

MODERN SLAVERY STATEMENT

2024

Reporting Period 1 January 2024 - 31 December 2024



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This Statement has been produced on behalf of:

Catholic Healthcare Limited

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Criterian 1 ORGANISATIONAL STRUCTURE

Brief Statement from the Board Chair & Chief Executive Officer

Catholic Healthcare is committed to upholding the human dignity of those who work with us, whether directly or indirectly. We also support actions contributing to a more compassionate and humane society, including Australia's Modern Slavery Laws.

Our organisation firmly rejects modern slavery and is dedicated to employing all reasonable measures available to ensure we do not engage in any modern slavery activities.

We focus on providing care and support for seniors through our residential aged care homes, retirement living communities, and home and community services. Catholic Healthcare collaborates with a diverse range of suppliers for goods and services. We strive to raise awareness about the risks of modern slavery and ensure that our supply chains consist of reputable providers. Catholic Healthcare is committed to educating employees about the issue of modern slavery and continuously improving our procurement practices. Our focus is on the ethical production and supply of goods and services.

We are proud to present Catholic Healthcare's fifth Modern Slavery Statement and commend the officers of our organisation for their zealous embrace of the cause of eradicating modern slavery.



Stephen Teular

Stephen Teulan, Board Chair



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Josh McFarlane, Chief Executive Officer

Catholic Healthcare Limited

This Modern Slavery Statement was approved by the principal governing body of Catholic Healthcare as defined by the Modern Slavery Act 2018 (Cth) ("the Act") on 7th May 2025.

This Modern Slavery Statement is signed by a responsible member of Catholic Healthcare as defined by the Act.



ABOUT US

Catholic Healthcare is a trusted, leading not-for-profit provider of residential aged care, home care and retirement living in New South Wales and Southeast Queensland. We have a strong and proud history of providing care and support to people of all faiths, backgrounds and ethnicities for 30 years.

We are passionate about enriching our residents' and clients' lives and offer services to nurture the body, mind and spirit. Our model of care is based upon relationships using a person-centred, holistic approach that focuses on the wellbeing of older people, with a continuum of care that is tailored, flexible and covers every stage of life's journey. Catholic Healthcare operates 41 residential aged care homes and 13 retirement living communities and provides home and community services to 6,500 clients.

Catholic Healthcare's mission is to promote the dignity, life, and spirituality of older people through connected and inclusive communities.

We are guided by our values of courage, compassion and integrity.

As a trusted, leading not-for-profit entity, we have a strong and proud history of providing residential aged care, home care, and retirement living across New South Wales and Southeast Queensland. Catholic Healthcare has been operating for 30 years and provides care and support to people from all faiths, backgrounds, and ethnicities.

Catholic Healthcare was founded in 1994 by the Bishops of the Province of Sydney at the request of six founding members: Sisters of Charity, Sisters of St Joseph (NSW Province), Sisters of Mercy (Singleton), Little Company of Mary, Sisters of St John of God and Brothers of St John of God.

Guided by our Members and Trustees, Catholic Healthcare has a single operating entity, Catholic Healthcare Limited. Catholic Healthcare Limited operates as an integrated provider of aged care services through two (2) divisions:

Operations Residential aged care homes Retirement living communities Social housing for seniors Home Care Packages • Commonwealth Home Support Services Homelessness services Hoarding and squalor services Assessment services for seniors **Corporate Services** Mission Human Resources Information Technology Finance Property Strategy and Growth · Practice, Quality and Risk Company Secretariat CFO Office

Modern slavery oversight

Catholic Healthcare's Modern Slavery Taskforce comprises Modern Slavery Liaison Officers from Finance (Procurement), Human Resources, Mission, Property and Practice, Quality and Risk. These roles report to the Chief Financial Officer.

Criterion 2

OPERATIONS AND SUPPLY CHAIN

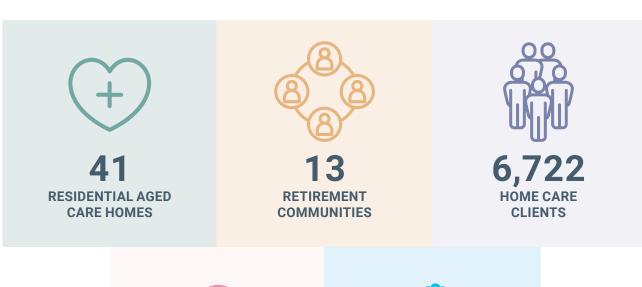
Our Governance Framework

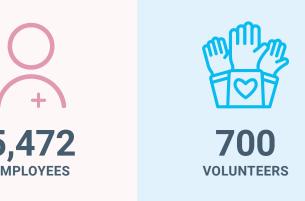
As a Catholic service provider, Catholic Healthcare is concerned with the welfare of all persons, particularly the most vulnerable. Our approach to care is informed by the Parable of the Good Samaritan.

Our Trustees and Board, who both have oversight and governance of Catholic Healthcare's mission, are conscious of the risks of modern slavery infiltrating supply chains and, as a result, actively encourage management to progress initiatives aimed at identifying and addressing modern slavery risks.

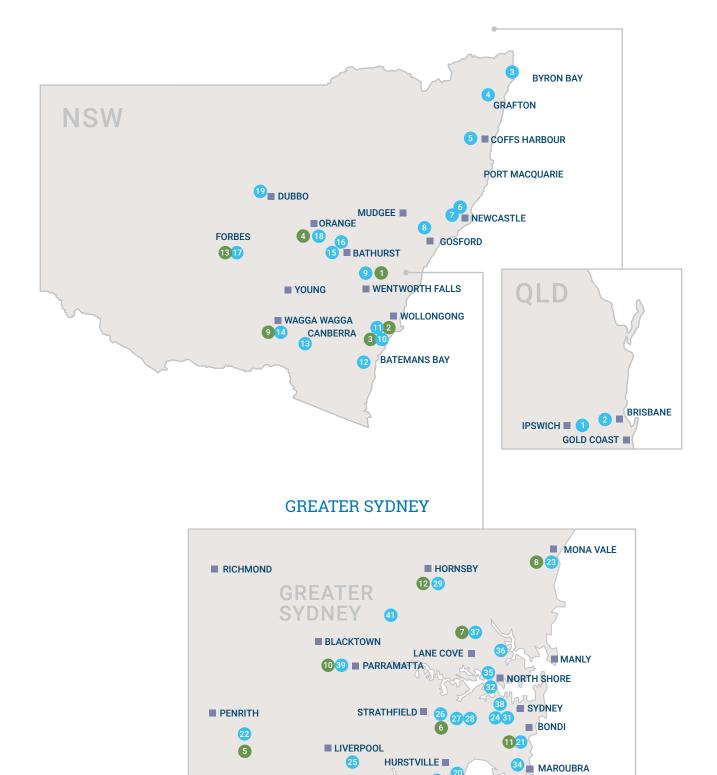
AT A GLANCE

As at 31 December 2024.





Our locations



40 ■ CASULA

■ CRONULLA

Our locations

RESIDENTIAL AGED CARE

- 1 VILLA MARIA CENTRE Eastern Heights
- 2 VILLA MARIA Fortitude Valley
- 3 COOLAMON VILLA Mullumbimby
- 4 ST FRANCIS AGED CARE
 Grafton
- 5 ST JOSEPH'S AGED CARE Coffs Harbour
- 6 CHARLES O'NEILL Mayfield West
- 7 ST JOHN'S VILLA New Lambton
- 8 OUR LADY OF LORETO GARDENS Hamlyn Terrace
- 9 BODINGTON Wentworth Falls
- 10 ST MARY'S Berkeley
- 11 VILLA MARIA CENTRE
 Unanderra
- 12 MARANATHA LODGE Batehaven
- 13 BLAKENEY LODGE Tumut
- 14 THE HAVEN Wagga Wagga
- 15 MACQUARIE CARE CENTRE
 Bathurst
- 16 ST CATHERINE'S Bathurst
- 17 JEMALONG RESIDENTIAL VILLAGE Forbes
- 18 ST FRANCIS AGED CARE Orange
- 19 HOLY SPIRIT DUBBO Dubbo
- 20 BETHLEHEM HOUSE Kogarah
- 21 BRIGIDINE HOUSE Randwick

- 22 EMMAUS VILLAGE Kemps Creek
- 23 GEORGE MOCKLER HOUSE Mona Vale
- 24 GERTRUDE ABBOTT AGED CARE Surry Hills
- 25 HOLY SPIRIT AGED CARE Revesby
- 26 HOLY SPIRIT CROYDON Croydon
- 27 LEWISHAM NURSING HOME Lewisham
- 28 LEWISHAM RETIREMENT HOSTEL Lewisham
- 29 MCQUOIN PARK Wahroonga
- 30 PERCY MILES VILLA Kirrawee
- 31 THE SISTER ANNE COURT Surry Hills
- 32 ST ANNE'S AGED CARE Hunters Hill
- 33 ST BEDE'S HOME South Hurstville
- 34 ST JAMES VILLA Matraville
- 35 ST JOSEPH AGED CARE Hunters Hill
- **36 ST PAUL'S**Northbridge
- 37 ST PETER'S Lane Cove North
- 38 VINCENTIAN AGED CARE SERVICE East Sydney
- 39 ST HEDWIG VILLAGE Blacktown
- **40 HOLY SPIRIT** Casula
- 41 MACKILLOP HOUSE Norwest

RETIREMENT LIVING

- 1 AQUINAS COURT Springwood
- 2 BISHOP McCABE RETIREMENT VILLAGE Towradqi
- 3 ST MARY'S RETIREMENT LIVING Berkeley
- **4 THE BAILLY** Orange
- 5 EMMAUS RETIREMENT VILLAGE Kemps Creek
- 6 THE BRIGHTON Croydon
- 7 ST PETER'S GREEN Lane Cove North
- 8 CHARLES O'NEILL Mona Vale
- 9 THE HAVEN Wagga Wagga
- 10 ST HEDWIG VILLAGE Blacktown
- 11 STRATHALLEN VILLAGE Randwick
- 12 MCQUOIN PARK RETIREMENT LIVING Wahroonga
- 13 JEMALONG RESIDENTIAL VILLAGE Forbes

HOME CARE

You will find us in regional and metro areas across NSW and South East QLD. Only key locations are shown here, please enquire to find a service near you.



Our Supply Chain

Catholic Healthcare sources a wide range of goods and services to support the delivery of aged care services to our clients and residents from more than 2,000 suppliers. These range from sophisticated global service providers to sole traders in the following categories:

- Food and beverages sourced through providers who provide quality products locally or regionally.
- · Linen and laundry supplies.
- Medical and care supplies including medications, incontinence aids, Protective Personal Equipment (PPE).
- Property supplies and services ranging from those required for new, and refurbishment of, residential aged care homes and retirement living communities and property maintenance services for all existing properties.

- Information technology services ranging from system applications for Catholic Healthcare buildings, telephone and mobile devices and computer equipment.
- Marketing and communications services including printing, publications and website design.
- Workforce supplies including employees, consultants and agency workforce.
 This includes a small number of workers on visas.

Some suppliers themselves source goods that are on-sold to Catholic Healthcare. Some of these goods may be sourced from foreign countries.

Criterian 3 MODERN SLAVERY RISKS

Modern Slavery Risks in Operations and Supply Chain

Catholic Healthcare understands that some goods (including their component parts) may have been impacted by modern slavery practices. As explained in our 2021 Modern Slavery Act Statement, to better understand these risks, we undertook a comprehensive analysis of the top 50 suppliers by spend in our organisation to determine which and how many of our top suppliers can be categorised as 'high-risk'. We currently analyse new suppliers as we engage them.

To expand upon this analysis, in 2024, we maintained our membership with the Australian Catholic Anti-Slavery Network (ACAN) to support us in eradicating Modern Slavery practices from our organisation.

Operational Risks

Our People

Catholic Healthcare employs close to 5,500 individuals including full time, part time and casual workers. Around 83% of our workforce identify as female which is recognised to be common among the caring professions. Although we do not regularly collect data on the country of origin of our employees, it is known that we employ a diverse workforce with employees coming from many nationalities including Australian, European, Asian, North and South American and African continents.

Catholic Healthcare has invested in a Human Resources Information System, which now allows for the collection of more accurate data on the demographics of our workforce.

Catholic Healthcare recognises that labour hire is a high-risk category in our supply chain but is nonetheless necessary for our operations. Most of our care workforce is employed under Enterprise Agreements approved by the Fair Work Commission, making the risk of modern slavery in our directly employed workforce low. A smaller percentage of workers in our corporate services divisions are employed under individual contracts of employment. Agency workers, when required, such as registered nurses (RN), enrolled nurses (EN), assistants in nursing (AIN) and care workers, are engaged under agency agreements with external suppliers. Other service providers, including allied health professionals and hairdressers, are engaged under individual contractor arrangements that allow for negotiation.

The use of employment agencies and labour hire contractors to procure agency workers represents a modern slavery risk category. To address this, we have updated our standard agency contracts to include robust anti-slavery clauses. These clauses ensure contractors comply with our Modern Slavery Policy and require them to report instances of modern slavery to Catholic Healthcare. To date, no contractors have raised any issues with these standard clauses.

Supplier Risks

In 2024, we reviewed the original risk assessment and concluded that it is still valid. The original risk assessment mapped the potential for modern slavery practises across our top 50 suppliers by spend so as to improve our understanding of the key procurement categories that contain high risks of modern slavery.

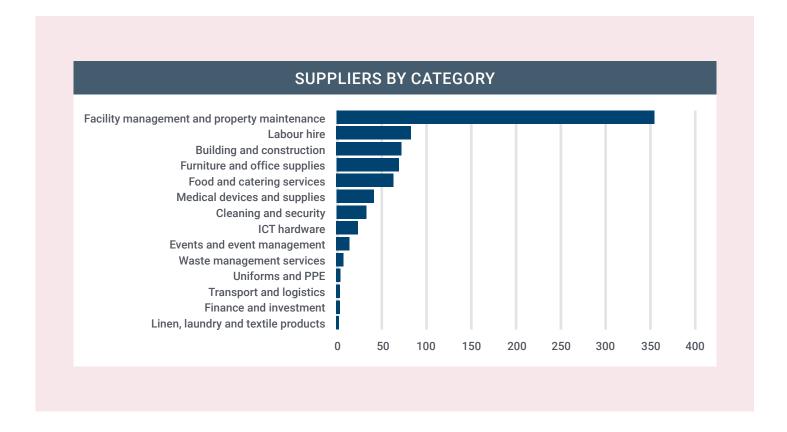
The list below was developed by ACAN covering a range of organisations and we have identified the following high-risk categories as relevant to our organisation:

- Medical equipment, supplies and consumables
- Building, construction, and fabrication services
- Medical devices and supplies
- Food, beverage and hospitality
- Property, facility, and maintenance
- Cleaning services
- Labour hire
- Office and teaching supplies, furniture and services
- Waste management
- Clothing, PPE and other personal equipment
- Linen and laundry
- Events, excursions, camps, and entertainment
- · Security services.





In 2024, we identified 782 suppliers in high-risk categories, 45% of which are in Facilities Management and 11% in Labour Hire.



Criterian 4

STEPS TAKEN TO ADDRESS MODERN SLAVERY RISK

2024 Modern Slavery Risk Management Initiatives

Achievements

Highlights include:

- Continuation of a transition to in-house cleaning services in our residential aged care homes, with the last home transitioning in November 2024.
- A reduction in the use of outsourced nursing agency staff while continuing a comprehensive review and consolidation of the use of nursing agencies including a third-party risk assessment of agencies engaged, improved controls via a booking platform and all agencies subject to Catholic Healthcare's standardised contracts (including modern slavery clauses).
- 83% of uniform purchased from 3 SEDEX registered manufacturers.
- All key Catholic Healthcare food suppliers also registered with SEDEX and all new food distributors are questioned on their ethical sourcing arrangements.
- In 2024, Catholic Healthcare's Modern Slavery Liaison Officer (MSLO) group was expanded to incorporate all main business units to focus on action plans specific to each unit.

Catholic Healthcare continued to make progress in addressing modern slavery risks within our operations during the 2024 reporting period. Our taskforce, comprising members from across our organisation, including Procurement Services, Legal, Mission, and the Executive, has continued to roll out educational initiatives relating to modern slavery. We have also made further improvements to organisational policy and procedures.

Our plans for 2025 and beyond

In 2025 and beyond, Catholic Healthcare intends to continue extending modern slavery training throughout the organisation, strengthening our policies and procedures, promoting further supplier involvement in anti-modern slavery actions, and reducing our reliance on outsourced services in high-risk roles. Further details are set out in this Statement. We also intend to review our supplier management systems to improve our understanding of supplier risks.



Baseline Data

This dataset provides a foundational assessment of supplier engagement, transparency, and modern slavery risk management. It helps identify key trends, areas requiring further attention, and opportunities for strengthened due diligence. The data points reflect supplier visibility and compliance activities, ensuring a comprehensive approach to ethical sourcing and governance.

	ACTIVITY	2023	2024
INTERNAL / EMPLOYEES	Hours spent on modern slavery activities	240	210
	Individual employees completed e-learning	157	175
	E-learning modules completed	298	316
EXTERNAL / SUPPLIER ENGAGEMENT	Total number of suppliers	2373	2226
	Number of suppliers with visible contact information and ABN	128	2218
	Number of suppliers across high-risk categories	128	782
	Number of ACAN Supplier Surveys completed (cumulative)	62	271
	Supplier employees attending capacity-building webinars	69	41
	Invited to join SEDEX (cumulative)	31	66
	Joined SEDEX (cumulative)	15	72
	SEDEX SAQ completed (cumulative)	22	64
DOMUS 8.7 EXTERNAL REFERRALS	Contacts made via the worker voice/grievance mechanism	0	33
	Referrals for advice and assistance	0	0
	Individuals identified or referred for modern slavery assessment	0	0
	Individuals with modern slavery cases remediated	0	0

This data serves as a baseline for monitoring supplier compliance and engagement, allowing for evidence-based decision-making in ethical procurement strategies.

The increase in the number of external suppliers engaged reflects a change in focus from the top 128 in 2023 to whole spend data in 2024.

- Catholic Healthcare continues to consolidate its policies and procedures concerning modern slavery and to evolve practices that prevent modern slavery in our organisation or supply chains.
- Catholic Healthcare identified outsourced cleaning at our residential aged care homes as a high-risk activity and commenced a program to bring this inhouse in 2023, which continued in 2024. Cleaning is now under the direct control of Catholic Healthcare management in 100% of homes.
- To support our in-house services, we have engaged the support services of an Indigenous-owned cleaning contractor, Killara Services. Killara Services backfills roles for Catholic Healthcare employees on annual leave and when positions become vacant until they are refilled.
- Catholic Healthcare continues to comprehensively review and consolidate agencies used for nursing services. In 2024, this included a third-party risk assessment of agencies for modern slavery risk, the introduction of a booking platform process and 100% engagement under standardised contracts (which include modern slavery clauses). Catholic Healthcare has further reduced the associated risk by reducing the number of shifts booked with agencies in 2024 by 40% compared to 2023.

Case Study: Risk Assessment of Nursing Agencies Used in 2024

In 2024, Catholic Healthcare undertook a modern slavery risk assessment of the nursing agencies engaged within its supply chain, using an independent third-party consultant. The assessment, completed by 29 out of 42 invited nursing agencies (69% participation rate), aimed to identify potential risks of modern slavery and evaluate the effectiveness of existing controls.

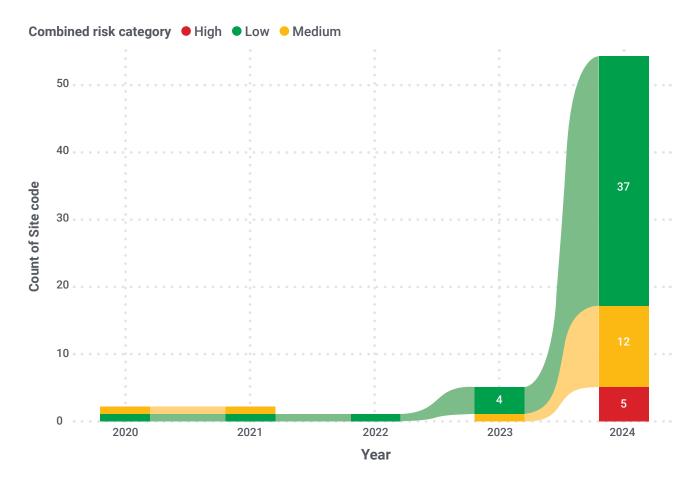
The survey results included an aggregated inherent risk score across all agencies of 39.5 out of 100, reflecting the moderate level of structural risk within this industry sector. However, through existing policies and procedures, the unmitigated risk score was reduced to 11.6 out of 100, demonstrating some effective mitigation efforts across the nursing agencies surveyed.

Nevertheless, areas for improvement were identified, such as some suppliers not having formal vulnerability assessments of their workers, which limited their capacity to identify exploitation risks. Additionally, some suppliers did not have policies prohibiting the use of non-compliant recruiters and lacked policies ensuring return transportation for migrant workers to safeguard against forced labour.

In 2025, Catholic Healthcare will complete a detailed contract renewal process with nursing agencies and including strengthening modern slavery risk management, by requiring modern slavery policies, annual risk assessments, and worker vulnerability assessments. By embedding these measures into its nursing agency selection process Catholic Healthcare aims to continually improve transparency, protect vulnerable workers, and ensure modern slavery risks are mitigated in its supply chain.

- Catholic Healthcare continues to purchase uniforms from one Australian distributor with the supply chain limited to three overseas manufacturers now covering 83% of purchases. Both the distributor and manufacturers are registered with SEDEX.
- All key Catholic Healthcare suppliers are now registered with SEDEX and all new food distributors are questioned on their ethical sourcing arrangements from food suppliers.
- Other high-risk suppliers continue to be encouraged to register for SEDEX and are invited to attend ACAN contractor training. In 2024, 54 of our suppliers' sites have completed the SEDEX Self-Assessment Questionnaire, bringing the total of assessments completed to 64. Five of these sites have a high-risk inherent and site practices score, which will be included in our 2025 desktop review activities.

Count of Site code by Year and Combined Risk Category



SEDEX

The Supplier Ethical Data Exchange (SEDEX) is a global membership organisation providing organisations with tools to manage and share information about ethical sourcing and supply chain transparency. SEDEX helps organisations assess, track, and improve their supply chain practices related to labour standards, health and safety, environment, and business ethics, aiming to reduce risks like modern slavery.

The core service of SEDEX is its platform, which allows businesses to store and share audit data, conduct self-assessments, and collaborate with suppliers on ethical practices. Suppliers can register on SEDEX to disclose key information about their operations, including compliance with labour rights, working conditions, and environmental impact.

As an example, Catholic Healthcare's preferred supplier for uniforms is Uniformity, which is a registered SEDEX member linked to Catholic Healthcare and whose SEDEX self-assessment questionnaire is 100% complete. The uniform supply chain then includes three manufacturers (producing 83% of our uniforms), all of which are also registered with SEDEX and also have a monitoring/completion score of 100%. In addition, the factories are WRAPcertified, meaning they are independently audited to ensure compliance with ethical labour standards.

By engaging with SEDEX in this way, Catholic Healthcare fosters a more transparent, compliant, and ethical supply chain, ultimately reducing the likelihood of contributing to modern slavery practices.

- Wages for internal employees are defined by a legally recognised collective bargaining agreement and are based on job skills and experience. Other HR-related actions Catholic Healthcare has taken in 2024 to improve the working conditions of its employees include: increasing pay rates, increasing upskilling and learning opportunities; shift bidding software to give workers more flexibility in the hours they work and the location they work; assisting some employees with Nominations for Employer Sponsored Permanent Residency and recognition programs.
- Catholic Healthcare has prioritised internal education and establishing the structures and resources needed to support the antimodern slavery efforts of the organisation to ensure that changes made are monitored for effectiveness. To this end, Catholic Healthcare finalised an organisational Modern Slavery Policy in 2022. This policy is published on Catholic Healthcare's Resource Centre and is made available to contractors through a Resources for Contractors page. The Modern Slavery Policy is regularly reviewed.
- After joining ACAN in 2020, Catholic Healthcare used its resources, including ACAN educational tools, to focus on what modern slavery means to Catholic organisations. Catholic Healthcare has also commenced modern slavery awareness training for those in key roles, including senior members of the Modern Slavery Taskforce and, in 2022, the Catholic Healthcare Leadership team. We plan to incorporate education about modern slavery into the onboarding process of new employees.



Remediation

Catholic Healthcare is committed to providing appropriate and timely remediation to individuals affected by modern slavery in accordance with the needs of the victim and relevant laws and guidelines, including the UN Guiding Principles on Business and Human Rights and the Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities.

Remediation includes taking action to address harm to individuals impacted by modern slavery and to mitigate future risks. Due to the complexity of remediation, specialised resources are required to ensure the best outcomes for individuals affected by modern slavery. To address this, Domus 8.7, a not-for-profit established by the Catholic Archdiocese of Sydney, provides remedy pathways and a confidential advisory service to individuals affected by modern slavery.

In future, Domus 8.7 will triage cases referred to it by Catholic Healthcare and refer victims to internal or external specialists who can provide support, advice, and assistance regarding legal, social, and human rights responses to cases of modern slavery. It will also partner with international organisations to ensure supply chain remedial action and prevention are available.

Through Domus 8.7, Catholic Healthcare aims to help individuals impacted by modern slavery to achieve outcomes that can be reported and used to continuously improve risk management and operational response. Any future grievances related to modern slavery are to be mediated through Domus 8.7, and Catholic Healthcare is committed to working with any entity that caused harm to ensure remediation and prevention of recurrence.

In 2024, Catholic Healthcare did not find any cases of modern slavery in its operations and supply chains.

Criterion 5

EFFECTIVENESS OF STEPS TAKEN

No instances of modern slavery have been reported or found within our operations or associated with our supply arrangements. However, we appreciate that this does not necessarily mean that we do not have any cases of modern slavery. Catholic Healthcare, therefore, continues to review the effectiveness of our Modern Slavery Risk Management procedures, including assessment of high-risk suppliers across different Catholic Healthcare departments and employee and supplier awareness training.

Monitoring is essential to ensure that policies and procedures are effective and operating. We seek to track our progress in relation to modern anti-slavery action by setting goals and future action plans for each year.

We will continue to use goal setting/action plans and assessment of completion against these as our primary metric for measuring the success of modern slavery initiatives. We will also continue to review and evaluate our performance.

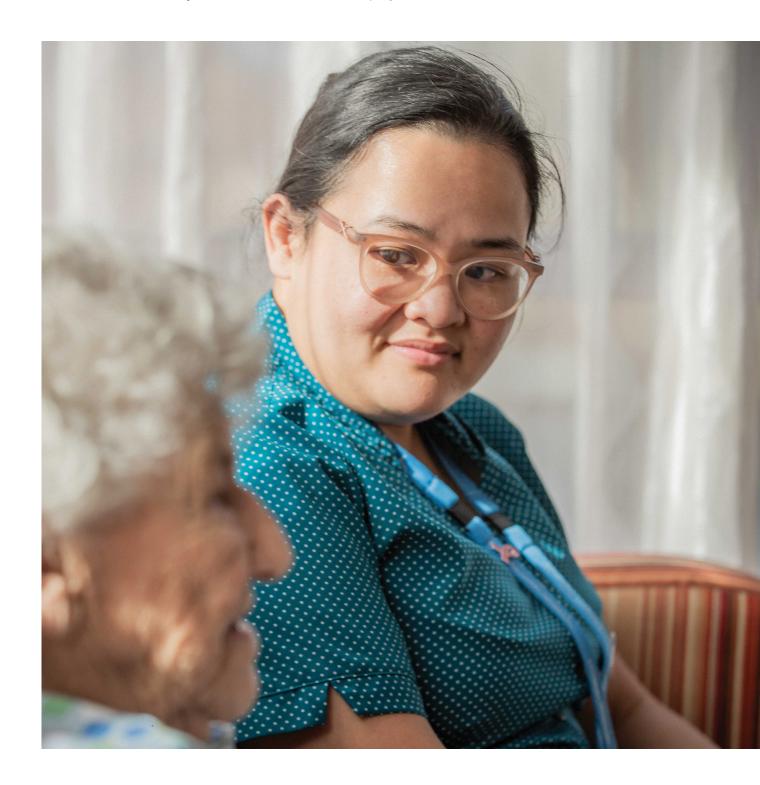
Future actions planned are highlighted in CRITERION 7. Catholic Healthcare has incorporated training for its key employees and as at 31 December 2024, the following training has been conducted:

- Modern Slavery 101 Training –
 Procurement employees, Leadership
 team and all Board Members, completed
 by 170 employees.
- Modern Slavery Business Relevance
 Training completed by 146 employees.



Criterion 6 INTERNAL CONSULTATION

Catholic Healthcare has one current operating entity, Catholic Healthcare Limited. Consultation is as described in this statement, primarily through the mechanism of the Modern Slavery Taskforce referred to on page 5.



Criterion 7 ANY OTHER RELEVANT INFORMATION

The risk of modern slavery has been identified as a continual high-priority area and embedded in our broader Environmental, Social and Governance (ESG) action plans for 2025. Working with our Risk Management team our ESG team will ensure the Enterprise Risk Management Framework incorporates processes to continuously identify, manage and mitigate modern slavery risks.

Planned future actions to further mitigate modern slavery risks include:

- Continue transitioning to bring cleaning services inhouse for residential aged care homes.
- Investigate the opportunities to bring linen services inhouse.
- Work towards implementing a supplier and contract management system to streamline communications and process supplier data on modern slavery activities.
- Continue to arrange ACAN modern slavery training for new contractors and an expanded group of existing suppliers via an expanded MSLO group.
- Review contractor arrangements as part of a larger contractor engagement project and consolidate supplier numbers to reduce modern slavery risks.
- Continue to identify high-risk suppliers, invite these to modern slavery contractor training, and update supplier-preferred listings to incorporate their stance on modern slavery.
- Update and disseminate a Supplier Code of Conduct.

- Reinforce with all high-risk vendors
 the importance of publishing Modern
 Slavery Statements and/or policies by
 requiring these to be shared with Catholic
 Healthcare as part of pre-qualification via
 a new ERP and supplier on-boarding
 system commencing November 2025.
- Update our supplier preferred lists regarding their compliance with modern anti-slavery requirements.
- Update our supplier evaluation process with minimum ethical sourcing requirements, including exploring the development of an ethical practices questionnaire as part of supplier onboarding with the new system.
- Complete a detailed contract renewal process with nursing agencies, including strengthening modern slavery risk management by requiring modern slavery policies, annual risk assessments, and worker vulnerability assessments.

Specifically in connection with Property:

- Continue the project to ensure all Property contracts and agreements include relevant modern slavery clauses and review as part of the Property/Legal contracts workshop.
- Continue to review modern slavery policies in place with key/largest suppliers and action any concerns.
- Expand modern slavery awareness training to all Property employees and key suppliers.



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