



# MODERN SLAVERY STATEMENT

In compliance with the Modern Slavery Act 2018 (Cth)

1 January 2025 – 31 December 2025

**CATHOLIC SCHOOLS BROKEN BAY**

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## Foreword, Approval and Signature

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Catholic Schools Broken Bay Limited as Trustee for the Catholic Schools Broken Bay Trust (**CSBB**) is committed to the eradication of modern slavery in Australia and globally. This statement addresses mandatory reporting criteria in accordance with the Modern Slavery Act 2018 (Cth) (**'Act'**) for the 1 January - 31 December 2025 reporting period.

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
- Child labour.

In 2015, Pope Francis referred to slavery as “an open wound on contemporary society”. Pope Francis pledged for the Catholic Church 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 *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. CSBB through its procurement practices and its supply chains has implemented strong processes and practices to mitigate the risk associated with contributing to modern slavery.

This Modern Slavery Statement was approved by the principal governing body of CSBB as defined by the Modern Slavery Act 2018 (Cth) (**'Act'**) on 22 June 2026. This modern slavery statement is signed by a responsible member of CSBB as defined by the Act.



**Very Rev Fr David Ranson**, Vicar General  
Chair of the Catholic Schools Broken Bay Limited Board

## Criteria 1 - Reporting entity

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Following the establishment of a body corporate for the operation of system schools in the Diocese of Broken Bay, Catholic Schools Broken Bay transferred its operations on 1 January 2025 to **Catholic Schools Broken Bay Limited as Trustee for the Catholic Schools Broken Bay Trust (ABN 82 991 936 092) (CSBB)**. This was the reporting entity during the period to which this statement relates.

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

CSBB has a **purpose** of *Inspiring hearts and minds to know Christ, to love learning, to use their talents to be the very best they can be*. CSBB pursues a **vision** of *Authentic, professional Catholic education, delivered with care and compassion*, and **values** of *Faith, Joy, Witness, Compassion and Courage*.

## Criteria 2 - Structure, operations and supply chain

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### Structure

As at 31 December 2025, CSBB had 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	Davidson
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 students and employs approximately 2,800 staff.

As at 31 December 2025, CSBB had 37 primary schools, 7 high schools, and 1 K-12 school over 47 locations across 3 geographical areas: Sydney North Shore, Sydney Northern Beaches and NSW Central Coast with headquarters in Pennant Hills, Sydney, Australia.

CSBB in the 2025 year had an aggregate turnover of \$378.2m. The two main sources of income which fund CSBB's operations are government grants and school fees.

In July 2025, CSBB commenced the five year *Shaping Tomorrow Together in Faith* strategy, led by Archbishop Anthony Randazzo. This strategy reinforces CSBB's commitment to collaboration as a system of schools and maintains the following workstreams within its structure:

1. Office of the Director (including Governance and Legal)
2. Evangelisation and Catechesis
3. Student Achievement
4. Capability and Enablement of Our People
5. Financial Management (including CSBB's Procurement team)
6. Infrastructure.

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

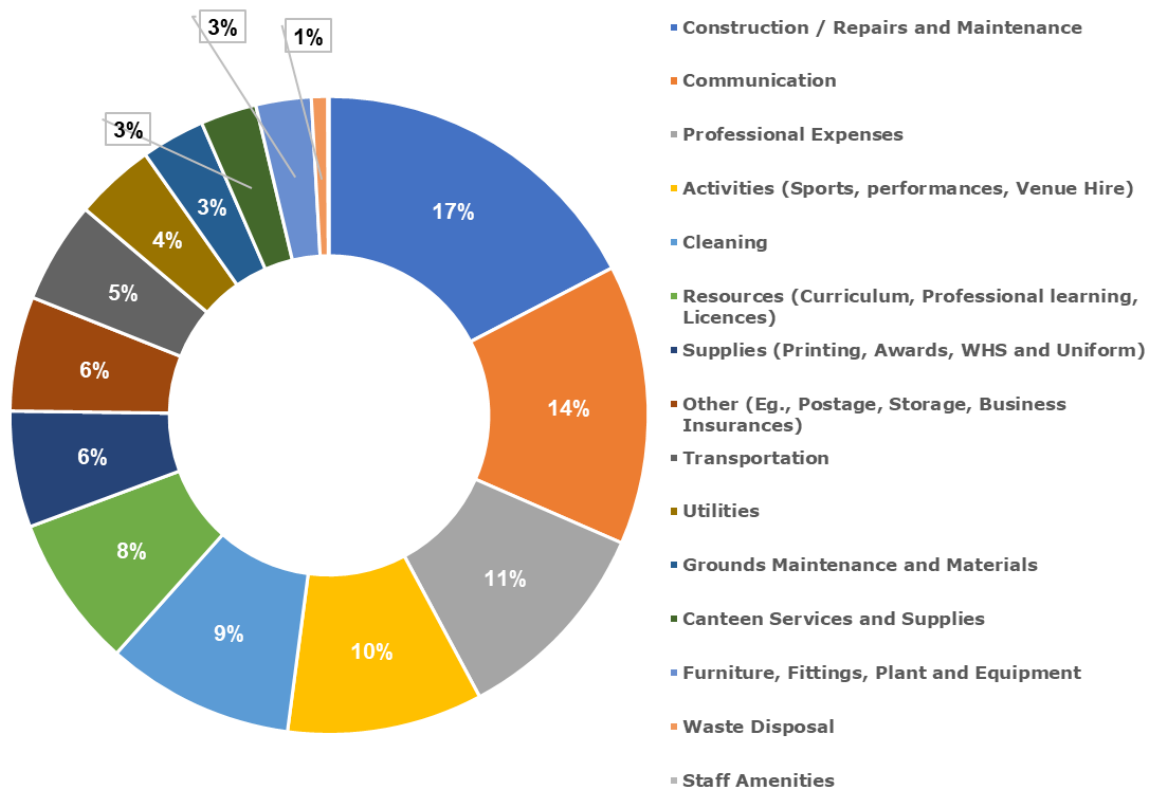
- construction companies to carry out capital works at schools
- facilities management companies to provide services such as on-site security services and facility repairs and maintenance
- commercial entities to provide goods and services such as stationery and school marketing materials, food ordering 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 can relate to the provision of education (e.g. stationery and teaching products) or support the provision of education (e.g. roof repair services engaged at a school site).

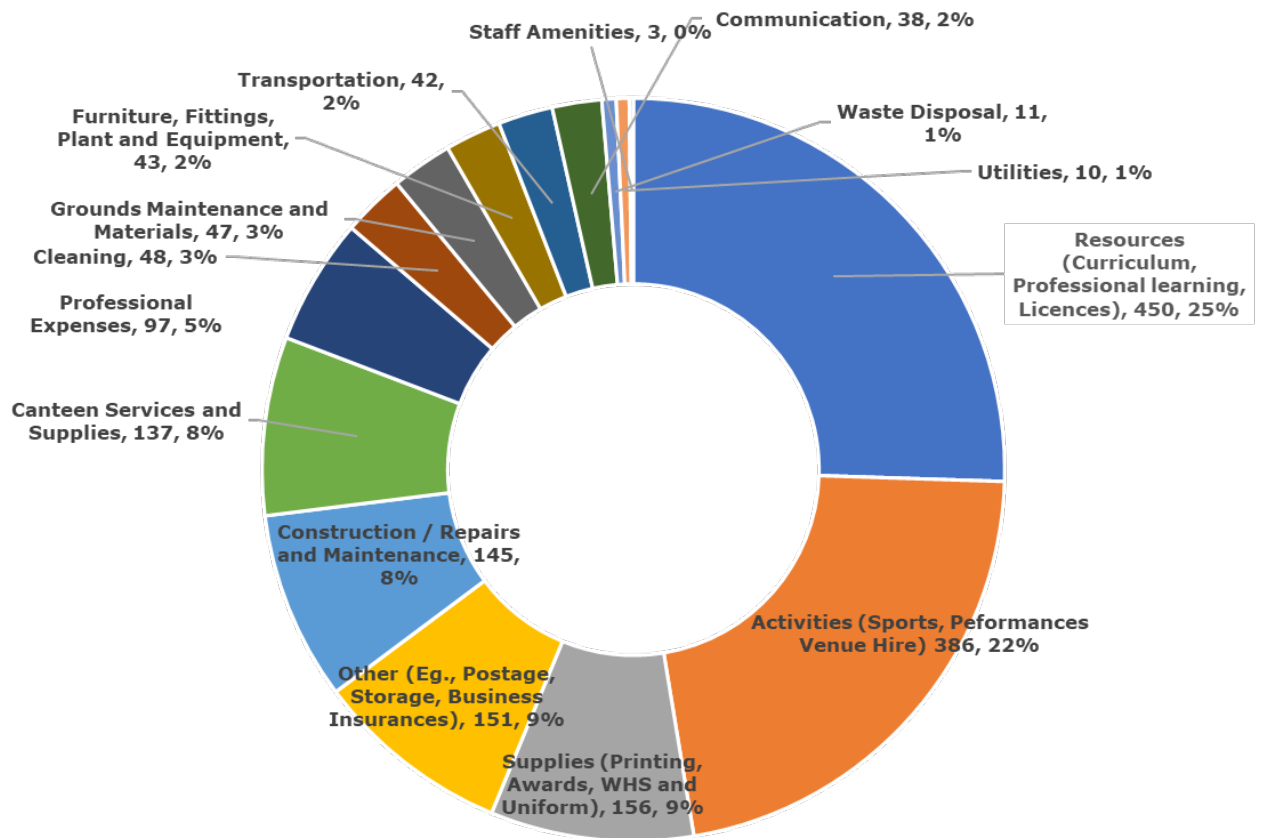
In the 2025 year, CSBB engaged with 1,771 suppliers.

CSBB's 2025 spend per category and number of suppliers by category are set out in Figures 1 and 2 below.

**Figure 1: Spend per category – 2025 spend**



**Figure 2: Number of suppliers by category – 2025 spend**



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

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. A Procurement Reference Group, comprising of CSBB School Principals, key staff and representatives from some of the CSBB support services workstreams, developed the **CSBB Procurement Framework**. Procurement work together with School Principals and key staff to improve CSBB's consideration of modern slavery risks when engaging with suppliers.

CSBB decision making is delegated through CSBB Financial Delegations Policy and all delegates are aware of and acknowledge CSBB's commitment to the abolition of modern slavery.

### **Criteria 3 - Risks of modern slavery practices in operations and supply chains of CSBB and owned and/or controlled entities**

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CSBB has identified two areas where modern slavery risks may result, or be linked to its operations: employment practices and procurement practices.

CSBB has assessed the risks of modern slavery practices by segmenting the following risks.

#### **1. Risks that CSBB may cause modern slavery practices - a risk that CSBB operations (ie. employment practices) may directly result in modern slavery practices**

CSBB takes its employment obligations with respect to its 2,800 employees seriously.

All CSBB employees are engaged under an enterprise agreement, award or contract.

CSBB has considered the risks that directly relate to its employment practices, and does not consider employment to be a material risk due to the employment practices CSBB adopts.

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

CSBB aims to ensure that entities it has contracted with or has an ongoing relationship with are regularly reviewed in respect of their modern slavery practices.

Relevant areas of procurement operations identified as a possible risk 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
- key risk areas identified through 'risk segmentation analysis' herein in respect of CSBB's supplier base.

### **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**

This risk is broad in scope and sits across all supplier categories and goes beyond CSBB's direct suppliers (i.e. to subcontractors).

Whilst CSBB has limited visibility over the modern slavery risks of its subcontractors and indirect suppliers, efforts are made to assess and address risks related to the modern slavery practices of CSBB subcontractors and indirect suppliers.

For 2025, a risk assessment was undertaken, including a risk segmentation analysis for CSBB's supply chains and supplier base. The results of this analysis are set out in Criteria 4.

### **Criteria 4 - Actions taken by CSBB and owned and/or controlled entities to assess and address risks, including due diligence and remediation processes**

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Actions taken include:

#### **1. Risks that CSBB may cause or contribute to modern slavery practices – a risk that CSBB operations (ie. employment practices) may directly result in modern slavery practices**

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

These safeguards include:

- verifying identification documents prior to hiring to comply with legal standards
- determining wages based on job skills and experience and aligning with legally recognised collective bargaining agreements
- establishing a monitoring system to ensure adherence to a 38-hour workweek
- prioritising worker health and safety by implementing appropriate safeguards.

**Integrate findings and track performance:** CSBB has 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 their remuneration is commensurate with the minimum award rate if they are not covered by a contract.

**Communication:** CSBB is committed to promoting working conditions that are just and fair. CSBB is committed to continually updating its Modern Slavery Statement as new risks and trends emerge.

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

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

**Identify and assess:** In all significant 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, consideration is given to quoted costs to uncover labour rates that suggest workers may be paid rates which are below industry standard.

CSBB has formalised arrangements with some CSBB 'Pre-Qualified Suppliers' where rate cards are agreed and subject to periodic due diligence and updated if necessary. 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 below) to identify, assess and manage risk associated with its suppliers. If a significant risk is identified through any of these or any other means used by CSBB, CSBB will not enter into a business relationship with a supplier.

**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. A database of pertinent benchmarks is maintained.

**Communication:** 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, and updating its Modern Slavery Statement as new risks or trends emerge.

CSBB's 2024 Modern Slavery Statement has been made available to suppliers and all other interested stakeholders via a link to CSBB's website.

## **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:

### *Engagement with Australian Catholic Anti-Slavery Network (ACAN)*

CSBB has engaged with the ACAN since 2024, which provides various supports for CSBB and other Catholic Dioceses.

### *Supplier Engagement and Spend Overview (2025)*

The total spend with suppliers was approximately \$55 million.

The total spend and number of suppliers by supplier category has been categorised. This analysis is set out in graphs in Criteria 2. The analysis shows greater spending in construction and repairs and maintenance (17%), communication (14%) and professional expenses (11%). The number of suppliers with 2025 spend are greater in areas of curriculum and learning resources (25%), sports, performances and venue hire (22%) and printing supplies, awards, WHS and uniforms (9%).

As an additional step for this 2025 Modern Slavery Statement, CSBB credit card spending (~\$1.3 million) was analysed. This analysis was conducted to ensure that spend with suppliers not subject to CSBB's vendor due diligence was also analysed. The top 30 credit card suppliers by spend (those with more than \$5,000 in total spend in 2025) were analysed. Of these 30 suppliers, 16 fell into ACAN-identified high-risk modern slavery categories.

#### *Training for CSBB staff*

ACAN has provided CSBB with three Modern Slavery e-learning modules: Modern Slavery 101, Business Relevance, and Grievance and Remedy.

8 employees across CSBB Procurement, Finance, Governance and Legal teams have successfully completed all three modules and received their completion certificates.

#### *Risk segmentation analysis for CSBB's supplier base*

Since joining ACAN, CSBB has used the ACAN framework to measure risk. The ACAN Program also uses a globally recognised risk measurement system through Supplier Ethical Data Exchange (SEDEX). This aligns reporting entities with a methodology that combines global data about risks in different countries and industries with site-specific information from the SEDEX platform. SEDEX regularly updates the methodology to ensure it is aligned with new and emerging risks.

For ACAN members, modern slavery risks are defined by the ACAN Category Risk Taxonomy, a classification standard that identifies severity of actual or potential harm to people (saliency) in spend categories.

The ACAN Category Risk Taxonomy is based on sources such as:

- the Global Slavery Index
- the International Labor Organisation (ILO), including definitions of modern slavery
- the Bureau of International Labor Affairs (ILAB), U.S Department of Labor
- the Global Child Forum and UNICEF.

Other key factors are also used to determine the level of risk include:

- *Geography*: the country or location where a good is made or service is delivered
- *Industry*: the sector in which the making of goods or delivery of service occurred
- *Commodity*: the raw materials or components that comprise goods
- *Workforce vulnerability*: such as bonded visas, temporary migrants, women or children known to be employed in specific industry sectors;

- *Domus 8.7*: trends, cases, and risk intelligence identified through the Domus 8.7 remediation service, including grievances and remediation insights relevant to category and risk to workers.

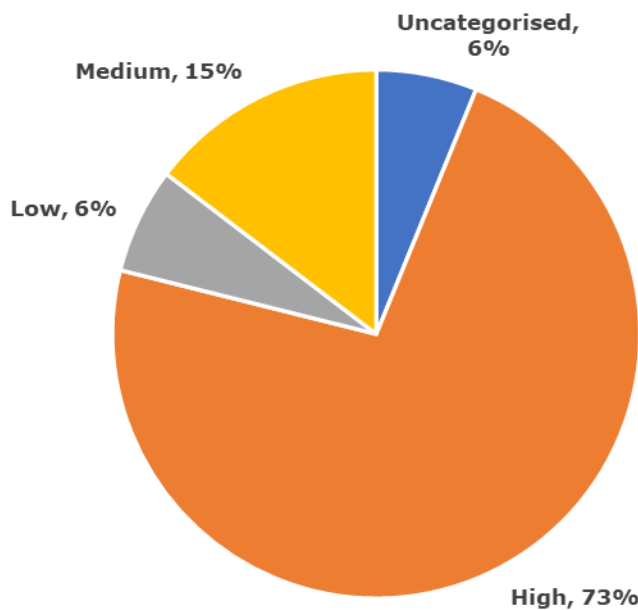
**Figure 3: ACAN Category Risk Taxonomy Classification**

High Risk	Medium Risk	Low Risk
<ul style="list-style-type: none"> <li>• Building and construction</li> <li>• Cleaning and Security</li> <li>• Events and event management</li> <li>• Facility management and property maintenance</li> <li>• Finance and Investment</li> <li>• Food and catering services</li> <li>• Furniture and office supplies</li> <li>• ICT Hardware</li> <li>• ICT Software and network services - offshore</li> <li>• Labour Hire</li> <li>• Linen, laundry and textile products</li> <li>• Medical devices and supplies</li> <li>• Transport, logistic and warehousing</li> <li>• Uniforms and PPE</li> <li>• Waste management services</li> </ul>	<ul style="list-style-type: none"> <li>• Advertising &amp; Marketing</li> <li>• ICT Software and network services - onshore</li> <li>• Utilities</li> <li>• Fleet management, consumables and maintenance</li> <li>• Travel and accommodation</li> <li>• Print / Mail Provider</li> </ul>	<ul style="list-style-type: none"> <li>• Professional services</li> <li>• Financial expenses</li> <li>• Government and agency fees</li> <li>• License / membership fees</li> </ul>

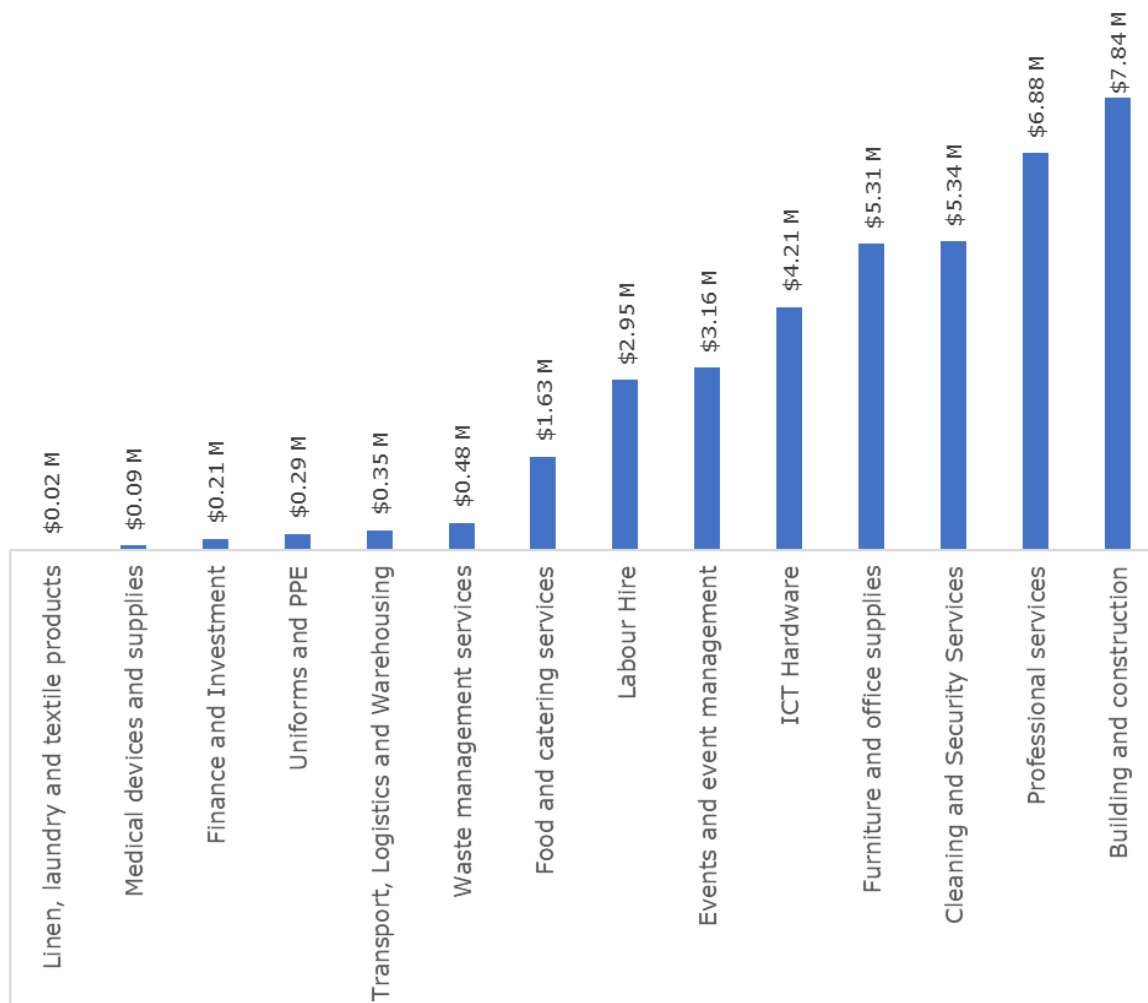
\*Pastoral and Payroll categories (excluding labour-hire and sub-contracting) are not in scope

It has been identified that 73% of CSBB’s 2025 spend was with suppliers in categories labelled as having a high risk of modern slavery by ACAN, and 77% of CSBB’s 2025 suppliers were in categories labelled as having a high risk of modern slavery by ACAN. Experiencing such a sizeable portion of high risk suppliers is not specific to CSBB, and CSBB continues to focus on working with high risk suppliers to more effectively manage and mitigate modern slavery risks.

**Figure 4: Spend per ACAN Category Risk Taxonomy**



**Figure 5: Spend in high risk procurement categories**



Going forward, CSBB will also work to further understand its own risk scoring and build up, and the build up of the risk scores of suppliers.

#### *Supplier category risk management*

Arrangements have been formalised with a panel of CSBB 'Pre-Qualified Suppliers' including suppliers in higher 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 aims to create a level of influence over the behaviours of these suppliers.

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 below) to identify, assess and manage risk associated with its suppliers. If a significant risk is identified through any of these, or any other means used by CSBB, CSBB will not enter into a business relationship with a supplier.

- In the area of uniforms, CSBB ensures 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. If these suppliers have overseas facilities, CSBB requires them to be subject to appropriate audits, diligence or business licensing.
- In the area of cleaning services and grounds and garden services, hourly rates offered by providers in their CSBB Pre-Qualified Supplier rate cards are reconciled with hourly rates embedded in the relevant industry award. Suppliers are 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 2025 CSBB continued to rationalise its supplier base to lower the total number of suppliers, to bring about:

- efficiencies in the end to end 'procure to pay' process, in parallel with the rollout of CSBB's Enterprise Management System (EMS)
- further enhanced value for money through CSBB system wide exclusive 'Preferred Supplier' and 'Pre-Qualified Supplier' panel arrangements
- further enhanced risk management around supplier compliance and 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 identified and treated through CSBB's engagement with ACAN and its platforms.

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 CSBB 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 suppliers who are pricing significantly below the market which in turn, may indicate modern slavery risks.

CSBB has a criteria in key tender due diligence material (tender documentation) that questions 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 shows a supplier's willingness to work with CSBB to address any modern slavery risks in its supply chains.

All relevant CSBB precedents incorporate a Modern Slavery clause. Additionally, when CSBB enters into a supplier or contractor's agreement for a contract of material value, CSBB will, if appropriate, ask that a modern slavery clause be inserted.

Whilst CSBB has limited visibility of modern slavery risks beyond its directly engaged suppliers, efforts are made to assess and address risks around modern slavery practices of subcontractors through understanding hourly rates paid to subcontractors where this information is provided as part of standard industry practice and through rate cards

provided to CSBB, and through requesting information from key suppliers around rates paid to subcontractors where a potential modern slavery risk is flagged.

#### *Internal safeguards and controls*

CSBB will look 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):

- 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), and grievance/whistleblower mechanisms available
- use ACAN data to measure effectiveness of modern slavery risk management
- analyse SEDEX data and encourage CSBB's suppliers to engage with the SEDEX platform
- take action in respect of supplier categories labelled as 'high risk' in analyses where possible and appropriate
- offer internal training on ACAN modern slavery e-learning modules for the most relevant CSBB staff
- hold modern slavery meetings
- reference modern slavery in relevant CSBB policies, including whistleblower policy.

#### ***Integrate findings and track performance:***

CSBB has 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 by suppliers including CSBB's suppliers
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 and will aim to have more of its suppliers engaged with the ACAN program (see below).

### *Supplier Engagement by ACAN*

The ACAN program provides supplier engagement support and data, enabling a systematic and comprehensive supply chain risk assessment through:

- evaluation of modern slavery risks within operations and supply chains, using the ACAN Risk Taxonomy
- ACAN Supplier Survey to identify supplier revenue, number of employees, countries of origin for goods sourced overseas, workforce contractual arrangements and SEDEX membership status
- supplier education on modern slavery and risk management in key areas: cleaning, building and construction, procurement of labour, labour hire and services, sourcing goods from overseas, grievance mechanisms and remediation
- onboarding suppliers to SEDEX platform
- SEDEX Self-Assessment Questionnaire (SAQ) completion to help suppliers to evaluate their practices against established standards and identify areas for improvement
- desktop review to identify key actions required from suppliers
- enhanced supplier screening using Know Your Client (KYC) intelligence software
- Corporate Social Compliance Audits to provide a point in time, objective and independent verification process of supplier alignment with local laws and worker wellbeing standards
- Domus 8.7 Index modern slavery statement assessment on selected suppliers in high-risk categories
- ACAN Prequalified Supplier Directory - a list of preferred suppliers accessible to Catholic organisations.

### **Communication:**

#### *Grievance and Remediation*

CSBB is committed to ensuring appropriate and timely remedy to people impacted by modern slavery, in accordance with the United Nations Guiding Principles on Business and Human Rights, Commonwealth Modern Slavery Act 2018 – Guidance for Reporting Entities, and relevant Australian laws. This includes providing for, or co-operating in, actions to address harms to people and root causes to mitigate future risks if CSBB is found to have caused or contributed to modern slavery.

CSBB's Whistleblower Policy is accessible to staff, service providers, contractors, volunteers and members of the public.

As an ACAN member, CSBB has access to Domus 8.7, an agency providing a remedy pathway and support to people (including CSBB's employees, suppliers and the employees of suppliers) impacted by modern slavery.

Where CSBB is directly linked to modern slavery by a business relationship, it is committed to working with the entity which caused the harm, to ensure remediation and mitigation of its recurrence. Remediation obligations and expectations are included in CSBB contracts to ensure victim-centered remediation processes are implemented to the satisfaction of CSBB.

## **Criteria 5 - How CSBB assesses the effectiveness of these actions**

The elements of vendor 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 continued 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.

Based on ACAN's assessment of CSBB's 2025 supplier base:

569 ACAN supplier surveys had been completed at the end of 2025 (up from 366 at the end of 2024). Of these suppliers:

- 271 were invited to join SEDEX (up from 52 at end of 2024)
- 68 were registered on SEDEX (up from 47 at end of 2024)
- 67 completed the SEDEX questionnaire (up from 18 at the end of 2024).

These measures demonstrate continuous improvement.

The table below also provides a comparative measure of supplier engagement and program activities to measure progress and inform future action planning.

	<b>ACTIVITY</b>	<b>2024</b>	<b>2025</b>
<b>INTERNAL / STAFF</b>	Hours spent on modern slavery activities	32	54
	Individual staff completed e-learning	0	8
	E-learning modules completed	0	24
<b>EXTERNAL / SUPPLIER ENGAGEMENT</b>	Number of suppliers across high-risk categories	1,163	1,347
	Number of ACAN Supplier Surveys completed	366	569
	Supplier staff attending ACAN webinars	N/A	7
	Invited to join SEDEX	52	271
	Joined SEDEX	47	68
	SEDEX questionnaire completed	18	67

## **Criteria 6 - Process of consultation with owned or controlled entities**

CSBB does not own or control any other entities.

## **Criteria 7 – Other relevant information**

No other relevant information.