



CATHOLIC EDUCATION
WESTERN AUSTRALIA



Modern Slavery Statement

1 January – 31 December 2025



Catholic Education Western Australia Limited



Catholic Education Western Australia Limited

ABN 47 634 504 135

Acknowledgement to Country

Catholic Education Western Australia Limited (CEWA) acknowledges the Traditional Owners of the lands on which we live, learn and work. CEWA acknowledges the continued deep spiritual connection and relationship of First Nations people to country and commits to the ongoing journey of reconciliation.

Disclosure Note

This statement has been made on behalf of Catholic Education Western Australia Limited. This statement is prepared pursuant to section 13 of the *Modern Slavery Act 2018* (Cth) and covers Catholic Education Western Australia Limited as a single reporting entity.

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Leadership Message

Approval and Signature

Eva Skira AM

*Chair, Catholic Education
Commission of Western
Australia*



Acknowledging the Gospel and the unshakable dignity of every human person, Catholic Education Western Australia Ltd affirms its profound commitment to justice, human rights and the protection of the vulnerable. Our shared Catholic social teaching calls us not only to recognise the reality of human exploitation but to act decisively against it.

Modern slavery in all its forms is a grave affront to human dignity and human rights. It persists in global supply chains and local economies alike, hidden among products, services and procurement processes that often escape scrutiny. As a community of faith and educators entrusted with forming young hearts and minds, we are compelled to confront this injustice with courage, vigilance and hope.

Recent advocacy by Australia's Anti-Slavery Commissioner has highlighted the urgent need for stronger corporate accountability and meaningful action to tackle modern slavery risks. Australian laws that currently require disclosure without enforceable due diligence obligations, penalties or measured outcomes have too often resulted in a "tick-a-box" approach that fails to protect exploited workers and communities. There is a growing call for more robust legal frameworks that require businesses to thoroughly investigate and address modern slavery in supply chains bringing us in line with global norms.

In preparing this Modern Slavery Statement, Catholic Education Western Australia Ltd acknowledges these broader societal concerns and takes seriously the responsibility entrusted to us. Our moral and ethical imperative, rooted in faith and in solidarity with all who suffer exploitation, compels us to identify, address and seek to eliminate any risk of modern slavery within our operations and supply chains. We commit to transparency, continuous improvement and collaboration with our Catholic communities, suppliers and partners as we strive to ensure that our business practices reflect respect for human rights and the common good.

It is our hope and prayer that this Statement not only fulfils our statutory responsibilities but also reflects a deeper spiritual commitment to freedom, justice and human flourishing for all.

A handwritten signature in black ink, appearing to be 'E. Skira', written in a cursive style.

Eva Skira AM

Chair

Catholic Education Commission of Western Australia

This Modern Slavery Statement was approved by the principal governing body of Catholic Education Western Australia as defined by the Modern Slavery Act 2018 (Cth) ("the Act") on 5 June 2026. This Modern Slavery Statement is signed by a responsible member of Catholic Education Western Australia as defined by the Act.

Leadership Message

Approval and Signature

Annette Morey
*Executive Director,
Catholic Education
Western Australia Limited*



It is my privilege to present to you the Modern Slavery Statement for 2025 for Catholic Education Western Australia Ltd (CEWA).

The Statement operationalises our deeply held belief in the dignity of all human persons, particularly those who are in need or face injustice. Modern Slavery continues to be a complex issue impacting communities not just in Australia but across the world. According to the Global Slavery Index 2023, there are an estimated 41,000 people living in conditions of modern slavery in Australia – that’s 1.6 victims for every thousand people in this country.

In his message for the 12th World Day of Prayer and Awareness Against Human Trafficking, Pope Leo XIV noted the scourge of human trafficking was fuelled by ‘logic of dominion and disregard for human life’ and noted that

“ True peace begins with the recognition and protection of the God-given dignity of every person. ”

As an organisation that is not only committed to reflecting the teachings of Jesus Christ, but which is responsible for shepherding the next generation into adulthood, it is incumbent on us all to serve as examples of the best of humanity, modelling this ‘true peace’ and recognising that God-given dignity through our words and our actions.

So, it is a source of pride that the phased roll-out of CEWA’s new procurement system is progressing. Once complete, this centralised system will allow for identification of high-risk categories and ensure we are able to mitigate risks in our extended supply chains.

Five years on from the launch of our first Modern Slavery Statement in 2021, our schools and offices continue to deepen our collective understanding of this issue and seek to identify and eliminate its root causes.

I thank those staff who have been involved in developing this updated Statement and encourage everyone to consider the impact we can have individually and collectively to eliminate this affront to human dignity.



Annette Morey
*Executive Director
Catholic Education Western Australia Limited*

Criterion 1

About Catholic Education Western Australia Limited (CEWA)

16.6%

of all WA school students are at a CEWA school

19%

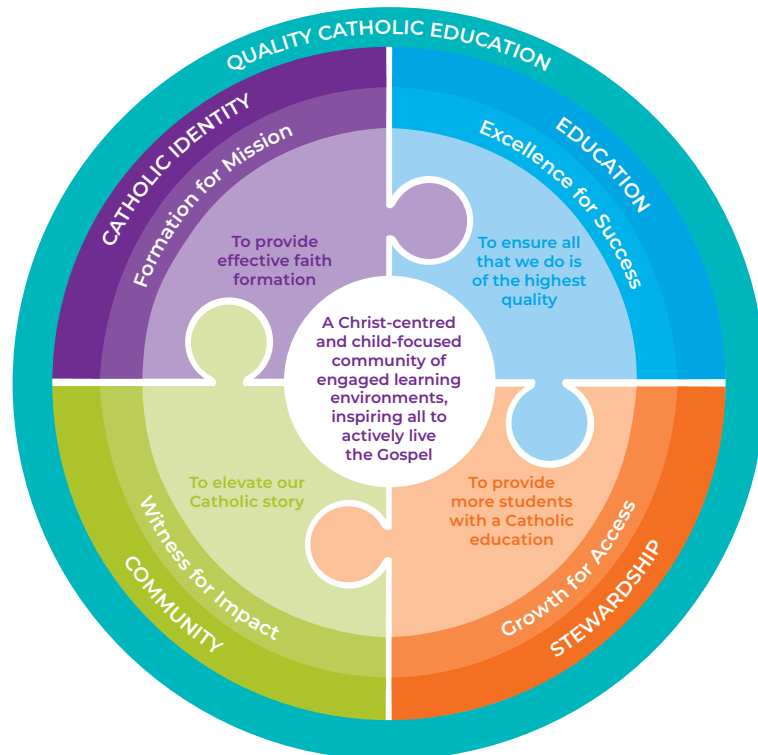
of all WA secondary school students are at a CEWA school

Established by the Catholic Bishops of Western Australia, CEWA's purpose is to provide a Catholic education for all families who seek it for their children. Through its Catholic schools, CEWA provides all students with Christ-centred, child-focused learning environment, to empower young people to actively live the Gospel and to become responsible citizens who contribute to the development of Australian society.

CEWA is the second largest education provider in Western Australia, providing a faith-based education for 16.6% of the State's total school-age population, including 19% of all secondary students. In 2025, more than 83,000 students were enrolled in 162 Catholic schools across Western Australia, including Catholic schools with governing bodies other than CEWA.

CEWA provides employment for more than 13,000 staff, making it a significant contributor to the Western Australian economy.

Guided by the [Strategic Initiatives 2030](#), launched by the Catholic Education Commission of Western Australia (CECWA) in 2024, CEWA continued to keep its focus on providing effective faith formation (Formation for Mission), ensuring all CEWA does is of the highest quality (Excellence for Success), elevating our Catholic Story (Witness for Impact) and providing more students with a Catholic education (Growth for Access).



Quality Catholic Education (QCE) embraced across Catholic schools and offices, continues to ensure CEWA's commitment to practices that reflect Catholic Social Teaching. Receiving a quality Catholic education, care and support enables young people to make a positive contribution to society in line with Catholic Social Teaching. CEWA schools and offices support all students, regardless of their individual circumstances, especially the marginalised and disadvantaged, guided by our mission of bringing the Good News of Jesus Christ to all.

Criterion 2

Our Structure, Operations and Supply Chains

Our Organisational Structure

In 2025, CEWA was the governing body for 150 CEWA schools and provided registration oversight for an additional eight Catholic schools with their own governing body. The Members of CEWA are the diocesan Bishops of Western Australia.

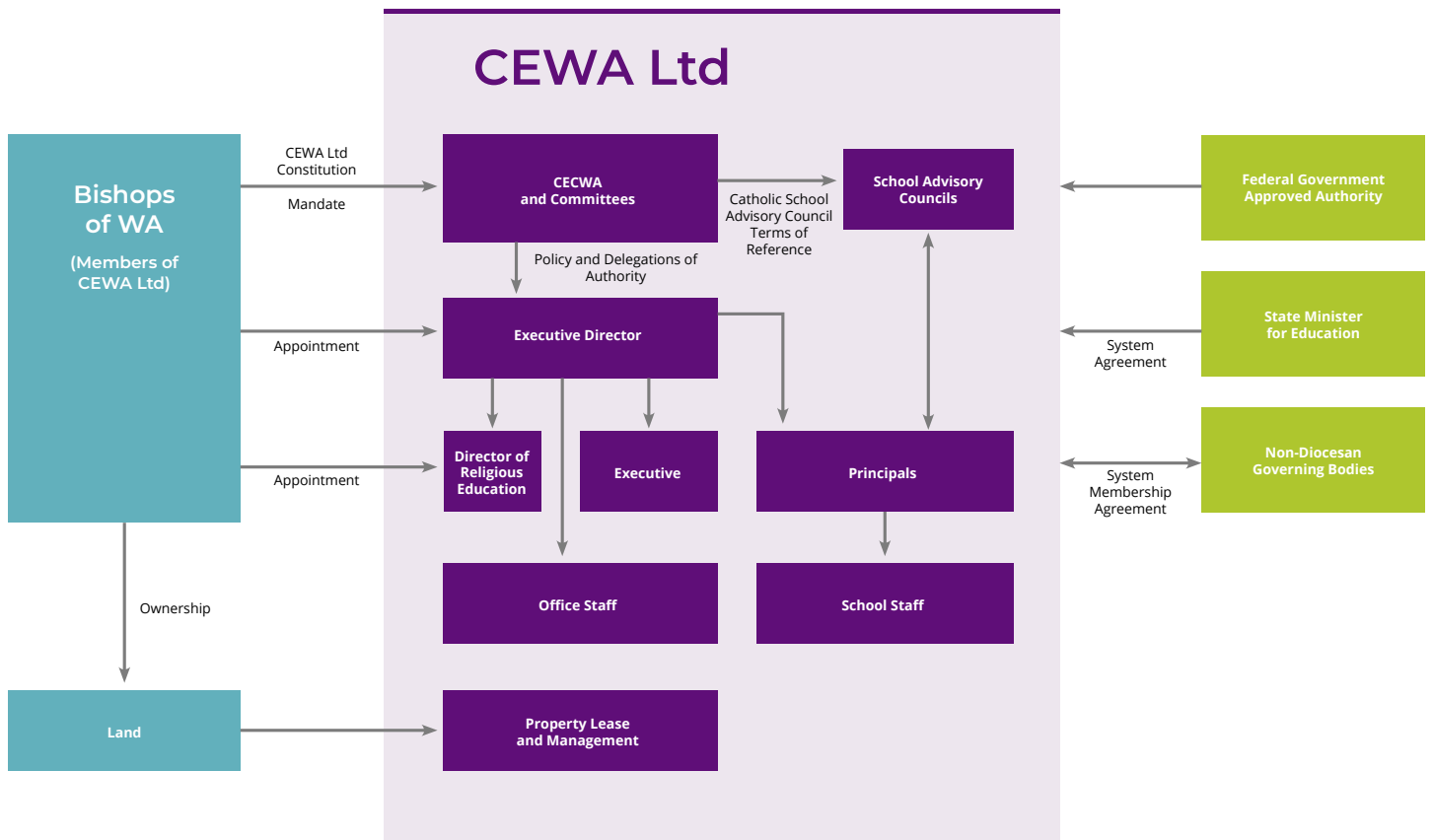
CEWA's annual consolidated revenue in 2025 was \$1,461,073,111.

In addition to being registered as a company with ASIC (ABN: 47 634 504 135), CEWA is registered with the Australian Charities and Not-for-profits Commissioner (ACNC).

The Catholic Education Commission of Western Australia (CECWA), as the Board of Directors of CEWA, directs CEWA to develop learning communities that fulfil the goals of Catholic schools as outlined in the Bishops' Mandate. CECWA is supported through five committees, established to advance the strategic priorities of CEWA and monitor activities. In 2025, these committees included:

- Aboriginal Community Committee;
- Audit and Risk Committee;
- Finance Committee;
- Formation and Workforce Committee; and
- School Improvement Committee.

CEWA's governance structure is illustrated below:



Criterion 2: Our Structure, Operations and Supply Chains (continued)

CEWA schools and Catholic schools with governing bodies

In addition to the 150 CEWA schools, the CEWA System includes eight schools that are governed by five governing bodies other than CEWA. For the purposes of school registration in Western Australia, the eight schools with governing bodies other than CEWA are included within the CEWA System, creating CEWA's responsibility for compliance for all school registration matters. For all governance purposes other than school registration, decisions are taken by the respective governing bodies.

CEWA Executive Team

The Executive Director of CEWA in 2025 was Wayne Bull, succeeded by Annette Morey in July 2025. The Executive Director was supported by the following Directors within the CEWA Executive Team:

Deputy Executive Director	Annette Morey (until July 2025) Julie Hornby (from July 2025)
Director Finance, Infrastructure and Digital Technology	Dr Glennda Scully
Director School Improvement and Wellbeing	Dan Wood
Director People and Culture	Paul Andrew
Director Teaching and Learning	Mandy Connor
Director Religious Education	Rev Mark Powell

The CEWA Executive Team is based in CEWA's West Leederville office (Perth) and is supported by approximately 380 office staff working across the four Catholic dioceses in Western Australia: the Archdiocese of Perth, the Diocese of Bunbury, the Diocese of Broome and the Diocese of Geraldton.



Our Governance Framework

CEWA is guided by a robust governance framework that responds to the high expectations of the Australian Securities and Investments Commission (ASIC), the Australian Charities and Not-for-profits Commission (ACNC), the Bishops of Western Australia, the Federal and State Governments, and CEWA's students, staff, stakeholders and community.

CEWA is governed by four overarching policies aligned with Quality Catholic Education: Catholic Identity, Education, Community and Stewardship. Supporting the four policies are a suite of Executive Directives. CEWA's Executive Directives articulate CEWA's policy requirements and provide directions to be followed across the System.

Criterion 2: Our Structure, Operations and Supply Chains (continued)

CEWA has an *Executive Directive – Modern Slavery Prevention*. This Executive Directive calls for CEWA to operate within the following principles:

1. Catholic Social Teaching calls for the dignity of work, the rights of workers and the advancement of the common good.
2. CEWA does not knowingly use or contribute to modern slavery practices in any form.
3. CEWA actively works to identify and eliminate modern slavery practices from operations, business partnerships and supply chains.
4. Any form of exploitative treatment, punishment, abuse of labour rights, coercive control (physical, mental, psychological or financial) of CEWA community members or of people in its supply chain is unacceptable.
5. CEWA complies with all relevant laws and regulations regarding worker recruitment, remuneration, working conditions and freedom of association.
6. CEWA's final purchasing decisions are not to be based on price alone. Ethical business processes are an essential part of CEWA's value for money and fit for purpose consideration which includes consideration of a living wage for workers and responsible worker recruitment.
7. CEWA incorporates ethical considerations alongside more traditional financial factors into investment analysis and decision making.
8. CEWA continues to support suppliers and business partners to assess and address modern slavery risks and take action to improve transparency, traceability and accountability for modern slavery practices and impacts in our collective supply chain.

A risk management framework has been implemented across the system at enterprise, individual school and office level. CECWA has overall responsibility for the implementation and oversight of the risk management program and is supported by the Audit and Risk Committee. The breadth of risks addressed is wide and includes risks relating to modern slavery.

CECWA is updated on CEWA's progress to address, monitor and review modern slavery risks through the Executive Director's report to CECWA as matters arise.

Modern Slavery Working Group

In August 2025, CEWA re-instated its Modern Slavery Working Group, comprising staff from the relevant Directorates and Teams, including from the Finance, Infrastructure and Digital Technology Directorate, the People and Culture Directorate, and the Religious Education Directorate.

The role of the Modern Slavery Working Group is to develop an updated Modern Slavery Prevention Action Plan 2026–2028 and to support the preparation and submission of the annual Modern Slavery Statement. The Working Group will develop a dedicated Terms of Reference and will meet at least once per quarter. The Working Group will be accountable to the Director of Finance, Infrastructure and Digital Technology.

Criterion 2: Our Structure, Operations and Supply Chains (continued)



Our Operations

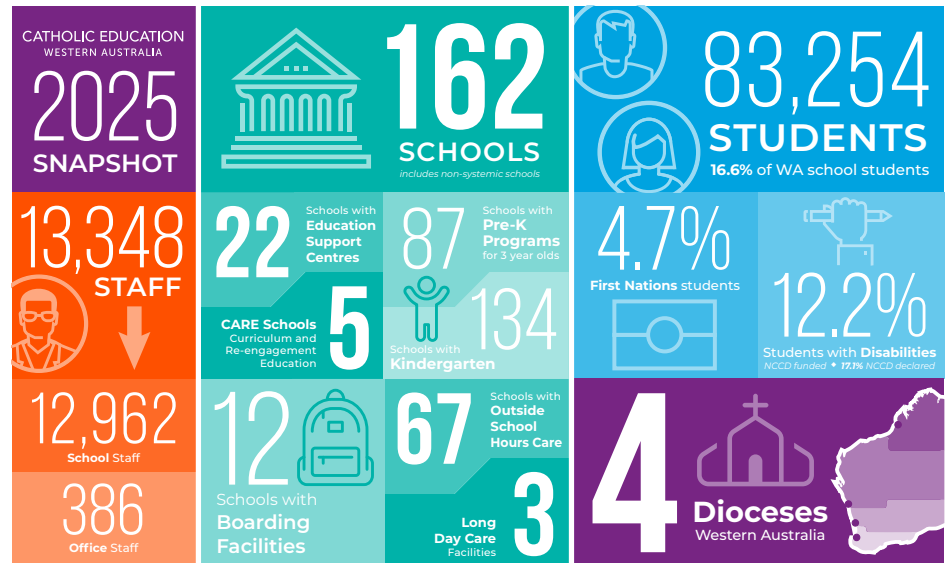
CEWA is responsible for the provision of quality Catholic education throughout the state of Western Australia and is the only recognised non-government school system in the State. As well as playing a pivotal role in supporting a developmentally appropriate and engaging teaching and learning program for children and young people, Catholic schools provide vital faith formation, pastoral care and wellbeing support to all involved within the System.

CEWA's wide range of operations include:

- the development of Catechist resources to prepare children not attending Catholic schools to receive the sacraments at the appropriate ages through the Parish Religious Education Program (PREP);
- providing resources, formation training and information to support the work of parish Catechists and Sacrament Coordinators;
- providing outside of hours school care, long day care and vacation care;
- providing flexible and supportive education through our five Curriculum and Re-engagement in Education (CARE) schools to enable young people at risk to continue their education journey in a safe, supportive environment;
- providing access to boarding and residential accommodation to students from families in regional areas so they can access a quality Catholic secondary education;
- providing traineeships, cadetships and scholarships to facilitate career pathways in the education sector for First Nations peoples;
- providing educators and support staff – through the Kimberley Calling program – with the experience of learning, living and serving in the Catholic school communities of the Kimberley, emphasising the abundance of rich personal, professional, cultural and environmental experiences, and unique opportunities and challenges of working in the region offers;
- delivering professional learning experiences to teaching and non-teaching staff throughout Catholic Education Western Australia, including programs and courses in leadership development and accreditation; and
- facilitating research in Catholic schools and informing education policy making and practice.

Criterion 2:
**Our Structure,
Operations and
Supply Chains**
(continued)

An overview of CEWA's reach is provided in the May 2025 Snapshot below.



CEWA schools and offices engage contractors and subcontractors to provide cleaning services, waste management and conduct routine maintenance tasks.

The development and advancement of CEWA's centralised procurement strategy and approaches will continue to increase due diligence in contractor management. The documentation is anticipated to set out social, environmental and ethical expectations of suppliers, including the requirement that forced, involuntary or underage labour is expressly forbidden.

Construction and capital development account for significant spend within CEWA due to new school construction, provision of new facilities and maintenance of existing facilities. Known to be high-risk areas because of the prevalence of labour hire, spend in these areas is also subject to improved due diligence processes within CEWA's *Building Quality Catholic Schools* document.

Our Supply Chains

Across CEWA, purchases are made at system-level and this report is focused on purchases that are driven by management-made decisions. However, Catholic school principals are responsible for a large proportion of their purchasing decisions, including building-related purchases. Through further maturity of system processes, it is anticipated that future ethical purchasing decisions will be made by the system, with schools operating through a preferred suppliers' program.

The CEWA 2025 Snapshot represents 162 Catholic schools who make up the Community of Catholic schools in Western Australia. This includes 150 CEWA schools, eight Catholic schools with governing bodies other than CEWA, who are part of the CEWA System through the signing of System Membership Agreements, as well as four Catholic schools who are independently registered for the purpose of registration. Data as at May 2025.



Criterion 3

Modern Slavery Risks

In 2025 CEWA procured

\$257m

of goods and services

These goods and services were sourced from approximately

17,600

predominantly Australian suppliers

In 2025, CEWA procured \$257,820,081 of goods and services from approximately 17,614 direct suppliers* (predominantly Australian). Services procured included building, cleaning, facilities management, security services and waste management services, all of which are known to be at increased risk of worker vulnerability, labour exploitation and modern slavery due to the low level of pay and the high prevalence of employment of migrant workers.

CEWA acknowledges that business and procurement activities could cause, contribute to, or be directly linked to modern slavery practices in line with the *United Nations Guiding Principles on Business and Human Rights* and the associated reporting requirements of the *Modern Slavery Act 2018* (Cth). The risks of CEWA causing or contributing to modern slavery practices have been assessed as low, however it has been identified that CEWA's greatest modern slavery risk is through supply chains. CEWA seeks to prevent, mitigate and where possible remediate adverse human rights impacts that are directly linked to operations, products or services by business relationships, even if CEWA has not directly caused or contributed to those impacts. CEWA recognises that connections exist beyond daily operations and due diligence must necessarily extend to those activities.

CEWA acknowledges that uniform purchasing is a potentially high-risk area, both with regards to cotton growing and garment manufacturing. Uniform purchasing continues to be managed individually by Catholic schools. However, the development of the procurement system incorporated an overhaul of the supplier onboarding and categorising to fit the ACAN Category Risk Taxonomy, and will allow for identification of high-risk categories, including uniform suppliers. This will enable CEWA to continue to develop strategies to mitigate supplier risks.

CEWA has identified, through a procurement review, that the CEWA offices purchase a wide range of goods and services, including the areas listed below:

- construction services and suppliers;
- cleaning and security;
- electronics;
- furniture;
- stationery;
- food and catering supplies;
- travel and accommodation services; and
- books and printing.

CEWA recognises that the supply chains of our Tier 1 suppliers, and therefore CEWA's own supply chains are interconnected, complex and diverse, and extend beyond Australia. CEWA supply chains are connected with the lives of many people worldwide – and it is acknowledged that slavery is a reality for many of them. It has been identified that CEWA's extended supply chains present the highest risks for modern slavery.

As communicated in 2021, CEWA is committed to work with the highest risk, highest spend Tier 1 suppliers by providing due consideration to known geographic, commodity and industry modern slavery indicators. In time, CEWA will extend that oversight to the extended CEWA supply chain.

* Figures relate to third-party suppliers to CEWA schools and offices.

Criterion 3: Modern Slavery Risks (continued)

As at December 2025 CEWA supported

12,962

teaching and non-teaching jobs

\$2.37bn

GVA contribution in 2021; 17% of total
WA Education and Training sector

Operational Risks

CEWA's people

As at December 2025, CEWA Ltd supported 12,962 teaching and non-teaching jobs, 80% of which were female*. In 2021, it was estimated that CEWA's total Gross Value-Added contribution to the WA economy was approximately \$2.37 billion, representing almost 17% of the WA Education and Training sector, per year.

CEWA recognises the need for heightened due diligence across areas that are known to be at high risk of modern slavery, including cleaning contractors, and aims for employment documentation and contractor/ subcontractor engagement documentation to reflect the same commitment to ensuring due diligence and active monitoring. CEWA has well-documented and communicated policies, Executive Directives, and processes in place to ensure compliance with national and state employment law and legislation throughout the System. The *Executive Directive - Employment in Schools* is regularly reviewed and updated to ensure any changes in law and legislation are reflected accordingly.

If a case of modern slavery was suspected, it would be fully investigated, and appropriate disciplinary action would be taken against any member of staff found to have acted in breach of any CEWA policies.

Research

Recognising that management of modern slavery risks calls for a collaborative, multi-stakeholder approach, CEWA takes an ethical human rights approach to the approval of research applications that provides transparency of disclosure and the integration of decision-making oversight into all operational aspects.

The Executive Director is responsible for two forms of research that are facilitated across CEWA:

- research that occurs in CEWA schools or offices; and
- research commissioned by CEWA, engaging outside organisations, for system improvement purposes.

All research is quality controlled by the Australian Government document *National Statement on Ethical Conduct in Human Research 2007 (2018 Update)*. Each researcher is required to place their research under the scrutiny of a registered Human Research Ethics Committee, which uses the National Statement to assure ethical approaches including the rights, safety, fair treatment and needs of all participants. This is especially important for those from vulnerable populations, such as migrant families, whose families are engaged in high-risk work practices, such as third-party labour hire or who work in high-risk product or service areas, such as cleaning or construction. The CEWA research approval process provides a further layer of scrutiny, which, among other things, considers any issues associated with coercive practices related to modern slavery.

Any research partnerships negotiated with CEWA would take into consideration the good standing, past and existing ethical conduct of the proposed partner, including any connection to the coercive practices of modern slavery by that organisation and any entities known to be linked to them.

* These figures include staff in CEWA schools and offices, including casual staff.

Criterion 3: Modern Slavery Risks (continued)

CEWA had investments of
\$167.9m
during the reporting period.

Investment Risks

CEWA had approximately \$167.9 million in investments during the reporting period. CEWA recognises that investment activities also provide a connection to companies and organisations that may have varying commitments to upholding human rights. The activities of these organisations will also have repercussions on the lives and vulnerabilities of people engaged at various stages of their operations and supply chains; as such there is a real ethical, safety and human rights issue. CEWA recognises there is a direct stewardship responsibility that results from this potential risk that requires assessment and management of potential modern slavery risks in investment portfolios.

CEWA is committed to a holistic approach to human rights due diligence across all operations, including CEWA's investment activities. CEWA works closely with investment advisors to ensure that investment advice and recommendations adequately consider the oversight and due diligence of potential investment opportunities, especially where these opportunities are in sectors known to be at increased risk of labour and human rights abuse. It is intended that proactive inquiry into the modern slavery readiness and the transparency and effectiveness of companies' responses will form the basis of this work.

In line with CEWA's investment approach, which summarises the organisation's approach to investments, CEWA's investment managers are signatories of the *United Nations Principles of Responsible Investment* and share CEWA's commitment to assessing environmental, social and governance (ESG) concerns (including human rights issues, such as modern slavery) in investment decisions. ESG considerations are integrated into investment decisions and CEWA remains vigilant of these matters to ensure that they are fit for purpose. CEWA's investment managers provided regular reports to CECWA that include their commitment to responsible investing.

The investment manager for the CEWA Long Service Leave Fund (LSL), JBWere, are bound by the Investment Policy Statement (IPS), outlining the key criteria for CEWA's responsible investing activities. This specifically states that the investment managers will seek to avoid direct investment in those companies with a red flag as assessed by Morgan Stanley Capital International (MSCI), for Modern Slavery/Labour Rights Controversy. This is defined as a company that is involved in controversies related to labour-management relations, employee health and safety, collective bargaining and unions, discrimination and workforce diversity and management of supply chain employee relations standards.

As detailed in the LSL Fund's December Quarter 2025 Investment Report, from the total 60 Australian and International equity holdings invested in, 60% of these have not been involved in any major recent controversies regarding modern slavery/labour rights; 33% have been involved in recent moderate level controversies; and 7% have been involved in one or more recent severe structural controversies that are ongoing. There are no investments in companies that have been involved in very severe, red flag controversies.

Criterion 3: Modern Slavery Risks (continued)

Supply Chain Risks

In 2023, CEWA appointed a provider (Zycus Cognitive Procurement) to implement a procurement system that will increase CEWA's understanding and oversight of risks of modern slavery in supply chains and operations, and to enable the organisation to work toward the mitigation and eradication of these risks through responsible procurement. CEWA will continue the process of engaging effectively with suppliers in two ways:

- identifying suppliers in high-risk categories to promote education and information around modern slavery risks through the support of ACAN; and
- embedding appropriate oversight and documentation into the onboarding of both new and existing suppliers and assessing the risk of modern slavery during formal market assessment activities.

The onboarding of suppliers through CEWA's procurement system commenced in March 2025 including an increased compliance with Modern Slavery and supplier categorisation, based on the ACAN Category Risk Taxonomy. This was followed by the commencement of the full implementation of the procurement system at CEWA offices from March 2026, bringing improved conformance, reporting and data capabilities. CEWA will commence full implementation of the procurement system from June 2026.

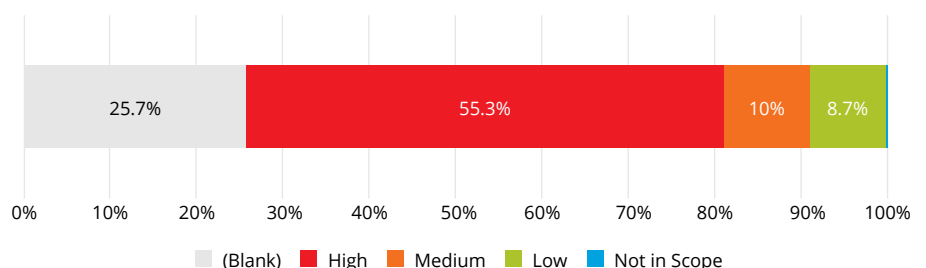
CEWA continues the process to analyse supply chains, especially for high-risk products and geographies, particularly in high-risk and high-spend categories.

CEWA's highest risks areas continue to be identified:

- in the construction industry – both in labour hire and sourced materials;
- in outsourced, labour intensive and low-skilled work, particularly facilities management including cleaning and security; and
- in extended supply chains, especially beyond Tier 1 suppliers.

The table below illustrates the percentage of spend per risk taxonomy for 2025. Compared to 2024, the percentage of unclassified spend decreased considerably: from 80% in 2024 to 25.7% in 2025. This reflects the better integration and application of the risk taxonomy, indicating an improvement in the quality of risk assessments previously not undertaken.

%GT Sum of Entity Total Spend - 2025 by ACAN Taxonomy Risk - Entity



Criterion 4

Actions Taken to Assess and Address Modern Slavery Risks

Actions taken in 2025

Throughout 2025, CEWA continued its commitment to modern slavery prevention, aligned with both the *CECWA Strategic Initiatives 2030* and *Quality Catholic Education (QCE)*. CEWA has maintained membership with the Australian Catholic Antislavery Network (ACAN), a collaboration of 50 Catholic entities throughout all states and territories of Australia.

ACAN Supplier Engagement

The ACAN 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.

- Evaluation of the modern slavery risk within operations and supply chains, using the ACAN Risk Taxonomy.
- ACAN Supplier Survey to identify supplier revenue, number of employees, countries of origin for goods sourced overseas, workforce contractual arrangements and Sedex membership status.
- 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.
- Onboarding suppliers to Sedex requires a business address, contact details and goods or services provided.
- Sedex Self-Assessment Questionnaire (SAQ) helps suppliers to evaluate their practices against established standards and identify areas for improvement.
- Desktop review to identify key actions required from suppliers.
- Enhance supplier screening using Know Your Client (KYC) intelligence software.
- Corporate Social Compliance Audits provide a point in time, objective and independent verification process of supplier alignment with local laws and worker wellbeing standards.
- Domus 8.7 Index modern slavery statement assessment on selected suppliers in high-risk categories.
- ACAN Pre-qualified Supplier Directory - a list of preferred suppliers accessible to Catholic organisations.

Zycus Procurement System

During 2025, CEWA continued the roll out of the Zycus procurement system. The introduction of this centralised procurement system will ultimately reduce supplier risk across the organisation, at CEWA schools and offices. Among other benefits of a centralised procurement system, Zycus will introduce a central database of supplier data, instead of the current practice of individual schools managing their own supplier

Criterion 4: Actions Taken to Assess and Address Modern Slavery Risks (continued)

database. This central database will allow for categorisation of suppliers, as well as identification of high-risk categories, which will enable a system-response to mitigate any modern slavery risks. Contracts will be centrally reviewed before execution, to allow for amendment or deletion of any unacceptable terms and conditions that might pose a modern slavery risk. In addition, as part of Zycus, CEWA will introduce purchase orders across the entire system, which will lead to improved payment times to suppliers and, ultimately, their employees.

Implementation of the procurement system commenced in August 2023. Supplier onboarding, to enable the categorisation of suppliers and assessment against key risk criteria that include modern slavery, commenced in 2025, with CEWA offices going live with full functionality from March 2026, followed by a phased rollout to all CEWA schools over the course of the rest of 2026 and into 2027.

Laudato Si' Sustainability Strategy

In January 2025, CEWA commenced the implementation of its first *CEWA Laudato Si' Sustainability Strategy*, called to action by Pope Francis' Encyclical *Laudato Si'* and the Fifth Plenary Council Decree 8. The *CEWA Laudato Si' Sustainability Strategy* is supported by an annual Action Plan, based on the framework provided by the Vatican Dicastery for Promoting Integral Human Development via the *Laudato Si'* Action Platform. Input from schools, offices, First Nations and Church agencies helped build the Strategy and Action Plan. The 2025 Action Plan included CEWA's commitment to modern slavery prevention as one of the actions under *Laudato Si'* Goal 2: Response to the Cry of the Poor.

Domus 8.7

CEWA 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.

Domus 8.7 provides CEWA with:

- 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; and
- a documented process to assess if an organisation has caused, contributed or is directly linked to modern slavery and modern slavery indicators.

Criterion 4: Actions Taken to Assess and Address Modern Slavery Risks (continued)

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 or supply chain actors. Supports may include:

- modern slavery indicator assessment;
- needs assessment, case coordination, response and remediation planning;
- referrals to community, social services and 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; and
- 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.

Our Plans Beyond 2025

Through its Modern Slavery Action Plan 2026–2028, CEWA will continue to monitor and improve processes and actions to address modern slavery risks on an ongoing basis. CEWA undertakes, and will continue to undertake, the following oversight and review of the effectiveness of the implementation plan:

- Continue to participate in the ACAN Modern Slavery Risk Management Program.
- Continue to embed the *Executive Directive – Modern Slavery Prevention* across the CEWA System (schools and offices).
- Regular reporting through the CEWA Executive Team to CECWA, as appropriate.
- Reviewing community and staff engagement initiatives, including e-learning.
- Continuing to be vigilant to and process concerns or reports, including whistleblower disclosures, relating to modern slavery.
- Continue to strengthen engagement with suppliers to communicate the expectations relating to the prevention of modern slavery at the onboarding process.
- Through the further implementation of the centralised procurement system, Zycus, across CEWA schools and offices, further advance procurement processes that enable identification of high-risk categories, monitoring of suppliers and, where appropriate, a review of the implementation of any corrective action plans.

Criterion 5

Assessing Effectiveness

In assessing the effectiveness of the work to date, CEWA is guided by the relevant legislation with interpretation guided by Catholic Social Teaching principles.

Collaboration is at the heart of accelerating progress. This also includes opportunities to comparatively measure social, environmental and governance risks and actions with peers in our network.

In its foundational stages, CEWA 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 SAQ by CEWA is a substantial measure of continuous improvement year on year. Below is an explanation of how scoring is calculated using the Sedex SAQ and CEWA's 2025 risk scores and management controls that will serve as our benchmark for continuous improvement.

Explanation of Scoring

Combined Risk Score 4.1/10

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 2.9/10

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.

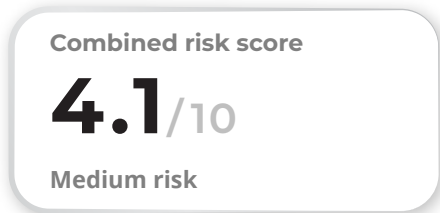
- **Labour Standards Pillar** - assesses location and industry factors that could increase labour risks, such as vulnerable worker populations or high rates of workplace violations.
- **Health and Safety Pillar** - considers regional and industry-specific health and safety risks, including local regulations 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.

Criterion 5: Assessing Effectiveness (continued)

Site Characteristics Risk Score 6.2/10

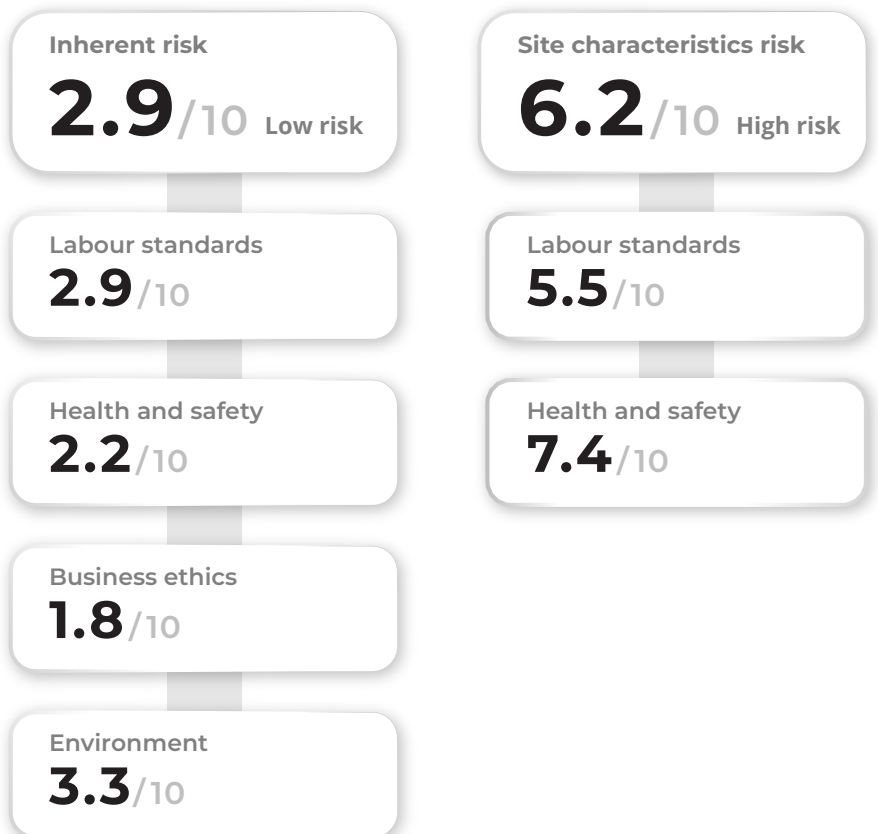
Highlights potential risks based on our suppliers' SAQ responses in the Labour Standards and Health and Safety pillars. This score can be used to assess and support the implementation of policies and processes that mitigate workplace risks within your supply chain. For the Environment SAQ, site characteristics 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.



Score breakdown by pillar

Highlight strengths and opportunities to help businesses focus their efforts on key areas that drive ethical and sustainable practices.



Criterion 5: Assessing Effectiveness (continued)

Management Controls Score 3.6/5

This 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.

Management controls

3.6/5

Good

Measures suppliers' risk management (0–5, with 5 as best) to assess effectiveness and target improvements.

Labour standards

3.4/5 Good

Health and safety

3.8/5 Good

Business ethics

4.5/5 Advanced

Photo: Liverpool International Academy at Irene McCormack Catholic College (Butler)



Criterion 5: Assessing Effectiveness (continued)

Section title	Points available	Points achieved	% of points achieved	Score
Profile	1	1	100%	5.0 (Advanced)
Management systems	31	25	80.6%	4.1 (Advanced)
Freely chosen employment	19	10	52.6%	2.7 (Moderate)
Freedom of association	7	7	100%	5.0 (Advanced)
Health and safety	58	46	79.3%	4.0 (Advanced)
Living accommodation	99	74	74.7%	3.8 (Good)
Working hours	6	6	100%	5.0 (Advanced)
Discrimination	41	20	48.8%	2.5 (Moderate)
Discipline and grievance	34	24	70.6%	3.6 (Good)
Communities and human rights	12	7	58.3%	2.9 (Moderate)
Business ethics	10	9	90%	4.5 (Advanced)

The ACAN baseline data table provides a comparative measure of supplier engagement and program activities to measure progress and inform future action planning.

Activity	2024	2025
Hours spent on modern slavery activities	20	100
Individual staff completed e-learning	14	0
E-learning modules completed	11	0
Total number of suppliers	26,942	17,266
Number of suppliers with visible contact information and ABN	261	93
Number of suppliers across high-risk categories	2,396	1,901
Number of ACAN Supplier Surveys completed	667	1,392
Supplier staff attending capacity building webinars	50	27
Invited to join Sedex	160	143
Joined Sedex	93	119
Sedex SAQ completed	79	102
Social audits	12	16
Corrective actions	53	113
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

Criterion 6

CEWA does not own or control any entities.

Consultation with Owned or Controlled Entities

Criterion 7

No other relevant information.

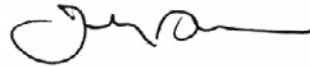
Any Other Relevant Information

Photo: Lumen Christi College (Martin), Good Shepherd Catholic Primary School (Kelmescott), Sacred Heart Primary School (Thornlie) and St Munchin's Catholic School (Gosnells)



This Modern Slavery Statement 2025 was endorsed by the CEWA Executive Team and approved by the Catholic Education Commission of Western Australia, the board of Catholic Education Western Australia Limited, on 5 June 2026, in accordance with the requirements of the *Modern Slavery Act 2018* (Cth).

Signed



Timothy Shanahan

Chair

Catholic Education Commission of Western Australia

Commissioners of Catholic Education Western Australia Limited 2025

Eva Skira AM	CECWA Chair
Jonathon Woolfrey	CECWA Deputy Chair
Bishop Michael Morrisey	Commissioner
Donella Brown	Commissioner
Wojciech Grzech	Commissioner
Celia Hammond	Commissioner
Dr Frank Malloy	Commissioner
John Palermo	Commissioner
Peter Yensch	Commissioner

CEWA Executive Team 2025

Executive Director	Wayne Bull (until July 2025) Annette Morey (from July 2025)
Deputy Executive Director	Annette Morey (until July 2025) Julie Hornby (from July 2025)
Director Finance, Infrastructure and Digital Technology	Dr Glenda Scully
Director School Improvement and Wellbeing	Dan Wood
Director People and Culture	Paul Andrew
Director Teaching and Learning	Mandy Connor
Director Religious Education	Rev Mark Powell



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