



Catholic  
Cemeteries +  
Crematoria

# Modern Slavery Statement

1 January 2023 – 31 December 2023



## Disclosure Note

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

### Head Office:

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

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## CEO Statement, Approval & Signature by Board Chair

At Catholic Cemeteries + Crematoria (CCC) we strive to live our values in everything we do. These values include faith, respect, compassion, collaboration, and integrity. Central to our ethos is a profound respect for the dignity of every individual, recognising each person as an invaluable creation, mirroring the image of God. This fundamental belief underpins our commitment to social responsibility, community engagement, and ethical conduct across all levels of our organisation.

Our dedication to upholding the dignity of the human person drives us to advocate for the vulnerable and marginalised, ensuring that our corporate practices contribute positively to society. It is this core belief that drives us to take decisive action against any form of modern slavery within our sphere of influence. Therefore, we have chosen to voluntarily comply with the *Modern Slavery Act 2018* and are pleased to submit our fourth modern slavery statement to the Australian Government via the Australian Catholic Antislavery Network Compendium of Modern Slavery Statements.

Our commitment reflects our dedication to ethical business practices and our resolve to embody the compassion, respect, and love central to our Catholic faith.

CCC will continue to work with our board, staff, suppliers, ACAN and our broader stakeholders to evaluate, monitor, and enhance our anti-slavery initiatives. Together, we strive towards a future where our collective efforts create a world that values freedom and dignity for everyone.



**Lauren Hardgrove**  
Chief Executive Officer



**The Hon Greg Smith SC**  
Chair



Lauren Hardgrove, Chief Executive Officer



The Hon Greg Smith SC, Chair

This Modern Slavery Statement was approved by the principal governing body of Catholic Metropolitan Cemeteries Trust as defined by the *Modern Slavery Act 2018* (Cth) (“the Act”) on 17th April 2024.

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

# Criteria 1: About us

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This statement involves the Catholic Metropolitan Cemeteries Trust (ABN 85 744 325 709), trading as Catholic Cemeteries + Crematoria (CCC), a Trust constituted under the *Crown Lands Act 1989* (NSW) and currently transitioning to a Crown Land Manager pursuant to the *Crown Land Management Act 2016* (NSW). It is not controlled by any other entity.

It is registered as a charity with the Australian Charities and Not-for-Profits Commission. It has been serving the Sydney community for over 150 years, commencing operations in 1867 at Rookwood Catholic Cemetery.

CCC believes that everyone has the right to a dignified funeral and enduring, future care of the family's resting place. CCC believes that cemeteries are sacred and historical places in our society for the preservation of memories, and that the funeral is just the beginning of our role.

While it is not required to comply with the mandatory reporting of the *Modern Slavery Act 2018* (Cth) as our turnover is less than \$100m, the Board is committed to an antislavery risk management program through practical measures such as anti-slavery supply chain strategies and procurement, as well as anti-slavery education and engagement initiatives.

CCC's 2023 audited financial statement highlights a \$31.4m operating revenue and \$15.8m investing income generating \$16.2m surplus.

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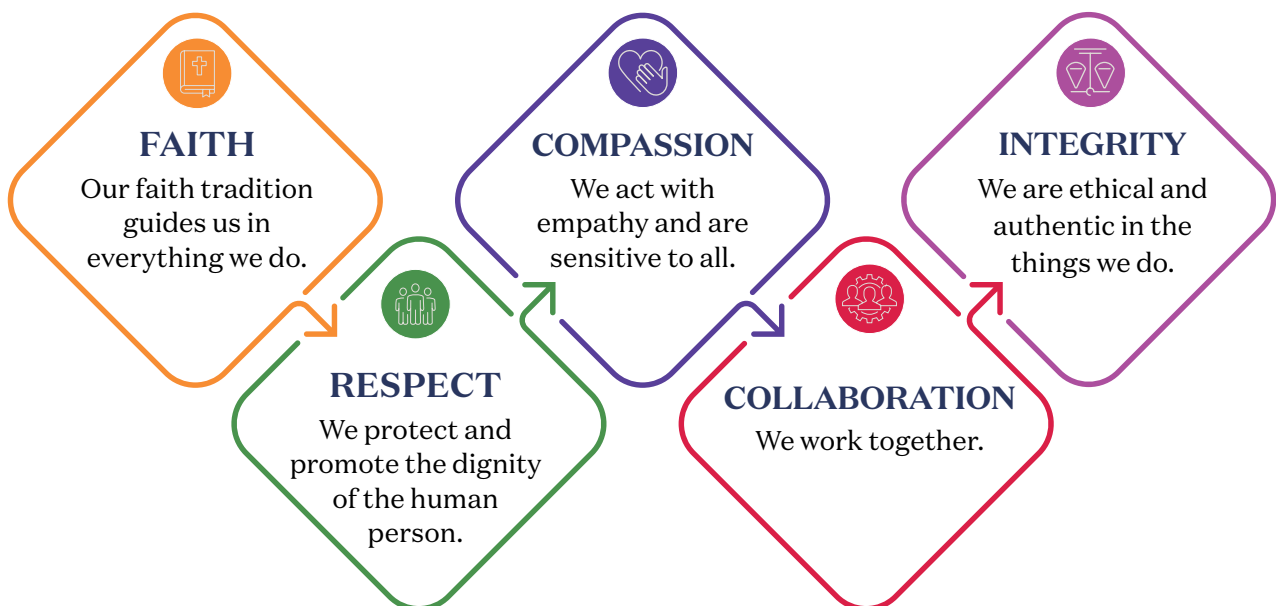
## Our Vision + Mission

Together our mission and vision statements provide a roadmap for CCC's direction, motivation, and inspiration. They serve as a touchstone for all decision-making and help ensure we stay focused on our core purpose and long-term goals.



## Values

Values have been at the heart of CCC's identity from its inception. At CCC, we strive to live our values in our work, decision making and engagement. As we face the future, CCC remains committed to these values, which have been part of our fabric for decades.



# Criteria 2: Operations and Supply Chain

2

## Our Organisational Structure

CCC is an independent not-for-profit organisation and one of the largest cemetery trusts in NSW, managing and delivering high quality cemetery services to a diverse range of communities and families across Western Sydney.

Its Head Office is located at: Level 2, 11 Murray Rose Ave, Sydney Olympic Park NSW 2127.

The Board meets bimonthly and has established the following sub-committees to assist in performing its duties:

- Finance, Investment & Remuneration
- Audit, Corporate Governance & Risk Management
- Community Advisory
- Project Development

CCC has obligations under legislation and guidelines 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 Commissions Act 2012* (Cth)

## Our Governance Framework

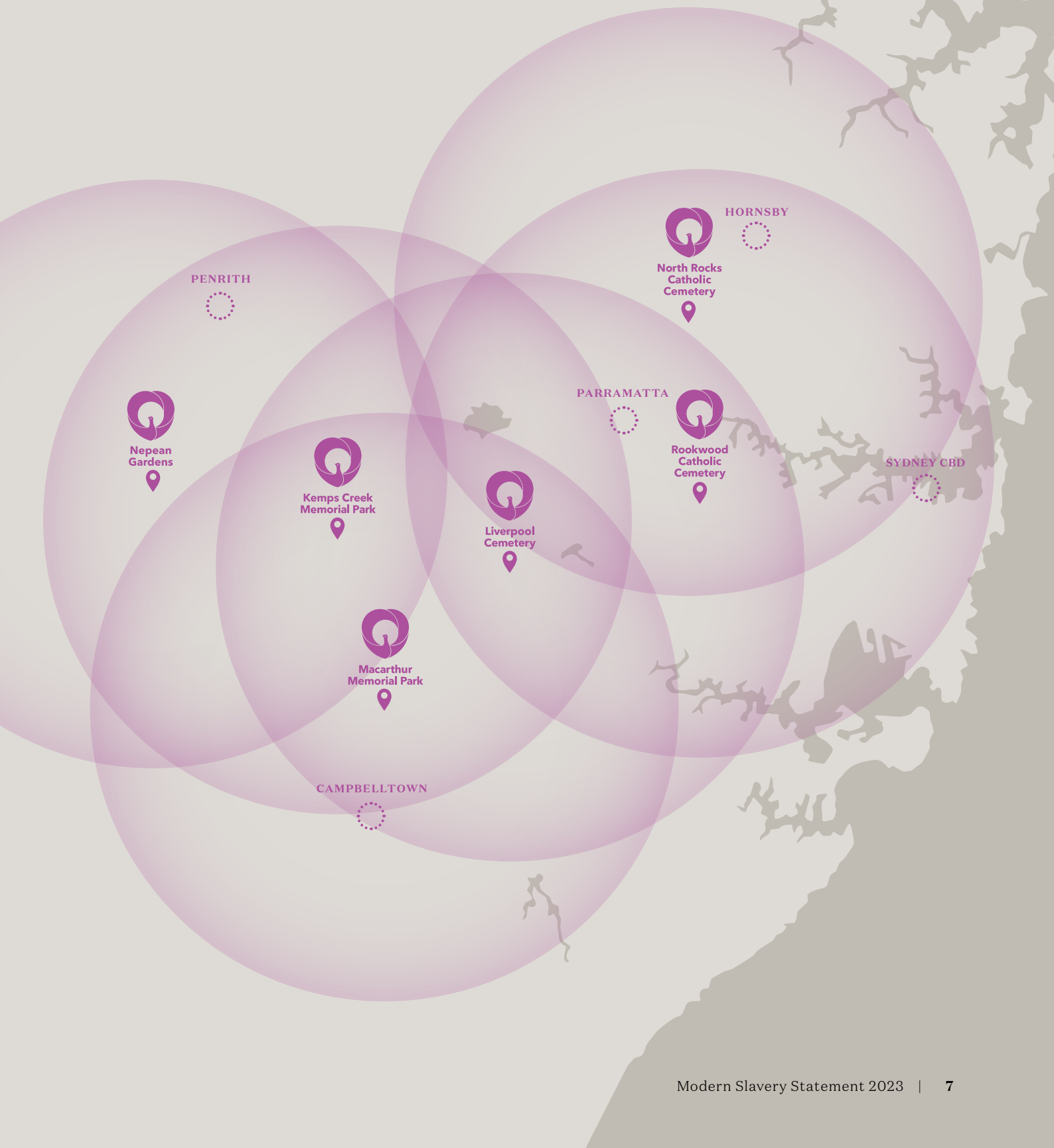
Modern Slavery initiative has the following governance framework in CCC:

- (b) Board,
- (c) Audit, Risk Management & Corporate Governance Committee (ARMCGC)
- (d) CEO
- (e) Modern Slavery Working Group
- (f) CFO

The Board approved the Procurement Strategy Plan in February 2020 which incorporated ACAN's Modern Slavery Risk Management Program tools and resources. The CFO is responsible for the procurement function and participates with the respective Directors of Human Resources and Marketing Departments in the Modern Slavery Working Group (MSWG), that periodically reports to the CEO and the ARMCGC. In 2023 the MSWG met twice.

## Our Operations

CCC currently operates three cemeteries in the Western Sydney area. These cemeteries are located at Rookwood, Kemps Creek, and Liverpool. In addition, we have commenced construction of MacArthur Memorial Park and received Development Approval for Nepean Gardens Memorial Park. CCC also maintains the operation of North Rocks Catholic Cemetery.



# Our Organisation

CCC has a clearly defined organisational structure comprising six departments reporting to the CEO:



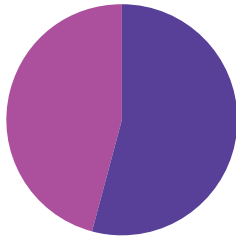




## Our Team

96

members of staff

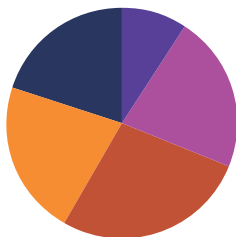
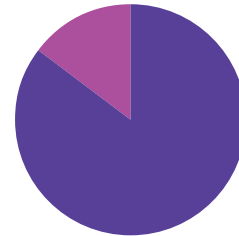


### Staff Diversity

● Male	52
● Female	44

### Employment Mix

● Permanent	82
● Part-time & Casual	14

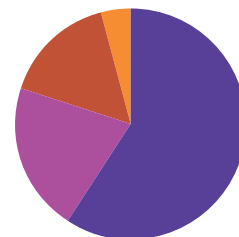


### Age Diversity

● 20's	9
● 30's	21
● 40's	26
● 50's	21
● 60's	19

### Length of Service

● 0-5 years	57
● 6-10 years	20
● 11-20 years	15
● 21+ years	4



Sourced from CCC's 2023 Annual Report, highlights a profile of our employees and services.

## Workforce Profile

Current supplier relationships are a combination of short and long-term engagements. For the supply of goods, contractual terms are generally dictated to us while supply of services involves a negotiation process. Other than suppliers, CCC's key business relationships are with Community Groups and Funeral Directors. There are no joint ventures.

The Procurement Strategy has been fully implemented as of 1 April 2022 with the establishment of an appropriately resourced 'center-led' procurement function and going live with a 'one-stop-shop' procurement portal. An important outcome of the Procurement function is organising and managing "common use" contracts covering a substantial proportion of OPEX and CAPEX. This reduces the risk of CCC inadvertently being linked or connected to modern slavery. CCC is developing longer-term partnerships with our suppliers, while continually assessing alternative sources of supply. Only those suppliers who can meet our standards are appointed.

## Our Supply Chain

Over 12 months ending Dec 2023, CCC purchased over \$61.54m of goods and services mainly from 228 direct suppliers. Our suppliers range from construction, stone masons, cleaners, security, legal, landscaping, labour hire, IT advisors, and waste service providers. All procurement was sourced from Australian suppliers.

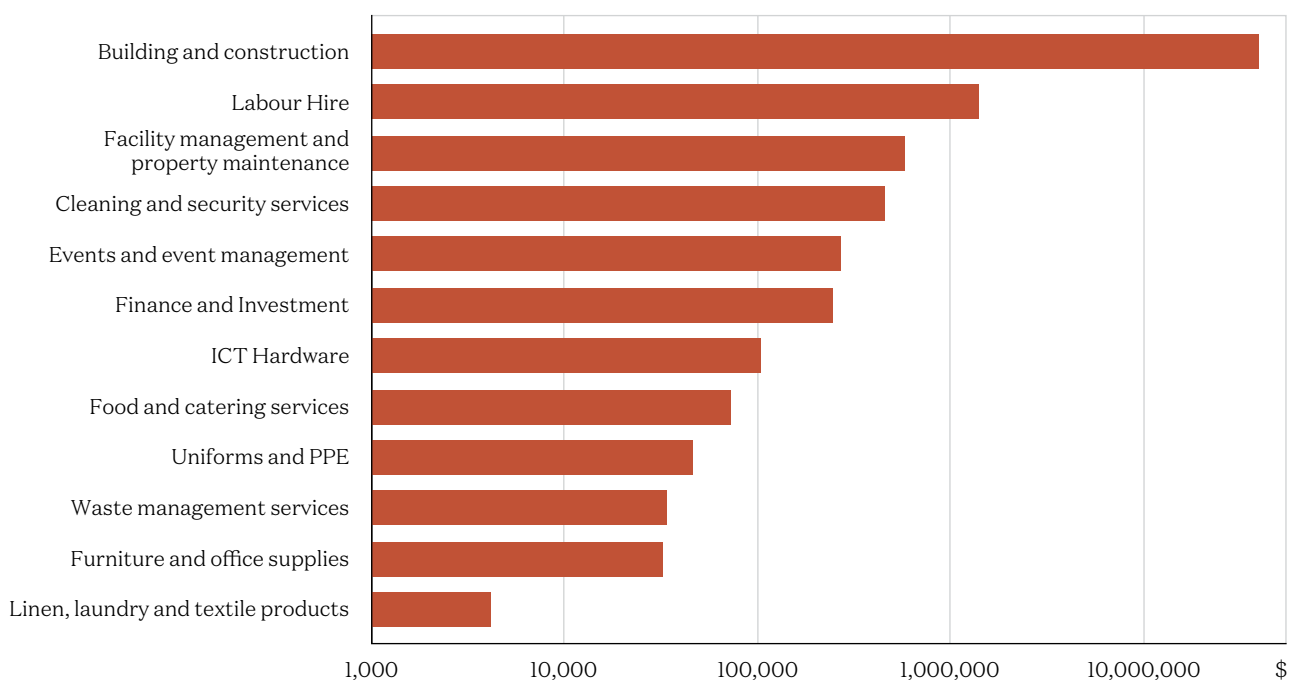
# Criteria 3: Modern Slavery risks in Operations and Supply Chain



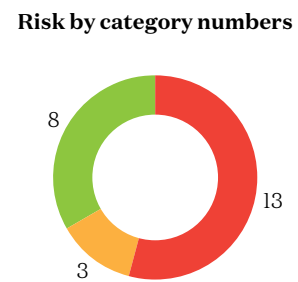
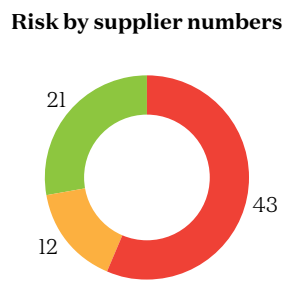
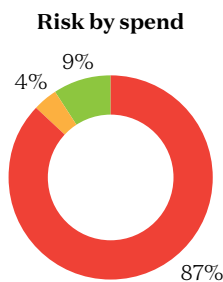
In 2023, we identified the potential highest risk suppliers according to the ACAN Category Risk Taxonomy. This formed the basis of below supplier dashboard. It provides an overview of the scope and scale of potential modern slavery risk within CCC’s supply chain and is the first step in developing robust risk management systems. The information was sourced from the 2023 calendar year and the indicators of potential risk are based on the best available information as disclosed by ACAN.

Supplier	2023 \$
Linen, laundry, and textile products	4,144
Furniture and office supplies	32,263
Waste management services	33,918
Uniforms and PPE	45,933
Food and catering services	73,917
ICT Hardware	103,552
Finance and Investment	246,844
Events and event management	273,277
Cleaning and security services	461,832
Facility management and property maintenance	575,832
Labour Hire	1,423,402
Building and construction	40,170,199

**Spend on High Risk categories**



Risk	■	■	■	
Spend risk (\$)	\$44,679,036	\$2,065,866	\$4,610,863	<b>\$51,355,765</b>
Supplier risk (No.)	43	12	21	<b>76</b>
Category risk (No.)	13	3	8	<b>24</b>



The Dashboard does not attempt to determine actual risk to the organisation, or the modern slavery risk presented by individual suppliers. Determining actual risk requires detailed information, analysis and investigation from multiple sources and stakeholders.

For example, “Graves & Monuments” may have the risk with materials imported from overseas. “Construction” and “Facilities” may represent a risk due to migrant workers from many overseas countries.

The graph above highlights CCC has 13 potential high-risk categories involving 43 suppliers that constitutes 87% of the overall spend.

13 potential high-risk categories refer to Construction, Grave & Monuments, Landscaping, Facilities, Cleaning, Security, Information and Communications Technology, Uniforms, Catering & Venue Hire, Waste, Stationery & General Office Supplies, Laundry Services and Furniture.

The key area of potentially-risk suppliers is in Construction, Grave & Monuments, Landscaping services and Facilities Management totaling \$43.9m. This has increased from \$7.3m in 2022 due to the civil infrastructure and building construction projects in MacArthur Memorial Park.

The next major areas of potentially high-risk suppliers are with Cleaning and Security totaling \$462k.

CCC is confident that our risk to modern slavery through our internal staff is low due to a range of policies, systems and practices we have in operation. These include Human Resource policies which are intended to ensure that all staff are paid at above award rates according to their role and qualifications. All employment information is captured through our HR Information System and Payroll System to manage our staff and their relevant employment and pay details.

The key points are:

- Employment – as per our Recruitment and Selection procedure, selection is based on merit, equal employment opportunity and relevant Federal and State Legislation.
- Rates of pay are checked annually to ensure they meet minimum standards.
- Labour hire agencies inclusive of apprentices are also governed by legislation ensuring minimum award rates of pay to all employees. All agencies are engaged on the basis that they reflect pay rates based on Catholic Cemeteries relevant instruments and provide us with pay rates to labour hire personnel.
- Anti-Discrimination is outlined in our Code of Conduct – we value the diversity of our people, and as such have employees from a wide diverse.
- Protection of individuals who disclose information about illegal or improper conduct occurring within CCC is outlined in our Whistleblower policy.

# Criteria 4: Actions taken to assess and address risk

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The focus in 2023 was to promote employees and suppliers' awareness, risk monitoring and ongoing procurement action to address modern slavery.

## Category Summary

### Management Systems

CCC has policies, processes, and a plan of action. Our Board understands the risk of Modern Slavery and the Leadership team exercises due diligence and ensures our system for managing Modern Slavery risk is effectively implemented, reviewed, and improved where necessary. We have an enterprise grade business system in place to identify, manage and report on modern slavery risks, incidents, and corrective actions. Our governance framework is clear, and we have a team specifically dedicated to driving modern slavery mitigation efforts.

### Risk Management

The CCC risk management framework is actively used and has a dynamic feedback loop to incorporate new learnings. We use the software Risk Wizard to capture incidents, grade the severity, map a course of action and track progress in mitigating the risk. We review and engage our operational staff to identify additional issues, beyond wage compliance. Our system is developed to monitor risk and enables us to actively manage and prioritize areas where our resources need to be applied.

### Human Resources and Recruitment

CCC has commenced incorporating modern slavery issues into our employee or contractor training and awareness programs. In 2023 our aim is hiring and onboarding processes that reference modern slavery risk management. We have policies and systems in place to identify and mitigate the risk of modern slavery in recruitment, payment of wages, etc.

A training module for modern slavery will commence deployment to relevant staff members. In addition, CCC are implementing specific policies and processes to assist in the induction of labour hire companies and/or outsourcing of jobs to subcontractors.

### Procurement and Supply Chain

Our procurement framework is actively used and has a dynamic feedback loop to incorporate learnings into better decision making and risk management. Our contract management and tender process takes modern slavery parameters into account and is used for decision making when awarding tenders. We investigate instances and suppliers regarding adverse information. We do not monitor performance regularly, except for quality and delivery issues.

We have progressed with our supplier engagement strategy by communicating our intent to all suppliers on this matter and surveying all potentially high-risk suppliers on awareness and actions to MS. In addition, we subscribe to SEDEX to identify risk in the supply chain of our potentially high-risk suppliers.

### Stakeholders

CCC has communicated our commitments and values to the stakeholders and setting accountability for how to drive the improvement of this issue. Through our whistle blower policy (staff and labour hire contractors) and complaints policy (customers), we have an active, anonymous, and efficient grievance mechanism. However, it does not target workers in our supply chains.

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## Grievance Mechanism

CCC has developed Whistleblower Policy and Grievance Procedure to promote a culture of honest and ethical behaviour by encouraging stakeholders of CCC to report concerns of any actual or suspected unethical, illegal, corrupt, or fraudulent practices involving CCC's business. CCC is building capacity of its direct employees and stakeholders to recognise and respond to indicators of poor labour practices, unsafe working conditions and modern slavery in its operations and supply chains and raise these concerns to management.

## Remediation

CCC is committed to ensuring it provides appropriate and timely remedy to people impacted by modern slavery in accordance with the *United Nations Guiding Principles on Business and Human Rights*, *Commonwealth Modern Slavery Act 2018 – Guidance for Reporting Entities*, relevant Australian laws, and best practice guidance regarding informed consent of those impacted. This also includes providing for, or cooperating in, actions to address harm to people and root causes to mitigate future risks if CCC is found to have caused or contributed to modern slavery.

Where CCC is directly linked to modern slavery by a business relationship, we are committed to working with the entity that caused the harm to ensure remediation and mitigation of its recurrence.

As an ACAN participating entity, CCC has access to guidance and support from Domus 8.7, an agency of the Catholic Archdiocese of Sydney which focused on providing support, advice on how to respond to suspected or actual situations of modern slavery.

## Our Investments

CCC seeks to invest as a responsible community member, and to ensure that the investments are consistent with its specific mission, the values of the Catholic Church and the broader arena in which the Trust operates.

The Ethical Statement within the CCC Investment Policy requires investment managers of managed funds to monitor the portfolio in relation to globally accepted norms on corporate sustainability behaviors in the areas of Human Rights, Labour, Environment and Corruption.

In addition, on an annual basis we receive a proxy voting report from our Investment Advisor, currently Russell Investments, as well as a report on those companies with their main businesses that engage in unethical or undesirable practices.

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## Modern Slavery Action Plan

Achieved in 2020–2023	Plan for 2024
<ul style="list-style-type: none"><li>› Established the Modern Slavery Policy.</li><li>› 2020, 2021 &amp; 2022 Annual Statements are published on CCC website &amp; Procurement Portal.</li><li>› Incorporated Modern Slavery risk into CCC's operations and supply chain.</li><li>› Established a Modern Slavery Working Group (MSWG).</li><li>› Promoted employees' MS awareness via Newsletters.</li><li>› Implemented anti-slavery clauses in Purchase Orders.</li><li>› Included Modern Slavery requirements in tendering processes.</li><li>› Surveyed 60 high-risk suppliers to understand their awareness and approach.</li><li>› CCC continued to participate in the Australian Catholic Anti-Slavery Network (ACAN)</li></ul>	<ul style="list-style-type: none"><li>› Prepare 2023 Modern Slavery Statement.</li><li>› Review Modern Slavery Risk annually.</li><li>› MS awareness Presentation to all staff in Townhall meeting.</li><li>› Continuously promote employees' MS awareness.</li><li>› Utilise social media to promote MS awareness among communities.</li><li>› Renew ACAN participation</li></ul>

# Criteria 5: Effectiveness Assessment



Effective assessments include, but not limited to:

- Three MS Newsletters were sent to “All Staff”.
- 582 Purchase Orders were issued with Anti-Slavery clause incorporated in the T&C.
- 713 suppliers’ details were shared with ACAN & Sedex to understand their awareness and approach.
- Partnered with Sedex to create more socially and environmentally sustainable businesses and supply chain.

2023	Activity	Catholic Cemeteries + Crematoria
Internal / staff	Hours spent on modern slavery activities	120
	E-learning modules completed	25
External / supplier engagement	Total number of suppliers	622
	Number of suppliers across high-risk categories	35
	Purchase orders include modern slavery clause	582
	Number of ACAN Supplier Surveys completed	75
	Supplier staff attending capacity building webinars	26
	Invited to join Sedex	12
	Joined Sedex	4
	Sedex SAQ completed	2
	Social audits	1
Corrective actions	0	
Domus 8.7 External referrals	Contacts made via worker voice / grievance mechanism	0
	Referrals for advice and assistance	0
	Individuals identified or referred for modern slavery assessment	0
	Individuals with modern slavery cases remediated	0

## Criteria 6: Consultation with Owned or Controlled Entities

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CCC does not own or control any other entities therefore the criteria are not applicable.

## Criteria 7: Any Other Relevant Information

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No other relevant information to report.