



2024 Modern Slavery Statement

1 January 2024–31 December 2024



Acknowledgement of Country

We wish to acknowledge the traditional custodians of the land on which we operate, the Wurundjeri people of the Kulin Nation. We pay our respects to their Elders past, present, and emerging, recognising their enduring connection to this land.

Mercy Education acknowledges the rich cultural heritage and ongoing contributions of Aboriginal and Torres Strait Islander peoples to our community. We honour the wisdom, resilience, and custodianship of the land that they have demonstrated over generations.

This Modern Slavery Statement has been provided in respect of Mercy Education Ltd.

The use of the title 'Mercy Education' within this document refers to 'Mercy Education Ltd.'

Mercy Education Ltd

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Contents

- Criteria 1: About Mercy Education Ltd 1
- Criteria 2: Operations and Supply Chain 2
- Criteria 3: Modern Slavery Risks 5
- Criteria 4: Actions Taken to Address Modern Slavery Risks 9
- Criteria 5: Assessing Effectiveness 10
- Criteria 6: Internal Consultation 13
- Criteria 7: Other Information 14

Approval statement

Georgina Smith, Board Chair

At Mercy Education, we are committed to upholding the dignity and freedom of every individual, guided by our Catholic and Mercy values of Compassion, Justice, Hospitality, Service, Respect and Courage.

Our commitment to addressing modern slavery is reflected in our policies, our operations, our schools and our engagement with the broader Mercy community. We are dedicated to ensuring that modern slavery is not tolerated in any part of our organisation or its supply chains.



This statement represents Mercy Education's continued pledge to combat modern slavery, as we continue to monitor and refine our approach, ensuring we bring about meaningful change.

With this in mind, I present the Mercy Education Modern Slavery Statement for 2024, in the hope that we can all move forward with greater awareness, accountability, and commitment to justice.

This Modern Slavery Statement was approved by the Mercy Education Board, which is the principal governing body of Mercy Education Ltd as defined by the *Modern Slavery Act 2018 (Cth)* ("the Act") on 20 June 2025.

This modern slavery statement is signed by the Chair as the responsible member of Mercy Education Ltd as defined by the Act.

A handwritten signature in black ink that reads "Georgina Smith". The signature is fluid and cursive.

Georgina Smith
Board Chair
Mercy Education Ltd

About Mercy Education Ltd

Mercy Education is a third sector Catholic organisation responsible for the governance and operation of thirteen Mercy colleges across Victoria, South Australia, and Western Australia. Led by the teachings of Jesus Christ and the vision of Catherine McAuley, foundress of the Sisters of Mercy, we provide services to Catholic schools and have a strong network of affiliated colleges united by the Mercy charism. We are an incorporated Ministry of Mercy Ministry Companions Ltd (MMCL).

Mercy Education is a stand-alone legal entity and is the sole member of Emmanuel College Foundation Limited.

This Modern Slavery Statement covers our 13 Catholic schools spanning across three states. This Statement does not cover schools affiliated with Mercy Education who receive support and professional development whilst operating within a Mercy framework. Such schools have their own governance structures that either do not meet the threshold for reporting under the Act, or who may report as part of another larger entity. Mercy Education Governed Schools are as follows:

Victoria

Academy of Mary Immaculate, Fitzroy
Catherine McAuley College, Bendigo
Emmanuel College, Warrnambool
Mount Lilydale Mercy College, Lilydale
Our Lady of Mercy College, Heidelberg
Sacred Heart College, Geelong
Sacred Heart College, Kyneton
St Aloysius College, North Melbourne
St Joseph's College, Mildura

Western Australia

Mercedes College, Perth
Santa Maria College, Attadale
St Brigid's College, Lesmurdie

South Australia

St Aloysius College, Adelaide

Our Vision

To enrich a dynamic community of Catholic schools committed to the spirit of Mercy.

Our Values

Compassion, Justice, Hospitality, Service, Respect and Courage.

Operations and Supply Chain

The Mercy Education National Office is based in East Melbourne, Victoria. The National Office provides executive level support to both the Board and 13 Catholic schools. This support is focused on strategic and structural matters relating to mission, quality, finance, governance and operations, child safety and wellbeing, compliance, and risk.

Our Board Directors have full responsibility for all civil governance matters. To assist with this oversight, the Board maintains standing committees in respect of Governance, Finance and Audit, Risk and Compliance, Education Standards and Effectiveness and Mercy Identity and Mission.

Operational decision-making at each of the 13 schools is the responsibility of the College Principal, who reports directly to the Chief Executive Officer of Mercy Education.



Our Operations

A snapshot of Mercy Education operations in 2024:

- Mercy Education operated Catholic schools in South Australia (1), Victoria (9) and Western Australia (3)
- Seven of these schools provide a single gender education for girls and the remaining six operate on a co-educational basis. All schools offer a full secondary curriculum, with three of our schools incorporating primary year levels into their operations
- Eight of our schools are based in capital cities and five in major regional centres

- Three of our regional schools operate across dual campuses – all other schools are single campus
- Two of our schools in Western Australia offer boarding facilities
- At 2024's census, 14,135 students were educated in Mercy Education schools
- In 2024, our youngest school was 87 years old, and our oldest school was 178 years old – the average age of our schools since establishment is over 130 years.



Our Workforce Profile

The following staffing guide relates to Mercy Education's 2024 operations:

- Approximately 1,838 staff worked in full-time or part-time employment across Mercy Education schools
- A further 10 staff were employed on a casual basis as emergency teachers, sporting coaches, music tutors and other roles
- In many of the schools, maintenance, groundskeeping, catering, IT (Information Technology) and cleaning are outsourced to contractor services whose employees are not directly employed by Mercy Education. This category consists of an estimated 7,865 organisations.

Our Supply Chain, Goods and Services

In 2024, Mercy Education had a total operational turnover of \$346m. As an educational institution, the major element of our expenditure is teaching and support staff whose salaries and employment related cost represented 67% of our turnover.

In terms of non-staffing expenditure, in 2024, Mercy Education spent \$107m on recurrent expenditure and an additional \$52m on capital expenditure.

In 2024 a supplier analysis was undertaken identifying that Mercy Education works with over 7,865 individual suppliers annually. A breakdown of total expenditure by our schools in each supplier category is included below.

Governance & Risk Framework

The supervision of Mercy Education's responsibilities under the *Modern Slavery Act 2018 (Cth)* has been allocated to the Risk and Compliance Committee (RISKCOM) of the Mercy Education Board. This is consistent with the treatment of other compliance requirements obligated by legislation.

Whilst RISKCOM has primary carriage of this responsibility, it is acknowledged that other Board Committees have a significant interest in the topic including the Board's Finance and Audit Committee (in respect of procurement) and the topics are of particular significance to the Mercy Identity and Mission Committee (in respect of our ethical obligations as people of Mercy).

For these reasons, the Mercy Education Board will always maintain an active role in the supervision of our progress in respect to anti-modern slavery.

The RISKCOM Committee has established the Modern Slavery Working Party: a strategic initiative that convenes quarterly with one representative from each school. This platform fosters discussions on educational opportunities, resources, and curriculum initiatives while reinforcing accountability across supply chains. In 2024, a role description was drafted for Modern Slavery representatives, and this has since been formalised in 2025.

Mercy Education has formally acknowledged the risks of modern slavery within its corporate risk assessment and continues to improve its understanding of potential vulnerabilities within supply chains. Our commitment remains steadfast in actively managing these identified risks, enhancing procurement protocols, and establishing robust reporting mechanisms moving forward.

The corporate risk to Mercy Education was reviewed and existing controls were documented:

- Anti-Modern Slavery Working Party (stakeholder consultation) with Anti-Modern Slavery Liaison Officers re-appointed in each school
- Anti-modern slavery training was provided for new Board Directors, Leadership, and key staff across the organisation
- Anti-modern slavery clauses form part of our major building contracts
- Mercy Education's Supplier Code of Conduct was formally adopted by our major suppliers
- A role description for School Modern Slavery Representatives was drafted (and has since been formalised in 2025).

Modern Slavery Risks

Mercy Education engages with a total of 7,865 suppliers across various sectors. In 2024, Mercy Education procured \$155 million in goods and services. Of this, 72% (\$111 million) was spent in potentially high-risk procurement categories across 11 categories of suppliers. Our major spend categories are detailed on the following page, along with a breakdown of supplier spend per category. Additionally, Mercy Education has drawn on the Australian Catholic Anti-Slavery Network (ACAN)'s references to categorise the modern slavery risks associated with each procurement category.

Supplier Spend Breakdown by Risk Category

The table below summarises our procurement activities, categorising supplier spend based on modern slavery risk:

Risk Category	Supplier Taxonomy	Annual Spend	% of Total Suppliers	No of Suppliers
High	Building & Construction	38,778,891	3%	199
High	Financial Expenses	20,105,476	1%	64
High	Facility & Property Maintenance	12,681,282	8%	596
High	Educational Resources	11,935,228	27%	2095
High	ICT Hardware	7,066,355	1%	115
High	Cleaning & Security Services	6,663,213	1%	77
High	Food & Catering Services	3,749,120	2%	178
High	Utilities	3,640,297	1%	68
High	Furniture & Office Supplies	3,064,499	2%	179
High	Uniforms & PPE	2,178,050	1%	50
High	Labour Hire	1,259,234	2%	123
Medium	Travel & Accommodation	8,385,279	2%	178
Medium	ICT Software & Network Services	5,744,141	3%	243
Medium	Unknown	4,573,448	35%	2730
Medium	Advertising & Marketing	1,546,489	2%	142
Medium	Print / Mail Provider	920,936	1%	43
Medium	Plant & Machinery	900,833	0%	32
Medium	Fleet Vehicles Management	708,933	1%	83

Risk Category	Supplier Taxonomy	Annual Spend	% of Total Suppliers	No of Suppliers
Low	Government & Agency Fees	9,691,967	0%	29
Low	Licence & Membership Fees	9,223,567	5%	405
Low	Professional Services	1,875,996	3%	216
Low	Waste Management	356,630	0%	19
Low	Finance & Investment	14,223	0%	1

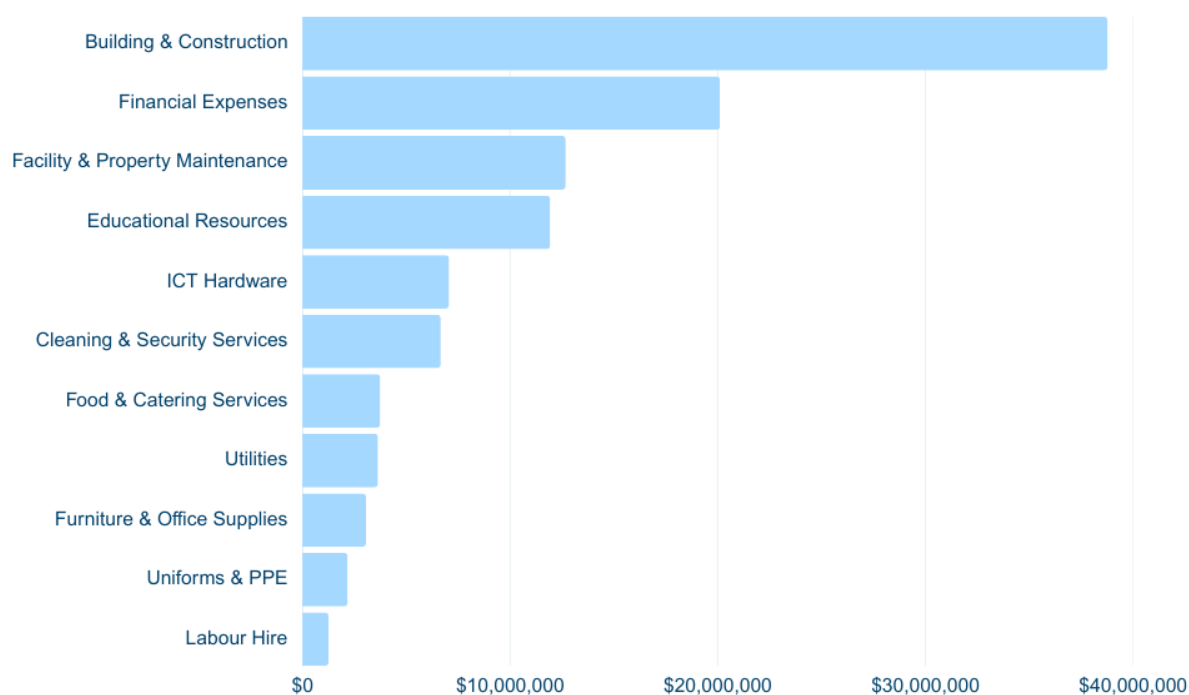
Supply Chain Risk Assessment

Mercy Education continues to assess supply chain risks using the ACAN procurement category risk taxonomy, which helps identify high-risk industry sectors. This analysis also incorporates:

- commodity and product risks identified in internationally recognised reports on forced labour and modern slavery
- insights from the 2023 Global Slavery Index (GSI) and other relevant Australian and global sources.

By refining our supplier profiling, we have improved our ability to identify modern slavery risks, including risks linked to geographical production locations.

Top 10 Procurement Areas by Spend (\$M) - 2024



Key Supply Chain Risks

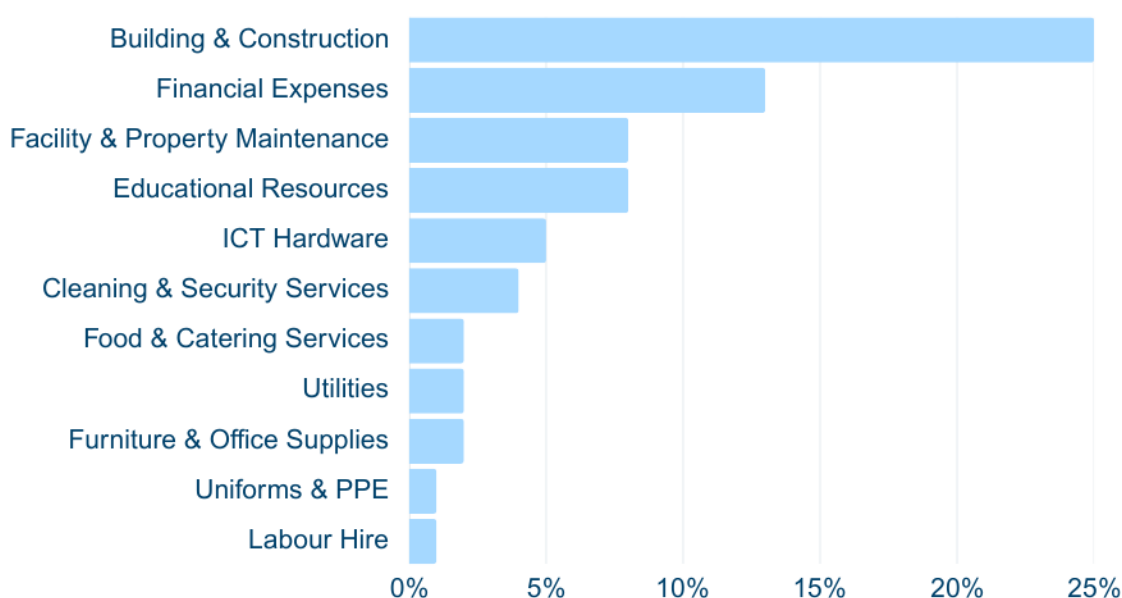
Mercy Education's risk assessment has identified four key procurement areas with an elevated risk of modern slavery:

- Building and construction
- ICT hardware
- Clothing and textiles
- Cleaning and security.

These sectors have been flagged due to their high-risk supply chains, which often involve complex international sourcing and exposure to potential exploitation.

Assessment of High-Risk Procurement

In considering the high-risk categories, Mercy Education has calculated the spend per supplier indicator to assist in prioritising our efforts.



Challenges in Risk Assessment

One of the key challenges in conducting a robust supply chain analysis is the decentralised accounting system across Mercy Education. Each of our 13 schools and the National Office uses different financial software platforms, leading to:

- fragmented data, making risk tracking difficult
- limited visibility over procurement practices
- inconsistent supplier information, impacting our ability to assess modern slavery risks effectively.

To address this challenge, Mercy Education is working towards improving data consistency across all entities, which will enable:

- better risk tracking
- more comprehensive supplier engagement
- enhanced compliance with modern slavery risk management requirements.

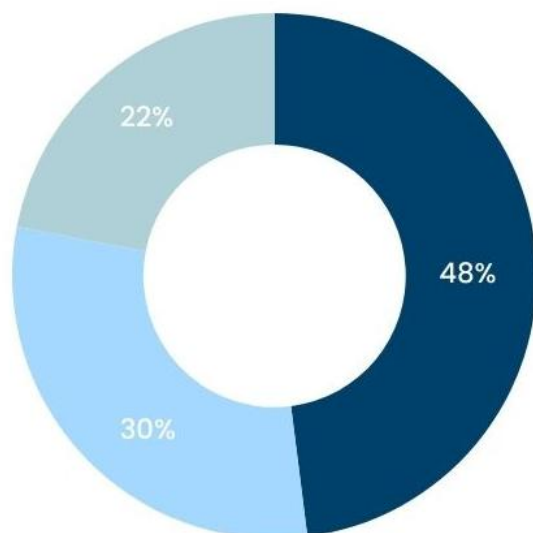
Modern Slavery Risk Metrics

To quantify and prioritise our risk management efforts, Mercy Education has assessed supplier spend using risk indicators. The following metrics provide insight into our high-risk exposure:

- 48% of total suppliers operate in high-risk categories
- 72% of total procurement spend is attributed to high-risk categories
- high-risk category spend totals \$111 million.

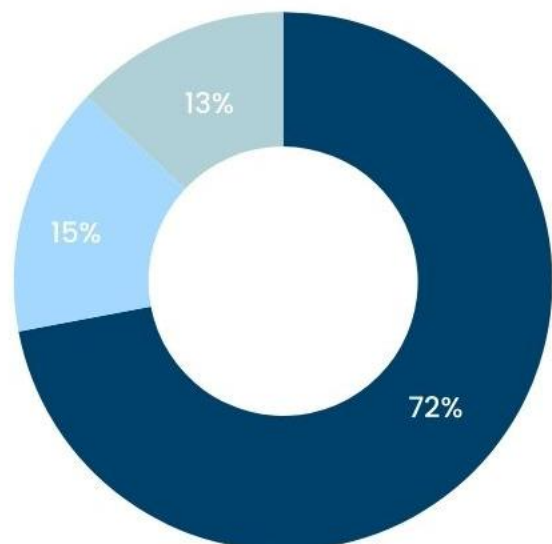
Supplier and Spend Percentage Breakdown

Risk as a percentage of suppliers



- High Risk
- Medium Risk
- Low Risk

Risk as a percentage of total spend



- High Risk
- Medium Risk
- Low Risk

Actions Taken to Address Modern Slavery Risks

Embedding Modern Slavery Controls in Procurement

Mercy Education integrates modern slavery considerations into procurement through:

- tender and contract processes: New contracts include modern slavery clauses
- supplier due diligence: Key suppliers in high-risk categories (e.g., uniforms, ICT, cleaning) are reviewed annually
- supplier engagement: Regular communication with suppliers regarding modern slavery expectations
- sector collaboration: Continued participation in ACAN working groups and initiatives.

Staff Training and Capacity Building

- 9 Mercy Education staff completed ACAN modern slavery e-learning modules in 2024, with a total of 4 courses completed
- Three Working Group meetings were conducted on modern slavery, with 16 staff participating
- Modern slavery responsibilities have been embedded into relevant position descriptions and role expectations.

Risk Monitoring and Reporting

- Ongoing risk assessments in high-risk procurement categories such as cleaning, construction, ICT, and uniforms
- Development of a risk control monitoring process to track implementation across all schools
- Annual Board reporting on modern slavery compliance and mitigation efforts.

Grievance Mechanism and Remediation

- Staff and suppliers can currently report concerns via Mercy Education's Whistleblower Policy.
- Mercy Education is integrated with Domus 8.7's remediation service, ensuring appropriate responses to modern slavery risks.

Assessing Effectiveness

Mercy Education has adopted ACAN Baseline Data metrics in 2024 that capture the outcomes of some of our actions. This will help to demonstrate continuous improvement when compared with data year on year and assist in planning future actions.

2024	Activity	2024	2023
Internal / Staff	Hours spent on modern slavery activities	77	30
	Individual staff completed e-learning	15	20
	E-learning modules completed	70	100
External / Supplier Engagement	Total number of suppliers	7,865	6,033
	Number of suppliers with visible contact information and ABN	193	213
	Number of suppliers across high-risk categories	176	1,337
	Number of ACAN Supplier Surveys completed	79	76
	Supplier staff attending capacity building webinars	0	42
	Invited to join Sedex	29	12
	Joined Sedex	23	3
	Sedex SAQ completed	11	1
	Social audits	0	1
	Corrective actions	0	0
Domus 8.7 External Referrals	Contacts made via worker voice / grievance mechanism	0	0
	Referrals for advice assistance	0	0
	Individuals identified or referred for modern slavery assessment	0	0
	Individuals with modern slavery cases remediated	0	0

The ACAN Modern Slavery Maturity Assessment provides a score card of Mercy Education's capabilities to mitigate the risk of modern slavery in its operations and supply chains. The score card is generated from a self-reported Entity Profile Survey generated by ACAN and can be used to set future direction, establish a multi-year action plan and identify where to allocate resources for the most benefit.

The scoring scale ranges from: 0 to 100

Achieving a score of 100 signifies the complete demonstrated capability to assure modern slavery risks are not present in operations and supply chains through validated and verifiable evidence. This is an aspirational and long-term goal.

By mapping progress on a more nuanced continuum, entities can show improvement through incremental steps towards long-term objectives. Understanding that ending modern slavery is an ambitious goal, the scoring system is designed to recognise more granular actions and impacts.

The maturity score is designed to provide a comprehensive view of Mercy Education's efforts across key areas of operation, presented as pillars:

1. **Business Process and Governance:** Establishes the overarching structure and policies guiding our efforts, emphasising the importance of oversight and clear responsibilities.
2. **Operations:** Focuses on internal practices and how effectively we manage risks within our day-to-day activities.
3. **Supply Chain:** Examines our external partnerships and the mechanisms in place to assess and mitigate risks beyond our immediate operations.
4. **Worker Engagement:** Addresses how we manage worker engagement, and the standards upheld to prevent exploitation.
5. **Program and Activities:** Considers the broader initiatives and engagements we undertake to address modern slavery.
6. **Grievance Mechanisms and Remediation:** Evaluates the channels available for reporting concerns and the processes for addressing them.

Our maturity is also measured across four sub-pillars to help evaluate strengths and weaknesses in our approach that cover: governance, risk assessment, risk management and effectiveness.

The 2024 result for Mercy Education is 36%

The 2024 score is a 2% increase from 2023 and reflects an emerging level of practice beyond foundational and basic risk management. Our processes are well-defined, standardised, and integrated into the organisational culture and operations. The focus extends beyond individual projects to include organisation-wide standardisation and continuous process improvement accompanied by adequate staffing and resources.

Pillar	Governance	Risk Assessment	Risk Management	Effectiveness of Actions	Maturity Score 2024
Business Process and Governance	43%	50%	26%	31%	38%
Operations	43%	38%	23%	35%	35%
Supply Chain	0%	80%	25%	12%	29%
Worker Engagement	16%	41%	22%	16%	24%
Entity's Program and Activities	100%	15%	30%	31%	44%
Grievance Mechanisms and Remediation	63%	60%	29%	25%	44%
Average	44%	47%	26%	25%	36%

Internal Consultation

Mercy Education does not own or control any other entities. Mercy Education is the sole member of Emmanuel College Warrnambool Foundation Limited.

Internal consultation is currently managed by the appointed Modern Slavery Representatives in each school.

Other Information

Case Study:

Raising Awareness of Forced Marriage

School	Santa Maria College, Attadale, Western Australia
Activity	Year 11 ATAR – Unit 2: Societal and Religious Views on Forced Marriage
Date	Term 2, 2024
Type of Awareness	Forced Marriage
Participants	85 Year 11 ATAR students and 4 teachers

Overview

As part of the Year 11 ATAR Religion and Life curriculum, Santa Maria College students explored the issue of forced marriage, examining its impact within Australian society and through the lens of Catholic teachings. The unit aimed to deepen students’ understanding of forced marriage as a form of modern slavery, fostering critical thinking about ethical, social, and religious responses to this global issue.

Incorporating Modern Slavery Awareness

The learning activity involved:

- Analysing the key features and motivators behind forced marriage
- Comparing societal and religious perspectives on the issue, particularly in the Australian context
- Exploring the Catholic Church’s stance and response, emphasising human dignity, justice, and advocacy against forced marriage.

Key Takeaways and Impact

Students gained a comprehensive understanding of forced marriage as a violation of human rights through the unit. They were encouraged to reflect on how societal and religious perspectives influence policy and advocacy efforts. By critically engaging with real-world examples and Catholic teachings, students developed an awareness of their role in promoting justice and dignity for vulnerable individuals.

This initiative highlights the importance of education in addressing modern slavery, equipping young people with the knowledge and ethical foundation to challenge injustices in society.

Case Study:

Responding to the Need of Our Time: Raising Awareness of Exploitation in Supply Chains

School	Catherine McAuley College, Bendigo, Victoria
Activity	Responding to the Need of Our Time (Session at the 2024 Australasian Mercy Secondary Schools Association Student Conference)
Date	26 June 2024
Type of Awareness	Exploitation in Supply Chains
Participants	145 students and educators

Overview

As part of the 2024 Australasian Mercy Secondary Schools Association Student Conference, Catherine McAuley College students took part in a session titled *Responding to the Need of Our Time*, which focused on modern slavery and exploitation in global supply chains. Delivered in collaboration with Young Mercy Links and Mercy Hub Melbourne, the session aimed to empower students with knowledge about ethical consumption and their role in advocating for change.

Incorporating Modern Slavery Awareness

During the session, delegates were introduced to the work of Young Mercy Links, with presenters sharing their personal experiences of working with vulnerable and marginalised communities in Australia and overseas. Discussions on global conflicts highlighted the links between displacement, vulnerability, and exploitation.

To deepen their understanding, students were asked to bring an item of clothing to swap with others. This interactive activity sparked conversations about sustainable fashion, ethical consumer choices, and the importance of addressing exploitation within supply chains.

Key Takeaways and Impact

Students left the session with a greater awareness of the hidden injustices in global supply chains and the power they have to make a difference. They were encouraged to challenge exploitative practices by adjusting their purchasing habits, raising awareness in their communities, and using their voices to advocate for ethical fashion. The session reinforced the message that even small, individual actions can contribute to meaningful change.

This initiative highlighted the importance of education in tackling modern slavery, equipping students with the knowledge and motivation to be part of a more just and sustainable future.

Collaboration and Partnerships

This session was made possible through collaboration with:

- Young Mercy Links South Australia
- Young Mercy Links Victoria
- Mercy Hub Melbourne.

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