



CESL Procurement

Modern Slavery Policy

Vision

The vision for Catholic Education Sandhurst Limited (CESL) is to provide, in partnership with our families, stimulating, enriching, liberating and nurturing learning environments in each of the Catholic School communities within the Diocese. At the heart of this vision is our commitment to the ongoing duty of care that we have for the safety, wellbeing, and inclusion of all children and young people.

We believe:

- that the values of the Gospel are central to who we are
- what we do, and how we act
- that we have a vital role in the mission of the Catholic Church to imagine and seek new horizons while respecting our Tradition
- that a strong sense of community is dependent on the quality of our collegial relationship.
- that each person's potential is fostered through the dedicated ministry of Catholic Education
- In leadership encompassing vision, innovation and empowerment.

Background

The term modern slavery describes situations where coercion, threats or deception are used to exploit people and undermine their dignity and freedom. Modern slavery practices violate universally

recognised human rights, are crimes and pose a serious business risk to CESL operations and reputation.

The Commonwealth *Modern Slavery Act 2018* (the Act) and Guidance defines modern slavery as including eight types of serious exploitation reflected in the Australian Criminal Code Act 1995. Appendix 1 of this Policy outlines the types of modern slavery practices relevant to businesses and global supply chains.

Purpose

The purpose of this policy is to prevent modern slavery by managing and mitigating modern slavery risk within our business operations and supply chains.

This policy enables CESL to ensure that modern slavery does not flourish within our operations, business relationships and extended supply chains. This policy also provides a robust framework to ensure compliance with the reporting requirements of the Act.

Scope

All CESL shall comply with this policy and ensure its core principles are implemented. This policy applies to all staff, including direct employees (full-time, part-time and casual), volunteers, consultants, labour hire employees, as well as contractors and sub-contractors and their employees.

Principles

Catholic social teaching calls for the dignity of work, the rights of workers and advancing the common good. These are the principles that guide this policy.

The following principles inform the implementation of this policy within our organisation:

- CESL will not knowingly use or contribute to modern slavery practices in any form.
- CESL will actively work to identify and eliminate modern slavery practices from our operations, business partnerships and supply chain.
- Any form of exploitative treatment, punishment, abuse of labour rights, coercive control (physical, mental, psychological or financial) of workers in CESL operations or supply chain is unacceptable.

- CESL shall comply with all relevant laws and regulations regarding worker recruitment, remuneration, working conditions and freedom of association.
- CESL final purchasing decisions shall not be based on price alone. Ethical business processes are an essential part of our value for money and 'fit for purpose' considerations. This includes consideration of worker living wage mechanisms and responsible recruitment of workers.
- CESL will continue to support our suppliers and business partners to assess and address modern slavery risks and take action to improve transparency, traceability and accountability for modern slavery practices and impacts in our collective supply chains.

Actions to prevent and manage modern slavery risk

Our modern slavery risk management plan is underpinned by ethical business practices and in consideration of all our stakeholders (including people who are at-risk of and/or experience modern slavery practices). Key elements of our plan are summarised in Appendix 2.

To put this policy into practice the following actions are required of our workers, business partners and suppliers.

Management, staff and contractors

- Our Board of Directors has overall responsibility for ensuring this policy and its implementation complies with relevant Catholic social teachings, and legal and ethical obligations.
- The executive leadership team has ultimate responsibility for managing modern slavery risk within CESL.
- All levels of management are responsible for ensuring their staff are aware of this policy, are provided with regular training in its application and have sufficient resources for its implementation.
- Anyone working for CESL or on our behalf is expected to implement the following measures:
 - o ensuring that the identification, prevention, management and mitigation of modern slavery risk is a core responsibility of all staff
 - o business operations or relationships that knowingly support, facilitate or encourage worker exploitation or modern slavery practices are strictly forbidden

- o any actual or suspected activity that could breach this policy must be reported immediately.
- Relevant external stakeholders shall be engaged to support this policy (for example suppliers, contractors, joint venture or other business partners).
- Anti-slavery clauses shall be incorporated into procurement tenders and contracts which include the right to audit, review documentation and interview workers.
- Supplier reviews (including self-assessment questionnaires) shall be undertaken to assess levels of modern slavery risk, commitment, and capacity to manage identified risks. This includes any new company that wants to do business with CESL.

Suppliers and business partners

- CESL will actively engage with suppliers to promote this policy and assist to develop their capabilities to identify and manage modern slavery risks.
- CESL expects suppliers to share our goal and values in relation to ending modern slavery.
- Suppliers are expected to support CESL efforts to assess the levels of risk within their operations and supply chain, and to gauge their commitment and capability to manage modern slavery risks.
- Suppliers shall demonstrate how they identify, prevent, manage and mitigate modern slavery risk in their operations and supply chains.

What to do if slavery is suspected or discovered

Internal reporting of actual or potential modern slavery risks by staff is expected. Staff shall immediately report any suspected violations of the policy or other illegal or unethical conduct.

Information is confidential and there shall be no retribution or retaliation for reports made in good faith.

Suppliers are also required to report suspected or actual modern slavery practices, indicators or red flags immediately without fear of retribution, retaliation or loss of business with us. CESL commits to working with our suppliers to address issues, ensure effective remedy and implement prevention measures.

If a supplier or any other person outside CESL provides information to a staff member about suspected or actual modern slavery practices, indicators or red flags within our organisation or supply chain, the information must be immediately passed onto their team leader for escalation.

Non-compliance with this policy

Staff who knowingly breach this policy may face disciplinary action. This could, in the most severe circumstances include dismissal for misconduct or gross misconduct and if warranted legal proceedings may be commenced.

CESL retains the right to terminate its relationship with individuals, suppliers and organisations working on its behalf or engaged by it if they breach this policy.

Roles and Responsibilities

Approval Authority

CESL Board

Responsible Officer

Chief Operating Officer

Review

This policy is scheduled for review every 3 years or more frequently if appropriate.

Revisions made to this document

Date	Description of Revision (s)
February 2025	New Policy approved
February 2028	Review Date

Appendixes

Appendix 1: Types of modern slavery relevant to business

Appendix 2: Modern Slavery Risk Management Program - Key Elements