



St Vincent de Paul Society  
NSW  
*good works*



# MODERN SLAVERY

# STATEMENT

1 JANUARY – 31 DECEMBER 2022

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## Disclosure Note

This Statement has been made on behalf of the 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.

Reporting period: 1 January 2022 to 31 December 2022



## 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

In Australia around 15,000 people are enslaved, with the additional risk that procurement through international supply chains, exposed to slavery, adds to the global suffering of over 40 million people.

The Society of St Vincent de Paul is a values-based organisation. Our underlying concern for the women, children and men trapped in slavery is generated by our commitment to protect the sacredness of life, to defend the God-given dignity of each person and to show a unique concern for the most vulnerable.

This special concern – or ‘preferential option for the poor’ – is foundational to the Society of St Vincent de Paul and all our good works.

No work of charity is foreign to the Society. We are called to seek out and find those in need. This includes being vigilant for emerging injustices and forms of hardship throughout the communities in which we operate.

The extent of Modern Slavery in Australia and around the world is one such area warranting growing awareness and appropriate action.

We are committed not only to alleviating the need of victims and survivors of Modern Slavery but also to identify the unjust structures that are the cause of it.

In the words of our founder Blessed Frédéric Ozanam,

*Charity is the Samaritan who pours oil on the wounds of the traveler who has been attacked. But, it is justice’s role to prevent the attacks.*

In charity and in justice, let us continue to raise awareness of the scourge of Modern Slavery in Australia and around the world. Let us be mindful of all the circumstances where we may encounter people who are enslaved or at risk and be prepared to report our concerns.

## Approval And Signature

This Modern Slavery Statement was approved by the principal governing body of the St Vincent de Paul Society NSW as defined by the Modern Slavery Act 2018 (Cth) (“the Act”) in June 2023.

This Modern Slavery Statement is signed by a responsible member of St Vincent de Paul Society NSW as defined by the Act.



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



A handwritten signature in black ink, appearing to be 'R. Stewart'.

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



A handwritten signature in black ink, appearing to be 'D. Walsh'.

**Denis Walsh**  
Chair of the Board  
St Vincent de Paul Housing

# REPORTING CRITERIA 1

## About the St Vincent de Paul Society NSW

**The St Vincent de Paul Society is a member and volunteer based organisation that has been assisting people experiencing disadvantage and hardship in NSW for almost 140 years.**

The Society was founded by a 20 year old man named Frederic Ozanam in 1833 who, with a group of friends, wanted to alleviate the poverty and disadvantage that he saw around him in post revolution France. Leading by example and, with boundless energy, Frederic started what is now a worldwide movement in just 20 short years.

The St Vincent de Paul Society NSW currently has more than 13,000 members and volunteers across the state, who give tirelessly of their time. In total, we have 372 local member networks, referred to as Conferences, present in communities across NSW.

Our members, volunteers and staff help people experiencing 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.

Importantly, we also provide vital emotional support and referral services as needed.

The St Vincent de Paul Society NSW is also a leading provider of frontline services, with 100 local services across the state. These deal with a range of issues including homelessness, domestic and family violence, disability, mental health, youth wellbeing, refugee and migrant inclusion, rehabilitation and problematic alcohol and other drug use.

### Head office:

2C West Street, Lewisham NSW 2049

### 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.

Our Annual Consolidated Revenue for the period 1 July 2021 to 30 June 2022: \$192.5 million.

## In the 2021/2022 Financial Year, we:

- ✓ supported 8,607 people through our health, housing and homelessness service and day centres
- ✓ assisted 34,000 people through our membership
- ✓ served 53,345 meals at the Matthew Talbot Hostel
- ✓ provided \$8,300,000 in assistance through our state-wide network of members
- ✓ delivered 6,350 doses of COVID-19 vaccine as part of the collaboration with St Vincent' Hospital at sites including the Ozanam Learning Centre
- ✓ provided 11,725 medical appointments at the Matthew Talbot Hostel clinic
- ✓ assisted 1,240 people manage drug and alcohol addiction
- ✓ facilitated 8,150 instances of people accessing activities
- ✓ assisted 321 people living with disability with employment opportunities, recreation and leisure programs and respite and outreach facilities
- ✓ assisted 149 people with support and coordination in accessing the NDIS
- ✓ raised \$3,800,00 through the Vinnies NSW Flood appeal to support impacted communities in Northern NSW
- ✓ provided immediate cash payments to over 6000 people following the Northern NSW floods in early 2022
- ✓ assisted 2,051 women experiencing domestic and family violence with crisis accommodation and outreach case management
- ✓ provided 912 people with tailored support at our Social and Affordable Housing units
- ✓ assisted 59% of people who accessed our Homelessness and Housing services secure stable accommodation

### OUR PLANS FOR 2023

We acknowledge our Modern Slavery response cannot be static. We are committed to ensuring it will continue to evolve and progress. Future initiatives and activities we are planning include:

- Review and relaunch of our supplier code of conduct (currently titled supplier engagement principles).

- Review and relaunch of our Procurement Policy and Procedures, including organisation and training and communications.
- In depth review and discussions with particular categories of high-risk suppliers. For 2023, cleaning and security will be our focus.

# REPORTING CRITERIA 2

## Our Structure, Operations and Supply Chains

### OUR ORGANISATIONAL STRUCTURE

The St Vincent de Paul Society in NSW is comprised of three separate but related legal entities:

- **The Trustees of the Society of St Vincent de Paul (NSW)** is a body corporate incorporated under the Roman Catholic Church Communities' Lands Act 1942 (NSW). The Trustees are elected by the members and appoint the Board of the Company.
- **The St Vincent de Paul Society NSW** is a public company limited by guarantee.
- **St Vincent de Paul Housing** is also a public company limited by guarantee. It is a special purpose vehicle through which we manage the maintenance and service provision of over 500 social and affordable housing units constructed through the NSW Government's Social and Affordable Housing Fund.

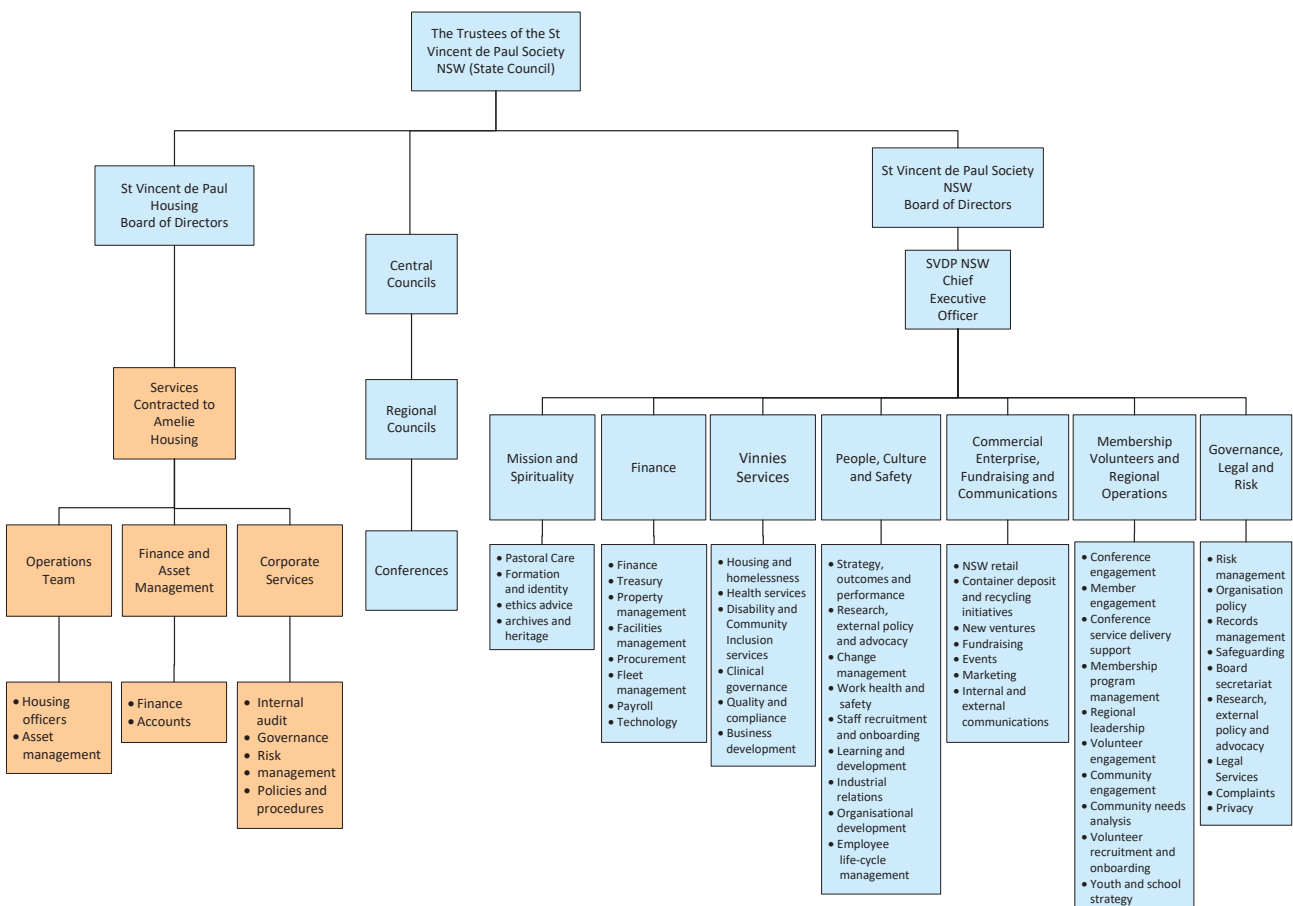
The three entities are a consolidated reporting group for the purpose of annual reporting to the Australian Charities and Not-for-profits Commission.

We are governed by a State Council (comprising the Trustees, who are all members of the Society) as well as Boards of Directors. The State Council is focused on fostering the work of our members and volunteers and driving action for justice, while the Boards govern company decision-making.

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 the 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 GOVERNANCE FRAMEWORK

The St Vincent de Paul Society NSW Board provides strategic oversight and direction for the activities of the company. 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 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 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 and chairs the cross-functional Modern Slavery Working Group (MSWG) which drives the Modern Slavery work in the Society in NSW
- The Director Governance, Legal and Risk is responsible for organisational governance and ensuring that governance policies and procedures are current and compliance, including in relation to Modern Slavery
- Executive Directors are responsible for ensuring their staff comply with the organisations policies and practices.
- The MSWG meets six times per year and its progress is reviewed by the Governance Committees of The St Vincent de Paul Society NSW and St Vincent de Paul Housing
- Staff appointed to the MSWG include:
  - Chief Financial Officer (Chair)
  - Culture and Inclusion Partner
  - Director Procurement and Fleet
  - Director, Property and Facilities
  - EA to the Chief Financial Officer
  - Manager, Volunteer and Member Programs
  - Mission, Spirituality and Pastoral Care Partner
  - National Asset Manager
  - Procurement and Fleet Specialist
  - Senior Legal Officer
  - Senior Risk Officer



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

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

St Vincent de Paul Society NSW 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

The St Vincent de Paul Housing Board is assisted, by its Governance Committee, to maintain compliance with corporate governance standards.

Amélie Housing's Chief Financial Officer and Operations Director have contractual responsibility for procurement in respect of St Vincent de Paul Housing.

The National Corporate Services Director is responsible for organisational governance and ensuring that governance policies and procedures are current.

## OUR FOOTPRINT

We are an organisation whose focus is on serving the most disadvantaged, including people at risk of Modern Slavery.

We have a significant presence in NSW with operations across the State. Our members are arranged in five regions aligned with Catholic dioceses. Our employees 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 drought and bushfires, and deliver emergency assistance.

### Vinnies Services

Our professional services include social services including homelessness and housing services; disability and community inclusion services; and health services, including drug and alcohol recovery 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 stores 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 stores are staffed with a combination of volunteers and employees. 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 stay in the local 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 and operate seven sites. 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 stores.

## Social and Affordable Housing

As a provider under the NSW Government's Social and Affordable Housing Fund (SAHF), St Vincent de Paul Housing is contracted to build 502 units for people on low to moderate incomes. The units were completed 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 was a Special Work of the St Vincent de Paul Society, registered with the National Disability Insurance Scheme (NDIS) to employ people living with disability at Work Centres in Stanmore, West Ryde and Coonamble.

In late 2022, a difficult decision was made to close the Stanmore and West Ryde services. While Australian Disability Enterprises (ADEs) have provided people with disability opportunities to work, they do not offer appropriate opportunities for people with disability to be part of an inclusive workplace, meaning that the model does not align with our organisation's Disability Inclusion Action Plan. It also does not align with the Royal Commission's consideration of wage equity for people with disability and the need to develop opportunities for people with disability to be in open employment where possible.

In response to the closures, supported employment pathways commenced in 2023. Our ADE employees are being supported through this transition.



## OUR SUPPLY CHAIN

We seek to cultivate strong working relationships with our suppliers, as they are fundamental to facilitating our Vision to provide “a hand up” to people in need and our Mission to shape a more just and compassionate society providing aid and support to individuals and families in need of our help. We do this by establishing and developing transparent and collaborative relationships with new and existing suppliers from the outset of our initial contact with them and throughout the business relationship.

Our central procurement function within the Society continues to mature and develop through the progressive implementation of consistent procurement procedures across the organisation. This has remained a key focus, in conjunction with the implementation of our centralised contract and supplier Register. The Register which allows us to centrally manage our supplier agreements and understand their risk status and record terms agreed regarding modern slavery.

The St Vincent de Paul Society NSW and Amelie Housing have diverse supply chains. The goods and services we procure include:

- Building and construction services.
- Cleaning and security services.
- Events and event management (fundraising agency, digital and creative services).
- Facility Management and property maintenance.
- Food and catering.
- Furniture, office supplies, and other consumables.
- ICT Hardware/ICT software and network services.
- Linen, laundry, and textile products.
- Motor vehicles and fleet management services.
- Professional Services.
- Skilled labour hire.
- Waste management services.

# REPORTING CRITERIA 3

## Modern Slavery risks in operations and supply chain

### MODERN SLAVERY RISK MANAGEMENT INITIATIVES

We:

- Continued to participate in the Australian Catholic Anti-Slavery Network ACAN Modern Slavery Risk Management Program.
- Increased awareness of Modern Slavery among our people, through ongoing training and communications. We also conducted an online launch of the 2021 Modern Slavery Statement in July 2022 to align with the UN Day Against Human Trafficking with an address by the St Vincent de Paul Society (NSW) State President and key speakers from the University of Notre Dame, and ACAN.
- Our member-based Social Justice Network in Lismore hosted a Modern Slavery Webinar.
- Participated in webinars: *The Modern Slavery Act: What business must do* (hosted by the Governance Institute of Australia) and *How to make progress tackling Modern Slavery*.
- Continued to engage actively with suppliers to increase awareness of the risks of Modern Slavery, and our expectations of them to address those risks.
- Negotiated with new suppliers to ensure new contracts, where appropriate, include anti-Modern Slavery requirements.
- Developed standard contracts that include anti-modern slavery clauses, including templates specific to property and building contractors.

### 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 and reviews over the past two years, we consider our operations do not cause or contribute to Modern Slavery. However, having regard to the nature and location of our suppliers we do have some areas of vulnerability, such as: cleaning and security services, waste management services, building and construction, facility management and property maintenance.



## OUR PEOPLE

The work of the Society de Paul Society NSW is carried out by approximately 11,400 members and volunteers supported by approximately 1,300 employees.

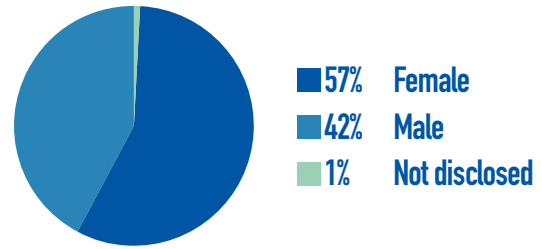
The majority of our members, volunteers and employees are women. New employees complete induction training that includes our Code of Conduct, Respectful Workplace and Anti-Discrimination and Equal Opportunity. My Introduction to Modern Slavery is available to employees.

The majority of the Society's employees are covered by awards and are paid at or above the pay rate for their award classification. Managers or professionals not covered by any award are protected by the National Employments Standards regarding their pay and hours worked. Compliance with awards and statutory entitlements is checked each year. Any employee is free to be a union member. A small number of employees holding visas were employed in 2022 and their visa status is noted during the recruitment process.

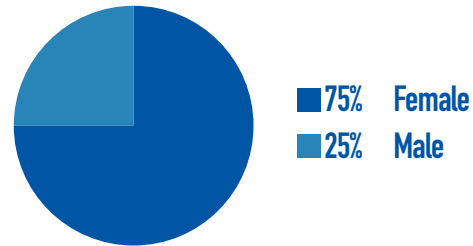
Where we engage agency staff who are not employees of the Society, we require those companies to have a Modern Slavery Policy to minimise the risk of unlawful treatment and ensure the wellbeing of their staff.



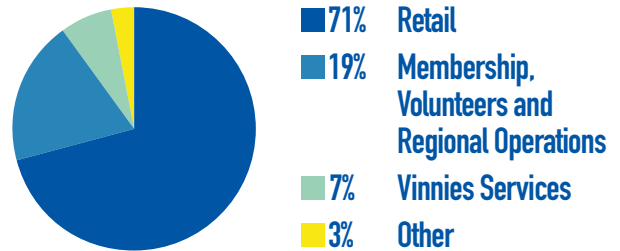
Member Gender



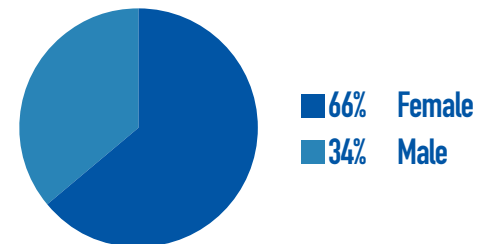
Volunteer Gender



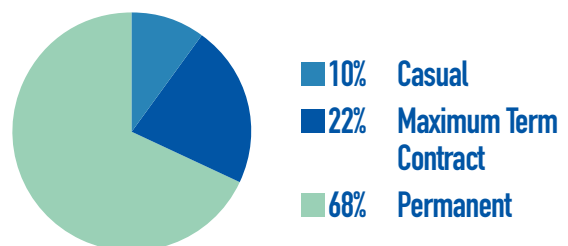
Where Volunteers Work



Employee Gender



Staff type of Employment



## SUPPLY CHAIN RISKS

During 2022, we continued to map our suppliers and analyse 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).

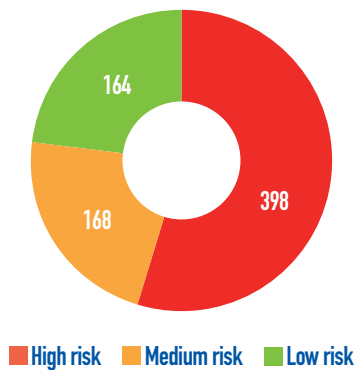
The graph illustrates the Modern Slavery Risk ratings by our highest spend categories.

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.

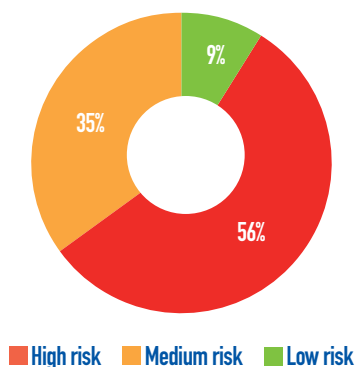
56% of the total spend analysed is considered high risk, and comprises more than 398 suppliers from 10 supplier categories:

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

### SUPPLIERS BY RISK CATEGORY



### RISK BY SPEND



A further 35% of our total spend is with 168 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.



## REPORTING CRITERIA 4

### Actions taken to assess and address risk

#### In 2022, SVDP NSW:

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

- Continued to build our supplier register to record compliance data against suppliers as we engage with them.
- Convened six bi-monthly meetings of the cross-functional working group.
- Engaged in detailed discussions with particular suppliers in high-risk categories to gain information about their practices and their supply chain. During 2022 the emphasis was on suppliers of bedlinen, towels and furniture.
- Ensured that our organisational policies continue to align with our obligations under the Modern Slavery Act.
- Ensured we included our standard anti-Modern Slavery contract clauses in all new supplier arrangements and existing agreements as they fell 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.
- Launched our 2021 Modern Slavery Statement to members and staff with an address by our State President, and speakers from the University of Notre Dame Australia, ACAN and the Modern Slavery Working Group.
- Participated in 10 monthly ACAN events and leveraged their professional support and advice.
- Revisited and reassessed our gap-analysis to understand our progress and identify areas of activity which required greater attention.

As our operations, including those performed by our network of members and volunteers, are spread across metropolitan, regional, and remote NSW, we have a very high volume and broad mix of suppliers, with a low annual

spend. Given the diversity of industries we conduct business with, we acknowledge education and support in respect of Modern Slavery will always form a part of the ongoing discourse we have with our suppliers.

During 2022, the activities we have conducted in support of supplier education, as well as our assessment and identification of Modern Slavery risk in our operations and supply chain has included:

- Continued monitoring of relevant government and industry advice in respect of modern slavery and best practice for mitigating operational and supply chain risks.
- Reviews and audits conducted with a number of high-risk suppliers to understand their supply chains and how they are assessing, identifying, and mitigating their Modern Slavery risk.
- Continued implementation of our centralised contract management register.
- Negotiated Modern Slavery contractual terms with all new suppliers onboarded through Procurement.
- Developed standard supplier contract templates to include Modern Slavery clauses including agreements for IT services, general consulting services property and maintenance services, construction and procurement of goods.

In addition, we continued to focus on procurement categories at high risk of Modern Slavery as part of our supplier engagement program. These high-risk categories included facility management and property maintenance, cleaning and security, building and construction, waste management, and linen and textiles. In engaging with our high-risk industry suppliers, we're continuing to increase awareness of the *Modern Slavery Act 2018* (Cth) and risks of Modern Slavery within our business and understand and influence how our suppliers are addressing the risk of Modern Slavery in their operations and supply chains.

Consideration of the risk of Modern Slavery now forms part of our standard procurement due diligence process when seeking new sources of supply. When engaging with potential new suppliers, particularly those that operate in high-risk industries or regions, we have elected not to enter a business relationship with some suppliers due to our assessment of their supply chain risks and practices.

Where suppliers are not aware of the Modern Slavery Act, we take the time to provide them with educational material and work with them to understand the risks in their supply chain. This has included reviewing social audit documentation and having detailed discussions with suppliers about their supply chain and operations. Many of our suppliers have confirmed their awareness of the legislation and steps taken to address Modern Slavery including:

- A supply chain that included other entities required to report on Modern Slavery
- Certifications e.g., Chain of Custody; ISO 9001:2015
- Established grievance procedures, including whistleblower policies and hotlines
- Ethical sourcing policy
- Membership of Suppliers Ethical Data Exchange (SEDEX) to assess supply chain transparency.
- Modern Slavery and Human Rights Policy
- Modern Slavery statement
- Practices to reduce the risk of Modern Slavery
- Supplier code of conduct
- Training on Modern Slavery for staff where appropriate for staff

Our supplier engagement activities during 2022 included:

- Assessing Modern Slavery risk each time we conducted a Request for Proposal and ensuring that all ensuing supplier agreements included anti-Modern Slavery clauses
- Continued to retrospectively amend contractual terms with a number of our high and medium risk suppliers to include anti-Modern Slavery clauses
- Review of our high and medium risk suppliers to understand their commitment and response to identifying and addressing Modern Slavery risks and practices progressed. 62% of our spend with high-risk suppliers, and 59% with medium risk suppliers (assessing suppliers with annual spend of \$10,000 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.
- Undertaking a significant project to establish new relationships with providers of textiles and furniture, prompted by an evaluation of our existing providers and an assessment that their products and supply chain practices did not meet our needs or requirements.

Modern Slavery risk formed an active part of discussions with potential new suppliers due to the high-risk nature of their industry and production locations and was significant in our decision making for the selection of our preferred providers.

## Grievance Mechanism and Remediation

The Society has an Internal Grievance Policy and Procedure which allows Society personnel to raise workplace-related concerns and a Whistleblower Policy under which they can report any suspected wrongdoing.

In 2022 ACAN established a project with the Ulula worker voice and grievance platform. Ulula allows for worker surveys to be deployed and anonymous reporting of concerns to Domus 8.7, the ACAN remediation service. Domus 8.7 provides case assessment, management, coordination and referrals for people impacted by modern slavery to enable effective remedy and prevent future impacts.

St Vincent de Paul Society NSW and St Vincent de Paul Housing are committed to providing appropriate and timely remedy to people impacted by Modern Slavery in accordance with the United Nations Guiding Principles on Business and Human Rights, 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 SVDP NSW or SVDP Housing is found to have caused, contributed to Modern Slavery Where SVDP NSW and SVDP Housing are directly linked to Modern Slavery by a business relationship SVDP NSW and SVDP Housing 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 SVDP NSW and SVDP Housing to ensure victim centred remediation processes are implemented to the satisfaction of SVDP NSW or SVDP Housing.

The Society also has an Internal Grievance Policy and Procedure which allows Society personnel to raise workplace-related concerns. The Society also has a Whistleblower Policy under which they can report any suspected wrongdoing. There is a confidential Whistleblower hotline and email facility which is managed and staffed by an external independent third party. Through these policies and measures we aim to ensure the safety and wellbeing of all Society personnel and ensure they are not at risk of Modern Slavery.

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. SVDP NSW and SVDP Housing has funded a “Grievance Mechanisms and Remedy Pathways” module in its Modern Slavery E-Learning course.

# REPORTING CRITERIA 5

## Effectiveness assessment

### Modern Slavery Gap Analysis

Our gap analysis shows that in 2022, we improved in the category: business systems. Progress was maintained in all other categories.

### Change Analysis

| CATEGORY                        | TOPIC                             | RESULTS PREVIOUS YEAR | RESULT CURRENT YEAR | CHANGE |
|---------------------------------|-----------------------------------|-----------------------|---------------------|--------|
| Management Systems              | Governance                        |                       |                     | —      |
|                                 | Commitment                        |                       |                     | —      |
|                                 | Business Systems                  |                       |                     | ▲      |
|                                 | Action                            |                       |                     | —      |
|                                 | Monitoring and Reporting          |                       |                     | —      |
| Risk Management                 | Risk Framework                    |                       |                     | —      |
|                                 | Operational Risk                  |                       |                     | —      |
|                                 | Identifying External Risks        |                       |                     | —      |
|                                 | Monitoring and Reporting on Risk  |                       |                     | —      |
| Human Resources and Recruitment | Awareness                         |                       |                     | —      |
|                                 | Policies and Systems              |                       |                     | —      |
|                                 | Training                          |                       |                     | —      |
|                                 | Labour Hire / Outsourcing         |                       |                     | —      |
| Customers and Stakeholders      | Customer Attitude                 |                       |                     | —      |
|                                 | Information Provision             |                       |                     | —      |
|                                 | Feedback Mechanisms               |                       |                     | —      |
|                                 | Worker Voice                      |                       |                     | —      |
| Procurement and Supply Chain    | Policies and Procedures           |                       |                     | —      |
|                                 | Contract Management               |                       |                     | —      |
|                                 | Screening and Traceability        |                       |                     | —      |
|                                 | Supplier Engagement               |                       |                     | —      |
|                                 | Monitoring and Corrective Actions |                       |                     | —      |

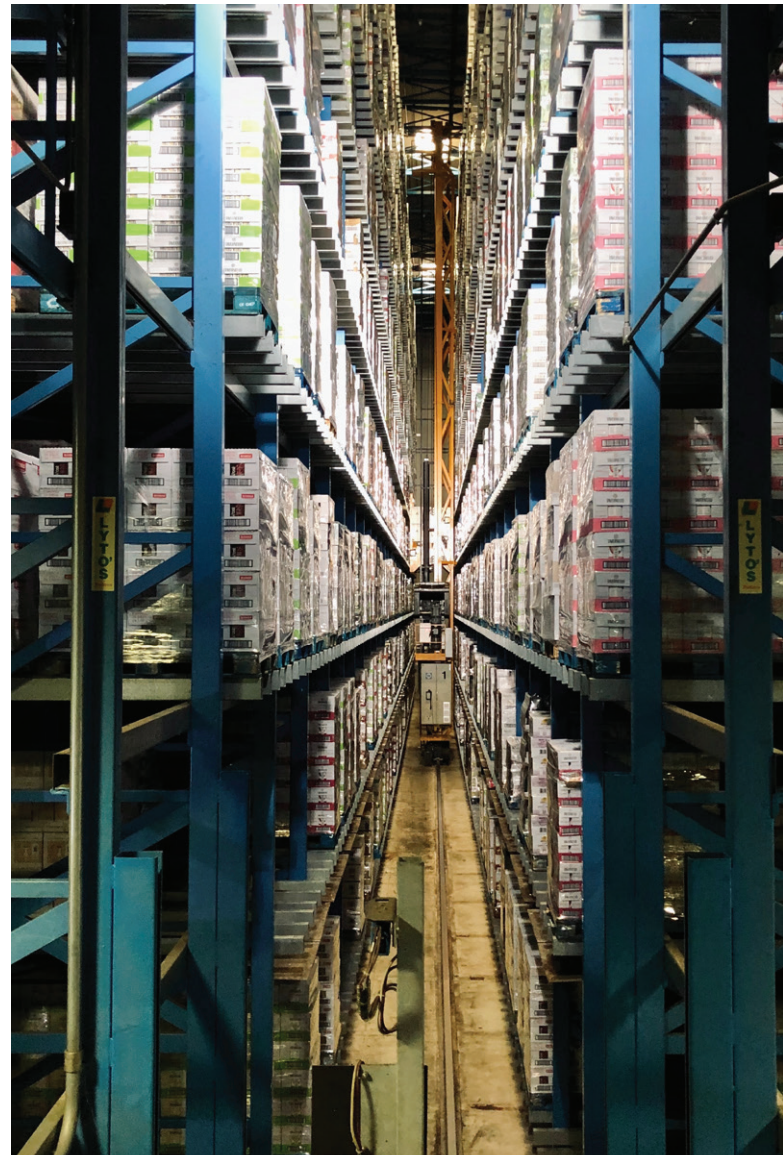
Our Modern Slavery Action Plan is reviewed by the Governance, Risk and Nominations Committee and by the St Vincent de Paul Housing Governance Committee.

The Risk Management Framework specifically addresses the risk of Modern Slavery.

| INDICATORS/TARGET 2022  | OUTCOME  |         |
|---|----------|---------|
|   | ACHIEVED | ONGOING |
| 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 onboard them to SEDEX. | ✓        | ✓       |
| Continue to progressively review and ensure anti-Modern Slavery terms are agreed in high-risk supplier contracts.   | ✓        | ✓       |

As we continue to develop and embed our risk and supplier management frameworks and business systems on an enterprise level, we are:

- Continuing to participate in Australian Catholic Anti-Slavery Network (ACAN) Modern Slavery risk management program.
- Incorporating evaluation of Modern Slavery risk into our business-as-usual procurement processes.
- Continuing to ensure awareness of Modern Slavery with our Board, our people and suppliers.
- Ensuring Modern Slavery risk is actively considered when sourcing new suppliers, particularly in high-risk categories.
- Collaborating 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 MSWG responsible for the Modern Slavery risk management program include representatives from St Vincent de Paul NSW and St Vincent de Paul Housing.**

In 2022, the more regular meetings of the working group enabled an increase of momentum and allowed a more mature idea 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 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 capacity or assist community members to earn an income 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 which 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.

St Joseph's Workshop is a volunteer-based service that supports the work of the St Vincent de Paul Society by manufacturing a range of high-quality furniture items that are provided to people experiencing hardship. The St Joseph's workshop produces over 1,600 items of sustainable furniture every year including drawers, children's tables and chairs, toy boxes and clothes racks.

The service operates from a well-equipped factory, that sources a large percentage of its timber and materials used in production from local donations of offcuts and recycled building materials.

# 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](http://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.