



Modern Slavery Statement 2024

Reporting period 1 January 2024 - 31 December 2024
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.

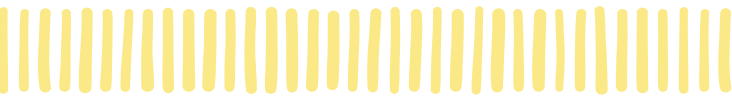
We pay our respects to the Elders past, present and future, for they hold the memories, the traditions, the culture and hopes of Aboriginal and Torres Strait Islander peoples across Australia.

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.



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About us

At Southern Cross Care (NSW & ACT), our purpose is clear: enabling older people to live life to the full. Our actions are guided by our values: Honesty, Empathy, Acceptance, Respect and Teamwork. We are committed to providing exceptional care that meets the physical, emotional, and spiritual needs of each person we serve. We believe in creating environments where every resident and client feels valued, connected, and supported.

We deliver personalised, quality care and support services across our network of Retirement Villages, Home Care services and Residential Care homes in over 40 locations, including regional communities. Every day Southern Cross Care supports thousands of people to live with purpose and dignity.



Message from the Chair

Southern Cross Care (NSW & ACT) upholds a 50-year legacy of compassionate aged care in Australia, founded on deep respect and unwavering support for our elders. We are committed to nurturing the physical, emotional, intellectual, social, and spiritual wellbeing of older Australians throughout our communities.

Our dedication to human dignity extends beyond residents and staff to everyone we engage with, driving our persistent efforts to combat modern slavery and uphold ethical practices across our supply chains and the broader aged care sector.

In recognition of this critical challenge, Southern Cross Care (NSW & ACT) joined the Australian Catholic Anti-Slavery Network (ACAN) in 2020. Through this strategic partnership, guided by our Modern Slavery Working Group, we have continuously strengthened our anti-slavery initiatives.

Our fifth Statement highlights significant progress made in 2024. From issuing a Modern Slavery Self-Attestation Statement to our top 50 suppliers to assure their alignment with our ethical standards, to implementing a comprehensive staff training and education program, these initiatives demonstrate Southern Cross Care (NSW & ACT)'s resolute approach to eliminating exploitation and injustice.

Our board, executive, and staff are equipped with the essential knowledge and tools to identify risks and address unethical practices. Through rigorous due diligence, targeted audits, and collaborative supplier relationships, we work to mitigate risks and uphold the highest ethical standards. By maintaining transparency and engaging with industry and the broader community, we strive to lead by example and inspire others to join us on our mission to stamp out modern slavery.

In 2025, we will strengthen our approach through strategic advancements in both policy development and operational implementation internally. Our comprehensive plan includes systematic reviews of recruitment policies and procedures, enhanced staff training initiatives, and regular awareness sessions that reinforce our team's understanding of Modern Slavery Act obligations.

Extending our impact beyond our organisation, we will enhance supplier accountability by requiring our top 75 suppliers to review and sign our Modern Slavery Attestation Statement, while featuring a dedicated session to modern slavery awareness and prevention at our annual Southern Cross Care (NSW & ACT) Conference.

Recognising the power of strategic alliances, we will continue our active participation in ACAN's monthly educational webinars. Upholding transparency as the foundation for meaningful action, Southern Cross Care (NSW & ACT) will publish regular progress reports and improve our website with educational content that empowers our staff, suppliers, and communities to recognise and address modern slavery risks.

Modern slavery persists as a global crisis, affecting an estimated 41,000 people in Australia and 50 million people worldwide. Southern Cross Care remains steadfast in our commitment to combating this injustice and adhering to the highest standards of human rights protection.

We look forward to working alongside our suppliers, partners and communities to create a world free from exploitation, where every person is treated with dignity and respect.

Principal Governing Body Approval Date

This Modern Slavery Statement was approved on 27 May 2025 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

Caroline Waldron, Chair



2024 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. Rooted 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 2024, we strengthened our approach to Modern Slavery risk management through deeper staff education, governance oversight, and supplier engagement.

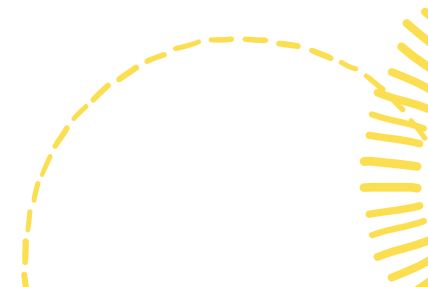
Key achievements include:

- Launching a dedicated Modern Slavery intranet hub for staff, featuring tools, resources, and our formal statements.
- Rolling out training programs across the workforce, supported by a staff-wide awareness webinar.
- Embedding modern slavery as a core consideration in our procurement and vendor review processes.
- Securing 100% attestation from our top 50 suppliers by spend, reinforcing shared expectations around ethical sourcing.
- Forming a strategic partnership with a key supplier to develop a co-designed initiative addressing modern slavery risk.

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.

Looking ahead, we will deepen our efforts through stronger data systems, more targeted supplier due diligence, and the launch of a joint initiative 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 Home Care, Retirement Communities, and Residential Aged Care facilities. With a presence in over 40 diverse locations, we are deeply ingrained in regional communities, addressing their unique challenges and distinct needs. Our human-centered approach is powered by our HEART values— honesty, empathy, acceptance, respect, and teamwork. These values not only infuse life into the culture of care but also shape the policies and interactions with all stakeholders, ensuring an environment where the elderly can thrive, not just survive.

Our commitment to building inclusive and supportive communities is reflected in all aspects of our work, from thoughtfully designed living spaces to engaging programs that nurture the physical, mental, spiritual, and social well-being of every individual.

Understanding the vital role of ethical integrity, Southern Cross Care (NSW & ACT) is steadfast in upholding ethical practices that respect the rights and dignity of every individual. Our Modern Slavery Statement is more than a declaration; it reflects our commitment to building a more transparent, responsible, and equitable world. Through rigorous oversight of our operations and supply chains, we challenge industry norms and set new standards for operating free from exploitation and injustice.

Operations

- 27 Residential Aged Care Homes across NSW & ACT
- 26 Retirement Living communities across NSW & ACT
- Home Care packages
- Commonwealth Home Support services
- Respite services
- Allied Health

Support services

- People & Culture
- Clinical Governance and Engagement
- Enterprise Risk and Process Transformation
- Customer Services
- Digital and Transformation
- Change and Sustainability
- Marketing and Communications
- Strategic Project Delivery and Data Governance
- Information Technology
- Finance and Procurement
- Property
- Legal
- Company Secretary
- CEO's Office

Criterion 2

Our operations and supply chain



2,224

Dedicated
Staff



4,037

Residents and
Clients supported



40

Towns / Communities
Served



26

Retirement
Communities



27

Residential
Care Homes



307

Home Care
Suburbs Serviced

Operations

Our operations are supported by a strong network of 1,895 suppliers, ensuring the smooth delivery and ongoing enhancement of our services. The majority 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

To manage Modern Slavery risks, our Modern Slavery Working Group oversees supplier compliance and due diligence activities. This includes risk classification based on supplier location, spend, and sector exposure.

Governance of these activities is directly connected to our Executive Leadership, with regular reporting to the CEO and Board. This ensures modern slavery remains a strategic priority and that our procurement decisions align with our ethical and legal responsibilities.

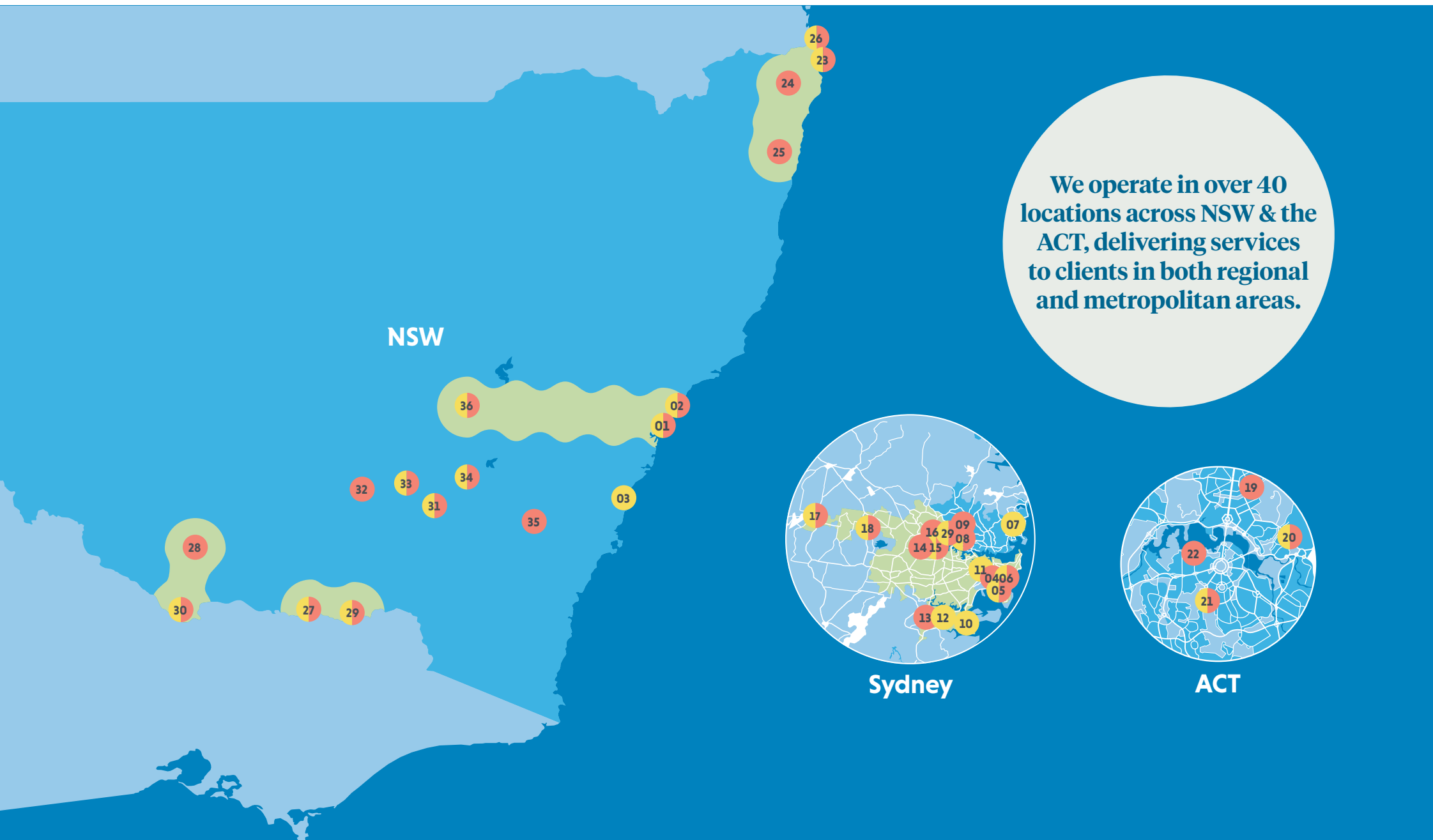
Supply chains

Southern Cross Care (NSW & ACT) relies on a diverse and complex supply chain to deliver essential services to older Australians across Residential Aged Care, Home Care, 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 Moama 

South West Slopes

- 31 Cootamundra 
- 32 Leeton 
- 33 Temora 
- 34 Young 




Southern NSW

- 35 Goulburn 

Western NSW

- 36 Parkes 

Legend

-  Retirement Villages
-  Residential Care
-  Home Care

Criterion 3

Modern Slavery risks

Southern Cross Care (NSW & ACT) recognises that the risk of modern slavery may exist across both our operations and supply chains. In 2024, we continued to assess these risks with the support of our spend management platform, supplier engagement efforts, and partnership with the Australian Catholic Anti-Slavery Network (ACAN).

Supply chain risks

Our procurement activities span 12 main categories and 45 sub-categories, involving 1,895 suppliers and \$111 million in spend during the reporting period. The breadth and complexity of our supply chain creates exposure to modern slavery risks, particularly in categories with outsourced labour, international sourcing, and limited supply chain transparency.

Through our collaboration with ACAN and our internal risk classification process, we have identified elevated risk in the following supplier categories:

- Medical equipment and consumables
- Property and maintenance services
- Construction and capital works
- Cleaning and waste management
- Personal protective equipment (PPE) and uniforms
- Linen and laundry
- Labour hire and agency staffing
- Food and catering services
- Information and communications technology (hardware and software)

These categories reflect common high-risk indicators, including multi-tiered supply chains, offshore manufacturing, and contract-based labour. In response, we have implemented supplier due diligence measures including risk tiering, attestation requirements and structured supplier engagement to monitor and manage these risks.

People risks

Modern slavery risks may also arise within our operations, particularly in relation to the use of contracted or agency labour. While most of our workforce is directly employed under enterprise agreements or individual employment contracts, we engage third-party labour for specialist or surge capacity needs.

The aged care sector, like many others, faces broader systemic pressures such as workforce shortages and increasing demand. These dynamics may elevate vulnerability among some cohorts, particularly migrant workers or those employed under indirect arrangements.

Although no direct instances of modern slavery have been identified within our operations, we remain mindful of the hidden nature of exploitation and the importance of maintaining strong internal awareness and oversight.

Criterion 4

Actions taken to assess and address risks

In 2024, Southern Cross Care (NSW & ACT) reinforced its commitment to identifying, addressing and eliminating modern slavery across our operations and supply chains. Our approach focused on education, governance, supplier engagement, risk mitigation and transparency.

Strategic partnerships and governance

We continued our active membership in the ACAN, supporting sector-wide collaboration. Since joining in 2020, this partnership has enabled knowledge sharing, peer benchmarking and joint submissions to the modern slavery public register. ACAN also participated in our Modern Slavery Working Group meetings, enriching our strategy with expert guidance.

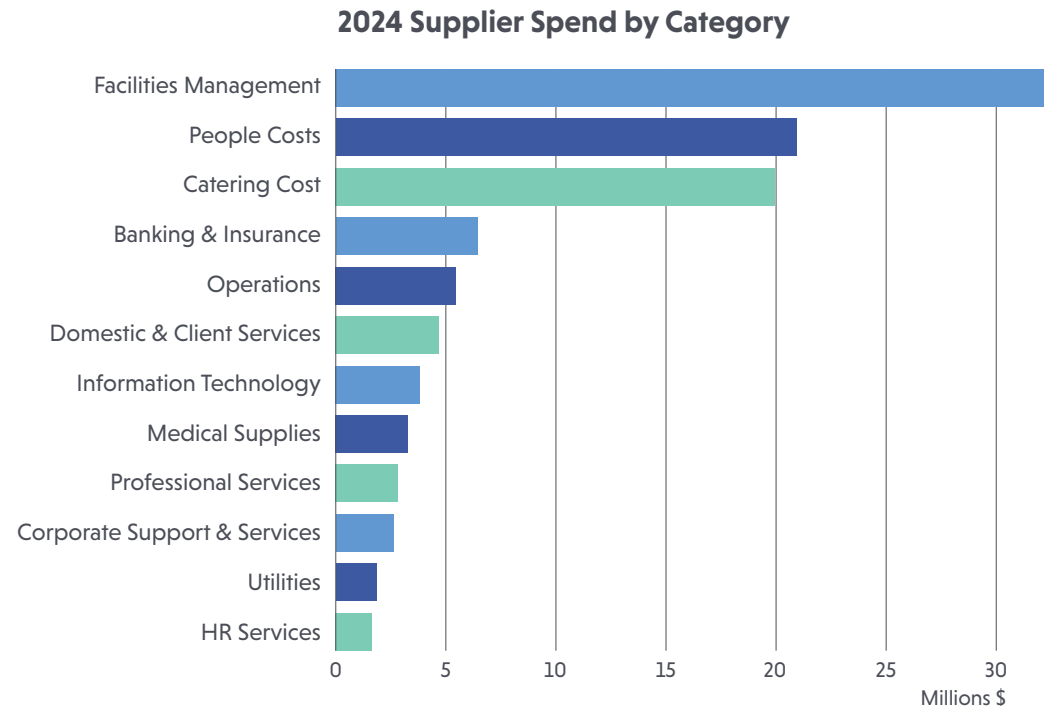
Southern Cross Care (NSW & ACT)'s Modern Slavery Working Group met quarterly in 2024, with participation from seven departments, achieving an 86% attendance rate. This cross-functional team, including representatives from procurement, IT, marketing and communications, people and culture, ensures a coordinated and informed response to modern slavery risks. These meetings will continue in 2025 to further strengthen our strategic response.

Our CEO and Board receive regular updates, ensuring executive oversight of our progress. In June 2024, we shared our Modern Slavery Statement with our supplier base, followed by publication on our company website and internal Heart HQ platform. This marked an important step in promoting transparency and awareness across all stakeholders.

Supplier engagement and risk management

In 2024, we analysed \$111 million in spend across 1,895 suppliers and 45 procurement sub-categories using our spend management platform. This enabled targeted risk assessments by sector, geography and spend.

Procurement categories:





Key actions included:

- Issuing Southern Cross Care (NSW & ACT)'s Modern Slavery Self-Attestation Statement to our top 50 suppliers, with 100 percent completion and endorsement.
- Conducting quarterly supplier meetings that included modern slavery as a standing agenda item, beginning with six key suppliers and with plans to expand to the top 20 in 2025.
- Featuring our modern slavery statement in the internal Take 5 publication, accompanied by an endorsement from the Chair of the Board.
- Meeting with strategic supplier partner Bunzl to co-design a joint initiative addressing modern slavery. Planning will continue in 2025, with shared deliverables and targets to be confirmed.

We maintain a robust approved supplier management system, including audits and reviews to assess compliance with Southern Cross Care (NSW & ACT)'s Modern Slavery Policy, Supplier Code of Conduct and attestation requirements.

Training and awareness

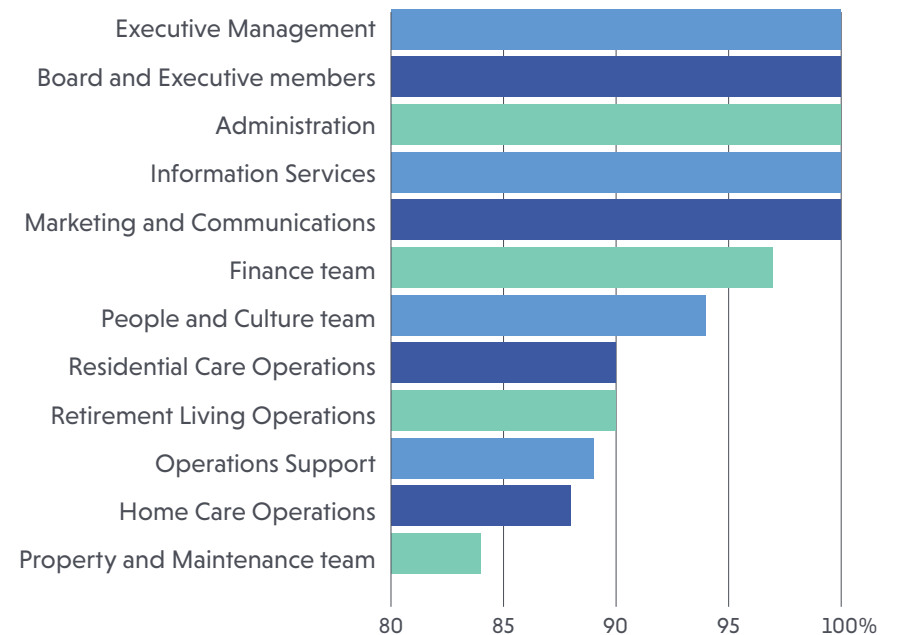
In 2024, Southern Cross Care (NSW & ACT) advanced its modern slavery education and training program across the organisation.

- Our e-learning module was integrated into the staff training platform, and a 30 minute ACAN led awareness webinar was attended by 77 staff.
- Training completion rates across teams reached an organisational average of 90%, with the Executive Team achieving 100% participation.
- A new online training module was developed and reviewed by the procurement team, with rollout planned for 2025.

- Modern slavery was included as a topic at the Southern Cross Care (NSW & ACT) Care Conference and in regular meetings with Residential Aged Care Facility Managers
- A staff awareness survey was conducted in December to help inform future training and engagement efforts.

The Southern Cross Care (NSW & ACT) intranet was also 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.

Modern Slavery Training Completion Rates



Grievance mechanisms and reporting

Southern Cross Care (NSW & ACT) provides multiple confidential channels for reporting modern slavery risks.

- 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 2024, 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.

- Modern slavery awareness was incorporated into ongoing conversations with frontline staff across sites, with Business Partners reinforcing key messages during visits.
- On 2 December 2024, Southern Cross Care (NSW & ACT) published a message across our social media platforms to mark the International Day for the Abolition of Slavery, raising public awareness and affirming our commitment to ethical and responsible care

These actions form part of our broader strategy to promote shared accountability, embed ethical practices, and keep modern slavery risk front of mind across all levels of our organisation.

Communication and ongoing engagement

Southern Cross Care (NSW & ACT) recognises that building awareness and maintaining open dialogue are essential to sustaining a culture that actively identifies and responds to modern slavery risks. In 2024, we implemented a range of communication and engagement initiatives to strengthen understanding across our workforce and broader community.

- In June 2024, Southern Cross Care (NSW & ACT) featured the signed Modern Slavery Statement in our internal Take 5 publication, accompanied by a message from the Chair of the Board reinforcing our commitment to ethical integrity and transparency.
- In August 2024, Southern Cross Care (NSW & ACT) Business Partners began including modern slavery as a regular agenda item in meetings with Residential Aged Care Facility Managers, supported by tailored presentations to enhance staff awareness.

Criterion 5

Assessing our effectiveness

In 2024, Southern Cross Care (NSW & ACT) made significant progress in strengthening its approach to identifying and addressing modern slavery risks. Through enhanced governance, supplier engagement, staff training, and awareness initiatives, we have embedded ethical practices more deeply across our operations and supply chains. The actions below demonstrate our commitment to continuous improvement and our obligations under the Modern Slavery Act 2018 (Cth).

Southern Cross Care (NSW & ACT) Goals		Target	Date	Status	Update
1.a	Build on and expand on Modern Slavery information on the Southern Cross Care (NSW & ACT) intranet.	Update and enhance Modern Slavery content on the intranet.	2024	Completed	A dedicated Modern Slavery information page has been launched on the Southern Cross Care (NSW & ACT) intranet. It includes an overview of modern slavery, key policies, external resources, Southern Cross Care (NSW & ACT)'s Modern Slavery Statements, relevant news articles, and staff training opportunities.
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	The 2024 Southern Cross Care (NSW & ACT) Leadership Conference included a session focused on Modern Slavery risks and our Laudato Si' aligned ethical sourcing priorities. Materials were provided to all attendees.

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.	Achieve 100% review completion from top 50 suppliers. Achieve 100% supplier agreement from top 50 suppliers.	2026	Completed	Southern Cross Care (NSW & ACT) achieved 100% attestation from its top 50 suppliers by spend, confirming their review and agreement to Southern Cross Care (NSW & ACT)'s Modern Slavery Attestation Statement and ethical sourcing principles.
1.h	Develop a strategic partnership with a current vendor for a joint initiative to help combat Modern Slavery.	Form a strategic partnership and initiate a joint project.	2025	Completed	A strategic partnership was established with Bunzl to co-design a joint initiative aimed at reducing modern slavery risk in supply chains. The project scope and shared KPIs are being finalised for implementation in FY2026.
1.i	Include relevant Southern Cross Care (NSW & ACT) stakeholders in vendor reviews and include Modern Slavery as an area of discussion.	Incorporate Modern Slavery topics into vendor reviews.	2025	Completed	A supplier risk classification system has been introduced, incorporating country of origin, spend, and sector risk indicators. Modern Slavery is now a standing agenda item in procurement-led vendor reviews.

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.

Input from these teams supports the development of our Modern Slavery Statement and ensures our organisation-wide actions are informed, coordinated, and aligned with our values and compliance obligations. Regular updates are provided to our CEO and Executive Team, with oversight maintained by our Board.



Criterion 7

Future actions

In alignment with commitment to the dignity of all people and the stewardship of our global community, Southern Cross Care (NSW & ACT) is dedicated to continuing and enhancing our efforts against modern slavery in 2025. Our approach is holistic, emphasising care for people and the planet, and includes the following focused objectives:

	Southern Cross Care (NSW & ACT) Goals	Target	Date	Responsibility
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.	Update and recruitment policies are updated, reviewed and aligned to prevention practices	2025	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.	Deliver ongoing training programs.	2025	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.	Bi-annually	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	Care Operations, Procurement
1.f	Attend quarterly modern slavery Steering Committee meetings.	Ensure representation at all quarterly meetings.	Quarterly	Procurement
1.g	Ask our top 75 suppliers by spend to review and sign Southern Cross Care (NSW & ACT)'s Modern Slavery Attestation Statement.	Achieve 100% review completion from top 50 suppliers. Achieve 100% supplier agreement from top 50 suppliers.	2025	Procurement
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	CEO, 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.	2025	Procurement, Marketing and Communications
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	Procurement



we care
about
people