



ARCHDIOCESE
OF BRISBANE

MODERN SLAVERY STATEMENT

2025

The Corporation of the Trustees of the
Roman Catholic Archdiocese of Brisbane

Disclosure

This statement has been made on behalf of The Corporation of the Trustees of the Roman Catholic Archdiocese of Brisbane. This statement covers all entities owned or controlled by The Corporation of the Trustees of the Roman Catholic Archdiocese of Brisbane.

We respectfully acknowledge Aboriginal and Torres Strait Islander people as the First Peoples of this country and especially acknowledge the traditional owners on whose lands we live and work throughout the Catholic Archdiocese of Brisbane.

We also acknowledge Elders, past, present and emerging and pay tribute to those who have contributed to the social, economic, cultural, political, and spiritual life of our community.

This acknowledgement affirms our commitment to social justice and the importance of healing and reconciliation between Indigenous and non-Indigenous peoples.

ABN 25 328 758 007 Archdiocese of Brisbane

227 Elizabeth Street, Brisbane Qld 4000

ABN 49 991 006 857 Brisbane Catholic Education

ABN 25 328 758 007 Archdiocesan Development Fund

ABN 35 020 644 975 Centacare

ABN 51 626 296 801 Centacare Administration Services

ABN 24 547 377 893 Xavier Children's Support Network

ABN 88 630 274 434 Romero Centre



Modern Slavery Act 2018 (Cth) – Statement Annexure

Principal Governing Body Approval

This modern slavery statement was approved by the principal governing body of the Corporation of the Trustees of the Roman Catholic Archdiocese of Brisbane as defined by the Modern Slavery Act 2018 (Cth) ("the Act") on 1 June 2026.

This modern slavery statement is signed by the Sole Trustee ('responsible member') of the Corporation of the Trustees of the Roman Catholic Archdiocese of Brisbane as defined by the Act.

A handwritten signature in black ink that reads "Shane Mackinlay". The signature is written in a cursive, flowing style.

Most Rev. Shane Mackinlay
Archbishop of Brisbane





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Pope Leo XIV releases a message to mark the 12th World Day against Human Trafficking, and pledges the Catholic Church's commitment to confront and bring an end to this "Urgent call to confront and bring an end to this grave crime against humanity."

"Within this broken paradigm, women and children are the most impacted by this heinous trade."

"Ultimately, the violence of human trafficking can be overcome only through a renewed vision that beholds every individual as a beloved child of God."

<https://www.vaticannews.va/en/pope/news/2026-02/pope-leo-xiv-world-day-against-human-trafficking-message.html>



A message from the Archbishop of Brisbane, Shane Mackinlay

Our Christian tradition begins with the conviction that every person is created in the image and likeness of God and is therefore endowed with a dignity that can never be taken away. That dignity does not depend on what a person owns, achieves or contributes. It is given by God and must be honoured in every aspect of our life together. This conviction lies at the heart of the mission of the Archdiocese of Brisbane and shapes our response to modern slavery in all its forms.

Pope Leo XIV has renewed the Church's urgent call to confront human trafficking and to bring an end to what he has described as a grave crime against humanity. His words remind us that exploitation takes hold wherever people are treated as a means to an end rather than as persons of inherent worth. Our commitment to addressing modern slavery is therefore an expression both of our faith and of our responsibility to ensure that dignity is upheld in the ways we operate, procure and engage with others.

Within the Archdiocese of Brisbane, we stand against the scourge of modern slavery and will continue to do so until it is eradicated in all its forms.

During 2025, we deepened understanding across our organisation of what modern slavery is and of the part each person can play in preventing exploitation and promoting ethical practice, with staff completing more than double the amount of training than 2024. This growth in awareness is an important part of building a culture in which respect for human dignity is both affirmed in principle and reflected in action.

We have also continued to mature our operational approach to identify, address and eliminate modern slavery risks within our operations and supply chains. This has included the introduction of more rigorous risk management processes and use of an expert third-party supplier that specialises in data, insights and professional services that empower supply chain sustainability. These measures build on the foundations already established and reflect our commitment to ensuring our systems remain responsive, accountable and effective as procurement environments and supply chains continue to evolve.

This work requires vigilance, perseverance and a readiness to keep learning. We are committed to ongoing continuous improvement, recognising that the pursuit of just, fair and ethical practice is not static, but must continue to develop over time. In that spirit, we renew our commitment to doing all we can to ensure that exploitation has no place in the goods and services on which we rely.

With the intercession of St Josephine Bakhita, patron saint for victims of human trafficking, may God strengthen us in this task and guide us in upholding the dignity and freedom of every person.

Yours sincerely in Christ,

Most Reverend Shane Mackinlay
Archbishop of Brisbane

Reporting Criteria 1 and 2: The Roman Catholic Archdiocese of Brisbane

About us

The Roman Catholic Archdiocese of Brisbane (the Archdiocese) comprises parishes and agencies across South East Queensland. Our footprint covers 77,000 square kilometres from the Queensland/New South Wales border, north to Gin Gin and west to Eidsvold and Gatton. We have offices situated throughout the Archdiocese with central administration based in Brisbane. Together we provide:



235 MASS
CENTRES
SERVING
OVER **684,000**
CATHOLICS



146 SCHOOLS
EDUCATING
OVER **78,015**
STUDENTS
EACH YEAR

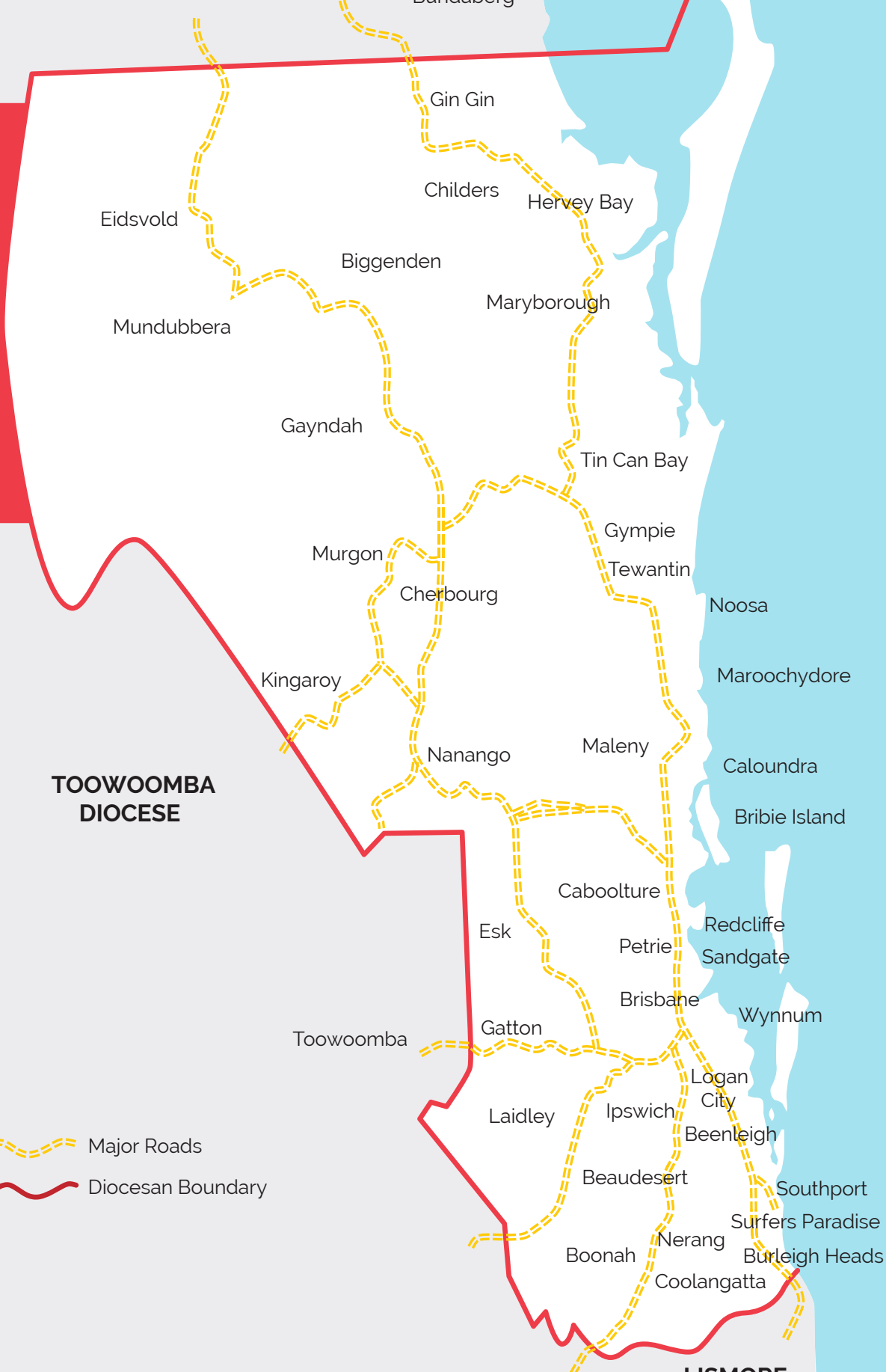


185
CENTACARE
SITES
SUPPORTING
OVER **73,000**
PEOPLE EVERY
YEAR



40 OFFICES
EMPLOYING
OVER **14,000**
PEOPLE

ROCKHAMPTON DIOCESE



TOOWOOMBA DIOCESE

LISMORE DIOCESE

NEW SOUTH WALES

- Major Roads
- Diocesan Boundary

The Archdiocese is led by Archbishop Shane Mackinlay following his appointment by Pope Leo XIV and installation in September 2025 and Vicar General Fr Peter Dillon. Archbishop Mackinlay has committed the Archdiocese to support Pope Leo's calls for a path toward a renewed humanity and says, "Ultimately, the violence of human trafficking can be overcome only through a renewed vision that beholds every individual as a beloved child of God,"

The Archdiocese's vision statement is, 'On a journey led by the Spirit.' There are four dimensions to this vision:

1. We are on a journey of faith into the future
2. We do not see the way ahead clearly
3. The Holy Spirit leads us on the way
4. Together we discern what paths the Spirit is opening before us.

Our Charter

Emeritus Archbishop Mark Coleridge took to heart the 2013 Papal Exhortation *Evangelii Gaudium* (The Joy of the Gospel) and adopted it as the charter for the Archdiocese. Like the universal church, the Archdiocese of Brisbane is in communion with the Bishop of Rome.

We are Catholics who:

- Embrace the person and vision of Jesus
- Build communion with God and others
- Engage in Christ's Mission in our world

These three dimensions are integral to our life as Church and remind us that our faith is anchored in Jesus Christ, who draws us into communion with God and one another and sends us forth in mission to live, share and proclaim the good news of the Gospel in our everyday lives.

Further to this foundational framework which arose out of an Archdiocesan Synod in 2003, and as we seek to plan the kind of future that Christ wants, we note the words of Pope Leo XIV on the Parish:

"We will leverage the strength, flexibility and resilience of our parishes and the faithful to stand against the unrighteous acts of modern slavery in society."

2025 modern slavery risk management initiatives

The key modern slavery risk identified by the Archdiocese is the potential for Tier 1 suppliers to be non-compliant with Australian workplace laws, particularly in relation to health and safety, excessive work hours, unpaid work, below-minimum wages, forced labour and restrictions on freedom of association.

1. The Archdiocese completed further analysis of the supply chain, including analysis through Sedex which commenced in October 2023 and remains ongoing.
2. Brisbane Catholic Education's (BCE's) Procurement has continued to apply and refine processes, tools and templates to enhance due diligence checks and the identification and management of modern slavery risks within our supply chain.
3. Throughout 2025 BCE have continued to develop category plans for its core categories. This approach has been adopted and rolled out across the Archdiocese.
4. The results of the cleaning sector trial enabled BCE to significantly strengthen due diligence during cleaning tenders, with these improvements subsequently extended to uniforms, office supplies, ICT, and furniture. In 2025, BCE:
 - Further adopted elements of the Cleaning Accountability Framework (CAF), including labour-standards and risk-mitigation principles. These include award-rate pay requirements, preference for direct employment models, pricing transparency, subcontracting oversight, and enhanced modern slavery due diligence.
 - BCE has released and updated a Cleaning Toolkit that provides schools with practical tools, templates, and checklists to support robust due diligence in cleaning procurements. The Toolkit is regularly reviewed to address emerging risks, support compliance with award rates, and strengthen controls against modern slavery and labour exploitation. In parallel, BCE has commenced a transition toward a more centrally managed approach

to cleaning services, including the development of standardised contracts incorporating modern slavery clauses and strengthened compliance requirements. These initiatives are being progressively implemented to improve oversight and ethical standards across the category.

- Building on this foundation, BCE will continue to mature its approach to cleaning services by further progressing toward a centrally managed supplier model, strengthening contract-level assurance, and enhancing ongoing supplier due diligence. Future work will focus on improving system-wide consistency, strengthening oversight of labour-standards compliance, and proportionately aligning practices with recognised frameworks such as the CAF. These actions are being implemented in stages and form part of BCE's continuous improvement approach to ethical procurement.

5. In late 2023, BCE in collaboration with the Archdiocese of Brisbane formed the Modern Slavery and Laudato Si' Reference Group that:

- Inform and advise the Archdiocese on modern slavery related issues and BCE's role in managing and mitigating modern slavery risks.
- Provide strategic direction, motivation, empowerment and leadership to ensure that every parish, school and agency of the Archdiocese understands the call to ecological conversion enunciated in Laudato Si' and responds wholeheartedly to transform their personal and institutional operations and practices to develop an integral ecology profile.
- Through the integration of Modern Slavery and Laudato Si' priorities, progress has been made in transitioning the Archdiocesan fleet from petrol vehicles to hybrid and electric vehicles. This transition commenced in 2024 and is expected to be completed by 2028 across the Archdiocese and its agencies.



Our plans for 2026 and beyond

To further our commitment to eliminating modern slavery in our supply chains and to meet our legislative requirements, the Archdiocese has significant plans for the coming years. Following the Archdiocese's Modern Slavery maturity improvements in 2025, the Archdiocese will be focusing our action plan on two key pillars, worker engagement and operations and two sub pillars, being the effectiveness of our actions and maturing our risk management.

These are summarised below and will be discussed in more detail within this Statement.

1. Expand modern slavery training utilising the updated modules developed by ACAN.
2. Conduct modern slavery seminar/presentation from victims of modern slavery.
3. The Archdiocese in collaboration with BCE will commence a review of its procurement practices in 2025-26 with the view of leveraging off the procurement practices established by BCE.
4. The Archdiocese will establish metrics across the following categories:
 - a. Building and construction
 - b. Facility management and property maintenance
 - c. Furniture and office supplies
 - d. Cleaning and security
 - e. Labour hireInitial assessments will continue to be based on BCE's review of vendors in the above categories with an annual spend greater than \$500k and the Archdiocese's review of vendors with an annual spend greater than \$100k.
5. Establish and progressively refine key risk indicators (KRI's) across our supply chain when undertaking risk assessments of vendors which can be adapted to changing business circumstances and conditions.

6. Continue the detailed review of the goods and services provided by approximately 1,000 vendors within our supply chain which will cover approximately 80 percent of our annual spend. This will also ensure accuracy in mapping vendors to the expanded ACAN taxonomy.
7. The Supplier Onboarding Project is in its final design and build stages, delivering a technical solution to capture supplier compliance with BCE's mandatory criteria, including modern slavery requirements. This will strengthen controls over supplier engagement and enable transparent reporting. BCE plans to work with existing suppliers to complete verification in the second half of 2026, with new suppliers required to verify in the Sedex solution from that date. The project also includes establishing a clear offboarding process where appropriate for suppliers that do not meet BCE's mandatory requirements, ensuring BCE only partners with suppliers that meet its obligations and standards.

Our organisational structure

The Corporation of the Trustees of the Roman Catholic Archdiocese of Brisbane is an incorporated entity in the State of Queensland established on 25 July 1935.

The agencies of the Archdiocese include (refer Figure 1):

- The Archdiocesan Development Fund
- Brisbane Catholic Education
- Centacare, incorporating Centacare Community Services, Centacare Specialist Family Support Services, Pastoral Ministries, Catholic Early EdCare and Xavier Children's Support Network
- Archdiocesan Services
- Archdiocesan Ministries.

The support offices of the Archdiocese include:

- The Episcopal Office and Clergy Support
- The Financial Administrator's Office.



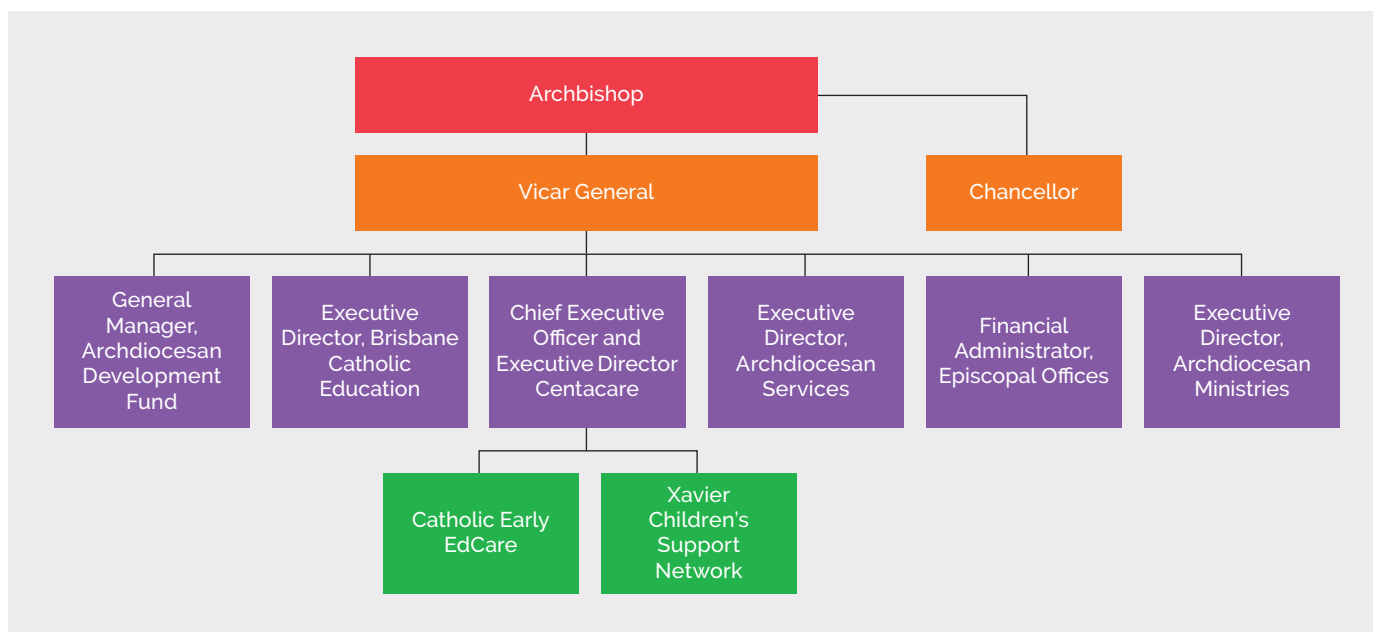


Figure 1: Archdiocese of Brisbane organisation structure

Our governance framework

The Corporation of the Trustees of the Roman Catholic Archdiocese of Brisbane is the legal entity for all parishes and agencies of the Archdiocese. The Archbishop of Brisbane is the Ordinary for the Archdiocese and has canonical authority for the operation of each of the parishes, agencies, schools and services of the Archdiocese.

The Archbishop is at the head of the governance structure (refer Figures 1 & 2). To assist in his role as Trustee, the Archbishop delegates certain responsibilities to the Vicar General, Executive Directors/General Manager of the agencies outlined below. The Executive Directors/General Managers' roles are to ensure that the civil law responsibilities associated with financial accountability, legislative compliance, risk management and people management are met.

The Archbishop, Vicar General, the Executive Directors/General Manager and the Financial Administrator form the Executive Forum. The Executive Forum meets regularly and has responsibility for all matters of operational significance, including modern slavery.

Following the successful implementation of the delegation's framework in late 2022, the

framework was implemented across the agencies of the Archdiocese and underwent some minor adjustments and clarity of definitions in 2023. This framework will be reviewed in 2026-27.

There were a number of structural changes across the Archdiocese during 2025, with the key changes being:

- Retirement of Archbishop Emeritus Mark Coleridge (September 2025)
- Installation of Archbishop Shane Mackinlay (September 2025)
- Liturgy Brisbane moved under Archdiocesan Ministries
- Appointment of new Chief Executive Officer and Executive Director Centacare
- Centacare withdrew from the National Disability Insurance Scheme (NDIS) in November 2025
- Archdiocesan Council renamed as Archdiocesan Finance Council (AFC)
- Archdiocesan Ministries and Services Council (AM&SC) renamed Archdiocesan Services Council (ASC)
- Archdiocesan Ministries Council (AMC) established.

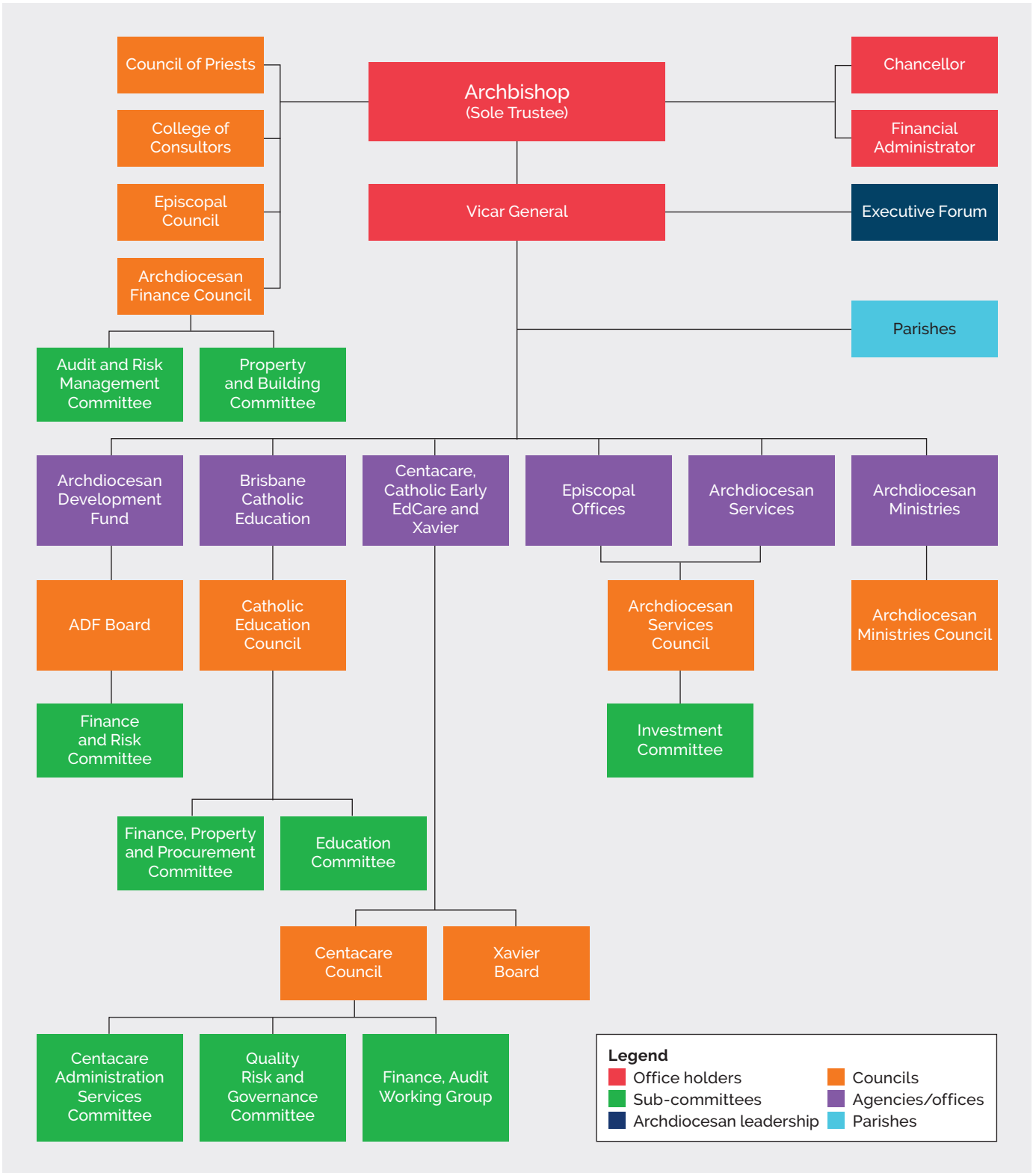


Figure 2: Archdiocese of Brisbane governance framework

Our operations

The Archdiocese contributes to the wellbeing of many communities across south-east Queensland through a diverse range of services and initiatives.

While many people primarily associate the Archdiocese with priests, churches and parish communities, we also live out our faith and mission through important work in areas of education and social services, being present to walk alongside people at critical moments in their lives.

To do this, the Archdiocese employs more than 14,000 Queenslanders. The activities undertaken by our entities are outlined below.

Parishes of the Archdiocese

Our 93 parishes support the religious and spiritual needs of their communities through masses, baptisms, weddings, funerals and other sacraments. They also provide a range of practical supports to members of their communities who are in need.

The Archdiocesan Development Fund

Since 1969, the ADF, as an Agency of the Archdiocese of Brisbane has been financing and fuelling the mission of the Catholic Church.

The ADF is exclusively focused on Catholic entities and have developed a unique understanding of the needs of their customers and stakeholders. This deep understanding allows the ADF to build strong, long-lasting relationships and deliver effective and efficient solutions to meet these needs now and into the future. Structured around a team of experienced relationship managers and operational staff who are freely available to discuss individual customer needs, the ADF ensures each of their customers has a solution tailored to their unique needs.

The ADF is committed to professionalism, confidentiality, security and attention to detail. Supported by experienced vendors such as the Commonwealth Bank of Australia, their clients can operate with peace of mind.

Centacare – including Centacare Administration Services, Catholic Early EdCare and Xavier Children's Network

The Centacare team share a commitment to doing whatever they can to ensure that everyone in their communities is not just cared for, but cared about, in ways that help them live their fullest lives. Across aged care, community and pastoral care, disability care, childcare and family and relationship care, Centacare teams walk alongside people on life's journey, providing the support they need to achieve what is important to them at that moment and into the future.

Since its establishment in the 1950s Centacare's leadership has always been guided by the organisation's Catholic faith. The traditions early leaders established and their faith, continue to guide those working in Centacare today. Referencing the Catholic Social Teachings is one important way people in Centacare continue to understand how our Catholic faith guides our work in communities across South-East Queensland.

Centacare provides early education and care services through Catholic Early EdCare and high intensity support for children with disability through Xavier Children's Support Network. Teams from all across Centacare often come together to provide the holistic support an individual or family needs to thrive. You can see Centacare's full organisation chart in Appendix B. A number of Archdiocesan Services support Centacare's mission.

Brisbane Catholic Education

In the Archdiocese, the Archbishop has responsibility for Catholic education. The Archbishop has delegated authority for the delivery of services, programs and resources in Catholic schools to the Executive Director of Brisbane Catholic Education. The Archbishop and the Executive Director are supported by the Catholic Education Council, the members of which are appointed by the Archbishop. Figure 2 describes this relationship as part of the Archdiocese of Brisbane's governance framework.

Brisbane Catholic Education is a learning community, which includes Archdiocesan and Parish schools and the staff of the Brisbane Catholic Education Office. With 146 schools (refer figure 3), Brisbane Catholic Education provides quality teaching and learning outcomes for Prep to Year 12 students.

Brisbane Catholic Education schools are shaping lives, nurturing individuals and encouraging each student to realise their full potential. Through partnerships with parents, governments and the community, Brisbane Catholic Education schools provide social responsibility, self-discipline and Christian values for all students, and nurture and support the community in their faith journey.

In compliance with the Australian Education Act, Brisbane Catholic Education receives funding from the Federal and State Governments to provide these quality learning outcomes for all students.

You can see the Brisbane Catholic Education's organisation chart in Appendix A.



Figure 3: BCE School logos

Episcopal Office

The Episcopal Office encompasses the offices of the Archbishop and Vicar General as well as the office supporting clergy.

Financial Administrator's Office

The Financial Administrator's Office oversees the financial management and administration of the Archdiocese in accordance with the requirements of Canon Law and the instructions of the Archbishop. In collaboration with the Archbishop, Vicar General and the Archdiocesan Council, the Financial Administrator facilitates the implementation of the Archbishop's financial policies and strategic plans within the Archdiocese whilst ensuring the ongoing financial stability of the Archdiocese.

Archdiocesan Services

Archdiocesan Services provides services and support to parishes and other Archdiocesan agencies in the following areas:

- Finance and Accounting
- Government Relations
- Technology Solutions
- Parish Finance Services
- People and Culture
- Property and Building
- Communication and Engagement
- Workplace Health & Safety
- Governance
- Risk, Assurance and Insurance
- Safeguarding
- Legal
- Archdiocesan Archives
- Nudgee Cemetery and Crematorium

You can see the Archdiocesan Services' organisation chart in Appendix C.

Archdiocesan Ministries (Formerly Evangelisation Brisbane)

The mission of Archdiocesan Ministries is to work with, inspire and empower the Archdiocese of Brisbane to encounter Jesus and live the joy of the Gospel.

Archdiocesan Ministries has a vision to see the Catholic Church become a home for every generation. We envisage a Church that:

- Is a welcoming home for all generations, transcending cultural and societal boundaries to embrace every individual with faith, hope, love and peace.

- Where every person feels safe to come as they are, recognised for their inherent dignity, celebrated in their uniqueness and called into a deep and transformative relationship with God through Christ, guided by the Holy Spirit, and nourished by the sacraments.
- Engages and responds to the diverse voices and experience of others, discerning the movement of the Holy Spirit as we listen.
- That reaches beyond its own walls, working towards healing and reconciliation, especially with First Nations Peoples, caring for creation, advocating for justice and support for the vulnerable.
- Where everyone discovers and lives out their God-given vocation; a Church that looks, sounds, and acts like Jesus.

Archdiocesan Ministries provides services and support to parishes, communities and other Archdiocesan agencies in the following areas:

- Ministry to Children and Families
- Ministry to Youth and Young Adults
- Ministry to Adults
- Strategic Planning and Pastoral Planning
- Ministry of Inclusion through:
 - Multicultural Pastoral Care
 - Refugee Sponsorship
 - Reconciliation with First Nations Peoples
 - Laudato Si' Ecological Spirituality
 - Ecumenical and interfaith dialogue
 - Justice and Peace
 - Liturgy Brisbane
- Vocational Discernment: calling people forward for seminary formation
- Care for Refugees and those seeking asylum through the Romero Centre
- Santa Teresa Spirituality Centre.

Our agencies



ABN 35 020 644 975



744
EMPLOYEES



88
VOLUNTEERS



ABN 24 547 377 893



69
EMPLOYEES
(69 FTEs)



1
VOLUNTEERS



ABN 51 626 296 801



1,597
EMPLOYEES



136
LONG DAY
CARE CENTRES,
KINDERGARTENS
AND OUTSIDE
SCHOOL HOURS
CARE SERVICES

Income

To 30 June 2025, Centacare received income of \$282.4 million of which \$63.9 million was from government funding of aged care and family and relationship services payments. In addition, there was \$199.7 million in fee income from providing community services (NDIS, aged care co-payment and home care services) and childcare. There was other income of \$18.8 million.

\$63.9M in government funding

\$199.7M in fee income

\$18.8M in other income

29,319 children were able to connect, grow and discover at a Catholic Early EdCare long day care centre, kindergarten or outside school hours care service.

6,162 older Queenslanders accessed services to help them to live well in their home and community.

29,793 people affected by domestic and family violence were provided early intervention and crisis response services.

2,135 people with disability accessed services to help them live the life they choose.

5,738 people received home maintenance and modification support to help maintain their independence.

2,940,678 hours of support were provided to older people and people with disability.



ABN 49 991 006 857



11,210
EMPLOYEES
(9,100 FTEs)



6,273
TEACHERS
(5,724 FTEs)



78,015
STUDENTS

146 SCHOOLS

107 PRIMARY SCHOOLS

27 SECONDARY SCHOOLS

12 PREP TO GRADE 12 SCHOOLS

Income

In 2025 Brisbane Catholic Education received an income of \$1,650 million of which \$1,272 million was Government recurrent funding. The main source of this income was Australian and Queensland Government grants for the provision of educational services.

12.1% of students in the Archdiocese attend a Brisbane Catholic Education school

\$1,272M in Australian and Queensland Government grants

59.16% of students identify as Catholic

\$314.6M in school fees and levies

3.65% of students identify as Aboriginal or Torres Strait Islander

\$62.9M in other income

+32 different religious faiths amongst students

Archdiocesan Services Episcopal Offices and Parishes

ABN 25 328 758 007



627
EMPLOYEES



5,040
VOLUNTEERS



93
PARISHES, 17
OF WHICH ARE
RELIGIOUS ORDER
PARISHES



80
PARISH PRIESTS OR
ADMINISTRATORS

Archdiocesan Ministries

ABN 25 328 758 007



59
EMPLOYEES
(35 CASUAL
EMPLOYEES)



52
VOLUNTEERS

Archdiocesan operations

In 2025, Archdiocesan Operations (which includes Archdiocesan Services, Archdiocesan Ministries and the Episcopal Offices) received revenues of \$91.5 million. This was represented by an internal distribution of \$30 million by the ADF, fees, rent and investment income of \$24.1 million, sales of \$6.3 million and other income of \$31.1 million.

The Archdiocese operates within the state of Queensland and has no offices in any other state or country.

203 Number of active Priests in the Archdiocese with faculties

23 Priests in the Overseas Priests Program

18 Retired (Non-active Priests)

684,423 Catholics in the Archdiocese

53,172 attending Sunday Mass per week (measured through Parish census in November 2024 which included other locations)

Providing services across:

- Finance and Accounting
- Government Relations
- Technology Solutions
- People and Culture
- Property and Building
- Communication and Engagement
- Clergy Office
- Workplace Health & Safety
- Governance
- Risk, Assurance and Insurance
- Safeguarding
- Legal
- Archdiocesan Archives
- Nudgee Cemetery and Crematorium

Providing services across:

- Children and families
- Youth and young adults
- Adult formation
- Inclusion
- Communications
- Parish leadership
- Santa Teresa Spirituality Centre
- Vocations Office
- Romero Centre
- Liturgy Brisbane



ABN 25 328 758 007



20

EMPLOYEES



1,024

MEMBERS

Members include archdioceses, parishes, Public Juridic Persons (PJP's) and other Catholic entities and other associates under current ASIC exemptions.

Income

In 2025 the ADF generated \$144.7 million in interest income through the provision of internal church treasury. Loan income of \$72.2 million and investment income of \$72.5 million (net of amortisation).

Our people

The Archdiocese and its agencies uphold clear standards of conduct to ensure a safe and respectful environment. Employees and volunteers who may work directly with children, young people, or vulnerable adults undergo mandatory background checks in accordance with legal requirements.

The Archdiocese's People and Culture department leads the Justice, Equity, Diversity and Inclusion (JEDI) group, which consults regularly with staff on workplace issues related to gender equality, diversity, and inclusion.

Each year, Executive Directors and General Managers certify compliance with Australian employment laws and workplace obligations. Governance councils and external auditors review these certifications to ensure accountability.

Since 2015, the Archdiocese has operated the independent Stopleveline whistleblower service. This platform enables staff, volunteers, and the broader community to report concerns—including those related to modern slavery—in a safe, confidential, and supported manner.

The Archdiocese has only received one modern slavery matter through the Stopleveline service which was investigated thoroughly by our procurement team. The allegations raised were by a third-party (not a victim) and were not substantiated. The supplier concerned assisted the procurement team in providing all necessary information in this matter.

Through these measures, we continue to cultivate a culture that promotes ethical conduct and respect for human rights. This internal commitment directly informs how we manage risk and uphold standards across our supply chain.

Our supply chain

In 2025, Brisbane Catholic Education (BCE) engaged approximately 6,800 suppliers (i.e. with an annual spend greater than \$1,000). While most are Australian-based, a significant portion of products are manufactured overseas, introducing modern slavery risks through global supply chains.

Over the course of the last 4 years, BCE has shifted from a highly decentralised procurement model to a more centralised approach. This involves establishing BCE-wide panel arrangements accessible through the procure-to-pay Buying Platform. Standardised tender toolkits, supported by training and a central procurement helpdesk, are also provided for school-based procurement.

This move supports strategic, category-based procurement, enhances oversight, manages supplier risks, and aligns with our commitments under the Modern Slavery Act, the Reconciliation Action Plan (RAP), and the Laudato Si' Action Plan.

The Archdiocese and its agencies procure a wide range of goods and services, including consumables, information and communication technology (ICT) equipment, motor vehicles, building and construction materials, uniforms, cleaning, and office supplies. While centralisation increases oversight, schools, parishes, and services still retain the independence to engage local suppliers, supporting local economies while requiring appropriate due diligence as risks are identified.

Several procurement categories have been identified as high risk for modern slavery, including ICT, construction, cleaning, security, uniforms, waste management, and office supplies. In 2025, the Archdiocese and BCE continue to encourage high-spend suppliers in these categories to join SEDEX and complete the Self-Assessment Questionnaire (SAQ). There are currently 76 Archdiocesan vendors who have joined SEDEX, with 49 completing the self-assessment questionnaire (SAQ).

In 2025, BCE refined its Cleaning Services and Uniform Procurement Toolkits to streamline tendering and increase the pool of pre-qualified suppliers. These updated toolkits were re-launched and supported by one-on-one training and tailored buying guides. The procurement helpdesk played a key role in building capability and supporting ethical sourcing in school-level purchasing.

In 2025, BCE's restructured Procurement and Contracting function is implementing its strategic roadmap through three core streams: Capability and Governance; Sourcing and Partnering; and

Contracting and Compliance. This structure will continue to mature the procurement function and strengthen the management of modern slavery risks through improved governance, sourcing practices and contract oversight.

BCE has commenced onboarding its top 50 suppliers from high-risk categories to the SEDEX platform to improve supply chain visibility and strengthen due diligence.

Additionally, BCE will launch the Supplier Onboarding Project, which aims to improve ethical sourcing and supplier lifecycle management. A new IT platform that will automate onboarding, reduce duplication, and improve compliance with legal requirements, governance and streamlining supplier approvals.

Currently, contract management at the Archdiocese remains decentralised across Archdiocesan offices, schools, parishes, and service centres, with varying levels of oversight and contract duration. While a fully centralised contract management system is not yet in place, steps are being taken to improve governance and transparency through system-wide initiatives and legal reviews.

Complex high-value contracts, such as those for construction, design, consulting, internet, and electricity, are generally managed by senior agency officers and external law firms. In 2025, the Archdiocese through collaboration with its agencies strengthened their vendor engagement and education (refer to Table 5 page 32). Additional initiatives are being investigated to standardise and improve contract management across the Archdiocese.

The following table summarises the Archdiocese vendor analysis for the 2025 financial year.

	2025 Vendor Analysis				
	No. of Vendors	Vendors Reviewed	% of Total Spend	Max. Spend/ Vendor	Min. Spend/ Vendor
Brisbane Catholic Education	6,800	600	84%	\$37,204,753	\$85,703
Archdiocesan Services	780	163	93%	\$10,765,052	\$30,000
Archdiocesan Development Fund	39	39	100%	\$1,157,839	\$109
Centacare - PBI	1,629	259	90%	\$8,103,697	\$20,047
Centacare Administration Services	1,562	144	86%	\$1,799,257	\$20,130
Xavier Childrens' Support Network	314	37	77%	\$77,675	\$10,302
Parishes (*Spend > \$10,000)	297	297	100%	\$573,256	\$10,000
	11,421	1,539			

Table 1: Archdiocesan entities revenue and vendors

The percentage of the total spend analysis increased from 74% in 2023 to 81% in 2024 and 85% in 2025. Analysis of the Archdiocese's financial data shows the major spend categories are:

- Professional services – 18.7%
- Building and construction – 17.4%
- Facility management, and property maintenance – 9.7%

- ICT hardware – 8.9%
- ICT software and network services – 6.1%
- Finance and investment – 5.7%
- Furniture and office supplies – 5.3%

For a detailed breakdown of each agency's spend by category refer to Appendix D.

Supplier Engagement Overview

Sourcing Countries for Tier 1 Suppliers

Overall inherent risk category: ● High ● Medium

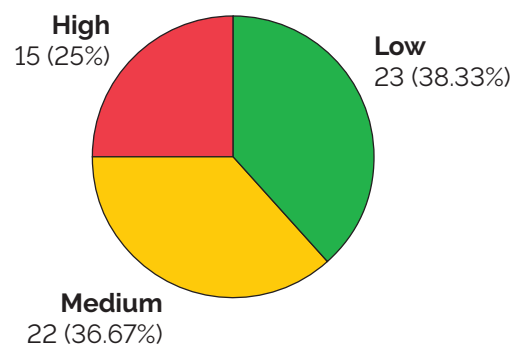


- 1,341** Total Suppliers
- 485** Suppliers in High Risk procurement categories
- 238** ACAN Supplier Surveys completed
 - 91** ACAN Supplier Surveys completed in 2025
- 66** Suppliers identified for Sedex Onboarding
- 658** Supplier Communication
 - 21** Suppliers completing e-learning
 - 10** Audits in 2025
 - 60** Audits Findings in 2025
- 76** Suppliers on Sedex
- 49** SAQs Completed

Supplier Screening – ACAN Collated

- 529** Enhanced 3rd Party Supplier Screening
- 25** 3rd Party Supplier Screening – High and Medium Risk

Sedex SAQ Risk Category



Reporting Criteria 3:

Modern slavery risks in operations and supply chains

Our operations risks

The Archdiocese continued its development of strategies and processes to ensure continuous improvement with its obligations under the Modern Slavery Act 2018 and Pope Leo XIV's call to take action to confront and end human trafficking.

“Urgent call to confront and bring an end to this grave crime against humanity.”

(Source: Vatican News 6 February 2026)

The implementation of a new onboarding process by our People and Culture offices assist the Archdiocese and its agencies recruitment processes to ensure that all employees are engaged in a fair and equitable manner. This has been a key driver in providing us with confidence that the residual risk of modern slavery in our staffing is low. Archdiocesan offices and agencies address human rights issues in our operations under our Codes of Conduct, Equal Opportunity Policies, Inclusion Policies and a suite of other policies and programs.

Other potential human rights issues that could arise in our operations include equality, fair pay, discrimination and safety. While these are not necessarily indicators of modern slavery risk, the Archdiocese acknowledges they are potential labour rights issues which could impact our reputation. To ensure these are identified and reported, the Archdiocese enhanced its Whistleblower Policy and Procedures in 2024, which has seen an increase in reporting across a number of human resource related issues.

The key modern slavery risks associated with the Archdiocese's tier one suppliers related to the following Australian workplace laws:

- health and safety,
- excessive working hours,
- unpaid work,
- below legal minimum wages,
- forced labour,
- child labour, and
- limited or no freedom of association.

Country	Risk	Example of product/service sourced
Australia	Migrant labour exploitation	Cleaning contractors, construction contractors
China	Freedom of association, excessive overtime, forced labour	Electronics, general merchandise, office supplies
Indonesia	Forced labour, bonded labour, migrant labour exploitation	General merchandise
Malaysia	Forced labour, bonded labour, migrant labour exploitation	ICT products, office supplies, electronics, general merchandise
Thailand	Migrant labour exploitation	General merchandise
Vietnam	Excessive overtime	General merchandise, office supplies, electronics

Table 2: Source country risks

There are three factors which, if they exist in our tier one supplier's businesses, can increase the risk of modern slavery where:

- i. Archdiocesan suppliers outsource activities, meaning we do not have a clear line of sight of who is supplying the end product. This also includes where our suppliers use sub-contractors.
- ii. The risk of unfair working conditions when people are employed through third-party labour hire companies for unskilled and semi-skilled labour or where our suppliers utilise sub-contractors to provide cleaning services, construction labour, or groundskeeping services at lower than award levels.
- iii. Countries are associated with increased risks of modern slavery. In table 2 we have identified some of the countries and risks relevant to our supply chain.

Primarily China, Malaysia and Australia are the greatest risks in the Archdiocese's supply chain through migrant labour exploitation. In Australia, this will become a greater risk leading up to the 2032 Olympic Games as labour shortages in the construction industry will lead to the sourcing of labour from overseas jurisdictions. Additional risk mitigation strategies will be implemented to ensure the Archdiocese and its suppliers are not exposed to further risks in this sector.

The offices and agencies of the Archdiocese understand that holding direct relationships with tier one suppliers will assist in managing these risks and will be focusing on developing these relationships further in the coming years with our larger suppliers.

The Archdiocese does acknowledge there may also be heightened risk of modern slavery among tier two suppliers and those further down the supply chain, where our offices and agencies do not have direct relationships and therefore no visibility of employment practices. By subscribing to third-party organisations such as Sedex, we are able to leverage off a network of high value overseas and domestic suppliers, who are required to complete various self-assessment questionnaires and third-party audits as required.

Where a modern slavery risk is identified, further due diligence and this collaboration with the vendor is undertaken to mitigate any ongoing risks and this will be assisted in the expanded use of the Sedex platform in 2024 and this was extended in 2025, with direct requests to vendors with an annual spend greater than \$500k. The Archdiocese seeks to maintain relationships with vendors where possible in order to further educate and raise awareness of modern slavery within our supply chain.

Archdiocese of Brisbane Consolidated Percentage of Vendor Assessed Spend

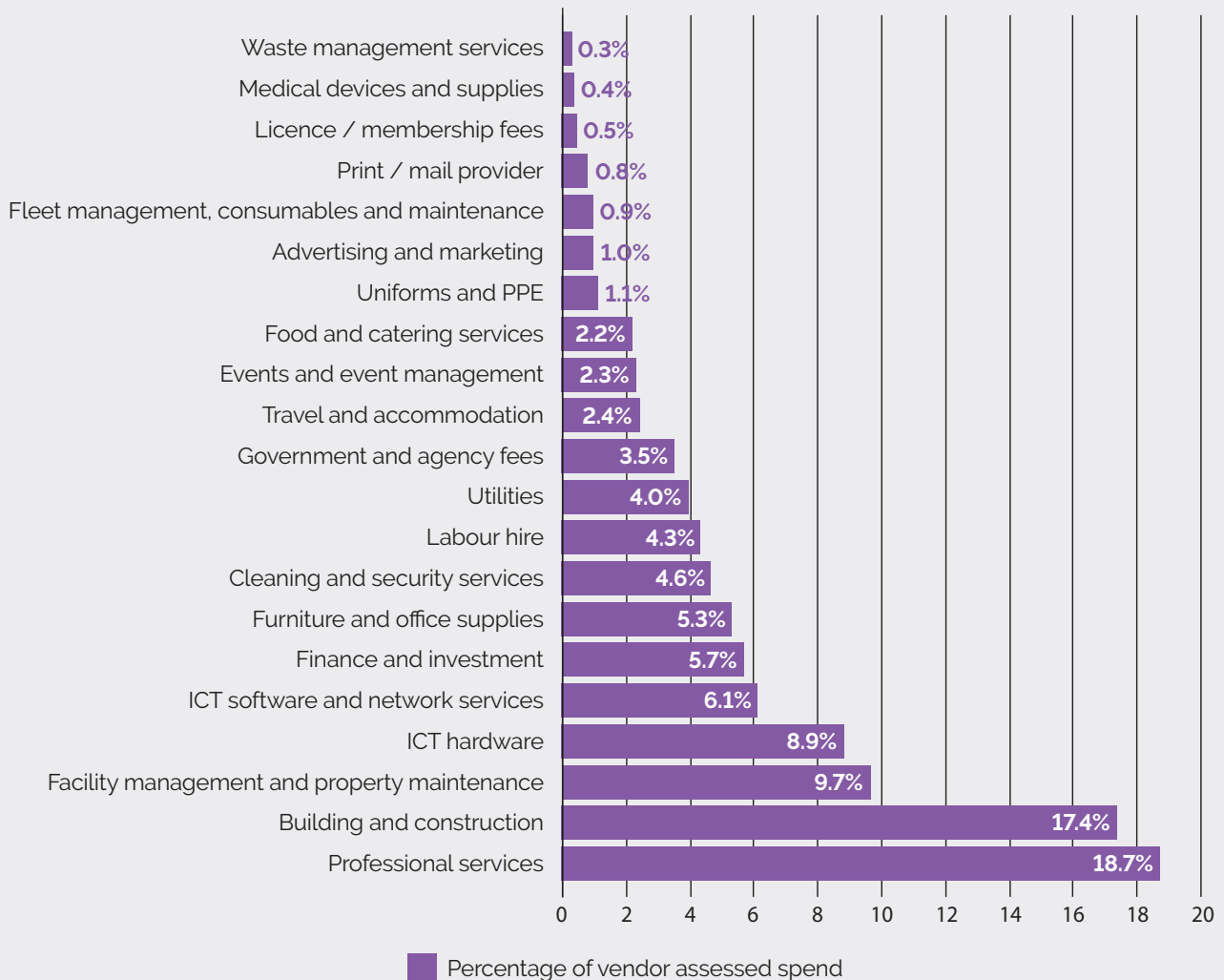


Figure 4: 2025 Consolidated spend profile of the Archdiocese of Brisbane

As we expand our analysis of consolidated Archdiocesan spend, we continue to identify that building and construction, information and communications technology, facilities management, furniture and office supplies, and cleaning and security services remain key risks within the Archdiocese's supply chain. In 2024 there was a marked increase in the overall spend of building and construction and facilities management as more detailed analysis of our vendor network was undertaken. There were additional reporting enhancements implemented across these categories in 2025. Other sectors remained relatively constant.

For a detailed breakdown of each entity's spend by category refer to Appendix F.

Supply chain risks

The areas of risk identified above have been assessed against percentage of annual spend and respective modern slavery potential risk exposure. The category risk taxonomy has been specifically developed for ACAN-based entities based on analysis of participating entity supplier datasets. It includes 12 high level procurement categories identified across various sectors involved in the ACAN network (education, aged care, health care, social services, finance and investment, and Catholic dioceses). The information included in

Table 3 has assisted the Archdiocese of Brisbane to assess potential risk so it can prioritise engagement activities with suppliers. Significant progress has been undertaken in cleaning and security services. In 2025 analysis commenced on the building and construction sector. This will be extended in 2026-27 and will also include a review of the facilities management and property maintenance sector which together account for 28.4% of our consolidated annual expenditure (excluding salaries and wages).

ACAN Category	Count of 2025 High Risk Vendors	Value High Risk Vendors 2025
Building and construction	81	\$87,765,377
ICT hardware	47	\$48,725,776
Facility management and property maintenance	275	\$29,919,488
Finance and investment	29	\$28,631,979
Furniture and office supplies	83	\$26,727,687
Cleaning and security services	92	\$23,440,747
Labour hire	25	\$21,910,785
Food and catering services	40	\$11,180,028
Events and event management	72	\$11,601,489
Uniforms and PPE	21	\$5,509,961
Medical devices and supplies	25	\$1,843,317
Waste management services	5	\$1,486,719
Grand Total	795	\$313,507,717

Table 3: High Risk Vendor Analysis

The Archdiocese has identified 795 vendors across 12 high risk industry sectors for further analysis over the next three years. Our action plan for 2025 has targeted several of these industry sectors for review with the others to be added during the review cycle. These 795 vendors account for more than 62% of the Archdiocese's 2025 annual assessed spend. Where appropriate a number of these vendors were asked to join Sedex to ensure ongoing review/assessment of their modern slavery obligations.

Category	Spend description	Risk	% of expenditure
Building and construction	Building materials (e.g. concrete, steel, timber, plaster products, glass, plastics, quarried stone etc) sub-contracting and labour hire services, demolition, painting and landscaping.	HIGH	17.4
Facilities management and property maintenance	Hard and soft services including minor repairs, plumbing and septic, utilities management, building operations, HVAC, landscaping and yard work, removalists, cleaning and janitorial, security and patrols.	HIGH	9.7
ICT hardware	<p>According to the 2018 Global Slavery Index (GSI), electronics are the highest risk product for modern slavery in supply chains. The report also highlights that the most at-risk electronics imported to Australia are from China and Malaysia.</p> <p>Forms of modern slavery identified by the GSI and other reports as being present in the electronics sector include passport retention or doctoring of identity documents, restriction of freedom of movement, poor living conditions, underpayment, fines and illegal salary deductions, excessive working hours and unpaid overtime.</p> <p>Software and application development, support services, call centres (offshore).</p>	HIGH	8.9
Finance and investment	Investment funds, private equity and hedge funds, banks, financial services providers, insurers, credit and bond rating agencies.	HIGH	5.7

Category	Spend description	Risk	% of expenditure
Furniture and office supplies	General office suppliers, stationery, paper products, small office machines, (not computers or peripherals), labels, ink, toner, furniture (chairs, tables, workstations, filing cabinets, shelves, racks etc), workplace suppliers (cleaning, first aid, bathroom etc), packaging, boxes etc.	HIGH	5.3
Cleaning services	Sub-contracting and labour hire services, chemicals and cleaning products, security equipment (radios, torches, pouches, bags etc) PPE, uniforms and footwear.	HIGH	4.6
Labour hire	Labour hire organisations, specialising in the provision of services to our clients in delivering social services.	HIGH	4.3
Uniforms and PPE	Uniforms (workwear, school wear, sportswear), footwear and PPE (e.g. gloves, face masks or respirators, glasses / goggles, earmuffs, safety workwear etc).	HIGH	1.1
Other	Categories < 3% requiring further analysis.	MEDIUM/ HIGH	10.7
ICT software and network services	Software and application development, support services, call centres (off-shore).	MEDIUM	6.1
Utilities	Electricity (including solar farms), gas, water and wastewater, telecommunications (linked to resources sector risk).	MEDIUM	4.0
Professional services	Other.	LOW	18.7
Government and agency fees	Government expenses and external catholic organisations.	LOW	3.5
			100.0

Table 4: Risk Taxonomy for the Archdiocese of Brisbane

Reporting Criteria 4:

Actions taken to assess and address risk

Throughout the 2025 reporting period, the Archdiocese undertook an extensive review of its decentralised supply chain to better understand and address modern slavery risks across operations. This work highlighted the inherent complexity of a federated procurement environment and reinforced the importance of consistent practices, robust governance, and cross-agency coordination.

Our active membership in the Australian Catholic Anti-Slavery Network (ACAN), including participation in monthly webinars, has continued to provide valuable support and guidance throughout the year. In parallel, the rollout of modern slavery e-learning modules aimed to strengthen staff capability to identify and respond to risks.

In 2025 there has been a renewed focus on leadership coordination and oversight, with senior executives committing to complete the training and encourage uptake among staff with procurement responsibilities.

While 2024 marked a shift toward implementation and capability building, in 2025 there was a need to rebuild the structural requirements of the procurement function, and reflects our strategic commitment to embedding ethical procurement practices across all operations.

Actions taken during reporting period

In 2025, the Archdiocese through collaboration with Brisbane Catholic Education and Centacare improved governance coordination, meaningful supplier engagement through both ACAN and Sedex, and the operationalisation of tools and frameworks developed in prior years.

Governance and Strategic Alignment

1. The Laudato Si' and Modern Slavery Reference Groups now operate as an effective, efficient and a unified governance body between the Archdiocese and BCE, creating a single point of accountability for ethical procurement and sustainability actions.
2. The Archdiocese and BCE Modern Slavery Liaison Officers (MLSOs) have demonstrated strong and effective coordination, supporting a collaborative approach to modern slavery risk management. Through this partnership, and regular engagement with ACAN and its Program Managers and Executives, valuable knowledge sharing has been enabled across Archdiocesan agencies, which continue to benefit from this centralised coordination.

Category Management and Contract Lifecycle Management Reform

1. BCE has expanded its Category Management Framework beyond cleaning and waste management to include uniforms, office supplies, ICT and furniture.
2. In 2025, BCE Procurement was restructured to strengthen capability and governance, centralise sourcing, and enhance compliance and contract management. The new Procurement and Contracting team have developed a strategic roadmap focused on increasing maturity and mitigating modern slavery risk.
3. In 2025, BCE continued to expand centralised contract management, applying standard terms and conditions across a broader range of supplier arrangements, including embedded modern slavery clauses for higher-risk service categories (such as cleaning services). Contract lifecycle events, including the creation, renewal, and replacement of contracts, removed unmanaged renewals and enabled refreshed supplier expectations. Strengthened contract oversight and structured supplier engagement improved transparency and traceability across the supply chain, enhanced supplier accountability, and reduced BCE's exposure to ethical and operational risk. This demonstrates the value of a category-based approach to managing modern slavery risk through effective contract and supplier lifecycle management processes.

Supplier Engagement and Due Diligence

1. BCE has embedded its revised Supplier Code of Conduct. The Code of Conduct reflects BCE's expectations in human rights, labour standards, environmental responsibility and safeguarding and is incorporated in RFQ and onboarding documentation and published on the BCE external website.
2. BCE has strengthened supplier pre-qualification requirements for higher-risk categories. Building on supplier engagement undertaken in previous reporting periods, BCE requires suppliers selected in higher-risk categories – including cleaning, groundskeeping, waste and uniforms to hold and maintain an active SEDEX membership, and to the SEDEX Self-Assessment Questionnaire (SAQ) as part of tender pre-qualification.

3. Following the prioritisation of high risk suppliers with annual spend above \$250,000 in 2024, enhanced due diligence reviews are now embedded as business as usual practice and continue in 2025, with a focus on higher risk procurement categories and informed by internal assessments and guidance from the Australian Catholic Anti Slavery Network (ACAN).

Technology Enablement

1. The Supplier Onboarding Project will deliver a technical solution to strengthen vendor management controls, including centralised supplier creation approval within the Procurement and Contracting Team. The solution enables automated compliance checks and real time reporting, providing BCE with greater transparency of supplier compliance. Delivery of the technical solution is planned to go live at the end of May 2026, with supplier verification to occur in the second half of 2026.
2. Draft RFQ and RFP templates were updated in 2024 to include mandatory modern slavery risk screening questions and were piloted during that year. In 2025, these requirements are being fully embedded as part of BCE's standardised RFQ and RFP templates.

Education and Awareness

1. The Archdiocese and BCE have adopted some of ACAN's e-learning training modules. These are available to employees through the Archdiocese's Arch e-Learns (LMS) and the BCE Learning Management System (LMS).

The training incorporates selected modules developed by the Australian Catholic Anti Slavery Network (ACAN) and includes content on Modern Slavery 101, business relevance, and grievance and remedy mechanisms.

2. BCE expanded mandatory modern slavery training in response to participation levels observed in earlier reporting periods.

Mandatory training was introduced for senior leaders and staff with purchasing responsibilities and is delivered through the LMS as part of BCE's ongoing capability and governance uplift.

Parish and Community Engagement

1. The Parish Toolkit was formally launched across all 93 parishes, accompanied by an internal communications campaign and social media messaging to improve visibility of ethical procurement responsibilities at the local level. The Toolkit will be reviewed and updated in 2026.

Modern slavery action plan and road map

In 2024, BCE launched a three-year Modern Slavery Action Plan (MSAP), aligned with Laudato Si' and ACAN's 2024 program. The MSAP centralises high- risk procurement oversight, embeds risk-based supplier prequalification, and delivers targeted training and engagement initiatives. The MSAP will be reviewed and updated in late 2026.

The Archdiocese continues to build a structured and scalable approach to managing modern slavery risk across its supply chains. Since first engaging with Sedex, one of the world's largest ethical audit platforms, and the Archdiocese has progressively increased its supplier transparency (Refer data in Criteria 5, Table 5)

As part of this evolution, the Archdiocese and BCE established mandatory RFQ and RFP pre-qualification using Sedex's Self-Assessment Questionnaire (SAQ) for suppliers operating in high- risk categories. This initiative proved successful and has continued to be expanded throughout 2025, progressively strengthening upstream risk screening at the point of supplier engagement. In 2024, BCE launched its annual Modern Slavery Action Plan (MSAP), aligned with both the Laudato Si' Action Plan (LSAP) and ACAN's 2024 program of work. The MSAP sets out a clear roadmap for:

- Centralising oversight of high-risk procurement categories,
- Embedding risk-based supplier prequalification, and
- Delivering targeted staff training and supplier engagement activities.

These actions represent a shift from foundational development to full implementation, laying the groundwork for sustained impact, continuous improvement, and measurable outcomes on an ongoing basis.

2025 Case Study: Category-based risk management

In 2025, BCE continued to strengthen modern slavery governance through the operation of the newly established Procurement and Contracting function and a sustained focus on category based contract management. Consistent with this approach, a review of cleaning contracts conducted in December 2025 confirmed that 82% of cleaning arrangements were operating under BCE's standard terms, including embedded modern slavery clauses. This reflects continuous improvement in contract governance and the progressive transition away from legacy supplier terms as contracts are renewed or replaced.

Looking ahead, BCE intends to further mature its approach in 2026 through the establishment of a cleaning services supplier panel, which will support enhanced supplier oversight, more consistent application of modern slavery requirements, and strengthened risk based supplier management.

BCE 2024 Modern Slavery Action Plan (MSAP)

Action category	Actions for implementation	Status
Business and management systems	Establish a 3-year Brisbane Catholic Education Modern Slavery Action Plan (MSAP), that discerns and is connected to the Archdiocese of Brisbane Laudato Si' Action Plan (LSAP) and aligns to the ACAN 2024 program of work.	Established in 2024 and is ongoing.
	The Brisbane Catholic Education Modern Slavery Action Plan (MSAP) and funding commitment approved by the Executive Director.	Established in 2024 and is ongoing.
Risk management	Develop RFQ and RFP templates with strong mandatory pre-qualification criteria, in particular, criteria that reduces modern slavery risk exposure and highlights potential modern slavery within the supplier's supply chain.	RFQ and RFP templates enhanced in 2024 and is now mandated from 2025 for high-risk categories, requiring suppliers to complete self assessment questionnaires (SAQs) and, where relevant, be onboarded into the Sedex platform.
	Establish Sedex as the tool of choice in building modern slavery knowledge, insight and capability, across the Brisbane Catholic Education Modern Slavery Reference Group.	SEDEX is the tool of choice that strengthens early identification of modern slavery risks prior to contract award and execution.

Action category	Actions for implementation	Status
Procurement and supply chain	Establish a supplier on-boarding framework and process that enables the supplier management strategy, driving stronger pre-qualification and compliance for suppliers engaged by Brisbane Catholic Education.	The Supplier Onboarding project is in the final stages of design and development for the technical solution to enable verification. The Project expects suppliers to commence the verification process from June 2026. The scope includes supporting current suppliers to become verified and a procedure for offboarding suppliers that do not meet BCE's minimum criteria. Additionally, the project involves strengthened controls for vendor management and ongoing maturity of managing the vendor lifecycle centrally in Procurement and Contracts.
	Ensure cleaning, uniforms, waste management, print, ICT, and furniture and office supplies contracts which are managed by Brisbane Catholic Education Procurement contain appropriate modern slavery clauses.	BCE has developed bespoke contract templates for high-risk categories to ensure more robust modern slavery clauses are embedded. Following a compound annual growth rate of 60% in contracts under management from 2022 to 2024, BCE has continued to increase strategic oversight of procurement through centralised contract management. BCE continue to update its standard templates to include categories such as Construction (updated 2025) and ICT which will be updated in 2026, with a focus on applying BCE terms and embedding modern slavery clauses.
	Develop a supplier engagement strategy that includes a refreshed Supplier Code of Conduct.	The refreshed Supplier Code of Conduct was published on BCE's external website and systematically embedded into onboarding, tender, and RFQ documentation, especially for high-risk suppliers. Part of the category based approach is a Supplier Engagement Strategy, which commenced in Q4 2024 with BCE's Top 20 suppliers (by spend) and has been expanded in 2025 to include capability building activities, FAQs, and guidance for suppliers in navigating BCE's ethical procurement requirements.
	Ensure all contracts contain appropriate modern slavery clauses.	That said, modern slavery clauses have been included in bespoke contracts such as cleaning, uniforms, canteen) due to their classification as high-risk industries for modern slavery.

Action category	Actions for implementation	Status
Human resources and recruitment	Develop a modern slavery communications strategy.	Commenced early 2024 and is ongoing.
	Implement a phased training program for staff with purchasing (buying and approving) responsibilities.	Commenced Q2 2024 and is ongoing.
	Promote awareness of modern slavery internally. Archdiocesan and BCE intranet platforms, ensuring accessibility and visibility to all staff members.	Continuing for 2026.
Customers and stakeholders	Engage key stakeholders on our modern slavery expectations.	Commenced in 2021 and is ongoing.
	Establishing RFQ / RFP mandatory pre-qualification to require suppliers to have active Sedex memberships, complete the Self-Assessment Questionnaire (SAQ) up to 100% and connect to Brisbane Catholic Education as a supplier on Sedex.	RFQ and RFP templates enhanced in 2024 and mandated from 2025 for high-risk categories, requiring suppliers to have an active SEDEX membership and have completed the self-assessment questionnaires (SAQs) to 100% and, maintain their SEDEX membership for the duration of the contract with BCE.
	Refresh the Archdiocesan and Brisbane Catholic Education Supplier Code of Conduct and communicate with high-risk suppliers via BCE's external website, through RFQ/RFP processes and through on-boarding suppliers to the BCE Buying Platform (especially for catalogue- based suppliers).	The refreshed Supplier Code of Conduct was published on BCE's external website and systematically embedded into onboarding, tender, and RFQ documentation – especially for high-risk suppliers.

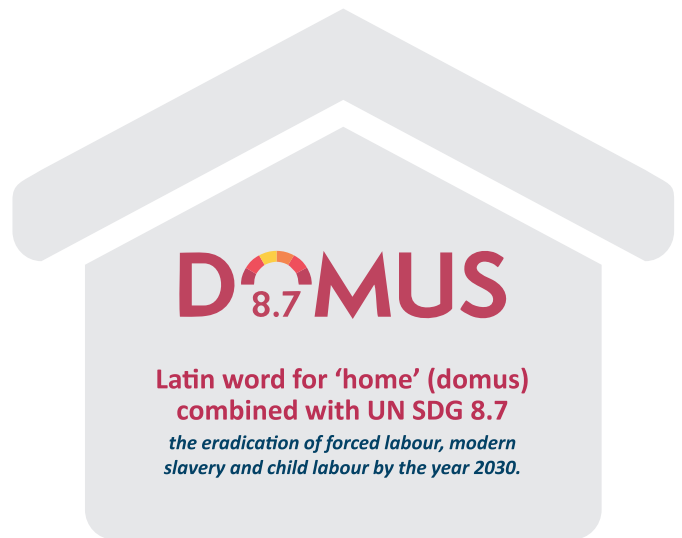
Table 5: BCE's Modern Slavery action plan

Domus 8.7

The Archdiocese of Brisbane is a founding member of Domus 8.7. Domus 8.7 was established as an agency of the Catholic Archdiocese of Sydney in 2020 as a key element of the ACAN Modern Slavery Risk Management Program. This collaborative approach to remediation is aligned with the Modern Slavery Act and Catholic Social Teaching which are centred on the needs, wellbeing and empowerment of people impacted.

Domus 8.7 provides the Archdiocese of Brisbane with:

- resources that enable us to listen to workers (grievance channel)
- a 24/7 careline for workers on our sites, staffed by professional counsellors
- direct support to people impacted by modern slavery
- guidance and technical assistance to prevent, identify and remediate modern slavery
- a documented process to assess if an organisation has caused, contributed or is directly linked to modern slavery and modern slavery indicators



Domus 8.7 empowers people impacted by modern slavery to have choice and control over what forms of remediation are meaningful to them and to engage safely with business/supply chain actors. Supports may include:

- modern slavery indicator assessment
- needs assessment, case coordination, response and remediation planning
- referrals to community, social services, unions
- transport, accommodation, financial and food support
- legal support, referrals, accompaniment and advocacy
- job training, retraining and redeployment
- accompaniment and advocacy to engage with government and law enforcement agencies
- opportunities to contribute lived expertise to improve modern slavery responses.

Why a remedy pathway is needed

A remedy pathway provides several direct and indirect benefits to businesses:

- Enhances modern slavery risk management programs within operations and supply chain
- Provides assessment, support and guidance in relation to modern slavery concerns
- Develops internal capability to manage risk and engage staff
- Establishes a documented pathway to manage (potentially) complex humanitarian issues
- Addresses a key mandatory reporting requirement of the Modern Slavery Act 2018
- Boosts credibility and reputation as a responsible business
- Enhances standing with regulators, shareholders, customers and community groups.

Integrating remedy into systems and processes demonstrates an ongoing commitment to protecting the human rights of people in the operations and supply chains of our operations.

Domus 8.7 is an agency of the Catholic Archdiocese of Sydney. Domus 8.7 staff can help workers, businesses or community members to obtain support, advice and guidance on how to respond to suspected or actual situations of modern slavery.

Contact Domus 8.7 on 02 9307 8464, email info@acan.org.au or send a message to <https://www.acan.org.au>

In cases where there is an immediate threat to life and safety, please dial 000.

Whistleblower hotline

The Archdiocese believes that everyone is entitled to work in an ethical workplace free of harassment, bullying, corruption and illegal activities. The Stopleveline Whistleblower Hotline is provided for any employee, supplier or customer to anonymously report suspected or actual wrongdoing in our organisation, including that related to modern slavery.



Archbishop Mark Coleridge Emeritus presents the Stopleveline and Whistleblower Policy

<https://www.youtube.com/watch?v=W7oXT83XP-s>

Reporting Criteria 5: Effectiveness assessment

In 2024, ACAN shifted away from the Gap Analysis previously reported towards a focus on the maturity of our modern slavery risk management approach. As we present the fifth modern slavery statement, it's essential to recognise the need for a reset to aim for continuous improvement as required under the Modern Slavery Act 2018.

This transition underscores the importance of assessing our approach's maturity to drive the impact against modern slavery. The maturity scorecard is designed to provide a comprehensive view of our efforts across different key areas of operation, presented as pillars.

Continuous improvement

Collaboration is at the heart of accelerating progress. This also includes opportunities to comparatively measure social, environmental and governance (business ethics) risks and actions with peers in our network.

In its foundational stages, the Archdiocese of Brisbane used an internally devised ACAN framework to measure progress. This bespoke approach reflected the unique priorities, constraints, and practices across Catholic organisations.

In 2025, the ACAN Program adopted a globally recognised risk measurement system through SEDEX. This aligns reporting entities with a

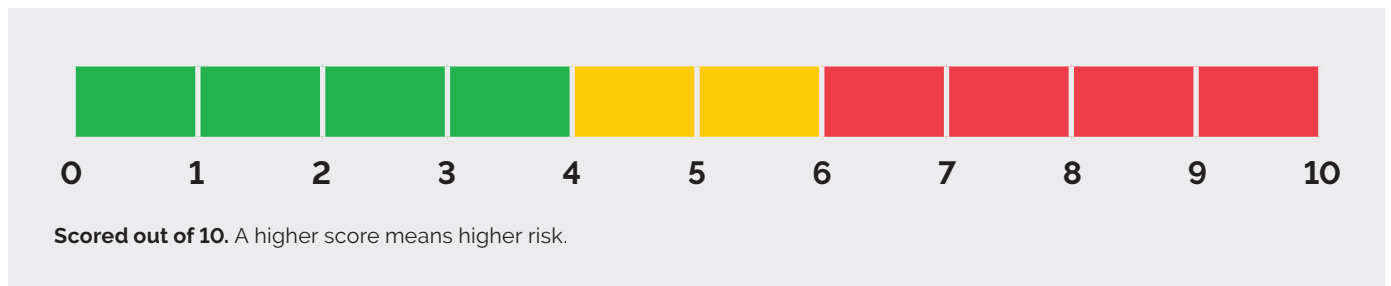
methodology that combines global data about risks in different countries and industries with site-specific information from the SEDEX platform. SEDEX regularly updates the methodology to ensure it is aligned with new and emerging risks. Therefore, completion of the SEDEX SAQ completed by the Archdiocese of Brisbane is a substantial measure of continuous improvement year on year. Below is an explanation of how scoring is calculated using the SEDEX SAQ and the Archdiocese's 2025 risk scores and management controls that will serve as our benchmark for continuous improvement.

Explanation of Scoring

Combined Risk Score 0/10 – calculated from inherent risk and site characteristics, adjusted for management controls and audit results. The score is broken down by pillar and highlights strengths and opportunities to focus our efforts on key areas that drive ethical and sustainable practices.

Inherent Risk Score 0/10 – predicts potential risks based on a country/region, and sector. Spanning all four pillars, this score is broken down by topics. It can be used as a baseline to identify and prioritise areas for improvement in operations. This score shows the natural risks of doing business in a specific country or sector. It does not include any details about individual sites.

Risk scoring scale



Labour Standards Pillar – assesses location and industry factors that could increase labour risks, such as vulnerable worker populations or high rates of workplace violations.

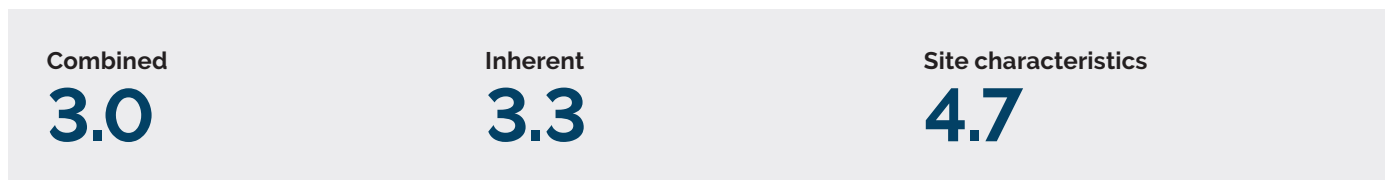
Health and Safety Pillar – considers regional and industry-specific health and safety risks, including local regulations and industry accident rates.

Business Ethics Pillar – assesses industry and location risks related to unethical practices, such as high corruption levels or weak regulatory oversight.

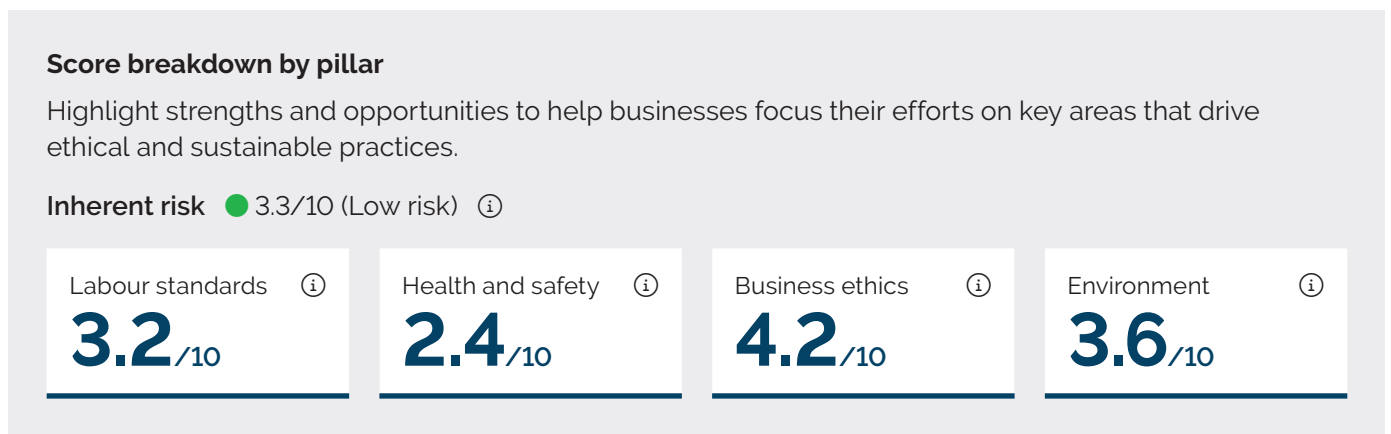
Environment Pillar – examines the environmental impact of the site's industry and location, such as pollution levels or resource use that may create regulatory or compliance risks.

Risk scoring summary

Scores based on the site's basic information, SAQ answers and latest audit.



The Archdiocese of Brisbane received a combined risk score of 3/10 (Low Risk) and an inherent risk rating of 3.3 (Low Risk). The breakdown by pillar of this score.



Site Characteristics Risk Score 0/10

Highlights potential risks based on our suppliers' SAQ responses in the Labour Standards and Health and Safety pillars. This score can be used to assess and support the implementation of policies and processes that mitigate workplace risks within our supply chain

Labour standards – reflects labour-related risks like employment practices, workers rights and wages based on SAQ responses. High-risk activities in this area can raise the score.

Health and Safety – based on SAQ responses to questions about site-specific health and safety factors, such as equipment usage, handling of chemicals or accident risks.

Management Controls Score 0-5

This score measures how well policies or processes are in place to reduce the risks from the site characteristics. It is also based on answers in the SAQ. A Poor score of 0-0.9 indicates that there are few or no controls in place. An advanced score of 4-5 indicates that there are exemplary controls that exceed compliance and drive innovation.

Labour standards – evaluates policies and processes to ensure fair labour standards and worker protections are effectively managed.

Health and Safety – reviews the adequacy of safety protocols, emergency preparedness and training efforts to manage health and safety risks on site.

Business Ethics – evaluates controls against unethical practices such as anti-bribery policies, compliance with legal standards and transparent operations.

Management controls 4.1/5 (Advanced)

Measures suppliers' risk management (0-5, with 5 as best) to assess effectiveness and target improvements.

Labour standards ⓘ

4.2_{/5}

Health and safety ⓘ

3.9_{/5}

Business ethics ⓘ

4.5_{/5}

Site title	Points available	Points achieved	% of points achieved	Management Controls Score
Profile	1	1	100%	5.0 (Advanced)
Management systems	31	30	96.8%	4.9 (Advanced)
Freely chosen employment	15	10	66.7%	3.4 (Good)
Freedom of association	7	6	85.7%	4.3 (Advanced)
Health and Safety	53	44	83%	4.2 (Advanced)
Living accommodation	82	62	75.6%	3.8 (Good)
Working hours	6	6	100%	5.0 (Advanced)
Discrimination	41	34	82.9%	4.2 (Advanced)
Discipline and grievance	28	23	82.1%	4.1 (Advanced)
Communities and human rights	12	7	58.3%	2.9 (Moderate)
Business ethics	10	9	90%	4.5 (Advanced)

Baseline Data template

The ACAN baseline data table provides a comparative measure of supplier engagement and program activities to measure progress and inform future action planning.

Activity	2024 Catholic Archdiocese of Brisbane	2025 Catholic Archdiocese of Brisbane
Hours spent on modern slavery activities	867	830
Individual staff completed e-learning	1,580	1,021
E-learning modules completed	1,245	2,765
Total number of suppliers	11,347	11,421
Number of suppliers with visible contact information and ABN	1,152	1,341
Number of suppliers across high-risk categories	485	498
Number of ACAN Supplier Surveys completed	176	238
Supplier staff attending capacity building webinars	58	21
Supplier Communications	New	658
Suppliers completing e-Learning	New	21
Supplier Audits	New	10
Invited to join Sedex	56	66
Joined Sedex	49	76
Sedex SAQ completed	66	49
Social audits	1	10
Corrective actions	0	0
Enhanced third party Supplier screening	New	529
Contacts made via worker voice / grievance mechanism	71	54
Referrals for advice and assistance	1	0
Individuals identified or referred for modern slavery assessment	0	0
Individuals with modern slavery cases remediated	0	0

Table 5: Baseline Measure of the Archdiocese's Effectiveness Assessment

Areas identified for improvement in 2026 include:

- Operations – Further embedding modern slavery in our procurement processes
- Improving the effectiveness of our actions

Reporting Criteria 6:

Process of consultation with entities owned or controlled

The Modern Slavery and Laudato Si' Reference Group oversees the implementation of BCE's Modern Slavery Action Plan as well as the deliverables under the Laudato Si' Action Plan.

In 2024, the Modern Slavery and Laudato Si' Reference Group coordinated by Brisbane Catholic Education was expanded to include Archdiocesan representation with both the Director Risk and Compliance and the Governance Risk and Compliance Officer (who are both Modern Slavery Liaison Officer's (MSLO's) for the Archdiocese).

Archdiocesan representatives liaise with all agencies and offices in gathering information required in addressing the legislative criteria under the Modern Slavery Act (C'wth) 2018.

The consultation process was expanded through 2025 following significant changes within agencies which is highlighted under Criteria 1 and 2.

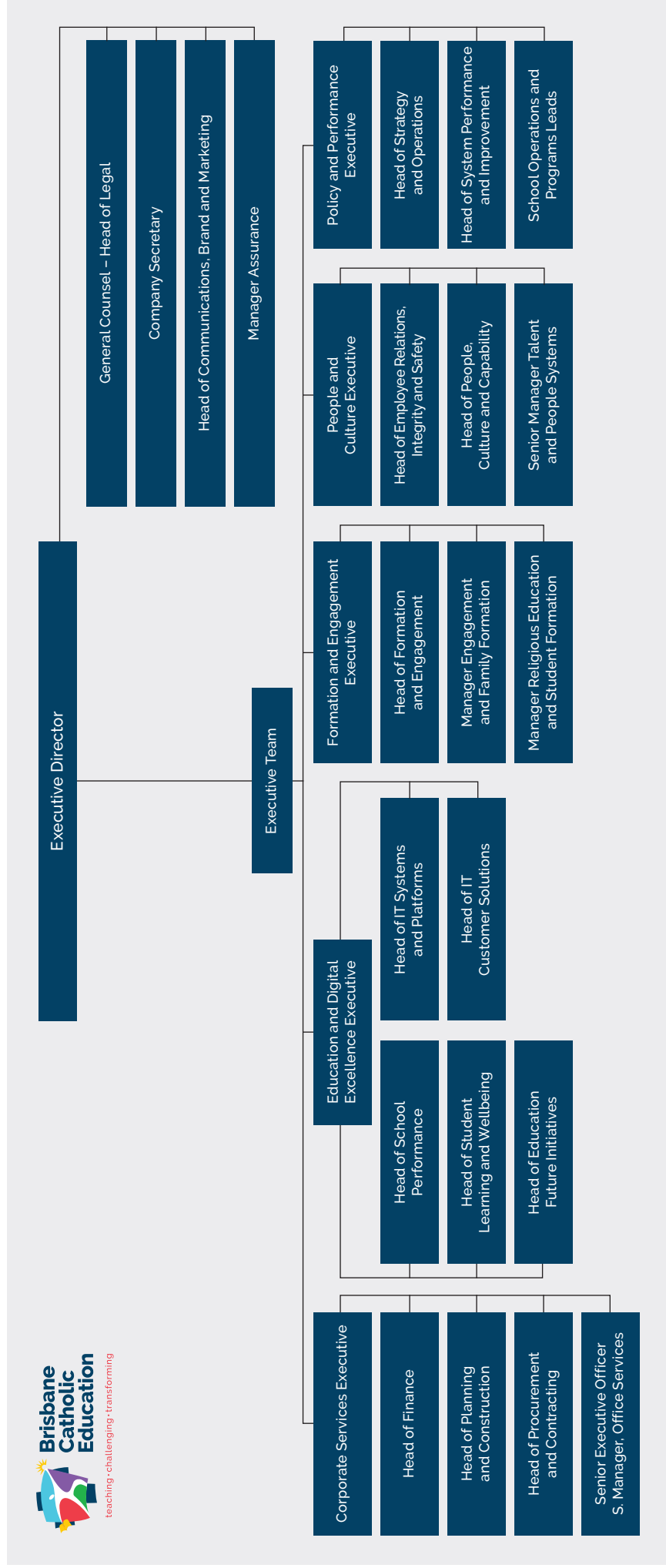
The Archdiocesan Audit and Risk Management Committee maintains oversight of the human rights and modern slavery risks through the Archdiocesan Risk Management Framework.

It is proposed to expand the membership of the Modern Slavery and Laudato Si' Reference Group in 2026 to include representation from Centacare and Catholic Early EdCare. This will enhance the continuous improvement of our Modern Slavery Framework and greater collaboration across Catholic entities.

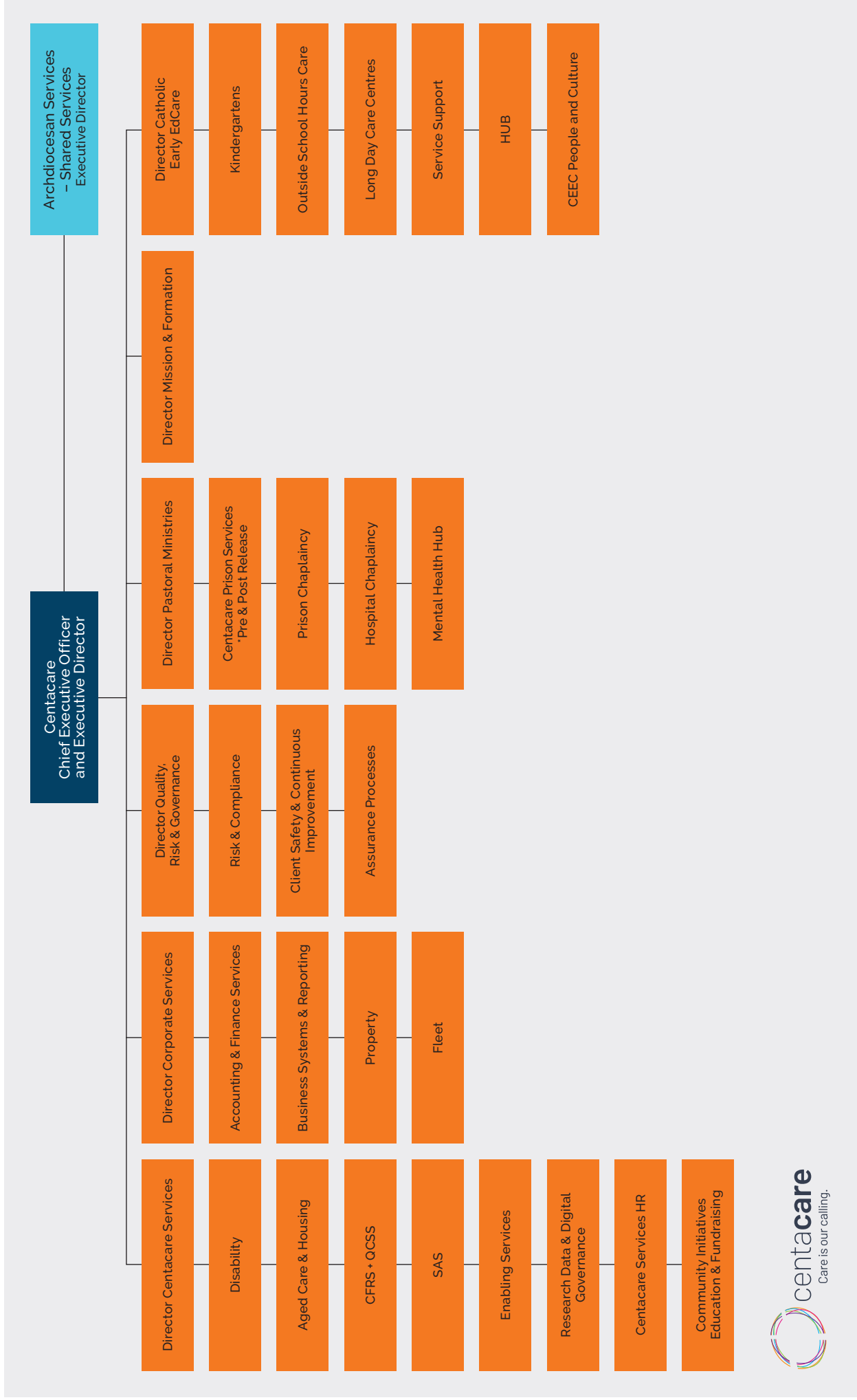
All key stakeholders across the Archdiocese participate in the assessment and approval of the information collated and brought together in approving the Archdiocese's annual Modern Slavery Statement.

Appendices

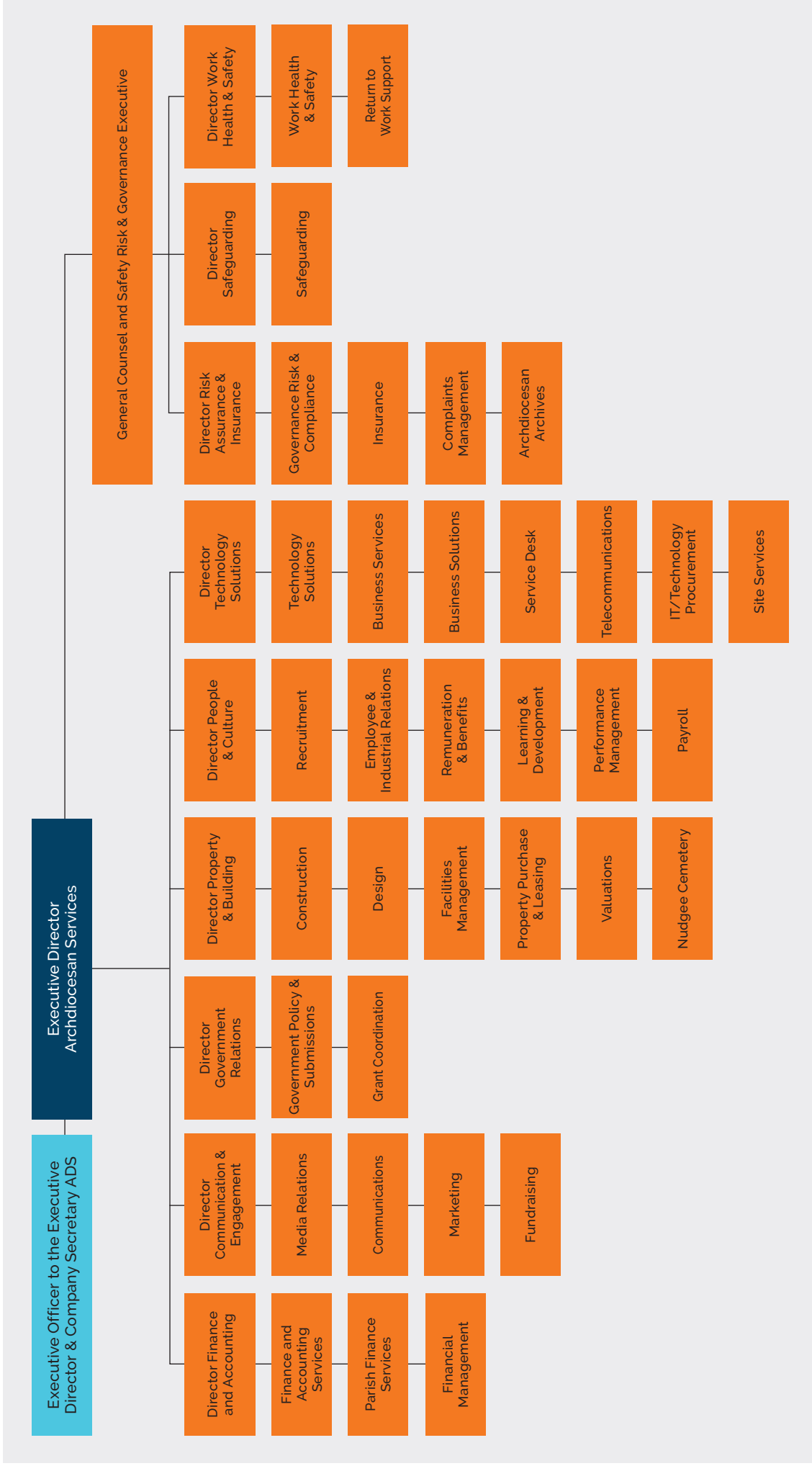
Appendix A: Brisbane Catholic Education organisation chart



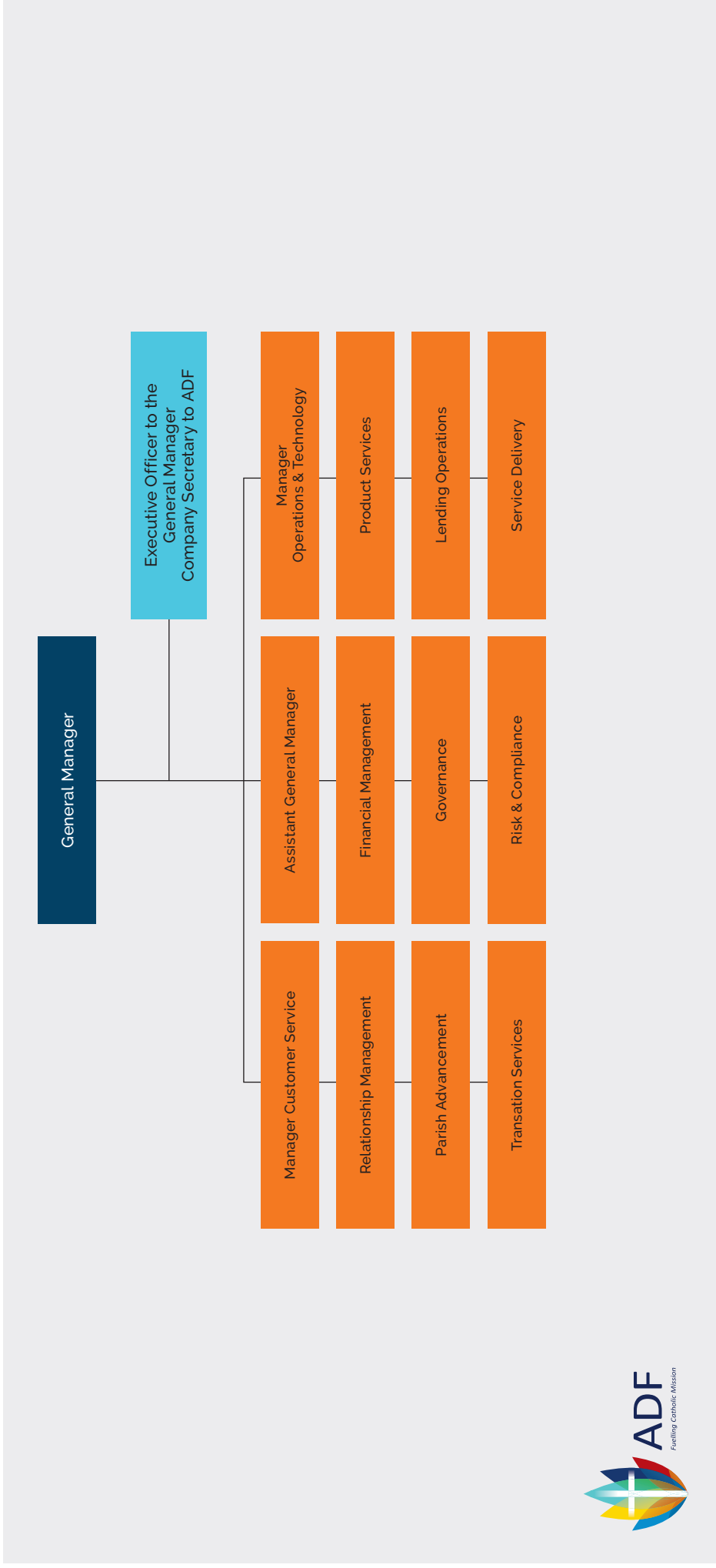
Appendix B: Centacare organisation chart



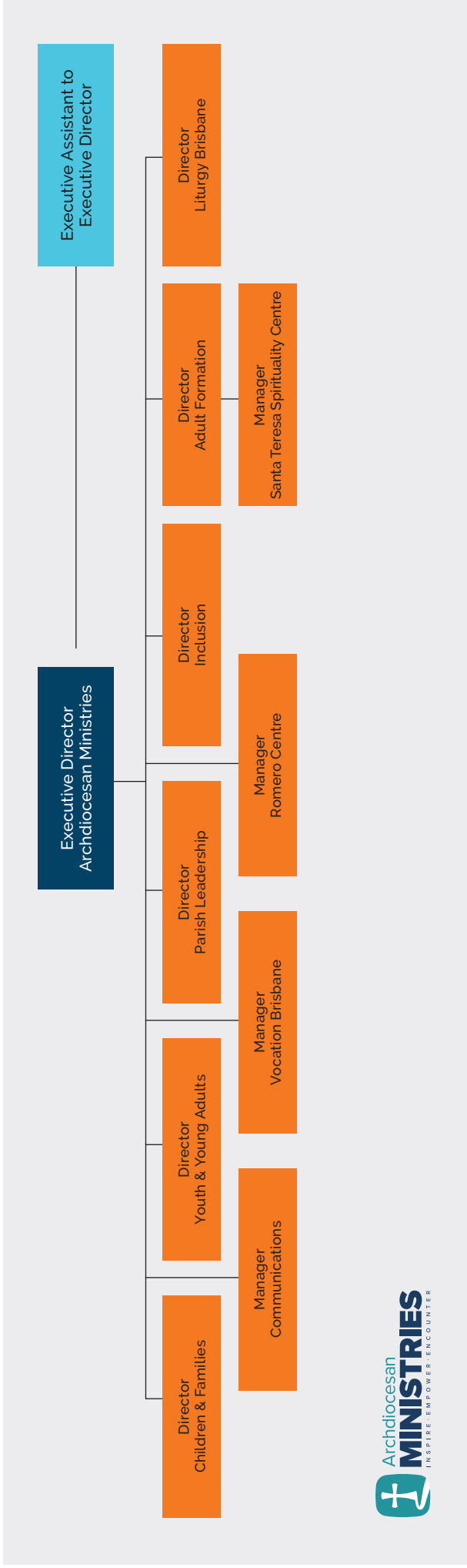
Appendix C: Archdiocesan Services organisation chart



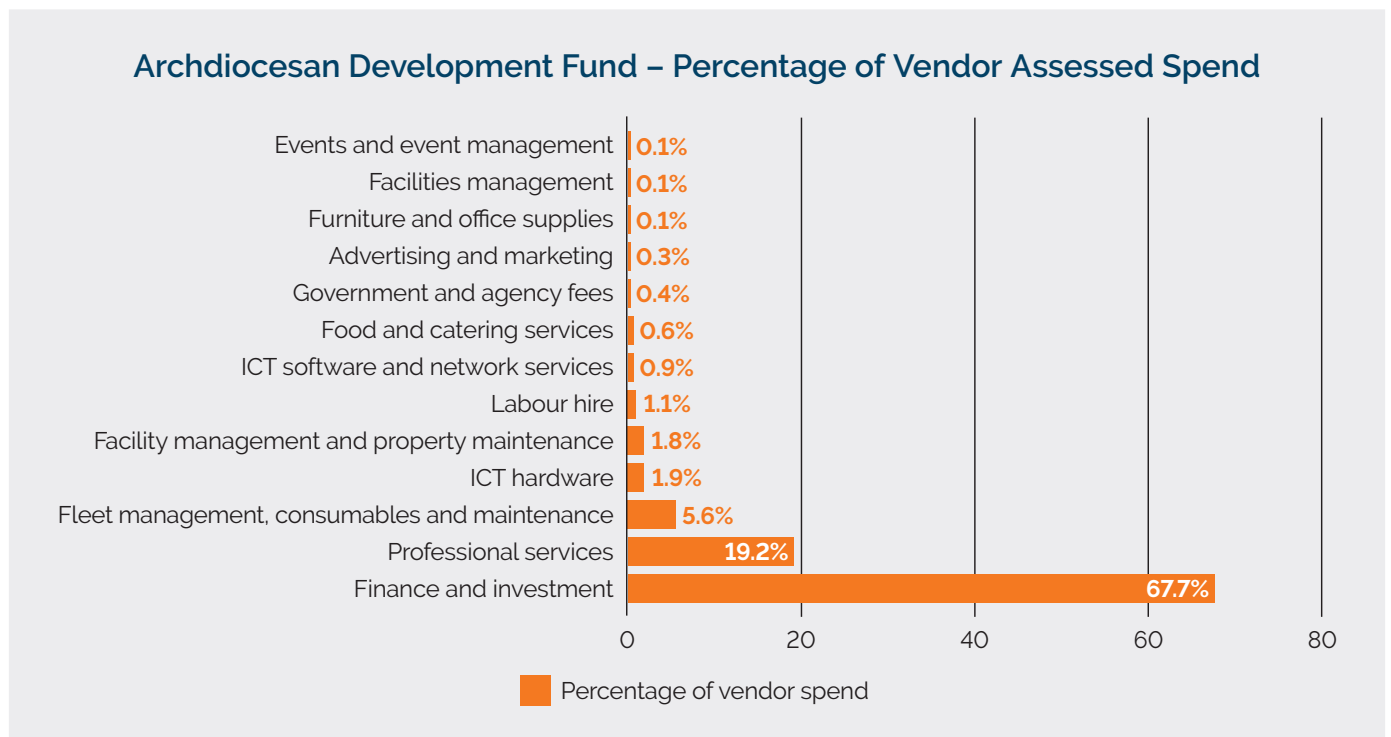
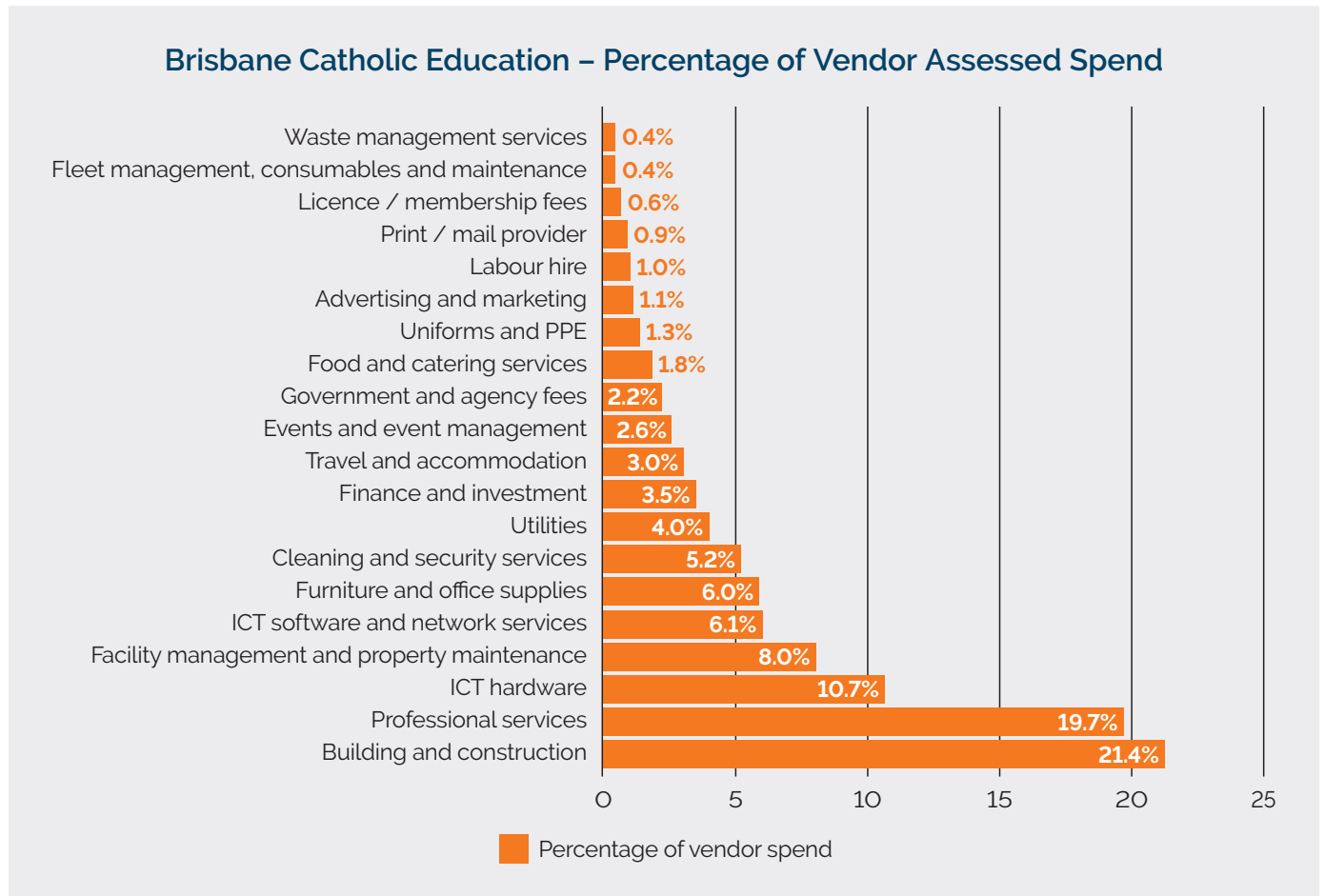
Appendix D: Archdiocesan Development Fund organisation chart



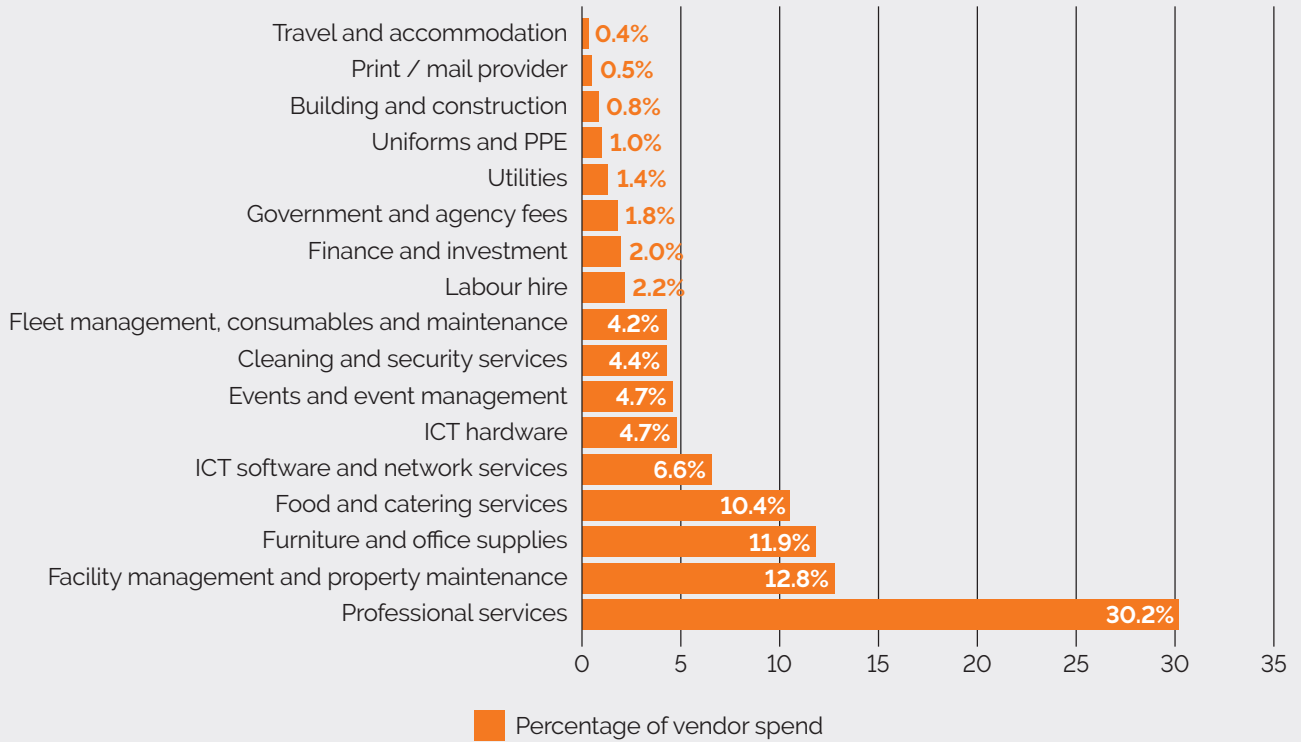
Appendix E: Archdiocesan Ministries organisation chart



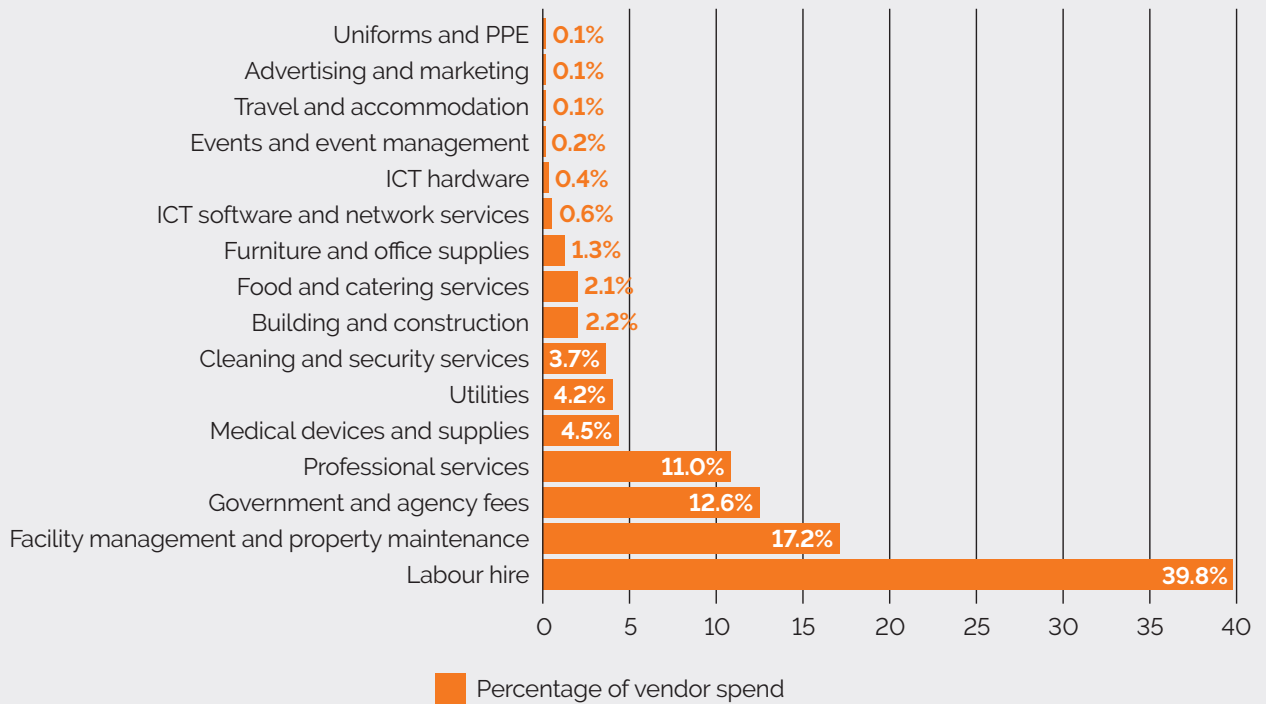
Appendix F: Agency spend by category



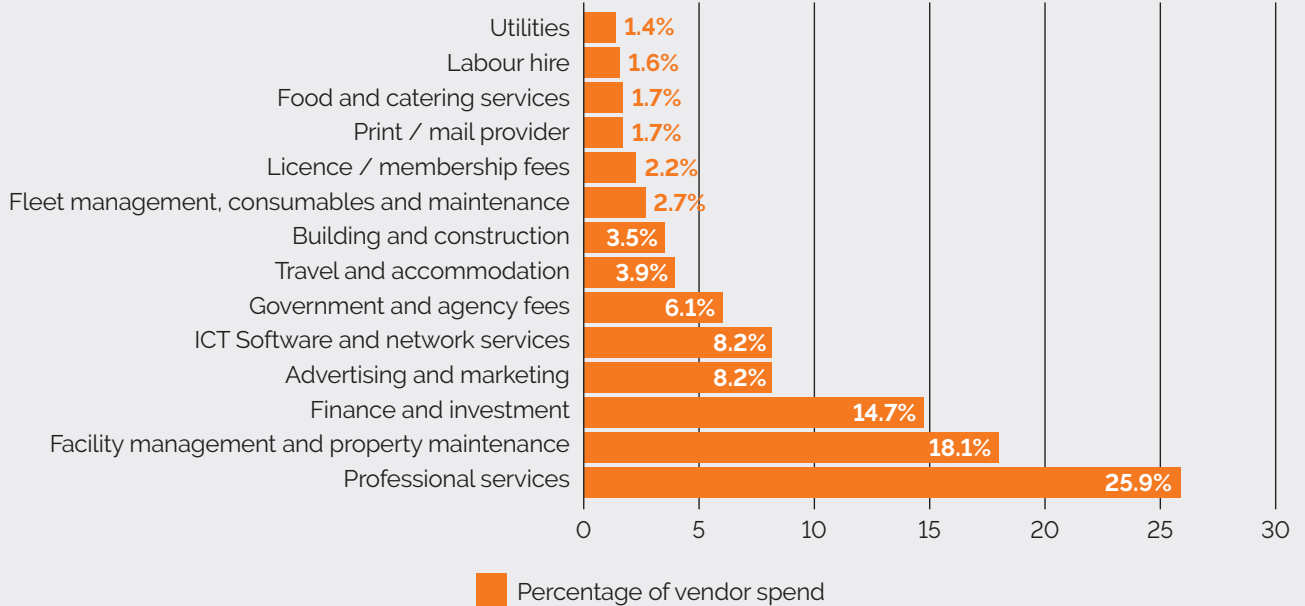
Catholic Early EdCare – Percentage of Vendor Assessed Spend



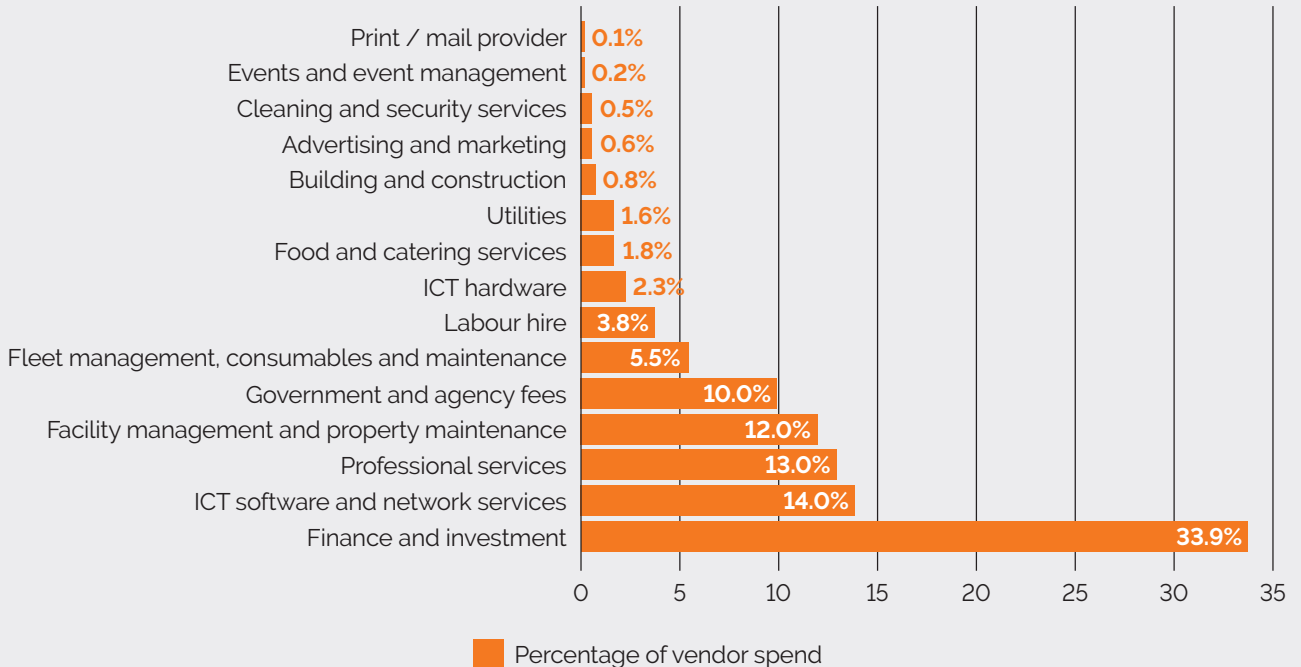
Centacare PBI – Percentage of Vendor Assessed Spend



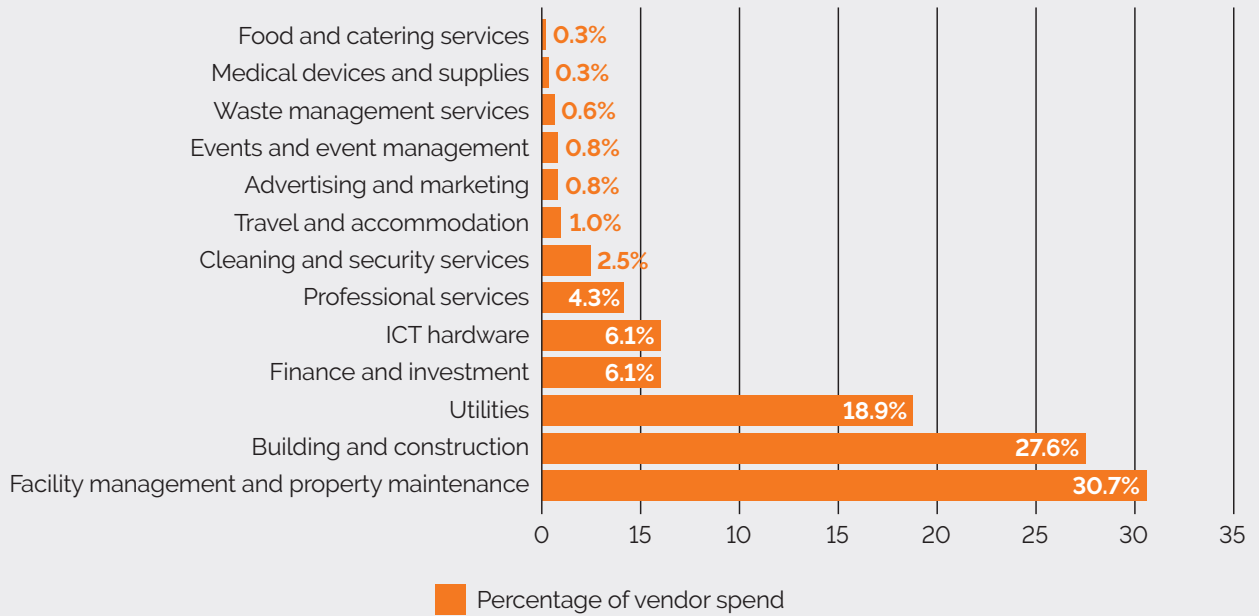
Xavier Children's Support Network – Percentage of Vendor Assessed Spend



Archdiocesan Services – Percentage of Vendor Assessed Spend



Archdiocese of Brisbane Parishes – Percentage of Vendor Assessed Spend





References:

- Catholic Archdiocese of Sydney. (2023). What is modern slavery? Australian Catholic Anti-Slavery Network. Retrieved April 5, 2023, from <https://www.acan.org.au/modernslavery>
- Nolan, J., & Boersma, M. (2019). Addressing modern slavery. University of New South Wales Press.
- The State of Queensland. (2022, April 21). Eliminating modern slavery in government supply chains. Queensland Government. Retrieved April 5, 2023, from <https://www.forgov.qld.gov.au/finance-and-procurement/procurement/procurement-resources/procurement-policies-and-frameworks/eliminating-modern-slavery>



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