



Modern Slavery Statement 2025

For Recommendation

Purpose

To request that the Board review, and if found appropriate, approve the Anglican Schools Corporation (ASC) Modern Slavery Statement 2025.

Background

The Commonwealth Modern Slavery Act 2018 (the Act) established Australia's national Modern Slavery Reporting requirement. Under the Act, commercial and not-for-profit entities with annual consolidated revenue of at least \$100 million must publish annual Modern Slavery statements. The Act sets out seven mandatory criteria that must be included in Modern Slavery Statements.

ASC is required to submit its Modern Slavery Statement to the Australian Government Department of Home Affairs Border Force by 30 June 2026 in relation to the 2025 Calendar year (that is, within six months of the Corporation's Reporting period). The statement will be published on an online central register.

The term Modern Slavery is used to describe situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom. Modern Slavery is only used to describe serious exploitation. It does not include practices like substandard working conditions or underpayment of workers.

ASC's Approach to Modern Slavery Risk Management

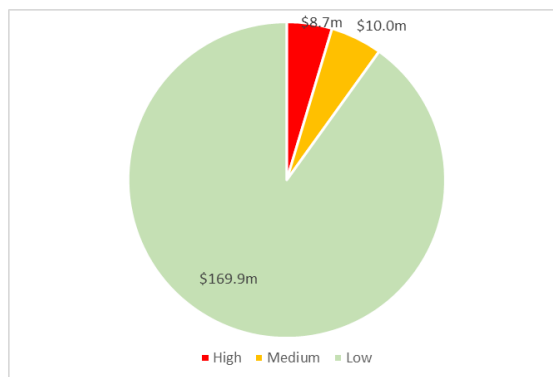
ASC has taken a measured approach to understanding risks within our supply chain as part of a broader initiative to improve procurement practice. The intent is to improve our understanding and response to modern slavery risks over time and demonstrate progress through our annual Modern Slavery Statements.

Our supply chain includes a range of higher-risk industries, such as capital works construction and maintenance, Information Technology equipment, cleaning, school supplies, food and catering supplies, and furniture supplies and medium-risk industries such as financial services, insurance, utilities, consulting, and bus lines. In 2024 ASC adopted the Office of the NSW Anti-Slavery Commissioner's inherent risk rating guidance and continued using this methodology in 2025 to assess supplier risk profiles.

The 2025 risk assessment focused on ASC suppliers with annual spend in 2024 exceeding \$100,000. Over 2021–2025, ASC has also used modern slavery surveys to understand maturity of **36 suppliers** (including 6 suppliers in 2025). Surveys include questions on policies, training, employment practices, governance, and organisational visibility of modern slavery.

Based on the risk assessments and survey results:

Figure 1 – Risk profile of ASC 2024 supplier spend



- 20 suppliers were assessed as inherently “high risk”[^], primarily in food supplies, cleaning, and ICT equipment – eight of these suppliers (with spend of \$4.7m) have submitted surveys across 2021 to 2025, with an average maturity score of 6.1 (high levels of maturity)
- 8 suppliers were assessed as inherently “medium risk”[^], of which five have submitted surveys, with an average maturity score of 2.0 (spend of \$0.7m) (low levels of maturity)

- 208 suppliers (\$170m) were assessed as inherently “low risk”[^], including four tier one building contractors (\$79m) and 61 other building services industry suppliers (\$40m). 15 suppliers (with a spend of \$45.4m) have been surveyed with an average maturity score of 4.2 (moderate maturity)
- A further six suppliers have been surveyed in 2021 to 2023 but did not transact with ASC in 2024.

[^] Inherent risk ratings based on the Office of the NSW Anti-Slavery Commissioner’s inherent risk rating guidance

Supplier capability and focus on modern slavery varies across industries (Figure 2). The building sector is the least mature (based on 2021 survey data from three tier one building contractors), although the Anti-Slavery Commissioner has rated tier one building contractors in Australia as inherently lower risk.

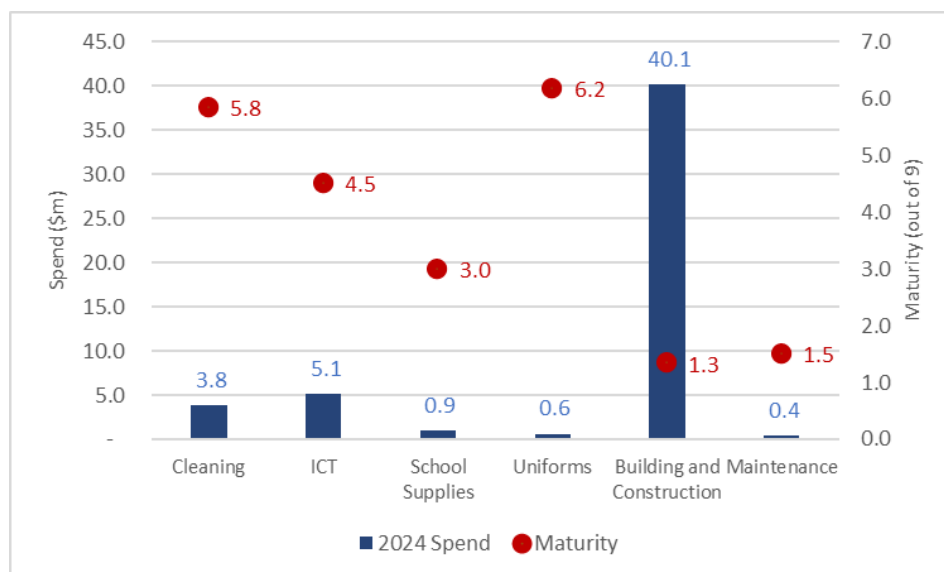


Figure 2 – Survey Results by Industry (2021 to 2025). Average maturity scores only include surveyed suppliers who transacted with ASC in 2024

Creating awareness in our school community is also an important step in addressing modern slavery risks. In 2025 we continued to promote modern slavery awareness training modules for key staff members across schools and Group Office with two training courses available for staff. This training has been sourced from the Australian Border Force Modern Slavery e-learning resources. Figure 3 summarises completion across TASC.

Course	Group Office	Schools	Total
Modern Slavery in Procurement	24	36	60
Identifying modern slavery risks	5	30	35
Total	29	66	95
<i>Training mainly completed by:</i>			
	<i>Business partners and ICT staff</i>	<i>Business Managers, Risk and Compliance Officers</i>	

Figure 3 – Modern Slavery training summary

Every school has had at least one person complete one modern slavery course except Orange Anglican Grammar school. Ultimately, we should aim to train all persons with procurement authority in Modern Slavery as part of broader procurement capability framework. Using high level assumptions, we estimate that 50% - 60% of persons with procurement decision making authority have received training.

Overall, as stated in the ASC Modern Slavery statement, the risk of modern slavery in our supply chain is assessed as low, and ASC continues to take a measured approach to addressing this risk, with other higher risk areas (such as child protection) receiving greater attention.

Looking ahead we will continue to survey suppliers, including re-surveying members of the building and construction sector and new suppliers deemed to be operating in high risks industries. We will also continue to undertake training of key staff involved in procurement.

2025 Modern Slavery Statement

The draft ASC Modern Slavery Statement for 2025 is provided at Attachment 1. Substantive changes to the prior year are highlighted in yellow. A “snapshot” that was previously attached to the statement has been removed as it provided no additional information for users. The statement covers the seven mandatory reporting criteria in the Act.

Recommendation

The Governance and Risk Committee considered the Modern Slavery Statement at their June 2026 meeting. The Committee discussed ASC’s measured approach being commensurate with the assessed level of risk and other higher risk priorities. The Committee resolved to recommend the Modern Slavery Statement (Attachment 1) to the Board for approval so that it can be submitted to the Australian Government, Department of Home Affairs Border Force.

Draft resolution for consideration

The Board resolved to approve the Anglican Schools Corporation Modern Slavery Statement 2025 and further resolved that the Statement be signed by the Corporation Chairman on behalf of the Board and submitted to the Department of Home Affairs Border Force.

Attachments

1. Modern Slavery Statement 2025

Prepared by:	Todd Dewey, Manager Risk and Compliance	Date:	6 May 2026
Reviewed by:	Nicole Grantham, Chief Risk Officer	Date:	17 June 2026

Attachment 1

The Anglican Schools Corporation

Modern Slavery Act Statement 2025

This statement, made pursuant to the Commonwealth Australian Modern Slavery Act 2018, sets out the actions taken by The Anglican Schools Corporation (referred to as “The Corporation”, “us”, “we” or “our”) to address modern slavery and human trafficking risks in our business and supply chain for the year ending 31 December 2025.

The Corporation is committed to contributing to the eradication of modern slavery and human trafficking by:

- acting ethically and with integrity and transparency in our business dealings and relationships; and
- implementing processes to minimise the occurrence of modern slavery and human trafficking either within our own operations or in any of its supply chains.

In 2025 the Corporation continued the operation of cross-functional teams to drive our response. The Corporation mapped key aspects of our supply chain and completed a risk assessment of our major suppliers in order to better understand our supplier base. In support of the risk assessment, the Corporation also extended deployment of a modern slavery questionnaire across major providers in the school supplies sector. The responses from the questionnaire formed an important part of the Corporation's modern slavery risk review.

This document sets out our actions and plans for the way in which we approach risks of modern slavery and human trafficking in our supply chain.

About Us

The Corporation is an organisation established by the Anglican Church Diocese of Sydney to provide a Christian education for the communities we serve.

Each of our schools' nurtures and educates young people in accordance with the doctrines, tenets, beliefs and teachings of the Anglican Church Diocese of Sydney.

The Vision of the Corporation is: 'Serving Christ by equipping students for His world' and our Mission is: 'To provide affordable quality Christian education'.

Under our Mission we have five objectives:

- to provide high quality education within a Christian worldview that is shaped by the Bible,
- to communicate in word and deed the gospel of Jesus Christ to students, staff, parents and the wider community,

- to provide education that is financially accessible to local communities,
- to operate the Corporation efficiently and safely, and
- to grow the Corporation.

Organisational Structure

The Anglican Schools Corporation (ABN 63 544 529 806) was originally established as an unincorporated body by the Synod of the Anglican Church Diocese of Sydney in 1947. The Corporation was incorporated as a body corporate pursuant to the Anglican Church of Australia (Bodies Corporate) Act 1938 on 2 April 1965.

The governing constitution of the Corporation is an ordinance of the Synod of the Anglican Church Diocese of Sydney or the Synod's Standing Committee.

The Corporation is governed by a Board of up to 13 people, nine of whom are elected by the Synod of the Anglican Church Diocese of Sydney, two are appointed by the Archbishop of Sydney and two appointed by the Board itself.

The Chairman is Mr Philip Bell OAM.

The Chief Executive Officer of the Corporation is Mr Peter Fowler. The Chief Executive Officer is responsible to the Board for driving the implementation of the Corporation's Strategic Plan, for the implementation of the policies and decisions of the Board and for the general administration and daily operation of the Corporation. Under the direct responsibility of the Chief Executive Officer is the Corporation's Group Office located in Hurstville, NSW.

The Board establishes School Councils to govern the operation of one or more Corporation schools. A School Council consists of a Chair and at least four and up to nine additional persons appointed by the Board. The primary role and responsibility of a School Council is to promote the Objects of the Corporation by ensuring that each school for which it has governance responsibility operates in a manner that:

- Upholds the Corporation's Objects,
- Supports the Corporation's Philosophy of Education,
- Implements the School's strategic plan and policies that are consistent with the Corporation's Strategic Plan and Policies; and
- Develops the individual character of the school in the context of its local environment and in a relationship of interdependence with the Corporation.

Each school is led by a Principal who is responsible to the Board through the School Council for the implementation of the School's strategic plan; the implementation of the Board's and the School Council's policies and decisions; and the general administration and daily operation of the School.

Operations

The Corporation's operations include delivery of high-quality education with a Christian worldview to boys and girls from Pre-K to Year 12. Our operations are entirely based in NSW, across 18 schools, supported by a centralised Group Office function located in Hurstville, Sydney. These schools provide

education to approximately 18,443 students and employ approximately 2,050 full-time equivalent staff.

In 2025 the Corporation recorded gross annual revenue of \$523.3m and a total procurement spend of approximately \$104.7m on goods and services (excluding salaries and wages) and \$92.1m on Capital expenditure to support our operations.

Risks of Modern Slavery in Operations and Supply Chain

The Corporation recognises that our Corporate social responsibilities fall in both our own direct activities and those of our supply chain.

Our operations

The Corporation is confident that the risks of modern slavery and human trafficking in our direct operations is very low due to the strict regulations in the education sector and employment laws that the Corporation is required to comply with.

Our Supply Chain

The majority of our direct suppliers are based in Australia.

During 2025 the Corporation again completed its supplier categorisation, identifying high expenditure and high-risk categories. The Corporation utilised the Office of the NSW Anti-slavery Commissioner's inherent risk identification tool as part of the 2024 and 2025 supplier risk assessment and categorisation process.

A supplier database was expanded, and risks were assessed against:

- the industry in which the supplier operates,
- the category of the product or service being procured,
- the geographic location of the supplier, including known import or export locations; and
- the entity, including whether the supplier has any public evidence of compliance with human rights and modern slavery laws (e.g. a published Modern Slavery Statement or Human Rights Policy).

Categories identified as higher risk included:

- Cleaning
- Building, construction and maintenance
- Food and catering services
- ICT hardware
- School uniforms
- School supplies
- Furniture

The Corporation's largest suppliers are from the building, construction and maintenance sector. Building, construction and maintenance suppliers include builders, architects, consultants, engineers, plumbers, electricians and air-conditioning technicians. The inherent modern slavery risk for suppliers engaged by ASC was assessed as low to medium.

Commencing in 2021, the Corporation is progressively deploying a Modern Slavery questionnaire across higher-risk industries to better understand suppliers' modern slavery risk awareness and risk management practices,. The questionnaire is designed to:

- support the identification of modern slavery risks in these segments of our supply chain;
- commence working with suppliers to address these risks;
- improve transparency and understanding; and
- allow both parties to increase awareness of risk factors in the supply chain.

During 2025 we engaged with providers of school supplies. The outcomes from the questionnaire during 2025 contributed to our risk assessment and indicated a good level of awareness of modern slavery risks amongst the Corporation's high-risk suppliers in this industry.

During 2024 and 2025 the Corporation updated its standard form contracts to include an acknowledgement of Modern Slavery Legislation and a commitment from suppliers to work with the Corporation in regard to minimising the impact within their supply chains.

In total 90 on-line Modern Slavery training courses have been completed by Corporation staff across Group Office and all 18 Corporation schools, including 20 courses completed during 2025.

Our Whistleblower Policy allows for anonymous reporting of modern slavery and human trafficking incidents either directly to the Corporation or through the "Your Call" whistleblowing service <https://www.yourcall.com.au/report>.

Improvement initiatives planned for 2026 include:

- ongoing risk assessment of key suppliers by industry category and geographic location;
- continuing to raise awareness of modern slavery and human trafficking across additional high-risk industries in our supply chain and amongst a broader cross section of our management and staff through deployment of additional questionnaires, learning and professional development;
- Continuing to work towards improvements in our procurement practices and workflows; and
- updating the Corporation's procurement policy to incorporate ethical procurement practices.

How we assess the effectiveness of our actions

Tracking the impact of our initiatives to mitigate modern slavery risks is a key part of our response to Modern Slavery. This monitoring and assessment will assist us to understand what works and where further action is required. During the year we measured the effectiveness of our actions through the number of staff trained by schools, the number of suppliers risk assessed and the survey results.

Consultation with any entities owned or controlled

The Anglican Schools Corporation controls Capstone Finance Limited (CFL), although the Corporation is not a member of this entity. Control arises because the directors of CFL are Members of Anglican Schools Corporation who have been appointed as directors of the entity by the Board of Anglican Schools Corporation.

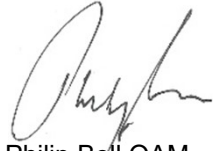
This statement has been produced in consultation and reviewed by the CFL Directors who are also Directors of the Corporation.

This Statement was approved by the Board of the Anglican Schools Corporation on 30 June 2026.

Any other relevant information

Nil

Signed by:



Philip Bell OAM

Corporation Chairman

Date:

19 May 2026