

Modern Slavery Statement



2025

*O God, who made Saint Peter Claver a slave of slaves
and strengthened him with wonderful charity and patience
as he came to their help,
grant, through his intercession,
that, seeking the things of Jesus Christ,
we may love our neighbour in deeds and in truth.
Through our Lord Jesus Christ, your Son,
who lives and reigns with you in the unity of the Holy Spirit,
one God, for ever and ever.*

Catholic Schools NSW Limited (CSNSW)
ABN 46 619 593 369
and its wholly owned subsidiary
Catholic Employment Relations Ltd (CERL)
ABN 37 643 423 885

Artwork on next page: Reconciliation of the 11 Catholic Dioceses within NSW

Artist: Lewis Hennessy

Year: October, 2017

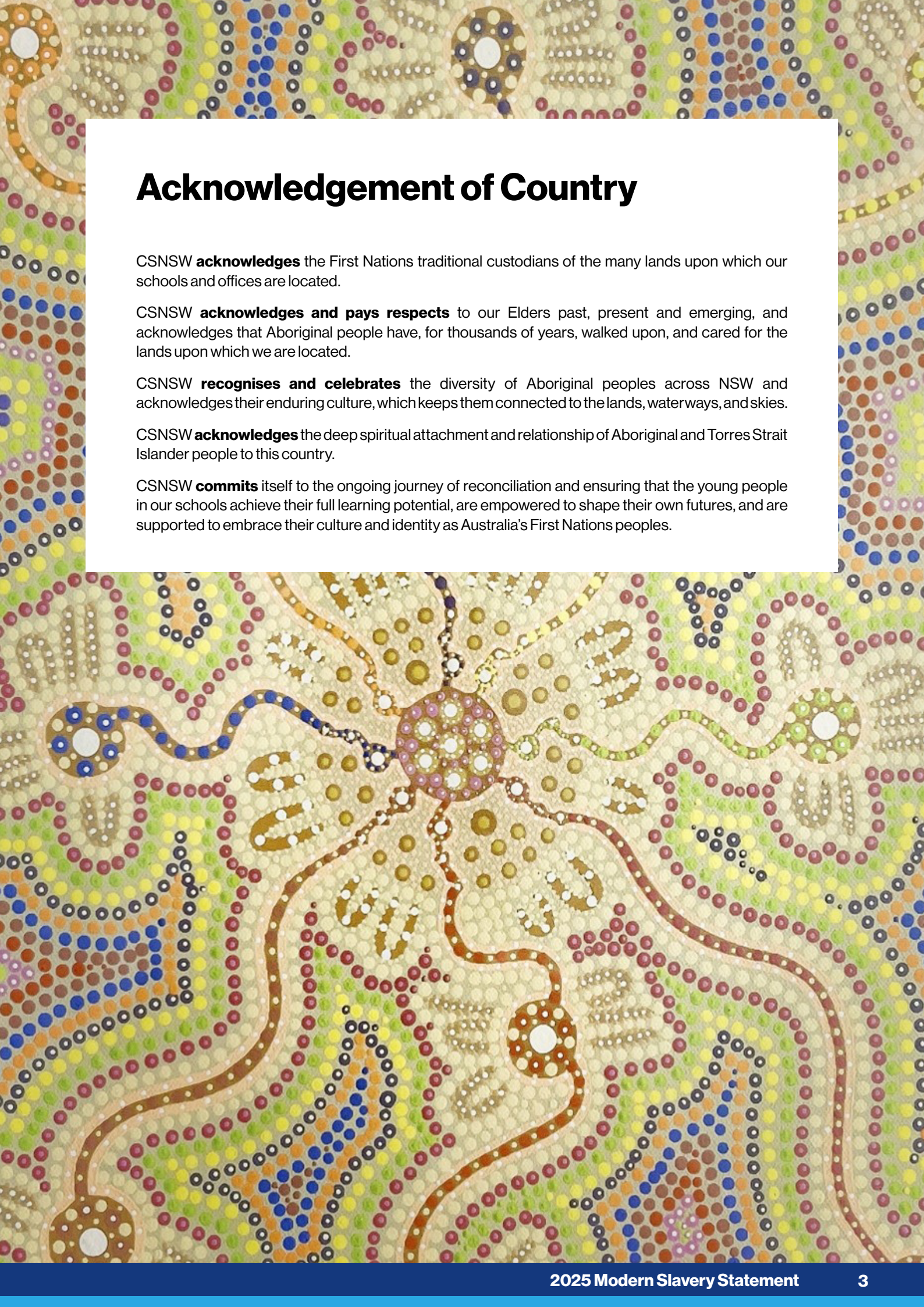
Medium: Acrylic on Canvas.

Dimension: 16X20

Country/Mob: Bundjalung – North-Eastern, New South Wales

A campfire/yarning circle that is based in the centre of the painting represents Aboriginal communities. This is where the knowledge is shared and stories are learned, respect is taught, responsibility is told and culture is grown. The second outer circle represents Aboriginal peoples and communities that hold and share the knowledge and respect that is passed along. The outer 11 Circles represent the 11 Catholic Dioceses and their journey to the campfire to learn knowledge, building relationships, respect, understanding of culture and connections to communities. Reciprocity is formed between communities and Catholic Dioceses working together for reconciliation within all communities.





Acknowledgement of Country

CSNSW **acknowledges** the First Nations traditional custodians of the many lands upon which our schools and offices are located.

CSNSW **acknowledges and pays respects** to our Elders past, present and emerging, and acknowledges that Aboriginal people have, for thousands of years, walked upon, and cared for the lands upon which we are located.

CSNSW **recognises and celebrates** the diversity of Aboriginal peoples across NSW and acknowledges their enduring culture, which keeps them connected to the lands, waterways, and skies.

CSNSW **acknowledges** the deep spiritual attachment and relationship of Aboriginal and Torres Strait Islander people to this country.

CSNSW **commits** itself to the ongoing journey of reconciliation and ensuring that the young people in our schools achieve their full learning potential, are empowered to shape their own futures, and are supported to embrace their culture and identity as Australia's First Nations peoples.

Statement, Approval and Signature from the Interim Chair

CSNSW is an organisation grounded in service according to the teaching of Jesus Christ. Our commitment to service extends to all whom we encounter through our work, the students entrusted to our schools, the families we serve, the educators we support, and the wider community connected to Catholic education.

In 2025, CSNSW has continued to uphold this commitment through practical action and addressing modern slavery risks within our operations and supply chains.

Modern slavery represents a profound violation of human dignity. The Church teaches that “the seventh commandment forbids acts or enterprises that for any reason—selfish or ideological, commercial, or totalitarian—lead to the enslavement of human beings, to their being bought, sold and exchanged like merchandise, in disregard for their personal dignity.” This clear moral teaching underpins CSNSW’s rejection of exploitation in all its forms and guides our approach to responsible governance, ethical procurement, and due diligence.

In proclaiming the Jubilee of 2025, Pope Francis reminded the Church and the world that hope must be placed at the centre of our response to human suffering. This hope, he has said, “is born of love”—a love that calls us not only to compassion, but to responsibility. Hope demands action: to see injustice clearly, to challenge indifference, and to act decisively where exploitation persists.

Pope Benedict XVI’s reflection on St Josephine Bakhita offers a powerful witness in this regard. Enslaved from childhood and later freed, St Bakhita discovered a hope born of an encounter with Christ—a hope that redeemed her suffering and transformed her life. As Pope Benedict observed, this hope could not be kept to herself: it had to be shared. In educating, equipping, and supporting our staff and partners to recognise and address modern slavery risks, CSNSW continues this mission of transforming awareness into action and action into hope.

This 2025 Modern Slavery Statement reflects CSNSW’s ongoing commitment to continuous improvement. During the year, we have continued our due diligence processes, training and awareness initiatives, and further embedded modern slavery considerations into our governance and procurement frameworks. The establishment and active operation of the Modern Slavery Working Group has enhanced cross organisational oversight and thereby ensured that modern slavery risks remain visible, understood, and actively managed.

We recognise that modern slavery is a complex and global challenge that cannot be addressed by policy alone. Meaningful progress requires sustained attention, honest reflection, and a willingness to continually improve our practices.

CSNSW recommits itself to ensuring that our decisions, relationships, and operations reflect the hope we profess—a hope grounded in love, strengthened by justice, and directed toward the protection of the dignity of every human person.



Emeritus Professor Toni Downes



Principal Governing Body Approval

This Sixth Modern Slavery Statement was approved by the Board which is the principal governing body of CSNSW as defined by the *Modern Slavery Act 2018* (Cth) ('the Act') on 23 April 2026. This Modern Slavery Statement is signed by the Interim Chair as the responsible member of Catholic Schools NSW as defined by the Act.



The Spirit of the Lord is upon me, because he has anointed me to bring good news to the poor. He has sent me to proclaim release to the captives (Lk 4:18)



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Criteria 1: About Catholic Schools NSW

CSNSW is the peak body responsible for supporting Catholic Schools across New South Wales (NSW). Established in 2017 as a company limited by guarantee, the Company's Members comprise the eleven diocesan bishops across NSW.

Our purpose and mission

At its core, CSNSW exists to serve the mission of the Church and support Catholic education in advancing high quality learning and strong faith formation for every student.

CSNSW neither owns nor operates schools. Instead, it acts as a central coordinating and leadership body, working closely with diocesan school authorities and religious institute/ministerial PJP school authorities to support operational excellence, uphold regulatory obligations, and advance the mission of Catholic education in Australia.

Our values as enablers

CSNSW's values, **Integrity, Service, Accountability and Collegiality**, underpin all work combatting modern slavery from governance to supplier engagement and training.

These values are visible in **Figure A**.

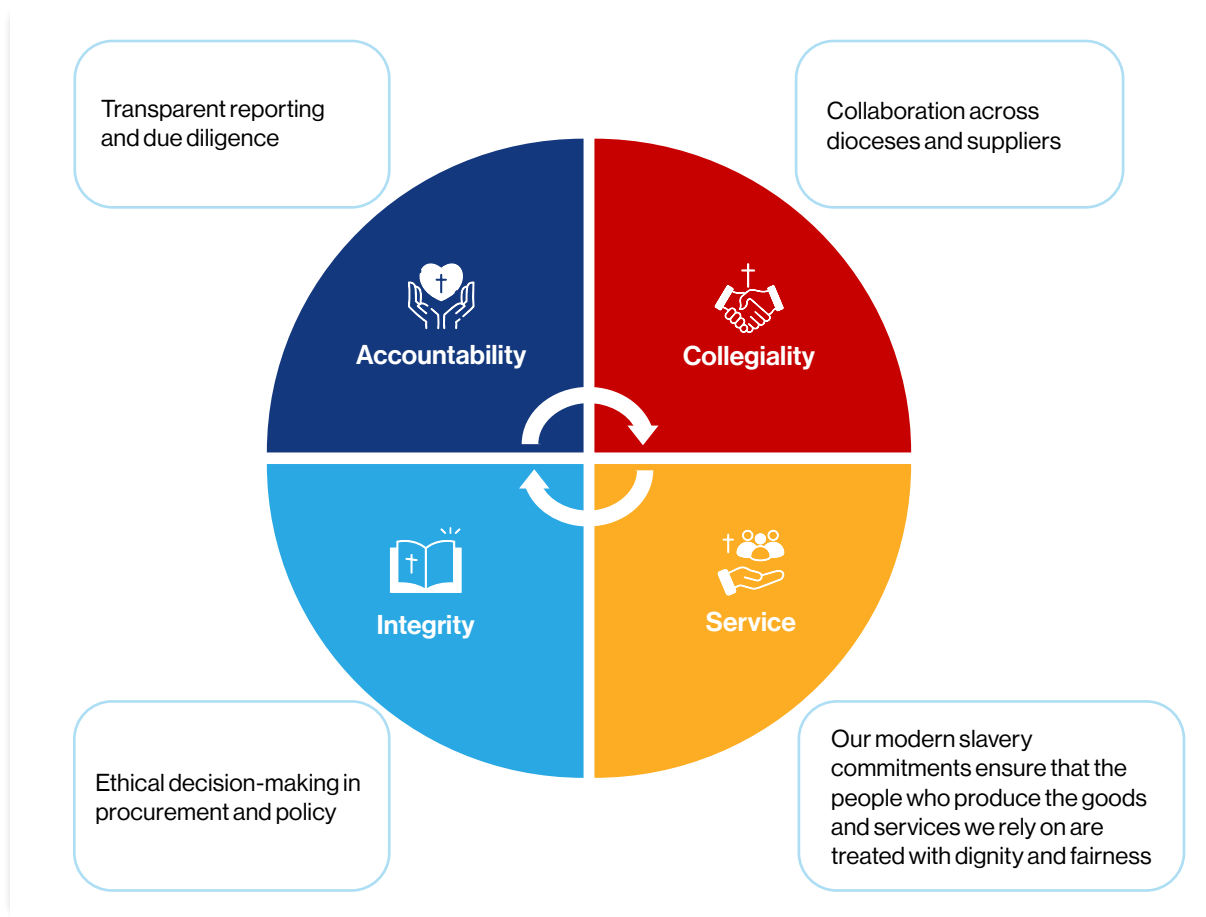


Figure A: CSNSW Values

CSNSW's Modern Slavery Program is one of the strongest operational expressions of these values. The actions carried out under the Program reflect CSNSW's mission to advance God's work through leadership and service, ensuring that CSNSW's influence extends beyond Catholic school communities to safeguard the rights and wellbeing of workers across the company's broader operations and supply chain.

These values shape the company's culture and reinforce its commitment to ethical practice, responsible stewardship, and respect for human dignity, including in the way the company manages the risks of modern slavery.

Our key roles and responsibilities

Guided by the Bishop Members, CSNSW carries responsibilities that position it as the primary interface between Catholic education and government across NSW. These include acting as:

- Approved System Authority for the distribution of over \$3 billion in recurrent government funding each year;
- Catholic Block Grant Authority (CBGA) for Commonwealth and NSW capital funding;
- Designated Non Government Representative Body (NGRB) for Catholic schools in NSW;
- Peak advocate for Catholic education to government, regulators, and the public;
- Single approved registration authority for systemic Catholic schools in NSW;
- Provider of sporting pathways through CSNSW Sport Services;
- Developer and distributor of high quality trial Higher School Certificate (HSC) examinations via Catholic Secondary Schools Association (CSSA).



How we support the sector

CSNSW exercises a broad leadership, policy, and compliance function through several core activity areas as detailed in **Figure B**.

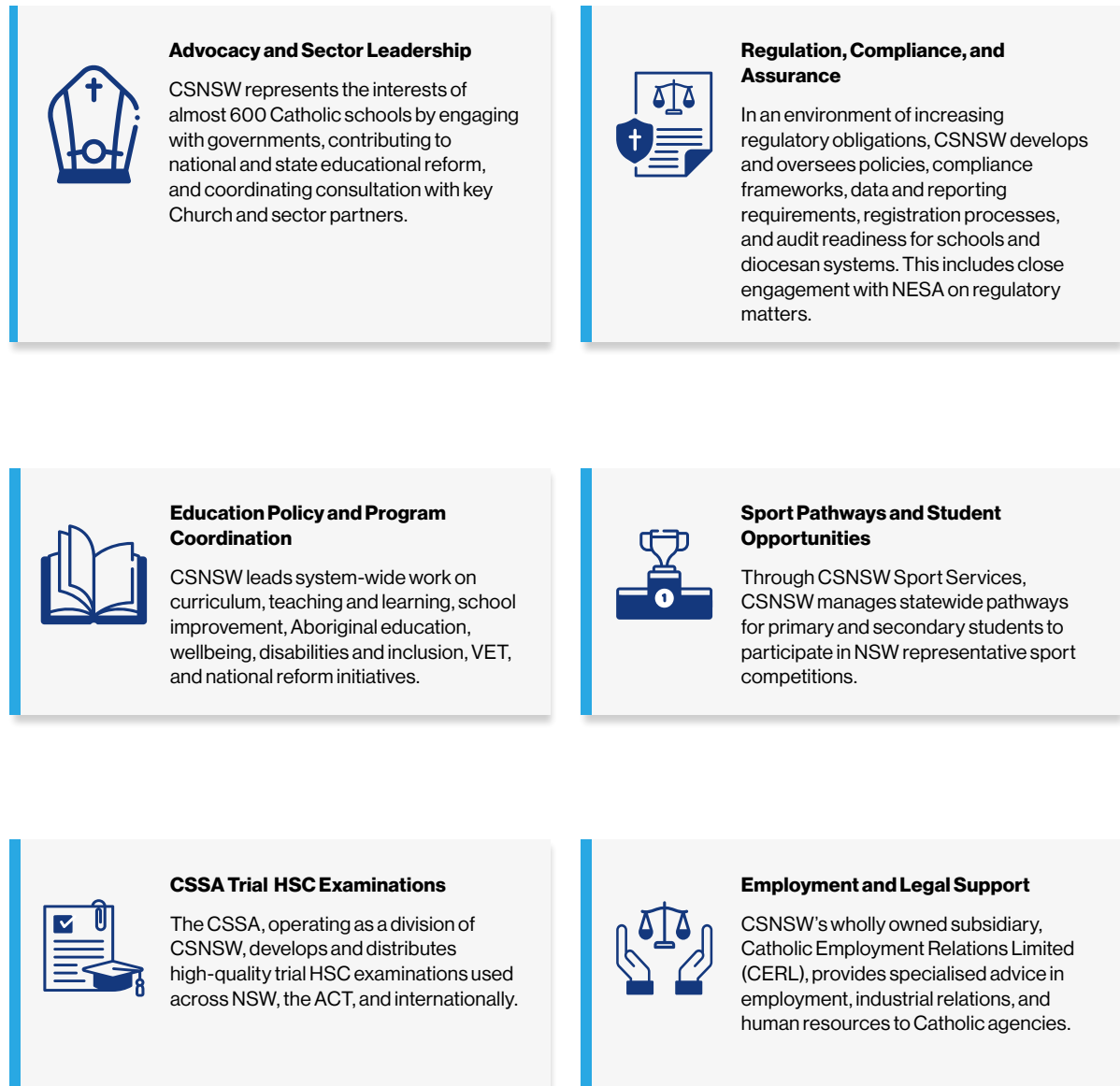


Figure B: Support CSNSW Provides to the Catholic Sector

Criteria 2:

Our Structure, Operations and Supply Chains

Embedding Continuous Improvement to Advance the CSNSW Strategic Vision

Our structure and operations

CSNSW is a not for profit company limited by guarantee, incorporated and domiciled in Australia. Its members comprise the nine diocesan Bishops of NSW, the Archbishop of Sydney and the Archbishop of Canberra and Goulburn (Bishop Members). CSNSW's authority and remit are derived from the company Constitution and the Bishop Members' Canonical Mandate.

As of 31 December 2025, CSNSW employed a predominantly full time workforce. In 2023, CSNSW relocated its head office to Angel Place, 123 Pitt St, Sydney, to better support organisational growth. CSNSW's 2025 consolidated revenue was reported as \$42,873,418.

Catholic Employment Relations Limited (CERL), established on 12 August 2020, is a wholly owned subsidiary and operates from the CSNSW Angel Place offices.

This structural model illustrated in **Figure C**, positions CSNSW to advance its long term strategic vision—ensuring governance, operations, and service delivery are continually refined to meet emerging needs across Catholic education in NSW.

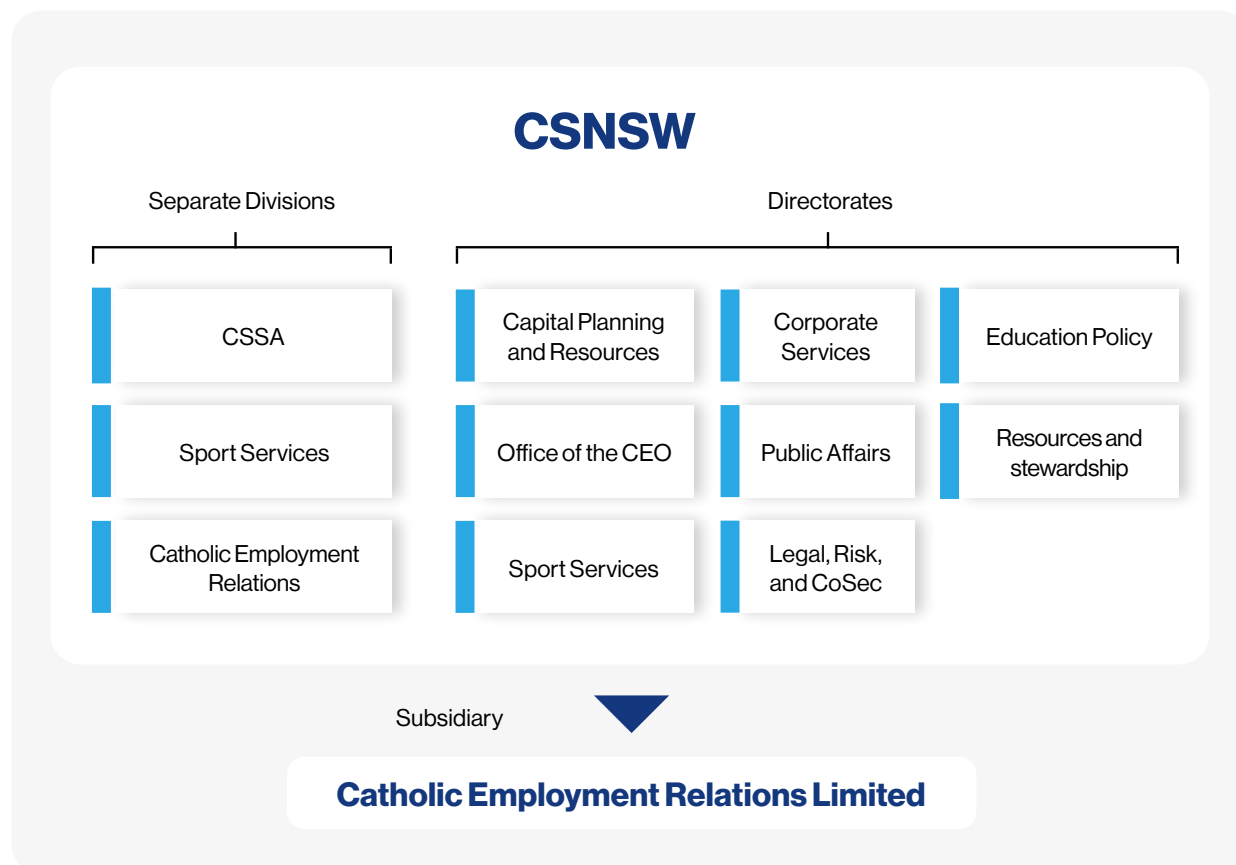


Figure C: CSNSW Organisational Chart



Board of Directors

CSNSW is governed by a Board comprising directors with diverse expertise across education, governance, Church leadership, and industry.

In 2025, the CSNSW Board comprised ten Directors, including the Chair. The Board brings diverse expertise and provides informed, forward looking decision making and oversight.

To fulfil its responsibilities and drive strategic oversight, the Board is supported by six committees, each operating under its own charter:

- Audit and Risk Committee (ARC)
- Capital Projects Evaluation Panel (CPEP)
- Catholic Education 2030 Committee (2030)
- Compliance and Resourcing Committee (CRC)
- Inter Diocesan Registration and Accreditation Committee (IDRAC)
- Nomination, Succession and Remuneration Committee (NSRC)



Mark Dorney
KMG (Ob) (Chair)



Anna Dickinson



The Most Rev
Danny Meagher



John Perrottet



Gráinne McCormack



Jenny Allen



Julian Widdup



The Hon. Michael Lee



Emeritus Professor
Toni Downes



Craig McGrory

Board Committees



* Merger of Executive Committee and Governance, Remuneration and HR Committees

Catholic Employment Relations

Catholic Employment Relations (CER), a division of CSNSW, is the bargaining representative for the NSW and ACT Catholic Systemic Schools enterprise agreements covering teachers, general employees and principals. CERL is a professional, service-based legal practice that provides advice on Australian law, employment relations, industrial relations, and human resources to Catholic agencies including Catholic Independent Schools (non-systemic), other Catholic education entities outside NSW systemic education, and non-education clients. CERL is a subsidiary of CSNSW and an incorporated legal practice within the meaning of the NSW Legal Profession General Uniform Rules 2015.



Management Team

The Management Team leads the organisation's work program, guiding policy development, operational effectiveness, and service delivery across the Catholic education network. Its remit includes:

- Delivering the Board approved strategic and operational program;
- Providing policy expertise in funding, curriculum, regulation, and teacher accreditation;
- Leading the CSSA Trial HSC Examinations program;
- Managing the receipt and distribution of Commonwealth and state recurrent and capital funding;
- Ensuring compliance with legislative and program specific requirements;
- Reporting on effectiveness and efficiency in Catholic education delivery;
- Offering sporting pathways through CSNSW Sport;
- Managing capital grants via the CBGA; and
- Strengthening collaboration across dioceses and Member RI/MPJP schools.



Dallas McInerney,
Chief Executive Officer



Marita Winters,
Deputy Chief Executive Officer



Monica Assaf,
Chief Legal and Risk Officer



Jere Gasparov,
Chief Operating Officer



Peter Yates,
Director,
Resources and Stewardship



Kevin Morrison,
Director,
Capital Planning and Resources



Robert Rush,
Director,
Sport Services



Joseph Watson,
Director,
Public Affairs

Governance, leadership and culture

CSNSW's governance, leadership, and culture underpin its capacity to deliver on its mission and long term strategic goals. The Board remains ultimately accountable for organisational governance and ensures that ethical practice, transparency, and continuous improvement guide decision making.

CSNSW utilises a SaaS enabled Governance, Risk and Compliance (GRC) platform to support obligations in a highly regulated environment. This system contributes to the organisation's continuous improvement by streamlining oversight, increasing visibility, and strengthening reporting and accountability.



Our operations and supply chain

CSNSW's operational and procurement practices remain broadly stable from year-to-year, encompassing everything from occasional, low value purchases with non contracted suppliers to long term strategic engagements governed by formal agreements. This consistency provides a clear foundation for strengthening our due diligence processes and monitoring emerging risks across our supply chain.

A significant proportion of CSNSW's expenditure is directed toward low-risk suppliers providing professional services, including research, consultancy, licensing, and membership arrangements, which collectively account for 77% of total supplier spend.

While the majority of these low-risk suppliers are based in Australia, their risk classification relates to the nature of the professional services provided rather than their geographical location.

Despite this, CSNSW maintains awareness that modern slavery risks can still arise within Australian operations and may be present deeper within the extended supply chains of our suppliers.

We recognise that even when engaging locally, goods and services may originate from or be influenced by offshore environments where risk factors are more pronounced. This understanding reinforces our commitment to improving visibility, strengthening supplier engagement, and enhancing procurement practices over time.

Our Risk Management Framework

CSNSW is committed to embedding risk management as a core organisational capability. The Board oversees the risk management framework, ensuring it supports both CSNSW's strategic objectives and day to day operations.

The framework promotes a systematic approach to identifying, analysing, mitigating, and reporting risks. The Management Team oversees operational risk management, supported by the Modern Slavery Liaison Officer (MSLO) and Modern Slavery Working Group (MSWG).

Continuous improvement is embedded through regular review of policies and procedures and the risk management framework, ensuring the framework evolves in step with strategic priorities and emerging risks.

CERL's risk management framework operates in alignment with the broader CSNSW framework, ensuring consistency, accountability, and effective oversight. The Managing Principal is responsible for the day to day implementation of risk management practices, ensuring risks are identified, managed, and escalated appropriately. Oversight is provided by the CERL Board, which reviews risk exposures and controls to ensure they remain within appetite. This governance structure ensures risk management at CERL is embedded, proportionate, and well integrated with CSNSW's enterprise wide approach.

How modern slavery risk management aligns with CSNSW's strategic plan

Modern slavery risk management is not a standalone compliance task, it aligns naturally and directly with several of CSNSW's 2026–2030 strategic priorities and values.

Figure D shows how modern slavery risk management aligns with and strengthens CSNSW's strategic priorities.

CSNSW Strategic Plan: *Towards 2030*

Strategic Priorities

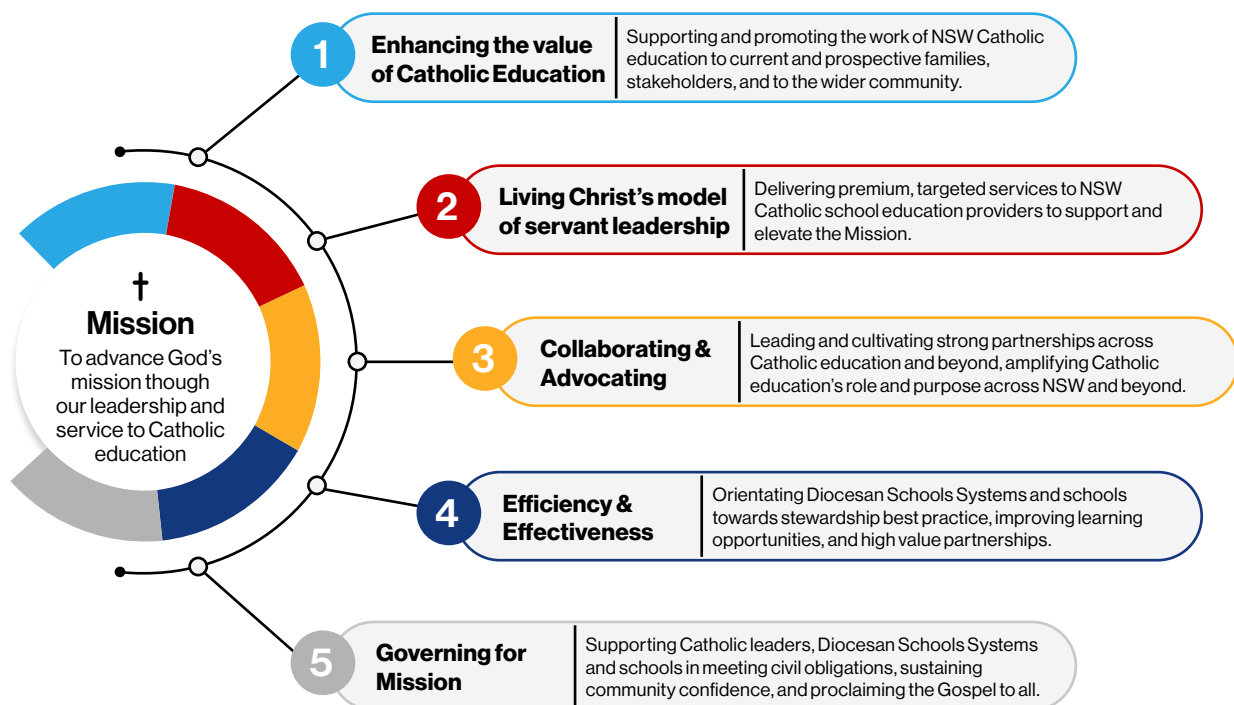


Figure D: CSNSW Strategic Plan: *Towards 2030*

Table A details how CSNSW's modern slavery initiatives support the strategic priorities.

1 Enhancing the value of Catholic Education	
Priority 1	Focuses on enhancing the value and strengthening the reputation and distinctiveness of Catholic education. CSNSW's modern slavery initiatives contribute to this strategic priority by: • Demonstrating that CSNSW not only meets but exceeds ethical expectations. • Expanding awareness among families, stakeholders, and the public that CSNSW's approach is anchored in justice, integrity, and care for the vulnerable. • Reinforcing Catholic identity and moral leadership in practical, measurable ways.
Strategic impact	Ethical stewardship and human dignity strengthen the value proposition of Catholic schooling and reinforce its mission.
2 Living Christ's model of servant leadership	
Priority 2	Emphasises delivering targeted services that elevate mission and embody servant leadership. CSNSW's modern slavery initiatives contribute to this strategic priority by: • Demonstrating a commitment to protecting the vulnerable, which is a central teaching of Catholic Social Teaching on human dignity and justice. • Providing tools, guidance, and training to staff and stakeholders, modelling leadership in ethical practice. • Raising awareness of modern slavery risks within Catholic communities and suppliers.
Strategic impact	By actively combatting modern slavery, CSNSW lives out a tangible expression of servant leadership and caring for those most at risk of exploitation.
3 Collaborating & Advocating	
Priority 3	Commits to cultivating strong partnerships and amplifying the role and impact of Catholic education across NSW and beyond. CSNSW's modern slavery initiatives contribute to this strategic priority by: • Working with Australian Catholic Anti-Slavery Network (ACAN), dioceses, RI/MPJPs, government bodies, and suppliers to improve ethical practices across the sector. • Creating shared responsibility and collective impact through supplier engagement, Sedex onboarding, and sector-wide risk remediation. • Advocating for ethical standards which reinforces CSNSW's leadership voice.
Strategic impact	Through shared anti-slavery initiatives, CSNSW strengthens relationships and provides unified sector leadership on a major ethical issue.

Table A: CSNSW's modern slavery initiatives and strategic priorities

4

Efficiency & Effectiveness**Priority 4**

Focuses on best practice stewardship, improving operations, and building high value partnerships.

CSNSW's modern slavery initiatives contribute to this strategic priority by:

- Creating efficient and well-governed procurement systems with supply chain mapping, risk categorisation, supplier audits, and anti slavery contract clauses.
- Applying modern slavery risk management to strengthen CSNSW's ability to choose trusted, compliant, ethical suppliers.
- Participating in ACAN and sharing due diligence tools to create shared efficiencies between Catholic entities.

Strategic impact

Ethical supply chain oversight reinforces sustainable, risk aware stewardship and is core to the 2030 Strategic Plan.

5

Governing for Mission**Priority 5**

Focuses on supporting Catholic leaders and systems to meet civil obligations, sustain community confidence, and proclaim the Gospel.

CSNSW's modern slavery initiatives contribute to this strategic priority by:

- Voluntarily opting into the legislative scheme, which attracts obligations under the Modern Slavery Act 2018 (Cth) and requires transparent governance, due diligence, and ethical stewardship.
- Adopting Modern Slavery frameworks (policy, training, risk assessments, appointment of a MSLO/MSWG) which directly support civil compliance obligations and good governance.
- Implementing ethical procurement and supplier oversight which uphold community trust and the Church's commitment to safeguarding and protecting human dignity.

Strategic impact

CSNSW's credibility as a regulating, funding, and advocacy body depends on visible ethical leadership and rigorous compliance systems.

Table A: CSNSW's modern slavery initiatives and strategic priorities

Reporting Criteria 3: Modern Slavery Risks in Operations and Supply Chain

Operational risks

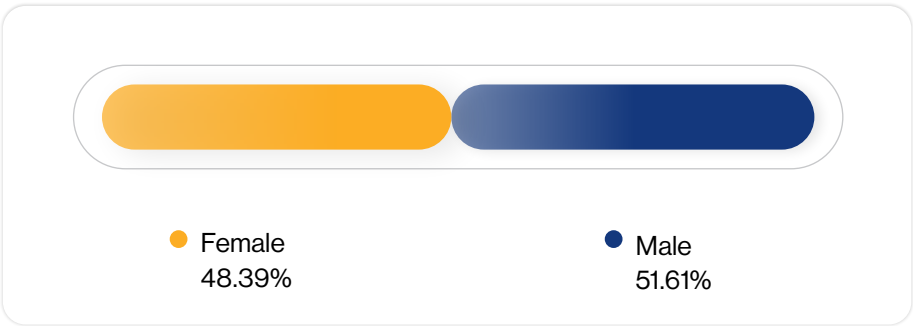
Our people

CSNSW continues to maintain a low risk operational profile, with most of our workforce employed in professional roles in Sydney, Australia. A breakdown of employees by employment type is presented in **Table B**.

Employee breakdown				
	Full time	Part time	Total Full Time Equivalent (FTE)	Total Headcount
Employee Status	75	6.9	81.9	87

Table B: Employee Breakdown

A breakdown of employee type by gender is set out in **Graph A**.



Graph A: Gender Profile of Employees

To ensure compliance with labour, employment and immigration requirements, CSNSW employs a full time Human Resources Manager and maintains a comprehensive suite of HR policies. CERL also provides professional legal, HR, employment, and industrial relations advice as required.

Frameworks and policies supporting modern slavery risk management

CSNSW's commitment to responsible, ethical and legally compliant operations is underpinned by a wide range of frameworks and policies. These policies reinforce strong governance, transparent practices, safe working environments, and responsible supplier management.

Table C provides an overview of CSNSW's policies relating to core governance, ethical conduct and risk management and their purpose to support the combat of modern slavery.

Policy	Purpose
Risk Management Policy & Program	Defines our structured approach to identifying, assessing, and managing organisational risks, forming the foundation for modern slavery risk controls.
Business Continuity Policy	Ensures CSNSW can maintain critical functions during disruptions, supporting resilience across operations and suppliers.
Fraud and Corruption Control Policy	Helps prevent, detect, and manage fraud and corruption risks, which often intersect with modern slavery vulnerabilities.
Whistleblower Policy/ Whistleblower Program	Enables confidential reporting of concerns, including unethical behaviour and issues related to modern slavery.
Conflicts of Interest Policy	Ensures transparency and impartial decision making across procurement and supplier engagement.
Delegations Policy	Clarifies decision making authority, strengthening oversight and accountability.
Policy Development Framework & Procedures	Ensures consistent formation, review, and approval of policies, including those linked to modern slavery.

Table C: CSNSW Policies

Table D details CSNSW policies that deal with workplace standards, employee conduct and safety requirements and the intent for each policy.

Policy	Purpose
Employee Handbook, including Code of Conduct	Sets behavioural and ethical expectations for all staff.
Work Health & Safety Policy and Procedures	Ensures safe and lawful working conditions for all workers and contractors.
Flexible Work Arrangements Policy & Procedures	Supports fair working practices and equitable workplace arrangements.
Child Safe Policy and Code of Conduct	Embeds a culture of child safety and aligns with safeguarding obligations.
Reporting Child Safety Concerns Policy	Provides mandatory reporting pathways for safety concerns involving children.
Statement of Commitment to Child Safety	Affirms CSNSW's commitment to child protection as a core ethical responsibility.
External Complaints Handling Policy and Procedures	Outlines a transparent and fair process for managing external grievances.

Table D: Workplace standards, conduct and safety policies

CSNSW also has policies relating to procurement, supply chain and modern slavery specific instruments, which are covered in **Table E**.

Policy	Purpose
Modern Slavery Policy	Directly guides CSNSW's prevention and management of modern slavery risks.
Model Supplier Code of Conduct	Sets the ethical, labour and human rights standards expected of all suppliers.
Vendor Management Policy	Provides a structured process for selecting, onboarding, evaluating and offboarding suppliers, supporting modern slavery due diligence.
Related Party Transaction Policies	Strengthen transparency and fairness in financial and contractual dealings.

Table E: Procurement, supply chain and modern slavery specific policies.

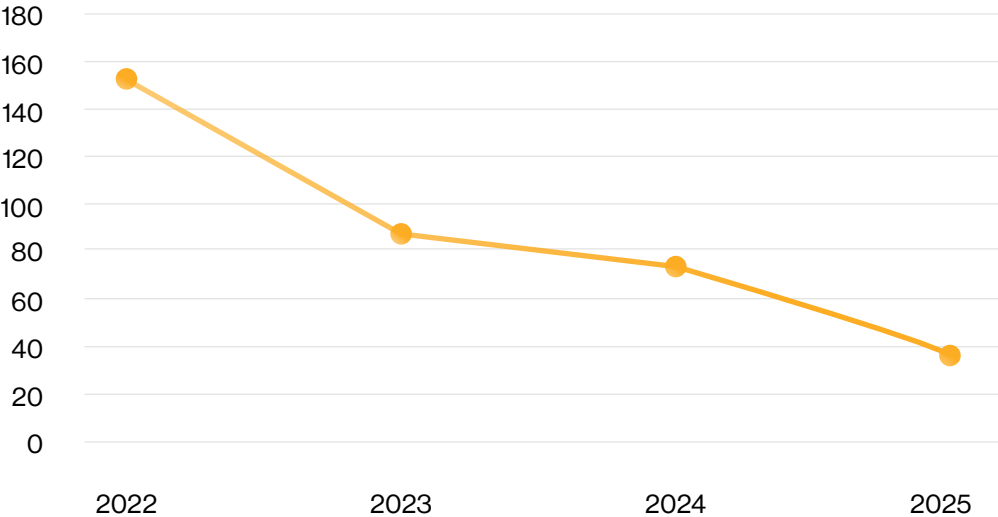
CSNSW’s supply chain is low risk

CSNSW’s overall exposure to modern slavery risk in its operations remains low, given our predominantly Australian professional services supplier base. All suppliers engaged by CSNSW to date have had no reportable concerns.

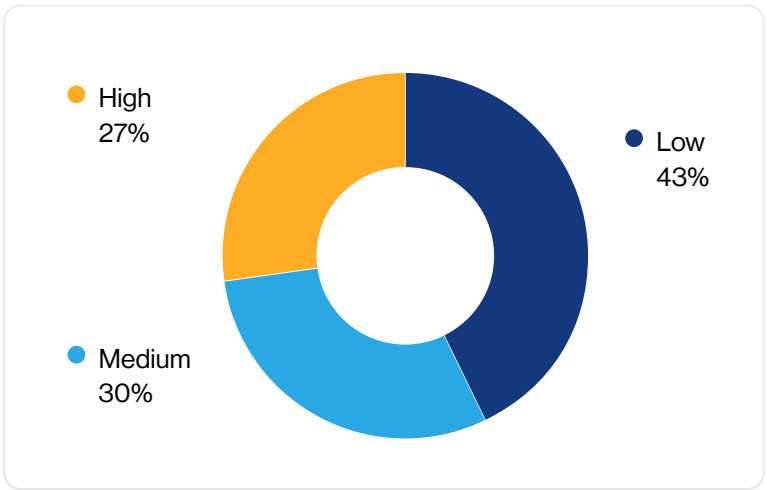
Importantly, our modern slavery risk profile remains consistent year to year, with no material change in supplier risk exposure.

Accompanying **Graphs B and C** set out below display the number of desktop audits conducted and the distribution of audits across higher risk supplier categories.

Modern Slavery Desktop Audits



Graph B: Modern Slavery Desktop Audits



Graph C: Risk Categories

Supply chain risks

CSNSW continues to assess modern slavery risks using the ACAN Category Risk Taxonomy, which is a classification standard that identifies the severity of actual or potential harm to people 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.

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

- Whether the supplier operates in a sector identified as high-risk by Australian or international guidance.
- The presence of goods listed in international high risk commodity reports, including the US Department of Labor's list of goods produced by child or forced labour.
- Country level modern slavery prevalence and government response ratings from the Global Slavery Index.
- Types of labour used in producing goods and services, including sectors reliant on low skilled, vulnerable, migrant, or "3D" (dirty, dull, dangerous) labour.

These categories align with the UN Standard Products and Services Code (UNSPSC), ensuring interoperability with procurement systems used across the Catholic sector.

Consistently with prior years, our suppliers predominantly operate within low risk, professional services industries, resulting in a stable and predictable risk profile.

While we continue to undertake desktop audits for new suppliers and selected suppliers from previous years, the overall number of audits has declined. This reduction reflects the growing consistency of our supplier base, with CSNSW engaging many of the same trusted suppliers from year-to-year. As a result, fewer new suppliers enter our procurement pipeline, reducing the need for repeated initial assessments.

Despite this decline in audit volume, our underlying risk profile has remained largely unchanged from previous years, as our operations and procurement activities continue to draw predominantly from low risk, professional service sectors.

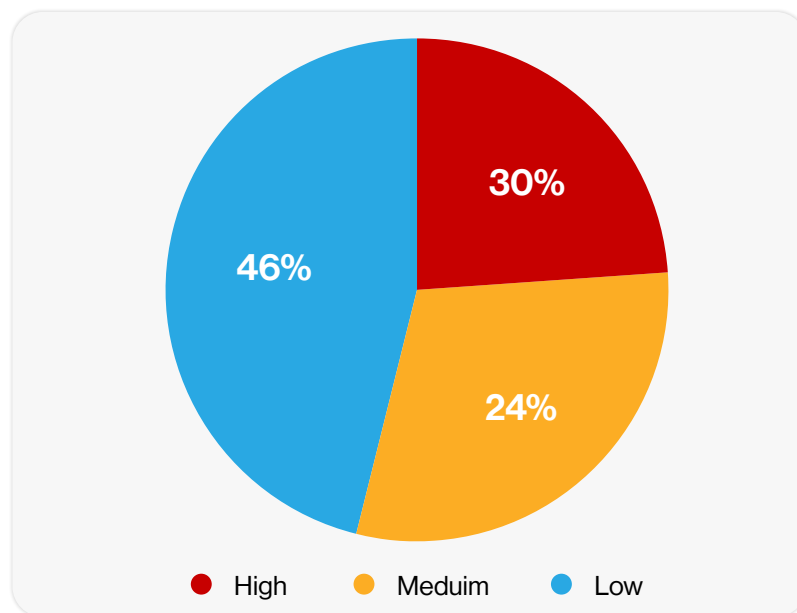


Overview of Supply Chain Risk Distribution

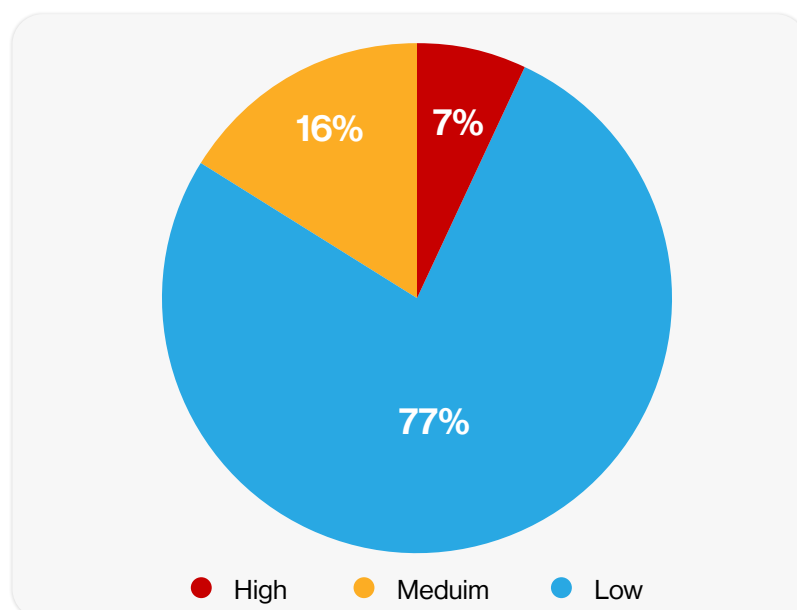
Our review of CSNSW's supplier base shows that most of our procurement activity occurs within low risk categories. When measured by the number of transactions and shown in **Graph D**, 46% of transactions come from low-risk suppliers. 30% of transactions is associated with medium risk suppliers, while high risk suppliers represent 24% of all transactions.

When viewed through the lens of total expenditure, the risk profile remains consistent. As illustrated in **Graph E**, 77% of CSNSW's total spend in 2025 is attributed to low risk supplier categories. Medium risk suppliers account for 16% of total spend, and high risk categories represent 7%.

This demonstrates that both our transactional activity and financial outlays are concentrated among suppliers presenting the lowest inherent modern slavery risk.



Graph D: Modern Slavery Risk Profile as % of Transactions



Graph E: Modern Slavery Suppliers by Risk Profile % Spend

Concentration of Spend in Low Risk Categories

CSNSW's two largest spend categories, professional services and licence/membership fees are classified as low-risk, together representing 74% of total expenditure for 2025. The most significant single category is professional services, which accounts for 49% of all spend and is assessed as low-risk.

This concentration of spend in low risk categories substantially reduces CSNSW's exposure to modern slavery risks and reflects the nature of our operations, which rely predominantly on professional, educational, and knowledge based services rather than goods or services sourced from higher risk geographies or labour intensive industries.

The relatively small proportion of transactions and spend in medium and high risk categories does not diminish our responsibility to manage risk but indicates that our modern slavery exposure is targeted and manageable.

These findings help focus our due diligence efforts on the areas where modern slavery risks are more likely to arise (typically suppliers operating in sectors such as facilities, technology hardware, or other industries known to have higher vulnerability in their upstream supply chains).

How the analysis informs our risk management approach

The statistics we collect support our ongoing commitment to risk based modern slavery governance. Specifically, they allow CSNSW to:

- Prioritise enhanced due diligence for suppliers operating within *medium* and *high risk categories*.
- Continue strengthening supplier engagement, particularly where visibility into labour practices may be limited.
- Allocate resources proportionately, ensuring that attention is focused where potential modern slavery risks are most likely to be present.
- Validate CSNSW's procurement patterns which are dominated by low risk professional services and are consistent with our risk tolerance and ethical sourcing expectations.



Reporting Criteria 4:

Actions Taken to Assess and Address Risk

CSNSW continues to take a proactive and ethically grounded approach to identifying, assessing, addressing and mitigating modern slavery risks. Our actions focus on strengthening policies, procedures, due diligence processes, supply chain transparency, training and awareness.

Our commitment is guided by our Modern Slavery Policy, endorsed by the Board and Leadership Team, and reflects CSNSW's ongoing mission to uphold human dignity, ethical stewardship, and the wellbeing of all people who may be at risk of exploitation. CSNSW's modern slavery risk management program is aligned with Catholic principles and responsible governance.

Initiatives undertaken

CSNSW undertakes continuous and repeatable actions each year as part of our business as usual modern slavery risk management program.

Key initiatives undertaken in the reporting period, including actions continued from previous years are included in **Table F**.

Key Initiatives	Actions
Modern Slavery Working Group (MSWG)	Established in 2024 and the group met twice in 2025 to oversee implementation, priority setting, and monitoring of actions.
Modern Slavery Policy Implementation	Ongoing adherence to the policy, which outlines CSNSW's commitment to prevent and manage modern slavery risks across operations, business partnerships, and supply chains.
Communication & Awareness	Continued communication of the policy and related program initiatives to employees and business partners.
Finance System Upgrade	Automation of supplier spend categorisation and modern slavery risk taxonomy for major suppliers.
Risk Assessment & Controls	Continued assessment of modern slavery risks across operations and supply chains.
Anti Slavery Requirements in Procurement	Integration of anti slavery clauses into relevant tenders and high-risk contract documents.
Supplier Due Diligence	Ongoing review of suppliers and business partners, with a requirement that suppliers maintain their own modern slavery risk management systems.
Training & Education	Raising employee and stakeholder awareness to support individual responsibility in identifying and reporting modern slavery concerns.
Access to Remediation (Domus 8.7)	Continued access to an independent program delivering remedies for workers impacted by modern slavery.
Membership of ACAN	Continued participation in ACAN's Modern Slavery Risk Management Program.
Supplier Risk Analysis & Engagement via ACAN	Identification of common suppliers, supplier risk assessments, due diligence, and engagement activities undertaken collaboratively through ACAN.

Table F: Key Initiatives and actions taken for Modern Slavery in 2025

Supplier Engagement

Through the ACAN Modern Slavery Risk Management Program, CSNSW receives supplier engagement support and access to shared data to strengthen supply chain visibility and risk identification.

In 2025, ACAN launched ROTA, a purpose built platform that centralises risk data and supports supplier engagement. Through ROTA and ACAN, CSNSW benefits from:

- ACAN Modern Slavery Risk Taxonomy for evaluating operational and supply chain risks.
- ACAN Supplier Survey capturing supplier workforce characteristics, overseas sourcing, and Sedex membership.
- Supplier Education in key high risk sectors (e.g., labour hire, construction, cleaning, overseas goods sourcing).
- Onboarding of Suppliers to Sedex including verification of business details and services.
- Sedex Self Assessment Questionnaires (SAQ) supporting supplier self evaluation and continuous improvement.
- Desktop Reviews identifying actions required from suppliers.
- Enhanced Screening via KYC Software for additional assurance.
- Corporate Social Compliance Audits providing independent verification of worker protection and legal compliance.
- Domus 8.7 Statement Assessments of selected high risk suppliers.
- ACAN Prequalified Supplier Directory enabling access to vetted, ethically aligned suppliers.



Supplier Risk Identification

Consistent with previous years, CSNSW's procurement profile continues to focus predominantly on professional services and licence/membership fees. A risk based approach is applied by categorising suppliers into high, medium and low risk tiers.

In 2025, CSNSW continued to use ACAN's 23 category risk taxonomy, informed by recognised global data sources such as the Global Slavery Index (2023), Global Estimates of Forced Labour (2022), Global Rights Index (2024), ILAB, and the US State Department Trafficking in Persons Report.

Risks are assessed using four key factors shown in **Figure E**.

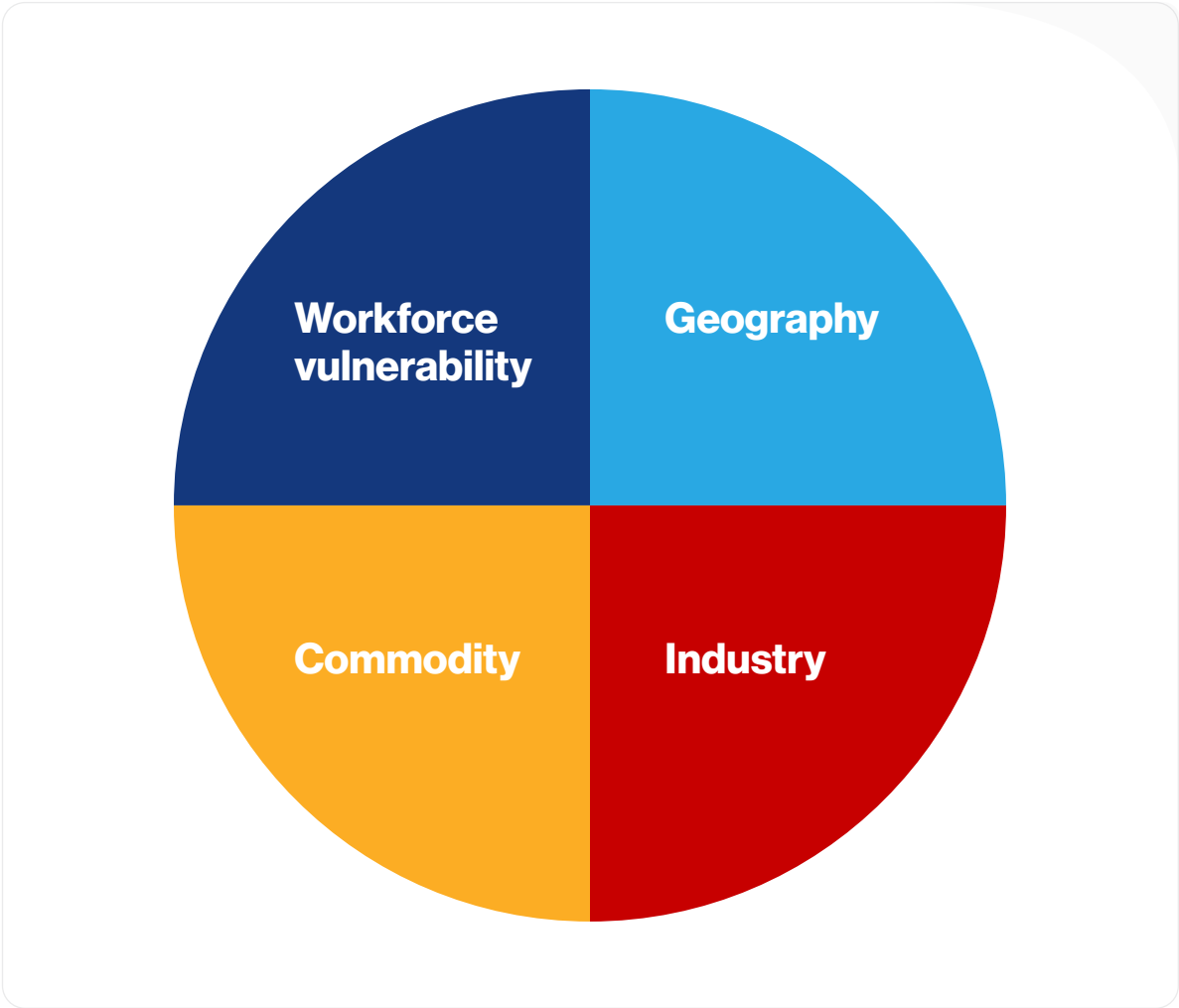


Figure E: Key Risk Factors

Addressing high and medium risk suppliers

For medium and high risk suppliers, CSNSW undertakes a structured due diligence process including:

- Desktop audits;
- Supplier questionnaires;
- Use of standardised Anti-Slavery Contractual terms; and
- Recording all findings in the CSNSW desktop audit supplier register.

Contract management

CSNSW uses a GRC system to record, monitor and track contract compliance.

Anti-slavery clauses in contracts

All new supplier contracts are reviewed by CSNSW's in house legal team who ensures modern slavery clauses are included wherever necessary, particularly for higher-risk engagements.

To date, CSNSW has not received any reports of modern slavery practices from suppliers.

NSW Catholic Block Grant Authority modern slavery requirements

As part of its administration of the NSW Catholic Block Grant Authority (CBGA), CSNSW has formalised modern slavery compliance requirements of the capital funding process.

Both Initial and Final Offers issued to school authorities now explicitly mandate the inclusion of modern slavery provisions in all contracts associated with CBGA funded capital works.

These measures ensure that each CBGA supported project upholds ethical labour standards, applies due diligence across supply chains, and aligns with CSNSW's broader commitment to safeguarding human dignity in all procurement and project delivery activities.



Model supplier code of conduct

CSNSW's Model Supplier Code of Conduct requires suppliers to:

- Not cause or contribute to modern slavery;
- Proactively identify and eliminate modern slavery risks;
- Conduct due diligence across their own supply chains; and
- Comply with all relevant laws, regulations and anti slavery frameworks.

Modern slavery working group

The MSWG, established in 2024, meets twice annually to:

- Provide input and advice to CSNSW on issues related to modern slavery;
- Provide expert advice;
- Support implementation of the CSNSW modern slavery action plan;
- Establish annual goals and priorities;
- Monitor effectiveness of actions taken; and
- Ensure CSNSW meets all legislative requirements.

Training

- On induction, all employees are required to complete mandatory modern slavery training comprising of three modules;
- New employees must complete the training within 30 days; and
- Suppliers and stakeholders may access ACAN's e-learning resources via Domus 8.7.

Board commitment

The Board approves CSNSW's annual Modern Slavery Statement and maintains full commitment to eliminating modern slavery risks across operations and supply chains.

Membership of ACAN

CSNSW continues to participate in and benefit from the ACAN Modern Slavery Risk Management Program.

Remediation

Through ACAN, CSNSW has access to Domus 8.7, which provides:

- A 24/7 Worker Careline;
- An online grievance mechanism;
- Outreach materials; and
- Independent remediation pathways for affected workers.

Reporting Criteria 5: Effectiveness assessment

CSNSW evaluates the effectiveness of its modern slavery risk management activities through ongoing monitoring, structured governance processes and supplier engagement.

While CSNSW continues to strengthen its foundations each year, the overall profile of key activities and outcomes, shown in **Table G**, has remained relatively consistent, reflecting the maturity and stability of CSNSW's existing controls rather than significant year on year operational change.

Modern Slavery Summary of Key Activities

	Activity	2025
Internal / Staff	Hours spent on modern slavery activities (including training and staff awareness initiatives)	350
	E-learning modules completed	On induction by all staff
External / Supplier Engagement	Number of suppliers	449
	Number of suppliers across high-risk categories	97
	High-risk suppliers as a percentage of spend	7%
	Number of ACAN Supplier Surveys completed in 2025	99
	Number of suppliers identified for Sedex onboarding in 2025	21
	Number of Suppliers who have completed e-learning	17
	Number of non-conformances in 2025	0
Domus 8.7 External Referrals	Contacts made via worker voice / grievance mechanism	0
	Referrals for advice and assistance	0
	Individuals identified or referred for modern slavery assessment	0
	Individuals with modern slavery cases remediated	0

Table G: Key Activities

Continuous improvement

Continuous improvement remains central to CSNSW's approach, supporting the proactive strengthening of systems before risks materialise.

Activities undertaken during the reporting period include:

- Ongoing monitoring of compliance tasks through the internal assurance program;
- Mandatory modern slavery awareness training assigned to all new employees during induction;
- Review of all contracts and agreements by CSNSW's in house legal team prior to execution, with continued rollout of modern slavery clauses based on risk; and
- Continued engagement and monitoring of suppliers, supported by the CSNSW Model Supplier Code of Conduct and Modern Slavery Policy.

Summary

Overall, CSNSW's effectiveness in addressing modern slavery risks has remained steady, with limited change compared with previous years. This stability reflects the consolidation of strong foundational processes, including supplier screening, contractual controls, staff training, and governance oversight that continue to function as intended.

While there were no identified cases, referrals, or non conformances during the reporting year, CSNSW recognises that absence of detected issues does not equate to absence of risk. CSNSW remains committed to continuously improving its approach, focusing on enhanced supplier engagement, increased data visibility, and strengthened accountability mechanisms to ensure robust and evolving responses to modern slavery risks in future reporting cycles.



Reporting Criteria 6: Process of Consultation with Entities Owned or Controlled

This Statement includes CERL.

CSNSW's policies and procedures apply across both entities and CSNSW's MSLO acts in a combined role.

During the reporting period this statement covers, CSNSW actively engaged and consulted with all employees of CERL. The employees of CERL undertake the same modern slavery mandatory training as CSNSW employees and CSNSW will continue to prepare an annual statement for both entities.



Reporting Criteria 7: Other Relevant Information

CSNSW has reviewed its activities for the 2025 reporting period and has not identified any additional relevant information to disclose under Reporting Criteria 7.



Appendix A: Glossary of Acronyms

ACAN	Australian Catholic Anti Slavery Network
ARC	Audit and Risk Committee
CBGA	Catholic Block Grant Authority
CER	Catholic Employment Relations
CERL	Catholic Employment Relations Ltd
CPEP	Capital Projects Evaluation Panel
CRC	Compliance and Resourcing Committee
CSNSW	Catholic Schools NSW
CSSA	Catholic Secondary Schools Association
GRC	Governance, Risk and Compliance
HSC	Higher School Certificate
IDRAC	Inter-Diocesan Registration and Accreditation Committee
ILAB	Bureau of International Labor Affairs
ILO	International Labor Organisation
MSLO	Modern Slavery Liaison Officer
MSWG	Modern Slavery Working Group
NGRB	Designated Non-Government Representative Body
NSRC	Nomination, Succession and Remuneration Committee
RI/MPJP	Religious Institutes/Ministerial Public Juridical Persons
SAQ	Sedex Self-Assessment Questionnaires
UNICEF	United Nations Children's Fund
UNSPSC	UN Standard Products and Services Code



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