



# MODERN SLAVERY STATEMENT

## Australia 2025



# The Salvation Army Statements

## Our Movement

The Salvation Army is an international Christian movement, united by faith and giving hope where it's needed most.

Since our foundations in 19th century London, we express our faith in charitable work to provide both spiritual and social support, with one hand reaching out to God and with the other reaching out to the world.

## Our Mission

The Salvation Army is a Christian movement dedicated to sharing the love of Jesus.

We share the love of Jesus by:

### CARING FOR PEOPLE

Being there when people need us most

We offer care and compassion as a sacred encounter with transformative potential

### CREATING FAITH PATHWAYS

Taking a holistic approach to the human condition that values spirituality

We graciously share the Good News of Jesus and grow in faith together

### BUILDING HEALTHY COMMUNITIES

Investing ourselves in relationships that promote mutual flourishing

We find the wholeness God intends for us in community

### WORKING FOR JUSTICE

Tackling the social systems that harm creation and strip away human dignity

We join God's work to build a fairer world where all can thrive

## Our Vision

Wherever there is hardship or injustice, Salvos will live, love and fight, alongside others, to transform Australia one life at a time with the love of Jesus.

## Our Values

Recognising that God is already at work in the world, we value:

### INTEGRITY

Being honest and accountable in all we do

### COMPASSION

Hearing and responding to pain with love

### RESPECT

Affirming the worth and capacity of all people

### DIVERSITY

Embracing difference as a gift

### COLLABORATION

Creating partnerships in mission

## The Inclusion Statement



The Salvation Army Australia acknowledges the Traditional Owners of the land on which we meet and work and pay our respect to Elders, past, present, and future. We value and include people of all cultures, languages, abilities, sexual orientations, gender identities, gender expressions, and intersex status. We are committed to providing programs that are fully inclusive. We are committed to the safety and well-being of people of all ages, particularly children.

## Contents

### 12 HIGHLIGHTS

The Salvation Army highlights 2024-2025

### 18 SUPPLY CHAINS

The Salvation Army supply chains

### 28 MANAGING MODERN SLAVERY RISKS

What we are doing to manage Modern Slavery risks in our supply chain

### 34 EVALUATION FRAMEWORK

Financial year 2025

4 Message from the Territorial Commander

5 Message from the Chief Secretary

6 Who we are

10 The Salvation Army Australia's structure

14 What we do - our services, activities and operations

23 Identification of Modern Slavery risks in The Salvation Army Australia's supply chains and operations

26 Oversight of Modern Slavery

32 How we are assessing the effectiveness of our management of Modern Slavery risks in our supply chains and operations

36 How we are working together to combat Modern Slavery risks in our supply chains and operations

36 What else we are doing to fight Modern Slavery

## Message from the Territorial Commander

As many people, in Australia and beyond, remain in the bonds of modern slavery, The Salvation Army continues to work for the freedom of every individual.

While enhancing our supply chain governance practices to ensure that our assets are ethically sourced, we are also careful to ensure that we do not cause or contribute to hardship or injustice in our procurement practices.

As both a church and a charity, we are critically aware of the need to locate and assist those who need to be set free from slavery in any of its forms. In Australia, our Additional Referral Pathway program, currently piloted until 28 November 2025, gives people in conditions of slavery options for reporting their captors and receiving help, both to escape their situation and to re-establish their lives after slavery. This is especially important for those who are not comfortable with reporting to police in the first instance.

As one of the largest providers of social services and programs for people experiencing hardship, injustice or social exclusion, The Salvation Army works around Australia, with every demographic and every age group, to meet human need without discrimination.

By speaking and acting for all who need our protection and help, we pursue our vision of transforming Australia, one life at a time, with the love of Jesus. We will always fight for the right of all people to live freely and well.

God bless you.



**Miriam Gluyas (Commissioner)  
Territorial Commander,  
Chair of the Board,  
Australia Territory**

## Message from the Chief Secretary

The Salvation Army Australia continues to progress on its journey in responding to the complex issue of modern slavery, as we live our vision of seeing lives transformed with the love of Jesus.

The 2025 reporting period has been yet another challenging year, particularly with escalating cost of living pressures, which continue to exacerbate vulnerability and demand for those we serve.

As we continue to manage modern slavery risks in our operations and supply chains, this year we have improved our detection and response processes and strengthened general awareness amongst our personnel. Further, we have embedded a centralised responsible sourcing approach to all sourcing and procurement activities.

I am pleased to report The Salvation Army Australia's progress this year towards recognising and reducing modern slavery risks, and I acknowledge wholeheartedly that this is the result of an aggregated effort by many of our teams and suppliers.

I also acknowledge that this statement presents an opportunity to share the work we are undertaking above and beyond a compliance-based approach, noting that it will expand in future reporting periods for long-term, sustainable results.

God bless you.



**Winsome Merrett (Colonel)  
B.Sp.Thy., MA Arts (Theological  
studies) A.Mus.A  
Chief Secretary  
Australia Territory**



## Who we are

Across Australia – in cities, country towns and rural communities – our work touches every demographic and age group. We're involved in national issues while also bringing hope to people who may be experiencing hardship or injustice.

This Joint Modern Slavery Statement is submitted on behalf of the following incorporated and unincorporated entities under section 14 of the *Modern Slavery Act 2018* (Cth) for the reporting period 1 July 2024 to 30 June 2025.

- The Salvation Army Australia (unincorporated association)
- The Salvation Army (New South Wales) Property Trust ABN 57 507 607 457
- The Salvation Army (Northern Territory) Property Trust ABN 65 906 613 779
- The Salvation Army (Queensland) Property Trust ABN 32 234 126 186
- The Salvation Army (South Australia) Property Trust ABN 13 320 346 330
- The Salvation Army (Tasmania) Property Trust ABN 94 917 169 560
- The Salvation Army (Victoria) Property Trust ABN 64 472 238 844
- The Salvation Army (Western Australia) Property Trust ABN 25 878 329 270
- The Salvation Army (Australia) Redress Limited ABN 94 628 594 294
- Salvation Army Housing ABN 59 608 346 934
- Salvation Army Housing (Victoria) ABN 85 133 724 651
- Salvos Legal Limited ABN 14 147 213 214
- Salvos Legal (Humanitarian) Limited ABN 36 147 212 940
- The Salvation Army Community Housing Service ABN 47 152 257 728

#### **The reporting entities:**

The Salvation Army is a worldwide, unincorporated association, led by the person appointed from time to time holding the office of the 'General of The Salvation Army'. The General is a corporation sole and is the actual trustee of two separate trusts, known as 'The Social Work Trust' and 'The General Work Trust'. In order to hold property and conduct operations of The Salvation Army around the world, there are a range of different legal structures in place. In Australia, the relevant legal vehicles are the State/Territory-based statutory corporations, each given the name 'The Salvation Army ([State/Territory]) Property Trust' ('the Property Trusts').

#### **The Property Trusts were established and / or are authorised under each of the following Acts of Parliament:**

- (a) The Salvation Army (New South Wales) Property Trust Act 1929 (NSW);
- (b) Salvation Army (Queensland) Property Trust Act 1930 (Qld);
- (c) Salvation Army (Tasmania) Property Trust Act 1930 (Tas);
- (d) The Salvation Army (Victoria) Property Trust Act 1930 (Vic);
- (e) The Salvation Army (South Australia) Property Trust Act 1931 (SA);
- (f) The Salvation Army (Western Australia) Property Trust Act 1931 (WA);
- (g) Salvation Army Property Trust Act 1934 (ACT); and
- (h) Salvation Army (Northern Territory) Property Trust Act 1976 (NT).

The Property Trusts are not actually trusts themselves; they are corporate trustees of the General Work / Social Work Trusts. Officers of the Property Trusts are constituted as a body corporate called 'The Trustees', consisting of individuals appointed from time to time by the General of The Salvation Army.

Essentially, the difference between the Social Work and General Work Trusts lies in the purposes for which the assets of each of those trusts can be applied. The Social Work is essentially social / benevolent work; The General Work is essentially religious work.

The Social Work Trust is a Public Benevolent Institution with deductible gift recipient status. The General Work Trust is a Charitable Institution.

Some employees and other non-employee personnel (e.g. Clergy) within The Salvation Army are employed / engaged under the General Work Trust (usually Corps [Church] based / religious workers). Others are employed / engaged under the Social Work Trust. Even further still, some personnel are apportioned partly under General and partly under Social (e.g. 50% of their time is classified as being related to General Work and 50% Social Work), based on the role and responsibilities of the individual.

#### **The following companies limited by guarantee are wholly owned by The Salvation Army (New South Wales) Property Trust:**

- i. Salvos Legal Limited ABN 14 147 213 214
- ii. Salvos Legal (Humanitarian) Limited ABN 36 147 212 940
- iii. The Salvation Army Community Housing Service ABN 47 152 257 728

#### **The following company limited by guarantee is wholly owned by The Salvation Army (Victoria) Property Trust:**

- iv. Salvation Army Housing (Victoria) ABN 85 133 724 651

#### **The following company limited by guarantee is jointly owned by the Northern Territory, South Australia, Tasmania and Western Australia Property Trusts:**

- v. Salvation Army Housing ABN 59 608 346 934

#### **The following company limited by guarantee is jointly owned by the Property Trusts:**

- vi. The Salvation Army (Australia) Redress Limited ABN 94 628 594 294

Throughout this Joint Modern Slavery Statement, unless otherwise specifically indicated, the companies listed above at (i)-(vi) are collectively referred to as the 'Companies'.

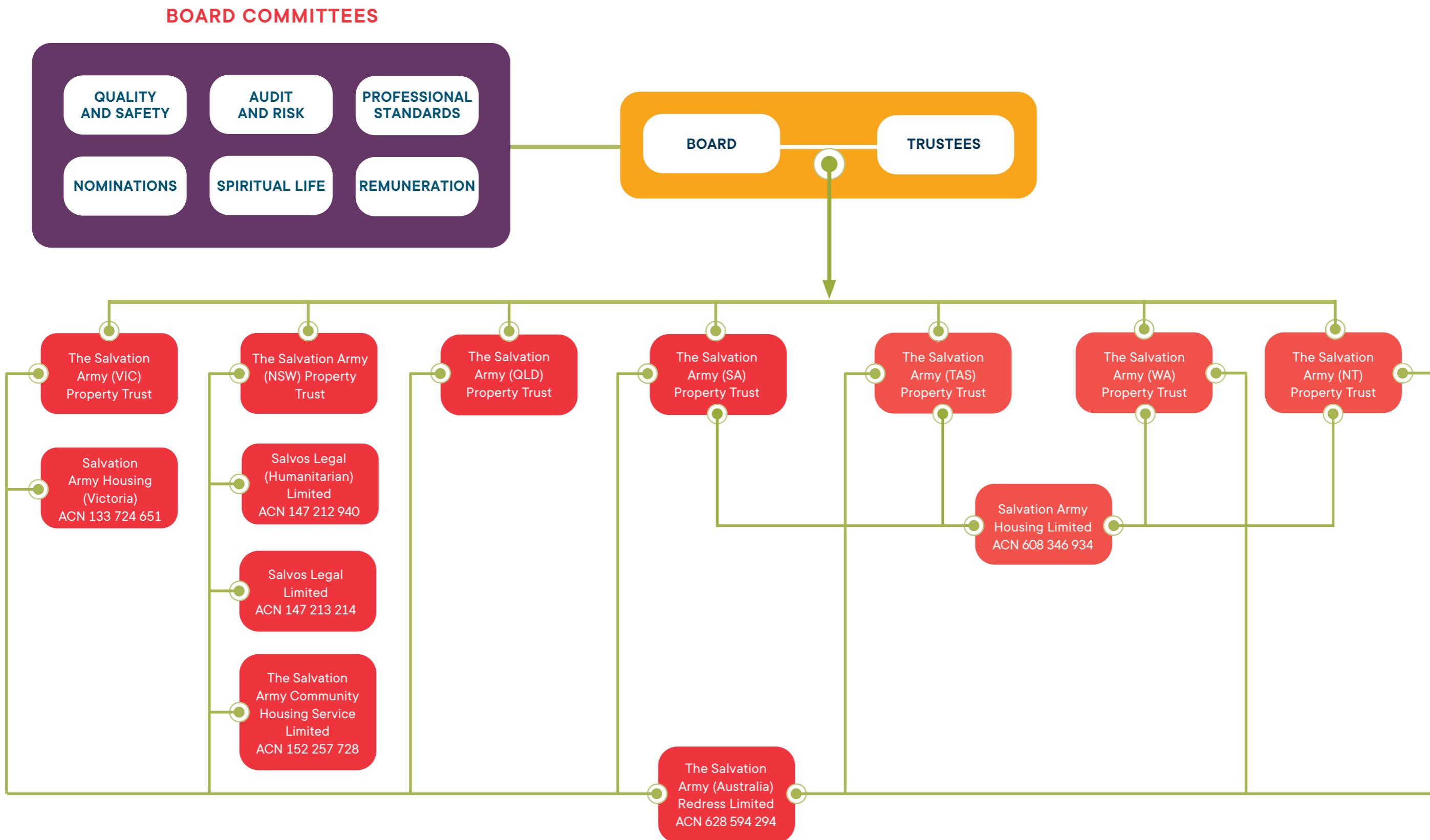
Throughout this Joint Modern Slavery Statement, unless otherwise specifically indicated, all of the above entities / bodies are collectively referred to as 'The Salvation Army Australia'.

Each of the above entities / bodies consisting of The Salvation Army Australia are charities registered with the Australian Charities and Not-for-profits Commission ('ACNC') and as such, are subject to the ACNC Governance Standards.

In 2018, The Salvation Army Australia established a body known as The Salvation Army Australia Territory Board (the 'Board'), which, together with the Trustees is responsible for effectively representing and promoting the interests of The Salvation Army Australia, with a view to adding long term value to the movement's mission. The purpose and objects of the Board are to provide governance oversight to The Salvation Army Australia in accordance with law; to strategically position The Salvation Army Australia so that it has a sustainable, major influence on Australian society; and to provide advice and assistance to the Trustees in the discharge of their responsibilities.

Members of the Board are appointed by the General of The Salvation Army, on recommendation of the Chair of the Board, who is the General's personal representative in Australia, known as the Territorial Commander.

# The Salvation Army Australia's structure



# The Salvation Army Australia Service Highlights FY2024/25

Nearly 1.75M sessions of care provided



228,500+ people assisted



ACROSS ALL OUR SOCIAL PROGRAMS

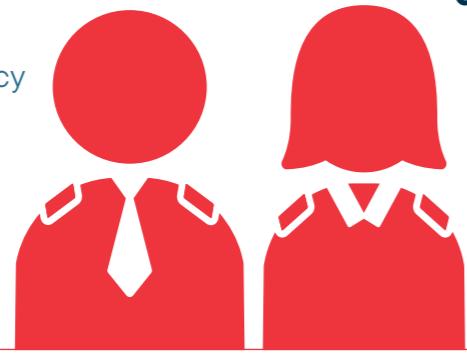
1.05M+ nights of accommodation were provided across all our social programs

\$24.1M+ of financial assistance provided in cash, gift cards, vouchers, bill payment and disaster relief

FAITH MINISTRY

22,600+ people supported through chaplaincy

11% increase in number of church attendances compared to last year



548,000+ of church attendances on Sundays and weekdays



266,000+ meals provided by corps



EMERGENCY RELIEF & COMMUNITY SERVICES

\$18.3M+ of financial assistance provided

136,700 people assisted



52,000+ people received food parcels



29,000+ people received

MONEYCARE

Nearly 11,000 people provided financial counselling



FAMILY & DOMESTIC VIOLENCE

12,600+ people supported who experienced family violence



YOUTH

59,500+ bed nights provided to young people at risk of, or experienced homelessness

Nearly 1050 young people assisted with learning how to drive

EPLUS

More than 42,000 job seekers assisted to look for employment



10,300+ job seekers gained employment

AGED CARE

More than 157,700 visits to people who received in-home care



HOMELESSNESS

38,000+ people assisted who were homeless or at risk of homelessness

1.4M+ meals provided

to people who accessed homelessness services



ADDITION

More than 220,000 sessions of care provided to people impacted by addiction

SALVOS STORES

52M items kept in circulation and out of landfill



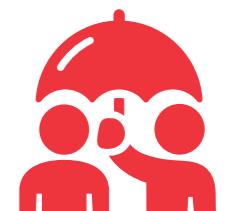
EMERGENCY SERVICES

650 responses to disasters such as fires, floods or power outages.

46% increase in the number of volunteers

SALVOS FUNERALS

600 families served with 'at-need' funeral services



# What we do - our services, activities and operations



## Corps

The Salvation Army is a worldwide Christian church. Our local churches (known as corps) offer a community presence around the country. We provide a wide variety of spiritual and social activities such as church services, prayer meetings, men's and women's groups and community support services. Our faith convinces us that hope, purpose and fulfilment can be everyone's story. Whether you're looking for connection, guidance or a community of like-minded people, The Salvation Army welcomes you.



## Disaster and Emergency Recovery

The Salvation Army Emergency Services (SAES) have served Australian communities for over 40 years. Whether it's a natural disaster or a missing person search, SAES volunteers are among the first to arrive on the ground, providing immediate, medium and long-term support to victims and emergency personnel on the front line. Services provided aim to meet people at their point of need and this help doesn't stop when the crisis has passed.



## Youth Support Networks and Programs

The Salvation Army's network of youth services offers targeted programs that support and engage youth across Australia as they transition to independence. Pathways include accommodation and material aid, drug and alcohol counselling, youth justice, mental health and advocacy support, education and training, driver training, creative arts and multimedia, safe places and support to build a better future.



## Alcohol and Other Drug Recovery

The Salvation Army offers several services and programs across Australia that provide safe and high-quality support for people adversely affected by alcohol and drugs. These services help encourage a sense of hope and freedom, and enable those affected to pursue a holistic transformation, which improves outcomes for not just themselves but also their families and communities.



## Moneycare

The Salvation Army's Moneycare service provides information, support and advocacy to assist people in financial difficulty. Our qualified team offers free and confidential financial counselling to people from all walks of life and understand that everyone's finances are different. They offer step- by-step advice and help with:

~Financial coaching ~Financial counselling

THE SALVATION ARMY AUSTRALIA IS HEADQUARTERED IN BLACKBURN, MELBOURNE, SUPPORTED BY AN OFFICE IN REDFERN, SYDNEY, HOWEVER, OPERATES IN ALMOST EVERY POSTCODE WITHIN AUSTRALIA.

## Salvos Housing

Salvos Housing is a community housing organisation. Homes are provided for individuals and families who are homeless or at risk of homelessness, are on low incomes and those with specific support needs. We run a range of programs which include Long Term, Transition Housing Management, Crisis Housing and rooming house properties.



## Red Shield Defence Services

The Salvation Army Red Shield Defence Services (RSDS) in Australia provides the Australian Defence Forces with practical, emotional and spiritual support in difficult times, times of grief and in the everyday. We support members and their families according to their needs. Whether it be a chat over a cuppa, a referral or a prayer, we want to be there. Where there's a need, we are here to support our troops as they serve our country and risk their lives in the line of duty.



## Property Management and Development

The Salvation Army property solutions are designed to best support mission delivery at a local level. This includes sales and leasing, facility management and development to build and fit-out premises that best meet mission and business requirements. A centralised approach to property management enables stewardship of the portfolio for maintenance of a sustainable resource, which will continue to support the future financial and operational needs of The Salvation Army.



## Doorways

Doorways provides emergency financial relief and holistic case management with referral to internal and external support services. Each year thousands of individuals and families come to The Salvation Army for help meeting day to day expenses or paying unexpected bills. Our aim is to journey with individuals to find long-term solutions to their struggles with the goal to end the cycle of poverty.



## Aboriginal and Torres Strait Islander Programs

The Salvation Army respects, values and acknowledges the unique histories and languages of the Aboriginal and Torres Strait Islander communities and aims to walk alongside them, to improve outcomes through social programs. At the heart of all work is a commitment to reconciliation – a faith movement committed to social justice, equity and freedom. Reconciliation Action Plans (RAPs) are a key vehicle for driving the reconciliation processes.



## Microfinance

Microfinance provides small no-interest loans for essential items or services that help to build capability and provide an alternative for "predatory" commercial very high-interest loans. No-interest loans are a safer way to pay e.g. household items or car-related expenses. The Salvation Army's Microfinance service is available across Australia, and our team can assist community members as needed.



# What we do - our services, activities and operations (cont.)



## Family Domestic Violence

The Salvation Army provides a wide range of services around the country to support women and women with children impacted by family and domestic violence. We understand that experiencing family violence can be frightening and isolating. We offer refuge, children's and parenting services, counselling, support, men's programs, accommodation and advice to women and children who are experiencing, or who have experienced, family violence.



## Homelessness Services

The Salvation Army has a long and successful history in responding to the immediate needs of those experiencing or at risk of homelessness. While services may vary depending on location, they are united by a singular purpose – to end homelessness, transform lives and restore hope and dignity. Catering to different stages of homelessness, these services also help those affected connect with a range of services aimed at helping them get back on their feet.



## Eva Burrows College

Eva Burrows College is the national learning centre of The Salvation Army. Drawing from our cutting-edge experience, the college exists to encourage and empower people for life, mission, and service through our nationally recognised and accredited courses. We can provide a comprehensive learning pathway that integrates practical experience with formal qualifications. We have campuses in Melbourne and Sydney and also offer online and blended learning.



## Salvos Funerals

Salvos Funerals is a Salvation Army initiative that offers compassionate and affordable care to those in grief. By working with our trusted partners, Salvos Funerals provides real value for quality services. We are here to help people and thoughtfully plan and manage what can be an overwhelming task. Salvos Funerals is entirely owned and operated by The Salvation Army, with all profits reinvested into our charitable works.



## Salvos Stores/Family Stores/Thrift Shops

Our Salvos Stores and op shops specialise in the sale of pre-loved items generously donated by the Australian public. Ranging from our family stores and thrift shops to our well-known Salvos Stores, all our stores sell quality used goods, including furniture, clothing and shoes, homewares and books. All profits made through our stores go to funding Salvation Army programs and services around Australia.

## Fundraising and Financing

The primary goal of The Salvation Army Australia's fundraising is to raise funds by inspiring the hearts of our supporters, unlocking their generosity and journeying with them to enable The Salvation Army Australia's mission. The primary annual fundraising campaigns are the Red Shield Appeal and Christmas campaign. The Salvation Army Australia's mission is also funded through investment activities. Funds are invested to further the achievement of mission objectives and include equity, hybrid and fixed interest instruments.



## Aged Care

The Salvation Army aims to promote a unique experience of choice, lifestyle and belonging for all people as they age. Our Aged Care services span across Australia in twenty residential aged care centres, seven retirement villages, one respite centre, and community care services. We offer support to people based on their needs — those older Australians who choose to live independently in their own home or those who require short-term or full-time care.



## Chaplaincy

The Salvation Army's network of Christian chaplains meet people at their point of need to provide support. They are committed to helping in any way they can, offering the highest level of professional confidentiality, no matter a person's belief. If people are interested, they are also happy to answer questions about God, faith, and spirituality. Our chaplains can provide support in schools, emergency services (police, fire brigade, etc), prisons and rural areas.



## The Salvation Army Employment Plus

The Salvation Army Employment Plus was established as an agency in 1998 by The Salvation Army Australia to deliver on the aim of helping people to find work that supports their wellbeing and benefits the community. As one of Australia's largest recruiters, we provide our job seekers with specialised training, work experience and a range of support services, to help them find meaningful employment. Everything we do is guided by our purpose of 'Work for All. Hope for all.'



## International Development Partnerships

The Salvation Army's International Development office supports community development by working in partnership with communities in Asia, Africa and the Pacific. Our focus is to work alongside communities to enable them to alleviate poverty. We believe that for any project to be successful it is crucial to train people and provide tools to enable them to achieve their full potential.



# The Salvation Army

## Australia's supply chains

The Salvation Army Australia is a diverse, national organisation, offering a wide variety of services across approximately 4,000 locations including churches (Corps), and a mix of commercial and residential buildings.

### Major spend categories

As our operations indicate, The Salvation Army Australia has a highly complex supply chain network of goods and services delivered by thousands of suppliers. Excluding payroll, the majority of our total annual spend occurs across the following 25 key categories:

### WORKFORCE COMPOSITION

The Salvation Army Australia manages its human resources utilising an operational model which integrates charitable and faith-based activities, is transparent, and in accordance with procurement and sourcing governance principles. We engage in excess of 43,000 personnel.



**9,800+**  
employees



**630+**  
ministers  
of religion



**450+**  
contractors



**32,000+**  
volunteers



Our top 10 spend categories (in order from highest spend) continue to be:

1. Property Management and Maintenance
2. Insurance
3. Contingent Labour
4. Information Technology and Communications
5. Fleet
6. Marketing, Advertising and Media
7. Utilities
8. Food and Catering
9. Gift Cards and Crisis Program Support
10. Stores Stock, Fittings and Consumables

# The Salvation Army Australia's supply chains

Due to the complexity of our operations and supply chains, mapping continues to be a long-term exercise, and we continue to try to simplify and consolidate our supply base as much as possible. For example, through a recent tender process for branded clothing, we reduced over 20 suppliers nationwide down to one preferred company.

The continued consolidation of procurement activity on a national basis further extends our desire to better map and control our supply base but there is still a great deal of work required to gain strong visibility across all of our major spend categories.

The greater scrutiny of our partner supply chains is also exposing roadblocks to effective supply chain mapping. This is particularly the case where suppliers believe sharing of their specific supply partner(s) supply chain generates commercial risk for them in having this exposed (i.e. concerns in relation to the potential for The Salvation Army Australia to circumvent their involvement and go 'straight to the source' of supply). We continue to work collaboratively with our suppliers to try to address these concerns.

Over this reporting period, we continued our supply chain mapping to improve transparency and identify areas where we require local partners to help verify working conditions. As in our previous statement, we have prioritised a select group of spend categories deemed to present salient risks to The Salvation Army Australia based on the amount of spend and/or inherent risk, with a key focus on apparel associated with our reviewed sourcing model in this spend category.

The map on the right lists these, along with information gathered thus far on where these goods/services were sourced. All Tier 1 suppliers are based in Australia.

The Salvation Army Australia faces two key challenges in knowing where our products and services are coming from:

1. Limited mapping of various product lines by Tier 1 suppliers, many of whom are retailers. In engaging these suppliers, we have learned that it tends to be only their own private label products that are fully mapped. Where they are sourcing name brands, they often rely fully on that company's due diligence programs and do not obtain supply chain information, which requires us to engage directly with Tier 2 companies, many of whom are reluctant to disclose information over commercial concerns;
2. The de-centralised nature of procurement processes, where service programs and churches require a level of autonomy in purchasing products and services in order to effectively and efficiently meet community needs.

We are managing this through our procurement-to-pay (P2P) system partner—Coupa—and through this, a maturing preferred supplier listing.

Over time, our goal is to steer the majority of organisational purchasing for major spend categories to a curated list of suppliers, vetted for demonstrated success and impact in supply chain assurance.

In addition, The Salvation Army Australia continued its relationship as a Strategic Partner of the Issara Institute—an independent non-governmental organisation (NGO) based in Asia and the U.S. tackling issues of human trafficking and forced labour through worker voice, partnership, and innovation.

As part of this initiative, we have commenced involving our strategic suppliers and sub-suppliers in a more concerted effort to map and share supply chain information to enhance our ability to prevent, detect and remediate serious rights abuses in our shared supply chains.



**Goods/service:** Gift cards

**Service/department:** Social Mission

**Purpose:** Emergency relief

**Sourcing locations:** Sweden, UK, possibly China

**Goods/service:** Mattresses/Furniture

**Service/department:** Salvos Stores and Social Mission

**Purpose:** Retail Services and Client Services

**Sourcing locations:** China (raw materials may come from: China, India, Thailand, Malaysia, Indonesia)

**Goods/service:** Apparel

**Service/department:** Enterprise wide

**Purpose:** Workwear

**Sourcing location:** Bangladesh, Hong Kong, China

**Goods/service:** Solar

**Service/department:** Property

**Purpose:** Emission reductions

**Sourcing location:** China

**Goods/service:** Rubber gloves

**Service/department:** Aged Care, Emergency Services and Community Outreach Programs

**Purpose:** Residential and Client Services

**Sourcing locations:** Malaysia, Thailand, China

**Goods/service:** Seafood

**Service/department:** Aged Care Services and Disaster Recovery

**Purpose:** Resident nourishment

**Sourcing locations:** Indonesia, Malaysia, Taiwan, Thailand, Vietnam, West Pacific

**Goods/service:** Beef

**Service/department:** Aged Care Services and Disaster Recovery

**Purpose:** Residential and Client Services

**Sourcing locations:** Australia, New Zealand

- A Tier 1 supplier is a manufacturer or service provider that sells products or services directly to TSA without a middleman
- A Tier 2 supplier is the 'suppliers of suppliers'
- A Tier 3 supplier is a supplier further down the supply chain, beyond direct and indirect tiers



## Identification of Modern Slavery risks in The Salvation Army Australia's supply chains and operations

As part of its Governance framework, The Salvation Army Australia's Enterprise Risk and Compliance and Strategic Sourcing and Procurement functions continue to consider Modern Slavery risks in its operations and supply chains to understand exposure and promote responsible and sustainable business practices through its Tier 1 supplier base.

The Salvation Army is a large organisation with several largely autonomous business units responsible for their own supply bases. While we continue to consolidate our spend through centralised Strategic Sourcing and Procurement activity, much of our sourcing activity remains 'local'. While this has enabled us to achieve some efficiencies, it also represents a key challenge in delivering responsible sourcing consistently across our organisation. A recent internal audit has highlighted the ongoing disbursement of procurement activity which will lead to greater centralisation and management during the next reporting period.

### Modern Slavery risks in our supply chains and operations

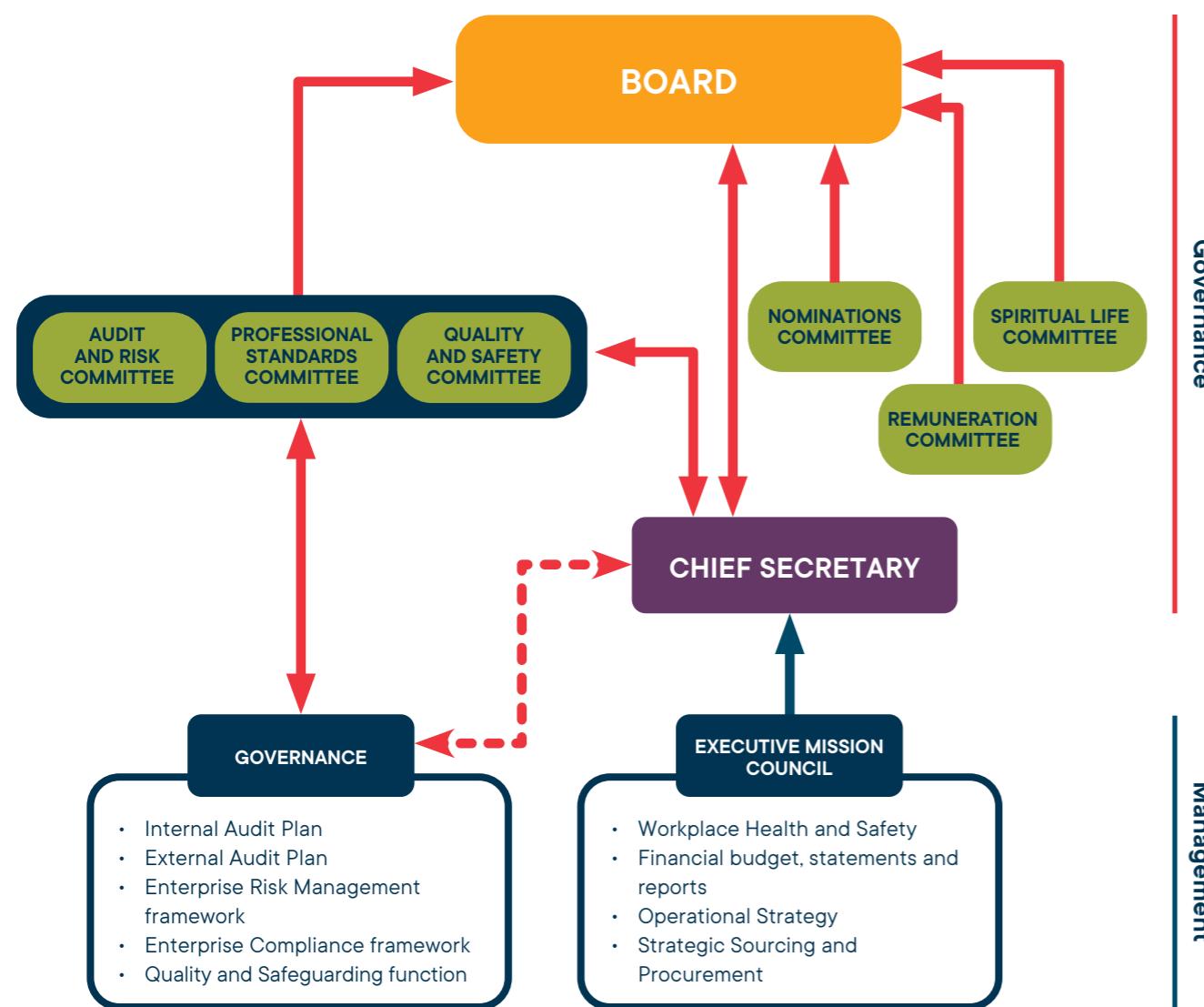
Within our supply chains, we have identified several spend categories that represent material risk for us, due to the geographic, socio-economic, cultural and industry context of that category. The below table sets out areas of The Salvation Army Australia's spend categories deemed to pose moderate to high risk. This table remains largely unchanged from our previous statement.

GOODS/SERVICE	SUMMARY	RISK RATING	GOODS/SERVICE	SUMMARY	RISK RATING
 BUILDING MATERIALS	Australian companies commonly source raw building materials from countries considered high risk for modern slavery. Bricks, cement, granite, rubber and timber have been found to be produced by child and forced labour.		 FOOD & BEVERAGES: CATERING	Due to the nature of the necessary work in the production, processing, packaging and transport of food and beverages, there is a high risk of modern slavery associated with food and beverages. This risk is considered higher for products produced outside of Australia.	
 CLOTHING & TEXTILES (TSA UNIFORMS & MERCHANDISE)	Due to the combination of high-risk inputs, such as cotton, and high-risk production and manufacturing processes, such as fast turnarounds, clothing and textiles products represent a particularly high risk for modern slavery.		 FRESH PRODUCE (MEAT, FISH & ANIMAL PRODUCTS)	Due to the nature of the necessary work in the production, processing, packaging and transport of fresh produce, there is a high risk of modern slavery associated with fresh produce. This risk is considered high even for produce wholly produced in Australia.	
 CONSTRUCTION SERVICES	Construction services present base-skilled labour risks, and the use of sub-contracting to reduce labour costs is common. Modern slavery conditions have been found to be present in Australia, however, a strong union presence may provide some deterrence, protection and access to remedies. Consideration should be given to limiting a suppliers' use of sub-contractors in contract terms and ensuring the cost is fair and reasonable for the services. Contracts should require site access if requested to conduct due diligence and respond to worker grievances.		 FURNITURE	Modern slavery risks in furniture manufacturing are often linked to geographic regions. Child Labor or Forced Labor has been linked to Bangladesh, Turkey, Vietnam, Malaysia and China. Illegal logging is of considerable concern.	
 CONSUMABLES: CLINICAL	Exploitation is known to occur in the production of medical goods. Products with particularly high risk include rubber gloves, surgical instruments, garments, masks, and medical electronics.		 IT HARDWARE (ELECTRONICS)	Due to the combination of high-risk component parts, such as precious minerals, and high risk production and manufacturing processes, IT hardware is a particularly high risk for modern slavery. Goods produced with mined materials, such as mobile phones, carry a high risk of modern slavery, particularly where materials are mined within high-risk geographical locations and complex supply chains.	
 COFFEE	Child labour in particular is rife in the coffee industry across South and Central America and Africa. While the industry is known to have high levels of child and forced labour, this category is deemed moderate given the abundance of ethical options available on the market.		 PROPERTY MANAGEMENT SERVICES	Property management services such as cleaning, security and maintenance present base-skilled labour risks, and the use of sub-contracting to reduce labour costs is commonplace. Modern slavery conditions have been found to be present in Australia. Breaches of basic employment rights, including wage theft, are extremely common. Consideration should be given to limiting a supplier's use of sub-contractors in contract terms and ensuring the cost is fair and reasonable for the services. Contracts should require site access if requested to conduct direct due diligence and respond to worker grievances. Direct employment of staff is preferred.	
 TEA	Child and/or forced labour has been identified in Myanmar, Kenya, Malawi, Rwanda, Tanzania, Uganda and Vietnam. While the industry is known to have high levels of child and forced labour, this category is deemed moderate given the abundance of more ethical options available on the market.		 UTILITIES/ SOLAR PANELS	Utilities sourced within Australia are generally considered low risk, with modern slavery risk exposures often being related to the utility providers' own corporate services. However, solar panels carry significantly high risk. Almost the entire global solar panel industry is implicated in the use of forced labour. Of particular concern is the use of Uyghur workers in the first stages of production, including to crush quartz rocks and working in the coal-fuelled furnaces for the production of polysilicon, as well as further along the supply chain. Suppliers should demonstrate industry and government engagement to address uncontrolled risk, including developing alternative supply opportunities and building onshore manufacturing capability.	
 FLEET & AUTOMOTIVE	Modern slavery-related risks include labour rights abuses, specifically no freedom of association/union rights, living wage and forced labour. Raw material sourcing in conflict zones (where child labour and sexual servitude are common) is also a major issue. Suppliers should provide detail for how they manage these risks, including options for alternative supply outside conflict zones. Sourcing of fabric used for car seats; mining of metals for body should also be interrogated.				

# Oversight of Modern Slavery

## Governance Framework

The Salvation Army Australia has a robust governance framework, with oversight by the Board and direct monitoring of activities and decisions through its committees. The below diagram outlines The Salvation Army Australia's governance structure.



## Governance Policies

Underpinning the governance framework are several policies, and, in particular, the following in relation to modern slavery, which cover and address a broad range of fundamental principles, which guide the delivery of The Salvation Army's mission, with a focus on ethical and lawful behaviour.

The following procedures and standards have been implemented to strengthen the application of the Procurement Policy:

### PROCUREMENT POLICY

The Salvation Army Australia's Procurement Policy outlines the principles and identifies the standards that apply to procurement and the purchase of goods and services. It outlines due diligence in the procurement process, which must be proportionate to the level of expenditure and associated risk. Further, the policy highlights the possibility that purchased goods and services may be the result of Modern Slavery and that this must be considered by all parts of The Salvation Army Australia that engage in procurement of goods and services.

### CONTINGENT LABOUR STANDARD

Provides guidance on the use of contingent workers by The Salvation Army Australia, including procurement of contingent workers, engagement of contingent labour (Professional Services / Independent Contractors / Labour Hire / Sole Traders), and management of contingent workers.

### SUPPLIER CODE OF CONDUCT

Establishes The Salvation Army Australia's expectations of suppliers and their supply chain when they are providing goods and services to The Salvation Army Australia.

### SOURCING AND AGREEMENT STANDARD

Provides guidance to The Salvation Army Australia's personnel on the sourcing of goods and services on using quotes and tenders, creation of preferred supplier arrangements, including supplier risk assessments, and procurement agreements.

### PURCHASING STANDARD

Provides guidance to The Salvation Army Australia's personnel in the purchase of goods and services, use of purchasing arrangements/agreements, specified purchasing methods, and supplier selection.

The following policies are also in place as part of The Salvation Army Australia's governance framework:

- Approved Authorities Policy
- Code of Conduct Policy
- Compliance Policy
- Feedback and Complaints Policy
- Governance Policy
- Incident Management Policy
- Investment Management Policy
- Risk Management Policy
- Safety and Wellbeing of Children and Young People Policy
- Whistleblower Protections Policy

# What we are doing to manage Modern Slavery risks in our supply chain

As reported in our previous modern slavery statement, The Salvation Army Australia has developed a comprehensive program for addressing modern slavery based on three key pillars:

1. Supply chain governance
2. Stakeholder engagement
3. Internal capacity building

This work continues to be led by a dedicated Responsible Sourcing Manager within the Strategic Sourcing and Procurement function, whose responsibilities include embedding responsible sourcing across the organisation, conducting extensive proprietary research on procurements and suppliers to inform risk assessment and action; and supporting key stakeholders to better understand and respond to modern slavery in supply chains. Oversight of better indigenous supplier engagement has also been added to the role responsibilities to better align the broader assessment and engagement of suppliers through the one role.

In 2025, The Salvation Army Australia took significant steps across these pillars to enhance our approach to identifying and mitigating risks of modern slavery in our supply chains.

## Key actions and initiatives

### Procurement Policy Revision:

The Salvation Army Australia updated its Procurement Policy to better align with international standards and clarify terminology related to modern slavery and responsible sourcing.

**Responsible Sourcing Capacity Building:** During this reporting period, we directly engaged both the IT & Property teams to train and educate them about our Responsible Sourcing Toolkit, ensuring they embedded modern slavery considerations in their decision-making when selecting suppliers. Other updates included:

- Allocation of resources on high-risk sourcing categories with direct and detailed review of supplier options prior to supplier engagement in sourcing activity
- Continued development and refinement of our comprehensive screening questions and grading rubric for more consistent vetting of current and new suppliers

### Embedding Responsible Sourcing:

Working to embed and strengthen responsible sourcing across our organisation, Procurement incorporated the toolkit methodology in two key projects—one involving branded merchandise, which The Salvation Army sourced in a completely decentralised way across the organisation (see Case Study below); and a second in a due diligence exercise vetting partners for provision of cashless payments solutions across The Salvation Army Australia (see case study).

Through this work, we worked collaboratively with representatives from across our organisation to make strategic decisions that balanced cost considerations with modern slavery risks. Fulfilling our commitment to take an engagement-over-compliance approach, we engaged a supplier who did not immediately meet our expected standard given they are based offshore (Singapore) but have demonstrated values alignment and interest in upskilling their understanding of and exposure to modern slavery considerations as they develop their organisational capability. This supplier later told us that the work they had to do with The Salvation Army Australia contract was more rigorous than they had encountered before and have appreciated the opportunity to work collaboratively and believe this interaction will allow them to more competitively bid for future work in Australia.

## CASE STUDY: STRATEGIC PARTNERSHIP WITH WINC AND ZINC FOR ETHICAL SOURCING

**The Salvation Army Australia is deeply committed to upholding human and labor rights throughout our supply chains. This case study highlights our recent decision to partner with both Winc and Zinc to source our branded merchandise, demonstrating how we're making strategic choices to work with suppliers who share our values and commitment to ethical practices; and because this decision involved a team of people from across The Salvation Army and consolidated a particularly decentralised spend, it is also a great example of how we are embedding responsible sourcing across our business.**

As part of our ongoing efforts to ensure fair, decent, and dignified working conditions in our supply chains, we conducted a thorough assessment of potential suppliers for our branded merchandise needs. Winc and Zinc stood out for their alignment with our values, commitment to transparency and their robust approach to supply chain management.

### Key Factors in Supplier Selection

#### 1. Shared Values and Commitment to Responsible Sourcing

Winc and Zinc demonstrated a strong commitment to ethical practices. They have:

- Direct relationships with manufacturers, avoiding reliance on brokers
- Offer of quarterly sustainability meetings with clients

#### 2. Supply Chain Transparency

Winc and Zinc in particular excelled in providing the requested supply chain information, including:

- Disclosure of requested supply chain information
- Vertical integration and direct management of parts of Tier 3 for greater oversight

Our partnership with Winc and Zinc highlights our commitment to making strategic decisions that uphold human and labor rights in our supply chains. Essentially, we believe that by partnering with suppliers like Winc and Zinc, we will enhance visibility into our merchandise supply chain; improve our ability to verify fair working conditions; and address issues in a sustainable and worker-centered way when they occur.

## Annual Supplier Forum:

The Salvation Army hosted our third annual Supplier Forum, bringing together 52 of our most strategic suppliers, representing over \$100 million in spend, as well as hosting nearly 30 representatives from across The Salvation Army Australia to provide them the opportunity to engage and further educate themselves about modern slavery considerations in our supply chains.

We also hosted procurement representatives of The Salvation Army New Zealand to support the potential collaboration with The New Zealand, Fiji, Tonga and Samoa Territory in sourcing products for The

Salvation Army across both territories. At this forum, we collaborated with several key suppliers to share information about The Salvation Army Australia's approach to environmental sustainability and circular economy; modern slavery and meeting the social responsibility challenges of the future. We also had the Head of Policy from the Antislavery Commissioner's Office provide an oversight of her newly formed role and the focus of her initial engagement. In addition to this we had representatives from the Australian Uyghur Tangritagh Women's Association and Poonam Datar, a Worker Rights Leader, present on their views of a centred worker approach to supply chains and had the Issara Institute introduce our suppliers to three ways of going beyond audits to improve supply chain assurance.



## Shift toward Worker-Led Supply Chain Assurance

The Salvation Army decided to continue to invest in a partnership with the Issara Institute, a pioneering non-governmental organisation tackling human trafficking and forced labour issues in global supply chains. This partnership marks the beginning of a transition away from a top-down, buyer-led approach to supply chain assurance to a more human-centered, worker-led approach.

### From Audits to Partnership: The Salvation Army and Issara Institute

Modern slavery cannot be addressed if it never comes to light and because there are so many barriers to identifying the practice (i.e. fear and mistrust of authorities), detection often relies on workers coming forward. This requires trust and trust is only built when workers see that the system meant to help them actually works.

Despite good intentions, traditional corporate social responsibility (CSR) approaches are not working to achieve this trust. A growing evidence base<sup>1</sup> indicates that social audits are failing to detect serious rights violations and are often entirely disconnected from grievance mechanisms and remediation pathways, if they exist. This system is not just failing workers. It is also failing businesses, including buyers and their suppliers, who are pouring millions of dollars into ineffective strategies that are now being challenged in the courts<sup>2</sup> and are unlikely to stand the test of stricter legal requirements, such as Europe's Corporate Social Due Diligence Directive (CSDDD).

Reflecting on our progress to date, we found that the traditional approach of derisking at Tier 1, attempting to cascade standards up the supply chain and auditing for verification had plateaued. Many of our suppliers simply don't have the resourcing or information to reliably verify labour standards to the point of origin. Recognising this, we built a successful business case for a strategic shift away from traditional, buyer-driven corporate social responsibility to a more inclusive approach that provides workers an active voice in supply chain governance and has been proven to effectively detect and remediate rights abuses.

We will be doing this through our strategic partnership with the Issara Institute. Established in 2014, Issara Institute is an independent non-governmental organisation (NGO) based in Asia and the U.S. tackling issues of human trafficking and forced labour through worker voice, partnership, and innovation. The Institute was founded by a team of anti-trafficking expert practitioners who, understanding the barriers workers experience in reporting rights violations and accessing remedy, created an alliance of private sector, civil society, and government partners to address labour issues in global supply chains.

Operating at the most grassroots level, Issara have pioneered "Inclusive Labour Monitoring" (ILM) – a worker-informed technology system and multi-stakeholder collaboration platform equipping global brands, retailers, suppliers, recruitment agencies, and government with the tools to drive more ethical supply chains and engage meaningfully with workers and civil society.

ILM has opened a diverse set of communication channels for workers to voice concerns, as well as praise, for employers in a way and timeframe that suits workers. This means more workers are coming forward and more issues are getting addressed promptly and effectively<sup>3</sup>—and often before they become more serious problems. ILM provides an evidence-based addition, if not alternative, to traditional CSR that is both proven and affordable. In fact, we believe it is likely to deliver far better value and brand protection than audits.

Over time, we envision a transition away from screening poor players out of our supply chain to screening in players we know are already doing the right thing, as validated by workers. In line with trying to help Issara we have agreed to share our supply chain and in the next 12 mths expect to target and engage key partners in accessing and engaging Issara to interact with their employee and contract networks to further expand the reach of Issara across base worker communities.

The Salvation Army Australia is the first not-for-profit Partner of Issara and the first Partner who is also a local service provider who may support remediation efforts through the ILM Action Network.

<sup>1</sup>See generally, Moore, H. & Kishna, S. Eds. (April 2024). Access to remedy for survivors of all forms of slavery, trafficking and forced labour [Special Issue] Journal of Modern Slavery. [https://slavetreetoday.org/journal\\_of\\_modern\\_slavery/v9i1-access-to-remedy-for-survivors-of-all-forms-of-slavery-trafficking-and-forced-labour.pdf](https://slavetreetoday.org/journal_of_modern_slavery/v9i1-access-to-remedy-for-survivors-of-all-forms-of-slavery-trafficking-and-forced-labour.pdf). See also, Jolyon Ford and Justine Nolan, "Regulating Transparency on Human Rights and Modern Slavery in Corporate Supply Chains: The Discrepancy between Human Rights Due Diligence and the Social Audit," Australian Journal of Human Rights 26 no. 1 (January 2020): 27–45, <https://doi.org/10.1080/1323238X.2020.1761633>; Amy V. Benstead, Lisa C. Hendry and Mark Stevenson, "Detecting and Remediating Modern Slavery in Supply Chains: A Targeted Audit Approach," Production Planning & Control 32, no. 13 (2020): 1136–1157, <https://doi.org/10.1080/09537287.2020.1795290>; Transparent (2020), <https://transparent.org/wp-content/uploads/2021/09/Hidden-Harm-Audit-Deception-in-Apparel-Supply-Chains-and-the-Urgent-Case-for-Reform.pdf>.

<sup>2</sup><https://www.leighday.co.uk/news/news/2022-news/tesco-and-intertek-face-claims-of-forced-labour-and-debt-bondage-at-ff-fashion-factory/>

<sup>3</sup>Inclusive Labor Monitoring Community Dashboard | <https://www.workvoices.org/worker-voice>

# How we are assessing the effectiveness of our management of Modern Slavery risks in our supply chains and operations

As reported previously, The Salvation Army Australia's approach to modern slavery in supply chains is embedded within a broader responsible sourcing program, which is connected into our national vision. We have also adopted a 'theory of change' approach to measuring effectiveness, through which we test our assumptions about the causal pathways between our actions and the change we expect to see as a result. To monitor progress over time, we developed a logic model that contextualises earlier, process-based activities and outputs within longer-term, outcomes-focused objectives.

Over time, we expect that our activities will lead to measurable change in how we engage with key stakeholders within and connected to our supply chains. A key measure of success for us is to identify issues and quite possibly violations. A second measure will inform whether our efforts to remediate these problems has effectively resolved the matter in terms of both addressing the cause and the impacts of the harm. We anticipate that our new partnership with Issara Institute will significantly enhance our ability to meet these two targets.

## NATIONAL VISION STATEMENT

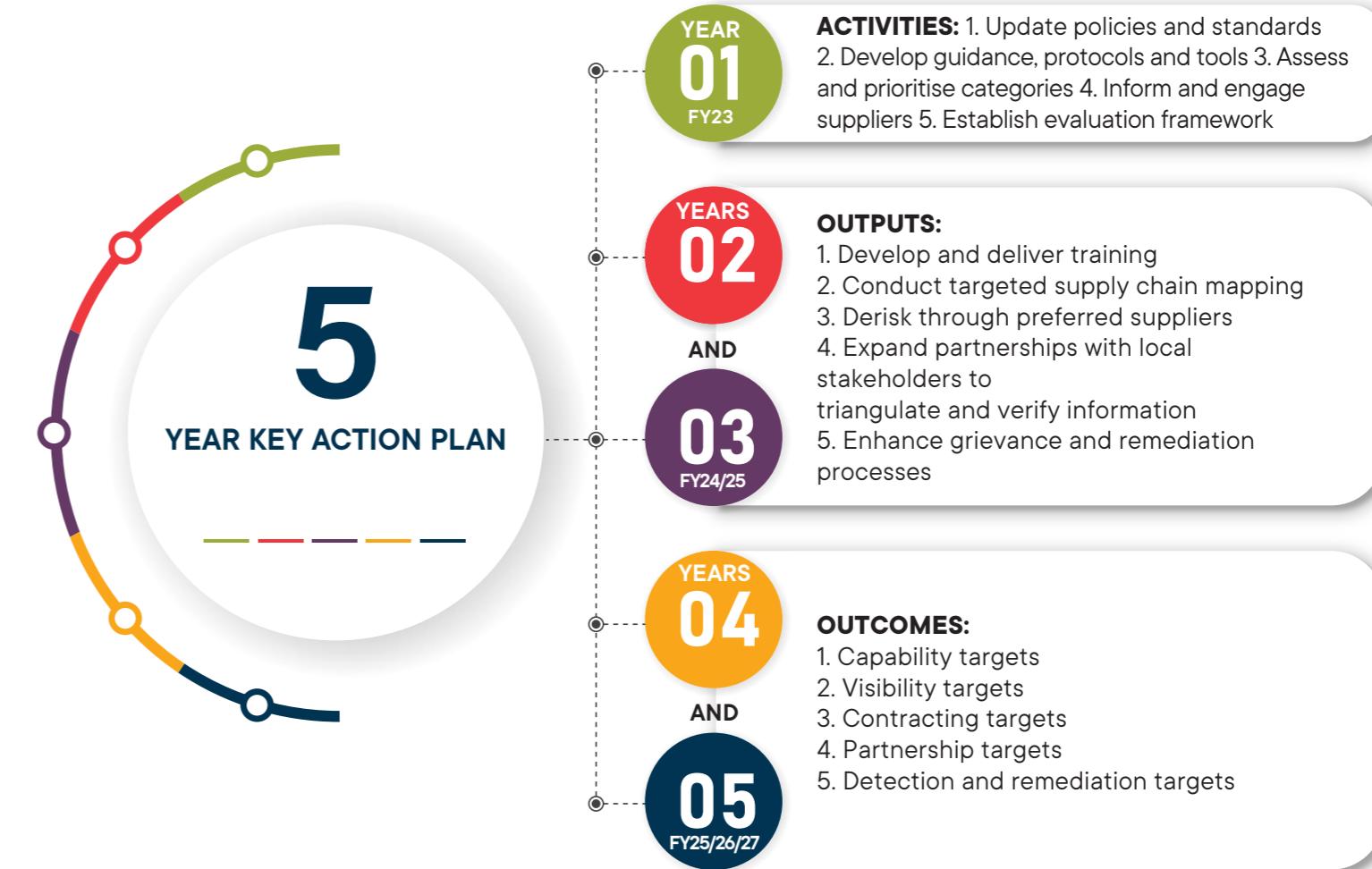
Wherever there is hardship or injustice, Salvos will live, love and fight alongside others to transform Australia one life at a time with the love of Jesus.

## RESPONSIBLE SOURCING PROGRAM VISION

To ensure we are not benefitting from, causing or contributing to hardship or injustice through the goods and services we procure.

## GOAL

To embed responsible sourcing into purchasing and procurement activity across the organisation.



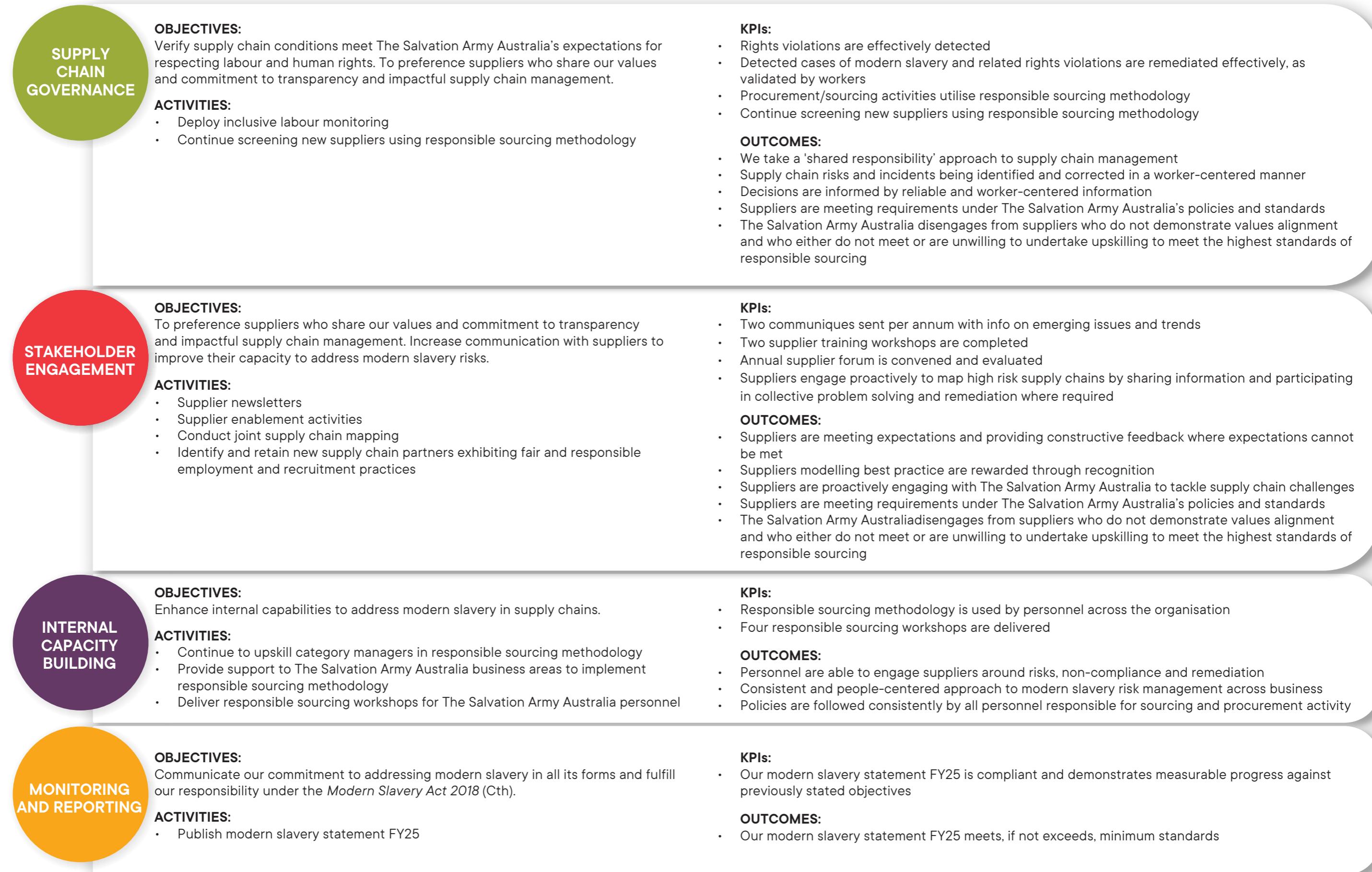
Based on our aims for FY25, we would note we are around 12 months behind where we had planned to be and expect the key activities identified for FY24/25 to continue into FY27.

### Key Accomplishments:

- Continuation of the supplier forum with significant growth in the attendance and interest in the shared education of all participants in modern slavery concepts and understanding.
- We progressed supply chain mapping in high-risk categories, including food, rubber gloves, furniture and apparel/merchandise.
- Derisking through preferred suppliers, including contract cleaning, food services, mattresses, apparel/merchandise and fleet.
- Joined Inclusive Labour Monitoring Action Network to link with local partners in sourcing areas and establish an effective detection and remediation mechanism in the 2026 financial year.

During the year we further refined a more specific evaluation framework with key performance indicators and outcomes for each of our three work pillars: supply chain governance; stakeholder engagement; and internal capacity building (as shown on page 34/35).

# 2025 financial year evaluation framework



# How we are working together to combat Modern Slavery risks in our supply chains and operations

All of the Property Trusts share the same body of Trustees and executive management teams. All of the Property Trusts adopt the same policies, procedures and protocols.

The Companies have Boards of directors appointed with the express approval of the Trustees of the Property Trusts who are the relevant parent entities of each company. Other than with respect to industry specific additional requirements, all of the Companies adopt the same policies, procedures and protocols and operate in similar sectors.

This Joint Modern Slavery Statement was prepared in consultation with The Salvation Army Australia's Enterprise Risk and Compliance, and Strategic Sourcing and Procurement teams. This Joint Modern Slavery Statement was prepared following discussions and involvement of these functions in so far as they operate and the relevant key individuals interact both with the Property Trusts and the Companies. The Salvation Army Australia's Board is committed to the modern slavery initiatives set out in this Joint Modern Slavery Statement.

Throughout the reporting period, updates on our activities to combat Modern Slavery were provided to the Board Audit and Risk Committee for their awareness. This Joint Modern Slavery Statement was provided to the Board for review, prior to it being formally adopted by the Board for sign off by the Board Chair and the Chief Secretary of The Salvation Army Australia.

# What else we are doing to fight Modern Slavery

## Policy and Advocacy

The Salvation Army Australia continues to advocate to influence key decision makers and those who have the power to implement social policy change. This includes advocacy with federal, state and territory members of parliament, noting that social policy can make the most difference to those experiencing hardship, injustice and marginalisation.

Situated within The Salvation Army Australia's Policy, Research and Social Justice Department, the Policy and Advocacy team is responsible for coordinating social policy development, social justice education and advocacy efforts on social policy issues, including modern slavery and human trafficking

## Service, support and outreach

Since 2008, The Salvation Army Australia has continued to independently operate the only refuge in Australia dedicated exclusively for survivors of slavery and trafficking. The Safe House also supports men, women and children in the community who may be at risk of slavery and severe labour exploitation.

The Safe House provides flexible and comprehensive support to survivors including:

- Access to health care
- Access to legal support
- Accommodation
- Confidential advice
- Education/employment assistance
- Emergency financial relief
- International assistance
- Rights education

## Pathways to independence

The Salvation Army Australia also operates the Australian Freedom Fund, which provides small, individual grants to survivors and people at risk of modern slavery.

The Salvation Army Australia also operates Australia's first and only Modern Slavery Transitional Housing Pilot in partnership with Salvos Housing and the Sisters of Charity Foundation, providing survivors with supported pathways to independence.

## Lived Experience Engagement Program (LEEP)

LEEP is a TSA program supported by the Australian Government. The program seeks to support direct contributions and advice to the Australian Government on human trafficking and modern slavery policy and programs from people with lived experience of trafficking, slavery and slavery-like practices, including servitude, forced labour and forced marriage.

In late 2022, the LEEP model was operationalised. In 2024, LEEP expanded to include a Connect and Grow program to support connection, leadership and advocacy development.

Drawing from LEEP participants, a Survivor Advisory Council (SAC) to the government has been established, the first of its kind in Australia and a first step in a partnership approach with modern slavery survivors to achieving change.

In its second iteration, LEEP has increased participant numbers to include people with lived experience of forced marriage and expanded the SAC from six to eight members. Incorporating their diverse experiences, cultures and abilities, members contribute expertise to assist the achievement of National Action Plan action items.

Their work so far this year has included the Victim and Survivor Engagement and Empowerment Strategy; enhancing civil protections and remedies for people in or at risk of forced marriage; and supports for people with lived experience of forced marriage. They have also been consulted about lived experience engagement in the training of police.

LEEP was funded by the Australian Government through Round 1 and 2 of the National Action Plan to Combat Modern Slavery 2020-25 Grant Program.

## Additional Referral Pathway

The Additional Referral Pathway (ARP) is a pilot program aimed at assisting individuals who have experienced or are experiencing modern slavery by helping them understand their rights and connect with appropriate support. Delivered by a consortium led by The Salvation Army Australia and funded by the Commonwealth Department of Social Services (DSS), the ARP includes organizations such as Anti-Slavery Australia, Australian Muslim Women's Centre for Human Rights, Project Respect, and Scarlet Alliance.

The program offers a safe, confidential, and culturally sensitive entry point to the Support for Trafficked Persons Program (STPP), with a trauma-informed approach. It involves screening and assessing individuals for indicators of modern slavery, while also focusing on enhancing their safety and well-being through safety planning and addressing immediate welfare needs, such as emergency accommodation, transport, and food. Legal advice will be provided, and alternative support options will be identified for those deemed ineligible for the STPP.



Each of the bodies / entities defined in this document as comprising The Salvation Army Australia, are all owned and controlled by the Trustees, who, by virtue of a resolution of the Trustees, consider the Board to be the relevant higher entity as per section 14(2)(d)(ii) of the *Modern Slavery Act 2018* (Cth). This Modern Slavery Statement was considered and approved by the Board of The Salvation Army Australia on 4 December 2025.

A handwritten signature in black ink, appearing to read "M. Gluyas."

Miriam Gluyas, Commissioner  
Territorial Commander, Chair of the Board,  
The Salvation Army Australia

A handwritten signature in black ink, appearing to read "W. Merrett".

Winsome Merrett, Colonel  
Chief Secretary  
The Salvation Army Australia

## **Modern Slavery Statement Australia 2025**



---

**The Salvation Army  
Australia**  
**[salvationarmy.org.au](http://salvationarmy.org.au)**  
**13 SALVOS (13 72 58)**