



2025 Modern Slavery Statement



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Board Chair message

Southern Cross Care (WA) Inc. (SCCWA) is committed to our purpose of helping people live extraordinary lives, every day, connected to communities. This extends to both our employees and our suppliers.

Through this commitment we continue our journey in continuously reviewing and updating our processes to ensure our organisation and its supply chains' activities and actions are compliant with the Modern Slavery Act 2018 (Cth) and free from Modern Slavery practices.

Our purpose and values of **I listen, I act, I don't give up, and we work as one** remain visible throughout this statement and in the actions we continue to take. We persist in laying foundations which reflect our commitment to taking meaningful action and acting with integrity to support vulnerable members of our community.

The introduction of the Vendor and Supplier Compliance Framework and communicating these changes with over 650 of our vendors demonstrates our commitment to include key stakeholders on our journey of continuous improvement and to eradicate modern slavery.

This statement is made together with other Australian Catholic organisations. SCCWA is pleased to be a part of the Australian Catholic Anti-Slavery Network (ACAN), and for our Modern Slavery Statement to form part of the ACAN's Compendium of Modern Slavery Statements.

As Chair of SCCWA, I would like to thank everyone who has helped develop this important work, from discerning the issue and our commitment to action to delivering the final statement.

I look forward to leading and supporting our ongoing efforts to eliminate modern slavery.



Tony Vis
Board Chair
Southern Cross Care (WA) Inc.



Criteria 1:

About Southern Cross Care (WA) Inc

In 1966, Southern Cross Care WA (SCCWA), formerly known as Southern Cross Homes, was created by the Order of the Knights of the Southern Cross, who were committed to improving the lives of their fellow Western Australians.

Today, 60 years on, that commitment remains strong, and SCCWA remains a purpose-driven, not-for-profit organisation, providing residential aged care, retirement living, respite, home-based care, health and wellness services, mental health and disability support, and social housing through Southern Cross Housing.

At SCCWA our people are at the heart of everything we do, and we are proud to deliver care to over 3,000 Western Australians. With more than 1,000 employees and 170 volunteers, our teams dedicate their days to helping people live extraordinary lives, every day, connected to communities.

Our purpose

People live extraordinary lives, every day, connected to communities.

Our vision

Transforming our sector and the experiences of the people we care about.

Our values

Our values guide how we live and work, day-to-day. They define how we behave towards each other and the attributes we recognise and celebrate. Our values take the normal to memorable and set a shared standard for how we care for others, now and in the years to come.

All of our people operate from a core belief that “I enable the extraordinary because”:



I listen



I act



I don't give up



We work as one

This is our promise to our clients, residents and each other.

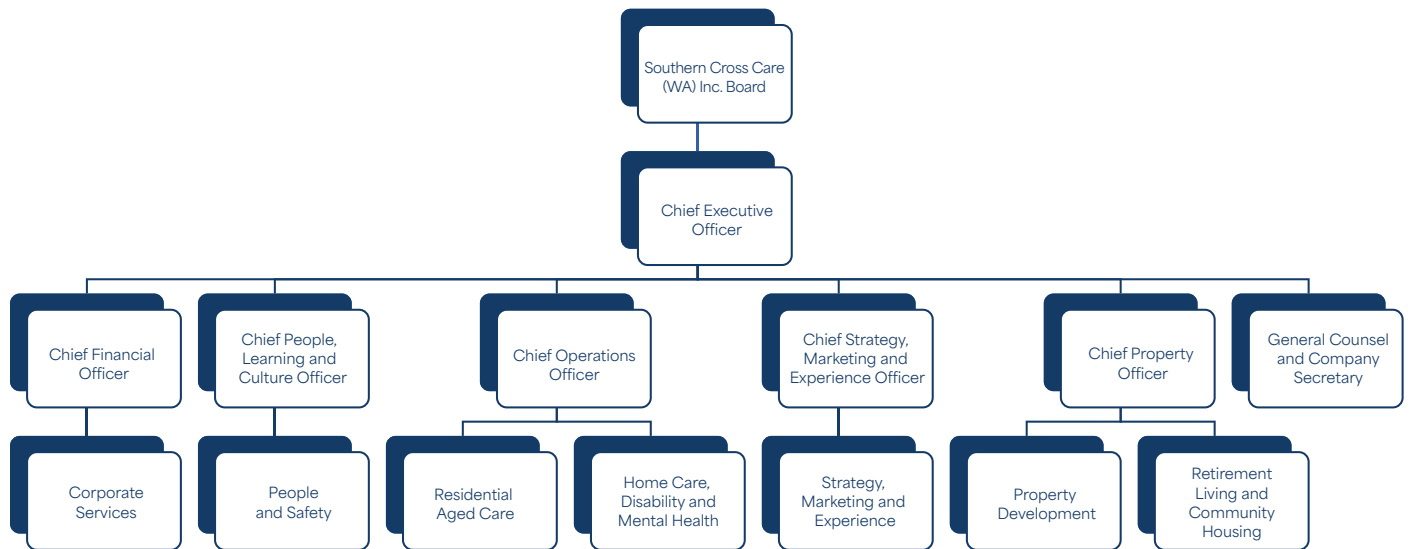
Criteria 2: Structure, operations and supply chains

Structure

SCCWA is a mission-driven aged care and community services provider with a governance and leadership structure designed to ensure accountability, strategic direction, and high-quality service delivery. The organisation is an incorporated association governed by a Board with extensive experience across corporate, health, disability, aged care, insurance, property, and public service sectors.

The Board work alongside the Executive team to provide governance and strategic leadership to ensure SCCWA remains true to its vision of transforming our sector and the experience of the people we care about.

In FY2025/26, SCCWA's annual revenue was \$147.4m with expenses of \$133.3m. The Modern Slavery Statement is for calendar year 2025.



1,127

Direct employees



120

Active volunteers

Our People

1,127 people directly worked for SCCWA in 2025, 85 per cent were women.

Workforce profile

Category	No.
Direct Female Employees	954
Direct Male Employees	173
Direct Permanent Employees	922
Direct Fixed Term/Temporary Employees	205

Employees with visas are managed by our in-house team in accordance with our Employee Records Policy, and in compliance with immigration requirements under Australian law.

SCCWA has completed a large body of work to consolidate all of its employee enterprise agreements under one organisational agreement. This ensures all employment conditions are simpler and more consistently applied.

Some employees are engaged through agency and other labour hire arrangements. SCCWA has a range of systems in place to identify and action changes to employment entitlements, immigration requirements, equal opportunity requirements, and health and safety legislation. During 2025, 205 people were employed through temporary and fixed-term arrangements.

Our operational sites



Residential aged care

SCCWA has eight residential aged care homes with 489 beds throughout metropolitan Perth and regional WA, providing 24/7 clinical and personal care while prioritising the dignity and personal choices of our residents. Our homes in Rossmoyne and Success also accommodate eight-bed transition units for residents requiring mental health care in High Dependency Units (HDU). In addition to residential aged care, Villa Pelletier in West Leederville supports people aged over 65 who have health needs and are experiencing homelessness or insecure tenancy, through our Housing the Homeless program.



Retirement living

Our seven retirement villages with 510 villas in the Perth metropolitan area offer a sense of safety, security, and community where residents can enjoy their independence and make the most of their retirement.



Mental health services and support

SCCWA offers a broad range of mental health services for our 202 clients and their carers. We support adults aged between 18 and 65 who have a diagnosed mental illness or are experiencing mental health concerns. We offer various support services in three residential settings and in the community, through community mental health and Family and Carer Support programs.



Pastoral care

Our pastoral carers are trained to listen and help residents and their families make sense of the changes that are occurring and provide support during challenging times. The team deliver pastoral care across residential aged care, retirement living, and home care services. They also deliver the 'Connect the 40%' program and the No One Dies Alone (NODA) program.



Home care

Our home care services include government-funded care via Home Care Packages (HCP), the Commonwealth Home Support Program (CHSP), Short-Term Restorative Care (STRC) Program and the Community Transition Care Program (CTCP). The HCP program changed to Support at Home on 1 November 2025. We provide home care services to 2,018 clients across the Perth metropolitan area, Broome townsite and within a 30km radius of Bunbury and Busselton.



Disability support

SCCWA is a registered provider under the National Disability Insurance Scheme (NDIS). Our disability services provide opportunities for 39 people living with a disability to increase participation in all aspects of community life.



Respite care

Our respite services include a range of flexible, day or overnight respite options, either in-home, at one of our dedicated respite centres in Forrestfield or Hilton, or short-term in one of our residential aged care homes.



Health and Wellness Centre

Our Health and Wellness Centre in East Fremantle offers specialised exercise and rehabilitation services for people aged over 55. The centre, which is co-located with our residential aged care home SCCWA, East Fremantle, provides a range of services including rehabilitation physiotherapy, exercise physiology, gym sessions, hydrotherapy, and group classes, and is available to the public with a GP referral.



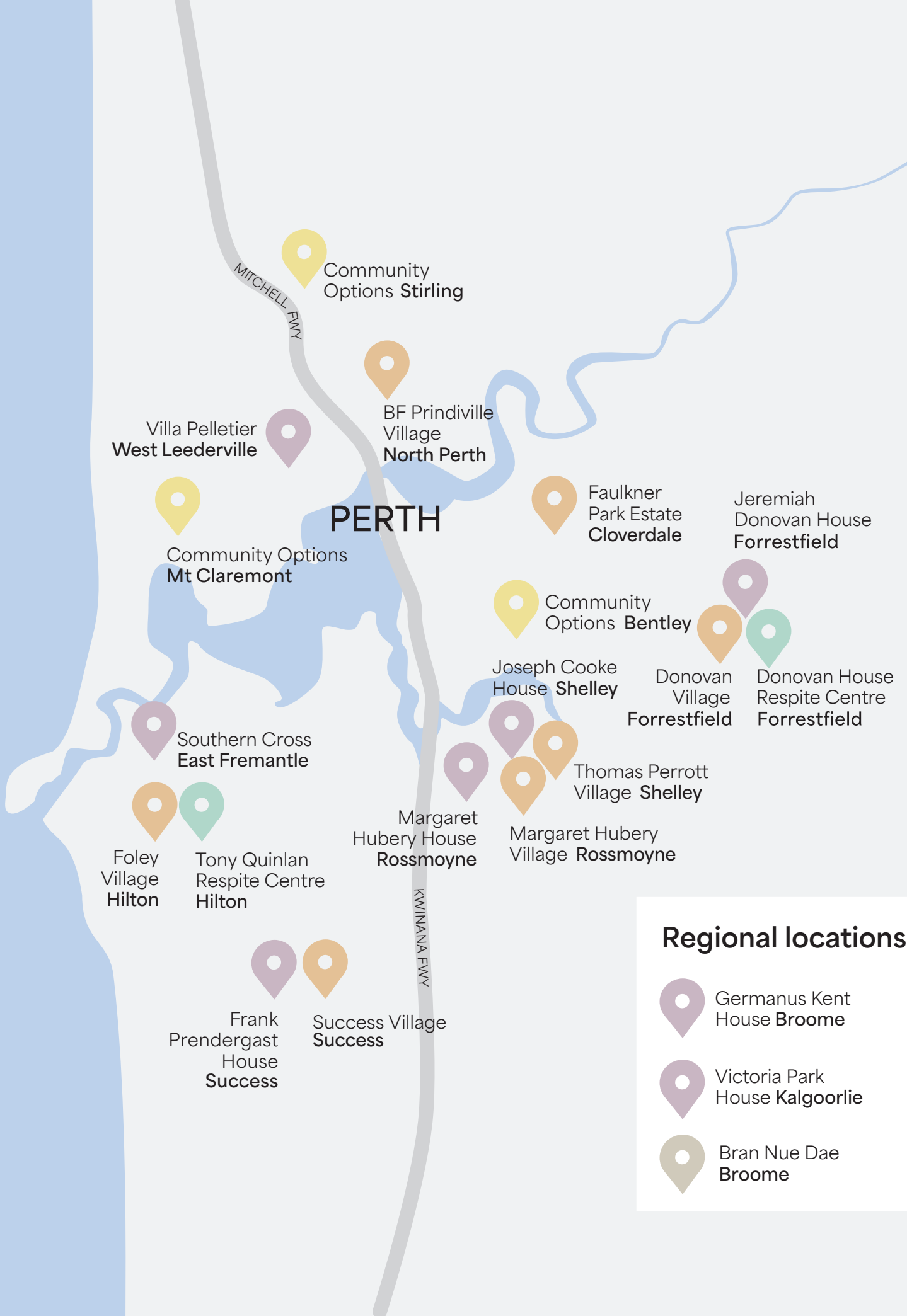
Southern Cross Housing

Southern Cross Housing Ltd (SCH) offers affordable community housing to people aged over 55 or younger people living with mental illness or disability. SCH provides 358 properties across 39 suburbs in Perth, ranging from the City of Joondalup in the north to the City of Rockingham in the south and out to the City of Swan in the east.





Central Office

SCCWA's Central Office is located in Rivervale, with all corporate and operational support teams for both SCCWA and SCH.



Regional locations

-  Germanus Kent House **Broome**
-  Victoria Park House **Kalgoorlie**
-  Bran Nue Dae **Broome**

Supply chain

To deliver a wide range and scope of care, SCCWA relies on products, goods and services including:

- Medical and related services, such as allied health services and agency staff.
- Building, construction and infrastructure services, including waste management and property development.
- Ancillary services such as food, cleaning, linen and laundry, and security.
- Communications, information technology and support, and software solutions and support.

SCCWA predominantly buys from suppliers with an Australian presence.

However, given the specialist nature of the services we provide, many of our providers are international suppliers with head offices based all around the world.

Modern Slavery Working Group

The Modern Slavery Working Group (MSWG) was established in July 2024 and is responsible for facilitating the SCCWA's response to modern slavery legislative requirements, utilising the support and resources developed by the Australian Catholic Anti-Slavery Network (ACAN).

The MSWG is chaired by the Chief Financial Officer (CFO) and meets quarterly to review adherence with the Modern Slavery three-year Action Plan. Other members of the MSWG include the Company Secretary & General Counsel, Senior Manager Risk and Assurance, People Business Partner and the Procurement and Contract Manager.

This working group regularly informs and advises the SCCWA Executive Leadership Team on modern slavery related issues and is responsible for monitoring, managing and mitigating modern slavery risks across SCCWA.

The Executive Leadership Team informs the SCCWA Board of progress in compliance with the Act, in line with the SCCWA Board Work Plan.

Criteria 3:

Modern Slavery risks in our operations and supply chain

Operational risk

This year SCCWA has developed and implemented a Vendor and Supplier Compliance Framework categorising vendors and suppliers against multiple risk criteria and then providing compliance requirements to these categories. One of the risk criteria is the legislative compliance requirement of the work undertaken, which includes a Modern Slavery risk assessment.

SCCWA has a Code of Conduct governing how employees conduct themselves in our organisation's operations. This has been further strengthened through the implementation of the Fraud Protection Policy and updates to the Whistleblower Policy.

SCCWA does not tolerate improper conduct by our employees, officers, or volunteers, and we are committed to protecting and supporting whistleblowers who disclose improper conduct.

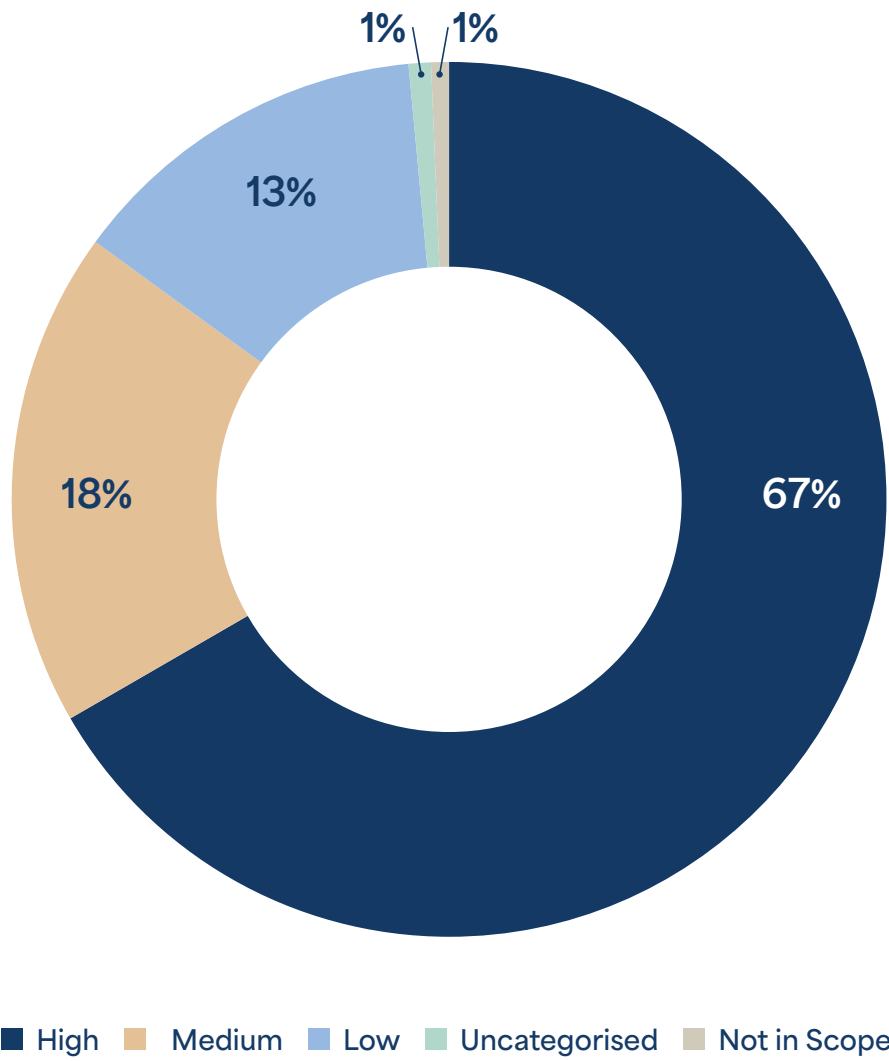
Supply chain risks

In 2025 SCCWA undertook a risk analysis of our suppliers based on spend with the support of ACAN. Over the last 12 months, SCCWA has focused on consolidating its vendor and supplier base to support operational efficiencies and to reduce risk exposure within high-risk procurement categories.

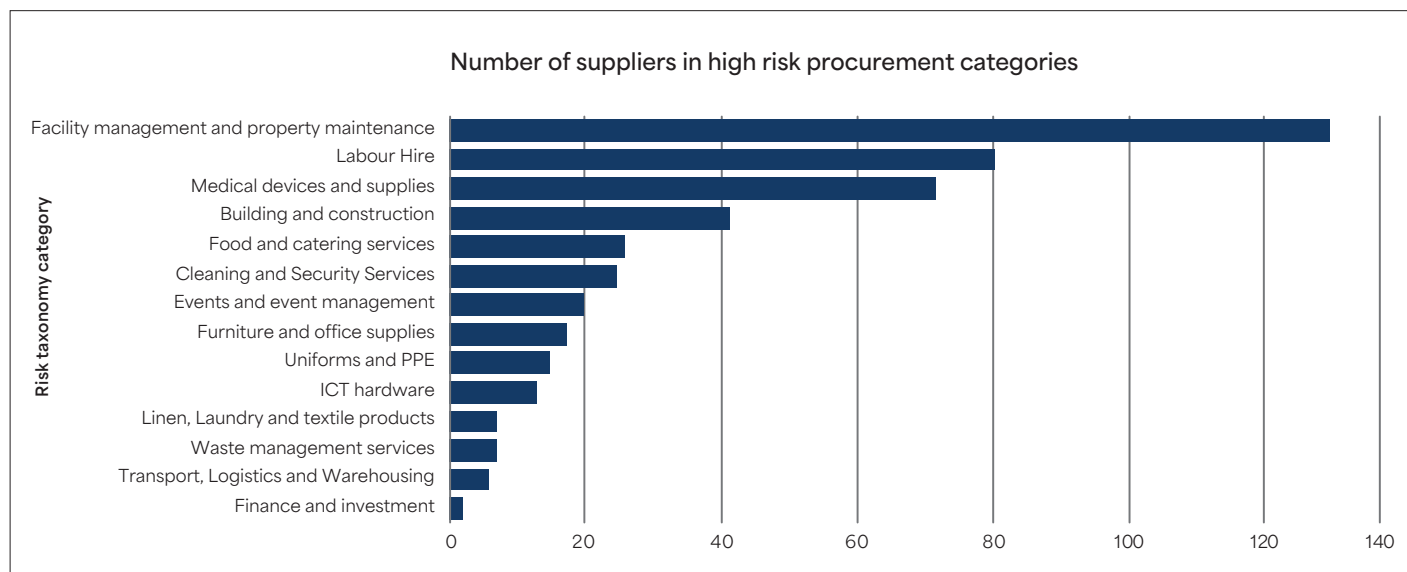
The resulting risk dashboard identified 67% of SCCWA's spend was within high-risk spend categories. This is an increase from 2024 however 99% of all SCCWA's spend is now categorised within the ACAN risk taxonomy.

The number of high-risk vendors has reduced from 471 to 461, which is a significant achievement considering the support these vendor categories provide SCCWA in achieving its organisational goals and objectives.

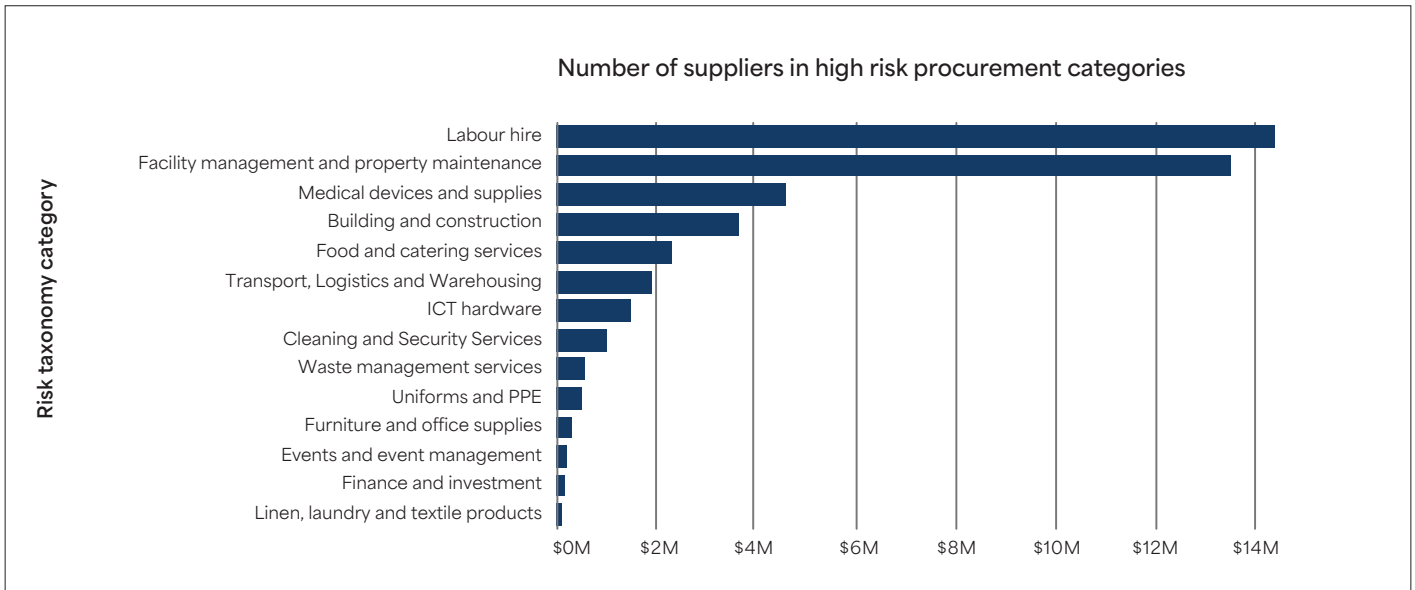
Total spend per taxonomy category risk



The high-risk spend categories are detailed below in the bar chart and table. These procurement categories have an increased risk of Modern Slavery work practices. The graph and table demonstrate the majority of SCCWA’s modern slavery risk sits within the facility management and property maintenance category.



Risk taxonomy category	Number of suppliers
Linen, laundry and textile products	7
Finance and investment	2
Events and event management	20
Furniture and office supplies	17
Uniforms and PPE	15
Waste management services	7
Cleaning and security services	25
ICT hardware	13
Transport, logistics and warehousing	6
Food and catering services	26
Building and construction	41
Medical devices and supplies	72
Facility management and property maintenance	131
Labour Hire	80
Total	461



Risk taxonomy category	Spend
Linen, laundry and textile products	\$89,112
Finance and investment	\$149,359
Events and event management	\$184,240
Furniture and office supplies	\$295,160
Uniforms and PPE	\$513,256
Waste management services	\$565,361
Cleaning and security services	\$1,025,347
ICT hardware	\$1,492,354
Transport, logistics and warehousing	\$1,907,124
Food and catering services	\$2,326,174
Building and construction	\$3,655,506
Medical devices and supplies	\$4,593,696
Facility management and property maintenance	\$13,543,279
Labour Hire	\$14,456,683
Total	\$44,796,651

Criteria 4:

Actions taken to assess and address the risks

Modern Slavery Working Group

The MSWG was established in 2024, and a Modern Slavery Liaison Officer (MSLO) was appointed to work with the ACAN to support and enhance SCCWA's responses to the risks of modern slavery.

Working in conjunction with the ACAN and under the supervision of the MSWG, the following goals have been achieved in 2025:

- Led the development and implementation of the Vendor and Supplier Compliance Framework.
- Coordinated a presentation by ACAN to the SCCWA Board and Executive.
- Updated and reviewed the SCCWA Risk Register to ensure Modern Slavery Risks were identified.
- Identified the top 50 high risk vendors and suppliers who support SCCWA.
- Reviewed and updated workforce employment and recruitment policies and procedures.
- Created an ongoing communications plan for Modern Slavery Working Group activity.
- Contacted all suppliers and informed them of the new compliance framework and Modern Slavery monitoring activities.

The MSWG continues to work through its 2024-2026 work plan and will continue to implement controls, mitigations and processes to strengthen its approach to eradicating modern slavery risk within its business processes.

Australian Catholic Anti-Slavery Network (ACAN)

In 2024, SCCWA joined the ACAN, comprising of more than 50 Catholic organisations around Australia, including large Catholic health and aged care providers.

The SCCWA Modern Slavery Liaison Officer (MSLO) attended ACAN conferences and monthly meetings with the purpose of understanding and responding to the potential risks of modern slavery at SCCWA and the organisation's supply chain.

SCCWA completed the ACAN assessment for 2025 within the Sedex platform, which is a new feature of the ACAN membership for 2025. Sedex is a global company specialising in reviewing the data and insights for supply chain networks.

The assessment undertaken within Sedex determines a risk score for organisations against business and supply chains across 180 countries and 35 sectors globally. Through this assessment, insights are presented into the risks faced by the organisation's operations and management controls.

The Sedex assessment identified SCCWA has strong governance frameworks and processes in place, which include adequate risk assessment of business activities. SCCWA received a combined risk score of 5.9/10, which is a medium risk score.

The combined risk score merges the inherent risk score of the sector and geographical location of the organisation, with the site characteristics of the type of work conducted. This is then adjusted based on the management controls in place within the organisation.

SCCWA has worked with ACAN to develop our organisational commitment, internal education and training, procedural and policy resources, and other business systems.

Education and awareness

The SCCWA Board and Executive Management Team were provided a presentation and overview training by ACAN on the risks of modern slavery and effective supplier engagement and remediation.

Roles within SCCWA with high touch points with vendors and employees at risk will access online learning in 2026. This progressive approach to training and education is in line with the three-year work plan.

Criteria 5: Effectiveness assessment

The MSWG meet quarterly and review the effectiveness of the actions SCCWA are taking in addressing the risk of modern slavery in our operations and supply chain. The Modern Slavery Three-Year Action Plan will be implemented and reviewed annually.

The table below provides an overview of the effectiveness of risk mitigation activities implemented by SCCWA. This effectiveness has been independently reviewed by ACAN through their annual maturity assessment.

	Activity	2024	2025
Internal / staff	Hours spent on modern slavery activities	140	180
	Individual staff completed e-learning	5	5
	E-learning modules completed	5	5
External / supplier engagement	Total number of suppliers	835	825
	Number of suppliers with visible contact information and ABN	224	812
	Number of suppliers across high-risk categories	472	461
	Number of ACAN Supplier Surveys completed	62	151
	Supplier staff attending capacity building webinars	17	17
	Invited to join Sedex	16	32
	Joined Sedex	23	37
	Sedex SAQ completed	0	46
	Social audits	0	2
	Corrective actions	0	10
External referrals	Contacts made via worker voice / grievance mechanism	0	0
	Referrals for advice and assistance	0	0
	Individuals identified or referred for modern slavery assessment	0	0
	Individuals with modern slavery cases remediated	0	0

Action plan

The MSWG continues to work through its 2024-2026 work plan and will continue to implement controls, mitigations and processes to strengthen its approach to eradicating modern slavery risk within its business processes.

Criteria 6:

Consultation with owned and controlled entities

SCCWA provides all support and resourcing to Southern Cross Housing Ltd (SCH). This is managed through an intercompany agreement that has been agreed by the SCCWA and SCH Boards.

Criteria 7:

Any other relevant information

No other relevant information.

Approval

This Modern Slavery Statement was approved by the principal governing body of Southern Cross Care (WA) Inc., as defined by the Modern Slavery Act 2018 (Cth) (“the Act”) on 18 June 2026.

This Modern Slavery Statement is signed by a responsible member of Southern Cross Care (WA) Inc. as defined by the Act.



Tony Vis
Board Chair
Southern Cross Care (WA) Inc.

