



Mercy
Education

Modern Slavery Statement

1 January – 31 December 2025

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Acknowledgement of Country

Mercy Education acknowledges all Aboriginal and Torres Strait Islander peoples as the Traditional Custodians of Country and the lands on which our National Office and 13 Catholic schools stand.

We pay our respects to Elders past and present, and their continuing connection to land, waters, skies, and community. We recognise Aboriginal and Torres Strait Islander peoples as the first educators on Country who, for generations, have shared and preserved their knowledges, stories and wisdoms.

Mercy Education reaffirms its commitment to the ongoing journey of reconciliation, and to deepening our collective understanding of First Nations histories, cultures and perspectives.

Disclosure note

This Modern Slavery Statement applies to Mercy Education Ltd. The use of the title 'Mercy Education' within this document refers to 'Mercy Education Ltd.'

National Office Suite 2.02, Level 2, 289 Wellington Parade South, East Melbourne, VIC 3002

Website www.mercy.edu.au

Email contact@mercy.edu.au

ABN 69 154 531 870 | **ACN** 154 531 870

Contents

Statement, Approval & Signature	3
Criteria 1: About Mercy Education Ltd	4
Criteria 2: Operations and Supply Chain.....	5
Our Operations.....	6
Our Workforce Profile	6
Our Supply Chain, Goods and Services	6
Governance & Risk Framework.....	7
Criteria 3: Modern Slavery Risks.....	8
Supplier Spend Breakdown by Risk Category	9
Supply Chain Risk Assessment	10
Key Supply Chain Risks.....	11
Modern Slavery Risk Metrics	12
Supplier and Spend Percentage Breakdown.....	12
Criteria 4: Actions Taken to Address Modern Slavery Risks	13
Implementation of ROTA.....	13
Governance and Policy Framework	13
Embedding Modern Slavery Controls in Procurement.....	14
Staff Training and Capacity Building	14
Risk Monitoring and Reporting.....	14
Grievance Mechanism and Remediation	14
Criteria 5: Assessing Effectiveness.....	16
Criteria 6: Internal Consultation.....	19
Criteria 7: Other Information.....	20

Statement, Approval & Signature

Statement from our Board Chair

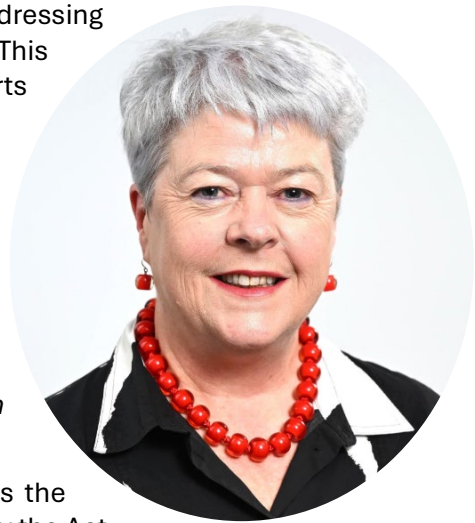
At Mercy Education, we are committed to upholding the dignity and freedom of every individual, guided by our Catholic and Mercy values of Compassion, Justice, Hospitality, Service, Respect and Courage.

In 2025, we remained committed to assessing and addressing modern slavery risks in our operations and supply chains. This includes reporting on our continuous improvement efforts and engaging with the broader Mercy community.

This statement covers Mercy Education's 2025 anti-slavery actions and effectiveness measures that demonstrate our compliance with the *Modern Slavery Act 2018* (Cth).

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 26 June 2026.

This Modern Slavery Statement is signed by the Chair as the responsible member for Mercy Education Ltd as defined by the Act.



Audrey Brown

Board Chair

Criteria 1

About Mercy Education Ltd

Mercy Education Limited (**MEL**) is a company limited by guarantee which leads, governs and supports thirteen Mercy Colleges across Victoria, South Australia and Western Australia.

Continuing the rich history and tradition of these Colleges founded by the Sisters of Mercy, we are inspired by the ministry of Venerable Catherine McAuley and the work of the Sisters in being living witnesses of God's mercy in the world.

Our vision is to continue to enrich a dynamic community of Catholic Colleges committed to the spirit of Mercy.

This educational ministry is one of several not-for-profit works of Mercy Ministry Companions (**MMC**), a Ministerial Public Juridic Person (**MPJP**) operating throughout Australia.

This Modern Slavery Statement covers our 13 Catholic Colleges 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 Colleges 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.

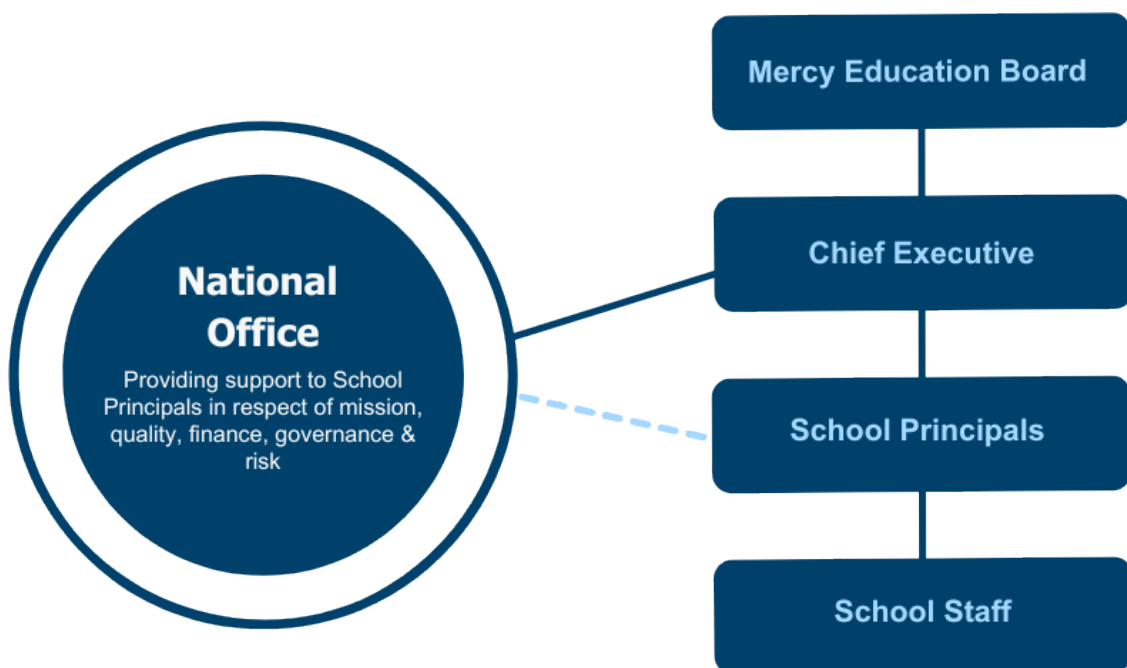
Criteria 2

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 Colleges. This support is focused on strategic and structural matters relating to mission, finance, governance and operations, human resources, child safeguarding, 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, Mission and Educational Performance

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



Our Operations

A snapshot of Mercy Education operations in 2025:

- Mercy Education operated Catholic Colleges in South Australia (1), Victoria (9) and Western Australia (3)
- Seven of these Colleges provide a single gender education for girls and the remaining six operate on a co-educational basis. All Colleges offer a full secondary curriculum, with three of our Colleges incorporating primary year levels into their operations. One College operates an Early Learning Centre.
- Eight of our Colleges are based in capital cities and five in major regional centres
- Three of our regional Colleges are multi-campus schools with the rest operating on a single campus
- Two of our Colleges in Western Australia offer boarding facilities
- At 2025's census, 14,445 students were educated in Mercy Education Colleges
- In 2025, our youngest College was 88 years old, and our oldest College was 179 years old – the average age of our Colleges since establishment is over 130 years



Our Workforce Profile

The following staffing guide relates to Mercy Education's 2025 operations:

- Approximately 2,199 staff worked in full-time or part-time employment across Mercy Education Colleges
- A further 48 staff were employed on a casual basis as emergency teachers, sporting coaches, music tutors and other roles
- In many of the Colleges, maintenance, groundskeeping, catering, IT (Information Technology) and cleaning are outsourced to contractor services whose employees are not directly employed by Mercy Education.

Our Supply Chain, Goods and Services

In 2025, Mercy Education had a total operational turnover of \$375m. As an educational institution, the major element of our expenditure is teaching and support staff whose salaries and employment-related cost represented 65% of our turnover.

In terms of non-staffing expenditure, in 2025, Mercy Education spent \$107m on recurrent expenditure and an additional \$130m on capital expenditure.

In 2025, a supplier analysis was undertaken identifying that Mercy Education works with 8,588 individual suppliers annually. A breakdown of total expenditure by our Colleges in each supplier category is included below (see Criteria 3).

Governance & Risk Framework

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 other compliance requirements obligated by legislation.

Whilst the 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 Mission and Educational Performance 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.

Mercy Education established the Modern Slavery Working Party: a representative committee that includes one representative from each College. The purpose of this platform is to foster 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 was 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.

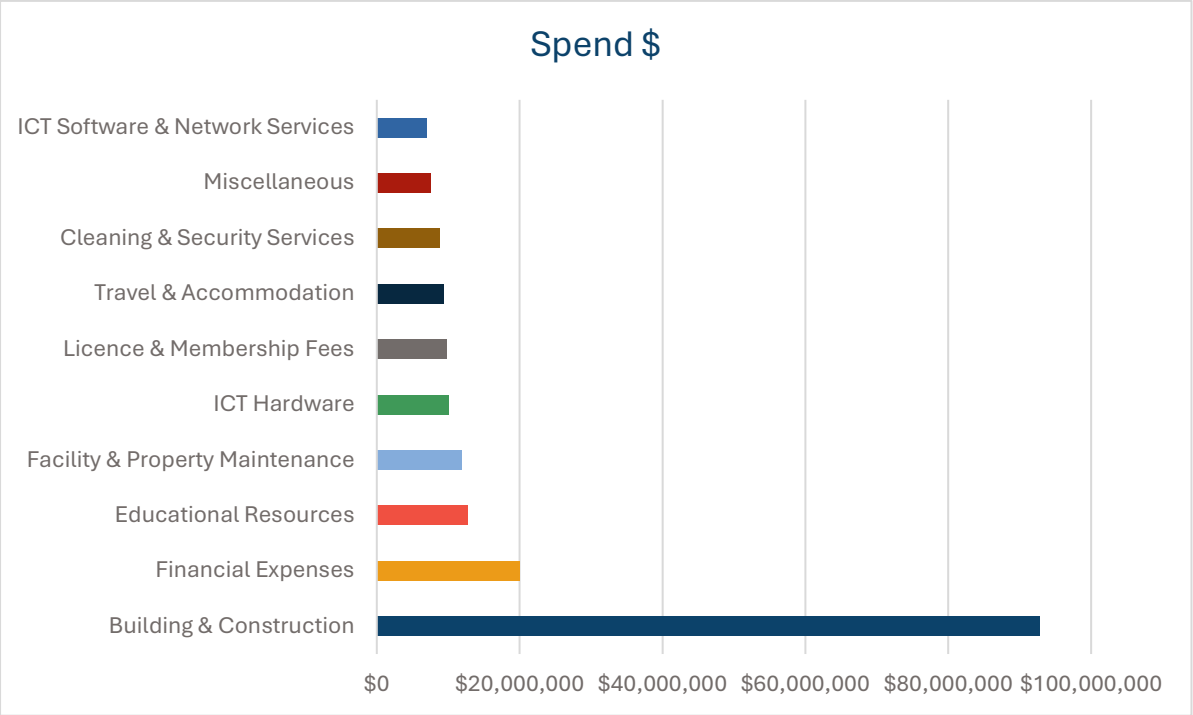
Mercy Education's Risk Appetite Statement and Risk Register as approved by the Mercy Education Board states the following: "Mercy Education opposes all forms of modern slavery and has a commitment to ensure that modern slavery does not flourish within its operations, business relationships and extended supply chains".

Criteria 3

Modern Slavery Risks

Mercy Education engages with a total of 8,588 suppliers across various sectors. In 2025, Mercy Education procured \$216 million in goods and services across 23 supplier categories. Of this, 68% (\$148 million) was spent in 11 potentially high-risk procurement categories of suppliers. Our major spend categories are detailed below, along with a breakdown of supplier spend per category. Additionally, Mercy Education has drawn on the Australian Catholic Anti-Slavery Network (**ACAN**)’s risk taxonomy to categorise the modern slavery risks associated with each procurement category.

Top 10 Spend Supplier Categories



Supplier Spend Breakdown by Risk Category

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

Risk	Category	No of Suppliers	% of Suppliers	Total Spend	% of Total Spend
High	Building & Construction	204	2%	\$92,758,003	43%
High	Cleaning & Security Services	95	1%	\$8,743,960	4%
High	Educational Resources	2,234	26%	\$12,674,707	6%
High	Facility & Property Maintenance	670	8%	\$11,923,831	5%
High	Finance & Investment	1	0%	\$14,717	0%
High	Food & Catering Services	236	3%	\$3,926,797	2%
High	Furniture & Office Supplies	186	2%	\$2,720,817	1%
High	ICT Hardware	139	2%	\$10,032,954	5%
High	Labour Hire	123	1%	\$3,538,472	2%
High	Uniforms & PPE	52	1%	\$1,725,501	1%
High	Waste Management	21	0%	\$453,926	0%
Medium	Advertising & Marketing	161	2%	\$1,799,636	1%
Medium	Fleet Vehicles Management	83	1%	\$851,293	0%
Medium	ICT Software & Network Services	274	3%	\$6,964,256	3%
Medium	Plant & Machinery	34	0%	\$555,804	0%
Medium	Print / Mail Provider	49	1%	\$919,421	0%
Medium	Travel & Accommodation	198	2%	\$9,310,971	4%
Medium	Miscellaneous	3,011	35%	\$7,494,623	3%
Medium	Utilities	80	1%	\$4,456,103	2%
Low	Financial Expenses	70	1%	\$20,047,250	9%
Low	Government & Agency Fees	27	0%	\$4,118,274	2%
Low	Licence & Membership Fees	421	5%	\$9,840,319	5%
Low	Professional Services	219	3%	\$1,939,395	1%
Total		8,588		\$216,811,029	

Supply Chain Risk Assessment

Mercy Education assesses supply chain risks using the ACAN procurement category risk taxonomy, which helps identify high-risk industry sectors. Modern slavery risks are defined by the ACAN Category Risk Taxonomy, a classification standard that identifies severity of actual or potential harm to people (saliency) in spend categories.

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

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

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

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

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.

Key Supply Chain Risks

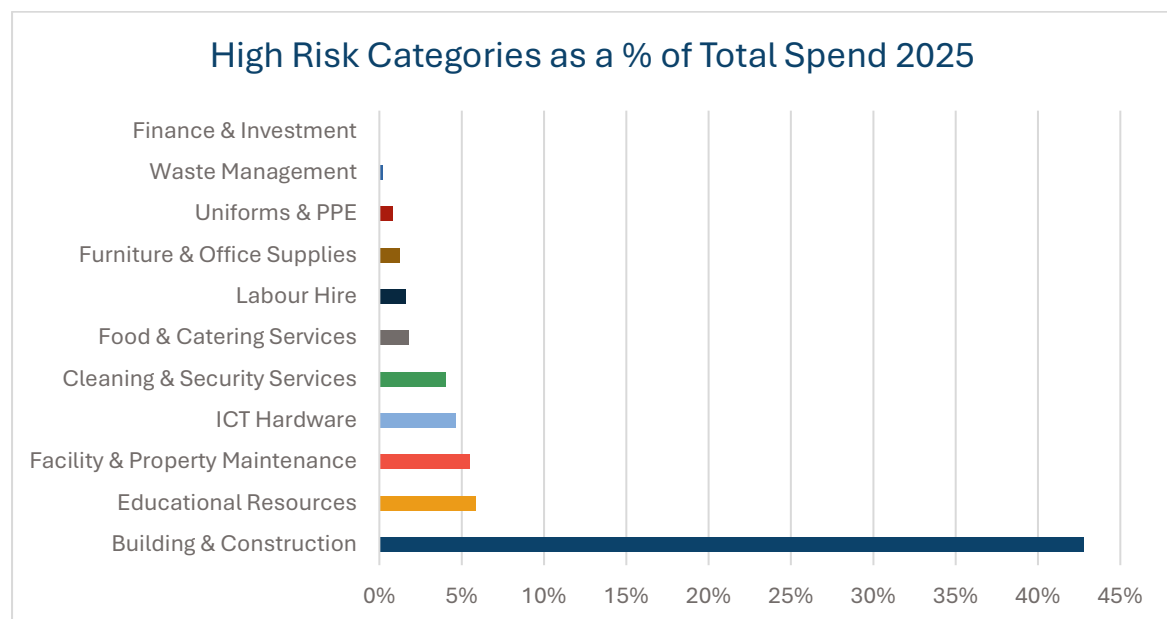
Mercy Education's risk assessment has identified three key procurement areas with an elevated risk of modern slavery:

- Building and construction
- Uniforms and PPE
- 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. Notably with regards to Uniforms and PPE, although this is a small direct spend by Mercy Education as a percentage of total spend, this is under-represented because the spend is largely incurred by parents purchasing uniforms from uniform suppliers.

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.

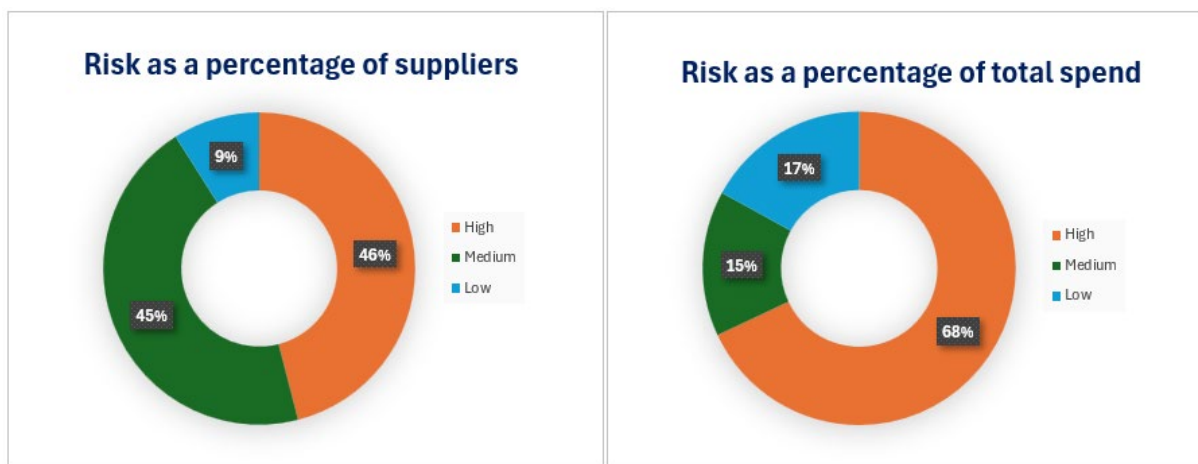


Modern Slavery Risk Metrics

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:

- 46% of total suppliers operate in high-risk categories
- 68% of total procurement spend is attributed to high-risk categories
- high-risk category spend totals \$148 million.

Supplier and Spend Percentage Breakdown



Criteria 4

Actions Taken to Address Modern Slavery Risks

Implementation of ROTA

The ACAN modern slavery risk management program provides supplier engagement support and data, enabling a systematic and comprehensive supply chain risk assessment. In 2025 the ACAN Modern Slavery Risk Management Program launched a new purpose-built data management platform - ROTA. ROTA centralises the ACAN Risk Management Program framework and facilitates supplier performance evaluation and engagement through:

1. Evaluation of the modern slavery risk within operations and supply chains, using the ACAN Risk Taxonomy.
2. ACAN Supplier Survey to identify supplier revenue, number of employees, countries of origin for goods sourced overseas, workforce contractual arrangements and Sedex membership status.
3. Supplier education on modern slavery and risk management in key areas: cleaning, building and construction, procurement of labour, labour hire and services, sourcing goods from overseas, grievance mechanisms and remediation.
4. Onboarding suppliers to Sedex requires a business address, contact details and goods or services provided.
5. Sedex Self-Assessment Questionnaire (SAQ) helps suppliers to evaluate their practices against established standards and identify areas for improvement.
6. Desktop review to identify key actions required from suppliers.
7. Enhanced supplier screening using Know Your Client (KYC) intelligence software.
8. Corporate Social Compliance Audits provide a point in time, objective and independent verification process of supplier alignment with local laws and worker wellbeing standards.
9. Domus 8.7 Index modern slavery statement assessment on selected suppliers in high-risk categories.

Governance and Policy Framework

Mercy Education integrates modern slavery risk controls into its governance framework by:

- embedding anti-modern slavery commitments in policies and procedures
- applying a supplier code of conduct
- requiring modern slavery clauses in all new contracts and contract renewals
- reviewing and updating policies annually to strengthen our response

Embedding Modern Slavery Controls in Procurement

Mercy Education integrates modern slavery considerations into procurement through:

- Establishing and maintaining supplier contracts that include modern slavery clauses
- Selecting supply partners that comply with modern slavery standards
- Implementing due diligence processes to assess appropriateness of market participants on Mercy Education tenders.
- Promoting modern slavery awareness through internal policies, staff training and participation in ACAN working groups and initiatives.

Staff Training and Capacity Building

- Members of the Mercy Education Board, National Office and Modern Slavery Working Party were required to complete a suite of 5 ACAN modern slavery e-learning modules suite over a 2-year cycle commencing in 2024. A total of eighteen people have completed all five modules and a further five people have completed at least one module.
- A Working Group meeting was conducted on modern slavery, with 12 staff participating.

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 Colleges
- 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 and Complaints Management Policy.

Mercy Education is a founding member of Domus 8.7. Domus 8.7 was established as an agency of the Catholic Archdiocese of Sydney in 2020 as a key element of the ACAN Modern Slavery Risk Management Program. This collaborative approach to remediation is aligned with the Modern Slavery Act and Catholic Social Teaching which are centred on the needs, wellbeing and empowerment of people impacted.

Due to Mercy Education's membership of ACAN, the Domus 8.7 services that are available to Mercy Education if required include:

- resources that enable us to listen to workers (grievance channel)
- a 24/7 careline for workers on our sites, staffed by professional counsellors
- direct support to people impacted by modern slavery
- guidance and technical assistance to prevent, identify and remediate modern slavery
- a documented process to assess if an organisation has caused, contributed or is directly linked to modern slavery and modern slavery indicators

Domus 8.7 empowers people impacted by modern slavery to have choice and control over what forms of remediation are meaningful to them and to engage safely with business/supply chain actors. Supports may include:

- modern slavery indicator assessment
- needs assessment, case coordination, response and remediation planning
- referrals to community, social services, unions
- transport, accommodation, financial and food support
- legal support, referrals, accompaniment and advocacy
- job training, retraining and redeployment
- accompaniment and advocacy to engage with government and law enforcement agencies
- opportunities to contribute lived expertise to improve modern slavery responses

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

Criteria 5

Assessing Effectiveness

Mercy Education uses ACAN Baseline Data metrics that capture the outcomes of some of our actions. The data demonstrates continuous improvement when compared with data year on year and assists in planning future actions.

2025	Activity	2025	2024
Internal / Staff	Hours spent on modern slavery activities	80	77
	Individual staff completed e-learning	11	15
	E-learning modules completed	31	70
External / Supplier Engagement	Total number of suppliers	8,588	7,865
	Number of suppliers across high-risk categories	3961	176
	Number of ACAN Supplier Surveys completed	935	79
	Supplier staff attending capacity building webinars	19	0
	Invited to join Sedex	106	29
	Joined Sedex	58	23
	Sedex SAQ completed	37	11
	Social audits	1	0
	Corrective actions	6	0
	Contacts made via worker voice / grievance mechanism	0	0
Domus 8.7 External Referrals	Referrals for advice assistance	0	0
	Individuals identified or referred to modern slavery assessment	0	0
	Individuals with modern slavery cases remediated	0	0

Continuous improvement

Collaboration is at the heart of accelerating progress. This also includes opportunities to comparatively measure social, environmental and governance (business ethics) risks and actions with peers in our network. In its foundational stages, Mercy Education used an internally devised ACAN framework to measure progress. This bespoke approach reflected the unique priorities, constraints, and practices across Catholic organisations.

In 2025, the ACAN Program adopted a globally recognised risk measurement system through SEDEX. This aligns reporting entities with a methodology that combines global data about risks in different countries and industries with site-specific information from the SEDEX platform. SEDEX regularly updates the methodology to ensure it is aligned with new and emerging risks. Therefore, completion of the SEDEX Self-assessment Questionnaire (SAQ) completed by Mercy Education is a substantial measure of continuous improvement year on year. Below is an explanation of how scoring is calculated using the SEDEX SAQ Mercy Education's 2025 risk scores and management controls that will serve as our benchmark for continuous improvement.

Explanation of Scoring

Combined Risk Score: calculated from inherent risk and site characteristics, adjusted for management controls and audit results. The score is broken down by pillar and highlights strengths and opportunities to focus our efforts on key areas that drive ethical and sustainable practices.

Inherent Risk Score: predicts potential risks based on a country/region, and sector. Spanning all four pillars, this score is broken down by topics. It can be used as a baseline to identify and prioritise areas for improvement in operations. This score shows the natural risks of doing business in a specific country or sector. It does not include any details about individual sites.

Combined Risk Score
3.5 _{/10}
● Low risk

- **Labour Standards Pillar** - assesses location and industry factors that could increase labour risks, such as vulnerable worker populations or high rates of workplace violations.
- **Health and Safety Pillar** - considers regional and industry-specific health and safety risks, including local regulations and industry accident rates.
- **Business Ethics Pillar** - assesses industry and location risks related to unethical practices, such as high corruption levels or weak regulatory oversight.
- **Environment Pillar** - examines the environmental impact of the site's industry and location, such as pollution levels or resource use that may create regulatory or compliance risks.

Inherent Risk ● 2.9/10 (Low risk)			
Labour Standards	Health and Safety	Business Ethics	Environment
2.9 _{/10}	2.2 _{/10}	1.8 _{/10}	3.3 _{/10}

Site Characteristics Risk Score: highlights potential risks based on our suppliers' SAQ responses in the Labour Standards and Health and Safety pillars. This score can be used to assess and support the implementation of policies and processes that mitigate workplace risks within our supply chain. For the Environment SAQ, site characteristics consider the type of work, business and location (e.g. proximity to sensitive areas). For the Core SAQs, risks are assessed based on the nature of the work, such as exposure to heavy machinery or hazardous materials.

Labour standards - reflects labour-related risks like employment practices, workers rights and wages based on SAQ responses. High-risk activities in this area can raise the score.

Health and Safety - based on SAQ responses to questions about site-specific health and safety factors, such as equipment usage, handling of chemicals or accident risks.



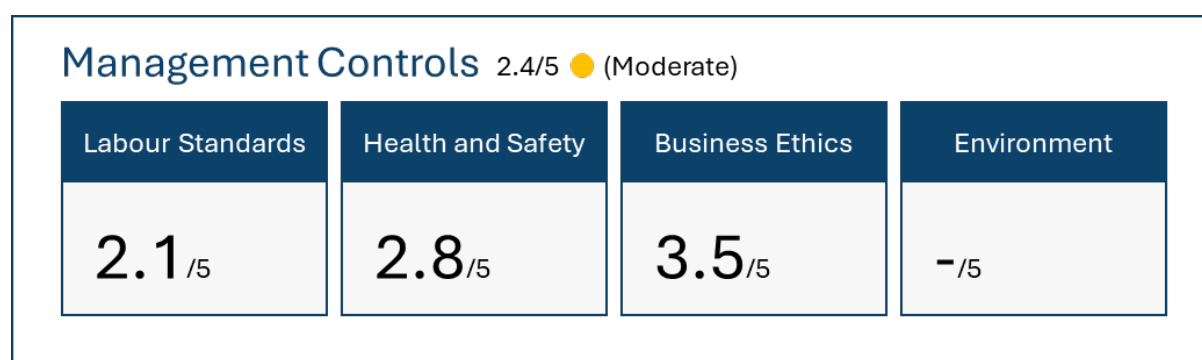
Management Controls Score: measures how well policies or processes are in place to reduce the risks from the site characteristics. It is also based on answers in the SAQ. A Poor score of 0-0.9 indicates that there are few or no controls in place. An Advanced score of 4-5 indicates that there are exemplary controls that exceed compliance and drive innovation.

Labour standards - evaluates policies and processes to ensure fair labour standards and worker protections are effectively managed.

Health and Safety - reviews the adequacy of safety protocols, emergency preparedness and training efforts to manage health and safety risks on site.

Business Ethics - evaluates controls against unethical practices such as anti-bribery policies, compliance with legal standards and transparent operations.

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



Note: Environment does not have a score as risk questions are not triggered because Mercy Education has not identified potential for significant impacts on the environment, and no additional requirements are in place for clients and service provided not involving high-emission activities.

Criteria 6

Internal Consultation

The Anti-Modern Slavery Working Party was established to serve as a consultative forum with Anti-Modern Slavery Liaison Officers appointed in each College. Further internal consultation is currently managed by the appointed Modern Slavery Representatives in each College.

Modern slavery remains a standing item on RISKCOM's annual workplan. This ensures regular oversight of Mercy Education's risk exposure, mitigation measures and progress against its modern slavery commitments, pursuant to Mercy Education's Risk Management Framework.

Criteria 7

Other Information

No other relevant information



Mercy
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Mercy Education Limited

Level 2, 289 Wellington Parade South
East Melbourne VIC 3002

Phone: (+613) 9977 3870

Web: www.mercy.edu.au

ABN 69 154 531 870
