



# Modern Slavery Statement

2024

# Introduction

This is Methodist Ladies' College's (MLC) first Modern Slavery Statement submitted pursuant to the Modern Slavery Act 2018 (Cth) (the Act). The report covers the period from 1 January 2024 to 31 December 2024.

The purpose of this statement is to address the criteria in Section 16 of the Act, including describing the current modern slavery risks identified in our operations and supply chains and outlining the approach being taken by the College to ensure we have a framework of policies and practices to assess and address those risks.

## About MLC

Founded in 1882, MLC is Melbourne's leading non-denominational independent day and boarding girls' school with a coeducational Early Learning Centre, committed to excellence and innovation in education.

### Our Vision

*An MLC education inspires our students to be the citizens the world needs.*

MLC students develop the skills, values and confidence to embrace the challenges and opportunities at school and beyond, and to contribute meaningfully to society.

### Our Mission

*MLC, as a leading girls' school, develops and nurtures a community of independent, resilient, ambitious learners by providing an unmatched breadth of integrated learning and wellbeing experiences and environments.*

MLC's unmatched breadth of integrated learning and wellbeing experiences and environments aim to inspire students to find and nurture their individual interests and talents, forge their paths, and realise their full potential.

Our commitment to excellence and innovation in education, combined with our scale, diversity, and resources, offers enriched learning opportunities. These opportunities support students in becoming independent, resilient, and ambitious learners by allowing them to explore everything that interests, challenges, and motivates them.

### Our Values

Our values articulate what we stand for and aspire to, guiding the culture we foster and the behaviours we expect of everyone within our community.



# Structure and Operations

Methodist Ladies' College (ABN 55 006 036 979) is a Company limited by guarantee which was incorporated in 1982. The MLC Constitution is the primary document that governs the College. MLC is registered as a charity with the Australian Charities and Not-for-profits Committee and is governed by a board of directors comprising of non-executive volunteers and the Principal.

The MLC Board understand the reporting and compliance requirements under the Modern Slavery Act (Cth).

The principal activity of the school operations is the provision of early learning, primary and secondary education. The College operates a boarding house and two outdoor education campuses.

The main campus of the College, and registered office, is 207 Barkers Road, Kew, Victoria. In 2024 the College had 2,126 students and 413 full-time equivalent staff.

MLC has long-term arrangements with key suppliers, ensuring stability and consistency in procurement. These arrangements are structured through formal contracts, which define the terms of engagement, quality expectations and service levels.

## Risk of Modern Slavery in our Supply Chains

In assessing the risk of modern slavery in our supply chains, consideration was given to the total spend/contract value with a supplier, product/service category, geographic location and industries where suppliers may engage a transient or low-skilled workforce.

Based on the above factors, we identify that modern slavery risk may exist in the following areas:

Supply Chain	Potential Modern Slavery Risk
Construction	Use of sub-contractors and labour hire increases the risk of exploitation Vulnerability of migrant and low-skilled workers to underpayment, poor working conditions and debt bondage Risk of forced child labour in the sourcing of raw materials such as timber, steel and bricks from high-risk countries
Catering	Reliance on low-paid, casual or migrant workers who may face wage theft, excessive hours or poor working conditions Risk of forced labour or child labour in the agricultural supply chain (e.g. coffee, cocoa and fresh produce) Exploitation risks in food processing and packaging in overseas supply chains
Cleaning	Workers often from vulnerable migrant backgrounds, may experience underpayment, excessive hours and debt bondage
Grounds and building maintenance	Use of temporary or subcontracted workers, increasing the risk of underpayment or exploitative conditions Potential exposure to forced labour in the sourcing of some materials from high-risk regions
Security Services	High reliance on migrant and casual workers, who may be vulnerable to wage theft and excessive working hours. Risks associated with labour hire and sub-contracting making oversight difficult.

Supply Chain	Potential Modern Slavery Risk
ICT	<p>High risk of forced and child labour in the extraction of raw materials (e.g. cobalt, lithium, rare earth minerals) used in electronics manufacturing</p> <p>Factories producing ICT hardware may have exploitative working conditions, including excessive overtime and unfair wages.</p>
Uniforms	<p>Textile and garment manufacturing is a high risk industry, with forced and child labour reported in cotton farming and textile production.</p> <p>High risk that workers may experience poor conditions, low wages and forced overtime in overseas factories.</p> <p>Supply chains may involve unethical subcontracting, making transparency and accountability difficult.</p>

## Assessing and Addressing Risk

MLC's approach to the assessment of and response to modern slavery risks has included the following:

### 1. Identification and Risk Assessment (Initial Review)

- Initiated a risk assessment of suppliers, considering modern slavery risk factors such as country of operation, sector-specific risks, and labour practices.
- Incorporation of modern slavery clauses in major construction contracts.

### 2. Review of Policies and Procedures

- Developed an overarching Modern Slavery Policy to outline the College's commitment to preventing modern slavery.
- Commenced review of procurement policies and procedures to ensure alignment with MLC's Modern Slavery Policy.
- Provided education and training for relevant staff regarding modern slavery.

### 3. Supplier Engagement

- Developed a Supplier Code of Conduct to establish clear expectations regarding fair wages, safe working conditions and freedom from forced labour.
- Assessed major construction contract against modern slavery requirements.
- Commenced assessing new suppliers against modern slavery requirements.

### 4. Monitoring, Control and Ongoing Improvement

- Developed an action plan for future actions to improve the College's response to modern slavery risks.
- Commenced ongoing reporting to the Finance, Audit and Risk Management Committee of the MLC Board

In 2025, MLC plans to undertake the following activities:

- Ongoing policy review and process improvement.
- Seek to further review and evaluate supply chains, including enhanced supplier screening through the use of structured questionnaires.
- Review the College's grievance mechanisms for workers in our supply chain to enable the reporting of modern slavery concerns.



# Effectiveness Assessment

As this is MLC's first Modern Slavery Statement, we acknowledge that our ability to measure the effectiveness of our actions is currently limited.

However, we are committed to continuously improving our approach to identifying, mitigating, and addressing modern slavery risks in our operations and supply chains

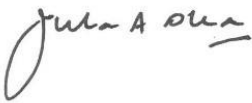
# Consultation

As MLC does not own or control other entities, there was no requirement for consultation with related entities in the preparation of this Modern Slavery Statement.

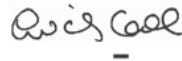
# Approval

This Modern Slavery Statement was approved by the MLC Board on 19 June 2025.

## Signed



Julia Shea  
**Principal**



Lucia Cade  
**Chair of the MLC Board**