



St Vincent de Paul Society
NSW
good works



MODERN SLAVERY STATEMENT 2021

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Disclosure Note

This statement has been made on behalf of St Vincent de Paul Society NSW (ABN 91 161 127 340) and the Trustees of the Society of St Vincent de Paul (NSW) (ABN 46 472 591 335) and St Vincent de Paul Housing (ABN 41 158 167 483).

This Statement does not apply to the St Vincent de Paul Society entities outside of NSW.

Registered Office 2C West Street, Lewisham NSW 2049

Reporting period: 1 January 2021 – 31 December 2021



ACKNOWLEDGEMENT OF COUNTRY

We acknowledge Aboriginal and Torres Strait Islander peoples, as the Traditional Custodians of this land, with deep respect. May Elders, past and present, be blessed and honoured. May we join together and build a future based on compassion, justice, hope, faith and reconciliation.



FOREWORD

The Trustees of the Society of St Vincent de Paul (NSW), the St Vincent de Paul Society NSW and St Vincent de Paul Housing aspire to an Australia transformed by compassion and built on justice. Our members, volunteers and employees work daily to bring about that transformation and advocate for greater justice on a range of social issues including Modern Slavery.

The *Modern Slavery Act 2018 (Cth)* describes Modern Slavery as eight types of serious exploitation including trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage and the worst form of child labour. It includes situations where threats or deception are used to exploit victims and undermine or deprive them of their freedom.

Modern Slavery is a challenge to justice in the world and it is contrary to our values. We are committed to the identification of Modern Slavery in our supply chain and taking action to eliminate it. We are also raising awareness across our organisation and with our suppliers of the steps we are taking to source products and services ethically.

Approval And Signature

This joint statement was approved by the Trustees of the Society of St Vincent de Paul (NSW), the Board of St Vincent de Paul Society NSW, and the Board of St Vincent de Paul Housing.

Date of approval June 2022.

Paul Burton
President of Trustees
Society of St Vincent de Paul (NSW)

Richard Stewart
Chair of the Board
St Vincent de Paul Society NSW

Denis Walsh
Chair of the Board
St Vincent de Paul Housing

ABOUT US

The St Vincent de Paul Society was founded by a 20-year-old student named Frederic Ozanam in 1833. It was established by like-minded individuals who wished to put their faith into action.

This compassionate outlook, enthusiasm and vision continues today in Australia. There are thousands of people who every day share their time, care for humanity and energy to make a difference in the lives of disadvantaged people all around Australia.

The St Vincent de Paul Society NSW (SVDP NSW) was established in 1881 and currently has more than 13,000 members and volunteers, and 1,300 employees across the state.

We have a large geographic footprint across NSW, with 372 local member networks, referred to as Conferences, present in communities across NSW.

Our members, also known as Vincentians, volunteers and staff help people experiencing poverty and disadvantage with resources including food parcels and vouchers; financial assistance; help with energy bills and other debt; budget counselling; school items for children; and the provision of other material items such as furniture, clothing, bedding and any other household items. We also provide vital emotional support and referral services when they are needed.

We are a leading provider of social services, with 100 services across the state. Our services include homelessness and housing services; domestic and family violence services; disability services; mental health programs; and health services, including rehabilitation services.

SVDP NSW is committed to sustainability and recycling. Our network of Vinnies shops sell a range of pre-loved goods, the revenue from which we use to support people in need.

St Vincent de Paul Housing (SVDP Housing) partnered with the NSW Government to deliver new social and affordable housing. In this partnership, supported by the Social and Affordable Housing Fund, we build properties on our own land, which are then tenanted out by Amélie Housing who are contracted to provide day-to-day management of SVDP Housing. The Society provides ongoing social support for tenants, ensuring they not only have a home, but the wrap-around assistance they need to achieve stability.

OUR MISSION

The St Vincent de Paul Society is a lay Catholic organisation that aspires to live the gospel message by serving Christ in the poor with love, respect, justice, hope and joy, and by working to shape a more just and compassionate society.



OUR VISION

The Society aspires to be recognised as a caring Catholic charity offering “a hand up” to people in need. We do this by respecting their dignity, sharing our hope, and encouraging them to take control of their own destiny.

OUR ASPIRATION

An Australia transformed by compassion and built on justice. The Society advocates on several pressing social justice issues such as homelessness, poverty and people seeking asylum.

OUR KEY VALUES

- Commitment** – Loyalty in service to our mission, vision and values.
- Compassion** – Welcoming and serving all with understanding and without Judgement.
- Respect** – Service to all regardless of creed, ethnic or social background, health, gender or political opinions.
- Integrity** – promoting, maintaining and adhering to our mission, vision and values.
- Empathy** – Establishing relationships based on respect, trust, friendship and perception.
- Advocacy** – Working to transform the causes of poverty and challenging the causes of human injustice.
- Courage** – Encouraging spiritual growth, welcoming innovation and giving hope for the future.

IN THE 2020/21 FINANCIAL YEAR WE:



supported 3,595 people with disability to work towards their goals



assisted more than 13,852 people through homelessness and housing services



delivered 3,000 doses of COVID-19 vaccines in the space of 12 weeks at our immunisation hub in Sydney



helped 2,415 women and children experiencing domestic and family violence



served 9,073 meals through the Nagle Centre in Campbelltown



offered 1,335 people social inclusion and skills support through the Ozanam learning centre



provided flood appeal funding relief to 718 households



managed 502 social and affordable housing dwellings



provided assisted employment and access to recreation programs for 232 people with disability.

2021 MODERN SLAVERY RISK MANAGEMENT INITIATIVES

In the 2021 calendar year, in support of our Modern Slavery Risk Management, we:

- participated in the Australian Catholic Anti-Slavery Network (ACAN) year two Modern Slavery Risk Management Program
- increased awareness of Modern Slavery among our people through training, regular internal communications and engaging more closely with parts of the Society where our people may encounter those directly affected by Modern Slavery
- ensured relevant policies are compliant with Modern Slavery legislation
- engaged with suppliers to increase awareness of the risks of Modern Slavery, and our expectations of them to address those risks
- ensured that an evaluation of Modern Slavery risk is embedded into our new supplier selection process
- negotiated with new suppliers to ensure new contracts, where appropriate, include anti-Modern Slavery requirements
- commenced implementation of a risk assessment process across our suppliers
- commenced the identification and mapping of high-risk supply chains across the state
- commenced the implementation of mitigation strategies where the potential for Modern Slavery was identified members of the Modern Slavery working group participated in the webinar: How to make progress tackling Modern Slavery.

OUR PLANS FOR 2022

We will expand on our supplier engagement and proactively engage with new suppliers to ensure that our commitment to the elimination of Modern Slavery is understood by our partners.

We will:

- increase the awareness of Modern Slavery amongst our stakeholders through internal and external communications channels
- increase engagement with existing and new suppliers to increase awareness of Modern Slavery risk in their operations and supply chains and on-board them to SEDEX
- continue to progressively review and ensure anti-Modern Slavery terms are agreed in high-risk supplier contracts.



REPORTING CRITERIA 1&2

About St Vincent de Paul Society NSW

St Vincent de Paul Society in NSW is made up of three legal entities:

- **The Trustees of the Society of St Vincent de Paul (NSW)** (State Council) is a body corporate incorporated under the Roman Catholic Church Communities' Lands Act 1942 (NSW)
- **The St Vincent de Paul Society NSW (SVDP NSW)**, is a public company limited by guarantee
- **St Vincent de Paul Housing** is also a public company limited by guarantee.

The three legal entities are referred to as “the Society,” “we” or “us” throughout this document unless an individual entity is named specifically.

The three entities are a consolidated reporting group for the

purpose of annual reporting to the Australian Charities and Not-for-profits Commission.

St Vincent de Paul Society NSW annual revenue for the reporting period was \$212.1M.

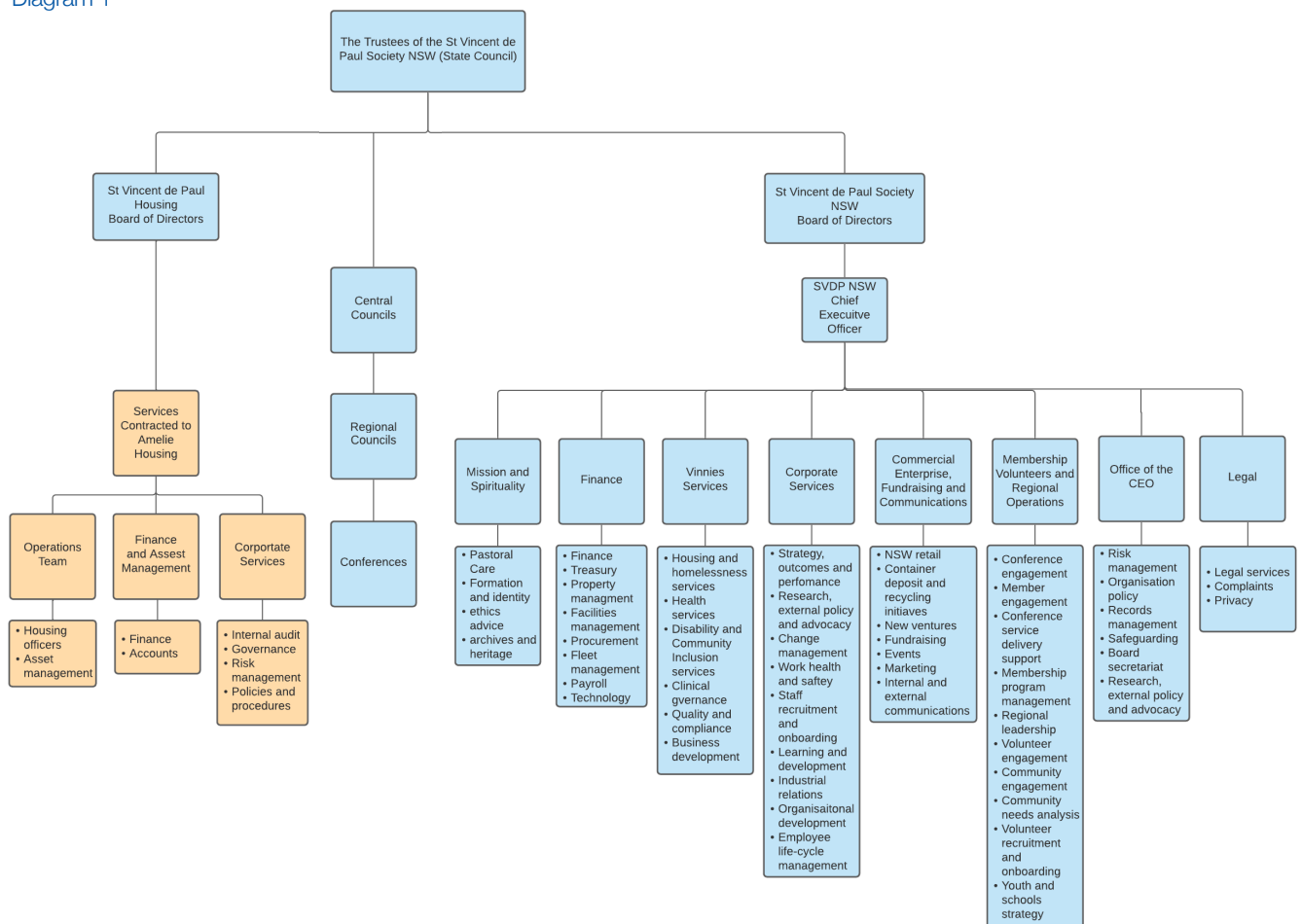
St Vincent de Paul Housing does not have employees and contracts Amélie Housing to run all day-to-day operations.

This Modern Slavery Statement does not apply to:

- the international body of the St Vincent de Paul Society, the International Consul General, or any entities owned or controlled by the International Consul General
- the National Council of St Vincent de Paul Society
- St Vincent de Paul Societies in other Australian states and territories, or any entities owned or controlled by these Societies.

Our organisational structure

Diagram 1



OUR GOVERNANCE FRAMEWORK

St Vincent de Paul Society NSW

The St Vincent de Paul Society NSW Board provides strategic oversight and direction for the activities of the Company, St Vincent de Paul Society NSW. The Board is supported by four advisory committees, including the Governance, Risk and Nominations Committee.

The Board of Directors of St Vincent de Paul Society NSW, through its Governance, Risk and Nominations Committee has oversight of the Modern Slavery Risk Management program. It is responsible for:

- overseeing the development of the Modern Slavery Statement
- overseeing of any identified risks and advising the Board on the mitigation of such risks
- providing regular (quarterly) updates to the Board, in accordance with the Risk Management Framework.

Responsibilities for implementing our Modern Slavery obligations are as follows:

- The Chief Financial Officer (CFO) has overall responsibility for the organisation's Procurement Policy and procedures and ensuring that the organisation's procurement practices have the necessary risk mitigation controls. The CFO chairs the cross-functional Modern Slavery working group which drives the Modern Slavery work in the Society in NSW
- The Director, Office of the CEO is responsible for organisational governance and ensuring that governance policies and procedures are current.
- The Director, Legal is responsible for organisational risk management and compliance, including in relation to Modern Slavery.
- All Executive Directors are responsible for ensuring their staff comply with the organisations policies and practices.

Policies relevant to Modern Slavery include:

SVDP NSW

- Modern Slavery Policy
- Procurement Policy including Supplier Engagement Principles
- Whistle-blower policy
- Feedback and Complaints Policy
- Risk Management Framework
- Code of Conduct

Trustees of the Society of St Vincent de Paul (NSW)

The Trustees are a body corporate under the *Roman Catholic Church Communities Lands Act 1942* (NSW). The Trustees are the members of the State Council. The Trustees currently own all the real property assets of SVDP NSW in NSW and do not have any employees. The Company, SVDP NSW operates the businesses and services, it also supports the Trustees of the Society of St Vincent de Paul (NSW) including in respect of its obligations under the Modern Slavery Act.



St Vincent de Paul Housing Board

St Vincent de Paul Housing is a special work of the Trustees of the Society of St Vincent de Paul (NSW). The Trustees of the Society of St Vincent de Paul (NSW) is the member of St Vincent de Paul Housing. St Vincent de Paul Housing does not have any employees. The St Vincent de Paul Housing Board is assisted, by its Governance Committee, to maintain compliance with corporate governance standards. The Board has responsibility for Modern Slavery oversight.

As Amélie Housing is contracted to run day-to-day operations, Amélie Housing's Chief Financial Officer and Operations Director have contractual responsibility for procurement in respect of St Vincent de Paul Housing.

Amélie Housing's National Corporate Services Director is responsible for organisational governance and ensuring that governance policies and procedures are current.

Policies relevant to Modern Slavery include:

- Procurement Contractor Policy
- Risk Management Policy
- Tenancy Complaints and Appeals Policy
- Whistleblower Policy

OUR OPERATIONS

We are an organisation whose focus is on serving the most disadvantaged, including people at risk of Modern Slavery. Services are delivered by our members, volunteers and staff. We also have contractual arrangements with third-party suppliers including agency staff and suppliers of goods and services.

OUR FOOTPRINT

We have a significant presence in NSW with operations across the State. Our members are arranged in five regions aligned with Catholic dioceses. Our staff and volunteers are organised into five regions: West, North West, North East, Metropolitan and South.

CONFERENCE WORK

Our members are the face of the Society in communities across NSW and work in Conferences, which are mostly connected to Catholic parishes. Conference members visit people in their homes, nursing homes and hospitals. Members connect with people where they live, providing practical assistance such as food and shopping vouchers, furniture and clothing, and helping with other living costs such as medical bills or back-to-school costs. Importantly, they accompany people through their times of hardship.

EMERGENCY RESPONSE

Our broad geographic reach across the State means we are well placed to respond quickly to natural disasters, such as floods and bushfires, and deliver emergency assistance.

VINNIES SERVICES

The people we assist are at the core of everything we do at the Society. Vinnies Services delivers our social services including homelessness and housing services; disability and community inclusion services; and health services, including drug and alcohol programs.

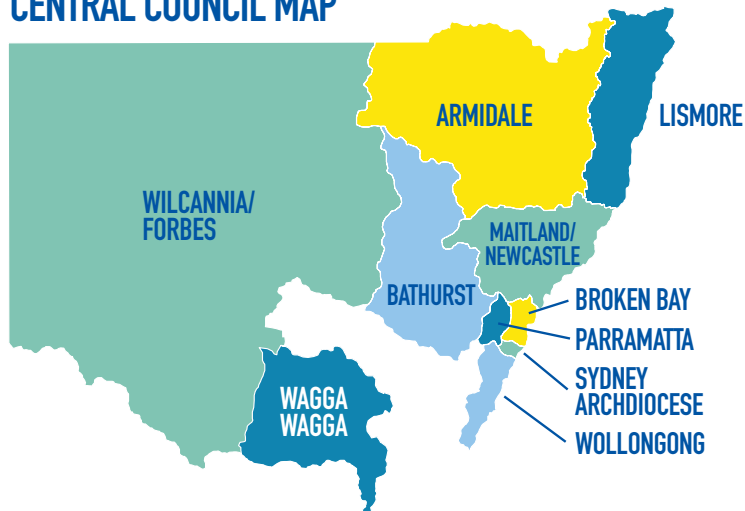
ADVOCACY

Through our advocacy work we promote policies and initiatives to lift people out of poverty and homelessness. We have well established partnerships with other organisations to achieve our joint objectives.

VINNIES SHOPS

Our Vinnies retail network includes 225 shops across NSW. Our shops primarily sell donated second-hand items including clothing, furniture, and bric-a-brac. Vinnies shops are much more than places to buy quality clothing at great prices. They are often co-located with or a conduit to the Society's Conferences or services, expanding the assistance we can deliver. Our shops are staffed with a combination of volunteers and staff. As well as offering value for money prices on a range of pre-loved goods, they also directly assist people experiencing disadvantage through the donation of furniture, clothing and household goods. Profits from the sale of goods go back to the community, going directly towards funding our services and programs.

CENTRAL COUNCIL MAP



WEST

Wilcannia-Forbes Diocese

NORTH WEST

Armidale Diocese
Bathurst Diocese

NORTH EAST

Lismore Diocese
Maitland/Newcastle Diocese

METROPOLITAN

Parramatta Diocese
Broken Bay Diocese
Sydney Diocese

SOUTH

Wollongong Diocese
Wagga Wagga Diocese

COMMERCIAL ENTERPRISE AND FUNDRAISING

We are a NSW Return and Earn Scheme collection partner for eligible containers. The Return and Earn Scheme in Dubbo is operated as a joint venture with the Regional Enterprise Development Institute (REDI.E), an Indigenous owned and managed organisation delivering employment, training and community services within the Murdi Paaki region.

Vinnies re/Cycle collection is an eco-friendly range of blankets, throws, rugs, and cushions made from recycled textiles and materials and sold in Vinnies shops.

SOCIAL AND AFFORDABLE HOUSING

As a provider of the NSW Government's Social and Affordable Housing Fund (SAHF), St Vincent de Paul Housing built 502 units for people on low to moderate incomes in November 2020. Of these, 357 are for social housing and 145 for affordable housing tenants. SAHF homes are new dwellings, built to the latest standards of design, safety, and accessibility. As part of the SAHF model we use a housing first approach which provides people with housing that is located close to local services and transport, as well as connecting them with wraparound support from staff so that they can achieve their individual goals.

OZANAM INDUSTRIES

Ozanam Industries is a Special Work of the St Vincent de Paul Society employing over 100 Australians with disability at our three Work Centres in Stanmore, West Ryde and Coonamble. Ozanam is registered with the National Disability Insurance Scheme (NDIS) to provide supports in employment.

92,650



the number of visits our members made to people's homes, hospitals, aged care facilities and prisons to offer support



35,289

total number of people assisted by our members



49% of people seeking assistance from our members was due to a shortage of food

1,259

people assisted to manage drug and alcohol addiction



1,228

people helped to secure permanent accommodation

\$2,200,000 allocated to Community Development Grants for people affected by the Black Summer bushfires



44 PROJECTS

by grassroots organisations benefiting from the first two rounds of Community Bushfire Grants

OUR SUPPLY CHAIN

We are continuing to mature the procurement function within the Society after transitioning from a distributed to a centre led approach. A significant undertaking is the establishment of a central register to facilitate the collection of supplier data, including key information relating to our agreements with suppliers, their services, supply chain and steps taken in relation to Modern Slavery risk.

The St Vincent de Paul Society NSW and St Vincent de Paul Housing procure the following types of goods and services:

- building and construction services
- cleaning and security services
- food and catering
- professional services
- ICT hardware/ICT software and network services
- facility management and property maintenance
- furniture, office supplies and other consumables
- skilled labour hire
- waste management services
- events and event management (fundraising agency, digital and creative services)
- linen, laundry and textile products
- motor vehicles and fleet management services

Due to the history of our organisation, and the nature of the support we provide to those in need across metropolitan, regional and remote NSW, the Society has a high volume and broad mix of suppliers with a low annual spend. With these suppliers, we acknowledge that a more supportive and educational approach is required. During 2021 we communicated with our suppliers in relation to Modern Slavery and our commitment to understand and address the risk of Modern Slavery in our supply chains.

In addition, our supplier engagement program focussed on higher risk procurement categories including facility management and property maintenance, cleaning and security, building and construction and waste management. In engaging with suppliers, our focus has been on increasing awareness of the Modern Slavery Act 2018 (Cth) and risks of Modern Slavery for business and understanding how our suppliers are addressing the risk of Modern Slavery in their operations and supply chains. Many of our suppliers have confirmed their awareness of the legislation and steps taken to address Modern Slavery included:

- Modern Slavery policy or statement
- supplier code of conduct
- ethical sourcing policy
- practices to reduce the risk of Modern Slavery
- a supply chain that included other entities required to report on Modern Slavery
- training on Modern Slavery for appropriate staff
- established grievance procedures including whistle-blower policies and hotlines
- certifications e.g., Chain of Custody; ISO 9001:2015
- membership of Suppliers Ethical Data Exchange (SEDEX) to assess supply chain transparency.

REPORTING CRITERIA 3

Modern Slavery risks in operations and supply chain

OPERATIONAL RISKS

Our central function is the provision of support and assistance to people in need by offering a hand up, rather than a handout. We comply with labour, employment, work health and safety and whistleblower laws.

Our policies and procedures are designed to provide protection to our people and other stakeholders. Based on our initial investigations during 2020, we consider our operations do not cause or contribute to Modern Slavery.

Our COVID-19 Response

COVID forced the Society to change the way it delivered services to meet the needs of our community. Many of those we assisted, we have come to know over time, but this past year we were also meeting many who were turning to us for help for the first time.

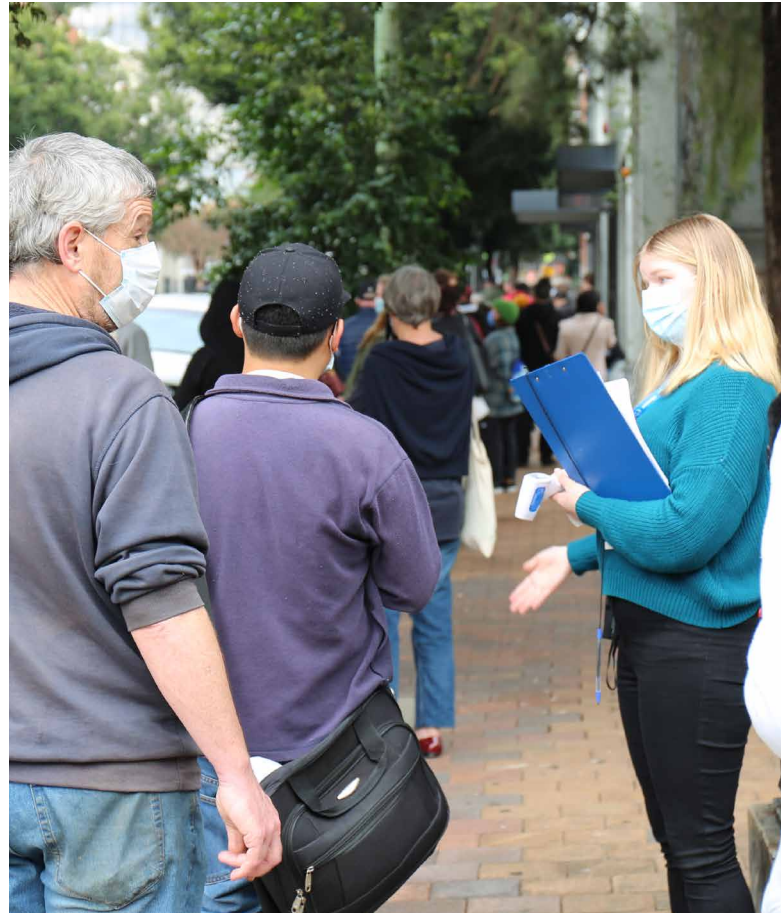
A great example of this has been the COVID -19 vaccination program that began at the Ozanam Learning Centre in May 2021. This program was in collaboration with St Vincent's Hospital, the City of Sydney, and the Kirketon Road Centre. Its impact was remarkable. The program provided more than 200 vaccinations each week to people experiencing various forms of disadvantage, and homelessness. Our health team created a COVID-safe space that could accommodate these significant numbers, an inspiring achievement.

In our services, ranging from homelessness and domestic violence to health and disability, our staff and volunteers were committed to finding ways to continue operations throughout the pandemic and deliver the help people needed.

Our members and conferences were also called upon to innovate to ensure they could keep providing support to those in need. Unfortunately, COVID put a stop to home visitations, so our members used phone calls and video chats to keep in touch with the people we assist. Dropping off food became a contactless affair to keep everyone safe. In cases where it was too difficult to provide food directly, vouchers were distributed to make sure the people we assist still had enough to eat.

Despite the pandemic and associated lockdown, Society members helped tens of thousands of people in the 2020/21 financial year. Like our services, our members do essential work and they continued to provide assistance to people who need it.

Building on lessons learned in the previous financial year, the Society has been working to enable members to pursue their



goals in a COVID-safe way This has involved ensuring they are supplied with alcohol hand sanitiser, personal protective equipment, COVID-safe guidelines, and regular updates on the latest from government and NSW Health.

The contactless drop-offs established in the last financial year were built upon throughout the 2020/21 financial year and more contact with people we assist was done digitally through video conferences and by telephone. Adapting to COVID-safe conditions has been an ongoing process and our members have proven themselves up to the challenge no matter how quickly the situation has changed.

COVID-19 continued to disrupt normal operations this year, with Vinnies Shops having to shut and volunteers being asked to work in back of house roles or temporarily standing down. With our services designated essential, our volunteers showed just how keen they are to help and enabled the Society to operate throughout the pandemic.

Our People

The St Vincent de Paul Society NSW is comprised of members, volunteers and employees. We have approximately 13,000 members and volunteers and 1,300 employees. The majority of members, volunteers and staff identify as female. Members and volunteers are predominantly over 60 years old. Young people may be involved through Youth Conferences.

Members and volunteers are integral to the Society's operations. Members provided support in the wake of the NSW floods and played a continuing important role in the distribution of black summer bushfire funding through the Community Grants scheme.

Our volunteers change lives every day through their work in Vinnies Shops and supporting the operation of our many services across the state, from food vans and community hubs to crisis accommodation centres for people escaping homelessness or domestic violence.

We safeguard our people from the risk of Modern Slavery by complying with relevant employment legislation. Most employees work under conditions of modern awards and have access to union membership. A small number of employees holding visas were employed in 2021. Visa status is noted during the recruitment process.

Our people are protected by the following policies:

- Code of Conduct
- Privacy Policy
- Safeguarding Children and Young People Policy
- Work Health and Safety Policy
- Conflict of Interest Policy
- Whistle-blower Policy

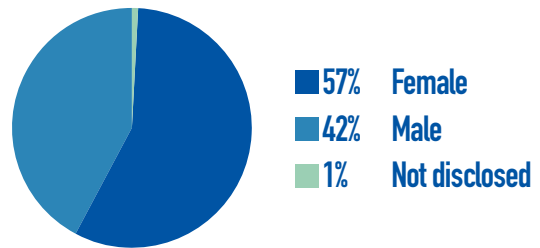
Our employment practices are governed by the following additional policies:

- Counselling and Disciplinary Policy
- Diversity and Inclusion Policy
- Flexible Work Policy
- Internal Grievance Policy
- Leave Policy
- Pandemic Leave Policy
- Respectful Workplace Policy

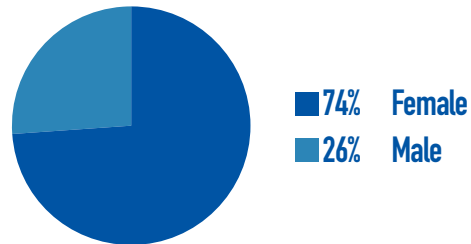
These policies and our commitment to ethical practices and ensuring the safety and well-being of our members, volunteers and staff give us confidence that our people are not at risk of Modern Slavery.

Agency staff may be engaged particularly where the Society is delivering health-related services. It is recognised that agency workers may be at a higher risk of experiencing Modern Slavery than employees engaged directly. We have ensured that agency staff are only engaged through companies that have a Modern Slavery Policy and other policies to promote a workplace in which employees are treated equitably.

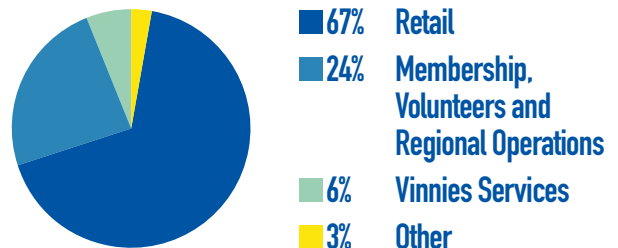
Member Gender



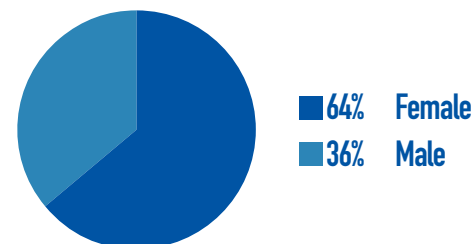
Volunteer Gender



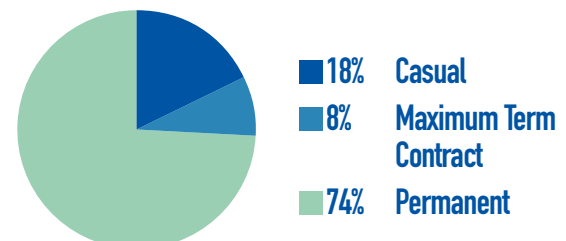
Where Volunteers Work



Employee Gender



Staff type of Employment



Modern Slavery Gap Analysis

In 2020, St Vincent de Paul NSW conducted an initial gap analysis which reflected that we were at the beginning of our work to identify and minimise the risks of Modern Slavery in our operations and supply chains. The Modern Slavery Risk Management Plan implemented in 2020/2021 has resulted in improvements in 20 of the 22 criteria assessed.

To achieve these improvements, we:

- increased engagement with our suppliers
- updated policies
- increased staff training on Modern Slavery. An introductory module is available to all employees and selected staff have access to courses supplied by the Australian Catholic Anti-Slavery Network (ACAN): Business Relevance, Implementing and Modern Slavery Risk Management Program and Grievance Mechanisms & Remedy

- Ensured our Executive Leadership Team completed our Modern Slavery training
- published 2020 Modern Slavery Statement to raise awareness, linked social media posts to anti-slavery day (UN)
- joined SEDEX platform for companies to manage and improve working conditions in global supply chains. SEDEX provides practical tools, services and a community network to help companies improve their responsible and sustainable business practices, and source responsibly.

Change Analysis

CATEGORY	TOPIC	RESULTS PREVIOUS YEAR	RESULT CURRENT YEAR	CHANGE
Management Systems	Governance	Red	Yellow	▲
	Commitment	Orange	Orange	—
	Business Systems	Red	Yellow	▲
	Action	Orange	Yellow	▲
	Monitoring and Reporting	Red	Yellow	▲
Risk Management	Risk Framework	Red	Yellow	▲
	Operational Risk	Orange	Yellow	▲
	Identifying External Risks	Orange	Orange	—
	Monitoring and Reporting on Risk	Red	Orange	▲
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	Green	▲
	Feedback Mechanisms	Red	Green	▲
	Worker Voice	Red	Green	▲
Procurement and Supply Chain	Policies and Procedures	Orange	Green	▲
	Contract Management	Red	Yellow	▲
	Screening and Traceability	Red	Orange	▲
	Supplier Engagement	Red	Yellow	▲
	Monitoring and Corrective Actions	Red	Orange	▲

Results – Gap Analysis for the 2021 Bridge the Gap Heat Map



SUPPLY CHAIN RISKS

During 2021 St Vincent de Paul Society NSW mapped our suppliers and analysed our supply chain for Modern Slavery risks, taking into consideration:

- **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 suppliers' headquarters.
- **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).

The graph illustrates the Modern Slavery risk ratings by our highest spend categories.

Of the 10 supplier categories that are our greatest spend food and catering, finance and investment, facility and property maintenance, cleaning and security, furniture and office supplies categories are considered high risk.

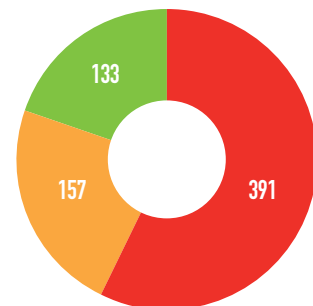
54% of the total spend analysed is considered high risk, and comprises more than 391 suppliers from 9 supplier categories:

- property and facility maintenance
- cleaning and security
- waste management
- furniture and office supplies
- food and catering
- property and facility maintenance
- finance and investment

A further 36% of our total spend is with 157 suppliers across 7 supplier categories which are considered to be medium risk.

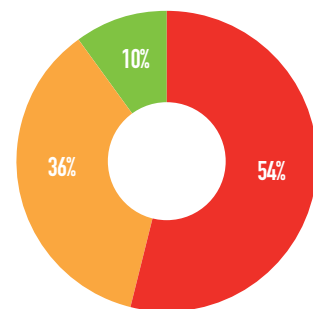
This is not a reflection of the practices of the individual suppliers, but rather an analysis based on industry sector, commodity/product, geographic location and workforce profile.

SUPPLIERS BY RISK CATEGORY



High risk Medium risk Low risk

RISK BY SPEND



High risk Medium risk Low risk



REPORTING CRITERIA 4

Actions taken to assess and address risk

In 2021, the Society:

Increased organisational awareness of our obligations under the Modern Slavery Act as we:

- participated in webinars and ACAN's monthly teleconference and leveraged their professional support and advice
- convened meetings of the cross-functional working group to assign accountabilities, drive awareness and new practices across the Society
- mapped our supply chain beyond the Greater Sydney Area. This included establishing a supplier register to record compliance data against suppliers as we engage with them
- trained staff who completed modules of the ACAN Modern Slavery courses, and invited all staff to complete training on a voluntary basis
- developed our supplier engagement strategy in relation to Modern Slavery
- established standard anti-Modern Slavery contract clauses for inclusion in all new supplier agreements and existing agreements as they fall due for renewal. The clauses require suppliers to have appropriate policies and procedures in place to assess and address risks of Modern Slavery in their operations and supply chains
- conducted a risk analysis of suppliers and identified those considered to be high-risk for initial engagement
- engaged with the select group of suppliers to gain information about their practices and their supply chain
- revisited and reassessed our gap-analysis to understand our progress and identify areas of activity which required greater attention
- ensured that our organisational policies continue to align with our obligations under the *Modern Slavery Act*.

We conducted a range of supplier engagement activities during 2021:

- we expanded our supplier engagement program to suppliers beyond the Greater Sydney Region
- we wrote to our suppliers to provide them with explanatory information about Modern Slavery, the legislation and our commitment to working with them to identify and address instances of Modern Slavery. We asked suppliers to confirm if they produce a Modern Slavery Statement, have a relevant policy in place and have a Supplier Code of Conduct
- our top 75 suppliers were invited to join Supplier Ethical Data Exchange (SEDEX) a membership organisation that provides an online platform, tools and services to help business operate responsibly and sustainably, protect workers and sources ethically
- in each Request for Proposal project that was undertaken we assessed Modern Slavery risk and ensured that all ensuing supplier agreements included anti-Modern Slavery clauses.
- we amended contractual terms with a number of our high and medium risk suppliers to include anti-Modern Slavery clauses. This work will continue through 2022



REMEDICATION

The Trustees, St Vincent de Paul Society NSW and St Vincent de Paul Housing are committed to ensuring we provide appropriate and timely remedy to people impacted by Modern Slavery in accordance with the United Nations Guiding Principles on Business and Human Rights and the Commonwealth Modern Slavery Act 2018 – Guidance for Reporting Entities and relevant Australian laws. This includes providing for, or cooperating in, actions to address harms to people and root causes to mitigate future risks if we are found to have caused or contributed to Modern Slavery.

Due to the complexity of remediation, the need for specialist resources and to ensure the most comprehensive and rights-compatible outcomes for people impacted by Modern Slavery, St Vincent de Paul Society NSW, is a founding partner of Domus 8.7 - an independent program to provide remedy to people impacted by Modern Slavery. The Society's remediation efforts will be enhanced in future through further policy development, detailed response procedures and engagement with Domus 8.7 and other civil society stakeholders. By partnering with Domus 8.7 the Society can help people impacted by Modern Slavery achieve meaningful outcomes that can be reported on and continuously improve risk management and our response.

Where we are directly linked to Modern Slavery by a business relationship, we are committed to working with the entity that caused the harm to ensure remediation and mitigation of its recurrence. We aim to include remediation obligations and expectations in contracts with high-risk suppliers who must notify and consult with us to ensure victim centred remediation processes are implemented to our satisfaction.

When indicators of Modern Slavery practises come to our attention through whistle-blower or other channels, staff will contact relevant law enforcement agencies or regulatory agencies and/or Domus 8.7 for an assessment, investigation, action planning and implementation of a remediation process.

We have funded a "Grievance Mechanisms and Remedy Pathways" module in our Modern Slavery E-Learning course that was made available to staff and other stakeholders in 2021.

- Review of our high and medium risk suppliers to understand their commitment and response to identifying and addressing Modern Slavery risks and practices was commenced. We identified 53% of our spend with high-risk suppliers, and 64% with medium risk suppliers (assessing suppliers with annual spend of \$10k or more) was with suppliers that have either
 - joined SEDEX,
 - produced a Modern Slavery Statement or
 - agreed to inclusion of anti-Modern Slavery terms in their supplier agreement with us.

In our engagements with suppliers, we noted an increased awareness and commitment to addressing the risk of Modern Slavery in their supply chains. It is becoming clear that the collaboration of customers and suppliers is gaining traction and momentum is building in the effort to identify and address the risk of Modern Slavery. Some smaller suppliers have requested more information, and we have provided the support with the assistance of ACAN. For example, we provided materials in Korean to a family owned and operated cleaning business.

REPORTING CRITERIA 5

Effectiveness assessment

Our Modern Slavery Action Plan will be reviewed twice a year by the Governance, Risk and Nominations Committee and by St Vincent de Paul Housing Governance Committee.

The Risk Management Framework has been updated to specifically address the risk of Modern Slavery.

INDICATORS/TARGET 2021	OUTCOME	
	PROGRESSING	ACHIEVED
Train key leaders on Modern Slavery Risk Management		✓
Include Modern Slavery clauses in our supplier agreement	✓	
Update our Risk Management Framework to include Modern Slavery		✓
Join Supplier Ethical Data Exchange (SEDEX)		✓
Increase supplier engagement on Modern Slavery by inviting suppliers to join SEDEX		✓

As we improve our risk and supplier management framework and business systems on an enterprise level, we will:

- be able to manage Modern Slavery risk more effectively
- continue to improve awareness of Modern Slavery with our Board, our people and suppliers
- continue to ensure Modern Slavery risk is actively considered when sourcing new suppliers, particularly in high-risk categories
- continue to collaborate with existing suppliers, focusing on those with higher risk, to incorporate Modern Slavery terms into their supply agreements and increase their understanding and commitment to addressing the risk of Modern Slavery in their operations and supply chains.

- Measures to assess effectiveness include:
 - the number of staff who have completed modern slavery training
 - the increase in Modern Slavery clauses in our supplier agreements
 - consideration of Modern Slavery in engagements with new suppliers and when renewing existing supplier relationships
 - suppliers who have joined SEDEX
 - increased evaluation of the risk of Modern Slavery when considering new initiatives

REPORTING CRITERIA 6

Process of consultation with entities owned or controlled

Members of the cross-functional working group responsible for the Modern Slavery risk management program include representatives from St Vincent de Paul NSW and St Vincent de Paul Housing. In 2021, the more regular meetings of the working group enabled an increase of momentum and allowed a more mature understanding of what Modern Slavery means in our operations. Awareness has increased and Modern Slavery is increasingly being considered in decision making and the assessment of new opportunities.

The entities work collaboratively to address Modern Slavery and have similar policies.

The Modern Slavery Statement was reviewed and approved by the cross-functional working group before presentation to the Trustees, Board of St Vincent de Paul NSW and Board of St Vincent de Paul Housing for approval and signature.

REPORTING CRITERIA 7

Other

St Vincent de Paul Society NSW is engaged in responding to Modern Slavery beyond the scope of the Commonwealth *Modern Slavery Act 2018*:

Our members support various programs to help developing countries within our region. This includes the Twinning Program which establishes close working relationships with St Vincent de Paul Societies in developing countries. Projects generally are under AUD 2,000 in value and are designed to build the capacity or provide assistance with earning an income of community members where the twinned conference operates.

Projects may include cow and goat banks, water systems, tailoring and other small livelihood programs. Projects may

also provide technical skills through education and training or support small enterprises in areas such as garment making, fishing, and food production through farming. The Assist a Student program helps disadvantaged primary, secondary or tertiary students in a partner country within the Asia Pacific region.

Twining and the Assist a Student Program help build capacity and resilience in developing countries and boost opportunity. These programs help to address the root causes of Modern Slavery and reduce vulnerabilities in the communities in which they operate.

APPENDIX

Procurement Policy Attachment G – Supplier Engagement Principles

Introduction

The St Vincent de Paul Society (the Society) was founded by a 20-year-old student named Frederic Ozanam in 1833. It was established by like-minded individuals who wished to put their faith into action.

This compassionate outlook, enthusiasm and vision continues today in Australia. There are thousands of people who every day share their time, care for humanity and energy to make a difference in the lives of disadvantaged people all around Australia.

Our Mission

The Society is a lay Catholic organisation that aspires to live the gospel message by serving Christ in the poor with love, respect, justice, hope and joy, and by working to shape a more just and compassionate society.

Our Vision

The Society aspires to be recognised as a caring Catholic charity offering “a hand up” to people in need. We do this by respecting their dignity, sharing our hope, and encouraging them to take control of their own destiny.

Our Aspiration

An Australia transformed by compassion and built on justice. The Society advocates on a number of pressing social justice issues such as homelessness, poverty and asylum seekers. To read more about the Society’s work in these areas and others please visit the Our Impact section of the St Vincent de Paul website at www.vinnies.org.au.

Business Ethics

We have always set high standards for the way in which we conduct business. We expect the same commitment from our suppliers. This is why we have established Supplier Engagement Principles (SEP). These principles speak to the commitments we make to those we serve. They establish the standards required for conducting business with the Society.

We will consider these principles in our selection of suppliers and will actively work with our suppliers to ensure compliance with these principles across the Supply Chain.

Human rights

Our suppliers shall respect internationally proclaimed human rights and shall avoid being complicit in human rights abuses of any kind. The Society’s suppliers shall respect the personal dignity, privacy and rights of each individual.

Forced Labour

The Society’s suppliers shall not use forced or involuntary labour, including, but not limited to, bonded or debt. The

supplier shall ensure that the work relationship between the worker and the supplier is freely chosen and free from threats.

The supplier shall ensure that all workers shall be free to leave their employment/work after giving reasonable notice. Workers shall not be required to lodge deposits of money, identity papers or similar in order to obtain or keep their employment/work.

Child Labour

The Society’s suppliers will not use child labour. The term “child” refers to any person employed under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest.

The Society supports the use of legitimate workplace apprenticeship programs which comply with all laws and regulations applicable to such apprenticeship programs.

Wages and Benefits

The Society suppliers shall provide remuneration that complies with any national legal standard of minimum wage. The basis on which workers are paid is to be clearly conveyed to them in a timely manner.

The supplier shall ensure all workers are provided with written agreements of employment setting out employment conditions in a language understandable to the worker.

Working Hours

The Society’s suppliers shall ensure that working hours are not excessive and comply with applicable local laws. The supplier shall respect the individual worker’s need for recovery and secure that all workers have the right to adequate leave from work with pay.

Non-discrimination

The Society’s suppliers shall not engage in direct or indirect negative discrimination in hiring and employment practices on grounds of race, colour, religion, political or other opinion, age, national or social origin, sexual orientation, gender, marital status, pregnancy, or disability, and shall promote equality of opportunity or treatment in employment and occupation.

Respect and Dignity

The Society’s suppliers shall prohibit and refuse to tolerate, and not confer upon its workers, any unacceptable or degrading treatment, including mental cruelty, sexual harassment or discrimination, gestures, language or physical contact that is sexual, coercive, threatening, abusive or exploitative.

Freedom of Association

The Society's suppliers shall respect the legal rights of employees to join or to refrain from joining worker organisations, including trade unions.

Health and Safety

The Society's suppliers will provide their employees with a safe and healthy working environment in compliance with all applicable laws and regulations.

The Supplier shall do its utmost to control hazards and take necessary precautionary measures against accidents and occupational hazards. Whenever necessary workers are to be provided with, and instructed to use, appropriate personal protective equipment. The Supplier shall provide adequate and regular training to ensure that workers are adequately educated on health and safety issues and provide the same standard of health and safety in any housing that is provided for employees.

Protection of the Environment

The Society's suppliers shall undertake initiatives to promote greater environmental responsibility.

At a minimum, the supplier must comply with all applicable environmental laws, regulations, permits and licences, such as requirements regarding chemical and waste management and disposal, recycling, industrial wastewater treatment and discharge, air emissions controls, environmental permits and environmental reporting.

The supplier shall minimise its environmental impact and continuously improve its environmental performance in accordance with better practice standards.

Laws, Including Regulations and Other Legal Requirements

The Society's suppliers will comply with all applicable laws and regulations in all locations where they conduct business.

Ethical Dealings

The Society expects our suppliers to conduct their business in accordance with the highest ethical standards.

The Society's suppliers shall comply with applicable laws and regulations concerning bribery, corruption, fraud and any other prohibited business practices. The supplier shall not offer, promise or give any undue advantage, favour or incentive to any public official, organisation or any other third party. This applies regardless of whether the undue advantage is offered directly or through an intermediary.

Gifts, Hospitality and Expenses (Business Courtesies)

The Society's suppliers shall not, directly or indirectly, offer gifts to the Society's employees or representatives or anyone closely related to these, unless the gift is of modest value.

Hospitality, such as social events, meals or entertainments may be offered if there is a business purpose involved, and the cost is kept within reasonable limits. Hospitality, expenses or gifts shall not be offered or received in situations of contract negotiation, bidding or award.

Monitoring/Record Keeping

The Society's suppliers must maintain documentation necessary to demonstrate compliance with these Supplier Engagement Principles (SEP) and must provide the Society with access to that documentation upon the Society's request.

DEFINITIONS

Cross functional working group/Modern Slavery working group: a group of employees of St Vincent de Paul NSW and Amelie Housing which progresses our work on Modern Slavery, the development of the Statement and supports the Society with its compliance with the Modern Slavery Act.

High risk suppliers: products and services may have high Modern Slavery risks because of the way they are produced, provided or used and may have characteristics such as low wages and manual labour.

Medium risk suppliers: products or services may have medium Modern slavery risks because of their sector or because of weak governance structures in a geographic location or entity.

Supplier Ethical Data Exchange (SEDEX): a membership organisation that provides an online platform, tools and services to help business operate responsibly and sustainably, protect workers and sources ethically.