

Modern Slavery Statement

1 January 2025 – 31 December 2025



**Catholic
Cemeteries +
Crematoria**



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Disclosure Note

This statement has been made on behalf of Catholic Cemeteries & Crematoria Limited as Trustee of the Catholic Cemeteries & Crematoria Trust trading as Catholic Cemeteries + Crematoria. This Statement covers all entities owned or controlled by Catholic Cemeteries & Crematoria Limited.

Head Office:

Catholic Cemeteries + Crematoria
Level 2, 11 Murray Rose Ave
Sydney Olympic Park NSW 2127

Website: www.catholiccemeteries.com.au
Contact for Modern Slavery: Mina Neary
Email: minan@catholiccemeteries.com.au

Leadership Message, Approval and Signature

At Catholic Cemeteries + Crematoria (CCC), our mission is grounded in the belief that every person is created with inherent dignity and worth, reflecting the image of God. This conviction shapes how we serve families, how we steward sacred places of remembrance, and how we conduct ourselves as an organisation entrusted with care, compassion, and integrity. Our values of faith, respect, collaboration, and ethical responsibility continue to guide our commitment to protecting the vulnerable and promoting human dignity in all aspects of our work.

Modern slavery remains a pervasive global challenge, and organisations like ours have a responsibility to ensure that our operations and supply chains do not contribute to exploitation. CCC has chosen to voluntarily comply with the Modern Slavery Act 2018 (Cth), recognising that ethical leadership and strong governance extend beyond minimum legal thresholds. We are proud to submit our sixth Modern Slavery Statement through the Australian Catholic Antislavery Network (ACAN) Compendium of Modern Slavery Statements.

Over the past year, CCC has continued to strengthen its approach to identifying, assessing, and addressing modern slavery risks. Our work has included more targeted, risk informed engagement with suppliers, the integration of modern slavery considerations into enhanced procurement practices, and ongoing participation in ACAN initiatives that support continuous improvement. These efforts reflect our commitment to responsible governance and our desire to contribute to a broader culture of ethical practice across the Catholic sector.

We remain dedicated to working collaboratively with our Board, staff, suppliers, ACAN, and the communities we serve. Through these partnerships, we aim to build resilience, increase transparency, and uphold the values that define our organisation. Our focus is not only on compliance but on fostering the awareness, accountability, and capability necessary to identify risks early and respond effectively, so that respect for human dignity is embedded in every decision we make.



A handwritten signature in black ink, appearing to read 'L Hardgrove'.

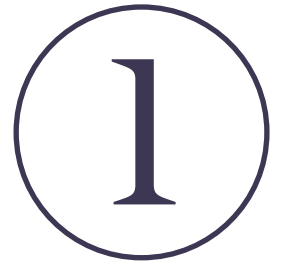
Lauren Hardgrove
Chief Executive Officer



A handwritten signature in black ink, appearing to read 'D Casey'.

Danny Casey
Chair

Criteria 1: About Us



This statement relates to the Catholic Cemeteries & Crematoria Trust (ABN 54 281 755 117), operating as Catholic Cemeteries + Crematoria (CCC). The Trust was established under the Catholic Cemeteries and Crematoria Trust Act 2024 (NSW).

CCC is committed to providing dignified funeral services and perpetual care of resting places. We recognise cemeteries as sacred spaces that honour memory, faith, and community. Our role extends beyond the funeral service to the long term stewardship of these places of remembrance.

Although CCC's turnover remains below the \$100 million threshold for mandatory reporting under the Modern Slavery Act 2018 (Cth), the Board has chosen to maintain a proactive anti slavery risk management program. This includes strengthened procurement practices, supplier engagement, and ongoing education to build awareness and capability across the organisation.

This Modern Slavery Statement is approved by the principal governing body, Catholic Cemeteries & Crematoria Limited as Trustee of the Catholic Cemeteries & Crematoria Trust, as defined by the Modern Slavery Act 2018 (Cth), on 19th of June, 2026.

This Modern Slavery Statement is signed by a responsible member of Catholic Cemeteries + Crematoria as defined by the Act.

Vision + Mission

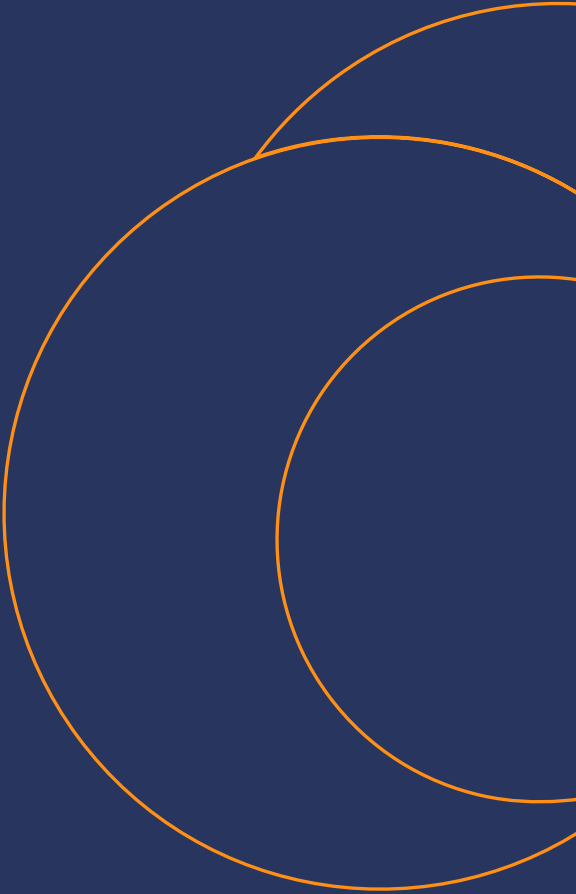
CCC's vision and mission together provide a clear and enduring foundation for our direction as an organisation. They articulate why we exist, what we aspire to achieve, and how we serve our communities. These statements act as a constant reference point for decision making, ensuring that our long term goals remain aligned with our core purpose and the values that guide our work.



Our Vision
Honouring every life forever.



Our Mission
Remembering the dead.
Serving the living.



Our Purpose

Our purpose is the heartbeat of our organisation – it is about why we do what we do, the impact we have on people's lives and why we insist on excellence.



We honour every life through our own Catholic rituals, those of other faiths, and those of none.



We will accompany and comfort those who mourn, as we have done for nearly 160 years.



We are living out the Corporal and Spiritual Works of Mercy from Jesus' teachings in the Gospels.

Our Values

Values have shaped CCC's identity since its inception and continue to underpin every aspect of our operations. They influence how we engage with families, how we steward sacred places, and how we approach governance and organisational responsibility. As CCC looks to the future, these values remain central to who we are and how we act. They form the cultural fabric that supports our mission and strengthens our commitment to ethical, compassionate, and community centred service.



Criteria 2: Structure, Operations and Supply Chain

2

Our Organisational Structure

Catholic Cemeteries and Crematoria Trust (CCCT) (ABN 54 281 755 117), trading as Catholic Cemeteries + Crematoria (CCC), is a not-for-profit, Catholic faith-based organisation providing cemetery and crematorium services across Greater Sydney. CCCT is a charity registered with the Australian Charities and Not-for-profits Commission (ACNC).

CCCT is governed by a single corporate trustee: Catholic Cemeteries and Crematoria Limited (CCC Ltd) (ABN 44 638 153 689), a not-for-profit public company limited by guarantee, also a charity registered with the ACNC.

CCC's Head Office is located at Level 2, 11 Murray Rose Avenue, Sydney Olympic Park NSW 2127.

The organisation is governed by a Board that meets bimonthly and is supported by three specialist sub committees:

- Finance, Investment & Remuneration Committee
- Audit, Risk & Governance Committee
- Community Advisory Committee

CCC operates within a comprehensive legislative and regulatory environment, including but not limited to:

- Cemeteries and Crematoria Act 2013 (NSW)
- Crown Land Management Act 2016 (NSW)
- Public Health Act 2010 (NSW)
- Australian Charities and Not for profits Commission Act 2012 (Cth)
- Catholic Cemeteries and Crematoria Trust Act 2024 (NSW)

These frameworks guide CCC's governance, operational responsibilities, and stewardship of Crown land and perpetual care obligations.



Our Governance Framework

CCC's approach to managing modern slavery risks is underpinned by a structured governance framework that embeds oversight, accountability, and continuous improvement across our operations. This framework continues to guide CCC's procurement practices.

The procurement function is overseen by the Chief Financial Officer, ensuring strong alignment between financial governance, supplier engagement, and ethical sourcing practices.

To strengthen organisational capability, CCC established a Modern Slavery Working Group (MSWG) in 2022. The MSWG brings together representatives from Finance, Human Resources, and Marketing to coordinate CCC's corporate response to modern slavery. Its responsibilities include:

- › Advising on modern slavery risks
- › Supporting implementation of the Modern Slavery Action Plan

- › Overseeing supplier engagement and due diligence activities
- › Promoting awareness and capability across the organisation

In 2025, the MSWG met twice to review progress, assess emerging risks, and support the ongoing development of CCC's anti slavery initiatives.

CCC's modern slavery governance structure includes the following layers of oversight:

1. Board
2. Audit, Risk & Governance Committee (ARGC)
3. Chief Executive Officer
4. Modern Slavery Working Group
5. Chief Financial Officer

This structure ensures that modern slavery risk management is embedded across strategic, operational, and procurement functions, with clear lines of accountability and reporting.

Our Operations

CCC manages a network of cemeteries across Western Sydney, providing dignified burial and memorial services that honour the diverse cultural and religious needs of the communities we serve. Our current operational footprint includes four established cemeteries located in Rookwood, Kemps Creek, Liverpool, and Macarthur Memorial Park, which was completed in April 2025 and is now fully operational. These sites form the core of our service delivery and long term stewardship responsibilities.

CCC also oversees the operations of North Rocks Catholic Cemetery, ensuring continuity of care, ongoing maintenance, and pastoral support for families connected to this historic site. Together, these operations reflect CCC's commitment to delivering accessible, compassionate, and enduring cemetery services across Western Sydney. Our work is supported by strong governance, active community engagement, and long term planning to ensure that our services remain sustainable, respectful, and responsive to community needs.

Our Reach



Penrith



Nepean
Gardens



Kemps Creek
Memorial Park



Macarthur
Memorial Park



Campbelltown



Liverpool
Cemetery



Parramatta



Rookwood
Catholic Cemetery



North Rocks
Catholic Cemetery



Hornsby



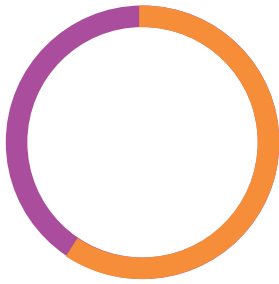
Sydney



Our Organisation

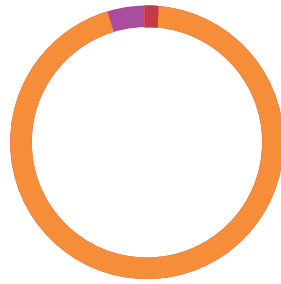


Our Team



Staff Diversity

| | |
|--------|----|
| Male | 48 |
| Female | 35 |



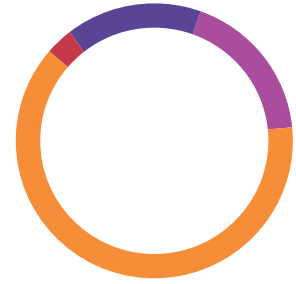
Employment Mix

| | |
|--------------------|----|
| Permanent | 73 |
| Part-time & Casual | 7 |
| Temp | 3 |



Age Diversity

| | |
|-----|----|
| 20s | 5 |
| 30s | 27 |
| 40s | 17 |
| 50s | 23 |
| 60s | 11 |



Lengths of Service

| | |
|-------------|----|
| 0-5 years | 49 |
| 6-10 years | 18 |
| 11-20 years | 14 |
| 21+ years | 2 |

Our Supply Chain

CCC maintains a diverse supplier base comprising both short-term engagements and long-term strategic partnerships. Procurement arrangements vary by category: goods are typically sourced under supplier-defined terms, while service contracts are negotiated to align with CCC’s operational, ethical, and risk management requirements.

In addition to suppliers, CCC works closely with community groups and funeral directors, who play an important role in service delivery across its cemeteries. CCC does not participate in joint ventures.

Procurement governance was strengthened through the full implementation of the Procurement Strategy on 1 April 2022. This established a centre-led procurement model and introduced a centralised “one stop shop”

procurement portal. The model enables consistent oversight of supplier onboarding, contract management, and the administration of common-use contracts, which represent a significant portion of CCC’s total expenditure.

During the reporting period, CCC engaged 455 direct suppliers, with total procurement spend exceeding \$32.3 million. The majority of this expenditure was directed to Australian-based suppliers, supporting local industry and improving supply chain visibility.

Where international supply chains are involved, particularly in categories such as stone, ICT hardware, and construction materials, CCC recognises the increased exposure to modern slavery risks and continues to strengthen due diligence processes.

Criteria 3: Modern Slavery Risk



CCC undertook a structured assessment of modern slavery risk across its supply chain using the ACAN Category Risk Taxonomy. This framework enabled identification of procurement categories with elevated inherent risk based on factors such as:

- › High-risk geographic exposure
- › Labour-intensive industries
- › Complex, multi-tier supply chains with limited visibility

The assessment identified several higher-risk categories, including:

- › Construction
- › Graves and monuments
- › Landscaping
- › Labour hire
- › Cleaning and security services
- › ICT hardware
- › Uniforms and furniture

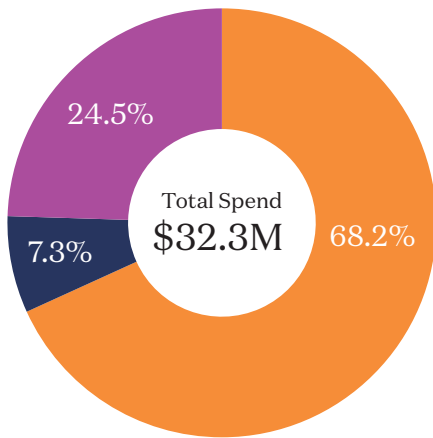
These categories may involve vulnerable worker populations, reliance on imported materials from higher-risk regions, or subcontracting arrangements that reduce transparency.

Insights from this analysis informed the development of CCC's Modern Slavery Risk Dashboard, which consolidates procurement and supplier data to provide a clearer view of inherent risk exposure. The dashboard supports a more targeted and proactive approach to supplier engagement and due diligence.

The dashboard is not intended to determine actual modern slavery risk at the supplier level. Instead, it highlights categories where further investigation is warranted. Determining actual risk requires deeper analysis, including supplier engagement, documentation review, and insights from contract managers and operational stakeholders.

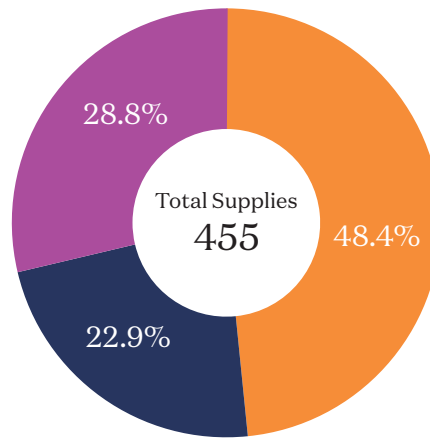
Modern Slavery Risk Dashboard

Spend Risk Distribution



| | | |
|--------------|-----------------|-------------|
| High | \$22.03M | 68.2% |
| Medium | \$2.36M | 7.3% |
| Low | \$7.91M | 24.5% |
| Total | \$32.30M | 100% |

Supplier Risk Distribution



| | | |
|--------------|------------|-------------|
| High | 220 | 48.4% |
| Medium | 104 | 22.9% |
| Low | 131 | 28.8% |
| Total | 455 | 100% |

Key Insights:

68.2% of total procurement is in high-risk categories.

220 suppliers (48.4%) are classified as high risk.

Risk exposure is driven more by spend concentration than supplier count, with high-value categories contributing to overall modern slavery risk.

High-Risk Categories and Spend

This table summarises CCC's highest risk procurement categories and associated annual expenditure. These categories inherently present greater modern slavery risk due to industry characteristics, workforce vulnerability, or geographic sourcing factors.

| High-Risk Sector | Spend |
|---------------------------------|--------------|
| Construction | \$12,571,582 |
| Graves & Monuments | \$2,687,509 |
| Landscaping | \$1,974,556 |
| Facilities Management | \$1,159,922 |
| Labour Hire | \$1,153,369 |
| Catering and Venue Hire | \$579,456 |
| Furniture | \$430,468 |
| ICT | \$414,920 |
| Cleaning | \$367,727 |
| Office and Educational Supplies | \$281,337 |
| Waste Management | \$231,763 |
| Security | \$123,737 |
| Uniforms | \$47,989 |

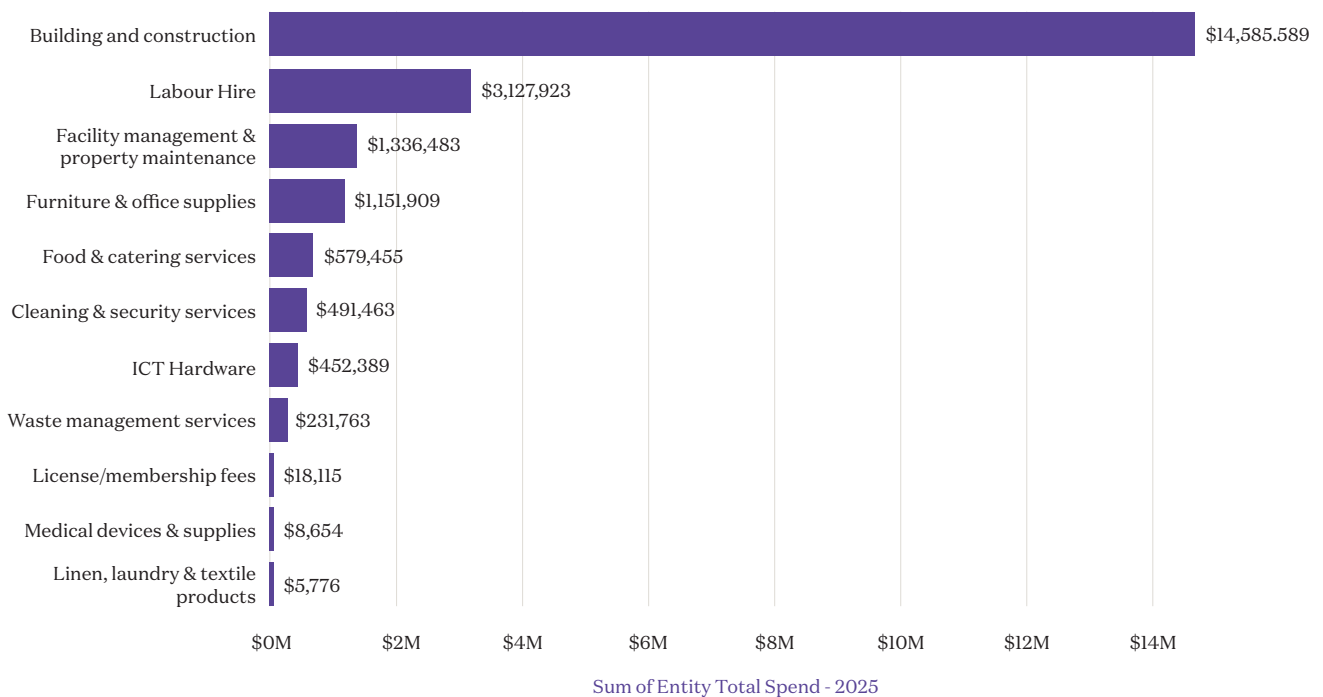
Four key factors are also used to determine the level of risk:

- › **Geography:** the country or location where a good is made or service is delivered
- › **Industry:** the sector in which the making of goods or delivery of service occurred
- › **Commodity:** the raw materials or components that comprise the goods or products
- › **Workforce vulnerability:** such as bonded visas, temporary migrants, women or children known to be employed in specific industry sectors

Domus 8.7: trends, cases, and risk intelligence identified through the Domus 8.7 remediation service, including grievances and remediation insights relevant to category and risk to workers.

Modern Slavery Risk by ACAN Taxonomy Category

This visual categorises CCC’s procurement activity according to the ACAN inherent risk taxonomy, providing a structured view of risk distribution across procurement categories.



Tier 1 Supplier Sourcing Countries

Overall inherent risk category ● high ● medium



Tier 1 suppliers source goods and services from a range of countries. Some of these regions present elevated modern slavery risk due to governance, labour conditions, or industry practices.

Internal Workforce Risk

CCC maintains strong confidence that the risk of modern slavery within its internal workforce is low. This is supported by robust policies, systems, and employment practices that ensure compliance with Australian workplace laws and uphold the dignity and wellbeing of staff.

Key safeguards include:

- › **Employment practices:** Recruitment decisions are based on merit, equal opportunity, and compliance with relevant legislation.
- › **Pay and conditions:** Pay rates are reviewed annually to ensure compliance with minimum standards and CCC's internal instruments.
- › **Labour hire oversight:** Agencies supplying labour, including apprentices, must comply with award conditions and provide CCC with pay rate information for all personnel.
- › **Anti-discrimination:** CCC's Code of Conduct reinforces respect, diversity, and inclusion.
- › **Whistleblower protections:** CCC's Whistleblower Policy protects individuals who report illegal or improper conduct.

Criteria 4: Actions Taken to Assess and Address Modern Slavery Risk



CCC continued to strengthen its modern slavery risk management activities during the reporting period, with a focus on awareness, monitoring, supplier engagement, and continuous improvement across procurement and governance functions.

Management Systems

CCC has established a comprehensive set of policies, processes, and an action plan to address modern slavery risks. The Board recognises the significance of these risks and provides oversight, while the Leadership Team ensures due diligence is embedded across operations.

Key elements include:

- › Defined governance structures supporting oversight and accountability
- › Controls to identify, manage, and report modern slavery risks
- › A dedicated Modern Slavery Working Group driving implementation and improvement
- › Regular review of policies and procedures to ensure alignment with best practice

Risk Management

CCC's risk management framework incorporates a dynamic feedback loop that integrates new insights and emerging risks. The organisation uses Risk Wizard software to:

- › Capture and record incidents
- › Assess severity and likelihood
- › Map corrective actions
- › Track progress and closure

Operational teams are regularly engaged to identify risks beyond wage compliance,

ensuring a holistic view of potential vulnerabilities. This system enables proactive risk management and prioritisation of resources.

Procurement and Supply Chain

Modern slavery considerations are embedded within CCC's procurement framework and contract management processes. Key actions include:

- › Integrating modern slavery criteria into tender evaluations
- › Investigating suppliers associated with adverse information
- › Communicating CCC's expectations to all suppliers
- › Conducting surveys with potentially high risk suppliers to assess their awareness and controls
- › Using SEDEX data to identify risks within multi tier supply chains

While supplier performance is regularly monitored for quality and delivery, CCC continues to strengthen its approach to monitoring ethical and labour related performance indicators and including modern slavery awareness onto the performance evaluation assessment.

The ACAN Program provides supplier engagement support and data, enabling a systematic and comprehensive supply chain risk assessment. In 2025 the ACAN Modern Slavery Risk Management Program launched a new purpose-built data management platform - ROTA. ROTA centralises the ACAN Risk Management Program framework and facilitates supplier performance evaluation and engagement.

Stakeholder Engagement

CCC has communicated its commitments and expectations to internal and external stakeholders, reinforcing accountability for continuous improvement. Grievance mechanisms are available to staff, labour hire contractors, and customers through:

- › The Whistleblower Policy
- › The Complaints Policy

At present, these mechanisms do not extend to workers within CCC's supply chains, and this remains an area for future development.

Grievance Mechanism

CCC's Whistleblower Policy and Grievance Procedure support a culture of transparency and ethical behaviour. These mechanisms encourage stakeholders to report unethical, illegal, corrupt, or fraudulent practices. CCC continues to strengthen staff capability to identify and respond to indicators of poor labour practices, unsafe working conditions, or modern slavery.

All staff are required to complete annual Respect at Work training refresher via CCC's custom build online module, which includes CCC's grievance processes.

Remediation

CCC is committed to ensuring appropriate and timely remediation for individuals impacted by modern slavery, consistent with the UN Guiding Principles on Business and Human Rights and the Commonwealth Modern Slavery Act guidance. This includes:

- › Addressing harm and root causes
- › Working with responsible entities where CCC is directly linked to modern slavery
- › Implementing measures to prevent recurrence

CCC is a founding member of Domus 8.7. Domus 8.7 was established as an agency of the Catholic Archdiocese of Sydney in 2020 as a key element of the ACAN Modern Slavery Risk Management Program. This collaborative approach to remediation is aligned with the Modern Slavery Act and Catholic Social Teaching which are centred on the needs, wellbeing and empowerment of people impacted.

Domus 8.7 provides CCC:

- resources that enable us to listen to workers (grievance channel)
- a 24/7 careline for workers on our sites, staffed by professional counsellors
- direct support to people impacted by modern slavery
- guidance and technical assistance to prevent, identify and remediate modern slavery
- a documented process to assess if an organisation has caused, contributed or is directly linked to modern slavery and modern slavery indicators

Investments

CCC is committed to responsible investment practices that align with its mission, Catholic values, and ethical expectations. CCC's Investment Policy is grounded in Catholic Social Teaching and informed by Mensuram Bonam – Faith Based Measures for Catholic Investors. It requires investment decisions to promote human dignity, uphold the common good, and avoid contributing to harm or exploitation.

The Ethical Statement within the Investment Policy requires investment managers, advisers, and underlying funds to assess and monitor investments against globally recognised norms relating to human rights, labour standards, environmental stewardship, and corruption. CCC applies an ethical investment framework that incorporates exclusion of activities incompatible with Catholic values, active stewardship and engagement with investment managers, and, where practicable, enhancement through investment in activities that support positive social and ethical outcomes.

As part of this framework, CCC receives regular ethical screening and proxy voting reports from its investment advisor, Russell Investments. Russell Investments is a member of Investors Against Slavery and Trafficking (IAST), supporting CCC's commitment to identifying, mitigating, and responding to modern slavery risks within investment portfolios.



Modern Slavery Action Plan

The Action Plan below outlines CCC’s progress in strengthening its modern slavery risk management framework and sets out the next phase of planned activities. The achievements from 2020–2025 reflect the organisation’s growing maturity, while the 2026 plan focuses on deepening supplier engagement, enhancing governance, and expanding capability across the organisation.

| Achievements 2020–2025 | Plan for 2026 |
|---|--|
| <ul style="list-style-type: none"> › Established the Modern Slavery Policy. › Integrated modern slavery risk considerations into CCC’s operations and supply chain processes. › Established the Modern Slavery Working Group (MSWG). › Promoted employee awareness through internal newsletters and communications. › Implemented anti slavery clauses in Purchase Orders. › Embedded modern slavery requirements into tendering processes. › Surveyed 60 high risk suppliers to assess their awareness and controls. › Continued active participation in the Australian Catholic Anti Slavery Network (ACAN). › Delivered modern slavery awareness presentations at staff Town Hall meetings. › Conducted annual reviews of modern slavery risks. › Re-surveyed potential high risk suppliers through ACAN to monitor progress. › Continued to promote modern slavery awareness among employees. › Used CCC’s social media channels to promote modern slavery awareness within the community. › Renewed CCC’s participation in ACAN for ongoing collaboration and capability building. | <ul style="list-style-type: none"> › Review procurement strategy and framework. › Conduct the annual review of modern slavery risks across operations and supply chains. › Re survey high risk suppliers to assess improvements in their modern slavery controls and transparency. › Strengthen supplier engagement by expanding the use of SEDEX and other ethical sourcing tools. › Appoint a Procurement Officer to strengthen procurement governance, supplier oversight, and ethical sourcing practices. › Continue CCC’s participation in ACAN and adopt new tools and resources as they become available. |

Criteria 5: Assessing Effectiveness



The ACAN activity data table provides a comparative measure of supplier engagement and program activities to measure CCC's progress.

| Catholic Cemeteries and Crematoria Trust | Activity | 2024 | 2025 |
|--|--|------|------|
| Internal Staff | Hours spent on modern slavery activities | 160 | 245 |
| | Individual staff completed e-learning | 0 | 0 |
| | E-learning modules completed | 0 | 0 |
| External/Supplier Engagement | Total number of suppliers | 519 | 455 |
| | Number of suppliers across high-risk categories | 39 | 170 |
| | Number of ACAN Supplier Surveys completed | 128 | 177 |
| | Supplier staff attending capacity building webinars | 12 | 1 |
| | Invited to join Sedex | 30 | 22 |
| | Joined Sedex | 38 | 12 |
| | Sedex SAQ completed | 7 | 15 |
| | Social audits | 0 | 0 |
| | Corrective actions | 0 | 0 |
| Domus 8.7 External Referrals | Contacts made via worker voice/grievance mechanism | 0 | 0 |
| | Referrals for advise and assistance | 0 | 0 |
| | Individuals identified or referred for modern slavery assessment | 0 | 0 |
| | Individuals with modern slavery cases remediated | 0 | 0 |

Criteria 6: Consultation with Owned or Controlled Entities



Catholic Cemeteries & Crematoria Limited (CCC Ltd) is the Trustee of the Catholic Cemeteries & Crematoria Trust (CCCT). Regular consultation on Modern Slavery occurs with the Board of CCC Ltd in their capacity as trustees of the trust.

Criteria 7: Any Other Relevant Information



No other relevant information to report.



**Catholic
Cemeteries +
Crematoria**

Rookwood Catholic Cemetery

Barnet Avenue, Rookwood, NSW 2134

Phone: 1300 114 997

enquiries@catholiccemeteries.com.au

www.catholiccemeteries.com.au

North Rocks Catholic Cemetery

North Rocks Road, North Rocks, NSW 2151

Phone: 1300 114 997

enquiries@catholiccemeteries.com.au

www.catholiccemeteries.com.au

Liverpool Cemetery

207 Moore St, Liverpool 2170

Phone: 02 9602 0344

info@liverpoolcemetery.com.au

www.liverpoolcemetery.com.au

Kemps Creek Memorial Park

230-260 Western Rd, Kemps Creek, NSW 2178

Phone: 02 9826 2273

admin@kempscreekcemetery.com.au

www.kempscreekmemorialpark.com.au

Macarthur Memorial Park

166-176 St Andrews Rd, Varroville NSW 2566

Phone: 1300 086 689

Email: info@mmpark.com.au

www.mmpark.com.au

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