Modern Slavery Statement

1 January–31 December 2024

Victorian **Catholic Education** Authority

In the spirit of reconciliation, VCEA acknowledges Aboriginal and Torres Strait Islander people as the traditional custodians of the land and pays respect to their Elders past and present.

Victorian Catholic Education Authority Limited (VCEA)

ABN: 92 119 459 853

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This Modern Slavery Statement (**Statement**) has been made on behalf of Victorian Catholic Education Authority Limited (**VCEA**) ABN 92 119 459 853. The Statement has been prepared pursuant to sections 6 and 13 of the Modern Slavery Act 2018 (Cth) (the Act) and covers VCEA as a single reporting entity.

This Statement sets out the progress that VCEA has made towards identifying, assessing and addressing modern slavery risks during the 2024 reporting period, during a period of significant organisational transformation. This is VCEA's second statement in its restructured form.

This Modern Slavery Statement was approved by the Board, which is the principal governing body of Victorian Catholic Education Authority Limited as defined by the Modern Slavery Act 2018 (Cth) (the Act) on 26 May 2025.

This Modern Slavery Statement is signed by the Chair as the responsible member of Victorian Catholic Education Authority Limited as defined by the Act.

James Merlino
Chair
26 May 2025

Criteria 1
About the Victorian Catholic Education Authority Limited (VCEA)

VCEA is the peak body for Catholic school education in Victoria. VCEA exists to advance the mission of Catholic school education in the State of Victoria, in the service of students, families and the broader community.

Through the delivery of its stated Objects, VCEA will advance a Catholic vision of education where every student's life is understood as a gift. Each student in a Catholic school throughout Victoria will be afforded every opportunity to come to the fullness of life. VCEA will strive for excellence in education through the delivery of responsive and quality educational practices.

Central to VCEA's mission is the advancement of every child throughout their educational journey to allow them to mature in every dimension of their lives through the formation of their intellectual, spiritual, physical, and social capacities. Through the equitable sharing of resources among Catholic educational providers, VCEA's mission is to enable students to flourish, to grow in awareness of their unique gifts and to confidently embrace their future with hope, in faith, and through love. VCEA:

a. seeks to integrate this work of educating with the explicit proclamation of the Gospel of Jesus Christ in fostering communities of learning and teaching, which recognise and nurture the dignity of each person, created in the image of God.
b. strives to ensure that Catholic schooling in Victoria is distinguished by its intellectual, practical, and moral excellence, and fosters a formation of the whole person that is deeply and enduringly humanising.
c. upholds the rights of parents, as the first teachers of their children, to access Catholic schooling which provides a religious and moral formation that is aligned with their conscience and religious faith.
d. promotes the common good in its structures, policies and actions by advocating for appropriate access to, and funding of Catholic schooling in Victoria, and ensuring the just distribution of education resources.

e. recognises the ecclesial identity of each Catholic school, and the bond of communion with its diocese, parish or religious institute that underpins its foundation, and seeks to nurture them by promoting dialogue and cooperation among all Catholic School education providers, Catholic entities, and with the general community.

VCEA works in close collaboration with all incorporated school governing authorities responsible for the operation and governance of Victorian Catholic schools. The Catholic education sector in Victoria comprises approximately 500 schools operated by 33 proprietors.

Schools are located across the four dioceses of the Catholic Church in Victoria – the Archdiocese of Melbourne, the Diocese of Ballarat, the Diocese of Sandhurst and the Dioceses of Sale. The largest proprietors are governing authorities established in each diocese. These companies are;

- Melbourne Archdiocese of Catholic Schools (MACS)
- Diocese of Ballarat Catholic Education Limited (DOBCEL)
- Diocese of Sale Catholic Education Ltd (DOSCEL)
- Catholic Education Sandhurst (CES)

In addition, there are Catholic schools in Victoria governed by Religious Institutes (RI) or Ministerial Public Juridic Persons (MPJP). These are known as RI/MPJP schools. There are 29 RI/MPJP school proprietors operating in Victoria.

Governance structure

Following the adoption of new governance arrangements for VCEA at the Annual General Meeting on 5 December 2023, VCEA undertook a significant refresh of its governance structure, which included the appointment of a skills-based board and new board committees.

Company members

- Most Rev Peter A Comensoli DD Archbishop of Melbourne
- Most Rev Paul Bird CSsR MA DD Bishop of Ballarat
- Most Rev Gregory Bennet MS STL Bishop of Sale
- Most Rev Shane Mackinlay DD Bishop of Sandhurst
- Sr Eileen Ann Daffy rsm

Board

- James Merlino, Chair
- Patricia Cowling, Director (*appointed from 1 March 2024*)
- Lynn Glover, Director
- Brian Loughnane, Director (*appointed from 23 September 2024*)
- Marcelle Mogg, Director (*appointed from 1 March 2024*)
- Damian Murphy, Director
- Chris O'Grady KC, Director (*appointed from 15 May 2024*)

Board Committees

- VCEA Consultation Committee
- Catholic Mission Committee
- Education and Performance Excellence Committee
- Finance, Risk and Audit Committee
- People and Employment Relations Committee
- Review Body and Compliance Committee
- Nominations Committee

Executive Leadership

- Professor Elizabeth Labone, Chief Executive Officer (*appointed from 20 May 2024*)
- Bruce Phillips, Chief Strategy Officer, and Acting Chief Executive Officer (*from 22 January 2024 to 16 May 2024*)
- Jim Miles, former Chief Executive Officer (*resigned as CEO 19 January 2024*)
- Tracey Bannan, Chief Operations Officer
- Chris Ingham, Chief Education and Integrity Officer (*appointed from 23 September 2024*)
- Geoff Bell, Acting Chief Education and Integrity Officer (*from 10 June 2024 to 22 September 2024)*
- Stefanie Veal, Chief Education and Integrity Officer (*appointed from 25 September 2023 to 7 June 2024*)

Services and Functions

VCEA provides services and undertakes various functions for Catholic school proprietors and Catholic schools in Victoria, working in close collaboration with proprietors. The services and functions are set out in VCEA's Constitution and relate to:

- Government funding of Catholic schools
- School registration and compliance
- Enterprise bargaining
- Long service leave
- Representation and advocacy
- Catholic identity
- Research
- State-wide performance of Catholic schools
- Data collection
- State-wide accreditation

Strategy

VCEA developed its inaugural strategic plan in 2024, setting out the organisation's direction, goals, outlining strategies to achieve them and aligning all organisational efforts towards a shared vision. The strategic plan encompasses a roadmap for decision-making and resource allocation for the 5 years ahead.

Criteria 2
Operations, supply chains and organisational structure

Information on the operations of VCEA can be found in the Financial Report included in the VCEA 2024 Annual Report. This document can be found on the VCEA website.

The Annual Report outlines the operations of VCEA throughout 2024 and the initiatives completed throughout the year in line with VCEAs interim strategic plan. The Annual Report will also be available on the Australian Charities and Not-for-profits Commission (ACNC) website.

It is noted that of VCEA's $3.62 billion expenditure for 2024, 99.5% relates to direct distributions of government grants to Catholic schools in Victoria, Catholic school proprietor companies and contributions of central costs such as copyright and technology costs paid on behalf of the schools.

VCEA's operational expenses, excluding depreciation and amortisation, totalled $19.2 million, which accounts for 0.53% of the organisation's total operational expenditure.

NB: Salaries are included in the operational expenses but are not reflected in the supplier data.

Risk Management

VCEA has adopted a strategic, consistent, and structured enterprise-wide approach to risk management to achieve an appropriate balance between realising opportunities and minimising unexpected outcomes.

VCEA views risk management as an integral part of sound management practice and an essential element of good corporate governance and responsible stewardship. It reinforces accountabilities, enhances decision-making and improves outcomes. VCEA recognises that risk arises in all aspects of its operations and at all stages within the life cycle of those operations. This is true of modern slavery risks.

The VCEA Board is accountable for overseeing and monitoring the assessment and management of risk.

In 2024 the Board was supported in its risk management role by the Finance, Risk and Audit Committee (FRAC), which was responsible for the review and endorsement of the Risk Management Framework, Risk Appetite Statement and Risk Management Policy, each of which was approved by the Board during 2024.

The FRAC met six times during 2024. At each meeting it considered the enterprise risk register. The register was developed and refined throughout 2024. It outlines those risks that management identifies as requiring ongoing review due to the level of exposure faced or where the risk is outside of VCEA's risk appetite, which is set annually by the Board.

VCEA's exposure to modern slavery was assessed and considered against VCEA's risk framework in 2024. The exposure to modern slavery risk was found to be within appetite and tolerance and as such, did not trigger an exposure that requires reporting to FRAC at each meeting. Modern slavery exposures and progress against the action plan are reported to FRAC bi-annually.

Organisational Structure and Workforce Profile

As of 31 December 2024, VCEA employed 73 employees, an increase from 45 employees the previous year.

VCEA is committed to nonbiased and ethical recruitment. All hiring processes are conducted through transparent external channels, such as Seek and executive recruitment firms, ensuring fair selection based on standardised position descriptions and key selection criteria.

During 2024, as VCEA experienced substantial growth, external agency staff were engaged to support daily operations. However, as part of VCEA's ethical recruitment strategy, there was a focus on reducing reliance on agency and temporary employees to promote fair and stable employment conditions. By the end of the reporting period, agency staff were fully phased out, with only two contractors remaining, compared to a peak of twelve combined agency and contractor staff earlier in the year and eight during the previous reporting period.

Employees work in the one office location with flexibility to work up to two days remotely per week (pro rata).

Throughout 2024, VCEA also managed a Master Service Agreement (MSA) with Melbourne Archdiocese Catholic Schools Ltd (MACS) for the delivery of key business functions such as accounts payable, payroll, and IT services. VCEA relies on MACS' modern slavery control environment for the delivery of these services to VCEA. MACS operates a mature policy and human resources environment, with a

well-established approach to modern slavery risk management, as evidenced by their 2023 reporting to ACAN (Australian Catholic Anti-Slavery Network).

The VCEA workforce profile and management structure are shown below.

Figure 1.1 Workforce Profile data (as at 31 December 2024)

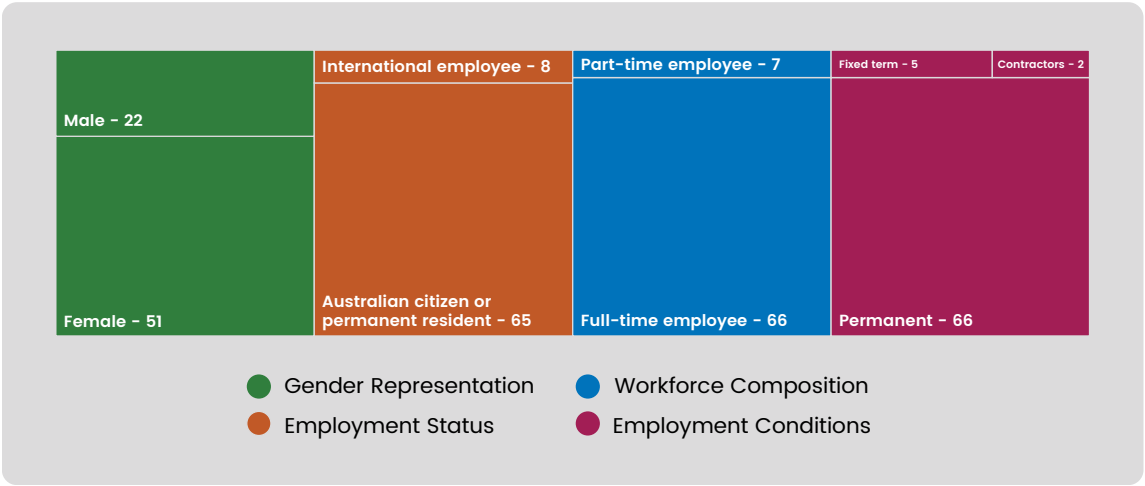
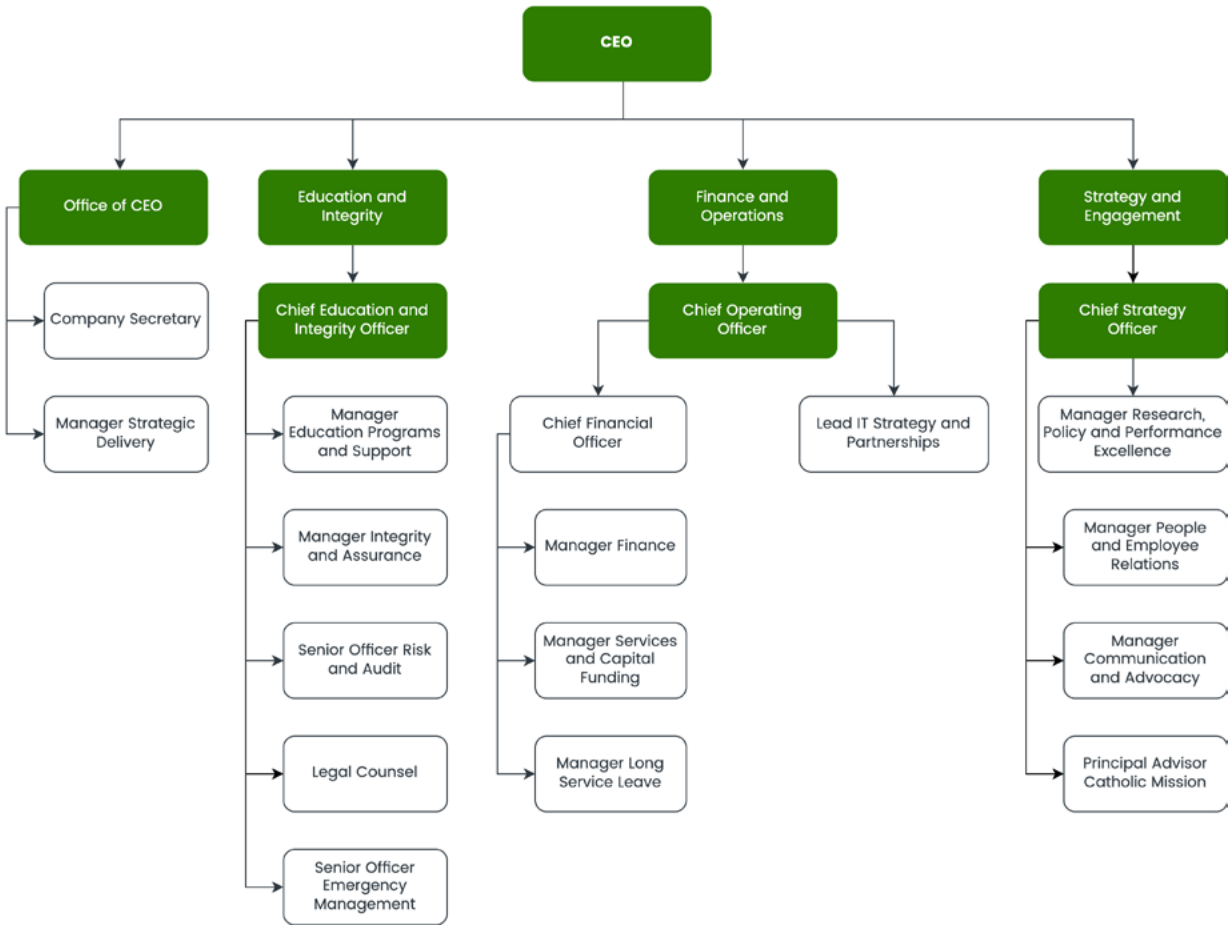


Figure 1.2 Portfolio and Management Structure (as at 31 December 2024)



Summary of 2024 activities

Strategic actions taken by VCEA during 2024 to enhance its robust management processes for the management of modern slavery risk include;

- Development and implementation of a suite of related new VCEA policies approved by the Board and Management
- Establishment of a Modern Slavery risk management capability including;
  - formation of a foundational Modern Slavery Working Group (MSWG) with formalised Terms of Reference (ToR)
  - development and adoption of a Modern Slavery Action Plan 2024-2026
  - biannual Modern Slavery risk reporting to the newly established Finance, Risk and Audit Committee
  - completion of a modern slavery risk and control assessment by management
- New e-learning platform LITMOS implemented (to deliver Modern Slavery learning modules)
- Annual employee engagement survey initiated
- Strengthening of financial delegations, contract and supplier engagement processes
- 100% VCEA suppliers mapped against ACAN Risk Taxonomy and 14 suppliers onboarded to Sedex (Supplier Ethical Data Exchange) platform, covering 23% of VCEA's total spend.

VCEA did not identify any incidents of exposure to modern slavery, real or potential, during the reporting period.

Throughout 2024 VCEA continued participation in the ACAN modern slavery risk management program (ACAN Program). The ACAN Program provided VCEA access to monthly webinars and e-newsletters, tools and templates, guidance materials and supplier engagement activities.

Criteria 3
Modern Slavery risks

Risks in Operations and Supply Chains

VCEA assesses the risks of modern slavery practices in its operations and supply chain by considering its potential to cause, contribute to, or be directly linked to modern slavery through its operations or supply chain.

- **Cause**: Refers to situations where an organisation's actions or decisions might directly create conditions that could lead to human rights violations, including modern slavery.
- **Contribute to**: Indicates scenarios where an organisation's activities indirectly contribute to human rights violations or modern slavery, even if they are not directly causing them. It might involve benefiting from practices that are linked to violations.
- **Directly linked**: Instances where modern slavery is directly connected to an organisation's operations or supply chain through the activities of another entity that they have a business relationship with.

VCEA's suppliers are predominantly resident in Australia and are predominantly service related. As such, VCEA has rated its inherent exposure to modern slavery risk as low, its control environment as acceptable and the risk within the appetite established by the Board. VCEA recognises, however, that it is possible that our suppliers' supply chains may extend outside of Australia. VCEA's modern slavery risk assessment practices are not yet sufficiently mature to extend beyond Tier 1 of our operations and supply chain. Tier 1 in a supply chain refers to the first level of suppliers directly linked to an entity and typically consists of primary suppliers that provide goods and services directly to the organisation.

Our relationship with ACAN assists us in gaining insight into our operational activity partners and suppliers. With ACAN's support we continue to operate an ongoing assessment system of our suppliers.

VCEA as a peak body provides services and undertakes various functions for Catholic school proprietors and Catholic schools in Victoria. VCEA, in turn, procures a range of goods and services to support its operations and these services. All new suppliers introduced in 2024 underwent modern slavery risk identification and assessment.

The risk profile of VCEA's supplier base remained stable throughout 2024, with one area of exception. VCEA faced an elevated risk of encountering modern slavery practices as a result of a building and construction project for new corporate offices that ran throughout 2024. Detailed assessment, supplier assertions and controls were put in place for the suppliers involved in this project (see below Building and Construction).

VCEA supplier data has been reviewed against the ACAN Category Risk Taxonomy, based on the Global Slavery Index and International Labour Organisation (ILO) definitions of modern slavery.

Of the 197 VCEA suppliers engaged in 2024, 47 suppliers have completed the ACAN supplier survey.

- 14 suppliers have joined Sedex (Supplier Ethical Data Exchange) platform which significantly covers 23% of total VCEA spend.
- VCEA percentage of spend in high-risk category areas is 8%, a reduction from 2023.
- Based on the ACAN Category Risk Taxonomy, 25 suppliers (12%) have been identified as a high-risk procurement category with a further 2 suppliers having self-declared through the ACAN supplier survey.

Figure 1.3 Percentage of $ Spend by Taxonomy Risk

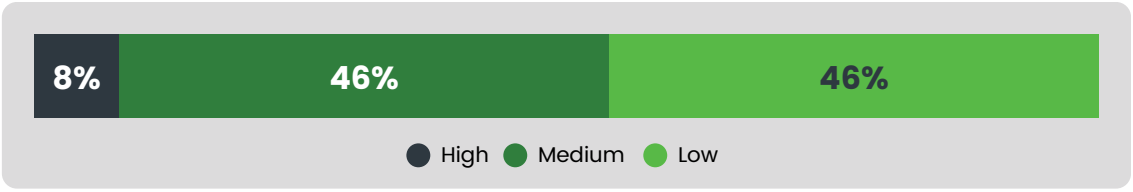
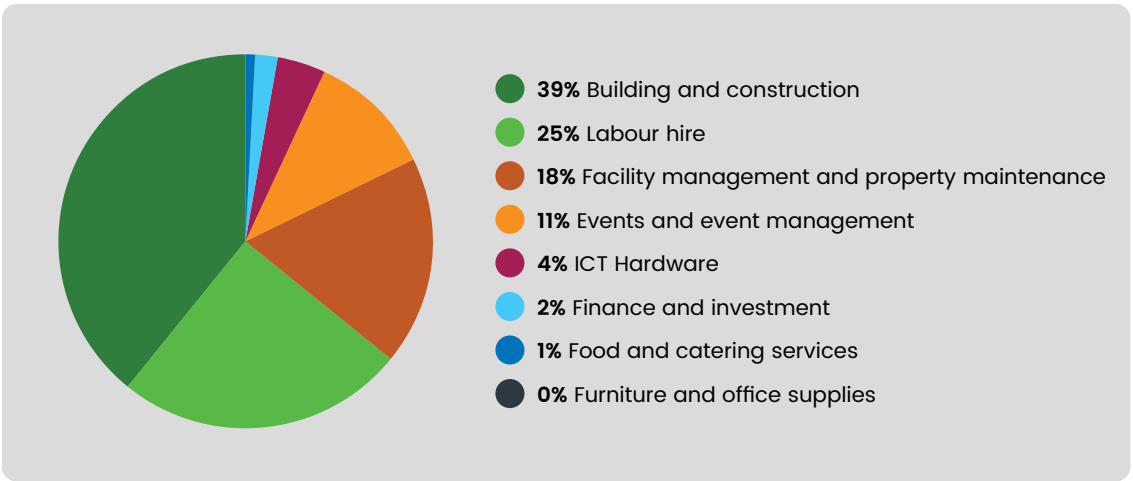


Figure 1.4 % Spend in High-Risk Procurement Categories



In 2024, VCEA's largest categories of expenditure were in the following areas.

- Professional Services and Consultancy
- IT Software and Network Services
- License Fees
- Labour Hire and Recruitment
- Building and Construction

A total of 25 suppliers were identified within the high-risk category (ACAN Category Risk Taxonomy), of which 8 provided labour hire and recruitment services to VCEA.

VCEA's top 10 suppliers by spend (each >$1M), equated to approximately 66% of total expenditure to external suppliers. The largest procurement categories included Professional Services and Consultancy (low risk) and IT Software and Network Services (medium risk).

IT Procurement

VCEA recognises an elevated risk of modern slavery exposure within the IT hardware supply chain and takes a responsible sourcing approach. When sourcing IT hardware, VCEA prioritises well established large companies who meet their own stringent modern slavery obligations in their supply chains.

VCEA procures software and provides consultancy services, as a service supplier, to schools for their student management, financial and payroll systems. As a supplier, VCEA ensures compliance with ethical sourcing and modern slavery obligations. VCEA provides these software and consultancy services under ITC Software and Network Services agreements that reference our modern slavery obligations.

Building and Construction

VCEA engaged in a design and fit-out project in 2024 establishing permanent premises. Aware of modern slavery risks prevalent in the construction sector, VCEA sought to actively mitigate risk through the initial procurement process and in regards outsourcing, which increases the complexity of operations and supply chains and decreases the visibility of labour risks.

Actions included;

- Implementation of robust due diligence in procurement processes including reviewing vendor code of conduct;
- Communicating VCEA's commitment to upholding human rights and zero

tolerance for modern slavery through the procurement process and supplier pre-qualification including sharing the ACAN Code of Conduct with secondary suppliers to reiterate supplier compliance with labour standards and modern slavery policies;

- Ensuring supplier acceptance of clauses in contracts explicitly prohibiting modern slavery and requiring adherence to ethical labour practices.
- Engagement of a building and construction project management firm to monitor all aspects of the delivery of the project including labour practices and overtime.

Employment Risk

Employment Risk & Modern Slavery Mitigation

VCEA maintains a directly employed workforce and engages labour hire or professional consultancy support for specialist projects or periods of increased demand.

The People and Culture team oversees compliance with labour, employment, and immigration laws through a structured framework of policies and procedures. VCEA is committed to maintaining strong governance measures to mitigate modern slavery risks within its employment practices. This includes ensuring that policies, procedures, and guidelines are in place to safeguard employee rights, workplace safety, and overall wellbeing.

Strengthening Employment Governance

Throughout 2024, VCEA conducted comprehensive reviews of its employment related policies, structures, and remuneration frameworks to ensure compliance with employment laws and alignment with best practice conditions and fair remuneration. These reviews reinforce VCEA's commitment to preventing exploitation and fostering an ethical and transparent workplace.

As part of this commitment, VCEA undertook a remuneration framework review and also engaged an independent payroll audit to assess compliance with legal requirements, industry benchmarks, and fair pay practices. The audit identified key recommendations focused on documenting and validating existing payroll processing, rather than requiring changes to current practices. To support continuous improvement, an action plan has been commissioned to enhance process transparency and maintain strong governance and risk mitigation measures.

VCEA employs staff under two primary instruments:

- Catholic Education Multi-Enterprise Agreement 2022 (CEMEA 2022) – covering approximately 14% of staff in 2024.

- Individually negotiated employment contracts – for roles outside the enterprise agreement scope. These contracts are legally endorsed to ensure they are aligned with legislative requirements.

Safe & Ethical Recruitment Practices

VCEA enforces competency-based position descriptions, supported by clear policies and procedures, to ensure transparent and ethical recruitment, selection, and appointment of employees. As part of VCEA's pre-employment compliance processes, all employees, must provide:

- Valid and current Working with Children Check
- Criminal record history check
- Proof of working rights in Australia

The People and Culture team collaborates closely with external labour hire agencies (when required) to verify consultants and short-term temporary staff, ensuring all workers have valid working rights and meet ethical employment standards.

VCEA engages internal legal counsel or external specialist immigration lawyers as needed to support visa holders, ensuring compliance with applicable Department of Home Affairs requirements.

Labour Hire Oversight & Risk Management

VCEA procures Information Technology (IT) consultancy services and support, which are managed by MACS under a Master Services Agreement on behalf of VCEA. As a participant in ACAN and an entity bound by the Act, MACS operates within a well-established policy framework designed to identify, mitigate, and manage modern slavery risks. As MACS operates a robust risk management approach and commitment to ethical employment practices, this arrangement has been assessed as low risk in relation to modern slavery concerns.

Policy Review

During 2024 VCEA undertook an extensive review of its suite of Board approved policies. The table below sets out the relevant policies and the action taken for each by the Board during 2024.

Policy	Purpose
Board Charter including a Director Code of Conduct	To ensure high standards of behaviour are observed by the Directors in the context of their role. *(Reviewed)*
Whistleblower Policy	To govern and promote ethical behaviour at VCEA and to encourage and manage appropriate and responsible whistleblowing. *(Revised)*
Modern – Slavery Policy	To prevent and mitigate modern slavery risk within VCEA operations and supply chains, the policy seeks to ensure that modern slavery does not occur within VCEA operations, its business relationships and extended supply chains. *(Revised)*
Workplace Bullying Discrimination and Harassment Policy	To ensure that VCEA is a safe workplace, where the rights of all employees are respected and where all legal requirements, as outlined in relevant legislation, are adhered to. *(Revised)*
Privacy Policy	To ensure VCEA protects and handles personal and sensitive information lawfully. *(Revised)*
People and Culture policies	A range of policies and procedures to support the safety and wellbeing of employees including; • Code of Conduct for Employees *(New)* • Employee Complaints and Grievances Policy *(New)* • Employee Lifecycle Policy • Equal Opportunity Policy *(New)* • Injury Management and Rehabilitation Policy *(Revised)* • Leave Policy • Performance Planning and Review Policy • Probationary Review Process • Work Health, Safety and Wellbeing Policy *(Revised)* • Working from Home Guidelines *(Revised)*
Employee Assistance Program ('EAP')	To promote a healthy and safe workplace culture through the provision of guidance and resources to help employees achieve a healthy work-life balance, manage stress, and navigate life transitions.
Risk Management Policy & Framework	The policy describes accountability for risk management, reporting protocols, and the approach for the identification, assessment and mitigation of risk. It references VCEA's Risk Management Framework which provides details on VCEA's risk tolerance, appetite and processes for managing risk. *(Revised)*

Criteria 4
Actions taken to assess and address Modern Slavery risks

Throughout the 2024 reporting period, VCEA continued its participation in the ACAN Modern Slavery Risk Management program. With the support of ACAN, VCEA achieved the following actions to address modern slavery risks in its operations.

Establishment of an internal Modern Slavery risk management capability including;

- formation of a foundational Modern Slavery Working Group (MSWG) with formalised Terms of Reference (ToR)
- development of agreed and endorsed Modern Slavery Action Plan 2024-2026
- appointment of a new Modern Slavery Liaison Officer
- biannual Modern Slavery risk reporting to the newly established Finance, Risk and Audit Committee

Embedded modern slavery risk controls in its procurement processes by incorporating contractual clauses which bind suppliers and service providers to addressing modern slavery risks into template contract documents, along with binding suppliers and service providers to the ACAN Supplier Code of Conduct. These template contracts incorporating modern slavery clauses and the ACAN Supplier Code of Conduct are issued in requests for tenders and other pre-contractual processes.

Improving procurement processes for potential suppliers and service providers to include confirmation of their compliance with contractual obligations that address Modern Slavery risks at the tendering stage.

Enhancing risk assessments by utilising the ACAN Taxonomy to identify high-risk suppliers and addressed their risks during the procurement due diligence process.

Continued to recruit a permanent workforce to reduce the reliance on short-term labour hire.

Development and implementation of a suite of new and revised VCEA employment, conduct and risk policies approved by the Board and Management to ensure a safe working environment, including renewal of the Modern Slavery Policy.

Completion of a modern slavery risk and control assessment, across all VCEA operations, as directed by VCEA's Risk Management Framework (2024).

Participation of VCEA staff and directors in Modern Slavery risk mitigation activities including Statement preparation and approval, MSWG meetings, reporting of progress against the action plan, risk assessment and training preparation. Approximately 15 staff and directors had direct involvement in these activities in 2024.

Regular reporting to management and FRAC on risks associated with operations, including modern slavery, through the enterprise risk register. The register is tabled quarterly at meetings of the FRAC and is focused on those risk rated high or extreme and/or those activities operating outside of risk appetite.

Bi-annual reporting of progress against the Modern Slavery Action plan to FRAC.

Implementation of a new e-learning platform (LMS) to enable delivery of whole of organisation Modern Slavery e-learning in 2025 which will provide an important framework for Modern Slavery risk management.

Through ACAN, invited suppliers to complete the ACAN Supplier Survey and to join Sedex (Supplier Ethical Data Exchange) platform.

The VCEA Legal Counsel has reviewed the proposed strengthening of the Act, including introducing a requirement for a modern slavery due diligence system, introducing penalties for non-compliance such as providing false information in a modern slavery statement and failing to submit a modern slavery statement and additional mandatory reporting requirements. It is noted that the Commonwealth government has chosen to undertake further consultation before introducing changes to the Act.

VCEA has noted the appointment of the first Anti-Slavery Commissioner in November 2024.

Supplier Engagement with Sedex

In 2024, 47 suppliers completed the ACAN supplier survey. As a result, 14 VCEA suppliers covering 23% of total spend, were onboarded to Sedex.

Sedex is a data exchange platform designed to enhance data sharing and minimise the burden of risk assessments and risk validation, by mutually recognising the results produced for specific shared suppliers, produced by other members' efforts.

VCEA benefits from ACANs supplier engagement model that identifies common suppliers across multiple Catholic entities within ACAN. VCEA will continue to work with ACAN to encourage suppliers to join Sedex to:

- Manage the risk of modern slavery with existing suppliers
- Screen new suppliers as part of tenders and supplier on-boarding processes
- Gain visibility further upstream in the supply chains
- Validate inherent risk against actual risk.

Criteria 5
Measuring effectiveness

Maturity Assessment

VCEA has completed its second maturity assessment with an overall maturity score of 40%. Given the significant transformation in the operations of VCEA throughout 2024 including renewed governance, direct employment of staff, and the development of VCEA policies and procedures, VCEA is confident that it has laid the foundation for effective management of modern slavery exposure in its operations.

Table 1.5: Maturity Score 2024: Comparative analysis of performance by pillar and sub-pillar

Pillar	2023	2024	+/-
Business process and governance Establishes the overarching structure and policies guiding our efforts, emphasising the importance of oversight and clear responsibilities	34%	42%	+8
Operations Focuses on internal practices and how effectively we manage risks within our day-to-day activities.	33%	38%	+5
Supply chain Examines our external partnerships and the mechanisms in place to assess and mitigate risks beyond our immediate operations.	40%	38%	-2
Worker engagement Addresses how we manage worker engagement and the standards upheld to prevent exploitation.	33%	35%	+2
Entity's programs and activities Looks at the broader initiatives and engagements we undertake to combat modern slavery.	16%	36%	+20
Grievance mechanisms and remediation Evaluates the channels available for reporting concerns and the processes for addressing them.	43%	51%	+8

Sub Pillar	2023	2024	+/-
Governance Sets the framework for our work, with mature governance characterised by strong policies and processes, guided by oversight and accountability.	38%	49%	+11
Risk Assessment Identifies potential at-risk areas in our operations and supply chain, upon which we can act. A mature risk assessment involves continuous monitoring and collaboration and allowing for the prioritisation of resources and mitigating actions.	57%	61%	+4
Risk Management Evaluates how well we apply the mitigating actions, with mature efforts being proactive and adaptable to changing circumstances and driving real and measurable impact.	19%	22%	+3
Effectiveness of Actions Measures the impact of anti-slavery efforts and is what holds us accountable.	20%	29%	+9

VCEA will continue to strengthen its management of modern slavery risk in 2025 through targeted actions with a focus on operations, monitoring the effectiveness of actions, education and training and risk management.

Looking ahead

VCEA commits to monitoring and continued refinement (with support from ACAN) of its multi-year Modern Slavery action plan. The plan will be regularly reviewed to ensure that actions remain relevant and effective and contribute to its modern slavery risk management approach. Feedback from FRAC on the biannual Modern Slavery Risk Reporting will contribute to the refinement of the action plan.

The VCEA MSWG is scheduled to meet four times during 2025 with priorities to:

- Review the maturity assessment results with a particular focus on areas for continued improvement and update the Action Plan accordingly.
- Support the implementation and track progress against the revised Modern Slavery Action Plan.
- Support monitoring, assessment and reporting of Modern Slavery risk.

VCEA is committed to continuous improvement in partnering with our stakeholders to proactively work to reduce modern slavery. In this regard, the 2025 Modern Slavery Action Plan includes the following commitments:

Operations *(systems and processes)*	• Recruitment of a dedicated Procurement Officer • Implement a revised Procurement Policy and procedures • Communicate and embed revised procurement related delegations • Establish a remedy pathway to address and respond to Modern Slavery practices identified in operations or supply chain
Risk management	• Monitor progress and effectiveness of actions (existing and new) and bi-annual reporting to FRAC • Annual modern slavery risk assessment and testing of the effectiveness of VCEA's control structures that address modern slavery risk
Supply chain	• Execute screening processes for 100% of new suppliers as part of tenders and supplier on boarding processes • Invite new high and medium risk category suppliers to complete the ACAN supplier survey and join Sedex • Encourage suppliers to join the 2025 ACAN supplier webinar series
Effectiveness of Actions *(engage, educate & respond)*	• Introduce Modern Slavery e-training modules for all staff and the VCEA Board and Finance, Risk and Audit Committee • Increased engagement with ACAN liaison officers and participation in the ACAN Modern Slavery Risk Management Program.

Remediation

When suspicions of modern slavery practices come to VCEA's attention through internal employee relations processes, whistleblowers or other channels, VCEA's policy and processes call for it to contact relevant law enforcement agencies if a person is in immediate danger or Domus 8.7 for an assessment, investigation, action planning and implementation of a remediation process.

Staff awareness of modern slavery risk in VCEA operations is one of our strongest preventative controls. In 2025, online training (Modern Slavery Awareness) will be offered to VCEA staff to support them in recognising the causes of Modern Slavery, and the mechanisms available to address poor labour practices, unsafe working conditions and other indicators of modern slavery. This training will be extended to the Board with FRAC committee and MSWG members also to undertake Business Relevance, Implementing a Modern Slavery Risk Management Program and Grievance Mechanisms and Remedy modules.

Criteria 6
Consultation

VCEA has no controlled entities that require internal consultation.

In preparing the 2024 Modern Slavery Statement, the following functions have been consulted and/or have contributed material to ensure the statement accurately reflects the practice and policies applied.

Team or function	Input
Finance	Operations and supplier spend
Risk	Risk management approach with respect to modern slavery
People and Culture	Working conditions of employees and contractors, the implementation of training programs to educate on modern slavery risk and other steps to build a culture that places priority on modern slavery and other human rights abuse risks.
Legal	Contractual and legal obligations and legislative requirements
Communication and Advocacy	A description of the current operating context and renewed governance systems

Consultation has also occurred with MACS throughout 2024 in regards the provision of services to VCEA under the MSA.

Criteria 7
Any other relevant information

No further information at this time.

Modern Slavery Statement

1 January–31 December 2024

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