



Modern Slavery Statement 2022

Disclosure Note

This statement has been made on behalf of the Diocese of Parramatta. This statement relates to the year end 31 December 2022. For 2022 as in previous years, the statement focuses on work performed within the Diocese's largest agency, *Catholic Education Diocese of Parramatta ABN 86 875 623 906 (CEDP)* as well as The Chancery Office of the Diocese of Parramatta ABN 99 716 962 606 (Chancery).

Catholic Education Diocese of Parramatta is the Reporting Entity. CEDP's Head Office is located at the Bethany Centre, 470 Church Street, North Parramatta NSW 2150.

Approval, Signature and Message

Bishop Vincent Long Van Nguyen OFM Conv, Bishop of Parramatta

“And the King will answer them, ‘Truly I say to you, as you did it to one of the least of these my brothers, you did it to me.’” Matthew 25: 40

Dear Sisters and Brothers in Christ,

I am pleased that for the third year, the Diocese of Parramatta has produced a Modern Slavery Report for the year 2022.

As one of the largest non-government employers and producers of goods and services in Australia, the Catholic Church has a pivotal role in ensuring that our workplaces and practices are free from any forms of modern slavery.

Each year, we are presented with horrific statistics on the global number of people who are victims of modern slavery. People who are trapped in forced labour, child labour, forced into marriage, people who are trafficked, or held in debt bondage. It is a blight on our society, that in 2023, people continue to be mistreated in the most inhumane ways.

We all have a part to play in confronting modern slavery and ensuring our supply chains are ethical and respect the dignity of each person.

I am pleased that our parishes and agencies across the Diocese of Parramatta have a firm commitment to not only denouncing modern slavery in all its forms but finding practical ways to help dismantle and eliminate modern slavery.

As the Bishop of Parramatta, I fully support this report and encourage all parishioners and community groups within our Diocese to learn more about modern slavery and find ways to be the face of Christ in all our interactions.

St Josephine Bakhita, Patron Saint of Victims of Modern Slavery and Human Trafficking, Pray for Us.



Bishop Vincent Long Van Nguyen OFM Conv
Bishop of Parramatta

20 June 2023

This Modern Slavery Statement was approved by the principal governing body of The Diocese of Parramatta as defined by the Modern Slavery Act 2018 (Cth) (“the Act”) on 20 June 2023. This modern slavery statement is signed by a responsible member of the Diocese of Parramatta as defined by the Act.



Contents

- Disclosure Note 2
- Approval, Signature and Message 3
- Reporting Criteria 1 & 2: About Diocese of Parramatta and Catholic Education Diocese of Parramatta 5**
 - About us 5
 - Catholic Education Diocese of Parramatta 5
 - Purpose, Intent and Priorities 6
 - Our Organisational Structure 7
 - Our Governance Framework 9
 - Our Operations 9
- Reporting Criteria 3: Modern slavery risks in operations and supply chain 10**
 - Our Supply Chain 11
 - Supply Chain Risk 12
- Reporting Criteria 4: Actions taken to assess and address risk 27**
 - Impact of COVID-19 29
 - Modern Slavery Action Plan and Road Map 30
 - 2022 Modern Slavery Risk Management Initiatives 30
 - Modern Slavery Working Group 31
 - Modern Slavery Policy, Procedures and Guidelines 31
 - Participation in Modern Slavery Supplier Webinars 31
 - eLearning 31
 - Our Staff Allocation 33
 - Remediation 34
 - Our 2022 Completed and Outstanding Plans 36
 - Our Plans Beyond 2022 38
- Reporting Criteria 5: Effectiveness Assessment 46**
 - Modern Slavery Gap Analysis 46
 - ACAN Calendar Events 2023: 49

Reporting Criteria 1 & 2: About Diocese of Parramatta and Catholic Education Diocese of Parramatta

About us

The Catholic Diocese of Parramatta is an unincorporated association that is part of and associates itself for civil law purposes through the Trustees of the Roman Catholic Church for the Diocese of Parramatta.

The Trustees of the Roman Catholic Church for the Diocese of Parramatta is incorporated under the Roman Catholic Church Trust Property Act 1936.

The Trustees are the custodian of the assets of the various unincorporated associations and the association is governed by the Code of Canon Law 1983.



Originally classified as the Western Region of the Archdiocese of Sydney, the Diocese of Parramatta was created by Pope John Paul II on 8 April 1986 but most parishes are much older – Parramatta parish was established in 1827, Windsor in 1832 and Penrith in 1839, while Rouse Hill was formed in 2007.

The Diocese, under the leadership of the Bishop, serves the People of God in the west of Sydney reaching from Dundas Valley, west to Megalong Valley, south to Bringelly, and north to Wisemans Ferry. The Diocese takes in seven local government divisions: The Hills Shire, Blacktown City, Blue Mountains City Council, Hawkesbury Shire, Cumberland Council, City of Parramatta, and Penrith City Council, as well as parts of Wollondilly and Liverpool. With more than 320,000 Catholics and covering an area of 4,289 square kilometres, the Diocese comprises 46 Parishes managed by their respective Parish Priests/Administrators. The Diocesan Head Office is located at 470 Church Street North Parramatta NSW 2150.

Catholic Education Diocese of Parramatta

The Diocese has a system of schools which are managed by a separate 'entity' named *Catholic Schools Parramatta Diocese Limited (CSPD)*. The change in name from Catholic Education Diocese of Parramatta (CEDP) to CSPD follows incorporation on 1 January 2023.

CSPD is an incorporated entity whose member is the Diocese of Parramatta, under the leadership of Bishop Vincent Long Van Nguyen OFM Conv DD STL. The Bishop delegates the responsibility of the management of the schools to the Executive Director. The Executive Director, Mr Jack De Groot, has a group of six Directors that form the Executive Team and provide strategic direction and leadership to CEDP. CEDP has been acknowledged as a separate entity for taxation purposes, being allocated its own ABN.

In 2022, CEDP managed 58 primary schools, 22 secondary schools and 2 trade and inquiry campuses. CEDP had 44,000 students and employed 5,000 teachers and staff.

The Diocesan schools' system is largely reliant on Commonwealth and State Government funding for the continued delivery of quality education and the provision of educational services to the Catholic and wider community. CEDP reviews all its operating budgets prepared by the individual schools and aggregates these school budgets with its own 'head office' functions in preparing consolidated operating and capital budgets. CEDP's revenue and expenditure for 2022 were \$818 million and \$740 million, respectively.

The education and formation of students in Catholic discipleship are at the heart of our Catholic school system. CEDP provides quality learning and teaching in a faith-centred environment.

Purpose, Intent and Priorities

The purpose, intent, and priorities of CEDP are:

Purpose

Catholic education is integral to the evangelising mission of the Catholic Church in the Diocese of Parramatta under the leadership of the Bishop. It is through learning and teaching that Catholic education promotes the work of the Church, the formation of the individual and the good of society.

Catholic schooling is a work of love, for the full human development of students, grounded in the person of Jesus Christ and at the service of society. All staff share in the evangelising mission of the Church as they endeavour to accomplish synthesis of faith, life, and culture in their communities.

Intent

Our intent is to transform the learning of each student and enrich the professional lives of staff within a Catholic learning community.

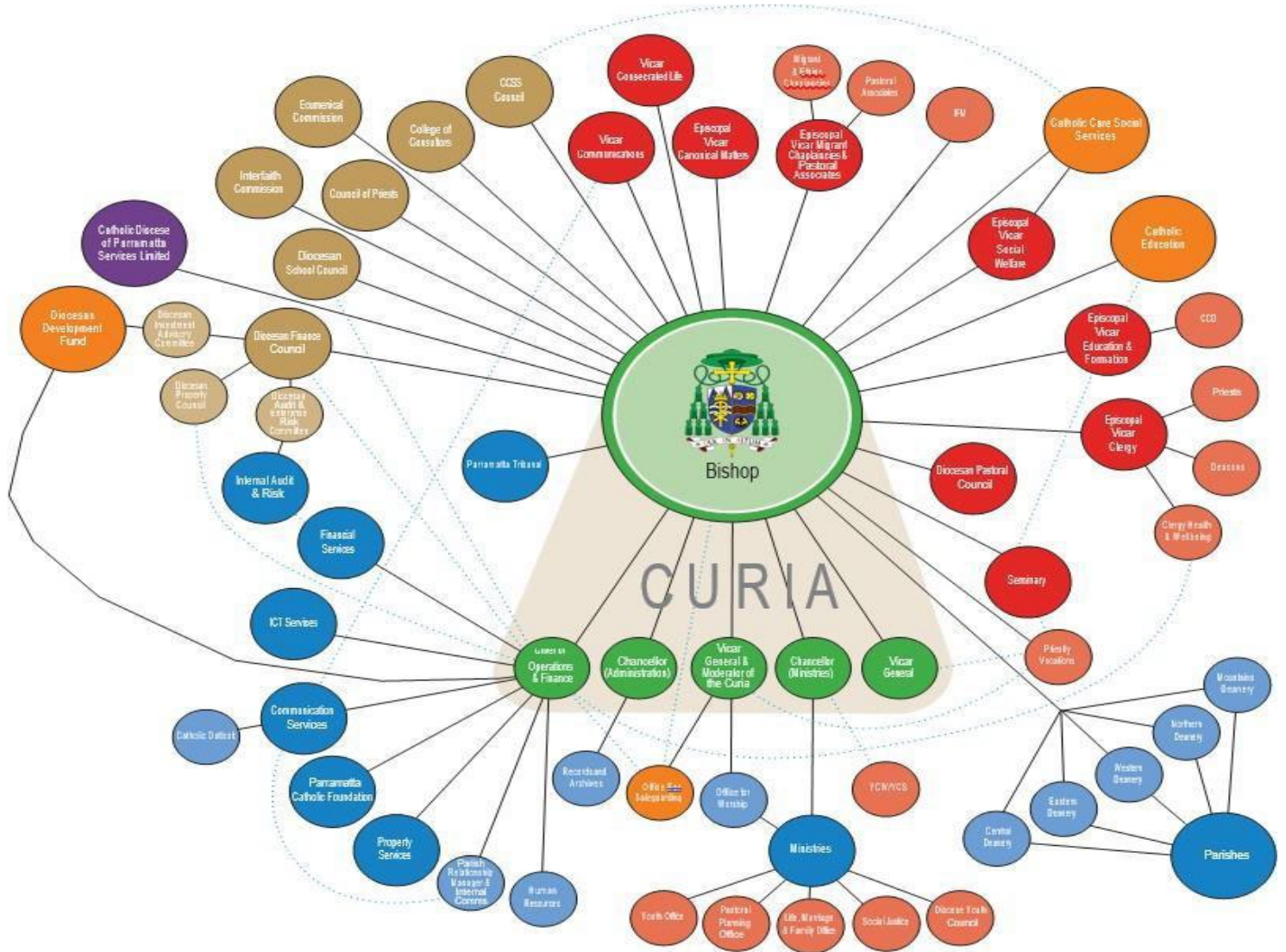
Priorities

CEDP's 2020-2025 priorities continues to be in the following areas:

1. Mission is counter cultural;
2. Learning is owned by the learner;
3. Equity is the norm; and
4. Everyone is a leader.

Our Organisational Structure

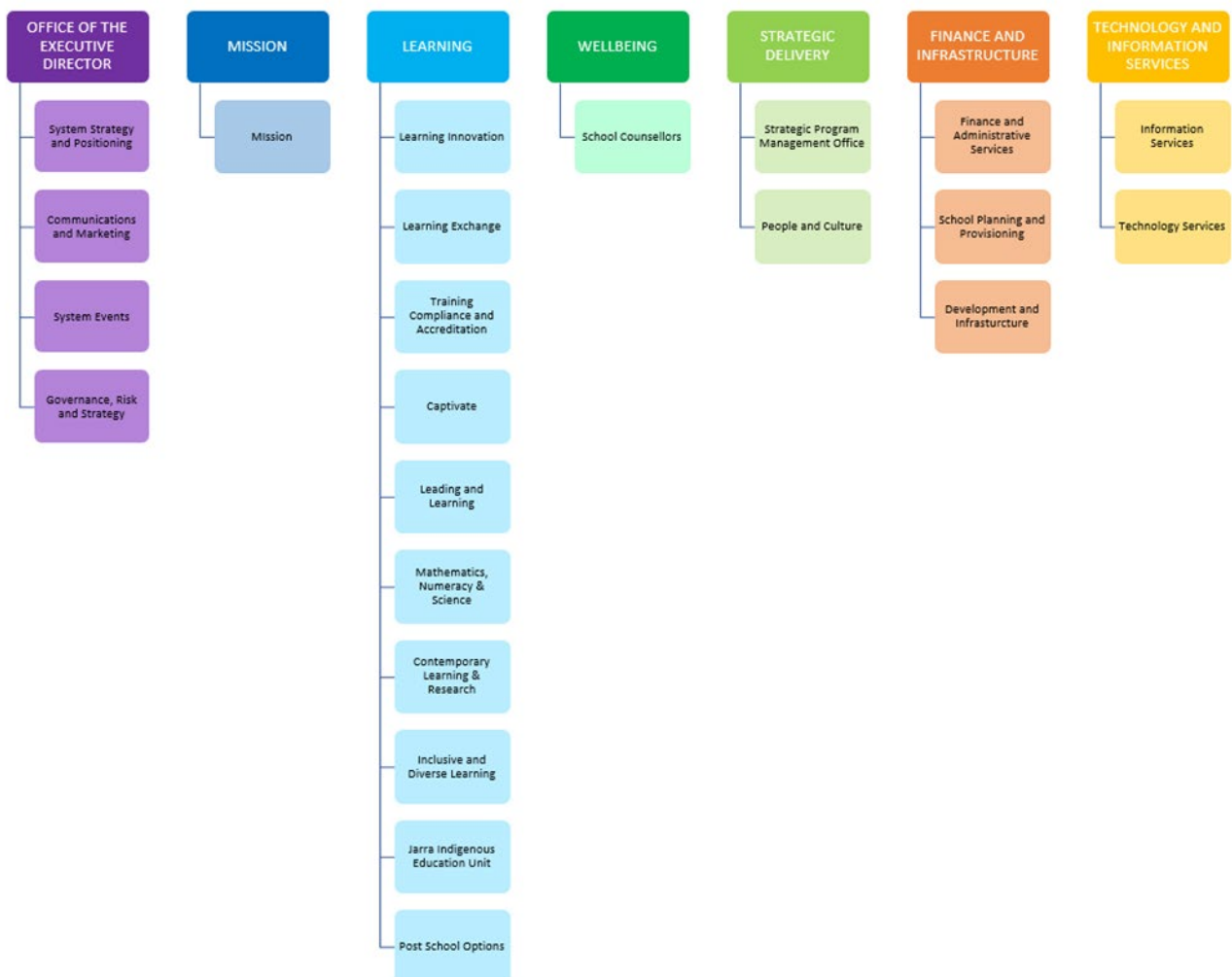
A graphic of the organisational structure of the Catholic Diocese of Parramatta follows. For the purpose of this Statement, the Diocese's largest agency, Catholic Education Diocese of Parramatta (CEDP), is also outlined below.



CEDP EXECUTIVE TEAM



CEDP SERVICE AREAS



Our Governance Framework

As a Diocese of the Roman Catholic Church, the Diocese of Parramatta's operations and the way the Bishop exercises his authority are governed by both canon law and civil law. The Diocese aims to keep a high ethical standard and a robust corporate governance framework. In this regard, the Diocesan Audit and Enterprise Risk Committee (DAERC) is in place to assist the Bishop, the Diocesan Finance Council, and the Diocesan Schools Council in fulfilling their oversight responsibilities to effective corporate governance. The Diocese recognises that this is critical to the success of eradicating modern slavery in the long term.

The Diocese and its agencies' approach to modern slavery compliance and its practical effectiveness is aligned with its policies related to conduct and ethical behaviour.

Managing the complex risk of modern slavery within our operations and supply chains requires ongoing commitment and collaboration between agencies and with our suppliers. Our Modern Slavery Working Group will continue to review our approach to human rights and modern slavery issues, including with respect to mitigation and remediation, and report our progress to the relevant committees and councils in charge of governance. The Modern Slavery Working Group draws representation from Chancery, Office of the Executive Director, and the Capital Resourcing and Mission Directorates.

Our Operations

Diocesan schools are managed by Catholic Education Diocese of Parramatta (CEDP). CEDP manages 82 Catholic Schools - (58 primary schools, 22 secondary schools and 2 trade pathway campuses), 43,000 students and 5,000 staff. The Central Office in Parramatta is in charge of all the activities that can be separated from the schools (i.e., payroll, recruitment, provision of technology, professional learning, facilities, etc) so schools can focus on their core business of teaching and learning.

The Diocesan Development Fund (DDF) provides a source of finance and credit for capital expenditure in the works of the Church and funds for welfare and pastoral programs in the Catholic Diocese of Parramatta.

Catholic Care Social Services (CCSS) is the official not-for-profit, professional social care agency of the Diocese and operates as an approved service provider contracted to deliver social care and education services to individuals, children, and families through a range of NSW and Australian government funded programs designed to meet the diverse needs of people living in local communities across the Diocese.

The above agencies are supported by their respective infrastructure, and by the Office of Bishop and the Diocesan Chancery which has its own administrative infrastructure and provides support to the Bishop and individual parishes.

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

Through the ACAN Program, CEDP continues to focus activities with suppliers of labour and the operational risk associated with the following labour supply chains:

Cleaning and security services

The cleaning and security sectors typically employ temporary migrant workers engaged via subcontracting arrangements with a high rate of noncompliance with workplace rights and entitlements. Equipment and consumables used in these sectors are largely manufactured overseas, predominantly in high risk countries such as China and Vietnam.

Facility management and property maintenance

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

Waste management services

The waste industry (including recycling) is a dangerous sector for workers with significant WHS risk such as exposure to toxic materials and pathogens, use of heavy machinery and dirty work environment. Modern slavery risks are similar to those faced by cleaners. Sub-contracting to small waste management companies is common across the sector as is the use of labour hire. Migrants and low-skilled workers are used in waste collection, handling and material recovery facilities.

Labour Hire

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

1. focus on low-skilled, low-paid, seasonal, temporary labour
2. recruitment of potentially vulnerable people such as new migrants, temporary work visa holders,
3. international students and undocumented workers
4. deceptive and opaque practices trapping workers into exploitative situations
5. demanding excessive fees for visas, travel and other work arrangements, leading to debt bondage
6. coercive control, threats, withholding workers' identity documents to limit their freedom of
7. movement and social isolation from community

The Diocese of Parramatta complies with labour, employment and immigration laws through a variety of HR policies and procedures including employment contracts; Code of Conduct; Employee Leave Policy; Flexible Working Arrangements; Harassment, Bullying and Discrimination Policy; Acceptable Use of Electronic Communication Systems and Devices; Child Protection/Safeguarding Policy; Complaints Management Framework/Policy; Performance Management Policy; Privacy and Confidentiality Policy; WHS Framework/Policies; Whistle-blower Policy. This covers a broad range of legislation that governs the HR/fair work practices of the Diocese.

Impact of COVID-19

The impact of COVID-19 on the Diocese's employees had reduced significantly in 2022; the Omicron variant notwithstanding. The impact on suppliers experienced in 2021 had a lingering effect in 2022, key areas being continued disruption to supply chains and difficulty in attracting staff.¹ Some key measures taken in 2021 to continue supporting workers and maintaining our supplier relationships were eased. These were:

1. Extension of contracts due for retendering in 2021. There was a resumption in tendering activities for contracts coming to the end of their term.
2. Canteen license fees reduced or waived in 2021 were reinstated., and automatic fee increases at contract anniversary reinstated.
3. Full fees reinstated for cleaning contracts as students resumed attendance.

Our Supply Chain

CEDP's Tier 1 suppliers are located in Australia, with the exception of very few foreign-based consultancies, partnering with CEDP in learning services and providing ICT subscription services. Construction and ICT are the two categories with the highest value and risk of modern slavery. Other categories identified as being high risk are uniforms and cleaning services.

¹ For example, in the uniform supply and cleaning services categories.

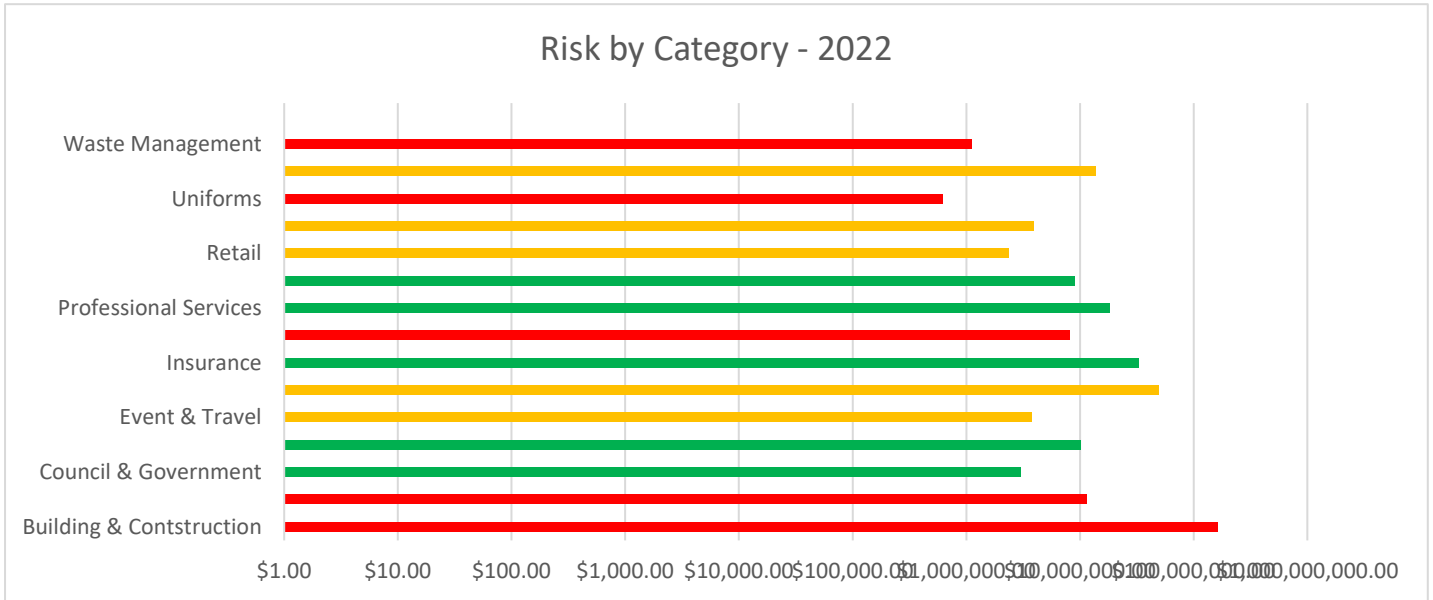
Supply Chain Risk

There has been no significant change to CEDP’s highest risk suppliers since 2021. The suppliers remain predominantly in the building and construction, uniform supply, cleaning and maintenance, ICT hardware and waste management services. The table below names some goods and/or services sourced by CEDP from these sectors and examples of the respective labour rights risks.

SECTOR	EXAMPLE GOOD OR SERVICE WITH POTENTIAL RISK	EXAMPLE LABOUR RIGHTS RISK
Building and Construction	Specific products and commodities deemed as high risk by the US Department of Labour’s 2018 List of Goods Produced by Child and Forced Labor, the Global Slavery Index (GSI) and other international guidance materials	<ul style="list-style-type: none"> ● Forced labour in the production of building and construction materials
Apparel/uniforms	Recognition of the clothing industry as one of the largest consumer industries. Potential for exploitation of workers, 70% of whom are women	<ul style="list-style-type: none"> ● Potential for exploitation of workers, 70% of whom are women ● Some products and commodities deemed as high risk by the US Department of <i>Labor’s 2018 List of Goods Produced by Child and Forced Labor</i>, the Global Slavery Index (GSI) and other international guidance materials
Cleaning and Maintenance	Cleaning services	<ul style="list-style-type: none"> ● Vulnerable or migrant labour is used, work is deemed as ‘3D’ work (dirty, dull, or dangerous) ● Below award wages ● Docking of wages
Technology/ICT hardware	Inputs into ICT hardware from conflict mineral areas	<ul style="list-style-type: none"> ● Worker exploitation in source countries of inputs into ICT hardware from conflict mineral areas e.g., cobalt, tungsten, tantalum, and gold from Central Africa (Republic of the Congo)

Waste Management	Waste management services such as rubbish removal and recycling	<ul style="list-style-type: none">● Similar to the cleaning & maintenance category which may feature a vulnerable or migrant labour workforce● Below award wages & docking of wages
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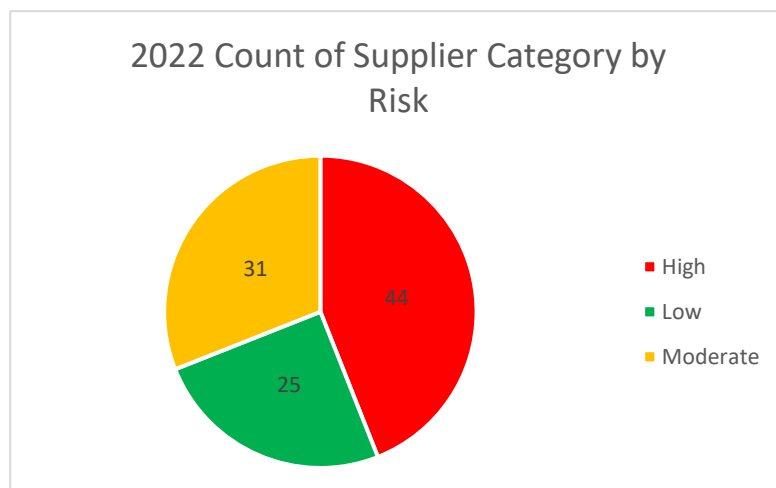
Using organisational spend data generated for the period 1 January 2022 to 31 December 2022, the top 100 suppliers made up 75.23% of total supplier spend. There were 15 categories across the top 100 companies that CEDP engaged by spend. Of the 15 categories identified, three risk categories were assigned based on ACAN recommendations of high, moderate, and low risk (red, amber and green).



The high-risk categories for CEDP are:

- Building and construction – 37.15% of top supplier spend
- Cleaning and maintenance – 2.62%
- Office Supplies & Furniture - 1.83%
- Uniforms - 0.14%
- Waste Management - 0.25%

The graph below shows that 44% of CEDP’s top suppliers by spend were in the high-risk category. A further 31% had moderate risk and the remaining 25% had a low level of risk attached to their operations.



The majority of the top suppliers are from CEDP’s building and construction partners (32 suppliers). The building and construction suppliers include builders, architects, consultants, engineers, plumbers, air-conditioning technicians, electricians, and associated providers. The next two biggest categories by both spend and numbers of suppliers is ICT (12 suppliers), followed by Professional Services and Cleaning & Maintenance with 10 providers each respectively. They include IT hardware, software and support suppliers, consulting, labour hire, cleaning, landscaping and maintenance services.



Reporting Criteria 4: Actions taken to assess and address risk

CEDP participated in the ACAN Program for assessing and addressing the risk of modern slavery and followed the supplier engagement plan:

1. Identification of suppliers in high-risk procurement areas via ACAN Procurement Taxonomy.
2. Supplier in high-risk categories were invited to complete the ACAN Supplier Survey.
ACAN
 - a. Program Managers assessed the survey results and determined the following:
 - b. Suppliers already members of Sedex
 - c. Suppliers willing to join Sedex
 - d. Suppliers classified as not required to join Sedex
 - e. Suppliers were assisted with the process to join Sedex and provided support to complete the Sedex Self Assessment Questionnaires (SAQ).
3. ACAN Program Managers then assessed the SAQ results, identified gaps in the supplier's management system such as further training and capacity building areas and the development of risk management strategies.

The ACAN supplier engagement plan identified common suppliers shared across multiple Catholic School systems within ACAN. Data relating to common suppliers increased leverage and reduced duplication of supplier engagement from multiple Catholic school systems.

An important part of the supplier engagement plan included an invitation to suppliers to CEDP to attend the 2022 ACAN webinar series. The purpose of the ACAN supplier webinar series was to assist suppliers to gain an understanding of modern slavery in relation to:

1. Business relevance and the Modern Slavery Act
2. Catholic customer/buyer expectations
3. How to access ACAN e-learning
4. Sedex supplier membership

CEDP put forward one of its uniform suppliers to speak about their modern slavery statement, audits and their risk management program at the uniform suppliers' webinar organised by ACAN.

Since mid-2021, the ACAN Program has provided CEDP with membership of Sedex - Supplier Ethical Data Exchange. Sedex is a global not-for-profit membership organisation supporting businesses to manage and improve social and environmental performance in supply chains.

Sedex provides a platform for businesses to share information and collaborate with suppliers and buyers, in order to promote ethical and sustainable practices throughout the supply chain.

As a member of Sedex, CEDP continues to benefit from a range of services and tools to manage supply chain risks, improve supplier engagement, and enhance ethical and sustainable business practices.

Sedex benefits include:

1. Improved transparency: Sedex provides a secure online platform for businesses to share information on ethical and environmental performance with customers, suppliers, and stakeholders. This helps to build trust and confidence in the business and supply chain.
2. Enhanced risk management: Sedex provides tools to help businesses identify and manage risks in their supply chain, such as labour rights abuses, environmental violations, and corruption. This can help to reduce the risk of reputational damage, legal liabilities, and supply chain disruptions.
3. Increased efficiency: Sedex provides standardised templates and tools for suppliers to report ethical and environmental performance, which can help to streamline the reporting process and reduce the administrative burden on businesses.
4. Access to expertise: Sedex offers training, resources, and guidance on ethical and sustainable practices, which can help businesses to improve performance and meet legal and regulatory obligations.
5. Competitive advantage: By demonstrating a commitment to ethical and sustainable practices, businesses can enhance their reputation and brand value.

Overall, SEDEX benefits CEDP by providing a platform for collaboration, transparency, and continuous improvement in supply chains, leading to better outcomes and a more sustainable future for all stakeholders.

The ACAN Program supported suppliers to CEDP with onboarding to Sedex and achieving these objectives:

1. Managing the risk of modern slavery with existing suppliers
2. Validating inherent risk against actual risk
3. Screening new suppliers as part of tenders and supplier on-boarding processes
4. Gaining visibility upstream in relevant supply chains
5. Monitoring and reporting on progress of suppliers
6. Development of an ACAN prequalification register of suppliers.

ACAN Program Managers supported CEDP by providing suppliers with clear steps on actions required, as outlined in the supplier engagement plan:

1. Designate a role to drive modern slavery engagement.
2. Complete the 5-minute ACAN pre-assessment survey.
3. Watch or participate in one of three ACAN supplier webinars conducted in 2022
4. Download the ACAN supplier powerpoint presentation and share with staff to raise awareness and ensure an understanding of CEDP's expectations in regard to the supplier-buyer relationship.
5. ACAN to connect suppliers with access to e-learning modules - Modern Slavery 101 and Modern Slavery Risk Management for Suppliers. Encourage suppliers to also retain completion certificates as evidence of modern slavery training other customers.

CEDP intends that Sedex will be utilised to:

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

Impact of COVID-19

The impact of COVID restricted some of the activities targeted for completion in 2021. That notwithstanding, the following measures were taken:

1. Continued the collaborative work of the Modern Slavery Working Group. The Working group held a series of 13 meetings in 2022.
2. Further engaging with the Australian Catholic Anti-slavery Network (ACAN) and education providers who are participating entities within ACAN. The engagement was in the form of MSLO and Working Group members participating in the monthly teleconferences and supplementary webinars.
3. Engaging with the internal stakeholders of the organisation to seek their input in completion of the 2022 Modern Slavery Statement.
4. Following up suppliers on the on-boarding process through collaboration with Sedex.
5. Completion by 188 staff of eLearning Modern Slavery 101.
6. Inclusion of Modern Slavery clauses in CEDP contract templates for suppliers. This is in addition to the now standard inclusion of the clauses in CEDP's contract templates.
7. Purchase of a contract management tool following approval from CEDP Directors. This will address some requirements relating to Modern Slavery. For example...
8. Ratification of the contracts management policy.
9. Completion of data gathering and spend analysis to assist with performing the third Gap Analysis.

10. Completion of the 2022 ACAN Gap Analysis, identifying areas, identifying areas of improvement, areas that remained static and those requiring attention in 2023. These will be addressed in accordance with the Action Plans for 2023 and later years.

Modern Slavery Action Plan and Road Map

CEDP's Modern Slavery Action Plan and Road Map for 2023 and beyond are summarised under the headings "Our Outstanding Plans" and "Our Plans Beyond 2023". The action plans and road map focus on the following key areas:

1. Management systems.
2. Human resources and recruitment.
3. Customers and stakeholders.
4. Risk management.
5. Procurement.

Detailed timelines and responsibilities will be assigned to the relevant Business Units.

2022 Modern Slavery Risk Management Initiatives

In 2022, CEDP continued to work under the umbrella of the Australian Catholic Anti-Slavery Network (ACAN) towards eradicating modern slavery. ACAN continues to support participating entities in efforts to identify and manage modern slavery risks in their operations and supply chains. These efforts include:

1. Sharing resources and experience through team building;
2. Offering tailored education programs to member entities and their suppliers. In 2022, 188 staff completed Modern Slavery 101. This brings to 225 the number of modules completed since 2021.
3. Offering tailored webinars to suppliers of goods and services to member entities.
4. Provision of templates for policy and other documentation. These include the supplier code of conduct and modern slavery contract clauses;
5. Risk assessment;
6. Action planning; and
7. Completion of Modern Slavery Statements.
- 8.

This is the third Modern Slavery Statement completed as a compendium together with other ACAN entities. This statement covers the work that the Diocese of Parramatta performed in 2022. The focus for 2022 was on training of central office staff both from Chancery and Education on Modern Slavery, with specific emphasis on MS101 completion. 188 staff completed MS101 out of a total of 579 invited. In addition to training, the inclusion of modern slavery clauses in supplier agreement templates was made a standard requirement as has been the case with CEDP templates.

Following the 2021 invitation to suppliers to onboard Sedex, an additional 2 suppliers onboarded the platform in 2022. This brings to 10 the total number of CEDP's suppliers who have onboarded Sedex. Sedex is a membership organisation that provides online platforms for companies to

manage and improve working conditions in global supply chains².

Modern Slavery Working Group

The current Modern Slavery Working Group (the Working Group) draws representation from Chancery, Office of the Executive Director, Mission and Finance (Procurement).

The Working Group continued its regular meetings remotely in 2022 and was joined by a representative from ACAN on 14 July for the 2022 modern slavery activity planning.

Modern Slavery Policy, Procedures and Guidelines

The Working Group targeted engaging stakeholders in finalising the Modern Slavery Prevention Policy developed in 2020/21 and presenting it to Directors for ratification in 2021. This was not achieved in 2022 and is therefore scheduled for completion in 2023. The development of procedures and Guidelines have also been rescheduled to 2022. All documents will be presented to Directors for ratification in 2022.

Participation in Modern Slavery Supplier Webinars

CEDP was a participant in the ACAN organised webinar for uniform suppliers.

The purpose of the webinar was to help CEDP suppliers understand the following:

1. Business relevance and the Modern Slavery Act;
2. Catholic customer/buyer expectations;
3. Ways to access free modern slavery e-learning;
4. Sedex supplier membership; and
5. Domus 8.7 modern slavery specialist remediation services.

The Diocese of Parramatta was represented by four staff from Chancery, Mission and Procurement. Fifty suppliers were invited to attend.

eLearning

The Diocese continues to encourage staff to complete the ACAN Modern Slavery eLearning modules. In 2022, all 79 Chancery and 500 Central Office Staff 579 staff were invited to complete Modern Slavery 101. The table below shows the completion details. In consultation with Central Office's Training, Compliance and Accreditation Team, it was determined that invitations to attempt Modern Slavery 101 be restricted to Central Office Staff before rolling it out to schools at a later time.

² <https://www.sedex.com/>

The table below shows the number of completions for Modern Slavery 101 in 2022.

	Staff Invited	Staff registered for completion	Completions	Completion Rate as % of Staff Invited
Chancery ³	79	79	79	100%
Central Office	500	135	109	22%

The table below shows the cumulative number of completions by module.

eLearning Module	Description	Number of Completions
ACAN-Modern Slavery 101	Provides a comprehensive overview of modern slavery and worker vulnerability. Goods linked to modern slavery through harvesting, processing, or mining or raw materials; sourcing components for electronics or furniture; and the manufacture and distribution of products are highlighted. Service sector risks including cleaning, security and hospitality sectors.	194
ACAN-Implementing a Modern Slavery Risk Management Program	Provides a comprehensive overview on how to develop and implement a modern slavery risk management program including focused on: Commitment and Leadership, Gap analysis and Action planning, Supplier Risk and Building Staff Capabilities.	15

³ Launched Modern Slavery 101 as a professional learning course for Central Office and Chancery staff.

ACAN-Business Relevance	Outlines responsibilities of businesses to respect human rights and the key economic, legislative and stakeholder drivers to manage risk. A review of relevant modern slavery criminal offences and key reporting requirements of the <i>Modern Slavery Act 2018</i> (Cth) are included.	16
Total Completions		225

Our Staff Allocation

Our staff allocation is summarised in the tables below:

2022 Staff Allocation Chancery

	Fulltime	Part-time	Casual	Total
Male	26	0	8	34
Female	30	15	11	56
Total	56	15	19	90

2022 Staff Allocation DDF

	Fulltime	Part-time	Casual	Total
Male	4	1	0	5
Female	2	1	0	3
Total	6	2	0	8

Staff Allocation CEDP

	Fulltime	Part-time	Casual	Total
Male	933	199	72	1,204
Female	2,486	1,736	350	4,572
Total	3,419	1,935	422	5,776

Remediation

A documented remedy pathway is an important requirement of the Modern Slavery Act.

Through the ACAN Program, CEDP agencies have access to the expertise and independent advice available through Domus 8.7. CEDP agencies or parishes can make referrals of people impacted by modern slavery to obtain support, advice and guidance on how to respond to concerns.

The right to remedy is a basic principle in international human rights law. The provision of remedy involves a business implementing actions and processes to investigate and redress negative impacts on people involved in business operations and supply chains, and ensure future incidents are prevented.

Domus 8.7 principles:

1. Independent advice and support
2. Ensuring people impacted are safe and protected
3. Any work undertaken is with the full knowledge and consent of people impacted
4. Human rights based approach

Domus 8.7 overview:

1. A vital service and key element of the ACAN Program
2. Addresses a key mandatory reporting requirement of the MSA
3. Provides the support needed for a rapid, coordinated response when victims are identified
4. Develops the internal capability to manage risk and engage staff
5. Establishes a documented process to manage complex humanitarian issues
6. Upholds Catholic Social Teaching
7. Ensures ongoing commitment to protecting the human rights of people in operations and supply chains.

Domus 8.7 service profile:

1. Guidance and advice for entities who identify slavery
2. Coordination with government agencies, victim support organisations and others
3. Develop internal capabilities to manage modern slavery risk
4. Confidential independent grievance mechanism to report suspected incidents of modern slavery
5. Practical and timely support for people impacted by modern slavery

Our 2022 Completed and Outstanding Plans

Some action plans intended for 2021 and 2022 are outstanding. The Diocese will consider allocating a resource with key focus on Modern Slavery to focus on these plans during 2023 and in subsequent years, whilst consolidating the gains made so far and reported in the 2020 and 2021 statements. Focus will initially be set on Management Systems Action Plans for 2021. These are:

Management Systems Action Plan 2022			
Topic	Action required in 2021	Action taken in 2022	Outstanding Action
Governance	Establish governance framework for managing modern slavery risks.	Ongoing through completion of Policy Procedures and Guidelines to be presented to Directors for ratification in 2022.	Complete draft Policy, Procedures and Guidelines and present to Board for ratification in 2023.
Commitment	Educate senior management on modern slavery risks and legislative requirements – as above, Procurement Policies/Procedures.	Rolled out MS101 to 579 staff. There was a 32% completion rate.	As above. Raise completion rate for management and Central Office staff.
Actions Taken	Engage key business units and stakeholders to implement priority actions.	Ongoing.	As above.

Risk Management Action Plan 2022			
Topic	Action required in 2022	Action taken	Outstanding Action
Risk Framework	Develop team and process to commence action planning	MS Working Group comprises staff from Chancery and Education (Mission and Procurement). Identified areas of focus by Chancery (Parishes); Mission (Schools) and Procurement (suppliers and Central Office staff).	Plan approach to engaging each area identified, i.e., Parishes, Schools, suppliers and Central Office staff.

Procurement Action Plan 2022			
Topic	Action required in 2022	Action taken	Outstanding Action
Screening and Traceability	Identify and undertake mapping of Tier 1 suppliers (initially) and Tier 2 where resources allow.		Mapping to be carried out in 2023.

Our Plans Beyond 2022

In addition to the outstanding action items mentioned above, the Diocese intends to undertake the following steps beyond 2023.⁴

Management Systems Action Plan 2023 and Beyond	
Topic	Actions
Commitment	<ul style="list-style-type: none"> ● Showcase the actions taken to address modern slavery risks across industry networks
Business Systems	<ul style="list-style-type: none"> ● Engage key internal stakeholders to review existing business processes
	<ul style="list-style-type: none"> ● Review existing business systems against the requirements of modern slavery legislation
	<ul style="list-style-type: none"> ● Integrate modern slavery risk management into existing business systems
	<ul style="list-style-type: none"> ● Integrate modern slavery risk management into supplier review processes
Actions Taken	<ul style="list-style-type: none"> ● Ensure elements of modern slavery risk management systems are reflected across the business
	<ul style="list-style-type: none"> ● Establish goals, targets and KPIs to effectively address modern slavery risks

⁴Should the Diocese accomplish any of the items scheduled beyond 2023, they will be included in the 2023 Statement.

	<ul style="list-style-type: none"> ● Monitor the effectiveness of actions to directly reduce the incidents of modern slavery in operations & supply chain
<p>Monitor and Report</p>	<ul style="list-style-type: none"> ● Undertake a review of modern slavery risks in your industry sector
	<ul style="list-style-type: none"> ● Identify opportunities for leadership on modern slavery data collection and reporting processes
	<ul style="list-style-type: none"> ● Integrate modern slavery risk findings into monthly management reports
	<ul style="list-style-type: none"> ● Expand data collection process to include modern slavery data from national and international sources
	<ul style="list-style-type: none"> ● Continuous improvement

Human Resources and Recruitment Action Plan 2023 and Beyond	
Topic	Actions
Awareness	<ul style="list-style-type: none"> ● Incorporate modern slavery information into induction programs
Policies and Systems	<ul style="list-style-type: none"> ● Incorporate modern slavery risk management specific responsibilities into position descriptions
Policies and Systems	<ul style="list-style-type: none"> ● Encourage lowering tolerance approach to modern slavery among all staff and contractors
Training	<ul style="list-style-type: none"> ● Incorporate modern slavery awareness training into induction programs
Labour Hire & Outsourcing	<ul style="list-style-type: none"> ● Incorporate measures to manage modern slavery risk in outsourcing and labour hire contracts
Labour Hire & Outsourcing	<ul style="list-style-type: none"> ● Assess labour hire contractors and outsourcing programs for modern slavery risk. <ul style="list-style-type: none"> ○ Individual Schools ○ HR and Facilities
Labour Hire & Outsourcing	<ul style="list-style-type: none"> ● Regularly review and update hiring and on- boarding processes

Customers and Stakeholder Action Plan 2023 and Beyond	
Topic	Actions
Attitude	<ul style="list-style-type: none"> ● Develop curriculum appropriate to <u>stage</u> around the issue. <ul style="list-style-type: none"> ○ Parent ○ Teacher
Feedback Mechanisms	<ul style="list-style-type: none"> ● Train staff and stakeholders on modern slavery feedback mechanisms, using appropriate reporting systems
	<ul style="list-style-type: none"> ● Establish systems and processes to evaluate and take immediate action on feedback received
	<ul style="list-style-type: none"> ● Establish stand-alone confidential modern slavery hotline for staff and contractors
	<ul style="list-style-type: none"> ● Engage external third- party labour-rights auditors to validate worker voice data

Worker Voice	<ul style="list-style-type: none">● Run pilot project worker voice program for high-risk suppliers
	<ul style="list-style-type: none">● Implement worker voice data collection and reporting system
	<ul style="list-style-type: none">● Review worker voice data collection options for at-risk workers in the supply chain
	<ul style="list-style-type: none">● Develop a comprehensive modern slavery remediation program that is well resourced and supported

Risk Management Action Plan 2023 and Beyond	
Topic	Actions
Risk Framework	<ul style="list-style-type: none"> ● Educate stakeholders in the concepts of Modern Slavery and how it impacts upon our work
	<ul style="list-style-type: none"> ● Establish systems and processes to evaluate and take immediate action on identified risks
	<ul style="list-style-type: none"> ● Include modern slavery risk review into risk management policies and procedures
	<ul style="list-style-type: none"> ● Incorporate modern slavery risk assessment into existing risk framework
Operational Risk	<ul style="list-style-type: none"> ● Map operations against potential risks of modern slavery or Exploitation
	<ul style="list-style-type: none"> ● Develop action plan to address risks of modern slavery in internal operations
	<ul style="list-style-type: none"> ● Enhance internal capacity to identify and manage operational risks
	<ul style="list-style-type: none"> ● Implement actions to mitigate or eliminate operational risks
	<ul style="list-style-type: none"> ● Implement a due diligence process to continuously identify, manage and mitigate modern slavery risks

External Risk	<ul style="list-style-type: none"> • Develop risk management plan to address modern slavery risks among priority suppliers
	<ul style="list-style-type: none"> • Undertake modern slavery risk review of priority direct (Tier 1) suppliers
	<ul style="list-style-type: none"> • Assign resources to identify, prioritise and manage operational and supply chain risks
	<ul style="list-style-type: none"> • Map modern slavery risks and vulnerabilities along extended supply chain
	<ul style="list-style-type: none"> • Develop and monitor implementation of corrective action plans
Monitor & Report	<ul style="list-style-type: none"> • Identify opportunities to monitor and report on modern slavery risks
	<ul style="list-style-type: none"> • Develop procedures to effectively report and act where modern slavery risks are identified
	<ul style="list-style-type: none"> • Integrate modern slavery risk management into business evaluation and reporting processes
	<ul style="list-style-type: none"> • Integrate modern slavery risk reporting with stakeholder feedback mechanisms
	<ul style="list-style-type: none"> • Transparently report on modern slavery risks- both internally and externally

Procurement and Supply Chain Action Plan 2023 and Beyond	
Topic	Actions
Contract Management	<ul style="list-style-type: none"> ● Incorporate performance standards and contract evaluation criteria for high-risk contracts <hr/> <ul style="list-style-type: none"> ● Conduct desktop review of high-risk suppliers
Screening and Traceability	<ul style="list-style-type: none"> ● Undertake mapping of Tier 1 suppliers (initially) and Tier 2 where resources allow (continuation of 2021 activities)
Monitor & Corrective Action	<ul style="list-style-type: none"> ● Establish a supplier monitoring program through Sedex <hr/> <ul style="list-style-type: none"> ● Develop a monitoring system to assess ongoing performance (Sedex) <hr/> <ul style="list-style-type: none"> ● Develop corrective action plans to address modern slavery risks among high-risk suppliers <hr/> <ul style="list-style-type: none"> ● Work with suppliers to identify gaps and address barriers to implementation

Reporting Criteria 5: Effectiveness Assessment

Modern Slavery Gap Analysis

ACAN Gap Analysis is an online tool to assist organisations to track and manage internal response and preparedness to identify, respond and mitigate the risk of modern slavery. CEDP completed its first Gap Analysis as part of the July 2019 Catholic Modern Slavery Conference and has been conducting the assessment annually to track the progress of improving systems in CEDP. The latest Gap Analysis for 2022, presented below alongside those for 2021. The table shows 18 areas where CEDP has improved or maintained system improvements with 4 areas showing a backwards trend. This is due to the delayed improvement initiatives by Directorates.

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

The table below demonstrates the effectiveness of work performed in 2022, showing areas requiring further work in 2023.

INTERNAL / STAFF	2020	2021	2022
Modern Slavery Working Groups (MSWGs) meetings	4	8	10
E-learning modules completed	17	37	210
Sedex Individual user accounts	*	*	2
Number of staff trained	*	*	206
EXTERNAL / SUPPLIER ENGAGEMENT			
Total number of suppliers	4480	5000	5400
Contract templates include MS clause[2]	4	7	Now requesting MS clauses in supplier templates, in addition to having them in the Diocese's own templates.
Suppliers in high-risk procurement categories	*	*	32
Communication to suppliers on Modern Slavery	0	50	173
Number of ACAN Pre-Assessment Surveys completed	*	*	20
Suppliers attending capacity building webinars	*	*	2
Suppliers identified as not requiring to join Sedex	*	*	0
Suppliers Invited to join Sedex	0	50	53
Suppliers joining Sedex but not linked to Diocese	*	*	2
Suppliers linked to Diocese on Sedex	*	15	0
Suppliers with Sedex SAQ completed & Risk score generated	0	7	2
Cumulative suppliers with high Sedex SAQ risk rate	*	*	0

Cumulative suppliers with medium Sedex SAQ risk rate	*	*	1
Cumulative suppliers with low Sedex SAQ risk rate	*	*	9
E-learning modules completed by suppliers	0	0	0
Number of social audits completed	*	*	0
Number of corrective actions from social audits	*	*	0
DOMUS 8.7 EXTERNAL REFERRALS			
Worker voice / grievance mechanism deployed		*	*
Referrals for advice and assistance		*	*
Individuals identified or referred for modern slavery assessment		*	*
Individuals with modern slavery cases remediated		*	*

* Metric not available in reporting period.

As in the last 2 years, the effectiveness of the work performed around modern slavery will continue to be measured against the following criteria:

Processes to review actions	The process of completing the Modern Slavery Statement each year will be used to review the actions of those Business Units who will complete the statement
Risk assessment	Using the GAP analysis with each Business Unit on a yearly basis for inclusion in the statement will highlight the areas of risk for the organisation
Engagement and feedback	The Modern Slavery Working Group will engage each Business Unit for the purpose of completing the Statement and provide appropriate feedback regarding review of actions and risk to each
Internal audit	Governance, Risk and Strategy will undertake the normal internal audit of the organisation
Tracking implementation	Regular feedback from the Modern Slavery Working Group will track implementation of the action plan
Supplier tracking	Procurement will continue to work with suppliers in this area

ACAN Calendar Events 2023:

Date	Time	Webinar
Wednesday, 8 March 2023	12:20pm-1pm AEST/ADST	<u>ACAN Supplier Webinar: Construction and Capital works</u>
Wednesday, 10 May 2023	12:20pm-1pm AEST/ADST	<u>ACAN Supplier Webinar</u>
Wednesday, 12 July 2023	12:20pm-1pm AEST/ADST	<u>ACAN Supplier Webinar: Goods manufactured overseas</u>
Wednesday, 13 September 2023	12:20pm-1pm AEST/ADST	<u>ACAN Supplier Webinar: Worker voice</u>
Wednesday, 11 October 2023	12:20pm-1pm AEST/ADST	<u>ACAN Supplier Webinar: Labour related services</u>
Wednesday, 8 November 2023	12:20pm-1pm AEST/ADST	<u>ACAN Supplier Webinar</u>



ACAN Risk Management Program 1 July 2023 to 30 June 2026

Modern Slavery Act 2018

The Australian Modern Slavery Act (Cth) 2018 (the **Act**) requires businesses and not-for-profits to take effective measures to assess, address and mitigate the risk of modern slavery to workers in supply chains and operations.

The Act requires annual reporting of activities and actions taken during the reporting year. The annual Modern Slavery Statement must address seven mandatory reporting criteria, including measuring the effectiveness of actions taken and demonstrating continuous improvement.

A senior representative of the highest governing body of the reporting entity (Chair of the Board or Bishop) must sign the Modern Slavery Statement and include the date of formal approval. Statements are published on the [Australian Government's Online Register for Modern Slavery Statements](#).

ACAN Risk Management Program

The major exposure to modern slavery for the Church in Australia is related to procurement decisions - to the buying of goods and services. In response to the Act, Catholic reporting entities participate in the Australian Catholic Anti-slavery Network (ACAN) Modern Slavery Risk Management Program.

The professional services, modern slavery expertise, tools and resources provided by ACAN Program Managers supports Catholic entities to achieve regulatory compliance in a systematic manner.

The ACAN Program anticipates the evolving needs of entities as response matures from policy to embedding practice across the procurement lifecycle. Fostering capability of staff to implement processes to identify and mitigate modern slavery and sustainability risks, is a substantial board and management undertaking.

Actions to address modern slavery risk, implementing corrective action and reporting obligations are highly complex, requiring more resources over coming years as the regulatory landscape continues to evolve. The ACAN Program anticipates additional content and deliverables to meet any future amendments in response to the 2023 legislative review of the Act.

The size and scope of the ACAN collaboration also creates opportunities to leverage engagement and impact with all stakeholders. This can create efficiencies (including savings) in procurement and promotes ethical and sustainable business management practices within Catholic entities.

The Act requires reporting entities to demonstrate continuous improvement and measure effectiveness. To this end, Program Managers will continue to coordinate services and the delivery of the ACAN Program 2023 – 2026 enhanced with over 70 deliverables.

Catholic Modern Slavery Statements are submitted together, as a Compendium of individual statements, to the Australian Government's Online Register for Modern Slavery Statements.

This proposal outlines the ACAN Program scope of work accompanied by terms and conditions for consideration by each Participating Entity of ACAN.

ACAN Program Scope of Work 2023 - 2026

Definitions

- Modern Slavery Act 2018 (Cth) **(the Act)**
- Australian Catholic Anti-Slavery Network **(ACAN)**
- ACAN Modern Slavery Risk Management Program **(ACAN Program)**
- ACAN Program is administered by the Catholic Archdiocese of Sydney **(ACAN Program Managers)**
- Entity that participate in the ACAN Program **(Participating Entity)**
- ACAN Program contact officer for each Participating Entity's Modern Slavery Liaison Officer **(MSLO)** and Modern Slavery Working Group **(MSWG)**
- Participating Entity's annual financial contribution towards the cost of the 2023-2026 ACAN Program **(Contribution)**
- Catholic Archdiocese of Sydney **(CAS)** facilitates the ACAN Program and directly employs the ACAN Program Managers
- Online portal **(Portal)** for use by each Participating Entity to access resources and tools.

A. Services provided by ACAN Program Managers:

1. Annual action planning session with individual Participating Entity's MSWG.
2. Participation in MSWG meetings.
3. Responding to requests and queries from MSLOs, MSWGs, boards and peak bodies.
4. Issues management.
5. Advice on direction, decisions, and process.
6. Insights and special requests.
7. Crisis management and common supplier engagement.
8. Awareness-raising and participation in events, recommendation of guest speakers and customised presentations.
9. Monthly ACAN Program webinars.
10. Supplementary capacity building webinars.
11. Generate ACAN monthly newsletter.
12. Facilitate access to a network of peers and sector-based shared learning.
13. Technical assistance for user access to the Portal, e-learning management system.
14. Onboarding of new entities commencing the ACAN Program.
15. Comprehensive orientation session and ongoing support for new MSLOs and MSWGs.
16. Develop model framework for engaging labour related services in operations.

Supplier Engagement and Management:

17. Supplier survey and analysis (Participating Entity's existing suppliers).
18. Reports and performance tracking of supplier engagement.
19. On-demand supplier specific research.
20. On-demand engagement with high-risk ACAN suppliers.
21. Assess and engage with prospective suppliers for the ACAN Pre-qualification Register.
22. Webinar series to build capacity of suppliers.

ACAN Sustainability Stream: Laudato Si Goals & Decree 8

23. Develop a correlation matrix between Laudato Si Goals, Decree 8, ESG and SDGs.
24. Mapping and periodic reporting of available metrics (Sedex).
25. Additional resources to address Laudato Si Goals and Decree 8.
26. Facilitation of sustainability gap analysis.
27. Model Materiality Assessment aligned to Laudato Si Goals and Decree 8.
28. Model Risk Assessment aligned to Laudato Si Goals and Decree 8.

29. Model Action Plan aligned to Laudato Si Goals and Decree 8.

Modern Slavery Statement Review

- 30. Provision of data for individual Participating Entity's annual Modern Slavery Statement.
- 31. Detailed guidance on Statement format, content, authorisation and timing.
- 32. Formal and systematic review of draft Statement and ACAN content recommendations.
- 33. Assess for compliance with legislative reporting requirements.

Compendium of Catholic Modern Slavery Statements and ACAN Executive Summary

- 34. Develop and host Compendium survey.
- 35. Analyse and aggregate survey data.
- 36. Compile Executive Summary and supporting information.
- 37. Data analysis, infographics, graphic design & case studies.
- 38. Coordination and submission of Statement to the Government Register.
- 39. Printing and distribution of Executive Summary.

B. Sedex: Supplier ethical sourcing platform

- 40. Sedex sub-account and unlimited access to the Sedex platform, including:
 - i. access to Sedex's inherent risk information – country, sector and commodity risk globally across 4 pillars (health and safety, business ethics, labour standards, environment);
 - ii. dashboards and visualisation of whole of supply chain risk information and analysis;
 - iii. site specific risk assessment (including self-assessment questionnaires) and audit information (over 93,000 audits, subject to supplier consent);
 - iv. use of the Sedex SMETA audit methodology for internal and external use;
 - v. Sedex's phone and email support for suppliers in 13 languages globally;
 - vi. Access to Sedex's e-learning material to support capacity building for unlimited users;
 - vii. Access to Sedex's training and events for unlimited users to promote learning and collaboration.
- 41. On demand analysis of Sedex Self-Assessment Questionnaire (SAQ) results and recommendations including modern slavery, social compliance, business ethics, environment and management controls.
- 42. Supplier on-boarding to Sedex.
- 43. Facilitation, training and support for the use of Sedex.

C. Access to ACAN Program tools and resources:

Internal Resources

- 44. Video recordings of webinars and presentation slides.
- 45. Modern Slavery Action Plans for education, social services, health and aged care.
- 46. ACAN Program implementation flowchart.
- 47. Sedex supplier assessment flowchart.
- 48. Policy templates (including Modern Slavery, Ethical Sourcing, Sustainability, Environment and Ecology).
- 49. Category Risk Taxonomy & Assessments (Modern Slavery and Sustainability).
- 50. Gap Analysis guide.
- 51. Supplier Prequalification Register.
- 52. Annual ACAN Compendium of Modern Slavery Statements commencing 2020.

Internal Engagement

- 53. Support for MSWG:
 - a. Terms of Reference, Roles and Responsibilities and Appointment letter.
- 54. Presentation slides, video and governance resources for boards.
- 55. Presentation slides, videos and surveys for staff.

56. Resources for People and Culture – job description, new employee induction.

Supplier Engagement Resources

57. Communication templates for supplier engagement.

58. Supplier code of conduct.

59. Supplier contract clauses.

60. Model supplier engagement strategy and flowchart.

61. Supplier engagement tools such as video recordings, presentation and surveys.

E-learning

62. Access to modern slavery e-learning modules via a learning management system (LMS).

63. E-learning modules:

- i. Sustainability e-learning module, linking to Laudato Si education and ESG.
- ii. Industry specific modules such as cleaning and construction.
- iii. CDP online modules for example: social workers, nurses and legal officers.
- iv. “Modern Slavery 101”.
- v. “Business relevance”.
- vi. “Implementing a Modern Slavery Risk Management ACAN Program”.
- vii. “Modern Slavery Risk Management for Suppliers”.
- viii. “Grievance Mechanisms and Remedy”.

64. E-learning communication templates and training materials.

65. Access to e-learning files for deployment to Participating Entity’s learning management system.

66. E-learning user access management.

67. Provision of user learning data for reporting purposes.

D. Remediation – Domus 8.7

Domus 8.7 is a service for the Participating Entity and is part of the ACAN Program.

A documented remedy pathway is a legislative requirement under Section 16 (1) (d) of the Act. The provision of a remedy pathway involves a business implementing actions and processes to investigate and redress negative impacts on people involved in business operations and supply chains, and ensure future incidents are prevented.

Domus 8.7 emphasises Catholic Social Teaching and ensures ongoing commitment to protecting the human rights of people in operations and supply chains.

Through Domus 8.7 services, the Participating Entity has access to:

68. Confidential, independent support, advice and guidance on how to respond to concerns in operations or supply chains.

69. Practical and timely support for people impacted and a coordinated response when victims are identified.

70. Confidential independent grievance mechanism to investigate suspected incidents.

71. A documented process to manage potentially complex humanitarian issues.

72. A pathway to addresses a key mandatory reporting requirement of the Act.

E. Additional Services:

The ACAN Participating Entity may request additional services that are outside the ACAN Program. On request, a quote for the scope of additional services will be provided to the Participating Entity and must be accepted by the Participating Entity prior to the commencement of additional services.

Additional services provided by ACAN Program Managers include, but are not limited to, the following examples:

- i. Coordination and preparation of Supplier Audits (integrated audits including sustainability, human rights, environmental, health and safety, pay and conditions, due diligence) with reputable certification bodies. Results to inform corrective actions and track progress.
- ii. Secondment of personnel to the Participating Entity for number of days to work on a specific project.
- iii. Access to a third party due diligence screening tool, for detailed supplier background information such as sanctioned individuals, corruption, money laundering and adverse media.

F. ACAN Advocacy

Acknowledgement as a Participating Entity on ACAN website, reports and other communications
Representation by ACAN to Government, business and industry associations. ACAN representation in government forums:

- National Roundtable on People Trafficking and Slavery.
- Modern Slavery Act 2018 legislative review process.
- National Action Plan 2024 review.
- Attorney General's Department & Home Affairs.
- Ambassador for People Trafficking and Modern Slavery.
- State governments as required.
- NSW Anti-slavery Commissioner.

G. ACAN Program is supported by various platforms and software for example:

- | | |
|---|---|
| a. Sedex | e. Event registration system |
| a. Gap Analysis | f. Learning Management System |
| b. Worker Voice Mechanism | g. EDM and CRM administration |
| c. ACAN website and password protected Portal | h. Video and file sharing platforms |
| d. Survey tool | i. Social media – LinkedIn and Facebook |

**ACAN Modern Slavery Risk Management Program
Terms and Conditions from 1 July 2023 to 30 June 2026**

The ACAN Program equips a Participating Entity with the activities, services, resources and tools to prepare its annual Modern Slavery Statement, under the Act.

Through the ACAN Program Managers, CAS will continue to coordinate the delivery of the ACAN Program through the provision of:

- Subject-matter expertise for the development of the ACAN Program.
- Regular communications and administrative support to the Participating Entity.
- Engagement with the Commonwealth Government, other authorities and stakeholders.

“ACAN Program” refers to provision of services under the ACAN Program from the date of execution to the Participating Entity of the 2023-2026 ACAN Program Terms and Conditions below to 30 June 2026.

ACAN Program 2023-2026 Terms and Conditions

General

1. The 2023-2026 ACAN Program commences on the date of execution of these 2023-2026 ACAN Program Terms and Conditions until 30 June 2026.
2. Details of the 2023-2026 ACAN Program are set out in the 2023-2026 ACAN Program Scope of Work above.
3. In order to participate in the 2023-2026 ACAN Program, the Participating Entity must:
 - a. provide to CAS the 2023-2026 ACAN Program Terms and Conditions as completed and signed by the duly authorised representative of the Participating Entity;
 - b. pay the Participating Entity’s annual financial contribution towards the cost of the 2023-2026 ACAN Program (**Contribution**) excl GST by 31 July 2023, 31 July 2024 and 31 July 2025.
4. The Participating Entity must provide the details of its nominated Modern Slavery Liaison Officer (**MSLO**) as its duly authorised representative to participate in the 2023-2026 ACAN Program.
5. If for any reason the 2023-2026 ACAN Program cannot be commenced or is not capable of continuing as planned in any respect, CAS may cancel or amend the 2023-2026 ACAN Program. If CAS cancels the 2023-2026 ACAN Program, or any aspect of the 2023-2026 ACAN Program, the Participating Entity will receive a partial refund of its Contribution, less any cost already incurred under the 2023-2026 ACAN Program up to the date of cancellation.
6. The laws of New South Wales, Australia, govern these 2023-2026 ACAN Program Terms and Conditions.

Intellectual Property

7. CAS will provide an online portal (**Portal**) for use by each Participating Entity to access resources, tools, and training materials in the 2023-2026 ACAN Program. The Participating Entity acknowledges that all intellectual property rights in the Portal and the content within the Portal, are owned by CAS. To the extent that a Participating Entity has any intellectual property rights in the content within the Portal, the Participating Entity fully assigns those intellectual property rights to CAS.
8. CAS grants to the Participating Entity a royalty free (except for the Contribution), perpetual, irrevocable, non-exclusive non-assignable licence to use, reproduce, adapt and modify content posted on the Portal for purposes of that Participating Entity’s preparation of a Modern Slavery Statement and associated training and activities. The licence is valid for the period that the Participating Entity’s Contribution to the ACAN Program has been paid in full by the relevant deadline

Supplier risk management platform

9. CAS will provide each Participating Entity with a subscription to a supplier risk management platform (**Sedex**) to facilitate online management and information exchange (**Information Exchange**) between each Participating Entity and businesses that supply or trade with the Participating Entity. Examples of information exchanged on Sedex include supplier chain mapping, supplier risk assessments and analysis, and audit reports on supply chain performance. As CAS is the direct contracting party with Sedex and effectively responsible for Participating Entity’s use of Sedex, it is necessary to ‘back to back’ obligations with the Participating Entity. Against this background, each Participating Entity indemnifies CAS in respect of all liabilities, costs, expenses, fines, damages and costs (including but not limited to any direct, indirect or consequential losses, loss of profit, loss of

reputation and all interest, penalties and legal costs (calculated on a full indemnity basis) and all other reasonable professional costs and expenses) suffered or incurred by CAS arising out of or in connection with the Participating Entity's use of Sedex.

Confidentiality and privacy

- 10. CAS will keep confidential any confidential information provided to it by the Participating Entity under the 2023-2026 ACAN Program.
- 11. The Participating Entity will keep confidential any confidential information of CAS or of any other Participating Entity.
- 12. CAS collects information (including the MSLO's contact details (such as phone number, email address, position/title), and details of employee training for use in the LMS and for the purpose of the 2023-2026 ACAN Program. The personal information collected will be treated in accordance with CAS' Privacy Policy, a copy of which can be found at <https://www.sydneycatholic.org/terms-and-conditions/#privacy>

Annual cost per Participating Entity to join the 2023-2026 ACAN Program	
The Participating Entity will be issued an annual invoice on 1 July 2023, 2024 and 2025	
Under \$100 million	\$5,000
Between \$100 million and \$250 million annual consolidated revenue	\$12,500
Between \$250 million and \$500 million annual consolidated revenue	\$18,500
Between \$500 million and 1 billion annual consolidated revenue	\$28,500
Over \$1 billion annual consolidated revenue	\$48,000
Optional Additional Contribution <i>(Additional ACAN Social Audits and Participating Entity referral pathway development and capacity building. This option is provided at the specific request of some Catholic organisations) Based on annual consolidated revenue x 0.00011 capped at \$75k.</i>	

Please email a signed and completed copy of page 8 to: info@acan.org.au

<u>Details of Participating Entity:</u>	
Name of Participating Entity:	
ABN of Participating Entity:	
Insert amount to be invoiced:	
<u>Contact details of nominated MSLO</u>	
Name of MSLO:	
Position/Title:	
Email:	
Website:	
Work ph:	

Acceptance by duly authorised representative

I am the duly authorised representative of the Participating Entity named above and on behalf of the Participating Entity, accept the 2023-2026 ACAN Program Terms and Conditions.

Signature: _____

Name: _____

Position/title: _____

Date: _____



ACAN Risk Management Program 1 July 2023 to 30 June 2026

Modern Slavery Act 2018

The Australian Modern Slavery Act (Cth) 2018 (the **Act**) requires businesses and not-for-profits to take effective measures to assess, address and mitigate the risk of modern slavery to workers in supply chains and operations.

The Act requires annual reporting of activities and actions taken during the reporting year. The annual Modern Slavery Statement must address seven mandatory reporting criteria, including measuring the effectiveness of actions taken and demonstrating continuous improvement.

A senior representative of the highest governing body of the reporting entity (Chair of the Board or Bishop) must sign the Modern Slavery Statement and include the date of formal approval. Statements are published on the [Australian Government's Online Register for Modern Slavery Statements](#).

ACAN Risk Management Program

The major exposure to modern slavery for the Church in Australia is related to procurement decisions - to the buying of goods and services. In response to the Act, Catholic reporting entities participate in the Australian Catholic Anti-slavery Network (ACAN) Modern Slavery Risk Management Program.

The professional services, modern slavery expertise, tools and resources provided by ACAN Program Managers supports Catholic entities to achieve regulatory compliance in a systematic manner.

The ACAN Program anticipates the evolving needs of entities as response matures from policy to embedding practice across the procurement lifecycle. Fostering capability of staff to implement processes to identify and mitigate modern slavery and sustainability risks, is a substantial board and management undertaking.

Actions to address modern slavery risk, implementing corrective action and reporting obligations are highly complex, requiring more resources over coming years as the regulatory landscape continues to evolve. The ACAN Program anticipates additional content and deliverables to meet any future amendments in response to the 2023 legislative review of the Act.

The size and scope of the ACAN collaboration also creates opportunities to leverage engagement and impact with all stakeholders. This can create efficiencies (including savings) in procurement and promotes ethical and sustainable business management practices within Catholic entities.

The Act requires reporting entities to demonstrate continuous improvement and measure effectiveness. To this end, Program Managers will continue to coordinate services and the delivery of the ACAN Program 2023 – 2026 enhanced with over 70 deliverables.

Catholic Modern Slavery Statements are submitted together, as a Compendium of individual statements, to the Australian Government's Online Register for Modern Slavery Statements.

This proposal outlines the ACAN Program scope of work accompanied by terms and conditions for consideration by each Participating Entity of ACAN.

ACAN Program Scope of Work 2023 - 2026

Definitions

- Modern Slavery Act 2018 (Cth) **(the Act)**
- Australian Catholic Anti-Slavery Network **(ACAN)**
- ACAN Modern Slavery Risk Management Program **(ACAN Program)**
- ACAN Program is administered by the Catholic Archdiocese of Sydney **(ACAN Program Managers)**
- Entity that participate in the ACAN Program **(Participating Entity)**
- ACAN Program contact officer for each Participating Entity's Modern Slavery Liaison Officer **(MSLO)** and Modern Slavery Working Group **(MSWG)**
- Participating Entity's annual financial contribution towards the cost of the 2023-2026 ACAN Program **(Contribution)**
- Catholic Archdiocese of Sydney **(CAS)** facilitates the ACAN Program and directly employs the ACAN Program Managers
- Online portal **(Portal)** for use by each Participating Entity to access resources and tools.

A. Services provided by ACAN Program Managers:

1. Annual action planning session with individual Participating Entity's MSWG.
2. Participation in MSWG meetings.
3. Responding to requests and queries from MSLOs, MSWGs, boards and peak bodies.
4. Issues management.
5. Advice on direction, decisions, and process.
6. Insights and special requests.
7. Crisis management and common supplier engagement.
8. Awareness-raising and participation in events, recommendation of guest speakers and customised presentations.
9. Monthly ACAN Program webinars.
10. Supplementary capacity building webinars.
11. Generate ACAN monthly newsletter.
12. Facilitate access to a network of peers and sector-based shared learning.
13. Technical assistance for user access to the Portal, e-learning management system.
14. Onboarding of new entities commencing the ACAN Program.
15. Comprehensive orientation session and ongoing support for new MSLOs and MSWGs.
16. Develop model framework for engaging labour related services in operations.

Supplier Engagement and Management:

17. Supplier survey and analysis (Participating Entity's existing suppliers).
18. Reports and performance tracking of supplier engagement.
19. On-demand supplier specific research.
20. On-demand engagement with high-risk ACAN suppliers.
21. Assess and engage with prospective suppliers for the ACAN Pre-qualification Register.
22. Webinar series to build capacity of suppliers.

ACAN Sustainability Stream: Laudato Si Goals & Decree 8

23. Develop a correlation matrix between Laudato Si Goals, Decree 8, ESG and SDGs.
24. Mapping and periodic reporting of available metrics (Sedex).
25. Additional resources to address Laudato Si Goals and Decree 8.
26. Facilitation of sustainability gap analysis.
27. Model Materiality Assessment aligned to Laudato Si Goals and Decree 8.
28. Model Risk Assessment aligned to Laudato Si Goals and Decree 8.

29. Model Action Plan aligned to Laudato Si Goals and Decree 8.

Modern Slavery Statement Review

- 30. Provision of data for individual Participating Entity's annual Modern Slavery Statement.
- 31. Detailed guidance on Statement format, content, authorisation and timing.
- 32. Formal and systematic review of draft Statement and ACAN content recommendations.
- 33. Assess for compliance with legislative reporting requirements.

Compendium of Catholic Modern Slavery Statements and ACAN Executive Summary

- 34. Develop and host Compendium survey.
- 35. Analyse and aggregate survey data.
- 36. Compile Executive Summary and supporting information.
- 37. Data analysis, infographics, graphic design & case studies.
- 38. Coordination and submission of Statement to the Government Register.
- 39. Printing and distribution of Executive Summary.

B. Sedex: Supplier ethical sourcing platform

- 40. Sedex sub-account and unlimited access to the Sedex platform, including:
 - i. access to Sedex's inherent risk information – country, sector and commodity risk globally across 4 pillars (health and safety, business ethics, labour standards, environment);
 - ii. dashboards and visualisation of whole of supply chain risk information and analysis;
 - iii. site specific risk assessment (including self-assessment questionnaires) and audit information (over 93,000 audits, subject to supplier consent);
 - iv. use of the Sedex SMETA audit methodology for internal and external use;
 - v. Sedex's phone and email support for suppliers in 13 languages globally;
 - vi. Access to Sedex's e-learning material to support capacity building for unlimited users;
 - vii. Access to Sedex's training and events for unlimited users to promote learning and collaboration.
- 41. On demand analysis of Sedex Self-Assessment Questionnaire (SAQ) results and recommendations including modern slavery, social compliance, business ethics, environment and management controls.
- 42. Supplier on-boarding to Sedex.
- 43. Facilitation, training and support for the use of Sedex.

C. Access to ACAN Program tools and resources:

Internal Resources

- 44. Video recordings of webinars and presentation slides.
- 45. Modern Slavery Action Plans for education, social services, health and aged care.
- 46. ACAN Program implementation flowchart.
- 47. Sedex supplier assessment flowchart.
- 48. Policy templates (including Modern Slavery, Ethical Sourcing, Sustainability, Environment and Ecology).
- 49. Category Risk Taxonomy & Assessments (Modern Slavery and Sustainability).
- 50. Gap Analysis guide.
- 51. Supplier Prequalification Register.
- 52. Annual ACAN Compendium of Modern Slavery Statements commencing 2020.

Internal Engagement

- 53. Support for MSWG:
 - a. Terms of Reference, Roles and Responsibilities and Appointment letter.
- 54. Presentation slides, video and governance resources for boards.
- 55. Presentation slides, videos and surveys for staff.

56. Resources for People and Culture – job description, new employee induction.

Supplier Engagement Resources

57. Communication templates for supplier engagement.

58. Supplier code of conduct.

59. Supplier contract clauses.

60. Model supplier engagement strategy and flowchart.

61. Supplier engagement tools such as video recordings, presentation and surveys.

E-learning

62. Access to modern slavery e-learning modules via a learning management system (LMS).

63. E-learning modules:

- i. Sustainability e-learning module, linking to Laudato Si education and ESG.
- ii. Industry specific modules such as cleaning and construction.
- iii. CDP online modules for example: social workers, nurses and legal officers.
- iv. “Modern Slavery 101”.
- v. “Business relevance”.
- vi. “Implementing a Modern Slavery Risk Management ACAN Program”.
- vii. “Modern Slavery Risk Management for Suppliers”.
- viii. “Grievance Mechanisms and Remedy”.

64. E-learning communication templates and training materials.

65. Access to e-learning files for deployment to Participating Entity’s learning management system.

66. E-learning user access management.

67. Provision of user learning data for reporting purposes.

D. Remediation – Domus 8.7

Domus 8.7 is a service for the Participating Entity and is part of the ACAN Program.

A documented remedy pathway is a legislative requirement under Section 16 (1) (d) of the Act. The provision of a remedy pathway involves a business implementing actions and processes to investigate and redress negative impacts on people involved in business operations and supply chains, and ensure future incidents are prevented.

Domus 8.7 emphasises Catholic Social Teaching and ensures ongoing commitment to protecting the human rights of people in operations and supply chains.

Through Domus 8.7 services, the Participating Entity has access to:

68. Confidential, independent support, advice and guidance on how to respond to concerns in operations or supply chains.

69. Practical and timely support for people impacted and a coordinated response when victims are identified.

70. Confidential independent grievance mechanism to investigate suspected incidents.

71. A documented process to manage potentially complex humanitarian issues.

72. A pathway to addresses a key mandatory reporting requirement of the Act.

E. Additional Services:

The ACAN Participating Entity may request additional services that are outside the ACAN Program. On request, a quote for the scope of additional services will be provided to the Participating Entity and must be accepted by the Participating Entity prior to the commencement of additional services.

Additional services provided by ACAN Program Managers include, but are not limited to, the following examples:

- i. Coordination and preparation of Supplier Audits (integrated audits including sustainability, human rights, environmental, health and safety, pay and conditions, due diligence) with reputable certification bodies. Results to inform corrective actions and track progress.
- ii. Secondment of personnel to the Participating Entity for number of days to work on a specific project.
- iii. Access to a third party due diligence screening tool, for detailed supplier background information such as sanctioned individuals, corruption, money laundering and adverse media.

F. ACAN Advocacy

Acknowledgement as a Participating Entity on ACAN website, reports and other communications
Representation by ACAN to Government, business and industry associations. ACAN representation in government forums:

- National Roundtable on People Trafficking and Slavery.
- Modern Slavery Act 2018 legislative review process.
- National Action Plan 2024 review.
- Attorney General's Department & Home Affairs.
- Ambassador for People Trafficking and Modern Slavery.
- State governments as required.
- NSW Anti-slavery Commissioner.

G. ACAN Program is supported by various platforms and software for example:

- | | |
|---|---|
| a. Sedex | e. Event registration system |
| a. Gap Analysis | f. Learning Management System |
| b. Worker Voice Mechanism | g. EDM and CRM administration |
| c. ACAN website and password protected Portal | h. Video and file sharing platforms |
| d. Survey tool | i. Social media – LinkedIn and Facebook |

**ACAN Modern Slavery Risk Management Program
Terms and Conditions from 1 July 2023 to 30 June 2026**

The ACAN Program equips a Participating Entity with the activities, services, resources and tools to prepare its annual Modern Slavery Statement, under the Act.

Through the ACAN Program Managers, CAS will continue to coordinate the delivery of the ACAN Program through the provision of:

- Subject-matter expertise for the development of the ACAN Program.
- Regular communications and administrative support to the Participating Entity.
- Engagement with the Commonwealth Government, other authorities and stakeholders.

“ACAN Program” refers to provision of services under the ACAN Program from the date of execution to the Participating Entity of the 2023-2026 ACAN Program Terms and Conditions below to 30 June 2026.

ACAN Program 2023-2026 Terms and Conditions

General

1. The 2023-2026 ACAN Program commences on the date of execution of these 2023-2026 ACAN Program Terms and Conditions until 30 June 2026.
2. Details of the 2023-2026 ACAN Program are set out in the 2023-2026 ACAN Program Scope of Work above.
3. In order to participate in the 2023-2026 ACAN Program, the Participating Entity must:
 - a. provide to CAS the 2023-2026 ACAN Program Terms and Conditions as completed and signed by the duly authorised representative of the Participating Entity;
 - b. pay the Participating Entity’s annual financial contribution towards the cost of the 2023-2026 ACAN Program (**Contribution**) excl GST by 31 July 2023, 31 July 2024 and 31 July 2025.
4. The Participating Entity must provide the details of its nominated Modern Slavery Liaison Officer (**MSLO**) as its duly authorised representative to participate in the 2023-2026 ACAN Program.
5. If for any reason the 2023-2026 ACAN Program cannot be commenced or is not capable of continuing as planned in any respect, CAS may cancel or amend the 2023-2026 ACAN Program. If CAS cancels the 2023-2026 ACAN Program, or any aspect of the 2023-2026 ACAN Program, the Participating Entity will receive a partial refund of its Contribution, less any cost already incurred under the 2023-2026 ACAN Program up to the date of cancellation.
6. The laws of New South Wales, Australia, govern these 2023-2026 ACAN Program Terms and Conditions.

Intellectual Property

7. CAS will provide an online portal (**Portal**) for use by each Participating Entity to access resources, tools, and training materials in the 2023-2026 ACAN Program. The Participating Entity acknowledges that all intellectual property rights in the Portal and the content within the Portal, are owned by CAS. To the extent that a Participating Entity has any intellectual property rights in the content within the Portal, the Participating Entity fully assigns those intellectual property rights to CAS.
8. CAS grants to the Participating Entity a royalty free (except for the Contribution), perpetual, irrevocable, non-exclusive non-assignable licence to use, reproduce, adapt and modify content posted on the Portal for purposes of that Participating Entity’s preparation of a Modern Slavery Statement and associated training and activities. The licence is valid for the period that the Participating Entity’s Contribution to the ACAN Program has been paid in full by the relevant deadline

Supplier risk management platform

9. CAS will provide each Participating Entity with a subscription to a supplier risk management platform (**Sedex**) to facilitate online management and information exchange (**Information Exchange**) between each Participating Entity and businesses that supply or trade with the Participating Entity. Examples of information exchanged on Sedex include supplier chain mapping, supplier risk assessments and analysis, and audit reports on supply chain performance. As CAS is the direct contracting party with Sedex and effectively responsible for Participating Entity’s use of Sedex, it is necessary to ‘back to back’ obligations with the Participating Entity. Against this background, each Participating Entity indemnifies CAS in respect of all liabilities, costs, expenses, fines, damages and costs (including but not limited to any direct, indirect or consequential losses, loss of profit, loss of

reputation and all interest, penalties and legal costs (calculated on a full indemnity basis) and all other reasonable professional costs and expenses) suffered or incurred by CAS arising out of or in connection with the Participating Entity's use of Sedex.

Confidentiality and privacy

- 10. CAS will keep confidential any confidential information provided to it by the Participating Entity under the 2023-2026 ACAN Program.
- 11. The Participating Entity will keep confidential any confidential information of CAS or of any other Participating Entity.
- 12. CAS collects information (including the MSLO's contact details (such as phone number, email address, position/title), and details of employee training for use in the LMS and for the purpose of the 2023-2026 ACAN Program. The personal information collected will be treated in accordance with CAS' Privacy Policy, a copy of which can be found at <https://www.sydneycatholic.org/terms-and-conditions/#privacy>

Annual cost per Participating Entity to join the 2023-2026 ACAN Program	
The Participating Entity will be issued an annual invoice on 1 July 2023, 2024 and 2025	
Under \$100 million	\$5,000
Between \$100 million and \$250 million annual consolidated revenue	\$12,500
Between \$250 million and \$500 million annual consolidated revenue	\$18,500
Between \$500 million and 1 billion annual consolidated revenue	\$28,500
Over \$1 billion annual consolidated revenue	\$48,000
Optional Additional Contribution <i>(Additional ACAN Social Audits and Participating Entity referral pathway development and capacity building. This option is provided at the specific request of some Catholic organisations) Based on annual consolidated revenue x 0.00011 capped at \$75k.</i>	

Please email a signed and completed copy of page 8 to: info@acan.org.au

<u>Details of Participating Entity:</u>	
Name of Participating Entity:	
ABN of Participating Entity:	
Insert amount to be invoiced:	
<u>Contact details of nominated MSLO</u>	
Name of MSLO:	
Position/Title:	
Email:	
Website:	
Work ph:	

Acceptance by duly authorised representative

I am the duly authorised representative of the Participating Entity named above and on behalf of the Participating Entity, accept the 2023-2026 ACAN Program Terms and Conditions.

Signature: _____

Name: _____

Position/title: _____

Date: _____