

# CHL Response To Modern Slavery Policy

## Statement Of Position / Purpose

This policy is intended to identify, assess and address modern slavery risks in Catholic Healthcare's business and supply chains and ensure compliance with requirements under both State and Commonwealth modern slavery legislation.

## Policy Statement

Catholic Healthcare is a not-for-profit and compassionate organisation inspired by the Catholic faith and tradition which condemns all forms of slavery or slave-like practices. Catholic Healthcare recognises modern slavery practices as major violations of human rights and serious crimes. We are committed to eradicating these practices from Catholic Healthcare's business and supply chains. We are also committed to collaborating with key stakeholders and groups including the Archdiocese of Sydney to be part of a movement to respond to and eliminate modern slavery.

## Applicability

This Policy applies to all persons working for or on behalf of Catholic Healthcare in any capacity including, employees, seconded workers, volunteers, interns, directors, officers, agencies, contractors, consultants and any other third party representatives.

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# CHL Response To Modern Slavery Policy

## 1. Overview

Modern slavery practices are major violations of human rights and serious crimes. Modern slavery practices include: trafficking in persons, slavery, slavery-like practices (including forced labour and forced marriage) and child labour (including using children in hazardous work). Modern slavery practices also more broadly extend to practices which restrict a person's freedom and which often exist in the form of exploitation of a person or people for personal or commercial gain.

It is highly probable that Australian businesses are exposed to modern slavery risks and that Australian goods and services are tainted by modern slavery. This risk may be heightened for large companies and other entities with extensive, complex and/or global supply chains.

This Policy is aimed at targeting and eliminating modern slavery in Catholic Healthcare's business operations and supply chains. This is important as part of fulfilling Catholic Healthcare's mission, corporate social responsibilities and its reputation as leader in the aged care sector. It is also consistent with Catholic Healthcare's values.

Catholic Healthcare will:

- To the extent possible, engage and work closely with its suppliers to assess and address any modern slavery risks,
- respond appropriately to cases of modern slavery;
- collaborate with appropriate agencies to strengthen its response to modern slavery; and
- ensure that it will meet reporting and disclosure obligations under the modern slavery laws including the *Modern Slavery Act 2018* (Cth) and *Modern Slavery Act 2018* (NSW) and any other laws and regulations relating to the eradication of modern slavery as they come into effect (**Modern Slavery Laws**).

## 2. Holistic Approach to Modern Slavery

Catholic Healthcare recognises that modern slavery is not a stand-alone crime and will work to identify 'red flags' which alert the business to the possibility or likelihood of modern slavery practices occurring in its business operations and supply chains. These include questionable practices such as:

- use of overseas workers without proper documentation;
- non-compliance with workplace health and safety requirements;
- substantial underpayment of workers;
- financial fraud;
- bribery and corruption;
- child labour and exploitation; and
- discrimination, threats, abuse of power, undue influence, etc in the workplace.

## 3. Supply Chains (External)

The principle area in which Catholic Healthcare faces risks of modern slavery is its supply chains which include supplies of goods in high risk sectors and industries (especially where activities such as production and assembly are conducted overseas) and direct provision of labour through third party employees and recruitment agencies.

### Monitoring of Supply Chains

Catholic Healthcare will aim to identify 'red-flags', i.e. possibilities of Catholic Healthcare causing, contributing to or being directly linked to modern slavery practices within its supply chains through **standardised processes** for supply chain monitoring and identifying which parts of the supply chains are at risk. In doing so, Catholic Healthcare will, to the extent possible, have regard to sectors, types of products and services, countries and entities identified as potentially posing high modern slavery risks. Catholic Healthcare will also identify parts of the supply chains that are currently non-visible, and consider taking steps to improve visibility.

Monitoring supply chains are a continuous process, and should be implemented at the appropriate stages of the life cycle if the engagement with our suppliers. This is discussed further below.

### Transitional stage

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Catholic Healthcare will:

- Either directly or indirectly through the auspices of trusted sources, collect, consolidate and analyse relevant data relating to the potential modern slavery risks posed by existing suppliers. This data will be of a type that will assist Catholic Healthcare to assess modern slavery risks, including:
  - the type and nature of the sectors or industries;
  - product and services;
  - geography;
  - work force demographics, union representation;
  - financial data, e.g. consolidated revenue,
  - contractor compliance, and
  - supply chain data and maps.
- Based on the collected data, Catholic Healthcare will identify any suppliers at risk, and implement appropriate actions to address modern slavery risks for Catholic Healthcare. This will form the major part of Catholic Healthcare's response to modern slavery risks in compliance with its obligations under the Modern Slavery Laws.

### Pre-engagement stage

Catholic Healthcare will in the case of new contracts:

- implement **due diligence procedures** prior to engagement of suppliers e.g. require evidence that suppliers meet the requirements of Modern Slavery Laws;
- give preference to prospective suppliers demonstrating that they have:
  - complied with Modern Slavery Laws;
  - measures in place to ensure that modern slavery is not occurring in their businesses including their own supply chains, and
  - modern slavery or another related accreditation (if any),
- set expectations that the standard modern slavery clauses within CHL company standard contracts are non-negotiable, and that a breach of these clauses will trigger termination rights if the contractor leads Catholic Healthcare to breach its Modern Slavery Law requirements;
- require disclosures of all subcontractors used by its supplier businesses,
- to the extent possible, limit the use of subcontracts, or, if the use of subcontractors is unavoidable, impose obligations on the principal contractor requiring the principal contractor to undertake modern slavery due diligence in relation to its subcontractors and to mirror CHL modern slavery clauses in its contractors with subcontractors.

### Life-cycle

Catholic Healthcare will:

- use Key Performance Indicators to ensure ongoing compliance with Modern Slavery Laws,
- carry out (either itself or engage independent auditors) auditing (desktop and/or on-site) including;
  - access to data rooms containing prescribed documents;
  - scheduled site inspections;
  - interviewing workers;
  - ensuring full disclosure of any audits conducted by third parties including any outcomes,
- exercising zero tolerance on breaches of Modern Slavery Laws, and

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- invoke contractual rights to terminate, suspend, remediate contractual breaches of CHL's modern slavery clauses, depending on the severity of the breach or non-compliance.

### 4. Business Operations (Internal)

Catholic Healthcare will aim to identify 'red-flags' of modern slavery risks within its own internal business operations and practices, and hold officers accountable in relation to their respective roles in the prevention, detection and reporting of modern slavery risks.

#### Reporting and Whistleblowing

- Catholic Healthcare recognises that officers are responsible for detecting, reporting and preventing modern slavery, and is aware of the importance of creating an 'anti-slavery' culture within Catholic Healthcare.
- Catholic Healthcare has a whistleblower policy which establishes a reporting and investigation framework into misconduct including serious breaches of the law. Catholic Healthcare currently engages a third-party to provide whistleblowing services to allow employees to report their concerns anonymously without fear of reprisal. Should the third-party service cease, Catholic Healthcare will provide other avenues for staff to make their concerns about modern slavery risks in the supply chain known.

#### Training Internal Staff

- Management is responsible to ensure that staff are aware of this policy, what constitutes modern slavery and how each worker can contribute to ensure such practices are eliminated. This includes by building the capacity of Catholic Healthcare's procurement officers to identify and respond to modern slavery risks in the Catholic Healthcare supply chain.

#### Breaches of This Policy

Breach of this policy by an employee, director or officer of Catholic Healthcare may lead to disciplinary action being taken in accordance with the Catholic Healthcare's disciplinary procedure. Serious breaches may be regarded as gross misconduct and can lead to maximum consequences.

All employees will be expected to co-operate fully in any investigation into suspected breaches of this Policy or any related processes or procedures.

If any part of this policy is unclear, clarification should be sought from the Legal Team.

### 5. Compliance By Third Parties

Catholic Healthcare's procurement contracts and other relevant documents e.g. tender documentation should draw the supplier's attention to this Policy, the need for compliance with it and the consequences of non-compliance.

### 6. Collaboration

Catholic Healthcare will collaborate with the Archdiocese of Sydney and other Catholic entities in considering how to respond to modern slavery risks in the Catholic Supply chains.

### 7. Modern Slavery Statement

Under Modern Slavery Laws, Catholic Healthcare is required to publish an annual Modern Slavery Statement. Catholic Healthcare has published Modern Slavery Statements annually since the first Statement was published in 2021. The contents of the Modern Slavery Statement are set out in the Modern Slavery Laws. To date, Catholic Healthcare has worked in conjunction with the Archdiocese of Sydney in the development and publication of its Modern Slavery Statement.

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The form and contents of the statement may be different under Commonwealth and relevant State laws (to the extent applicable), however are expected to include details:

- identifying Catholic Healthcare as a reporting organisation,
- describing the structure, operations and supply chains of Catholic Healthcare,
- describing the risks of modern slavery practices in the operations and supply chains of Catholic Healthcare, and any entities that Catholic Healthcare owns or controls,
- describing the actions taken by Catholic Healthcare and any entity that Catholic Healthcare owns or controls, to assess and address those risks, including due diligence and remediation processes, training about modern slavery available to employees, etc,
- describing how the reporting entity assesses the effectiveness of such actions,
- describing the process of consultation with any entities that Catholic Healthcare owns or controls, and
- including any other information Catholic Healthcare considers relevant.
- Providing such other information as may be required from time to time.

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### Review History

Ver 1 (1 July 2019)

Ver 2 (12 Mar 2024) update review date and add links to related documents

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### Reference & Related Documents

Catholic Healthcare's Mission and Values [our-mission-and-values.pdf \(catholichealthcare.com.au\)](#)

The Annual CHL Modern Slavery Statement [chl\\_modern-slavery-statement\\_2022-2023.pdf \(catholichealthcare.com.au\)](#)

Whistle Blower Policy: [Resource Centre - People - Speak Up - Policy - All Documents \(sharepoint.com\)](#)

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### Key words for search

Modern Slavery, Eradication, Risks, Supply Chains, Business Operations,

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