



Modern Slavery Statement

In compliance with the Modern Slavery Act
2018 (Cth) (Act)

January 1 2024 – December 31 2024

CATHOLIC SCHOOLS BROKEN BAY

Caroline Chisholm Centre Building 2, 423 Pennant Hills Road, Pennant Hills, NSW 2120
| PO Box 4509 Thornleigh NSW 2120 | csbb.catholic.edu.au |

Table of contents

Table of contents	1
1. Introduction	2
2. Reporting entity	3
3. Structure, operations and supply chain	3
4. Risks of modern slavery practices in operations and supply chains of the reporting entity and owned and/or controlled entities	8
5. Actions taken by the reporting entity and owned and controlled entities to assess and address risks, including due diligence and remediation processes	9
6. How the reporting entity assesses the effectiveness of these actions	17
7. Process of consultation with owned or controlled entities	18
8. Principal Governing Body endorsement	19
9. Principal Governing Body Signatures	20

1. Introduction

Catholic Schools Broken Bay (CSBB) is committed to doing everything in its control to contribute to the eradication of modern slavery in Australia and globally. In doing this, CSBB is committed to acting with integrity, honesty, transparency and fairness.

Modern slavery describes situations where victims are exploited and their freedom undermined, by the use of coercion, threats or deception. Practices that constitute modern slavery include:

- Slavery;
- Servitude;
- Forced labour;
- Debt bondage;
- Forced marriage;
- Deceptive recruiting for labour or services;
- Human trafficking; and
- Child labour.

In 2015, Pope Francis referred to slavery as “an open wound on contemporary society”. Pope Francis pledged to work with other global religious leaders to empower their communities to stand against modern slavery in all its forms. Australia pledged to eradicate modern slavery and human trafficking by 2030 by adopting the Pope Francis inspired *UN Sustainable Development Goal (SDG) 8.7*.

As a system of Catholic schools immersed in the Gospel of Jesus, CSBB is committed to the values of compassion, tolerance, forgiveness and reconciliation. CSBB opposes modern slavery in all its forms and recognises the importance of protecting the human rights of all people in its communities and those that may be impacted by its activities.

CSBB acknowledges its role and responsibility in safeguarding the human rights of all people through ethical business practices and that it must do its part to prevent, identify and report unacceptable labour practices in its supply chains as they are identified.

Continued consideration of CSBB’s procurement practices and its supply chains will see CSBB implement even stronger processes and practices thereby endeavoring to mitigate risk that business practices and supply chains do not contribute to modern slavery.

This statement addresses the modern slavery reporting criteria in accordance with the Modern Slavery Act 2018 (Cth) ('Act') for the financial year 1 January 2024 to 31 December 2024.

2. Reporting entity

The reporting entity submitting this statement at the time of submission is Catholic Schools Broken Bay Limited as Trustee for the Catholic Schools Broken Bay Trust (ABN: 82 991 936 092), with the incorporation of CSBB on 1 January 2025.

During the period to which the statement relates, the reporting entity was Catholic Schools Broken Bay (ABN: 19 542 675 092) ('CSBB').

The registered office for the reporting entity is Caroline Chisholm Centre, Building 2, 423 Pennant Hills Rd, Pennant Hills NSW.

3. Structure, operations and supply chain

Structure

The reporting entity has 45 schools and a central office within its system:

School	Location
Catholic Schools Broken Bay (Central office)	Pennant Hills
Corpus Christi Catholic Primary School	St Ives
Eileen O'Connor Catholic School	(various)
Holy Cross Catholic Primary School	Kincumber
Holy Family Catholic Primary School	Lindfield
Mackillop Catholic College	Warnervale
Maria Regina Catholic Primary School	Avalon
Mater Maria Catholic College	Warriewood
Mercy Catholic College	Chatswood
Our Lady Help of Christians Catholic Primary School	Epping
Our Lady of Dolours Catholic Primary School	Chatswood
Our Lady of Good Counsel Catholic Primary School	Forestville
Our Lady of Perpetual Succour Catholic Primary School	West Pymble
Our Lady of the Rosary Catholic Primary School	The Entrance

Our Lady of the Rosary Catholic Primary School	Waitara
Our Lady of the Rosary Catholic Primary School	Wyoming
Our Lady Star of the Sea Catholic Primary School	Terrigal
Prouille Catholic Primary School	Wahroonga
Sacred Heart Catholic Primary School	Pymble
Sacred Heart Catholic Primary School	Mona Vale
St Agatha's Catholic Primary School	Pennant Hills
St Bernard's Catholic Primary School	Berowra
St Brendan's Catholic Primary School	Lake Munmorah
St Brigid's Catholic College	Lake Munmorah
St Cecilia's Catholic Primary School	Balgowlah
St Cecilia's Catholic Primary School	Wyong
St Gerard's Catholic Primary School	Carlingford
St John Fisher Catholic Primary School	Tumbi Umbi
St John the Baptist Catholic Primary School	Freshwater
St John the Baptist Catholic Primary School	Woy Woy
St John's Catholic Primary School	Narraweena
St Joseph's Catholic College	East Gosford
St Joseph's Catholic Primary School	Narrabeen
St Kevin's Catholic Primary School	Dee Why
St Kieran's Catholic Primary School	Manly Vale
St Leo's Catholic College	Wahroonga
St Martin's Catholic Primary School	Davidson
St Mary's Catholic Primary School	Manly
St Mary's Catholic Primary School	Toukley
St Patrick's Catholic Primary School	Asquith
St Patrick's Catholic Primary School	East Gosford
St Paul's Catholic College	Manly
St Peter's Catholic College	Tuggerah
St Philip Neri Catholic Primary School	Northbridge
St Rose Catholic Primary School	Collaroy Plateau
St Thomas' Catholic Primary School	Willoughby

Operations

CSBB is a not-for-profit system of schools that delivers Catholic education to approximately 18,000 enrolled students and employs approximately 3,000 staff.

CSBB has 37 primary schools, 7 high schools, and 1 K-12 school over 45 locations across 3 geographical areas: Sydney North Shore, Sydney Northern Beaches and NSW Central Coast with CSBB headquarters in Pennant Hills, Sydney, Australia.

CSBB in the 2024 year had an aggregate turnover of \$359m. The two main sources of income which fund CSBB's operations are government grants and school fees.

Over the 5 years from 2020 to 2025 CSBB has undertaken a 'Towards 2025' organisational transformation led by the Director of Schools, which introduced a workstream approach for the delivery of school system support services, consisting of:

1. Student Achievement;
2. Evangelisation and Catechesis;
3. Capability and Enablement;
4. Governance, Legal and Risk;
5. Digital Enablement;
6. Facilities and Procurement; and
7. Financial Viability.

Supply chain

CSBB enters into contracts, for both goods and services, with:

- Construction companies to carry out capital works at schools;
- Facilities management companies to provide services such as on-site security services and facility repairs and maintenance;
- Commercial entities to provide goods and services such as stationery and school marketing materials, food ordering platforms or canteen services, school uniforms, and overseas excursions for pilgrimages and immersion programs for both students and staff;
- Education services companies to provide curriculum subscriptions and products and learning aids;
- Information Technology companies to provide audio-visual equipment or classroom learning related technologies;
- Communication service providers to provide landline, mobile and internet solutions, website design and hosting, and IT infrastructure, devices, applications and software, as well as network management services.

These goods and services may relate directly to the provision of education (e.g., stationery and teaching products) or indirectly support the provision of education (e.g. roof repair services engaged at a school site).

In the 2024 year, CSBB engaged with 2,097 suppliers.

CSBB's 2024 spend and suppliers by CSBB category are set out in Figures 1 and 2 below.

Figure 1: Spend per category – 2024 spend

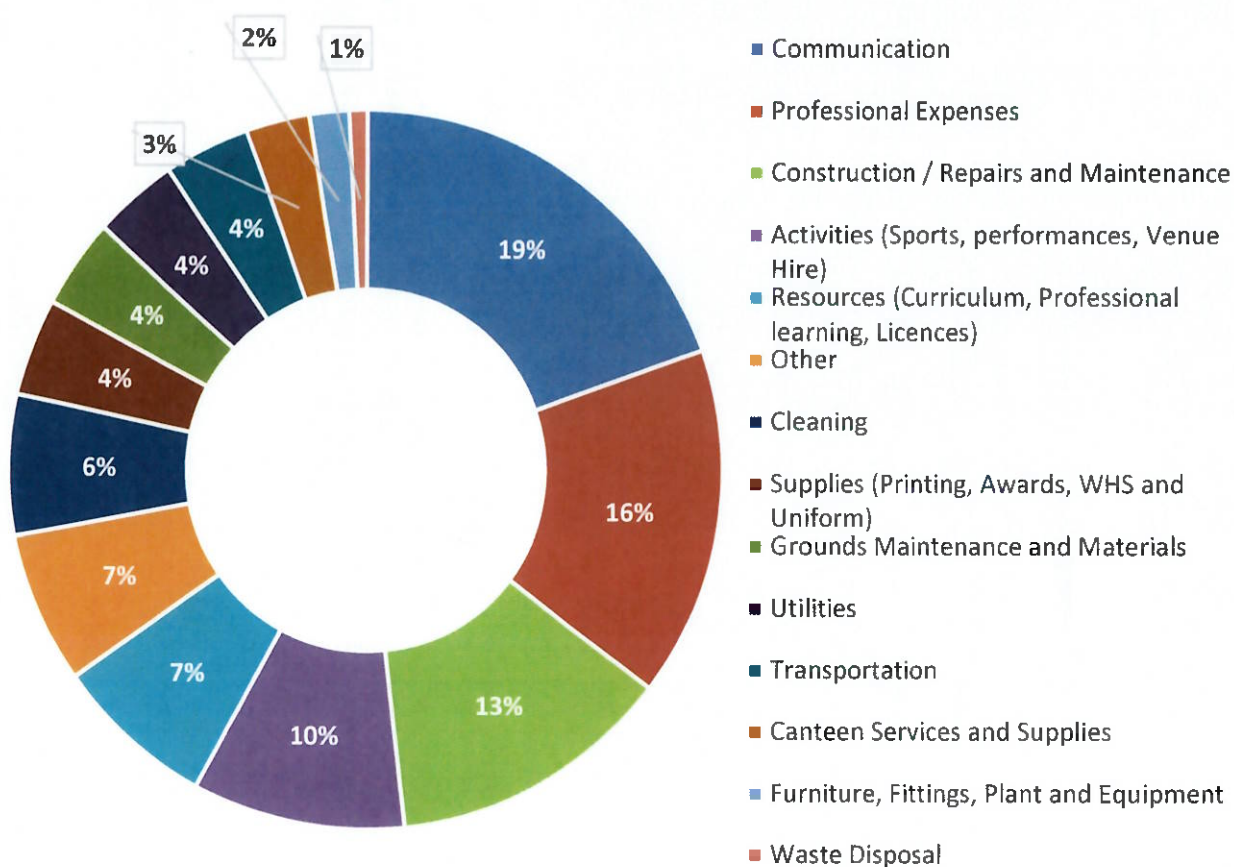
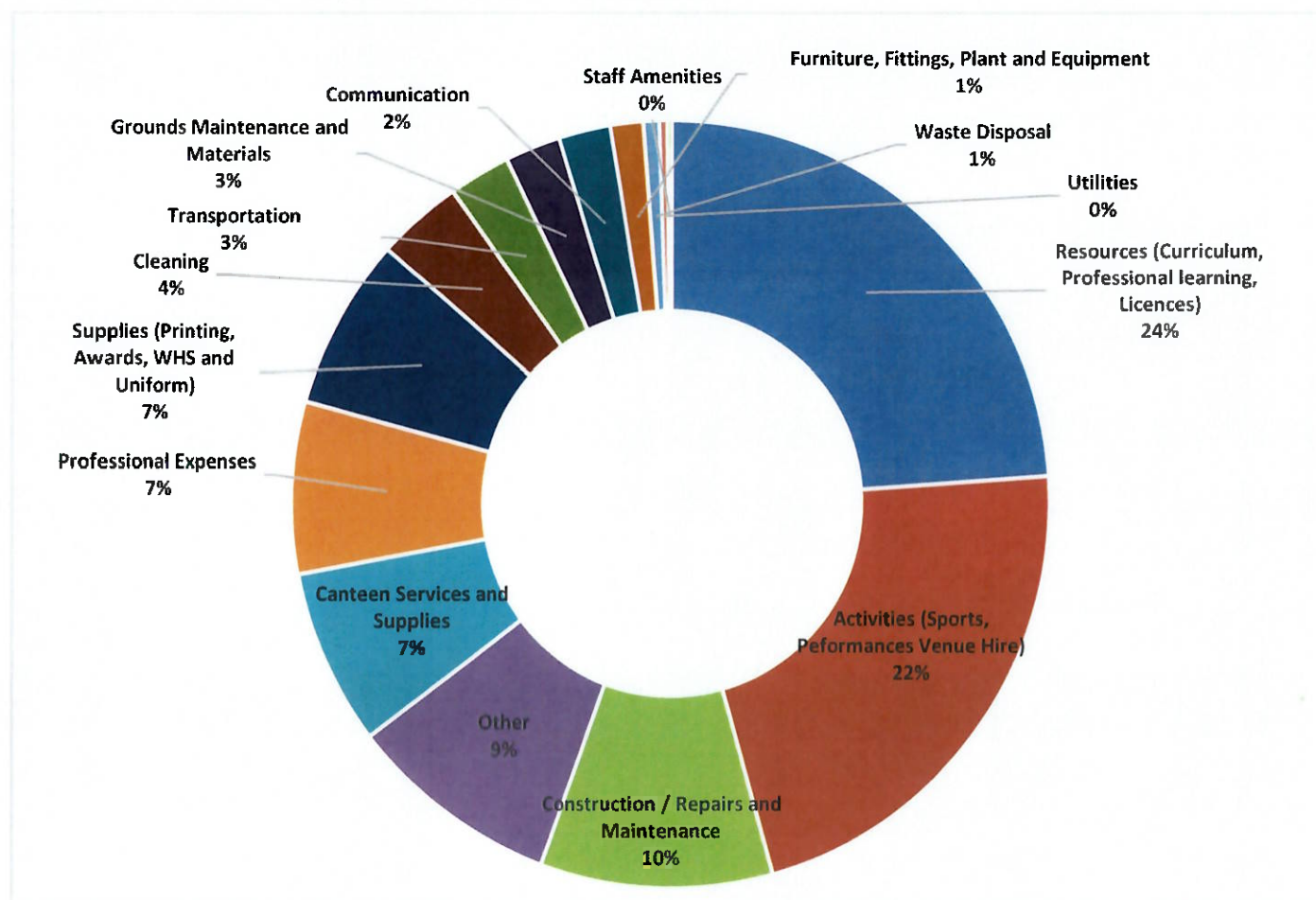


Figure 2: Number of suppliers by category – 2024 spend



CSBB engages a labour force of teaching and support staff (both employed and contracted) with a small number of services in schools provided by overseas nuns under a stipend (and not an employment) arrangement.

While the suppliers engaged by CSBB are predominantly Australian owned, some are internationally owned, and it is acknowledged some will have their own international suppliers (i.e. 'indirect suppliers' to CSBB).

As part of this Modern Slavery Statement, CSBB reports on its actions to assess and address modern slavery risks associated with its operations, including its Procurement Framework, and outlines how it assesses and addresses modern slavery risks in its supply chains.

A Procurement Reference Group, comprising CSBB School Principals, key staff and representatives from some of the CSBB support services workstreams, developed the **CSBB Procurement Framework**, has presence on relevant tender evaluation panels and

is involved in decision making that effects CSBB's approach to modern slavery.

The CSBB Procurement Framework identifies responsible business conduct in procurement and purchasing and is supported by policies and processes that ensure due diligence. CSBB decision making is delegated to the Responsible Persons through the CSBB Financial Delegations Policy who are aware of and acknowledge CSBB's commitment to the abolition of human slavery.

4. Risks of modern slavery practices in operations and supply chains of the reporting entity and owned and/or controlled entities

CSBB has assessed the risks of modern slavery practices in its reporting entity and schools by segmenting the following risks:

1. Risks that CSBB may cause modern slavery practices - a risk that CSBB operations may directly result in modern slavery practices

CSBB considers risks in this area to comprise those directly related to its employment practices.

CSBB employs 2,937 employees.

All CSBB full or part time employees are employed by the reporting entity with temporary contracted employees being employed by both the reporting entity and schools.

2. Risks that CSBB may contribute to modern slavery practices - risk that CSBB's operations and/or actions in its supply chains may contribute to modern slavery, including acts of omissions that may facilitate or incentivise modern slavery

Areas where risks of this nature have been identified include:

- Construction projects with demanding timelines that may result in contractors undertaking work practices that are out of CSBB's control;
- Technology services contracted that involve overseas workers;
- Goods produced overseas; and
- Key risk areas identified through 'risk segmentation analysis' in respect of CSBB's supplier base (this is explored further below).

3. Risks that CSBB may be directly linked to modern slavery practices - through the activities of another entity it has a business relationship with.

This risk is broad in scope and sits across all supplier categories. It focuses on entities CSBB has a contract with, has an ongoing relationship with, and/or a large spend with.

CSBB's initial assessment of the risk of modern slavery in its supply chains was undertaken with *SD Strategies* in 2019 and the results assisted with the identification of key areas of focus.

The areas measured by the "Bridge the Gap" risk assessment included management systems, risk management, human resources and recruitment, customers and stakeholders and procurement and supply chain. The outcome presented a starting point for further risk review that identified where modern slavery and the intersecting risks to the rights of humans can be found in CSBB's supply chains.

A follow up risk assessment has been undertaken, including a risk segmentation analysis for CSBB's supply chains and supplier base. The results of this analysis are set out in Section 5 below.

5. Actions taken by the reporting entity and owned and controlled entities to assess and address risks, including due diligence and remediation processes

CSBB takes actions in its employment practices to avoid the risk of modern slavery practices. CSBB also requires suppliers and contractors to take reasonable steps to avoid practices that could contribute to the risk of modern slavery in their supply chains.

Actions taken include:

1. Risks that CSBB may cause or contribute to modern slavery practices - Risk that CSBB operations may directly result in modern slavery practices

Identify and assess: CSBB has assessed the risk of modern slavery in its operations to be very low due to CSBB's robust employment practices which serve to safeguard employees which in turn, safeguard against modern slavery.

CSBB has key measures in place as follows:

- CSBB verifies identification documents prior to hiring to maintain compliance with legal standards.
- CSBB determines wages based on job skills and experience, aligning with legally recognised collective bargaining agreements (CBA).
- CSBB has established a monitoring system to ensure adherence to a 38-hour workweek.

- CSBB prioritises the health and safety of workers by implementing appropriate safeguards.

Integrate findings and track performance: CSBB has in place systems, policies and procedures to safeguard its employees and their rights. CSBB regulates working conditions and employment in line with the Fair Work Act 2009 and its negotiated enterprise agreements. All of CSBB's employees are located within Australia, and CSBB has a strong employment and onboarding process, where employees are respected and remunerated commensurate with the minimum award rate if they are not covered by a contract.

Communicate: CSBB is committed to promoting justice and fairness in relationships and service and to promoting proper working conditions characterised as just and fair. CSBB is committed to continually revising its Modern Slavery Statement as new risks and trends emerge.

2. Risks that CSBB may contribute to modern slavery practices - Risk that CSBB's operations and/or actions in its supply chains may contribute to modern slavery, including acts or omissions that may facilitate or incentivise modern slavery

Identify and assess: In all construction projects, CSBB ensures that a full and detailed construction program is put together by construction and repairs and maintenance suppliers. These programs are subject to thorough due diligence using **Subject Matter Experts (SMEs)** to ensure the assumptions embedded in the program do not indicate unreasonable or undeliverable timeframes for tasks in accordance with standard industry practices. Equally, a thorough due diligence exercise in relation to quoted costs is used to uncover labour rates that indicate workers may be paid rates which are below industry standard which may in turn indicate that slavery is embedded within supply chains.

CSBB has formalised arrangements with some CSBB 'Pre-Qualified Suppliers' where rate cards are agreed, subject to due diligence periodically and refreshed if necessary. All subsequent quotes from these suppliers are checked back to these pre-agreed rate cards.

In the case of technology produced overseas, CSBB adopts its vendor due diligence, tender due diligence and contracting measures (see sub-section 3 below) to identify, assess and manage risk associated with its vendors in this space. If a risk is identified, CSBB will not enter into business relationships with a vendor who appears to carry a high risk of modern slavery.

Integrate findings and track performance: SMEs are engaged across multiple capital works and repairs and maintenance projects to ensure relevant benchmarks for

timeframes and costs and a database of these benchmarks is maintained.

Communicate: CSBB is committed to continually communicating with its suppliers through supplier relationship management, seeking responses to risk-related questions through vendor and tender due diligence (see sub-section 3 below), and revising its Modern Slavery Statement as new risks and or trends emerge.

3. *Risks that CSBB may be directly linked to modern slavery practices - Risk that CSBB operations may be connected to modern slavery through the activities of another entity it has a business relationship with*

Identify and assess: CSBB has taken the following steps to assess its supply chain risk:

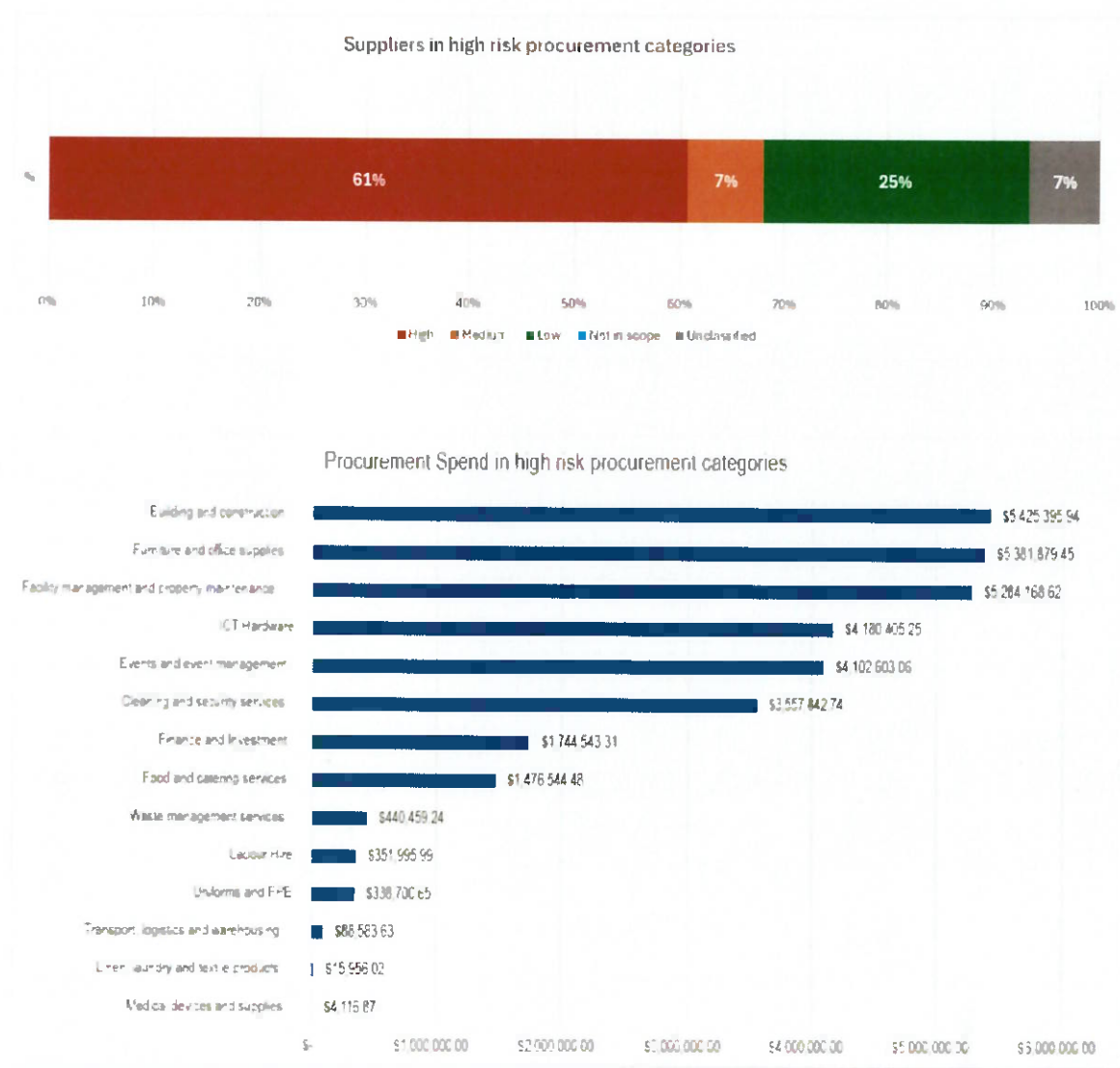
Supplier base and management

- 1 Quantify spend: for the 2024 year, the total spend with suppliers was approximately \$56 million.
- 2 The total spend and number of suppliers by supplier category has been categorised by CSBB. This analysis is set out graphically in Section 3 and highlights some weighting in **spend** towards communication (19%), professional expenses (16%) and construction and repairs and maintenance (13%). Total number of **suppliers** for 2024 spend show weighting towards curriculum and learning resources (24%), sports, performances and venue hire (22%) and construction and repairs and maintenance (10%).

Risk segmentation analysis for CSBB's supplier base

CSBB has engaged with the Australian Catholic Anti-Slavery Network (ACAN) to provide additional data that highlights the modern slavery category risk segmentation of CSBB's 2024 supplier base. The ACAN Category Risk Taxonomy has been assigned to individual suppliers.

It has been identified that 57% of CSBB's 2024 spend was with suppliers in categories labelled as having a high risk of modern slavery by ACAN, and 61% of CSBB's suppliers were in categories labelled as having a high risk of modern slavery by ACAN.



One of the offerings of ACAN to CSBB is the use of the SEDEX platform to engage with CSBB's suppliers. Based on ACAN's initial assessment of CSBB's 2024 supplier base:

- **366 SEDEX supplier surveys** have been completed, with **238** of them being completed by suppliers in ACAN categories labelled as having a high risk of modern slavery.
- **47 of CSBB's 2024 suppliers** are registered on **SEDEX**, including **38** suppliers in ACAN categories labelled as having a high risk of modern slavery.

Supplier category risk management

- 1 **Understand the risk:** risk analysis to identify the level of risk of each product or service in CSBB's supply chains has been completed. This process is to be undertaken for all suppliers at intervals throughout the contract lifecycle. A risk

and value matrix on which CSBB spend categories was plotted and has been developed for the purpose of a refreshed assessment of primary sourcing strategy by spend category.

Arrangements have been formalised with a panel of CSBB 'Pre-Qualified Suppliers' including suppliers in high risk categories such as uniform providers, canteen providers, cleaners, grounds and gardens maintenance and head contractors used for construction and repairs and maintenance projects, that incorporates appropriate tender due diligence. This creates a level of influence over the behaviours of these suppliers through agreed rate cards, and ensuring compliance with trade licences and insurances.

- 2 Additional actions and monitoring have been undertaken in key areas considered to carry relatively higher levels of potential modern slavery risk (in addition to actions previously mentioned for facilities and technology suppliers):
 - In the case of communications and learning resources, CSBB will adopt its vendor due diligence, tender due diligence and contracting measures (see the remainder of sub-section 3 below) in identifying, assessing and managing risk associated with its vendors, and deemed appropriate on risk assessed, will not enter into business relationships with vendors perceived to carry a high risk of modern slavery;
 - In the area of food and catering services, CSBB monitors the provision of services on site. As part of tender processes, CSBB will refresh supplier panel members and request financial information to provide comfort that appropriate payments are made to employed and subcontracted staff;
 - In the area of uniforms, CSBB will ensure that its Pre-Qualified uniform suppliers either have their own Modern Slavery policy, or have the ability to provide appropriate evidence of their risk management, which may include them being a member of the SEDEX platform and/or relevant unions with appropriate employee reporting requirements. CSBB will require that if these suppliers have overseas facilities, they are subject to appropriate audits or business licensing and will provide the report to CSBB upon request;
 - In the area of cleaning services and grounds and garden services, hourly rates offered by providers in their CSBB Pre-Qualified Supplier rate cards have been reconciled with hourly rates embedded in the relevant industry award. Suppliers will be questioned by CSBB if it appears there is insufficient room in the quoted hourly rate to cover

labour costs, plus overheads.

Supplier diligence and agreements

In 2024 CSBB continued to undertake a process of rationalising its supplier base to a lower the total number of suppliers, to bring about:

- streamlining to create efficiencies in the end to end 'procure to pay' process, in parallel with the rollout of CSBB's **Enterprise Management System (EMS)**;
- further enhance value for money through CSBB system wide exclusive 'Preferred Supplier' and 'Pre-Qualified Supplier' supplier panel arrangements; and
- further enhance risk management around supplier compliance, performance and areas including modern slavery.

As part of this supplier rationalisation process, CSBB's **vendor due diligence** has been embedded in the EMS and has had the modern slavery component of it split out and treated through CSBB's engagement with ACAN and its platforms (refer to the remainder of this Section 3 for further detail).

If a modern slavery risk is identified, actions will be taken including ending the relationship with the supplier if the identified issue cannot be rectified.

In addition to CSBB's vendor due diligence, CSBB's **Market Testing Requirements** ensure that all new purchases and agreements are appropriately market tested in correlation with the size and inherent risk of the purchase or agreement. The purchaser is required to provide proper justification for a chosen provider, including consideration of non-price factors such as quality, risk and alignment with CSBB values. This process highlights any vendors who are pricing significantly below the market which in turn, may indicate modern slavery risks.

CSBB have a criteria in key **tender due diligence** material (tender documentation) that seeks the extent of the tenderer's knowledge of the Modern Slavery Act 2018 and the way they are managing modern slavery risks in their supply chains. This in turn shows a company's willingness to work with CSBB to address any modern slavery risks in its supply chains.

All relevant CSBB **legal agreement** precedents will incorporate a Modern Slavery Act clause. Furthermore, should CSBB enter into a supplier or contractor's precedent agreement for a contract of material value, CSBB will, if necessary, ask that the following clauses be inserted:

[Clause X] Anti-Slavery

(a) In this clause [X]:

- (i) *Modern Slavery has the same meaning as in the Modern Slavery Act 2018 (Cth); and*
 - (ii) *Modern Slavery Laws means the Modern Slavery Act 2018 (Cth), the Modern Slavery Act 2018 (NSW), any other applicable legislation and regulations relating to Modern Slavery, and any code of practice or compliance code relating to Modern Slavery applicable to this Agreement.*
- (b) *The Supplier must take all reasonable steps to ensure there is no Modern Slavery in its operations and supply chain, or that of its subcontractors and suppliers, including:*
- (i) *establishing and implementing appropriate systems and processes (including relevant employee training systems and supply chain due diligence procedures) to ensure any risks or occurrences of Modern Slavery in its supply chains or any part of its business are identified, assessed and addressed;*
 - (ii) *notifying Catholic Schools Broken Bay as soon as reasonably practicable after it becomes aware of, or has a reasonable basis for suspecting, instances of Modern Slavery in its supply chains or any part of its business; and*
 - (iii) *taking all reasonable steps to ensure that any instances of Modern Slavery in its supply chains or any part of its business cease and victim remediation occurs to the reasonable satisfaction of Catholic Schools Broken Bay.*
- (c) *The supplier must provide all reasonable assistance (including the provision of information and access to document) that Catholic Schools Broken Bay reasonably requires to ensure supplier's compliance with clause [X] and to enable the Catholic Schools Broken Bay to comply with its obligations under Modern Slavery Laws.*

Internal safeguards and controls

In late 2024 CSBB engaged with ACAN to support CSBB in continuously improving its practices in the area of modern slavery and provide additional data analysis to identify areas of high risk.

The additional data analysis (risk segmentation analysis) for CSBB's supplier base is laid

out above.

CSBB looks to undertake the following steps in respect of modern slavery practices (including in respect of its suppliers in categories labelled as having a high risk of modern slavery by ACAN):

- documenting and executing upon a process to communicate expectations to suppliers in relation to modern slavery (prioritising those who have been deemed to be in modern slavery high risk categories by ACAN);
- further analysis of SEDEX data and encouraging CSBB's suppliers to engage with the SEDEX platform;
- internal training on ACAN modern slavery e-learning modules for key Governance, Legal and Risk, Facilities and Procurement and leadership staff;
- modern slavery workshops and meetings; and
- the further use of ACAN data to measure effectiveness of modern slavery risk management.

Integrate findings and track performance: CSBB have implemented a process to regularly monitor a number of high-risk supplier categories, through:

- 1 **Public information monitoring** – monitoring information publicly available which refers to modern slavery practices;
- 2 **Panel ('Pre-Qualified') providers** – ongoing checking of pricing rate cards offered to CSBB by CSBB's Pre-Qualified Suppliers;
- 3 **Registration of onsite contractors and providers** – any contractor or provider that is required to enter a CSBB school site is required to have proper insurances and Child Protection registrations. By undertaking these checks and monitoring, CSBB is reinforcing use of reputable and registered suppliers and contractors;
- 4 **Market testing** – by undertaking an assessment of reasonable market value in alignment with CSBB's Market Testing Requirements, CSBB seeks to ensure all purchases and contracts correlate with the commercially accepted price of the goods or services to ensure a reduced modern slavery risk.

CSBB intends to engage further with the SEDEX platform to track the risk profile and performance of its key suppliers.

Communicate: CSBB is committed to continually communicating with its suppliers through appropriate supplier relationship management, seeking responses to risk-related questions through tender due diligence, and revising its Modern Slavery Statement as new risks and trends emerge.

CSBB expects to have a greater number of internal conversations, workshops, training sessions (ACAN modules) around modern slavery, and communicate with suppliers around CSBB expectations in relation to modern slavery.

Summary

CSBB has policies, procedures and guidance in place to ensure that CSBB operates to a certain standard. These policies guide the responsible stewardship of resources, and ensure agreements are ethical, efficient, effective, and bring value for money.

The aim of CSBB's centralised position to modern slavery is to mitigate the risk of slavery in its supply chains. By embedding modern slavery due diligence into CSBB's tender and vendor due diligence processes and legal agreements, CSBB aims to address human rights issues by working with suppliers to combat modern slavery. CSBB believes that suppliers that have the security of a contract in place are less likely to employ illegal slavery practices.

Between 2020 and 2024 CSBB has:

1. Completed a high-level assessment of its operational supply chain risk;
2. Created a process for vendor and tender due diligence;
3. Embedded modern slavery measures into its supplier contracting pro-formas;
4. Assessed categorised spend to identify key risk areas;
5. Commenced the process of creating awareness both in and outside the organisation;
6. Implemented technologies to assist with procurement processes;
7. Identified key risk areas/gaps in purchasing for its school system;
8. Finalised a rolling list of compliant suppliers;
9. Engaged with an external consultant to review supplier categorisation, sourcing strategy by category, compliance requirements by category and the supplier on-boarding process;
10. Engaged with ACAN to run a standard assessment methodology around risk assessment across CSBB's supplier base categories; and
11. Engaged with ACAN to identify potential areas for improvement to mitigate modern slavery risks.

6. How the reporting entity assesses the effectiveness of these actions

Process to regularly review

The elements of vendor due diligence and tender due diligence, and the embedding of modern slavery into supplier contracting pro-formas will be continually reviewed, refined and improved, as will CSBB's supplier base, and the migration of supplier and contract information into the EMS will make this review process more effective and efficient.

Continued engagement with ACAN and the SEDEX platform will ensure further improvement in how CSBB analyses risk in its supply chain, and the controls and other measures it puts in place internally to manage these risks.

Regularly checking risk management process

Within CSBB, workstream collaboration occurs to determine issues relating to procurement including:

- continual refinement of the information requested as part of vendor due diligence and tender due diligence;
- continual refinement of the CSBB Procurement Framework and its related policies and procedures; and
- the management of suppliers and contracts in the EMS.

Regular engagement and feedback

The CSBB Procurement function aims to engage with internal stakeholders, including school-based staff in respect of modern slavery, with education programs and materials provided when necessary.

The CSBB Procurement function also aims to seek feedback from schools on how suppliers are managed which will give insight on compliance and modern slavery.

Key Performance Indicators (KPIs)

CSBB's primary KPI in the area of modern slavery is to only engage with those suppliers which have met the requirements of CSBB's vendor and/or tender due diligence.

7. Process of consultation with owned or controlled entities

The CSBB Procurement Framework was drafted in 2020 and finalised in 2021. It refers to the need for CSBB to operate in accordance with the Modern Slavery Act 2018.

This Procurement Framework was developed through consultation with other Catholic Schools Offices and internal stakeholders including the Procurement Reference Group.

The status of procurement in CSBB was assessed and was aligned with CSBB's values and policies.

As the CSBB Procurement function continues to mature, it will continue to develop programs in line with modern slavery legislation to monitor, analyse and manage modern slavery risks into the future.

8. Principal Governing Body Endorsement

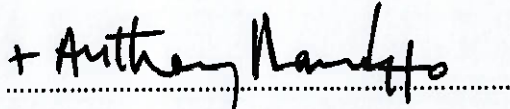
This Statement describes the actions of Catholic Schools Broken Bay in response to the Modern Slavery (Cth) Act 2018.

This statement highlights the steps Catholic Schools Broken Bay have taken to date and the work we are completing to eradicate modern slavery from our supply chains. This statement covers the financial year 1 January 2024 to 31 December 2024.

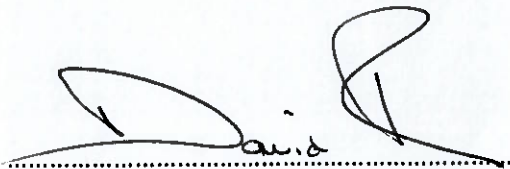
This statement has been approved by the Trustees of the Roman Catholic Church for the Diocese of Broken Bay (the principal governing body for the reporting entity).

This statement is approved and endorsed by the Responsible Persons of Catholic Schools Broken Bay (CSBB) for 1 January 2024 to 31 December 2024:

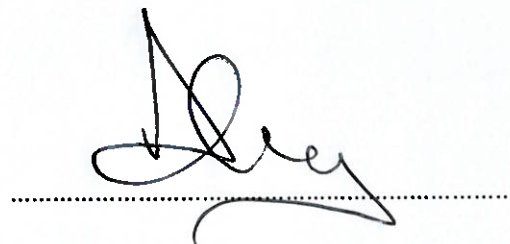
Signed at Pennant Hills on this 24/9/25 day of September



Most Rev Anthony Randazzo DD JCL
Bishop of Broken Bay
Responsible Person – CSBB (1 January 2024 to 31 December 2024)
Trustee of the Roman Catholic Church for the Diocese of Broken Bay



Very Rev Dr David Ranson
Vicar General
Responsible Person – CSBB (1 January 2024 to 31 December 2024)
Trustee of the Roman Catholic Church for the Diocese of Broken Bay



Mr Danny Casey
Director of Schools – Diocese of Broken Bay
Responsible Person – CSBB (1 January 2024 to 31 December 2024)