

# **Modern Slavery Statement 2024**

**1 January 2024 – 31 December 2024**







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The Little Company of Mary Health Care Limited (Calvary) head office is located at Level 15, 345 George Street, Sydney NSW 2000  
 ABN 11 079 875 687. Website: <https://www.calvarycare.org.au>. Contact email for Modern Slavery: [info@calvarycare.org.au](mailto:info@calvarycare.org.au)

## Disclosure Note

This statement has been made on behalf of Little Company of Mary Healthcare Ltd. This Statement covers all entities owned or controlled by Little Company of Mary Healthcare Ltd. ABN 11 079 875 697.







# Approval and Signature

## Statement from Martin Bowles, National CEO, Calvary Health Care and Jim Birch, Chair, Little Company of Mary Health Care Limited

**We are proud of Calvary's fifth Modern Slavery Statement, in line with the *Modern Slavery Act 2018*. This statement outlines the steps we have taken to identify and mitigate the risk of modern slavery in our supply chain and operations.**

Throughout 2024, supply chain issues continued to challenge us, compounded by significant workforce shortages, which will likely remain issues for businesses over the coming years. These present a significant risk to Calvary's mission, as the products and services that support Calvary's delivery of care are often critical, and occasionally lifesaving.

Product shortages often create new modern slavery and forced labour risks for our teams to predict and manage. I am proud to summarise the key initiatives we have taken this year:

- Increased the number of staff trained in modern slavery risk management
- Built on past year's Supplier Assessment Questionnaires, and remedy pathways for suppliers, which do not meet our expectations
- Increased our level of industry coordination through our membership with ACAN.

Our Mission is to bring the healing ministry of Jesus to those who are sick, dying and in need through 'Being for others'. We maintain this year, as we have in prior years that this responsibility extends to the people who support us, in our operations and supply chain. We cannot be an organisation dedicated to healing, knowing there is an unmitigated risk of possible harm to people working in our supply chains.



Martin Bowles, National CEO,  
Calvary Health Care



Mr Jim Birch AM, Chair,  
Little Company of Mary Health Care

This Modern Slavery Statement has been approved and endorsed by Little Company of Mary Health Care Limited Board of Directors as defined by the Modern Slavery Act 2018 (Cth) ("the Act") on 26 June 2025 and is for the period 1 January 2024 to 31 December 2024. This modern slavery statement is signed by a responsible member of the Board of Directors as defined in the Act.

**Mr Martin Bowles AO PSM**  
National CEO, Calvary Health Care

**Mr Jim Birch AM**  
Chair, Little Company of Mary Health Care







# Reporting Criteria 1: About Calvary

## About Us

Calvary has provided healthcare to the most vulnerable Australians, including those reaching the end of their life, since the arrival in Australia of the Sisters of the Little Company of Mary in 1885. We are a charitable Catholic not-for-profit organisation and during 2024 we operated across five states and two territories in Australia with 13 public and private hospitals, 62 residential aged care homes, 17 retirement living villages, and 17 home care service centres.

The Spirit of Calvary expresses how we care for each other, and how we care for our patients, our residents and our clients by 'Being for Others'.

- Everyone is welcome
- You matter. We care about you.
- Your family, those who care for you, and the wider community we serve, matter.
- Your dignity guides and shapes the care we offer you.
- Your physical, emotional, spiritual, psychological and social needs are important to us.
- We will listen to you and to those who care for you.
- We will involve you in your care.
- We will deliver care tailored to your needs and goals.
- Your wellbeing inspires us to learn and improve.

## Our Vision and Values

As a Catholic hospital, home care and aged care provider, our vision is to excel, and to be recognised as a continuing source of healing, hope and nurturing to the people, and communities we serve. We bring the healing ministry of Jesus to those who are sick, dying and in need through "Being for others":

- In the Spirit of Mary standing by her Son on Calvary; through the provision of quality, responsive and compassionate health, community and aged care services; based on Gospel values; and in celebration of the rich heritage and story of the Sisters of the Little Company of Mary.

Our Values are visible in how we act and treat each other. We are stewards of the rich heritage of care and compassion of the Little Company of Mary. We are guided by the values of Hospitality, Healing, Stewardship, and Respect.

## Our Approach

Our approach to modern slavery is grounded in our understanding of human dignity, in our understanding of the value of human work, of justice, and the respect of human rights. The Church teaches us of the sanctity of human life, that each person is precious, and that we all have a responsibility to fight against the violation and degradation of our brothers and sisters. We believe that modern slavery rejects this principle and shows instead a contempt for human beings. For this reason, elimination of this scourge is a present concern of the Catholic Church and, therefore, of Calvary.

Consistent with our values of Hospitality, Healing, Stewardship and Respect, Calvary is committed to upholding human rights, not only with respect to its own employees, and the people we engage with daily, but also for the workers in our operations and supply chain. We believe our responsibilities as a Catholic, charitable organisation focussed on delivering the best possible care, extend to victims of modern slavery, who may exist in our supply chains and operations.

This approach is enforced by our Ethical Sourcing Policy, Code of Business Practice, and our Business Partner's Criteria, which extend throughout the business to staff and suppliers.







# Reporting Criteria 2: Operations and Supply Chain

## Our Organisational Structure

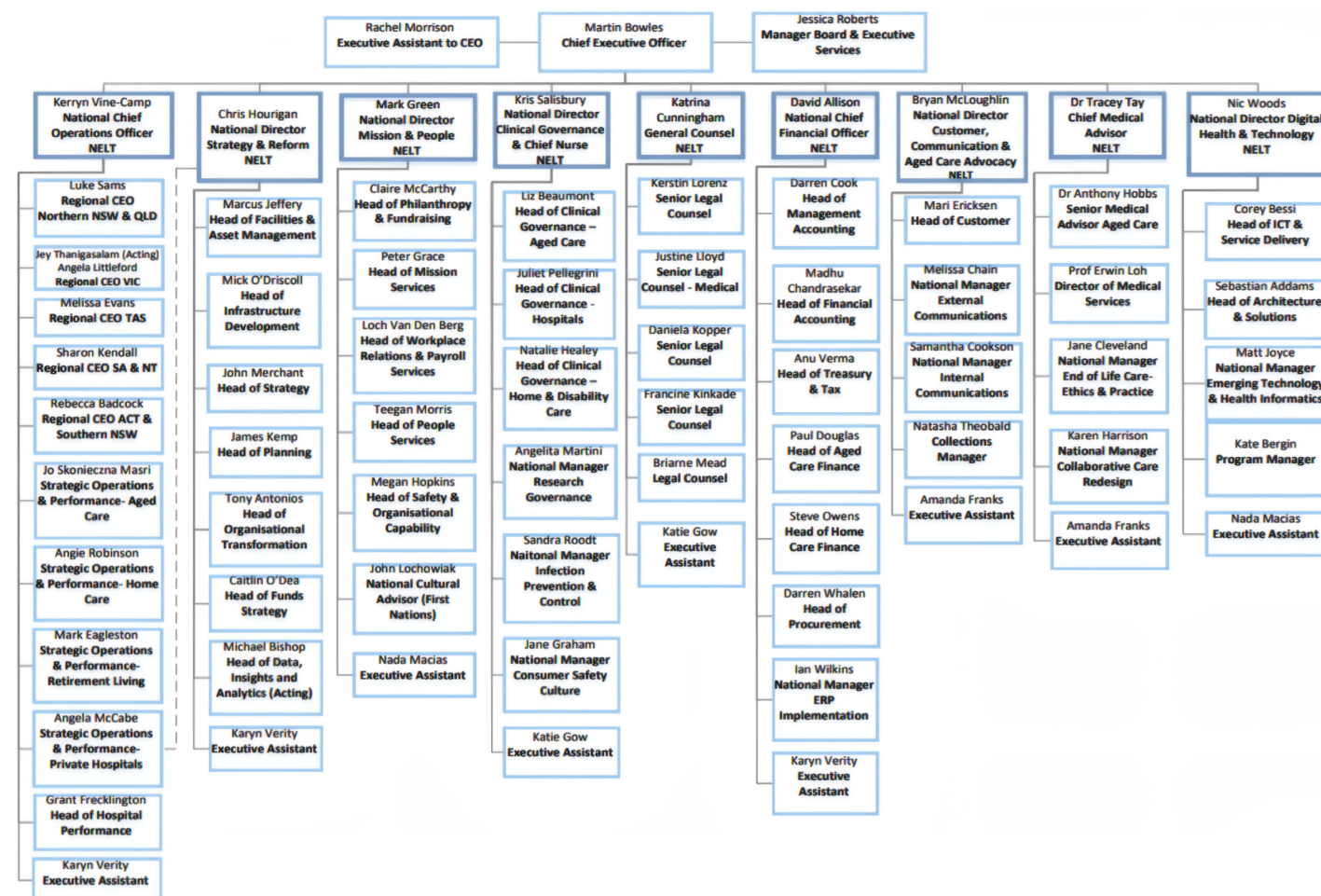
Little Company of Mary Health Care Limited (LCMHC) and its subsidiaries (trading as Calvary Health Care) are charitable not-for-profit public companies limited by guarantee, registered under the Corporations Act 2001.

Calvary's Board of Directors is chaired by Mr Jim Birch AM. Calvary Ministries exercises a stewardship role over the health, aged and community care programs and services conducted by LCMHC and its subsidiaries, to improve the health and wellbeing of the communities they serve. Details of Calvary Ministries and our Board of Directors can be found on our website.

Our National Executive Leadership Committee, under National CEO, Martin Bowles AO PSM, oversees Calvary's strategic intent, and delivers on Calvary's mission of "Being for others".

Calvary operates as a parent company, with hospitals, residential aged care, retirement living and home care services as controlled entities.

### ORGANISATIONAL CHART – NATIONAL EXECUTIVE LEADERSHIP TEAM (NELT)







## Our Operations

Calvary operates 13 public and private hospitals, 62 residential aged care homes and 17 retirement living villages, and a national network of 17 home care service centres around Australia. Calvary's head office is located at Level 15 - 345 George Street, Sydney, New South Wales 2000. With a team of more than 17,461 employees, in 2024 Calvary had 219,758 hospital admissions, conducted 143,077 surgical procedures, provided home care services to 18,598 clients and provided 5.7 million hours of care to aged care residents. In 2024, revenue from our operations was \$2,114,096.

Calvary has three public and ten private hospitals providing acute and sub-acute care. Our hospitals cover a broad geographical footprint across Victoria (Vic), Tasmania (Tas), South Australia (SA), New South Wales (NSW) and Australian Capital Territory (ACT). Calvary Home Care has been supporting people in their own homes and communities for more than 20 years in Vic, Tas, SA, Northern Territory, NSW, and ACT. We deliver a range of aged care, disability and other support services enabling independence, improved social connections and promote positive health and wellbeing. Calvary Residential Aged Care provides quality care and services within a supportive environment where residents are respected for their individuality.

To resource the many areas of our business, our direct supply chain consists of a range of large multinationals and small, local businesses, which provide our services with medical and surgical supplies, pharmaceuticals, energy, food and beverages, and information and communication technology (ICT) hardware and software.

A significant focus over the reporting period has been the continued incorporation of the "new Calvary" homes into the Calvary business. The additional homes were successfully acquired in 2021, with ongoing review and consolidation into the supply chain.

**Appendix 1:** Calvary Company Entity List

**Appendix 2:** Calvary Service Location Map

## Our Governance Framework

As a provider of health care to the Australian community, Calvary operates under a strong corporate governance framework, underpinned by our mission and values. During the 2024 reporting period, Calvary's modern slavery initiatives were overseen by the National Director of Mission & People, reporting to the LCMHC Board, through the National Executive Leadership Committee. Under their guidance, the team ensures that skills and resources can be accessed throughout the business, such as human resources, procurement, legal, and training and development teams.

In 2018, Calvary established a modern slavery steering committee, with representation strategically selected from a cross-section of business units, which were well-positioned to enable rapid changes to policy, process, and mandated activities. The steering committee developed non-negotiable criteria for business partners, which were approved by the Board in 2018.

During the 2024 reporting period, Calvary's modern slavery initiatives were supported by the People, Values, Communications, and Culture Committee (PVCCC), with regular communications being produced for this group. The PVCCC advises on embedding Calvary's mission, vision and values into its strategic focus, leadership, and organisational behaviours, and took a special interest in advancing modern slavery and human rights issues within the Calvary business. In addition to this critical group, Calvary's Finance, Performance, and Risk Committee, along with Mission and Ethics Committee of the Board, provided guidance and feedback to strengthen the governance process.

## Workforce Profile

Calvary takes pride in our commitment to be an equal employment opportunity provider, encourage workplace diversity and continue to promote equity, transparency, efficiency and a non-discriminatory approach to the recruitment, selection and appointment of staff.

Calvary directly employs the majority of our workforce, which significantly reduces the risk of modern slavery within our operations. However, we occasionally engage third-party labour hire. To further strengthen our commitment to ethical labour practices, we intend to introduce a Managed Service Provider (MSP) in 2025. This initiative aims to enhance oversight and reduce the risk of modern slavery within our third-party labour arrangements. As of December 2024, Calvary has 17,461 employees. Of our staff, 13,918 are female, making up approximately 80 per cent of our workforce.

Calvary’s recruitment and hiring policies are governed by our Recruitment, Selection and Appointment Procedure. This policy outlines responsibilities of hiring managers who are supported by a strong Talent Acquisitions team.

## Our Supply Chain

As a multi-faceted healthcare organisation operating throughout Australia, our supplier base is diverse and ranges from large multi-national organisations with highly diverse supply chains through to sole traders delivering site specific services.

During the 2024 reporting period, Calvary transacted with 6,051 suppliers.

We procured goods and services in the following primary spend categories:

INDIRECT	DIRECT
Recruitment and Agency	Drugs and Pharmaceutical Services
Professional Services	Clinical Services (e.g. Pathology, Allied Health)
Facilities Management	Major Medical Equipment
ICT	Medical and Surgical Supplies
Logistics	Prosthetics

Calvary’s expenditure on externally sourced goods and services in 2024 was more than \$1.057 billion, which is managed by National Procurement.

To effectively manage security of supply, Calvary operates a “multi-region multi-supplier sourcing strategy”. This strategy, in conjunction with the broad and sensitive range of medical consumables required for our day-to-day operations, dictates that we engage with suppliers both locally and internationally. Manufacturing facilities for the goods used in our daily operations are heavily concentrated in China, Europe, and the United States.





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

**We believe the importance of a modern slavery program extends beyond an organisation's legal accountabilities. Ensuring that modern slavery does not exist in our supply chain or operations aligns with our core values and mission as a care-giving organisation.**

In 2024, our efforts continued to be focused on fostering a transparent and collaborative relationship between our organisation and our suppliers, educating our staff to understand and recognise the risks, and building systems and processes to allow for the reporting and escalation of any suspected or observed risks.

In the 2024 reporting period, Calvary renewed our membership of ACAN. We believe that combining our efforts with other like-minded organisations in the health and ageing sector will deliver the greatest impact in the shortest time.

Our continuous supplier heat map exercise and supply chain investigations that we conducted with ACAN have enabled us to identify key risks and areas of focus, develop an effective response and build plans for the future; which are contained in this report.

## Operational Risk

Calvary provides a diverse range of services to patients, residents and clients, where consumer and clinical choice is often a factor in procurement decision making. As a result, we recognise that the risk of modern slavery is something that occurs in our operations and supply chain. We work to proactively identify and mitigate these risks through a program outlined in this statement.

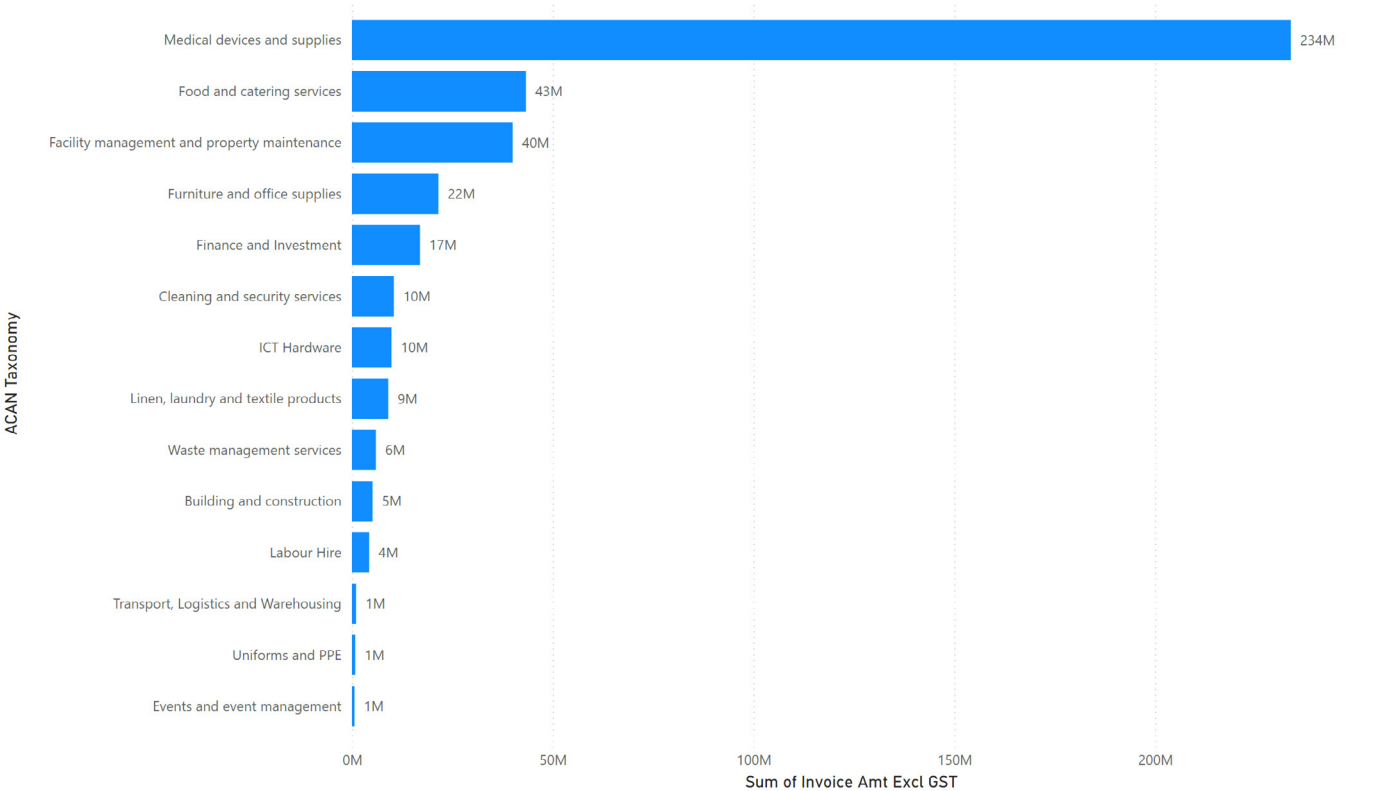
In line with best practice, Calvary with the support of ACAN, is committed to continuously improving our maturity across governance, risk management and risk assessment by identifying strengths and opportunities in Calvary's approach.

## Supply Chain Risk

The ACAN Health Working Group was established to coordinate the effort across all hospitals and aged care providers in ACAN. Throughout 2024, we continued to work together to understand where our supply chains overlap. The plan is to start engaging high-risk suppliers, where more than one ACAN entity is procuring product and/or services to leverage our joint scale. Importantly, this work is pre-competitive, and no information about individual pricing or volume is shared. All information is held and analysed by ACAN, not individual entities.

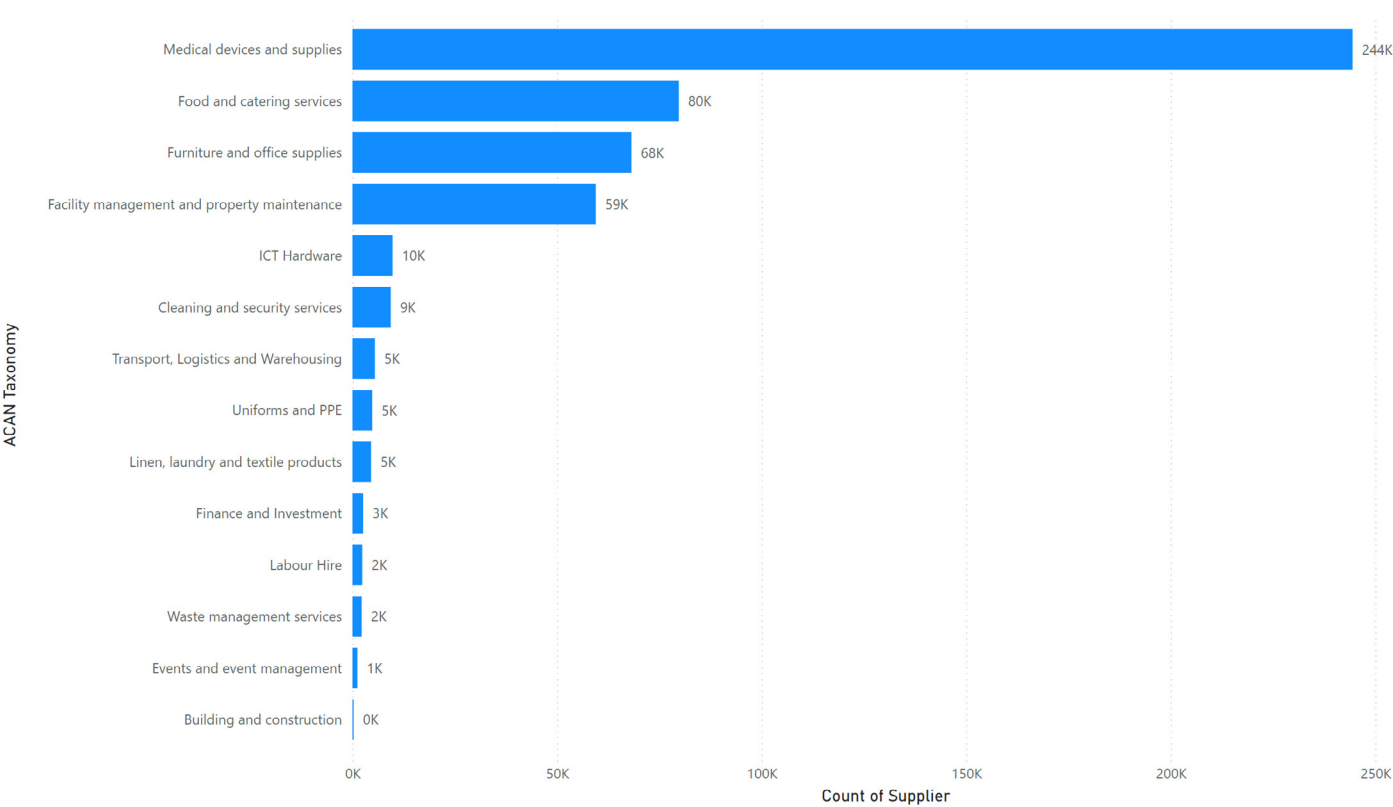
GRAPH: SPEND IN HIGH-RISK TAXONOMY CATEGORIES

Sum of Invoice Amt Excl GST by ACAN Taxonomy



GRAPH: NUMBER OF SUPPLIERS IN HIGH-RISK PROCUREMENT CATEGORIES

Count of Supplier by ACAN Taxonomy





# Reporting Criteria 4: Actions Taken to Assess and Address Risk

**Calvary's modern slavery risk management initiatives can be split into three broad categories:**

- Risk identification and mitigation in our internal operations and supply chain.
- Staff awareness through education and training.
- Demonstrating our commitment through internal policies and procedures.

## Increasing Awareness

Calvary has continued to implement mandatory training for procurement staff and those involved in supplier relationship management. The Modern Slavery 101 module provides an overview of what is defined as modern slavery, who is at risk and where it is most likely to occur in our supply chains and operations.

A key achievement was the substantial increase in staff training, with 250 employees completing e-learning modules, up from zero in the previous year. This effort was complemented by a notable rise in the number of e-learning modules completed, from 34 to 250.

## Supplier Engagement via the ACAN Program

The ACAN Program provides structured support for supplier engagement and supply chain risk assessment. Updated in 2023, the program now includes enhanced supplier education and auditing components, and continues to evolve in response to emerging risks and best practices.

Entities are encouraged to refer to the official ACAN website for comprehensive information: <https://www.acan.org.au/>.

## Self-Declarations

The ACAN Supplier Survey and Sedex SAQ are used to:

- Identify suppliers willing to join ACAN's modern slavery supplier program.
- Determine key modern slavery contacts within the supplier's business.
- Understand business structures.
- Support desktop reviews, audits, and due diligence.
- As a combined data set, the SAQs identify gaps in knowledge, understanding, and controls in supply chains, guiding additional tools and resources for Catholic entities and their suppliers.

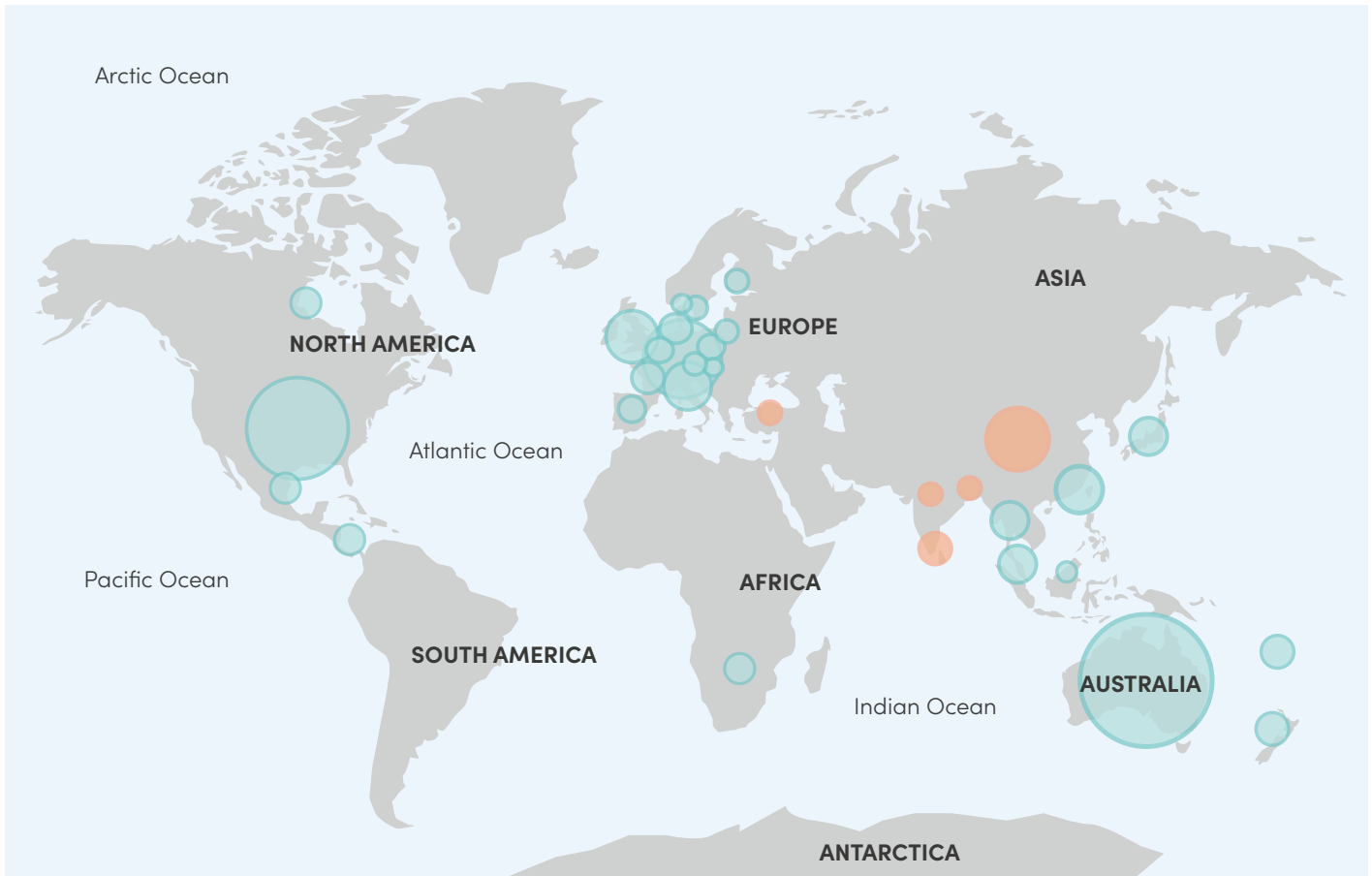
In 2024, procurement completed the risk taxonomy assessment for 6051 suppliers, with 454 supplier surveys completed, 72 suppliers joining capacity building webinars, 125 suppliers joining Sedex and 72 sites completing Sedex SAQ.

Through the ACAN supplier survey, 464 of our suppliers of goods have declared sourcing from 34 countries, including five countries with an inherent high risk according to the Sedex Pre-assessment Tool. This highlights the need for enhanced due diligence, targeted supplier engagement, and ongoing monitoring to mitigate modern slavery risks. These suppliers may be prioritised for audits, training, and closer collaboration to ensure ethical sourcing practices and compliance with legal obligations.

**SOURCING COUNTRIES AS DECLARED BY TIER 1 SUPPLIERS:**

Count of Business Number by In which Country or Countries are the good(s) made (i.e., where are your Tier 1 suppliers located) and Overall inherent risk category

Overall inherent risk category    ● high    ● medium





## DATA:

IN WHICH COUNTRY OR COUNTRIES ARE THE GOOD(S) MADE (I.E., WHERE ARE YOUR TIER 1 SUPPLIERS LOCATED)	COUNT OF BUSINESS NUMBER	OVERALL INHERENT RISK CATEGORY
Australia	171	medium
Austria	5	medium
Bangladesh	2	high
Belgium	4	medium
Canada	3	medium
China	25	high
Costa Rica	1	medium
Denmark	5	medium
Fiji	1	medium
Finland	1	medium
France	11	medium
Germany	39	medium
India	2	high
Italy	13	medium
Japan	3	medium
Lithuania	1	medium
Malaysia	1	medium
Mexico	4	medium
Netherlands	2	medium
New Zealand	5	medium
Norway	1	medium
Poland	1	medium
Singapore	3	medium
Slovakia	1	medium
South Africa	1	medium
Spain	2	medium
Sri Lanka	3	high
Sweden	2	medium
Switzerland	5	medium
Taiwan	12	medium
Thailand	3	medium
Turkey	2	high
United Kingdom	26	medium
United States	103	medium

Calvary has continued to communicate with all current suppliers on the steps we undertake to ensure we meet, and where possible exceed, our obligations with regard to modern slavery legislation.

Calvary has notified all suppliers of our expectations of them, as our partners, in supporting our efforts in addressing this issue including adhering to our Business Partner’s Criteria and Ethical Procurement Policies and maintaining open and honest communications with us on this matter.

Calvary joined Sedex via ACAN during the reporting period. 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, and vice-versa.

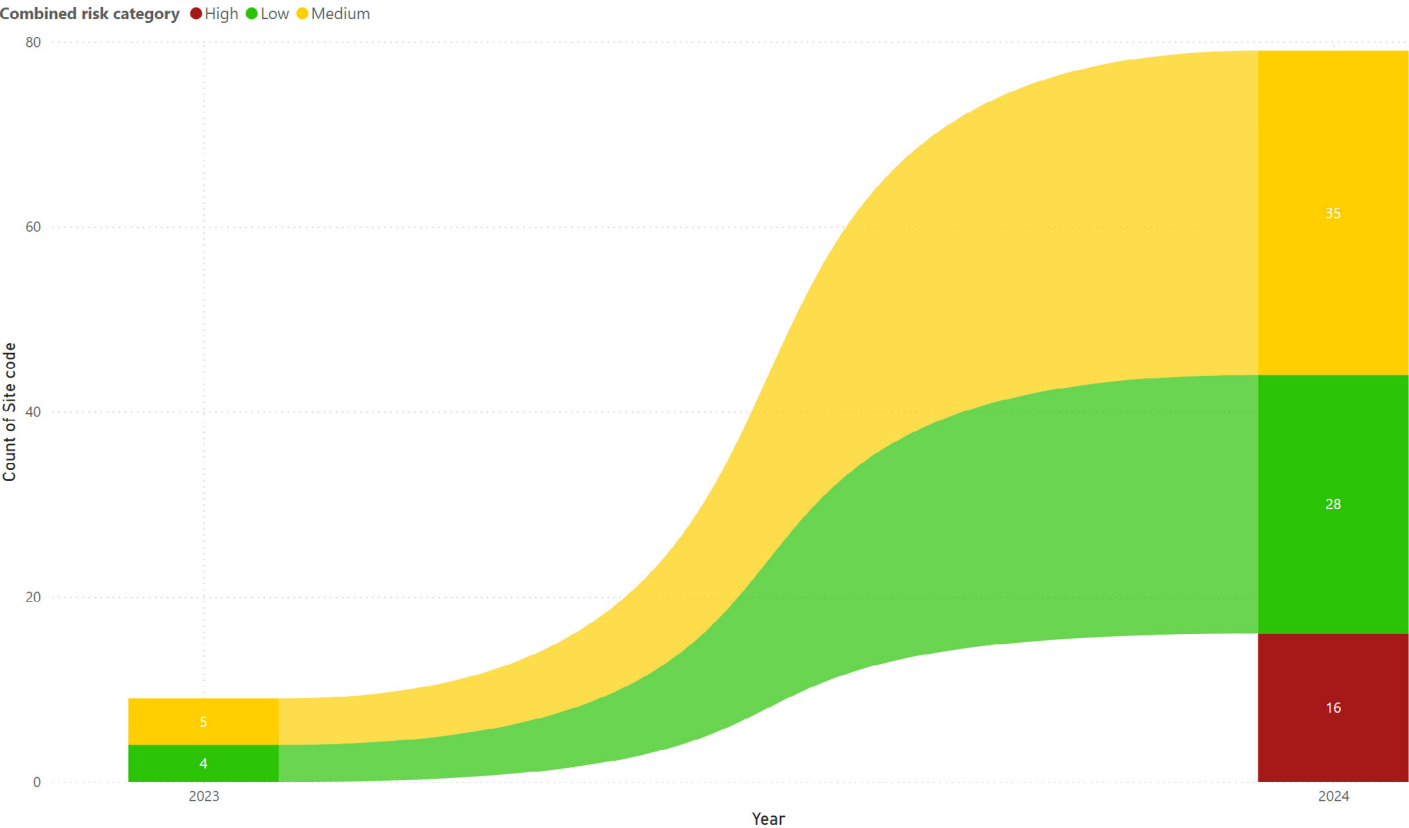
Calvary invited high-risk / high-volume suppliers for on-boarding to the Sedex platform. Once invited to join the platform as a supplier of Calvary, the suppliers fill in the SAQ, and a risk score is produced (site characteristics risk score).

Moving forward, Calvary plans to use Sedex to:

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

In 2024, 72 of our supplier’s sites have completed the Sedex SAQ, bringing the total of assessments completed to 88. Seven of these sites have a high-risk inherent and site practices score and, together with suppliers sourcing from high-risk countries, will be included in our 2025 desktop review activities.

SEDEX SAQ COMPLETED



## Our People

Calvary's third-party labour hire contracts have been updated to include modern slavery risk management requirements.

Calvary maintained our policies on modern slavery and ethical sourcing including:

- Business Partner's Criteria.
- Ethical Sourcing Policy.
- Code of Business Practice.
- Declarable Minerals List.

Calvary requires all new contracted suppliers to agree to our Business Partner's criteria to be considered as a supplier to Calvary.

## Sector Collaboration

As a member of the ACAN, Calvary has actively participated in joint activities with other Catholic organisations including the sharing of non-commercial information and analytics as part of a sector wide response to modern slavery.

Calvary is also a member of the Catholic Negotiating Alliance (CNA) and issued supplier self-assessments to our joint top-30 high risk suppliers.

Calvary continues to work with other CNA members to address any identified risks.

In 2024, the Hospitals Working Group commenced joint Desktop Reviews to enhance supplier engagement and management of modern slavery risk. The model introduced a clear review layer between supplier self-assessment and action planning to make supplier responses robust, risk-based, and outcome-driven, enhancing worker protection. The Desktop Review process validated supplier responses, resolved inconsistencies, identified areas of high-risk, and enabled co-design of the next steps with the aim of strengthening worker protection.

## Case Study: Desktop Review Key Findings and Results

The Desktop Reviews identified:

- Inconsistent reporting on the use of indirect labour: with undertakings to clarify labour hire practices and put in place appropriate protections for workers.
- High-risk product and service categories being determined: with suppliers being requested to outline risk reduction measures and make inclusion of workers' rights contractual.
- Gaps in governance and public disclosures: with suppliers being requested to update documentation to include current anti-modern slavery requirements and make verification of training data and due diligence outcomes available.

While grievance mechanisms were in place, their effectiveness was in doubt, and this led to calls for improved metrics and access.

Inconsistencies in remediation procedures were addressed through dialogue, and this led to commitments to develop or update frameworks to improve access and effectiveness of remediation.

### Next Steps and Ongoing Improvement Actions

Following the Desktop Reviews, suppliers were requested to:

- Clarify high-risk practices.
- Increase worker participation through voice programs and grievance access.
- Improve metrics and reporting on the success of actions implemented.
- Increase transparency and public disclosure to make sure that practices inside and public statements are consistent.

Ongoing collaboration in 2025 between suppliers and Catholic hospitals will focus on long-term, sustainable capacity building and knowledge-sharing centred on risk mapping. The Desktop Reviews offered constructive dialogue and tailored subsequent steps. This resulted in a better mechanism for managing risks of modern slavery, keeping workers' interests at the centre of approved activities.



## Case Study: Capacity Building in Social Compliance Auditing

In May 2024, a Calvary procurement officer, along with other supply chain practitioners and business partners such as SEDEX, completed a four-day Compliance Practitioners Initiative (CPI) Social Compliance Lead Auditor training course.

The CPI is a global qualification scheme tailored for supply chain practitioners across various industries and functions. The Social Compliance Lead Auditor accreditation equips Calvary with the expertise to perform both desktop and in-person social compliance audits of suppliers. This training is also recognised by the Association of Professional Social Compliance Auditors (APSCA).

Intertek, a renowned provider of quality assurance, testing, inspection, and certification, delivered the course. The training emphasised corporate social responsibility (CSR) audits, which are increasingly vital in the global supply chain. Participants gained skills to systematically and comprehensively evaluate CSR issues, including:

- Understanding CSR programs, their history, and significance.

- Grasping the CSR audit process, types of audits, auditor professionalism, safety, and security.
- Learning the components of CSR audits and common audit standards.
- Mastering the audit process, including preparation, opening and closing meetings, social management systems, business ethics, site tours, interviews, and reviews of worker records and payroll.
- Developing interview and worker file review sampling techniques.
- Handling special situations and sensitive cases.
- Applying risk management techniques.
- Writing CSR audit reports and corrective action plans.

After the course, the Calvary Procurement team, in collaboration with the Talent Solutions team, applied their new skills by conducting a desktop audit of labour hire service providers and sponsorship arrangements for vulnerable migrant workers in aged care. These areas continue to be monitored and managed to mitigate associated risks.

## Remediation

Calvary is committed to providing appropriate and timely remedies for individuals impacted by modern slavery, in alignment with the UN Guiding Principles on Business and Human Rights, the Australian Modern Slavery Act 2018 (Cth), and other relevant legislation. Where Calvary is found to have caused or contributed to harm, it will cooperate in remediation efforts and take steps to prevent recurrence.

Where Calvary is directly linked to modern slavery through a business relationship, it is committed to working with the entity responsible to ensure effective remediation and prevent future harm.

Calvary has access to Domus 8.7 (<http://domus87.org.au/>), a not-for-profit initiative that provides independent, victim-centred remediation services and confidential advisory support. Domus 8.7 plays a key role in supporting organisations to respond to modern slavery incidents and uphold human rights.

Calvary has also implemented the following measures:

- Training staff and stakeholders to recognise the causes of modern slavery and understand how to escalate concerns such as poor labour practices, unsafe working conditions, and other risk indicators.
- Including remediation clauses in contracts with high-risk suppliers to ensure victim-centred processes are followed.
- Establishing protocols for engaging Domus 8.7 and law enforcement when modern slavery concerns are raised.

# Reporting Criteria 5: Effectiveness Assessment

**We are continuously monitoring our progress against our commitments in 2024, as well as identifying new opportunities to improve our modern slavery program.**

In 2024 we met all targets as detailed in this report, including:

- Calvary extended direct invitations to 89 suppliers to join Sedex. 125 suppliers have joined Sedex through our collaboration in the ACAN Health Working Group. This is because overlap in the supplier base has been identified resulting in additional suppliers, already on Sedex, being linked to us.
- A total of 72 suppliers have completed the Sedex SAQ, a substantial increase from just 16 the previous year.
- Calvary will monitor this in the future, using the ACAN risk taxonomy for those who do not engage, and complete further steps as requested.

Using the ACAN risk taxonomy, Calvary has identified 3,771 suppliers as having an inherent 'high' risk rating. We recognise this as an initial assessment and will continue to validate and refine this classification over time. In 2025 and future years, we will be establishing milestones centred around:

- Percentage of staff who have completed mandatory training.
- Number of supplier audits conducted.
- Number of supplier remediation programs completed

While we recognise the need to develop and evolve our targets and measurements, in 2024 we have taken steps to enhance our metrics (as seen in the Supply Chain Risk section of this statement).

We can provide the following data as a baseline for further reporting:

FOCUS	DESCRIPTION	2023	2024
Internal	Hours spent on Modern Slavery Activities	242 hours	300 hours
	eLearnings completed	56	250
External	Total number of suppliers	6,183	6,051
	Total number of high-risk suppliers	5,854	3,771
	Invited to join Sedex	38	89
	Joined Sedex	60	125
	Suppliers completing Sedex risk assessment SAQ	16	72
	Suppliers attending training	437	72
	Social audits (Supplier site audit)	6	18

## Modern Slavery Maturity Assessment

In 2024, Calvary partnered with ACAN to review maturity of its own organisation through the ACAN Maturity Assessment. The Assessment looks to shift from the initial Gap Analysis towards a focus on the maturity of Calvary's modern slavery risk management approach aiming for continuous improvement.

This transition underscores the importance of assessing the maturity of our approach to drive the impact against modern slavery. The maturity scorecard is designed to provide a comprehensive view of Calvary's efforts across different key areas of operation, presented as pillars:

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

In line with best practice and reporting requirements, we measure the maturity across governance, risk assessment, risk management, and effectiveness measures.

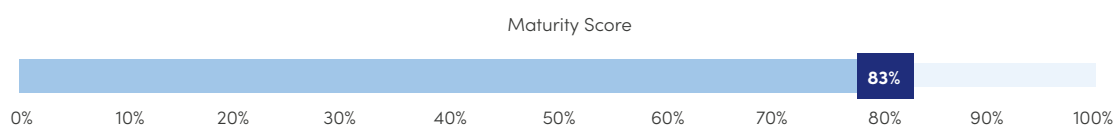
This evaluation helps identify strengths and weaknesses in our approach, across the four areas, presented as sub-pillars:

- **Governance:** Sets the framework for our work, with mature governance characterised by strong policies and processes, guided by oversight and accountability.
- **Risk assessment:** Identifies potential at-risk-areas in our operations and supply chain, upon which Calvary can act. A mature risk assessment involves continuous monitoring and collaboration and allowing for the prioritisation of resources and mitigating actions.
- **Risk management:** Evaluate how well Calvary apply the mitigation actions, with mature efforts being proactive and adaptable to changing circumstances and driving measurable impact.
- **Effectiveness:** Measures the impact of our anti-slavery efforts and it is what holds us accountable.

While many such metrics are proxy-measures, a mature approach is one that provides a basis for ongoing improvement, ensuring efforts are impactful and contribute meaningfully to eradicating slavery.

Calvary will develop an action plan based on the initial findings for each pillar and look to set SMART (Specific, Measurable, Achievable, Relevant, Time-bound) objectives to guide further improvements for 2025 to Calvary's Modern Slavery program.

### LITTLE COMPANY OF MARY HEALTH CARE LIMITED - OVERVIEW



### LITTLE COMPANY OF MARY HEALTH CARE LIMITED - 2024 ANALYSIS BY PILLAR

PILLAR	A. GOVERNANCE	B. RISK ASSESSMENT	C. RISK ASSESSMENT	D. EFFECTIVENESS OF ACTIONS	MATURITY SCORE
1. Business Process and Governance	100%	100%	80%	100%	95%
2. Operations	72%	100%	85%	85%	86%
3. Supply Chain	100%	100%	85%	100%	96%
4. Workers Engagement	54%	100%	50%	48%	63%
5. Entity's program and activities	100%	80%	100%	53%	83%
6. Grievance Mechanisms and Remediation	100%	60%	78%	67%	76%
<b>Average</b>	<b>88%</b>	<b>90%</b>	<b>80%</b>	<b>76%</b>	<b>83%</b>



## Our Plans for 2025

In 2024, we have been building our automation capabilities, which offer much stronger tracking and data. This includes:

- Continuation of our long-term road map, to strengthen our risk management of our supply chains.
- We plan to substantially increase our ability to survey suppliers, through automation, allowing us to build a much stronger picture of our risk.
- Expanding our program with a greater number of our suppliers who operate in high risk sectors, and bring in new suppliers in Sedex.
- Continue with the development of a whistle-blower hotline for workers, contractors, and sub-contractors.
- Building our staff awareness initiatives, through additional training and materials, particularly on grievance mechanisms and remedy pathways.
- Continuously review the effectiveness of our actions in addressing the risk of modern slavery.

Beyond 2025, Calvary is committed to continuously improving our due diligence in modern slavery risk management. We will encourage our suppliers to enhance their risk management programs and conduct random audits of high-risk suppliers to ensure compliance with our modern slavery policies. Our efforts to map our supply chain will be expanded, allowing us to update our risk profiles and adjust our modern slavery program accordingly.

Additionally, we will implement the CIA Supplier Module—an online platform that integrates our governance processes directly into supplier onboarding and management. This tool will enable us to systematically assess and monitor supplier risk, including modern slavery indicators, while also streamlining the onboarding process. By capturing a broader range of suppliers through this platform, we aim to enhance transparency, improve compliance, and strengthen our overall risk mitigation efforts.

To support these initiatives, ACAN updated all modern slavery training modules to include the latest information on modern slavery risks, signs to look for, and best practices for mitigation. The training is more streamlined, with feature interactive elements such as quizzes and scenario-based learning to enhance engagement and retention. It will be accessible on Calvary's Learning management System (LMS) with recommendation for MS 101 as a general learning for all staff and volunteers.

The other three modules are designed for targeted staff on the Modern Slavery Working Group, senior leaders and board members. This way, there is clarity around modern slavery risks and actions to support Modern Slavery Act compliance. Regular refresher courses will be implemented to ensure that everyone remains up-to-date with the latest developments and best practices in modern slavery risk management.

By implementing these comprehensive plans and updating our training modules, Calvary aims to lead the way in ethical sourcing and modern slavery risk management beyond 2025. We will continuously monitor adherence to our ethical sourcing policy, providing regular reports on our progress to ensure transparency and accountability.

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

**The LCMHC Board is the single Board which governs all entities, owned and controlled. Similarly, the National Executive Leadership Committee manages all entities, owned and controlled with the support of Regional CEOs, to whom all owned and controlled service level executives report.**

As the reporting entity, Calvary has developed policies, procedures and mandatory training and education materials for use by all Calvary entities. These were developed in consultation with all entities to ensure the highest level of adoption and compliance.



## Reporting Criteria 7: Any Other Relevant Information

**Since 2019, Calvary has been a member of the ACAN. Along with the network, we have contributed to a wider risk management process across multiple industries.**

We are continuing with our membership of ACAN in 2025, as addressing the risk of modern slavery involves long-term commitment.





# Appendices

## Appendix 1: Calvary Company Entity List as at 31 December 2024

COMPANY	ACN	ABN
Calvary Home Care Services Limited	118 225 559	44 118 225 559
Calvary Bruce Private Hospital Limited	129 801 378	67 129 801 378
Calvary Health Care Tasmania Limited	129 926 790	29 129 926 790
Calvary Health Care ACT Limited	105 304 989	74 105 304 989
Calvary Health Care Bethlehem Limited	105 303 704	81 105 303 704
LCM Calvary Health Care Holdings Limited	105 355 306	22 105 355 306
Calvary Health Care Sydney Limited	105 757 453	95 105 757 453
Calvary Health Care Riverina Limited	105 810 688	45 105 810 688
Calvary Retirement Community Ryde Limited (not active)	105 898 173	40 105 898 173
Little Company of Mary Health Care Limited	079 815 697	11 079 815 697
Calvary Private Health Care Canberra Limited	121 852 088	83 121 852 088
Calvary Health Care Adelaide Limited	106 314 229	85 106 314 229
Calvary Retirement Community Canberra Limited (not active)	106 452 402	17 106 452 402
Calvary Retirement Communities Limited	102 625 212	34 102 625 212
Calvary Health Care (Newcastle) Limited	081 149 126	75 081 149 126
Calvary Mary MacKillop Care SA Limited (not active)	052 973 387	83 052 973 387
Japara Healthcare Limited	168 631 052	54 168 631 052
Calvary Holdings Pty Ltd	110 466 889	18 110 466 889
Japara Property Holdings Pty Ltd	166 991 984	18 166 991 984
Japara Property Management Pty Ltd	113 425 086	53 113 425 086
Japara Developments Pty Ltd	110 645 773	92 110 645 773
Aged Care Services 39 (Noosa) Pty Ltd	009 991 020	76 009 991 020
Calvary Aged Care Services Pty Ltd	110 140 157	72 110 140 157
Calvary Retirement Living Pty Ltd	123 407 509	48 123 407 509
Calvary Administration Pty Ltd	110 281 760	32 110 281 760
Japara Home Care Pty Ltd	610 327 261	52 610 327 261
JD No. 3 (Lakes Entrance) Pty Ltd	122 943 408	52 122 943 408
JD No. 5 (Albury & District) Pty Ltd	120 220 313	16 120 220 313
Calvary Retirement Living 2 (Balmoral Mews) Pty Ltd	123 447 245	57 123 447 245
Calvary Retirement Living 4 (Cosgrove Cottages) Pty Ltd	123 447 263	61 123 447 263
Calvary Retirement Living 5 (Sydney Williams) Pty Ltd	123 790 358	66 123 790 358
Calvary Retirement Living 6 (Barongarook) Pty Ltd	127 055 565	90 127 055 565
Calvary Retirement Living 7 (The Homestead) Pty Ltd	131 357 983	18 131 357 983

## Appendix 2: Calvary Service Location as at 31 December 2024



**ACT**

- Calvary ACT Service Centre, Bruce
- Calvary Bruce Private Hospital, Bruce
- Calvary Haydon, Bruce
- Calvary John James Hospital, Deakin

**NSW – Albury**

- Calvary Albury & District, Glenroy

**NSW – Greater Sydney**

- Calvary Brighton-Le-Sands, Brighton-Le-Sands
- Calvary Corymbia, Belrose
- Calvary Health Care Kogarah, Kogarah
- Calvary Henley Manor, Doonside
- Calvary Ryde, Ryde
- Calvary Sydney Service Centre, Beverley Park

**NSW – Hunter/Newcastle**

- Calvary Cessnock, Cessnock
- Calvary Chiara Respite Cottage, Lakelands
- Calvary Cooina, Singleton
- Calvary Ephesus, Lambton
- Calvary Hunter Service Centre, Warrabrook
- Calvary Mid North Coast Service Centre, Forster
- Calvary Mater Newcastle, Waratah
- Calvary Mt Carmel, Maitland
- Calvary Muswellbrook, Muswellbrook
- Calvary Nazareth, Belmont North
- Calvary St Francis, Eleebana
- Calvary St Luke's, Cooks Hill
- Calvary St Martin de Porres, Waratah
- Calvary Tanilba Shores, Tanilba Bay
- Calvary Tours Terrace, Hamilton

**NSW – Mid North Coast**

- Calvary St Joseph's, Sandgate
- Calvary St Paul's, Cundletown
- Calvary Star Of The Sea Respite Cottage, Forster
- Calvary The Brelsford, Coffs Harbour
- Calvary The Mariner, South West Rocks

**NSW – Riverina**

- Calvary Riverina Hospital, Wagga Wagga
- Calvary Riverina Service Centre, Wagga Wagga

**NT**

- Calvary Darwin Service Centre, Winnellie
- Calvary Mulakunya Flexible Aged Care Nguu, Bathurst Island

**SA**

- Calvary Adelaide Hospital, Adelaide
- Calvary Adelaide Service Centre, Adelaide
- Calvary Brighton, South Brighton
- Calvary Central Districts Hospital, Elizabeth Vale
- Calvary Flinders Far North Service Centre, Port Augusta
- Calvary Flora McDonald, Cowandilla
- Calvary Kingswood, Kingswood
- Calvary North Adelaide Hospital, North Adelaide
- Calvary Oaklands, Oaklands Park
- Calvary Port Augusta Respite Cottage, Port Augusta
- Calvary St Catherine's, Berri
- Calvary The Homestead, Walkley Heights
- Calvary Trevu House, Gawler East

**TAS**

- Calvary Cosgrove Cottages, South Launceston
- Calvary Lenah Valley Hospital, Lenah Valley
- Calvary Tasmania Service Centre, Launceston
- Calvary Riverside Views, Riverside
- Calvary Sandhill, South Launceston
- Calvary St John's Hospital, South Hobart
- Calvary St Luke's Hospital, East Launceston
- Calvary St Vincent's Hospital, Launceston

**VIC – Melbourne's West, Geelong and the Surf Coast**

- Calvary Balmoral Grove, Grovedale
- Calvary Balmoral Mews, Grovedale
- Calvary Barongarook Gardens, Colac
- Calvary Cordelia Grove, Anglesea
- Calvary Elouera, Torquay
- Calvary Roccoco, St Albans Park
- Calvary Trugo Place, Newport
- Calvary Vonlea Manor, Norlane

**VIC – South-East Melbourne**

- Calvary Kingston Gardens, Springvale South
- Calvary Melbourne Service Centre, Mulgrave
- Calvary Scottvale, Dandenong
- Calvary Springvale, Springvale
- Calvary St Jude's, Narre Warren North
- Calvary The Highbury, Glen Waverley
- Calvary The Regent, Mt Waverley
- Calvary Viewhills Manor, Endeavour Hills

**VIC – Gippsland**

- Calvary Gippsland Service Centre, Morwell
- Calvary Lakes Entrance, Lakes Entrance
- Calvary Narracan Gardens, Newborough
- Calvary Strzelecki House, Mirboo North

**VIC – Shepparton**

- Calvary Shepparton Service Centre, Shepparton

**VIC – Melbourne East**

- Calvary Health Care Bethlehem – Kooyong Precinct, Caulfield South
- Calvary Huntly Suites – Kooyong Precinct, Caulfield South
- Calvary Hyson Apartments – Kooyong Precinct, Caulfield South
- Calvary Lower Plenty Garden Views, Lower Plenty
- Calvary Millward, Doncaster East
- Calvary Rosanna Views, Rosanna
- Calvary Sydney Williams, Doncaster East

**VIC – Goldfields**

- Calvary Mirridong, Bendigo
- Calvary Goonawarra, Sunbury
- Calvary Kelaston, Wendouree
- Calvary Kirralie, Ballarat

**VIC – Bayside**

- Calvary Bayview, Carrum Downs
- Calvary Capel Sands, Capel Sound
- Calvary Elanora, Brighton
- Calvary George Vowell, Mt Eliza
- Calvary Rye Sands, Rye
- Calvary Sandhurst, Carrum Downs



**CALVARY NATIONAL OFFICE**

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*In 1885, six courageous Sisters sailed into Sydney to continue the mission of Venerable Mary Potter and the Sisters of the Little Company of Mary to care for those in need. Thus began Calvary's enduring legacy of care in Australia. Today, we continue their mission, in our hospitals, home and virtual care services, retirement living and residential aged care homes across four states and two territories.*

To view our other locations visit  
**[calvarycare.org.au](http://calvarycare.org.au)**