





- 04 Mercy Education shall comply with all relevant laws and regulations regarding recruitment, remuneration, working conditions and freedom of association
- 05 Purchasing decisions of Mercy Education shall not be based on price alone. Ethical considerations. This includes consideration of worker living wage mechanisms and the ethical recruitment of workers
- 06 Mercy Education will continue to support its suppliers and business partners to assess and address modern slavery risks and take action needed to improve transparency, traceability and accountability for modern slavery practice and impact in its collective supply chains

Actions to prevent and manage modern slavery risk.

Mercy Education has a Risk Management programme in place for modern slavery which is underpinned by ethical business practices and considers all stakeholders (including people who are at-risk of and/or experience modern slavery practices). Key elements of the program are summarised in Appendix 2.

The following actions are required of workers, business partners and suppliers:

*Board, Management, employees, contractors, and suppliers*

- 07 The Board has overall responsibility for ensuring that this policy and its implementation complies with relevant Catholic social teachings, legal, and ethical obligations  
The Board is trained in the principles and risks of modern slavery, its implications globally, and for Mercy Education
- 08 The Chief Executive has ultimate responsibility for managing modern slavery risk within Mercy Education and its individual colleges
- 09 Management at the National Office and in individual colleges are responsible for ensuring workers are aware of this policy and delegated representatives are provided with regular training and sufficient resources to allow for its implementation
- 10 Each College is responsible for appointing and training a Modern Slavery Liaison Officer (MSLO) to assist with the promotion of this policy and the implementation of modern slavery principles
- 11 Anyone working for Mercy Education, or acting on its behalf, is expected to apply the following measures:
  - a) ensure that the identification, prevention, management and mitigation of modern slavery risk is a core responsibility of all workers
  - b) business operations or relationships that knowingly support, facilitate or encourage worker exploitation or modern slavery practices are strictly forbidden
  - c) any actual or suspected activity that could breach this policy must be reported to the National Office immediately





*Debt bondage (or bonded labour)*

Debt bondage is the most common form of slavery. This occurs when a person is forced to work to pay off an excessive debt unfairly imposed by a recruitment agent or employer. The person works for little or no pay, with no control over the management of their debt.

Examples of debt bondage are recruitment fees, travel costs, visas, work materials or scheec14i EMT01 664.3 Tm



1. A *policy* which outlines its commitment to prevent and manage modern slavery within its operations, business partnerships and supply chain
2. *Communication* of this policy and related program initiatives to employees, business partners and supply chains
3. *Assessment of modern slavery risks* within its Risk Management Framework to address all business operations and supply chains