



Modern Slavery Statement 2025

Reporting period 1 January 2025 - 31 December 2025
Southern Cross Care (NSW & ACT) | ABN: 76 131 082 374



Acknowledgement of Country

Southern Cross Care (NSW & ACT) acknowledges the Traditional Owners of the land and the waters upon which we work and live.

We pay our respects to the Elders past, present and future, for they hold the memories, the traditions, the culture and hopes of Aboriginal and Torres Strait Islander peoples across Australia.

A better understanding and respect for Aboriginal and Torres Strait Islander cultures develops an enriched appreciation of Australia's cultural heritage and can lead to reconciliation. This is essential to the maturity of Australia as a nation and fundamental to the development of an Australian identity.

Artwork: Life on Country by Aunty Kerrie Kenton

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Message from the Chair

For more than five decades, Southern Cross Care (NSW & ACT) has upheld a strong tradition of delivering compassionate, high quality aged care, founded on respect and guided by our belief in the fundamental dignity of older Australians.

Our mission extends beyond addressing physical needs; it embraces the nurturing of emotional, social and spiritual wellbeing throughout our communities.

This belief in the worth and humanity of every person extends to everyone we work with.

It shapes the way we engage with residents, staff, suppliers, and partners, and it inspires our ongoing efforts to eliminate modern slavery and promote ethical and responsible practices across our organisation and supply networks.

Since joining the Australian Catholic Anti-Slavery Network (ACAN) in 2020, and through the leadership of our Modern Slavery Working Group, we have continued to strengthen our frameworks, deepen our understanding of risk, and enhance our organisational response.

Our sixth Statement highlights significant progress made in 2025. We strengthened supplier onboarding and risk management processes, improving visibility and accountability across our supply chain. We also advanced our work with key supply partners to ensure all high-risk products meet certified compliance, reducing exposure to unethical practices. In addition, we broadened grievance and remediation pathways through the introduction of the 24-hour Domus 8.7 hotline and expanded external reporting guidance to support staff, suppliers, and community members in raising concerns safely.

Alongside these measures, 38% of our employees took part in our Modern Slavery learning program, supported by ACAN training for leaders. Their engagement reflects our shared commitment to building a workforce that is informed, vigilant, and confident in recognising and responding to modern slavery risks.

Looking ahead, our top priorities for 2026 focus on people, awareness, and strengthening the systems and tools that support our workflows and data.

As a Board, we remain committed to ensuring these priorities are embedded across the organisation and supported by strong governance.

We will assess opportunities to prioritise domestic manufacturing options to improve supply chain transparency and reduce modern slavery risks. We will continue to educate and train Southern Cross Care (NSW & ACT) staff to recognise the signs of modern slavery. And we will maintain compliance of high risk goods by partnering with approved and reliable suppliers across all tiers of the supply chain.

Modern slavery remains a serious global challenge, with an estimated 41,000 people affected in Australia and 50 million worldwide. Southern Cross Care (NSW & ACT) remains steadfast in our responsibility to address this injustice and uphold strong human rights protections.

We remain committed to working closely with our suppliers, partners, and communities to foster an environment where exploitation is eliminated and every individual is treated with dignity and respect.

Principal Governing Body Approval Date

This Modern Slavery Statement was approved on 01 June 2026 by the principal governing body of Southern Cross Care (NSW & ACT), ABN 76 131082 374, as defined by the Modern Slavery Act 2018 (Cth) ("the Act").

This Modern Slavery Statement is signed by a responsible member of Southern Cross Care (NSW & ACT), as defined by the Act.



Caroline Waldron
Chair



About us

At Southern Cross Care (NSW & ACT), our purpose is to enable older people to live life to the full. Guided by our values of Honesty, Empathy, Acceptance, Respect and Teamwork, we are committed to providing exceptional care that meets the physical, emotional, and spiritual needs of every person we serve.

As an organisation entrusted with the wellbeing of older Australians, we recognise our responsibility to uphold the highest standards of ethical conduct. This includes ensuring that the people, services, and supply chains we rely on reflect our commitment to dignity, fairness and respect for human rights. We believe that every individual whether a resident, client, employee, volunteer, or worker within our broader supply network deserves to be treated with care, safety, and integrity.

We deliver personalised, quality care and support services across our network of Retirement Villages, Support at Home services and Residential Aged Care homes in more than 40 locations, including regional communities. Every day, we support thousands of people to live with purpose and dignity, and this commitment extends to ensuring our operations are free from exploitation and aligned with our values.



2025 Achievements

Southern Cross Care (NSW & ACT) is committed to upholding the dignity of every person by actively identifying, managing, and reducing the risk of modern slavery across our operations and supply chains. Grounded in our Catholic values and guided by our mission to support the most vulnerable, we recognise the vital role we play in promoting ethical sourcing, safeguarding human rights, and influencing meaningful change through our partnerships.

In 2025, we further educated SCC staff and raised awareness, introducing new workflows and systems to better understand supply chain data and enhance our Modern Slavery risk management program.

Key achievements include:

- * Enhanced vendor governance and strengthened supplier risk management protocols during the onboarding of new suppliers. Leveraging data enables SCC to maintain a proactive approach in understanding its entire supply chain and assessing global impacts.
- * Ongoing strategic collaboration with Bunzl to improve visibility into Tier 2 supply chains and reduce the number of high-risk items lacking certified compliance, including the removal or replacement of unaudited high-risk SKUs. All top high-risk products sourced through Bunzl now meet compliance, using Bunzl Certified products.
- * A total of 859 SCC employees completed the SCC Modern Slavery learning program, with the awareness campaign now incorporating additional ACAN modern slavery training and targeted sessions for SCC leaders.
- * Facilitated dedicated breakout sessions at the SCC Leadership Conference focused on modern slavery, emphasising the importance of practical awareness and outlining actionable pathways when signs are identified in day-to-day operations.
- * Mapped the SCC Risk Taxonomy to align with ACAN reporting requirements and introduced MS risk assessments into high risk categories through SCC contractual provisions.
- * Broadened grievance and remediation channels by launching the 24 hour Domus 8.7 hotline and publishing external website guidance with contact details, reporting mechanisms, and victim support resources.

Our focus:

Our actions are informed by the Australian Modern Slavery Act 2018 (Cth) and our participation in the Australian Catholic Anti-Slavery Network (ACAN), which continues to provide important guidance and benchmarking.

We will continue our journey and approach through building stronger data systems, more targeted supplier due diligence, and expand initiatives with industry partners to support greater supply chain transparency. We remain committed to continuous improvement, collaborative action, and the creation of systems that uphold human dignity across every part of our work.

Criterion 1

Our Structure

Southern Cross Care (NSW & ACT) is dedicated to improving the lives of older Australians through a broad range of compassionate services, including Support at Home, Retirement Communities and Residential Aged Care. With a presence across numerous locations in New South Wales and the Australian Capital Territory, SCC is embedded within the communities it serves, responding to local needs and supporting older people to live with dignity and purpose.

Our approach is grounded in our HEART values of honesty, empathy, acceptance, respect and teamwork. These values shape our culture, guide decision-making and inform how we engage with residents, clients, staff, suppliers and the broader community. Ethical integrity is central to our operations, and this Modern Slavery Statement reflects SCC's commitment to transparency, accountability and respect for human rights across all aspects of our business.

Our operations and supply chain



2,230

Dedicated
Staff



4,173

Residents and
Clients supported



40

Towns / Communities
Served



27

Retirement
Communities



27

Residential
Care Homes



350

Support at Home
Suburbs Serviced

Criterion 2

Our operations and supply chain

Organisational Chart



Operations

Southern Cross Care (NSW & ACT) delivers Residential Aged Care, Support at Home and Retirement Living services supported by corporate and operational functions. Our services rely on a broad network of suppliers that enable the safe and effective delivery of care and support to residents and clients.

Our operations are supported by a strong network of 1,651 suppliers, ensuring the smooth delivery and ongoing enhancement of our services. Most of these suppliers are based in Australia and share our values of integrity and accountability, further strengthening our commitment to supporting the local supply chain.

Governance

Governance of modern slavery risk management is overseen by SCC's Modern Slavery Working Group, which is responsible for coordinating supplier due diligence, risk identification and mitigation activities. These activities are connected to executive governance, with regular reporting to the Executive Leadership Team, CEO and Board to ensure modern slavery remains a strategic and organisational priority.

Our Modern Slavery Working Group met quarterly throughout 2025, with representatives from seven departments and an 82% attendance rate, ensuring a coordinated, informed response to modern slavery risks. The team's cross-functional composition including procurement, IT, marketing and communications, people and culture, facilitates the integration of supplier engagement processes and data insights into our operational strategy. These meetings, continuing into 2026, are focused on strengthening our comprehensive approach by expanding the group to include additional stakeholders and experts. This expansion ensures alignment with ACAN's framework for systematic supply chain risk assessment, ongoing supplier education, and transparent reporting.

A dedicated Modern Slavery Liaison Officer (MSLO) holds accountability for delivery and oversight of SCC's modern slavery strategy and initiatives, acting as a conduit and collaboration lead with internal and external stakeholders. Our CEO and Board receive regular updates, ensuring executive oversight of our progress.

The established governance framework also facilitates a swift and structured process for escalation of modern slavery issues to the board.

In July 2025, we distributed our Modern Slavery Statement to suppliers, published it on our website and internal Heart HQ platform, and reinforced our commitment to openness with all stakeholders.

Supply chains

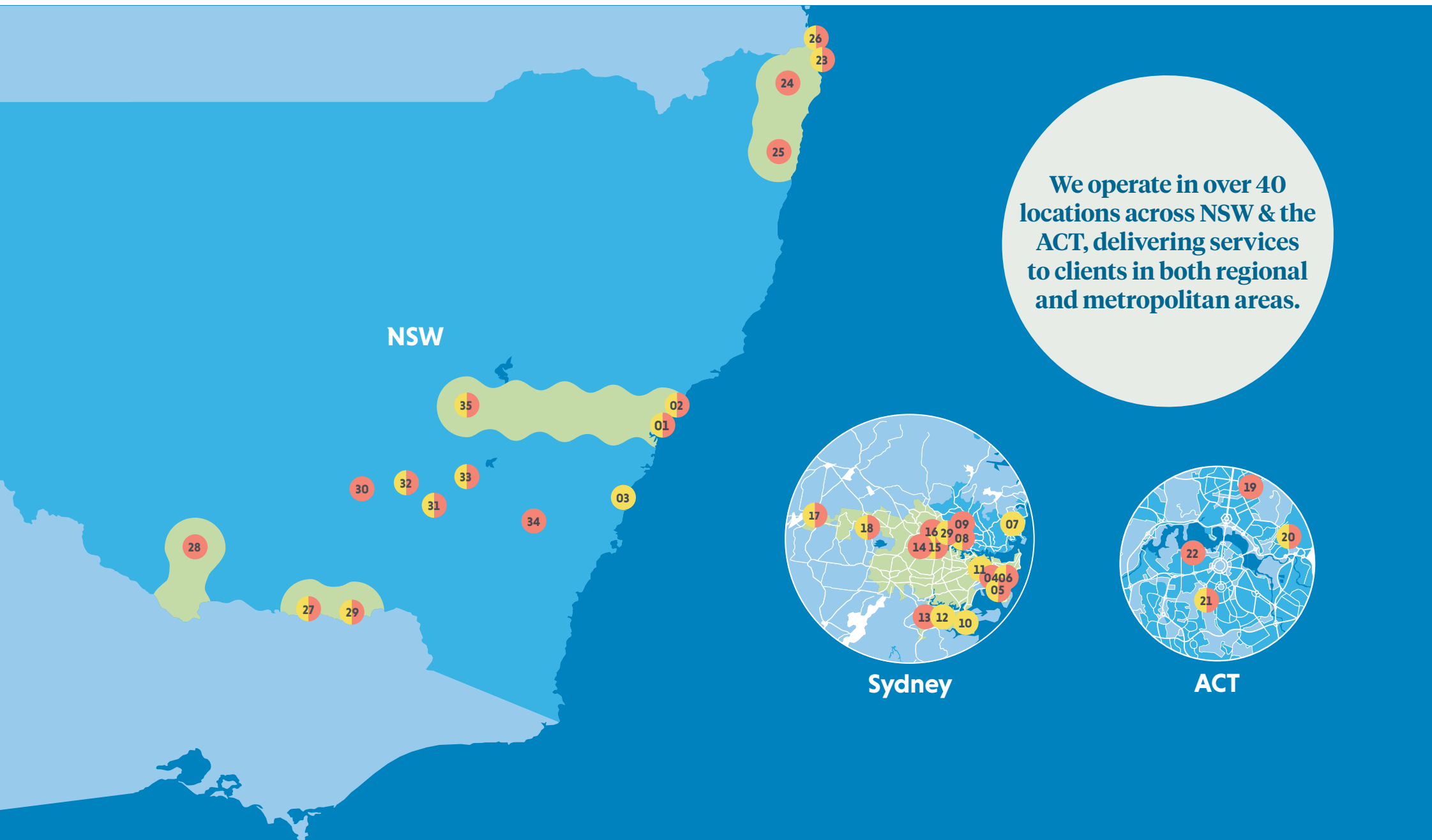
Southern Cross Care (NSW & ACT) relies on a diverse and complex supply chain to deliver essential services to older Australians across Residential Aged Care, Support at Home, and Retirement Living. Our supply partners range from large national providers to small local businesses, with the majority based in Australia.

This enables us to maintain strong relationships, support the local economy, and uphold shared values of dignity, integrity, and care.

Goods and services are sourced across a wide range of categories, including:

- * Clinical and care services, including medical equipment and consumables, pharmaceuticals, infection control supplies, and personal protective equipment (PPE).
- * Hospitality and domestic services including catering, food and beverage supply, linen, laundry, cleaning, and waste management.
- * Facilities and property management including construction, maintenance, capital works, and refurbishment of aged care homes and retirement villages.
- * Information and communications technology including software and hardware, digital infrastructure, cybersecurity services, and system support.
- * Corporate and professional services including legal, financial, human resources, communications, marketing, insurance, and audit services.
- * Utilities and fleet including energy, water, telecommunications, vehicle leasing, and transport logistics.
- * Labour and workforce including agency staffing, recruitment providers, consultants, and contractors, including a small cohort of visa holders.

Where you can find us



NSW Metropolitan

Central Coast

- 01 Bateau Bay 
- 02 Caves Beach 

Illawarra Shoalhaven

- 03 Thirroul 

Sydney East

- 04 Daceyville 
- 05 Maroubra 
- 06 South Coogee 

Sydney North

- 07 Manly Vale 
- 08 Marsfield 
- 09 North Turramurra 

Sydney South

- 10 Caringbah 
- 11 Marrickville 
- 12 Kirrawee 
- 13 Sutherland 

Sydney West

- 14 Greystanes 
- 15 Merrylands West 
- 16 North Parramatta 
- 17 Penrith 
- 18 Plumpton 

ACT

- 19 Braddon 
- 20 Campbell 
- 21 Garran 
- 22 Yarralumla 

NSW Rural & Regional

Northern NSW

- 23 Banora Point 
- 24 Casino 
- 25 Grafton 
- 26 Tweed Heads South 

Riverina

- 27 Corowa 
- 28 Deniliquin 
- 29 Lavington 
- 30 Leeton 

South West Slopes

- 31 Cootamundra 
- 32 Temora 
- 33 Young 

Southern NSW

- 34 Goulburn 

Western NSW

- 35 Parkes 

Legend

-  Retirement Villages
-  Residential Care
-  Support at Home

Criterion 3

Modern Slavery risks

Southern Cross Care (NSW & ACT) recognises that modern slavery risks may exist within both our operations and supply chains. In 2025, SCC continued to assess these risks through internal risk assessment processes and participation in the Australian Catholic Anti-Slavery Network (ACAN) Modern Slavery Risk Management Program.

Supply chain risks

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

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

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

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

- * **Geography:** the country or location where a good is made or service is delivered
- * **Industry:** the sector in which the making of goods or delivery of service occurred
- * **Commodity:** the raw materials or components that comprise the goods or products
- * **Workforce vulnerability:** such as bonded visas, temporary migrants, women or children known to be employed in specific industry sectors
- * **Domus 8.7:** trends, cases, and risk intelligence identified through the Domus 8.7 remediation service, including grievances and remediation insights relevant to category and risk to workers.

SCC's procurement activities span multiple categories and involve a diverse supplier base. Through our collaboration with ACAN and using ACAN's Category Risk Taxonomy, we have identified elevated risk in the following supplier categories:



Low Risk	Medium Risk	High Risk
• Professional services • Financial expenses • Government and agency fees • License / membership fees	• Advertising & Marketing • ICT Software and network services - onshore • Utilities • Fleet management, consumables and maintenance • Travel and accommodation • Print / Mail Provider	• Building and construction • Cleaning and Security • Events and event management • Facility management and property maintenance • Finance and Investment • Food and catering services • Furniture and office supplies • ICT Hardware • ICT Software and network services - offshore • Labour Hire • Linen, laundry and textile products • Medical devices and supplies • Transport, logistics and warehousing • Uniforms and PPE • Waste management services

People risks

Modern slavery risks may also arise within operations, particularly where contracted or agency labour is engaged. While the majority of SCC's workforce is directly employed under enterprise agreements or employment contracts, reliance on third party labour for specialist or surge capacity needs can increase vulnerability.

SCC actively promotes awareness of modern slavery by providing ongoing training and maintaining open communication. This ensures that our colleagues can identify warning signs and are well equipped with the necessary procedures and appropriate channels.

Although no instances of modern slavery have been identified within SCC's operations, the organisation acknowledges the hidden nature of exploitation and remains vigilant through training, monitoring and governance controls.

Criterion 4

Actions taken to assess and address risks

In 2025, SCC continued its active membership with ACAN, supporting sector wide collaboration, knowledge sharing and benchmarking. ACAN engagement informs SCC's risk identification methodology, supplier engagement approach and continuous improvement planning.

Strategic partnerships and governance

Southern Cross Care (NSW & ACT) maintained active membership in the ACAN, fostering sector-wide collaboration and leveraging ACAN's supplier engagement support. Since joining in 2020, our partnership has enabled us to access ACAN's data-driven supply chain risk assessment tools, systematic evaluation using the ACAN Risk Taxonomy, and the purpose-built ROTA platform for centralising risk management activities and supplier performance monitoring. Through ongoing participation, we have engaged in peer benchmarking, knowledge sharing, and joint submissions to the modern slavery public register, while ACAN's involvement in our Modern Slavery Working Group meetings has provided expert guidance and enriched our strategy.

Supplier engagement and risk management

In 2025, we analysed \$126 million in spend across 1,651 suppliers and 30 procurement categories using our spend management platform. This enabled targeted risk assessments by sector, geography and spend.

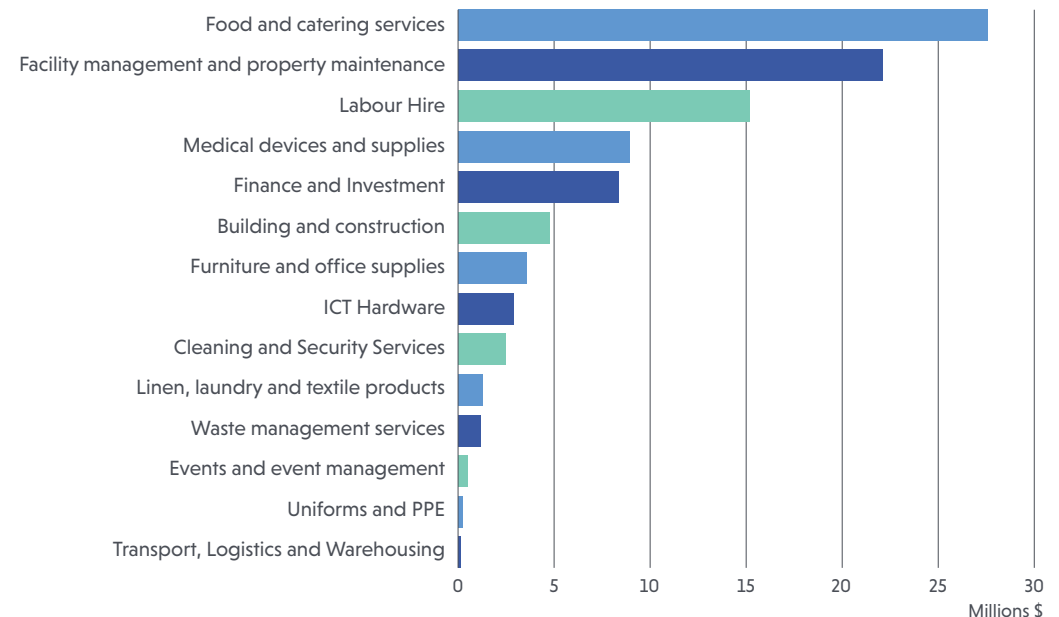
Our methodology encompasses the use of the ACAN Supplier Survey to collect essential details regarding supplier operations, the implementation of targeted supplier education initiatives addressing key risk areas, onboarding suppliers onto Sedex and facilitating completion of the Self-Assessment Questionnaire (SAQ), conducting desktop reviews to determine necessary actions, and strengthening supplier screening processes through Know Your Client (KYC) intelligence software.

To address emerging needs, SCC has incorporated provisions within its standard terms requiring suppliers to undergo Corporate Social Compliance Audits when required. These audits provide objective, independent, and timely assessments of suppliers' adherence to local regulations and worker wellbeing standards, serving as crucial checkpoints for ongoing compliance and ethical conduct.

We evaluate selected suppliers operating in high-risk categories using the Domus 8.7 Index modern slavery statement assessment. This enables us to identify opportunities for improvement where SCC can collaborate on targeted initiatives with our suppliers to effectively mitigate potential risks related to modern slavery and human rights abuses within our supply chain.

We also utilise the ACAN Prequalified Supplier Directory, a curated register of preferred suppliers accessible to Catholic organisations, to streamline the selection of vendors who meet defined compliance and ethical benchmarks.

2025 Supplier Spend by Category



By integrating these tools and methodologies into our procurement processes throughout the supplier lifecycle, we maintain a comprehensive and proactive framework. This approach promotes transparency, accountability, and robust risk mitigation.

Key actions included:

- * Updated SCC contracts mandating high risk suppliers to onboard with SEDEX, ensuring ongoing engagement and transparent reporting in line with our compliance and ethical standards.
- * We launched a dedicated supplier management tool. This platform provides SCC with enriched data and advanced analytics, supporting more informed decision-making, supplier onboarding, ongoing monitoring, and continuous improvement across our supply chain.
- * Featuring our modern slavery statement in the internal Take 5 publication, accompanied by an endorsement from the Chair of the Board.

By aligning our efforts with ACAN's supplier engagement framework including the ROTA platform, comprehensive risk taxonomy, and structured supplier evaluation tools, we demonstrate a robust, collaborative, and transparent modern slavery risk management program.

Training and awareness

In 2025, Southern Cross Care (NSW & ACT) continued to advance its modern slavery education and training program across the organisation.

- * Our e-learning module was introduced into the learning package, and completed by 859 staff members
- * Training completion rates across teams reached an organisational average of 95%, with the Executive Team achieving 100% participation.
- * SCC expanded its Learning Management System (LMS) with a new Modern Slavery training module developed by ACAN, focusing on business relevance, grievance, and remedy. The Modern Slavery Working Group has approved the content and SCC plans to launch these courses for its leaders in 2026.
- * At the 2025 Southern Cross Care (NSW & ACT) Conference, ACAN facilitated breakout sessions with senior SCC leaders and Aged Care Residential Managers to enhance education and reinforce best practices in daily operations.

The Southern Cross Care (NSW & ACT) intranet continues to be updated with modern slavery statistics from the Global Slavery Index, relevant news articles, and video resources to increase awareness and staff understanding of the issue in both global and local contexts.

Criterion 4

Actions taken to assess and address risks



Grievance mechanisms and reporting

Southern Cross Care (NSW & ACT) now offers a range of confidential reporting channels for modern slavery risks, including the recent addition of an independent external hotline Domus 8.7 to further safeguard staff concerns.

- * A whistleblower hotline is available to all employees for reporting misconduct, including concerns related to modern slavery.
- * A dedicated supplier grievance channel is managed by our procurement team. While no modern slavery-related complaints were received in 2025, Southern Cross Care (NSW & ACT) remains vigilant and ready to respond.
- * In the event of a breach, Southern Cross Care (NSW & ACT) commits to engaging with the relevant supplier within 24 hours and works closely with ACAN to support remediation.
- * Broadened grievance and remediation channels by implementing the 24-hour Domus 8.7 hotline that remains independent from SCC operations to help with reinforcing independence if our team suspects Modern Slavery indicators are present

Southern Cross Care (NSW & ACT) 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 Southern Cross Care (NSW & ACT):

- * 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

The Domus 8.7 Advisory Committee Members also include a person with lived expertise, Mr Moe Turaga. Domus 8.7 is a registered charity with the Australian Charities and Not-for profits Commission (ACNC) and is an endorsed Public Benevolent Institution with Deductible Gift Recipient (DGR) status. ABN 244 72497189

Communication and ongoing engagement

Southern Cross Care (NSW & ACT) recognises that fostering awareness and maintaining open communication are essential to sustaining a culture that actively identifies and responds to modern slavery risks. In 2025, we continued to implement a range of communication and engagement initiatives designed to enhance understanding across our workforce and the broader community.

- * Southern Cross Care (NSW & ACT) collaborated with suppliers to support the development of modern slavery awareness and risk management practices where there was limited prior exposure, and communicated our progress through our internal newsletter publication Take 5 in October 2025.
- * In June 2025, the signed Modern Slavery Statement was featured on our external website, accompanied by a message from the Chair of the Board, reaffirming our dedication to ethical integrity and transparency.
- * An open invitation webinar was held in partnership with ACAN for all internal staff, providing an opportunity to participate, ask questions, and discuss the implications of Modern Slavery on our organisation. The session also introduced the establishment of Domus 8.7 within our reporting channels.

Criterion 5

Assessing our effectiveness

In 2025, SCC continued to strengthen its approach to assessing the effectiveness of modern slavery risk management activities. Through ACAN, SCC participates in a data-driven risk management framework, including the transition to globally recognised measurement methodologies through Sedex.

Effectiveness is monitored through supplier participation in ACAN programs, completion of training and capacity-building initiatives, tracking of corrective actions, utilisation of grievance mechanisms and baseline analytics provided by ACAN. These measures establish a benchmark for year-on-year improvement and inform future prioritisation.

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, Southern Cross Care (NSW & ACT) 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 Southern Cross Care (NSW & ACT) is a substantial measure of continuous improvement year on year. Below is an explanation of how scoring is calculated using the SEDEX SAQ and SCC's 2025 risk scores and management controls that will serve as our benchmark for continuous improvement.

Combined & Inherent Risk Score

Explanation of Scoring

Combined Risk Score 3.8/10 - 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.

3.8/10
Low risk

Inherent risk score

Inherent Risk Score 3.4/10 - predicts potential risks based on a country/region, and sector. Spanning all four pillars, this score is broken down by topics.

3.4/10
Low risk

- * 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.

3.3/10

Labour standards

4.6/10

Health & safety

2.6/10

Business ethics

3.5/10

Environment

Site Characteristics Risk

Drivers include:

- * 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.

7.4/10

Labour standards

4.7/10

Health & safety

6.6/10

High risk

Management Controls

This score measures how well policies or processes are in place to reduce the risks from the site characteristics.

4/5

Drivers include:

- * 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.
- * Environment - looks at policies managing environmental impact, resource efficiency and waste reduction practices to align with sustainability standards.

4/5

Advanced
Labour standards

3.9/5

Good
Health & safety

2.7/5

Moderate
Business ethics

2.2/5

Moderate
Environment

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	2025
Hours spent on modern slavery activities	100	130
Individual staff completed e-learning	1882	919
E-learning modules completed	6	919
Total number of suppliers	1861	1651
Number of suppliers with visible contact information and ABN	1687	1609
Number of suppliers across high-risk categories	835	1004
Number of ACAN Supplier Surveys completed*	184	421
Supplier staff attending capacity building webinars	32	23
Invited to join Sedex*	19	80
Joined Sedex*	49	50
Sedex SAQ completed*	9	32
Social audits	1	0
Corrective actions	26	0
Contacts made via worker voice / grievance mechanism	30	
Referrals for advice and assistance	0	
Individuals identified or referred for modern slavery	0	
Individuals with modern slavery cases remediated	0	

*cumulative

Criterion 5

Assessing our effectiveness

	Southern Cross Care (NSW & ACT) Goals	Target	Date	Status	Update
1.a	Ensure our recruitment policy and procedures are well-documented and regularly reviewed to ensure Southern Cross Care (NSW & ACT) remains vigilant against potential risks.	Ensure recruitment policies are updated, reviewed, and aligned to prevention practices	2025	Completed	Recruitment policies are now consistently updated, reviewed, and aligned with prevention practices. This approach supports Southern Cross Care (NSW & ACT) in maintaining robust safeguards against potential risks, reinforcing our dedication to ethical integrity and the protection of vulnerable individuals within our community.
1.b	Attend monthly Modern Slavery ACAN webinars.	Ensure consistent attendance and participation.	Monthly	Completed	Southern Cross Care (NSW & ACT)'s Modern Slavery Steering Committee maintains active engagement with national best practice by participating in monthly Australian Catholic Anti-Slavery Network (ACAN) webinars.
1.c	Continue to educate and train Southern Cross Care (NSW & ACT) staff to understand and recognise the signs of Modern Slavery.	Deliver ongoing training programs.	2025	Completed	Southern Cross Care (NSW & ACT) implemented modern slavery training across its workforce, achieving organisational average of 90%, with the Executive Team achieving 100% participation. A dedicated all staff webinar was held in December 2024 to reinforce awareness and obligations.
1.d	Remind Southern Cross Care (NSW & ACT) staff about Southern Cross Care (NSW & ACT)'s commitment and obligations under the Modern Slavery Act.	Conduct regular awareness sessions.	Bi-annually	Completed	Internal communications have continued to highlight Southern Cross Care (NSW & ACT)'s responsibilities under the Modern Slavery Act, including regular updates through staff newsletters and leadership communications.
1.e	Include a Modern Slavery segment in the annual Southern Cross Care (NSW & ACT) conference.	Include Modern Slavery segment in the conference agenda.	Annual	Completed	During the 2025 conference, interactive breakout sessions were conducted in collaboration with ACAN, offering SCC Leaders a comprehensive exploration of modern slavery prevention. These sessions equipped leaders with a deeper understanding of why addressing modern slavery is critical and provided practical guidance on identifying potential warning signs within their teams. Following the presentations, the Q&A segment allowed participants to clarify procedures and discuss real-world scenarios, ensuring that SCC Leaders left with actionable knowledge and enhanced confidence in supporting team members and upholding SCC's commitment to ethical integrity.

	Southern Cross Care (NSW & ACT) Goals	Target	Date	Status	Update
1.f	Attend quarterly Modern Slavery Steering Committee meetings.	Ensure representation at all quarterly meetings.	Quarterly	Completed	Quarterly Steering Committee meetings are held to oversee Southern Cross Care (NSW & ACT)'s Modern Slavery strategy and monitor progress. Outcomes are formally documented and inform ongoing actions. ACAN has also been invited to attend and present at key meetings.
1.g	Ask our top 75 suppliers by spend to review and sign Southern Cross Care (NSW & ACT)'s Modern Slavery Attestation Statement	a. Achieve 100% review completion from top 50 suppliers. b. Achieve 100% supplier agreement from top 50 suppliers.	2025	Completed	Southern Cross Care (NSW & ACT) achieved 100% attestation from its top 75 suppliers by spend, confirming their review and agreement to Southern Cross Care (NSW & ACT)'s Modern Slavery Attestation Statement and supplier code of conduct.
1.h	Publish regular reports to stakeholders of Southern Cross Care (NSW & ACT)'s efforts and achievements	Form a strategic partnership and initiate a joint project.	2025	Completed	Throughout 2025, we collaborated with Bunzl on a joint initiative to replace all high-risk, non-compliant products purchased by SCC with Bunzl-certified alternatives. By December, we had identified substitutes for all non-compliant items, significantly reducing our exposure beyond our direct partnership with Bunzl. We are committed to maintaining this positive momentum into 2026.
1.i	Add content to Southern Cross Care (NSW & ACT)'s external website to remind our customers and suppliers about modern slavery risks	Publish content to the Suppliers & Procurement section of the Southern Cross Care (NSW & ACT) internet	2025	Completed	Southern Cross Care (NSW & ACT) successfully published its 2024 Modern Slavery Statement in the Suppliers & Procurement section of our internal internet. This initiative reinforces our ongoing commitment to transparency and ethical sourcing, ensuring all suppliers and procurement partners are kept informed of our efforts and standards regarding modern slavery risks and mitigation strategies.
1.j	Expand modern slavery training programs for the Procurement Team, to recognise and address modern slavery risks	All Procurement team members to complete modern slavery training modules two and three from ACAN	2025	Completed	All Procurement team members completed ACAN modern slavery training modules two and three, achieving full participation. The training was also extended to the Modern Slavery Working Group, and this roll out will continue in 2026.

Criterion 6

Consultation

As a single reporting entity, Southern Cross Care (NSW & ACT) undertakes internal consultation through structured cross-functional engagement. Our Modern Slavery Working Group, comprising representatives from procurement, legal, people and culture, marketing and communications, information technology, and operations, meets quarterly to review progress, assess risk, and guide strategic priorities.



Criterion 7

Future actions

In 2026, Southern Cross Care (NSW & ACT) will continue to enhance its response to modern slavery through governance, supplier engagement, training and transparency initiatives. Future actions include strengthening supplier engagement through ACAN, expanding training for staff and procurement teams, embedding modern slavery considerations into vendor reviews, and continuing collaboration with strategic suppliers to reduce risk within supply chains.

Southern Cross Care (NSW & ACT) Goals		Target	Date	Responsibility
1.a	Assess and prioritise the availability of domestic manufacturing options for required goods to support local industry, ensure supply chain transparency, and reduce modern slavery risks.	Identify and propose domestic manufacturing alternatives where feasible, and provide supporting evidence regarding sourcing, production, and labour practices within Australia.	2026	Procurement
1.b	Attend monthly modern slavery ACAN webinars	Ensure consistent attendance and participation.	Monthly	Procurement
1.c	Continue to educate and train Southern Cross Care (NSW & ACT) staff to understand and recognise the signs of modern slavery.	All Leaders at Band 4 or higher to complete modern slavery training modules two and three from ACAN	2026	People & Culture, Procurement
1.d	Remind Southern Cross Care (NSW & ACT) staff about Southern Cross Care (NSW & ACT)'s commitment and obligations under the modern slavery Act	Conduct regular awareness sessions.	Annual	People & Culture, Procurement
1.e	Include a modern slavery segment in the annual Southern Cross Care (NSW & ACT) conference	Include modern slavery segment in the conference agenda.	Annual	CEO, People & Culture, Procurement
1.f	Attend quarterly modern slavery Steering Committee meetings	Ensure representation at all quarterly meetings.	Quarterly	All
1.g	Ensure active SEDEX participation and onboarding for our top 50 high risk suppliers to enhance transparency and address modern slavery risks within our supply chain	Achieve 100% completion from top 50 suppliers	2026	Procurement
1.h	Maintain compliance of high-risk goods by strategically partnering with approved and reliable suppliers across all tiers of the supply chain, not just the first-tier, to ensure robust oversight and adherence to ethical standards	Transition of the Top 150 products purchased by SCC into closed basket of goods, accessible exclusively through our digital purchasing platform	2026	Procurement
1.i	Add content to Southern Cross Care (NSW & ACT)'s external website to remind our customers and suppliers about modern slavery risks	Publish content to the Suppliers & Procurement section of the Southern Cross Care (NSW & ACT) internet	2026	Procurement, Marketing and Communications
1.j	Establish consistent controls for contractor arrangements to mitigate modern slavery risks	Expand the use of our Contractor Management System to include mandatory pre-engagement due diligence checks and ongoing visa compliance monitoring for all labour hire contractors	2026	Procurement
1.k	Enhance organisation-wide engagement in modern slavery prevention by broadening staff and working group participation	Increase cross-departmental representation in the Modern Slavery Working Group to ensure diverse perspectives and stronger collaboration across all business units.	2026	All
1.l	Develop and publicly articulate a SCC Human Rights commitment that reinforces our dedication to upholding human rights and labour standards, supporting and enhancing our existing Modern Slavery Policy and Supplier Code of Conduct.	Draft, approve, and publish a formal written statement of SCC's commitment to human rights and labour standards, ensuring it is accessible to all stakeholders and effectively complements current policies and codes.	2026	CEO, People & Culture, Marketing and Communications

Glossary

ACAN	Australian Catholic Anti-Slavery Network	MSLO	Modern Slavery Liaison Officer
ACNC	Australian Charities and Not-for-profits Commission	NDIS	National Disability Insurance Scheme
ACT	Australian Capital Territory	NSW	New South Wales
ABN	Australian Business Number	PPE	Personal Protective Equipment
CEO	Chief Executive Officer	RAC	Residential Aged Care
CFO	Chief Financial Officer	ROTA	Risk management platform referenced by ACAN (name used as-is in document)
DGR	Deductible Gift Recipient	SAH	Support at Home
ICT	Information and Communications Technology	SAQ	Self-Assessment Questionnaire
IT	Information Technology	SCC	Southern Cross Care (NSW & ACT)
ILO	International Labour Organization	SEDEX	Supplier Ethical Data Exchange, a global membership organisation that provides a platform for businesses to manage and improve ethical performance in supply chain
ILAB	Bureau of International Labor Affairs (U.S. Department of Labor)	SKU	Stock Keeping Unit
KYC	Know Your Client	WHS	Work Health and Safety
LMS	Learning Management System		
MS	Modern Slavery (used contextually)		



we care
about
people