St Philip's Christian Education
FOR THE WHOLE OF LIFE

SPCEF CHRISTIAN EDUCATION FOUNDATION LTD

Modern Slavery *Statement*

2025

1 JANUARY 2025 - 31 DECEMBER 2025

SPCEF's Structure & Operations

St. Philip's Christian Education Foundation Ltd (ACN 002 919 584) ("SPCEF") delivers educational services via early learning centres, primary and secondary schools as well as tertiary education.
SPCEF is structured as an Australian public company, limited by guarantee, and registered with the Australian Charities and Not-for-profits Commission. Its registered office is:

SPCEF Christian College

30 Bridge Street

Waratah NSW 2298

From humble beginnings in 1982, the SPCEF group today consist of four K-12 co-ed colleges, six early learning centres, four special alternative learning school campuses, two young parents' college campuses, a tertiary training institution, an outside of school hours academy and an Aboriginal school. With 4,500 students and 1,296 staff, the SPCEF group leads the way in Whole of Life education across the Newcastle, Central Coast and Hunter Regions in New South Wales, Australia.

Over four decades, we have continued to challenge ourselves to explore and create better ways forward in education and to equip students with holistic foundations, embedded in Christian values. Our policies and practices adhere to national and state Work Health & Safety and Workers Compensation regulations, we have processes in place to ensure that the awards and enterprise agreements are consistently honoured. We do not directly hire overseas workers.

Our Board of Directors ("the Board") is responsible for the governance of SPCEF. The Board, while retaining ultimate responsibility, may delegate responsibilities to the CEO, Deputy CEO, CFO, COO, Principals or Heads of Entities, sub-committees or other person or persons as it sees fit. Along with the authority to delegate, the Board holds a responsibility to ensure that all delegations are carried out in accordance with statutory and common law requirements, as well as the organisation's internal policies.

This Modern Slavery Statement was **approved by the Board** on 25 June 2026 on behalf of all SPECF entities. **All of the SPCEF entities have been consulted in relation to the preparation and contents of this statement.**

Signed by Graeme Irwin
Chief Executive Officer & Board Member
26 June, 2026

Our Group *Structure*

Central Office

CENTRAL OFFICE, BOARD & BOARD GROUP COMMITTEES

EARLY & EXTENDED EDUCATION

- Narnia Early Learning – FOR THE WHOLE OF LIFE
- Saints Academy – FOR THE WHOLE OF LIFE

K-12 COLLEGES

- St Philip's Christian College – FOR THE WHOLE OF LIFE

TAILORED EDUCATION

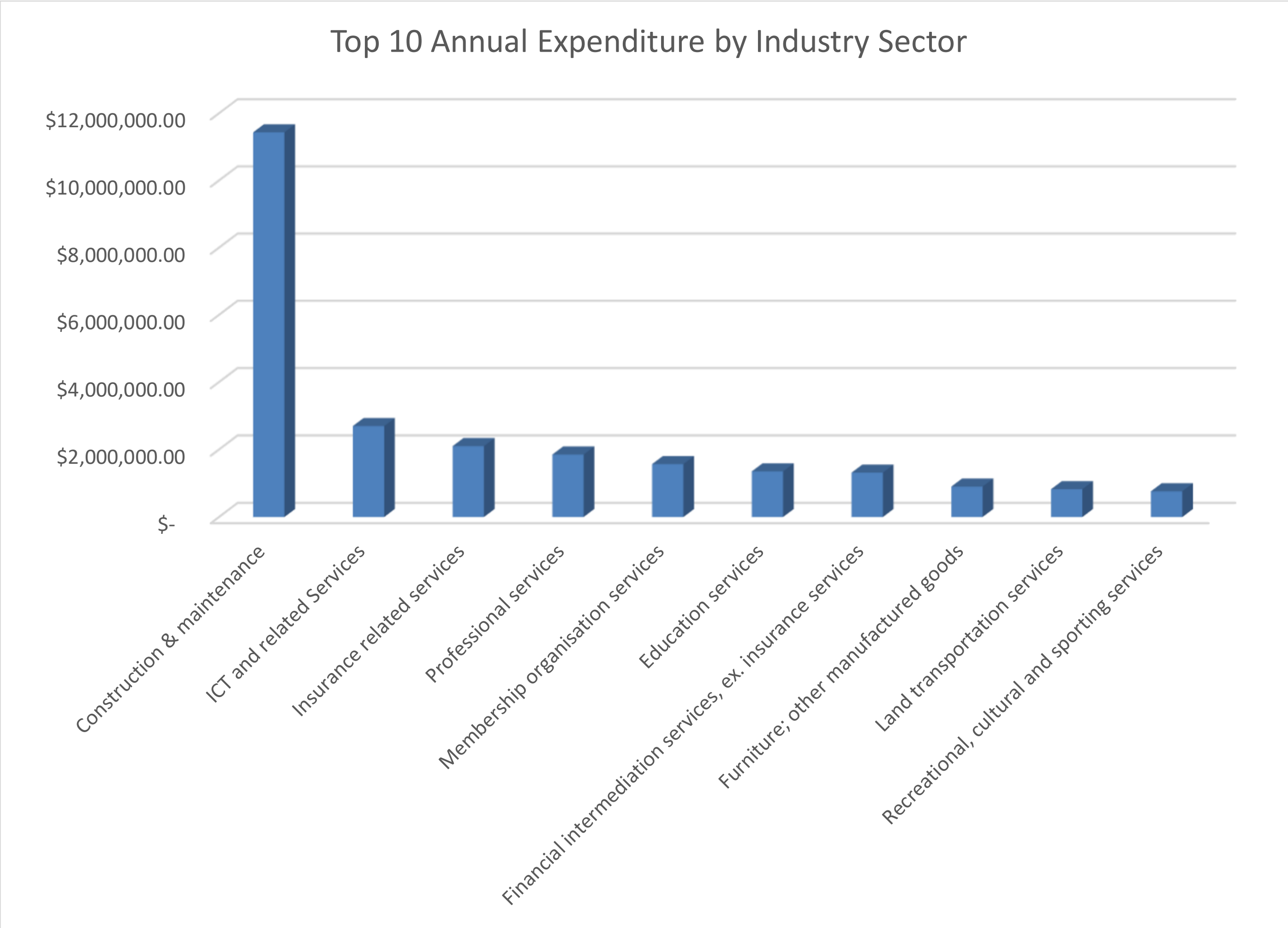
- Dynamic Learning College – FOR THE WHOLE OF LIFE
- Young Parents College – FOR THE WHOLE OF LIFE

TERTIARY EDUCATION

- Teaching School – FOR THE WHOLE OF LIFE

SPCEF's Supply Chain

Excluding staff-related costs, our supply chain comprised approximately 1,100 direct ("Tier 1") suppliers during the reporting period, with total procurement expenditure of $32 million. Construction and maintenance represented the largest spend category at $11.44 million, followed by ICT and related services at $2.70 million, and insurance-related services at $2.10 million. Our top 10 industry sectors by annual expenditure account for approximately 77% of total supply chain spend, as shown below.



From a geographic perspective, the vast majority of SPCEF's Tier 1 supply chain (over 99.6%) is located within Australia. Less than 1% is distributed across the United States, the United Kingdom, New Zealand, and Germany combined.

Identifying & Assessing Modern Slavery Risk in SPCEF's Supply Chain

During the 2025 reporting period, we again engaged Fair Supply Analytics ("FSA") to undertake a detailed mapping of our supply chain using 2025 financial data. This analysis has enhanced visibility across multiple tiers of the supply chain and supported a more robust assessment of associated modern slavery risks.

Under FSA's risk assessment methodology, supply chain risk is expressed as the 'theoretical slavery footprint' ("TSF"), defined as the estimated number of people in forced labour per $1 million of procurement spend. Measuring TSF on a per–$1 million basis, rather than as an absolute figure, enables meaningful comparison over time and mitigates the risk of distortion arising from changes in total expenditure. Acknowledging that TSF is a modelled estimate and should be interpreted only as an indicative rather than a direct measure of actual instances of modern slavery, the results of our 2025 risk assessment are as follows:

- The TSF across SPCEF's full supply chain (to Tier 10+) was ***0.0139 per $1 million spent*** (2024: 0.0155).
- The TSF for Tier 1 suppliers was lower, at 0.0039 per $1 million spent.

According to FSA's global benchmarking data, entities classified as "low risk" (bottom 7%) demonstrate a TSF of 0.022 or below per $1 million spent. On this basis, ***SPCEF's overall exposure to modern slavery risk is considered relatively low***.

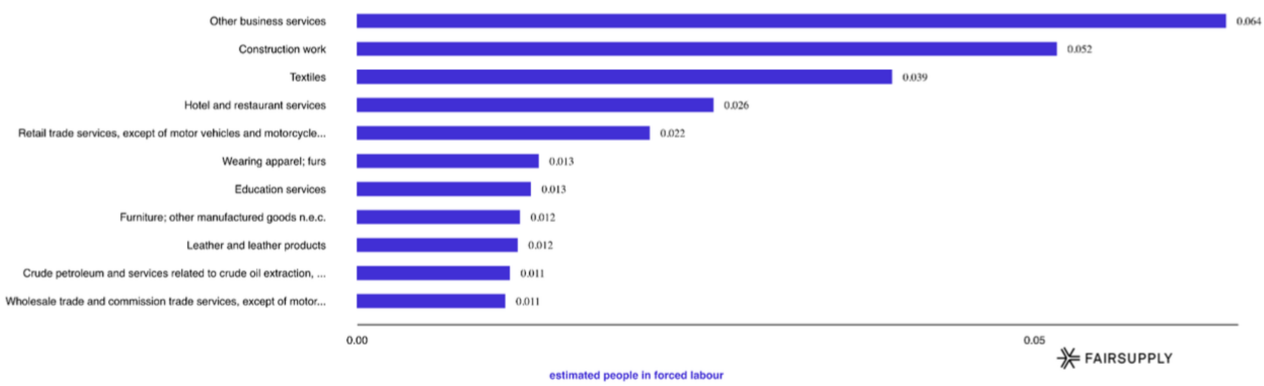
Supply Chain – *Industry Risk*

The highest exposure to modern slavery risk across our full supply chain (Tier 10+) was in "Other business services" (approximately 0.064 persons, representing 14.31% of total exposure). This category includes a broad range of services such as cleaning, facilities maintenance, waste management, and consulting. The next highest exposures were "Construction work" (0.052 persons, 11.41%) and "Textiles" (0.0395 persons, 8.81%).

While sectors such as construction, facilities maintenance, and cleaning form a significant portion of our procurement and are generally considered higher risk, FSA assesses our ***overall exposure as low***. This is largely due to ***our predominantly Australia-based supplier base***, which operates within stronger regulatory and labour frameworks.

By contrast, although "Textiles" represents only 0.39% of total procurement spend, it carries a relatively higher TSF per dollar spent, reflecting its exposure to higher-risk geographic regions (refer to the next section).

TSF (no. of people) by Industry – All Supply Chain (Tier 10+)

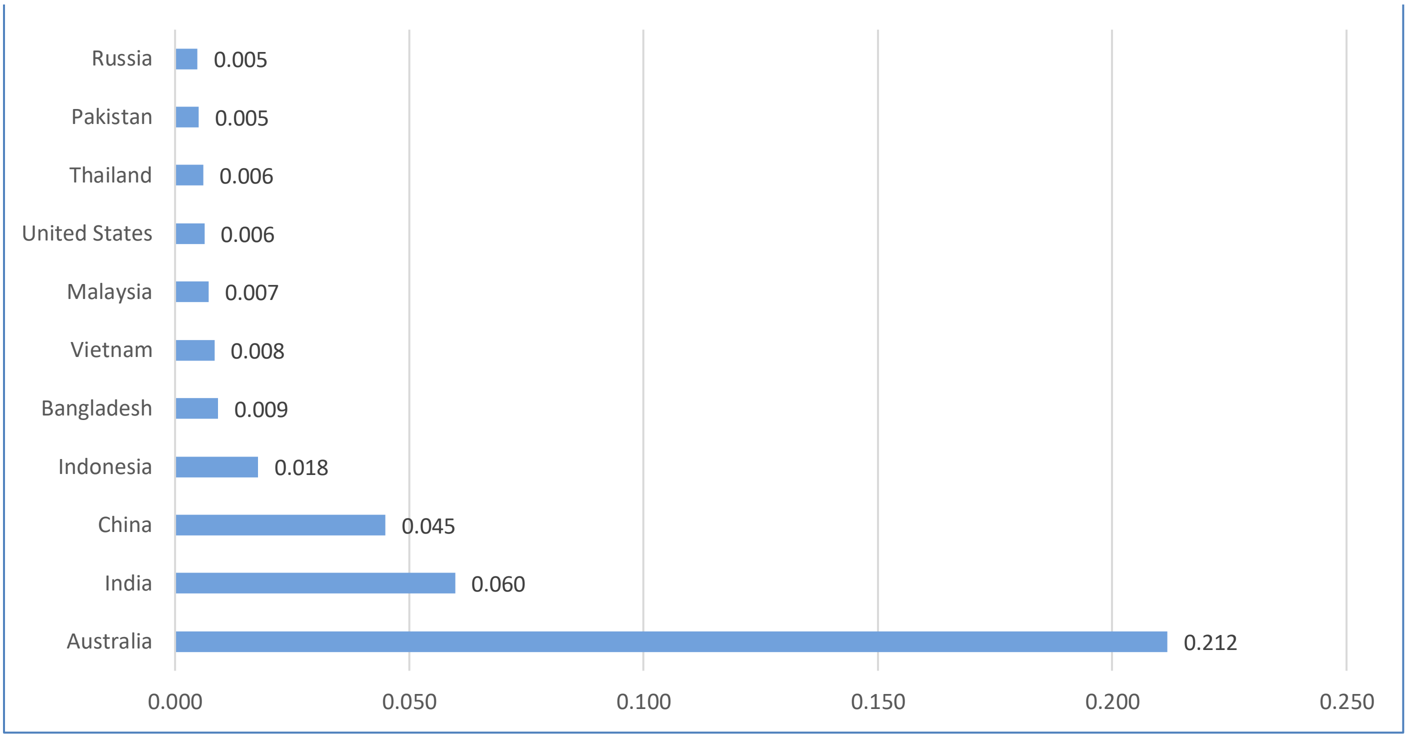


Supply Chain – *Geographical Risk*

Based on FSA's analysis which accounts for our whole supply chain (Tier 10+), the top 10 geographical exposures account for 83.95% of total TSF. ***Australia represents approximately 47.2% of this exposure, followed by India (13.3%) and China (10%)***. This reflects upstream supply chain linkages, including Australian suppliers sourcing textile and wearing apparel from these locations to support our sporting goods and furnishing requirements.

Despite this, our ***high domestic concentration of Tier 1 suppliers (over 99.6%)*** provides SPCEF with a stronger ability to influence supplier practices. This remains a key consideration in our ongoing efforts to identify and address modern slavery risks.

Top 10 TSF by Geography – All Supply Chain (Tier 10+)



Conclusion

SPCEF considers that there is ***a relatively low risk of it causing or contributing to modern slavery*** through its operations and supply chains.

As an Australian provider of educational services, SPCEF's operations and supply chain are comparatively less complex than those of many other industries. The organisation employs most of its workforce directly on permanent contracts and is not directly engaged in overseas labour or manufacturing activities.

SPCEF acknowledges, however, the ***potential for indirect exposure*** to modern slavery risks, where suppliers may source goods or services from overseas entities with a higher risk profile.

Actions Taken to Date to Address Modern Slavery Risk

- Established Modern Slavery Policy with the Board's approval
- Heightened awareness by publishing our annual Modern Slavery Statement on the SPCEF policy webpage
- Opened a reporting channel for suspected modern slavery publicly available
- Launched Modern Slavery Awareness for Managers online training
- Implemented Modern Slavery Management Plan
- Subscribed to the Office of the Australian Anti-Slavery Commissioner (OAAC) mailing list
- Attended "Moving the Needle—Exploring Options for Due Diligence Laws to Combat Modern Slavery" webinar hosted by the OAAC
- Assessed alternative supplier risk assessment tools
- Continued engagement of Fair Supply Analytics to conduct supplier risk assessment
- Implemented new and existing supplier screening processes

Assessing The Effectiveness of Actions Taken

During the reporting period, we focused on embedding risk-based due diligence within our procurement processes, implementing our Modern Slavery Management Plan, and strengthening awareness of modern slavery risks among our senior leadership team. As these initiatives remain at an early stage of implementation, we are not yet able to fully assess their effectiveness. However, we have commenced the establishment of governance frameworks and supporting procedures to enable the ongoing monitoring and review of our efforts to identify, mitigate, and manage modern slavery risks across our operations and supply chains.

Next Steps

- Continue to review and uplift our governance and policy framework
- Rollout online Modern Slavery Awareness training to all people-managing staff
- Explore the inclusion of modern slavery declarations with key and suppliers of higher risk profiles
- Continue to identify and address significant risks in and beyond Tier 1 of our supply chain based on a risk-based approach
- Identify and develop potential Key Risk Indicators that are suitable for measuring effectiveness in managing Modern Slavery risks.

Modern Slavery Compliance Maturity Framework

	LEVEL 1: INITIAL	LEVEL 2: DEVELOPING	LEVEL 3: ESTABLISHED	LEVEL 4: LEADING
IDENTIFY	Ad hoc awareness of modern slavery risks. No formal processes.	Basic mapping of supply chains and operations. Some risk awareness.	Comprehensive risk assessments conducted regularly. Key risk areas identified.	Advanced analytics and stakeholder engagement used to proactively identify emerging risks.
MITIGATE	No formal controls or policies in place.	Policies and supplier codes of conduct introduced. Some training provided.	Risk-based due diligence embedded in procurement. Contracts include modern slavery clauses.	Integrated risk management across operations. Industry collaboration and innovation in mitigation.
REMEDIATE	No remediation processes or grievance mechanisms.	Basic grievance mechanisms in place. Limited remediation actions.	Clear remediation protocols. Victim support pathways established.	Victim-centered remediation embedded. Transparent reporting and continuous improvement.
MONITOR & IMPROVE	No monitoring or reporting.	Some internal monitoring. First modern slavery statement drafted. KRIs being identified.	Regular monitoring, audits and reporting. KRIs measured and tracked.	Continuous improvement culture. Independent assurance and stakeholder feedback integrated.

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