



Catholic
Cemeteries +
Crematoria

Modern Slavery Statement

1 January 2024 - 31 December 2024

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: Andy CAO
Email: andyc@catholiccemeteries.com.au

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Leadership message, Approval and Signature

At Catholic Cemeteries + Crematoria (CCC), our values of faith, respect, compassion, collaboration, and integrity guide every aspect of our work. At the core of our mission lies a profound respect for the dignity of every individual, recognising each person as a unique and invaluable creation reflecting the image of God. This belief forms the foundation of our commitment to social responsibility, community engagement, and ethical conduct throughout our organisation.

Our unwavering dedication to upholding human dignity compels us to advocate for the marginalised and people at-risk ensuring that our practices promote fairness and contribute positively to society. With this conviction, we take decisive actions to address modern slavery in all its forms within our sphere of influence. In line with our values, CCC has voluntarily complied with the Modern Slavery Act 2018 and are proud to submit our fifth modern slavery statement to the Australian Government through the Australian Catholic Antislavery Network (ACAN) Compendium of Modern Slavery Statements.

This statement reflects our steadfast commitment to ethical business practices and our resolve to embody the compassion, respect, and love that lie at the heart of our Catholic faith.

CCC remains dedicated to working collaboratively with our board, staff, suppliers, the Australian Catholic Antislavery Network (ACAN), and our broader stakeholders. Together, we will continue to assess, strengthen, and enhance our anti-slavery efforts. Through our shared commitment, we aspire to create a future where freedom and dignity are upheld for all.



Lauren Hardgrove,
Chief Executive Officer



Danny Casey
Chair

This Modern Slavery Statement was approved by the principal governing body of Catholic Cemeteries & Crematoria Trust as defined by the Modern Slavery Act 2018 (Cth) (“the Act”) on 29th February 2025.

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

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

Danny Casey
Chair

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

Lauren Hardgrove
Chief Executive Officer

Criteria 1: About us

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This statement pertains 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).

Effective 30 June 2024, and in accordance with the Catholic Cemeteries and Crematoria Trust Act 2024 (NSW), all assets, rights, and liabilities of Catholic Metropolitan Cemeteries Trust (CMCT) ABN 85 744 325 709 were automatically transferred to Catholic Cemeteries & Crematoria Trust ABN 54 281 755 11.

The Trust is registered as a charity with the Australian Charities and Not for Profits Commission, serving the Sydney community with dedication and purpose.

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 antislavery education and engagement initiatives.

CMCT's last audited financial statements, prior to transfer to CCC Trust, highlighted \$30.7m operating revenue and \$15.3m investing income generating \$15.1m surplus.



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.



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 been at the heart of CCC's identity from its inception. CCC strives to live its values in its work, decision making and engagement. As it faces the future, CCC remains committed to these values, which have been part of its fabric for decades.



Criteria 2: Our Structure, Operations and Supply Chains

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Our Organisational Structure

CCC is an independent not for profit organisation and one of the largest cemetery trusts in New South Wales. CCC provides high quality cemetery services to support the diverse needs of communities and families throughout 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, Risk & Governance
- › Community Advisory

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)
- › Catholic Cemeteries and Crematoria Trust Act 2024 (NSW)

Our Governance Framework

In February 2020, the CMCT Board approved the Procurement Strategy Plan, incorporating ACAN's Modern Slavery Risk Management Program tools and resources. The Chief Financial Officer leads the procurement function. In 2022, the Modern Slavery Working Group (MSWG) was established, bringing together representatives from the Finance, Human Resources, and Marketing departments to strengthen CCC's corporate response to modern slavery. CCC's MSWG is responsible for advising on issues related to Modern Slavery and supporting the development and implementation of CCC's Modern Slavery Action Plan. In 2024, the MSWG met twice.

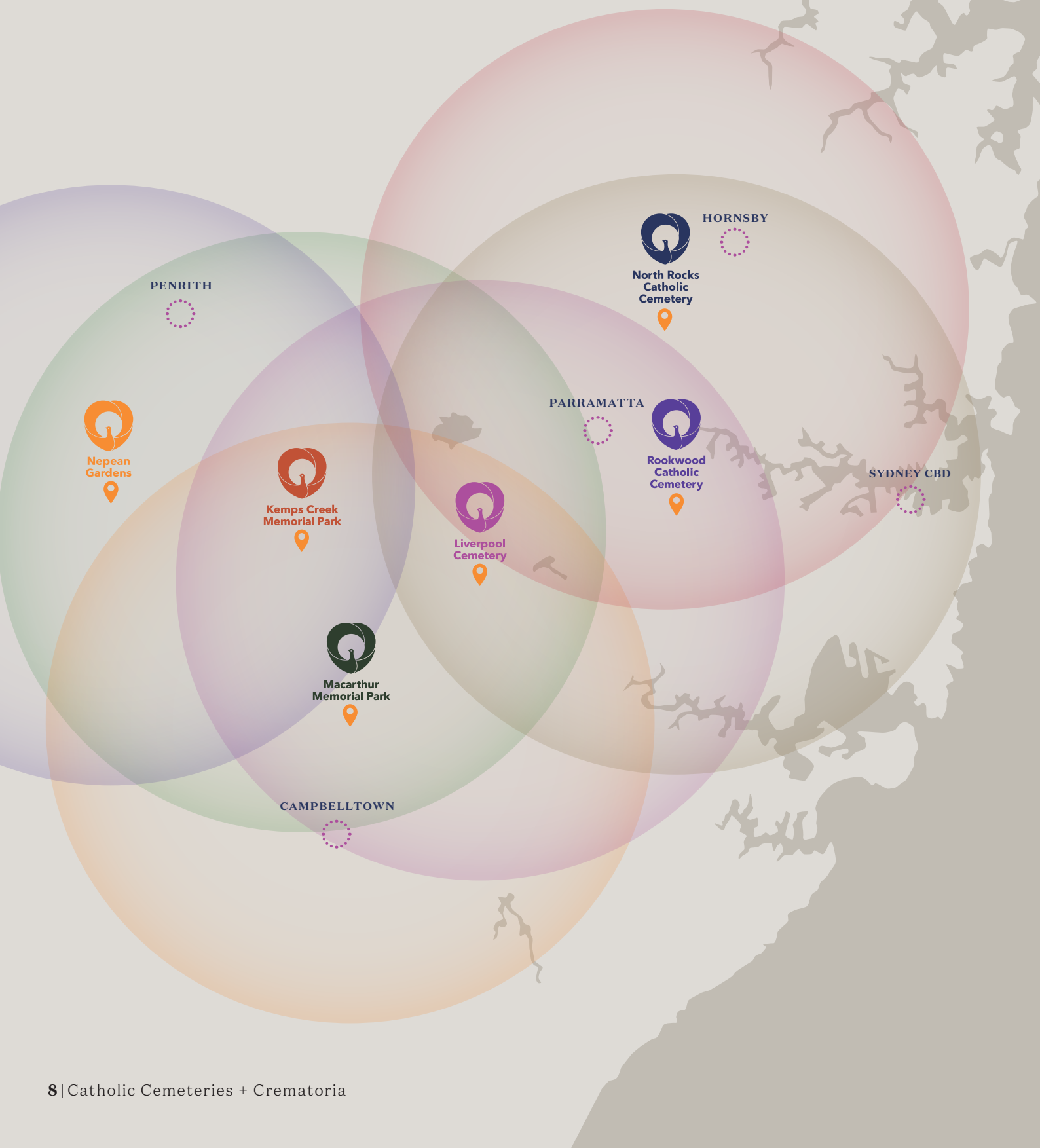
CCC's Modern Slavery risk management activities have the following governance framework in CCC:

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

Our Operations

CCC currently manages three cemeteries in Western Sydney, located in Rookwood, Kemps Creek, and Liverpool. Additionally, construction is underway for Macarthur Memorial Park, scheduled to open in early 2025. CCC also oversees the operations of North Rocks Catholic Cemetery.

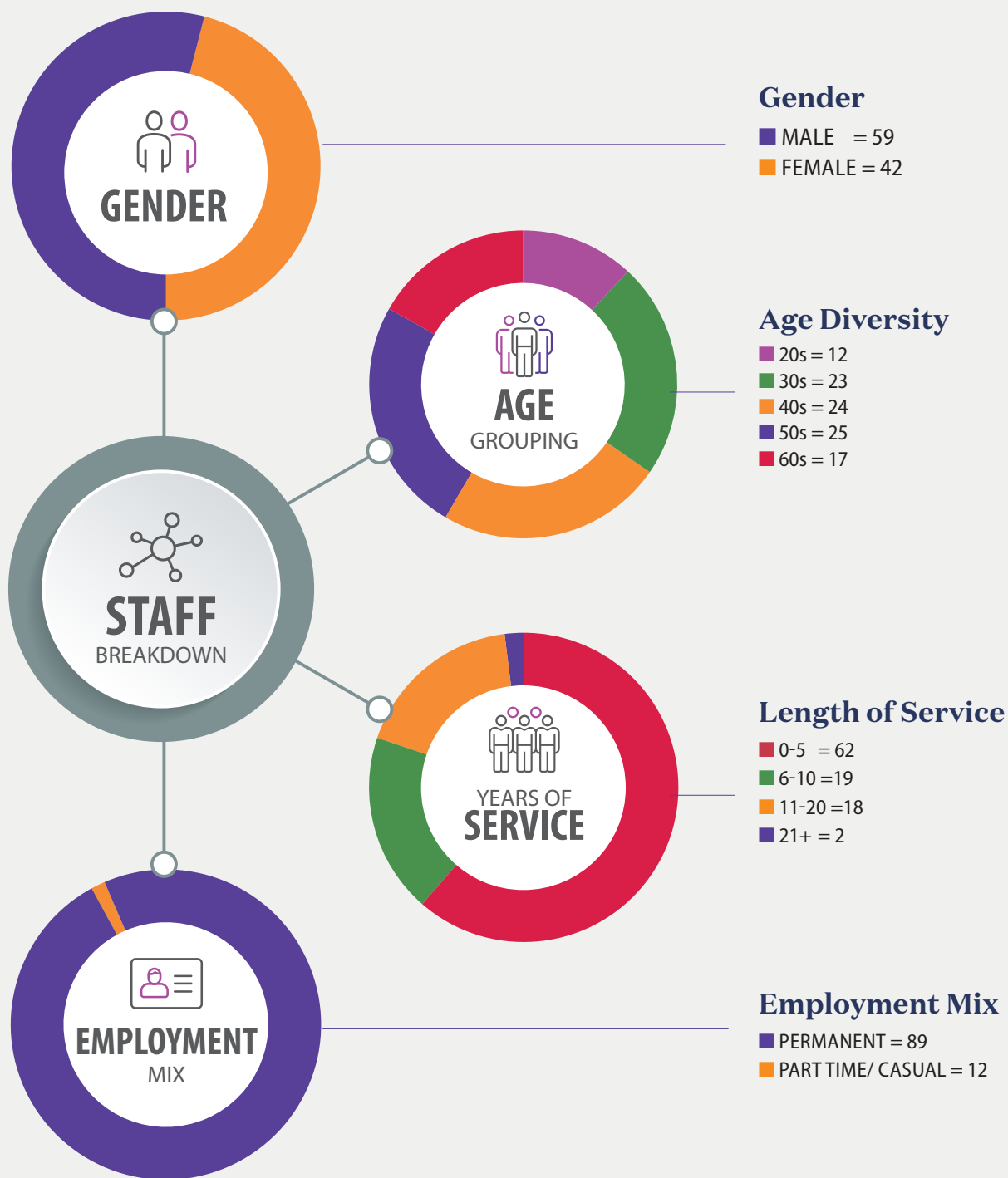
Our Reach



Our Organisation



Our Team



Workforce profile

CCC's supplier relationships consist of a mix of short and long term engagements. For goods procurement, the suppliers typically set contractual terms, whereas service agreements involve a negotiation process. Beyond suppliers, CCC's primary business relationships include partnerships with Community Groups and Funeral Directors. The organisation does not participate in any joint ventures.

The Procurement Strategy was fully implemented on 1 April 2022, with the establishment of a 'centre led' procurement function and the launch of a 'one-stop-shop' procurement portal. A key outcome of this function is the management of "common use" contracts, which cover a significant portion of both operating and capital expenditures. This approach helps mitigate the risk of CCC being inadvertently linked to modern slavery. CCC is focused on building long term partnerships with suppliers while continually exploring alternative sources of supply. Only those suppliers who meet our rigorous standards are appointed.

Our Supply Chains

In the reporting period, CCC purchased over \$62.2 million worth of goods and services, primarily from 241 direct suppliers. Our supplier base includes businesses across various sectors, such as construction, stone masonry, cleaning, security, legal services, landscaping, labour hire, IT consulting, and waste management. The majority of our procurement was sourced from Australian suppliers.

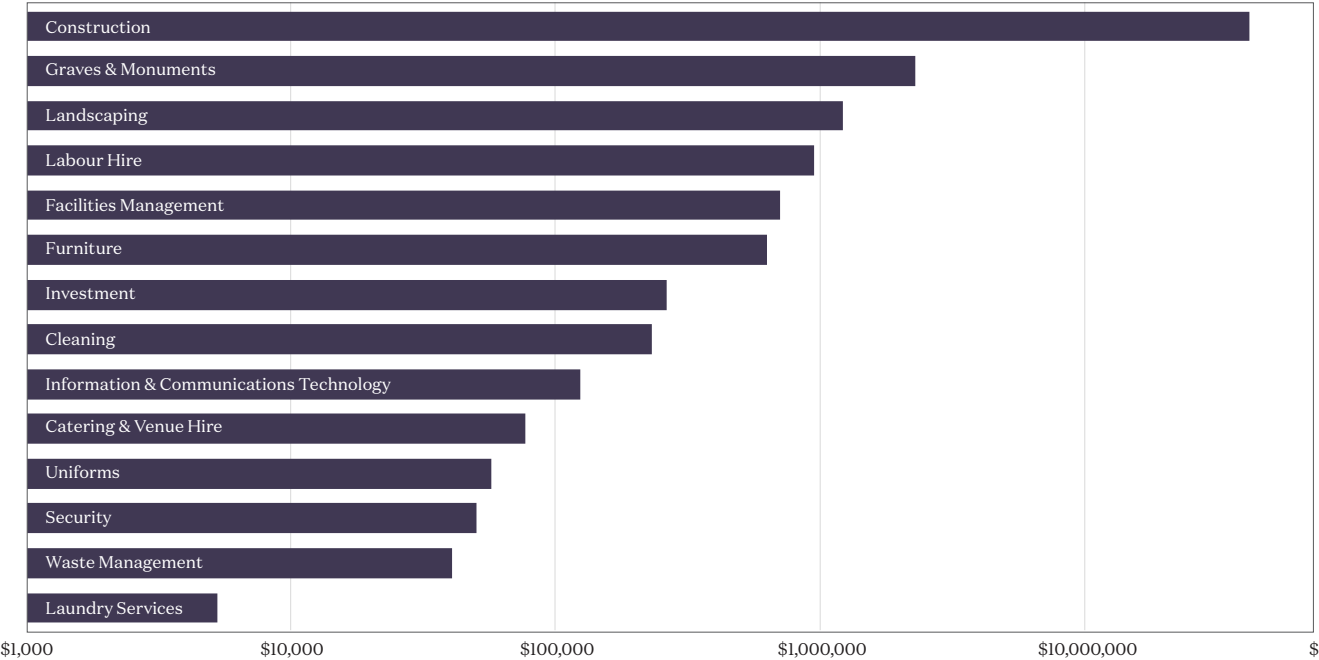
Criteria 3: Modern Slavery risks



During the reporting period, CCC identified the suppliers with the highest potential risk based on the ACAN Category Risk Taxonomy. This analysis served as the foundation for the supplier dashboard below, which offers an overview of the potential modern slavery risks within CCC’s supply chain. It marks the first step in building strong risk management systems.

Construction	\$41,746,199
Graves & Monuments	\$2,292,600
Landscaping	\$1,219,112
Labour Hire	\$946,758
Facilities Management	\$704,365
Furniture	\$630,225
Investment	\$262,784
Cleaning	\$231,640
Information and Communications Technology	\$124,745
Catering & Venue Hire	\$76,820
Uniforms	\$57,204
Security	\$50,592
Waste Management	\$40,748
Laundry Services	\$5,307

Spend on High Risk categories



The Dashboard does not attempt to determine the 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 a risk with materials imported from overseas. “Construction” and “Facilities Management” may represent a risk due to migrant workers from overseas countries.

After reviewing our top 100 suppliers, the graph below highlights 14 potential high risk categories out of 57 suppliers, representing 89% of the top 100 spend.

Risk				
Spend risk (\$)	\$48,389,099	\$503,710	\$5,757,141	\$54,649,950
Supplier risk (No.)	57	6	32	95
Category risk (No.)	14	3	8	25



The 14 potential high risk categories include Construction, Grave & Monuments, Landscaping, Facilities Management, Cleaning, Security, Information and Communications Technology, Investment, Uniforms, Catering & Venue Hire, Waste Management, Labour Hire, Laundry Services, and Furniture.

The primary areas of potential risk are in Construction, Grave & Monuments, Landscaping, Labour Hire, and Facilities Management, which together accounts for the majority of the \$46.9 million spent.

The next largest category of potential risk are Cleaning and Furniture, totaling \$861,000.

CCC is confident that the risk of modern slavery within our internal workforce is low, thanks to a range of policies, systems, and practices in place. These include Human Resource policies designed to ensure that all staff are compensated above award rates based on their role and qualifications. Employment information is securely recorded and managed through our HR Information System and Payroll System, ensuring accurate tracking of staff and their respective employment and pay details.

The key points are:

- Employment - In line with our Recruitment and Selection procedure, hiring decisions are made based on merit, equal employment opportunity, and compliance with relevant Federal and State legislation.
- Pay rates are reviewed annually to ensure they comply with minimum standards.
- Labour hire agencies, including those providing apprentices, are also subject to legislation that ensures compliance with minimum award pay rates for all employees. All agencies are engaged on the understanding that their pay rates align with the relevant CCC instruments, and they provide us with the pay rates for the labour hire personnel they supply.
- Anti-Discrimination is addressed in our Code of Conduct. We value the diversity of our workforce, and as a result, we employ individuals from a wide range of backgrounds.
- The protection of individuals who report illegal or improper conduct within CCC is outlined in our Whistleblower Policy.

Criteria 4:

Actions taken to assess and address risk

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In 2024, the focus was on continually raising awareness among employees and the community, monitoring risks, and taking ongoing procurement actions to address modern slavery.

Category Summary

Management Systems

CCC has established policies, processes, and an action plan to address modern slavery.

Our Board recognises the risks associated with modern slavery, and the Leadership team ensures due diligence is exercised while overseeing the effective implementation, review, and improvement of our risk management system. We have actions and controls in place to identify, manage, and report on modern slavery risks, incidents, and corrective actions. Our governance framework is well defined, and we have a dedicated team focused on driving efforts to mitigate modern slavery.

Risk Management

The CCC risk management framework is actively utilised and includes a dynamic feedback loop to integrate new insights. We use Risk Wizard software to capture incidents, assess their severity, map out actions, and track progress in mitigating risks. We regularly engage with our operational staff to identify additional concerns beyond wage compliance. The system is designed to monitor risks, allowing us to proactively manage and prioritise areas where our resources are most needed.

Procurement and Supply Chain

Our procurement framework is actively utilised and includes a dynamic feedback loop that integrates learnings to enhance decision-

making and risk management. Modern slavery considerations are incorporated into our contract management and tender process, influencing decisions when awarding tenders. We investigate any instances or suppliers associated with adverse information. However, performance is only regularly monitored in terms of quality and delivery issues.

We have advanced our supplier engagement strategy by communicating our stance on modern slavery to all suppliers and conduct surveys with potentially highrisk suppliers to assess their awareness and actions regarding modern slavery.

Additionally, we utilise Supplier Ethical Data Exchange (SEDEX) to identify risks within the supply chains of these potentially high-risk suppliers.

Stakeholders

CCC has communicated our commitments and values to stakeholders, establishing accountability for driving improvements on this issue. Through our whistleblower policy (for staff and labour hire contractors) and complaints policy (for customers), we provide an active, anonymous, and efficient grievance mechanism. However, this mechanism does not currently extend to workers within our supply chains.

Grievance Mechanism

CCC has developed a Whistleblower Policy and Grievance Procedure to foster a culture of honesty and ethical behavior by encouraging stakeholders to report any actual or suspected unethical, illegal, corrupt, or fraudulent practices within CCC's operations. CCC is enhancing the ability of its direct employees and stakeholders to identify and respond to signs of poor labour practices, unsafe working conditions, and modern slavery in its operations and supply chains, and to raise these concerns with management. In 2024, 91 staff completed Respect at work training, which includes the Grievance policy.

Remediation

CCC is committed to ensuring appropriate and timely remedies for individuals impacted by modern slavery, in line with the United Nations Guiding Principles on Business and Human Rights, the Commonwealth Modern Slavery Act 2018 – Guidance for Reporting Entities, relevant Australian laws, and best practice guidelines on informed consent for those affected. This commitment also involves taking actions or cooperating to address harm and the root causes of modern slavery, with the goal of mitigating future risks if CCC is found to have caused or contributed to modern slavery.

If CCC is directly linked to modern slavery through a business relationship, we are dedicated to working with the responsible entity to ensure remediation and prevent recurrence.

Our Investments

CCC aims to invest responsibly as a committed community member, ensuring that its investments align with its specific mission, the values of the Catholic Church, and the broader context in which the Trust operates.

The Ethical Statement in the CCC Investment Policy requires investment managers of managed funds to monitor the portfolio in accordance with globally accepted standards on corporate sustainability, specifically in the areas of Human Rights, Labour, Environment, and Corruption.

Additionally, on a quarterly basis, we receive a proxy voting report from our Investment Advisor, currently Russell Investments, along with a report identifying companies with primary business activities that engage in unethical or undesirable practices.

Russell Investments is a member of Investors Against Slavery and Trafficking (www.iastapac.org)

Modern Slavery Action Plan

Achieved in 2020-2024	Plan for 2025
Achieved in 2020-2024 › Established the Modern Slavery Policy. › 2020 - 2023 Annual Statements are published on CCC website & Procurement Portal. › Incorporated Modern Slavery risk into CCC's operations and supply chain. › Established a Modern Slavery Working Group (MSWG). › Promoted employees' MS awareness via Newsletters. › Implemented anti-slavery clauses in Purchase Orders. › Included Modern Slavery requirements in tendering processes. › Surveyed 60 high-risk suppliers to understand their awareness and approach. › CCC continued to participate in the Australian Catholic Anti-Slavery Network (ACAN) › MS awareness Presentation to all staff in Townhall meeting.	› Prepare 2024 Modern Slavery Statement. › Review Modern Slavery Risk annually. › Resurvey of potential high-risk suppliers to note progress via ACAN. › Incorporate Modern slavery training and awareness into recruitment and induction processes. › Continuously promotes employees' MS awareness. › Utilise social media to promote MS awareness among communities. › Renew ACAN participation

Criteria 5:

Assessing Effectiveness



CCC effective measures are outlined in the below table and demonstrate improvement since the previous reporting period. These measures include, but are not limited to:

- › Five Modern Slavery newsletters were distributed to all Staff.
- › A Modern Slavery awareness presentation was delivered to all staff during the Townhall meeting.
- › 466 Purchase Orders were issued, each incorporating an anti-slavery clause in terms and conditions.
- › Details of 928 suppliers were shared with ACAN & Sedex to assess their awareness and approach to Modern Slavery.
- › CCC utilised Sedex to foster more socially and environmentally sustainable businesses and supply chains.

Catholic Cemeteries and Crematoria Trust	ACTIVITY	2023	2024
INTERNAL / STAFF	Hours spent on modern slavery activities	120	210
	Individual staff completed e-learning	-	0
	E-learning modules completed	25	0
EXTERNAL / SUPPLIER ENGAGEMENT	Total number of suppliers	622	928
	Number of suppliers across high-risk categories	35	39
	Purchase orders include modern slavery clause	582	466
	Number of ACAN Supplier Surveys completed	75	128
	Supplier staff attending capacity building webinars	26	12
	Invited to join Sedex	12	30
	Joined Sedex	4	38
	Sedex SAQ completed	2	7
	Social audits	1	0
	Corrective actions	0	0
DOMUS 8.7 EXTERNAL REFERRALS	Contacts made via worker voice / grievance mechanism	0	0
	Referrals for advice and assistance	0	0
	Individuals identified or referred for modern slavery assessment	0	0
	Individuals with modern slavery cases remediated	0	0

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: Consultation with Owned or Controlled Entities



No other relevant information to report.



**Catholic
Cemeteries +
Crematoria**

Contact Us

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
Phone: 1300 086 689
Email: info@mmpark.com.au
www.mmpark.com.au

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