

MODERN SLAVERY POLICY



Policy	Modern Slavery
Version	2
Date of Approval	6 August 2024
Effective date	2024
Date for Review	2025
Policy Officer	Executive Director

Rationale	<p>The purpose of this policy is to assist the Trustees of Kildare Ministries (TKM) to effectively identify, disclose and manage any actual, potential or perceived risk of Modern Slavery in order to protect the integrity of TKM and manage risk.</p> <p>TKM has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in all business relationships. TKM is committed to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own organisation or in any of our supply chains. TKM aims to ensure the Trustees, Boards and employees are aware of their obligations to disclose any act of modern slavery, and to comply with this policy.</p>
Principles and Values	<p>The Trustees of Kildare Ministries operates within the Vision, Mission and Values of Kildare Ministries. The Vision, Mission and Values underpin approaches to policy, process and procedure development within Kildare Ministries.</p> <p>The operations of Kildare Ministries are informed by a series of inter-connected principles inherited from the Scriptures and practices of ecclesial governance:</p> <ul style="list-style-type: none"> • Stewardship • Collegiality • Subsidiarity • The Common Good
Definitions	<p>Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour, forced marriage and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain.</p>
Policy	<p>It is the policy as well as a responsibility of the Trustees of Kildare Ministries and personnel employed in the TKM Office and ministries, that any form of modern slavery be avoided.</p> <p>TKM will manage this risk by requiring the Trustees and personnel to:</p> <ul style="list-style-type: none"> • avoid any form of modern slavery in the ordinary course of business • identify and disclose any acts of modern slavery in our supply chains • work with suppliers to eliminate modern slavery from our supply chains • follow this policy and respond to any breaches.

Resources	<p>Australian Government Department of Home Affairs https://www.homeaffairs.gov.au/criminal-justice/Pages/modern-slavery.aspx Modern Slavery Act 2018</p>
Communication and awareness of this policy	<p>Training on this policy, and on the risk our ministries face from modern slavery in its supply chains, will be provided via the college Business Managers & Risk and Compliance Officers and TKM Office as necessary.</p> <p>Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter. We will endeavor to inform our community of the impact of Modern Slavery through our newsletters and other forms of communication.</p> <p>It is noted that progress/implementation could be gradual in specific contexts.</p>
Breaches of this policy	<p>Any employee, Director or Trustee who knowingly breaches this policy may face disciplinary action.</p> <p>TKM may terminate any relationship with other individuals and organisations working on its behalf if they breach this policy.</p>
Related policies and procedure	Whistle-blower policy
Reporting requirements	<p>The Trustees of Kildare Ministries is subject to the Modern Slavery Act 2018 that commenced operation on 1 January 2019. The Act requires reporting entities subject to the Act, to produce an annual modern slavery statement. The first annual statement for Kildare Education Ministries for 2020 was submitted in March 2021 and TKM’s statement for 2021 will be submitted in 2022.</p> <p>Modern Slavery statements required by the Federal Act must identify the reporting entity and address the following mandatory criteria:</p> <ul style="list-style-type: none"> • The reporting entity’s structure, operations and supply chains; • Modern slavery risks in the reporting entity’s operations and supply chains (including those of subsidiary entities); • Actions taken (including by subsidiary entities) to assess and address those modern slavery risks, including due diligence and remediation processes; • How the reporting entity assesses the effectiveness of actions taken; and • The process of consultation with subsidiary entities in preparing the modern slavery statement