



Modern Slavery Statement

2020 Australia





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
- Compassion
- Respect
- Diversity
- Collaboration

We commit ourselves in prayer and practice to this land of Australia and its people, seeking reconciliation, unity and equity.

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Message from the

*Territorial
Commander*

The Salvation Army, as both a church and a charity, has a long history in speaking about justice, compassion and other issues that support the welfare of others. Through direct services, raising awareness, education and community we are responding to modern slavery in Australia. As one of the largest providers of social services and programs for people experiencing hardship, injustice and social exclusion, we recognise our responsibility for ensuring modern slavery does not take place in our operations and supply chains. We value and respect the human rights of all those we engage with including our officers, employees, volunteers, contractors, suppliers and community members and recognise that those we serve are often disproportionately affected by modern slavery.

The goal of our first modern slavery statement is to share our collective actions in addressing modern slavery risks during the FY2019/20 reporting year. We express our ongoing commitment to the journey that will continue to build effective systems of control to ensure modern slavery does not occur within our supply chains.

God bless you,

Robert W. Donaldson (Commissioner)

BSc LTh PGDipBusAdmin MInstD(NZ)

Territorial Commander and

Chair of the Board

Australia Territory



Message from the

*Chief
Secretary*

The development of this first modern slavery statement is a significant and essential step for The Salvation Army Australia Territory to articulate our vision of seeing lives transformed through the love of Jesus. This statement recognises that our journey to know and address our modern slavery risks is ongoing and represents a living document for our continued initiatives. The past financial year has been incredibly tough with drought, bushfires and a global pandemic. We have seen this result in increased vulnerability but also a newfound ability to quickly, creatively and collaboratively adapt which we will strive to apply in our modern slavery initiatives.

The Salvation Army is committed to ensuring our people and those we serve, the processes we use and the environments in which our people work and minister are safe.

God bless you,

Winsome Merrett (Colonel)

B.Sp.Thy., MA Arts (Theological studies) A.Mus.A

Chief Secretary

Australia Territory

Who we are s.16(1)(a)

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 2019 to 30 June 2020:

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
 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 appointed 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 companies limited by guarantee are 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. 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.

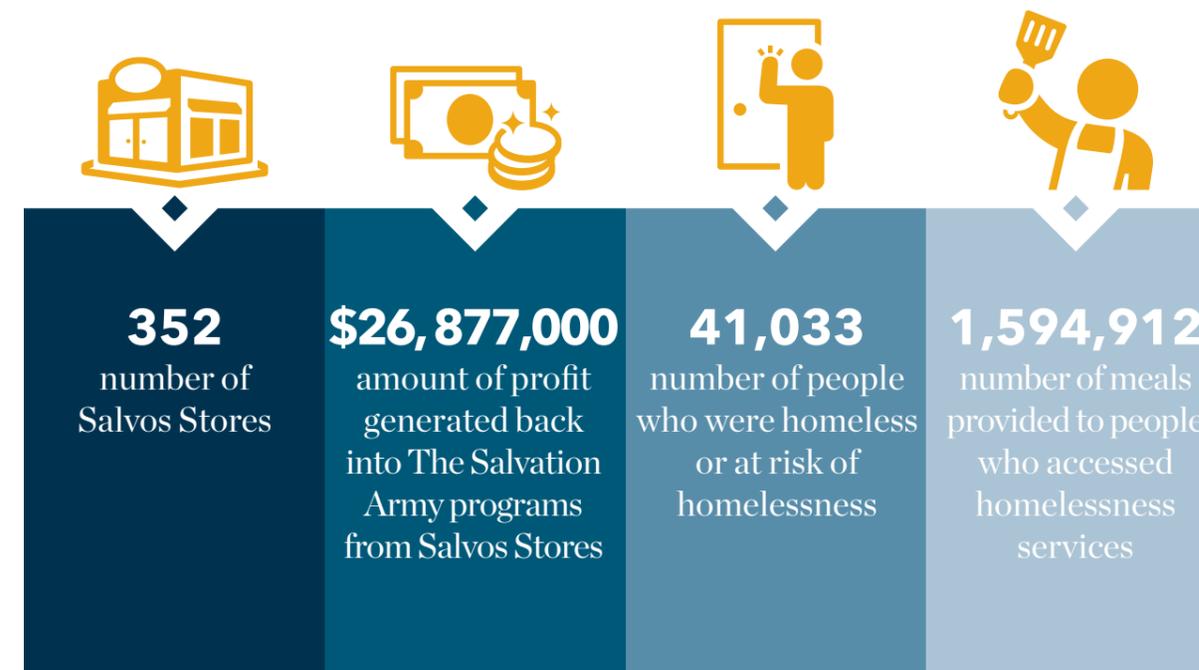
In 2019, The Salvation Army Australia established a body known as The Salvation Army Australia Territory Board (the 'Board'), which, together with the Trustees is responsible for effectively representing and promoting the interests of The Salvation Army Australia, with a view to adding long term value 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 by the Chair of the Board, who is the General's personal representative in Australia, known as the Territorial Commander.



What we do – our services, operations and supply chains

2019–2020 snapshot of our services ^{s.16(1)(b)}





Our services and activities

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.

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.

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.



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.



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.



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.

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.

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
- No-interest loans





Our services and activities

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.



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.

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.



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 vision – 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.

Fundraising and Financing: The primary goal of The Salvation Army'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's mission. The primary fundraising campaigns annually are the Red Shield Appeal and Christmas campaign. Due to the impacts of COVID-19 in 2020, a majority of community collections were converted to on-line fundraising. The Salvation Army's mission is additionally funded through investment activities. Funds are invested to further the achievement of mission objective and include equity, hybrid and fixed interest instruments.



The Salvation Army Employment Plus: The Salvation Army Employment Plus was established as an agency in 1998 by The Salvation Army to deliver on their 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 vision of 'Work for All. Hope for all.'

Salvos Legal Humanitarian: Salvos Legal Humanitarian provides free legal services to clients across New South Wales. We believe that no one should be without a trusted legal advisor in their time of need. We understand the importance of access to justice, the protection and advancement of human rights, and work towards making systemic change in the community. Our holistic approach connects clients with The Salvation Army's full range of social welfare services to help address the underlying causes of injustice.

Chaplaincy: The Salvation Army chaplains provide counsel and comfort to Australians in need at homelessness services, prisons, family and domestic violence services and to emergency personnel. Our rural chaplains and flying padres are the cornerstones for connection for farmers and small communities in many remote regions. Chaplains provide one-on-one support, financial assistance, attend community events, give gifts at Christmas and conduct weddings and funerals.



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.

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.





Supply chain procurement and operations

As the nature of our work provides services to cities, country towns and rural communities across Australia, the majority of our suppliers are Australian-based.

During the year ended 30 June 2020, we engaged directly with more than

19,000

suppliers within over

40 different spend categories with approximately

55% of spend with the top **50** suppliers.

We have over

3,000

pool and tool-of-trade vehicles for which fleet management services are provided, including lease/rental, fuel, tolls and accident management insurance.

Top spend categories:

- Catering
- Fleet
- Cleaning
- Information Technology



In alignment with its services, The Salvation Army Australia procures goods and services within the following areas:

- Telecommunications
- Cleaning and Laundry
- Printing
- Insurance
- Advertising and Promotion
- Catering
- Travel and Fleet
- Information Technology
- Waste

The four top spend categories make up in excess of:

\$45 million in purchases

90% of our fleet spend is with **1** supplier.

Oversight of modern slavery

Governance

The Salvation Army Australia is committed to delivering its mission in a responsible and ethical manner and does not tolerate modern slavery. The Salvation Army Australia has a robust governance framework, with oversight by the Board and direct monitoring of risk and compliance activities through the Audit and Risk Committee. Underpinning the governance framework are several policies, and, in particular, the following in relation to modern slavery:

- Code of Conduct Policy
- Whistleblower Policy
- Risk Management Policy
- Compliance Policy
- Approved Authorities Policy
- Incident Management Policy
- Feedback and Complaints Policy

These policies 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.

Procurement

The Salvation Army Australia's Procurement Policy outlines the principles and identifies the standards that apply to procurement and purchase of goods and services. Further, it outlines due diligence in the procurement process, which must be proportionate to the expenditure with the supplier and the level and type of associated risk, including with respect to modern slavery.

The Salvation Army Australia also has in place a Supplier Code of Conduct Standard, which outlines the expectations of suppliers and their supply chain when providing goods and services to The Salvation Army, including with respect to modern slavery

Advocacy

The Salvation Army Australia's Policy and Advocacy function is responsible for The Salvation Army's broader human rights programs, including addressing human trafficking and modern slavery issues. Accountability for addressing modern slavery and human rights risks and issues is cross-functional throughout the movement. Our functional departments work together to embed The Salvation Army's principles in relation to this complex global issue.

Australian Charities and Not-for-Profits Commission

The Salvation Army Australia is registered with the Australian Charities and Not-for-profits Commission (the Commission), the national regulator of charities, established to maintain, protect and enhance public trust and confidence in the Australian not-for-profit sector.

The Salvation Army respects and adheres to the governance standards as set by the Commission, which include the requirement to comply with Australian laws.





Identification of modern slavery risks in our operations and supply chains ^{s.16(1)(c)}

As part of its Governance framework, The Salvation Army Australia's Enterprise Risk and Compliance function actively monitors modern slavery risks throughout its operations and supply chain, and, in particular, assesses the overall links to and understanding of modern slavery.

The enterprise risk and compliance frameworks are considerate of human rights, social expectations and the fact that the most severe modern slavery risks don't always necessarily align to the most economical supply decisions. The Salvation Army Australia may be linked to modern slavery practices within downstream third-party supply chain activities in Australia or internationally.

Key elements of the supply chain have been mapped to appropriately understand and provide visibility of its inner workings, key dependencies, and potential exposures. As part of initial risk mapping exercises and having regard to the identification of inherent risks within our operations and supply chain, The Salvation Army Australia recognises that there are risks of modern slavery within the following areas:

- **Cleaning and laundry**
- **Uniforms and other textiles**
- **Agency labour hire**
- **Catering and hospitality**
- **Aged Care medical supplies**
- **Information Technology hardware**
- **Construction**

Specifically, the following key modern slavery risk focus areas have been identified:

- **Worker vulnerability and labour exploitation, across all parts of the supply chain;**

- **Outsourcing & sub-contracting, noting that at times there is limited visibility of contractual arrangements at all levels;**
- **Forced labour, in association with deceptive contracting, identity management and service fees;**
- **Engagement of people overseas, for example, via our international development partnerships;**
- **Child labour, particularly in the preparation of raw materials as part of the broader supply chain; and**
- **Financing and property activities, inadvertently via the development of properties, all in support of what we do.**

Further, as a large movement, The Salvation Army Australia is mindful of the ability it has to influence change through its lending and investments. The Salvation Army Australia is committed to ethical lending and investments and works with its suppliers to manage modern slavery risks. As part of its commitment to modern slavery initiatives, and as part of the next reporting period, The Salvation Army Australia will map the impact of its lending and investments, particularly with a view to ensuring it fully understands and appropriately manages the risks in its financial portfolio to avoid causing, contributing to, or becoming directly linked to modern slavery.

Over the next reporting period these risks will be examined with more precision and to determine the strategy to be adopted for continuous improvement in assessing and addressing

the risks, consistently with the United Nations' Guiding Principles on Business and Human Rights, so as to gain a deeper appreciation of how the movement can cause, contribute to, or become directly linked to modern slavery and in becoming more aware, actively work on improved initiatives to ensure practices do not perpetuate modern slavery in operations and supply chains.

In support of risk management work, the following initiatives are in place:

Supplier Risk Analysis

The Salvation Army Australia has designed and introduced a supplier risk analysis tool which utilised a risk-based approach to supplier selection. The tool is structured to assess purchases and spend by category/type, and in particular, focus on the complexity of a supplier's supply chain, as well as the inherent degree of modern slavery risk. Each supplier is assigned a risk rating on this basis. As at 30 June 2020, the Strategic Sourcing and Procurement function has applied the supplier risk analysis tool across approximately 60 spend categories and 14,000 suppliers.

Advocacy

The Salvation Army Australia's Policy, Research and Social Justice function is active in developing social policy positions to address modern slavery risks in Australia and then working collaboratively with government to address those risks. The Salvation Army Australia also plays a role in educating our Corps and the communities we serve around issues to do with modern slavery and worker exploitation. A modern slavery discussion group consisting of The Salvation Army Australia's Enterprise Risk and Compliance, Strategic Sourcing and Procurement, and Policy and Advocacy teams is in place in support of this work and meets regularly.

Training and Awareness

The Salvation Army Australia's modern slavery training is aligned to its Code of Conduct, which defines the expected standards of behaviour and conduct required of all personnel. Specifically, the Code of Conduct training program addresses principles and expectations with respect to acceptable behaviours, The values of The Salvation Army, and the responsibilities to the community around human rights. To date, more than 86 per cent of Salvation Army personnel have completed the Code of Conduct training program, with efforts continuing to reach the targeted 100% compliance. Completion of training is monitored on a routine basis, and personnel who fail to complete mandatory compliance training are subjected to disciplinary action. The Salvation Army Australia will soon introduce a dedicated Modern Slavery Training and Education Program for key staff and suppliers. The purpose of the training is to ensure various stakeholders understand what modern slavery is, what our risks are, and our expectations for managing risks and incidents effectively.



What we are doing to *manage* modern slavery risks in our *supply chains* s.16(1)(d)

Supply Chain and Procurement Governance

During 2019, The Salvation Army Australia underwent a major transformation to bring multiple regions into one Australian territory, with key administrative functions centralised and prioritised for improved governance, effectiveness, efficiency and management of risk.

At this point the national Strategic Sourcing and Procurement function was formed to facilitate the procurement of goods and services that best enable the delivery of The Salvation Army's mission and vision.

A key focus of the function has been to reduce supply risk through objective and transparent supplier selection and management.

The Salvation Army Australia's sourcing and procurement activities and decisions are considerate of:

- **labour practices (including risks of modern slavery)**
- **environmental impacts**
- **health and safety**
- **ethical considerations**

Risks are assessed and addressed during the selection and appointment of suppliers, all of which undergo a formal vetting and due diligence process. Suppliers are required to acknowledge and agree to The Salvation Army's contractual terms, which validate the alignment of their standards to our Supplier Code of Conduct Standard and include modern slavery compliance clauses.

Further, it is expected that suppliers monitor their own suppliers' compliance with the Supplier Code of Conduct Standard, to correct any breaches or concerns, and to notify in a timely manner.

Adherence to such standards is monitored, noting where suppliers have adopted their own processes for managing associated risks.

Where concerns or issues are identified, The Salvation Army Australia adopts and respects the United Nation's Guiding Principles on Business and Human Rights, which require cause of or contribution to adverse impacts on modern slavery to be remediated. As such, in these cases, remediation is sought as a priority, and will take many forms, including implementation of preventative steps to avoid re-occurrence, formal warnings and apologies. As a last resort, and where remediation is not undertaken, cessation of supply is enforced to mitigate modern slavery risk.



How we are *assessing* the effectiveness of our *management* of modern slavery risks in our *operations* and *supply chains* s.16(1)(e)

The Salvation Army Australia acknowledges that various initiatives are in progress to determine a global standard in relation to human rights and measurement of impact.

The following mechanisms are available to monitor the effectiveness of The Salvation Army's modern slavery risk mitigation actions:

Enterprise Risk and Compliance Function

The Salvation Army Australia's Enterprise Risk and Compliance function actively monitors modern slavery risks, with formal protocols embedded to ensure risk concerns are appropriately escalated in a timely manner.

Supplier Due Diligence

A Supplier Prequalification and Assessment framework has been developed and will be implemented by 30 June 2021. This will be utilised to assess both new and existing suppliers including the identification of modern slavery risks.

Suppliers will be initially assessed on ethics, labour and sustainability. Suppliers who are deemed to be medium to high risk will be subject to a further questionnaire where they will be required to provide information on current operations, supply chain, suppliers, sub-contractors, labour, environmental, anti-bribery and corruption, health and safety, and a specific focus on compliance with modern slavery legislation.

High-risk suppliers will be subjected to an independent financial background report.

A formalised process is also in place for the management and oversight of independent contractors engaged by The Salvation Army Australia.

It is acknowledged that at times, localised procurement decisions are made in order to best support the immediate needs of The Salvation Army.

The Strategic Sourcing and Procurement function is

actively working with operational functions within The Salvation Army Australia to appropriately influence such decisions to ensure they are considerate of Modern Slavery risks.

Internal Audit

The Salvation Army Australia's Internal Audit program provides independent assurance that risk management, governance and internal control processes are operating effectively.

The Internal Audit program is reviewed on a regular basis in line with risk concerns and exposures, including those in relation to supply chain and modern slavery. This provides a mechanism to track the effectiveness of modern slavery risk-management initiatives.

Metrics

The Salvation Army Australia's focus for this reporting period was on understanding and adapting broad mechanisms for the management and monitoring of modern slavery risks.

Throughout the year ending 30 June 2021, the following measures, which are aligned to our governance model, will be rolled out to ensure a positive approach and impact to addressing (and assessing the effectiveness of) modern slavery, risks:

- **Number / Percentage of supply contracts renewed with modern slavery clauses**
- **Number / Percentage of supplier risk questionnaires completed**
- **Number of internal audit findings (with respect to Modern Slavery and supply chain) opened and closed**
- **Number of supplier incidents and remediation activities opened and closed**
- **Number of supply chain complaints raised and resolved**
- **Modern Slavery training and awareness uptake and completion rates**



How we are *working together* to combat modern slavery risks in our *operations and supply chains* ^{s.16(1)(f)}

Our consultation process

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, operate in the same sectors and, save for minor exceptions, share the same suppliers.

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, operate in the same sectors and, save for minor exceptions, share the same suppliers as the Property Trusts.

This Joint Modern Slavery Statement was prepared in consultation with The Salvation Army Australia's Enterprise Risk and Compliance, Strategic Sourcing and Procurement, and Policy and Advocacy Teams,

together with in-house legal, as well as modern slavery specialist external legal counsel. 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 of our Modern Slavery discussion group were provided to the Board Audit and Risk Committee for their awareness. This Joint Modern Slavery Statement was provided to the Board in draft, for further consideration and comment, 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 ^{s.16(1)(g)}

The Salvation Army Australia's Anti-Slavery programs work to mobilise community, business and government to recognise and respond to modern slavery, including forced marriage in Australia. The Salvation Army Australia works at multiple levels to assist survivors recover and rebuild after slavery, and to empower communities to recognise and respond effectively to instances of modern slavery, with the ultimate purpose of reducing and preventing slavery from occurring within Australia. In addition to direct services, The Salvation Army Australia also raises awareness, provides education and training and works in partnership with the community to ensure that people who have experienced slavery are adequately protected, and, that slavery can be eradicated in Australia.

Service, Support and Outreach

Since 2008, The Salvation Army Australia has independently operated 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.

Slavery-free Communities

The Salvation Army Australia has led efforts to build local capacity to identify and respond to potential cases of slavery, trafficking and labour exploitation. The Salvation Army Australia works closely with governments, communities and other faith groups to support temporary migrants, who are at a higher risk of labour exploitation. This assistance was expanded since the onset of

the COVID-19 pandemic to provide emergency relief, food and pastoral support to workers and students across the country.

Policy and Advocacy

Since 2008, The Salvation Army Australia has been at the forefront of advocacy efforts to improve pathways out of exploitation and services for survivors. We are a founding member of the Australian Government's National Roundtable on Trafficking and Slavery and have been active on several sub-committees.

Our Uniqueness

The Salvation Army Australia established the Freedom Advocates—the country's only survivor advocacy and peer mentoring program for those who have experienced slavery/trafficking.

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

Further, The Salvation Army Australia has launched Australia's first Modern Slavery Transitional Housing Pilot in partnership with Salvos Housing and the Sisters of Charity Foundation.





Notes

Throughout the document reference is made to the following mandatory criteria:

Modern Slavery Act 2018 (Cth) s.16(1)(a)

Modern Slavery Act 2018 (Cth) s.16(1)(b)

Modern Slavery Act 2018 (Cth) s.16(1)(c)

Modern Slavery Act 2018 (Cth) s.16(1)(d)

Modern Slavery Act 2018 (Cth) s.16(1)(e)

Modern Slavery Act 2018 (Cth) s.16(1)(f)

Modern Slavery Act 2018 (Cth) s.16(1)(g)

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 25 March 2021.

Handwritten signature of Robert Donaldson in black ink.

Robert Donaldson, Commissioner
Territorial Commander and Board Chair
The Salvation Army Australia

Handwritten signature of Winsome Merrett in black ink.

Winsome Merrett, Colonel
Chief Secretary
The Salvation Army Australia

