses outlining Calvary's strict expectations on modern slavery risk management and reporting.

Our Policies and Contract Terms

- Calvary maintained our policies on modern slavery and ethical sourcing including:
 - Business Partner's Criteria
 - Ethical Sourcing Policy
 - Code of Business Practice
 - Declarable Minerals List.
- Calvary requires that all new contracted suppliers agree to our Business Partner's criteria to be considered as a supplier to Calvary.
- Modern slavery clauses have been included in Calvary's minor works and supply Contract templates which were revised during the 2021 reporting period, and used as our standard terms for minor works during 2022.

Sector collaboration

- Calvary is a member of the ACAN and has actively participated in joint activities with other Catholic organisations including the sharing of non-commercial information and analytics as part of a sector-wide response to modern slavery.
- Calvary is a member of the CNA and issued supplier self-assessments to our joint top-30 high risk suppliers.
- Calvary continues to work with other CNA members to address any identified risks.

Remediation

Calvary intends to provide appropriate and timely remedy to people impacted by modern slavery in accordance with the United Nations Guiding Principles on Business and Human Rights, the Australian *Modern Slavery Act 2018* (Cth) – 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 address future risks if Calvary is found to have caused or contributed to modern slavery. Due to the complexity of remediation, Calvary will need to source specialist resources that ensure the best outcomes for people impacted by modern slavery. To this end, Archbishop Fisher established 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.

Domus 8.7 Principles:

- independent advice and support
- ensuring people impacted are safe and protected
- any work undertaken is with the full knowledge and consent of people impacted
- human rights-based approach.

Domus 8.7 Overview:

- a vital service and key element of the ACAN Program
- addresses a key mandatory reporting requirement of the MSA
- provides the support needed for a rapid, coordinated response when victims are identified
- develops the internal capability to manage risk and engage staff
- establishes a documented process to manage complex humanitarian issues
- upholds Catholic Social Teaching
- ensures ongoing commitment to protecting the human rights of people in operations and supply chains.

Through Domus 8.7, Calvary 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 responses. It is the intention of Calvary to have any future grievances in relation to modern slavery mediated through Domus 8.7. Where Calvary is directly linked to modern slavery by a business relationship, Calvary is committed to working with the entity that caused the harm to ensure remediation and prevention of its recurrence.

Calvary 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.

Calvary has also developed a more detailed anti-slavery contract clause focusing on remediation obligations and expectations, for inclusion in contracts with high-risk suppliers. This clause imposes obligations on these suppliers to notify and consult Calvary to ensure victim-centred remediation processes are implemented to the satisfaction of Calvary.

In October 2021, the Taskforce successfully concluded the *Building Links* project, which was funded by a Department of Home Affairs Modern Slavery Grant. *Building Links* delivered modern slavery awareness-raising tools specific to the construction industry; and is a platform to access independent advice, support via safe conversations App *Whispli*.

When suspicions of modern slavery practices are notified through the whistle-blower service or other channels, Calvary 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.



Reporting Criteria 5: Effectiveness Assessment

We are continuously monitoring our progress against our commitments in 2022, as well as identifying new opportunities to improve our modern slavery program.

In 2022, we met all targets as detailed in this report including:

- continuation of a self-assessment survey to an increased number of suppliers, as well as remediation actions with suppliers who did not meet Calvary's modern slavery risk management expectations.
- identification of areas of improvement in the high risk areas of our supply chain and in conjunction with affected suppliers developing remediation plans.
- ongoing compulsory training for all staff involved in procurement and supply chain activities.
- reviewing, updating and developing policies and procedures to address modern slavery.

In 2023 and future years, we will be establishing milestones centred around:

- percentages of staff who have completed mandatory training
- number of audits conducted against suppliers, and
- number of supplier remediation programs completed.

CASE STUDY:

National Procurement provide information sessions for suppliers on our modern slavery risk management expectations, supplementary to those offered by ACAN. This was conducted with Supplier C, who claimed to have limited knowledge of the legislation, and was unaware of the requirements we had set. Supplier C is not a reporting entity, falling under the \$100 million threshold. As per our risk management methodology, we consider these vendor types to present a higher risk than reporting entities, as they rarely have the systems implemented to address modern slavery risks.

In February 2022, Supplier C had no known policy on modern slavery risk management.

Throughout 2022, Calvary's National Procurement conducted various reviews with Supplier C to remedy its shortfall. By the third quarter, Supplier C had a comprehensive policy, including mandatory training in modern slavery risk management, and has committed to voluntarily submit an annual modern slavery report to the Australian Government.

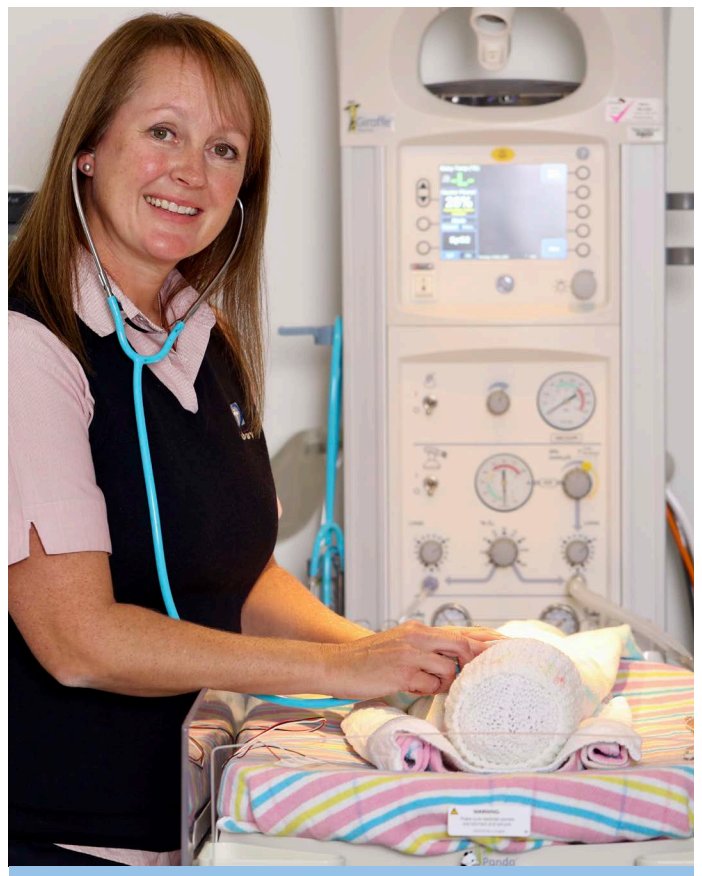
The remediation process for supplier C has demonstrated the effectiveness of our actions and supplier engagement program. It has also highlighted the importance of engagement with tier 2 and 3 suppliers, rather than top multi-nationals, which may have different risk profiles. Calvary National Procurement will continue to engage with our supplier base and ensure compliance to our standards.

Reporting Criteria 6: Process of consultation with entities owned or controlled

The Little Company of Mary Health Care Board is the single Board which governs all entities, owned and controlled.

Similarly the National Executive Leadership Team manages all entities, owned and controlled with the support of Regional CEOs to whom all owned and controlled service level executives report.

As the reporting entity, Calvary has developed policies, procedures and mandatory training and education materials for use by all Calvary entities. These were developed in consultation with all entities to ensure the highest level of adoption and compliance.



Reporting Criteria 7: Other

Since 2019, Calvary has been a member of the ACAN. Along with ACAN, we have contributed to a wider risk management process across multiple industries, including activities with the CNA.

We are continuing with our membership of ACAN next year, as addressing the risk of modern slavery involves long-term commitment.



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In 1885, six courageous Sisters sailed into Sydney to continue the mission of Venerable Mary Potter and the Sisters of the Little Company of Mary to care for those in need. Thus began Calvary's enduring legacy of care in Australia. Today, we continue their mission, in our hospitals, home and virtual care services, retirement living and residential aged care homes across five states and two territories.

To view our other locations visit
calvarycare.org.au/regions