

2024

Modern Slavery Statement



HAILEYBURY

This Modern Slavery Statement is submitted on behalf of Haileybury (ABN 34 004 228 906), under section 13 of the Modern Slavery Act 2018 (Cth)(MSA) to cover the reporting period of 1 January 2023 – 31 December 2023.



About us

Acclaimed as a great private school, Haileybury is a uniquely rewarding educational experience. Through our innovative approach to teaching and learning, students can discover more, achieve more and become more.

Since 1892, when our doors first opened with five staff and 17 students in attendance, Haileybury has been a centre of continual development: learning, teaching and location have all undergone transformative change on our path to become the School we are today.

The School has enrolments exceeding 7,000 across its campuses and operations in Berwick, Brighton, Keysborough, Melbourne City, Darwin (Northern Territory) and across South East Asia in China, Vietnam, the Philippines and Timor-Leste. Haileybury's mission is to develop high-achieving students, connected globally, to each other, and to the communities in which they live and which they will serve.

The School is strongly committed to principles of fairness, equity and human rights. We believe we have a shared responsibility to contribute to positive social change both locally and globally.

Haileybury has three wholly owned subsidiaries none of which is a reporting entity for purposes of the MSA. These are as follows: Haileybury Foundation (ABN 70 142 288 346), Haileybury International (ABN 80 159 734 193) and Haileybury Rendall School (ABN 84 325 837 304).

This statement extends to the activities and operations of Haileybury and its above-mentioned subsidiaries.

Haileybury is committed to operating responsibly and establishing and adhering to the highest ethical standards. This is the School's fourth Modern Slavery Statement.

Structure and operations

As indicated above, Haileybury is an independent School for all genders with physical campuses in Keysborough, Brighton, Berwick, and Melbourne (City), and an online campus, Haileybury Pangea. Haileybury has three subsidiaries: Haileybury Foundation, Haileybury International and Haileybury Rendall School, which is based in Darwin. None of these subsidiaries meets the reporting threshold under the MSA.

Haileybury is registered as a charity with the Australian Charities and Not-for-profits Commission and is governed by a board of directors known as its Council, comprising non-executive volunteers. The CEO | Principal, supported by the Chief Operating Officer and Senior Executive Team, is responsible for the day-to-day management and operations of the School and its subsidiaries.

The principal activity of the School operations in Australia is the provision of kindergarten, primary and secondary education.

Schooling is provided in Tianjin, China under the Haileybury name, but Haileybury does

not have a majority interest in these schools, nor does it control them. Haileybury Senior School Tianjin is a boarding school for Chinese students from Y10 to Y12. Another school, Tianjin Haileybury Elite School, which is neither owned nor controlled by Haileybury, is a Years 1-9 Chinese School that leases facilities and shares some staff with Haileybury Senior School Tianjin.

Haileybury has a non-controlling share in a joint venture company in China. That company has a Management Agreement with Haileybury Senior School Tianjin. Haileybury has two out of five members on the joint venture company board. Haileybury Senior School Tianjin is neither majority-owned nor controlled by Haileybury and its board is made up entirely of Chinese citizens, none of whom is connected to Haileybury.

Despite not directly managing the Schools, Haileybury commits to working with the management in China to investigate and manage any potential modern slavery risks in the operations and supply chains of the Chinese schools.





Supply chains

During the 2023 reporting period, Haileybury continued its engagement with industry experts, FairSupply Analytics, to undertake extensive supply chain mapping.

The vast majority of Haileybury’s Tier 1 supply chain is located in Australia, as represented in table 1. This localised supply chain provides Haileybury with a greater level of influence over the practices of its suppliers, which has been a factor in designing our 3-Year Modern Slavery Action plan, discussed later in this statement.

Country	Percentage of Total Spend
Australia	98.8903%
New Zealand	0.3392%
United States	0.3229%
United Kingdom	0.2482%
Singapore	0.0975%
Philippines	0.0635%
Germany	0.0181%
Ireland	0.0088%
Denmark	0.0075%
Spain	0.0033%
China	0.0007%

Table 1: Tier 1 Supply Chain by Country

Approximately 80% of Haileybury’s supplier spend during the reporting period occurred in the following categories. This shows some correlation with the industry-based risk ranking discussed in the subsequent section.

Category	Percentage of Total Spend	Share of estimated people in forced labour	Estimated people in forced labour per \$M	Estimated people in forced labour
Facilities – Construction Trades & Services	27.91%	28.65%	0.633	0.3101
Facilities – Repairs & Maintenance	11.12%	12.38%	1.607	0.1329
Travel – Outdoor Education & Tour Providers	8.22%	6.67%	0.800	0.0713
Transport – Chartered Vehicle Services	6.07%	1.86%	0.010	0.0202
Facilities – Cleaning	5.06%	6.05%	0.150	0.0654
ICT – Managed Services	4.65%	1.93%	0.151	0.0209
Professional Services – Consulting – Other	2.68%	1.95%	0.859	0.0201
Facilities – Utilities	2.43%	1.14%	0.101	0.0122
Facilities – Food & Catering	2.42%	6.73%	1.708	0.0712
Professional Services – Architectural and Design	1.88%	1.35%	0.122	0.0145
Educational – Books & Learning Resources	1.63%	1.20%	1.937	0.0102
ICT – Software & Licensing	1.62%	0.83%	0.289	0.0082
School Operations – External Education Providers	1.57%	1.63%	1.974	0.0155
ICT – Printers & Associated Services	1.41%	1.39%	0.057	0.0150
ICT – Telecommunications	1.29%	0.60%	0.045	0.0066

Table 2: Top 80% of Supplier Spend by Supplier Category

The structure of spending largely aligns to the ongoing operational requirements of the School, with the exception of Construction Trades and Services, which is reflective of several major capital projects completed within the reporting period.



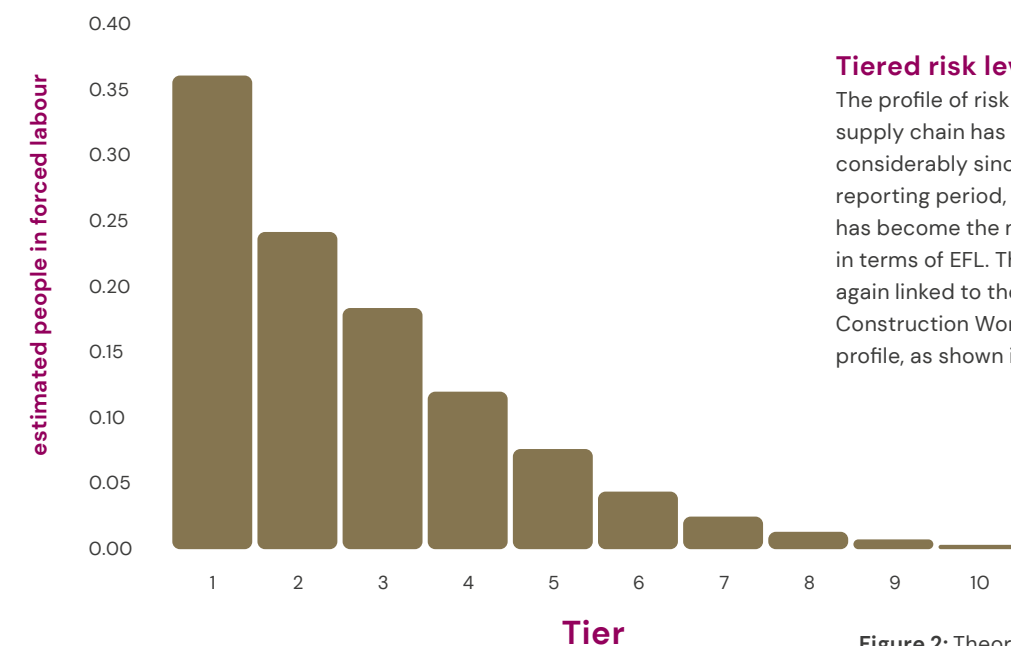
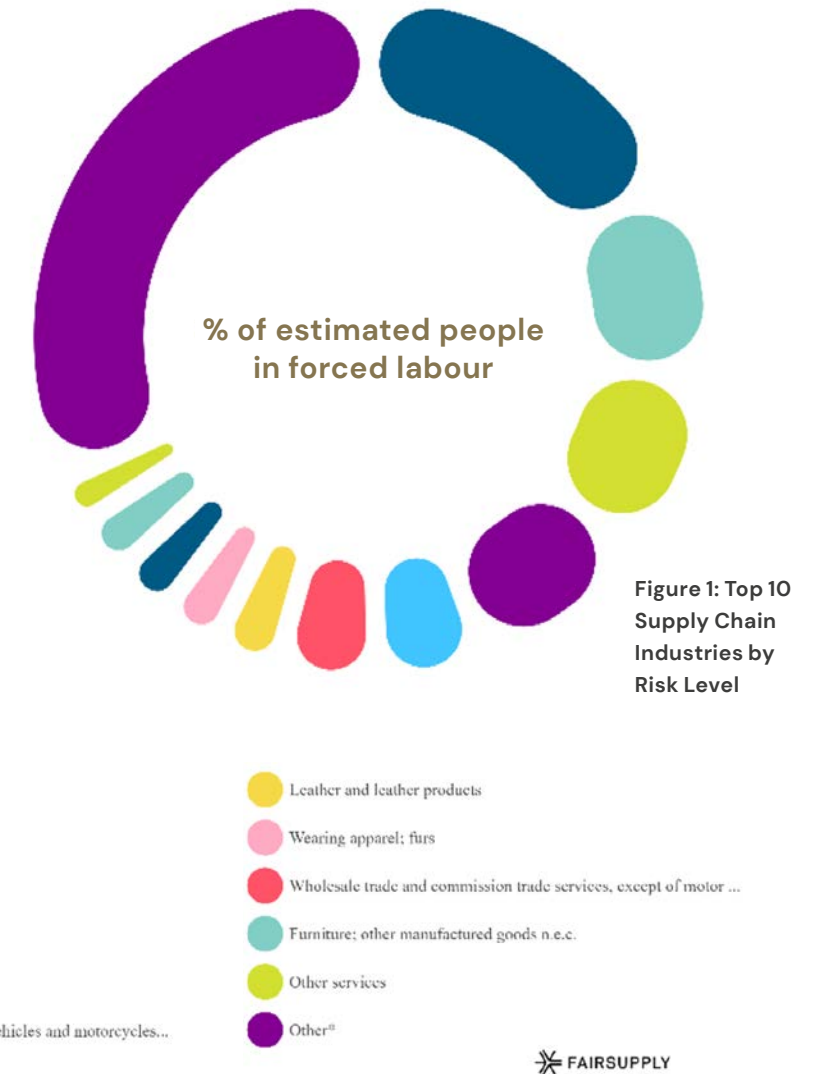
Supply chain risks

Having now completed several years of supply chain analysis, Haileybury has gained a deeper understanding of its supply chain risks across a range of metrics, including by supplier, supply chain tier, industry, and country. Supply chain risk is represented in the 'estimated people in forced labour' (EFL) which indicates the theoretical number of people in conditions of modern slavery within the supply chain. In order to consistently measure the organisation's impacts on modern slavery, the EFL can be measured per million dollars spend (EFL/M).

Haileybury's holistic EFL/M at the end of the 2023 reporting period was 0.0181. This represents a 25% increase since the same time last year and coincides with a shift in supply chain risk up the supply chain as discussed later in this statement. Given the relevant stability of Haileybury's top supplier categories, this increase is a factor of increased risk exposure across these industries more broadly, rather than a shift in the School's supplier profile or operations.

Higher risk industries

Haileybury's top 10 industries by risk level is consistent with the prior reporting period. Notably, construction work features highly as a result of major capital projects undertaken during the 2022 and 2023 reporting periods. Textiles, despite being most significant in risk level, carries almost no risk in Tier 1 of the supply chain which is in stark contrast to Construction Work where the majority of risk is held in Tier 1.



Tiered risk level
The profile of risk in Haileybury's supply chain has shifted considerably since the prior reporting period, wherein Tier 1 has become the most significant in terms of EFL. This is once again linked to the significance of Construction Work in our spend profile, as shown in Figure 2.

Figure 2: Theoretical Slavery Footprint by Supply Chain Tier

Figure 3: Percentage of Theoretical Slavery Footprint by Industry at Tier 1 of the Supply Chain

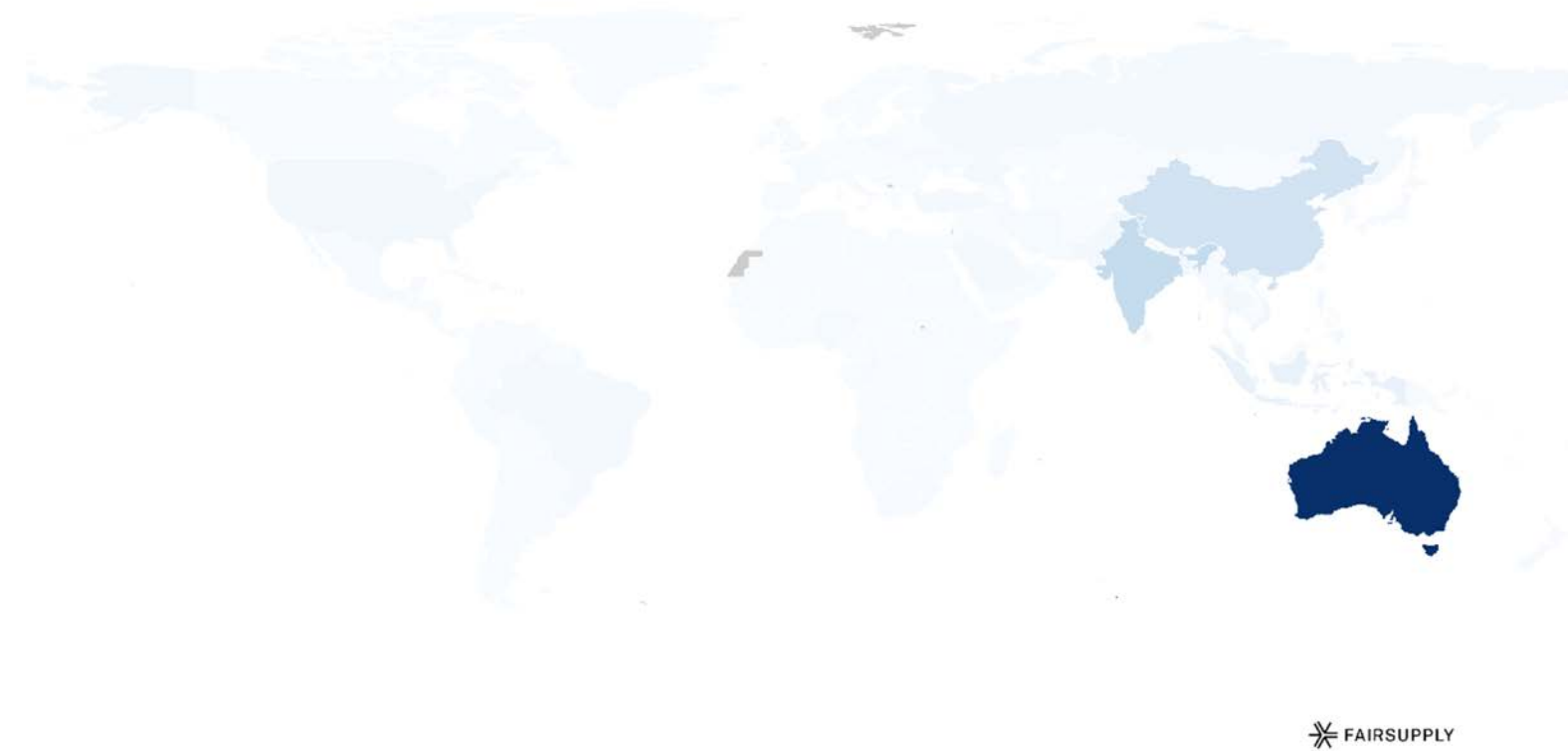


The view of tiered supply chain risks supports Haileybury's strategies for addressing modern slavery risks in our supply chain, as defined in our 3-Year Modern Slavery Action Plan. Our Action Plan has a strong focus on supplier engagement and education, which will have the greatest impacts on the top tiers of our supply chain.

- Construction work
- Other land transportation services
- Hotel and restaurant services
- Computer and related services
- Education services
- Furniture; other manufactured goods n.e.c.
- Other business services
- Supporting and auxiliary transport services: travel agency serv...
- Other services
- Products of forestry, logging and related services
- Recreational, cultural and sporting services
- Other*



Figure 4: Theoretical Slavery Footprint by Country



Geographical risk

The map above represents Haileybury's TSF by geographical location. Over 85% of Haileybury's EFL exists within 10 countries, represented in the table below.

Country	Estimated people in forced labour	Percentage %
Australia	0.5546	51.13%
India	0.1355	12.50%
China	0.1025	9.45%
Indonesia	0.039	3.59%
Bangladesh	0.0192	1.77%
Vietnam	0.0176	1.62%
Malaysia	0.0159	1.47%
Thailand	0.0152	1.40%
United States	0.0148	1.37%
Pakistan	0.012	1.11%

Australia ranks highly, predominantly due to the concentration of Haileybury's Tier 1 supply chain, and therefore spend. The remaining countries feature most highly in tiers 2 to 4, with Tier 2 being represented most highly.

Specific supplier risk

Using the risk analysis, Haileybury has ranked each of its suppliers by risk level. This enables greater due diligence and engagement with higher-risk suppliers to ensure that Haileybury is able to influence anti-modern slavery practices in the highest impact areas of its supplier base through supplier agreements and other direct engagement. Those suppliers representing the highest risk will be the focus of the supplier engagement and education strategies articulated in our 3-Year Modern Slavery Action Plan.

Since 2021, Haileybury has conducted modern slavery surveys of its suppliers and has received 772 survey responses in that time. During the 2022 reporting year, Haileybury implemented the survey as a mandatory requirement for all new suppliers onboarded. Since the inception of the survey program, suppliers who indicate having a high degree of visibility over their supply chains have increased year-on-year to 43% in the 2023 reporting year.



Operational risks

Haileybury provides (either directly or through a subsidiary or affiliate):

- > Early Learning, including kindergarten, for children aged 3–5 in Australia
- > Schooling for international and local children aged 5 – 18 in Australia
- > Boarding and residential care (via a third-party homestay provider) in Australia for local and international children
- > The Victorian Certificate of Education (VCE) and English as an Additional Language (EAL) courses in Chinese Schools including in Qingdao, Chengdu, Tianjin, Ningbo, Wuhan, Luoyang, Tongcheng, Sanshui and Beijing (Haidian District) and in schools in Timor-Leste, the Philippines and Vietnam.

Haileybury's delivery of the VCE internationally (as referred to above) extends only to the provision of curriculum advice and teacher training. Students undertaking the Haileybury VCE internationally are cared for by their local schools.

We acknowledge the potential risks that our operations pose and have taken actions as described below in order to address those potential risks. However, given our primary operations consist of the education of children, the very core of our business requires a deep understanding of how to ensure the best interests of the child are prioritised at all times. We are very familiar with the inherent vulnerability of children and work every day to safeguard the wellbeing and education of our students. We consider this focus of our business to lower the risks of modern slavery posed by our operations.

Through our interaction with Haileybury Senior School Tianjin and Tianjin Haileybury Elite School, we will work to influence and ensure a similar ethos within those schools' Chinese operations, recognising that as an investment of Haileybury, it is important for us to manage any risks of modern slavery within that environment.

Actions taken to assess and address risks

During the earlier reporting periods, Haileybury began to lay the foundations of its anti-modern slavery program, opening dialogue with its suppliers and initiating surveys to understand the maturity of approach to modern slavery within its supplier base. Anti-modern slavery clauses were developed and embedded into supplier contracts and the School began to lay the groundwork for an informed anti-modern slavery approach.

During the 2023 reporting period, Haileybury has continued to advance its anti-modern slavery program by:

- > Developing a 3-Year Modern Slavery Action Plan
- > Further embedding anti-modern slavery clauses into supplier contracts as contract renewals have occurred and in agreements for new services
- > Undertaking a third round of supply chain risk assessments through engagement with FairSupply Analytics, further developing a view of supply chain risk over time
- > Developing a robust Procurement Framework
- > Establishing a dedicated Procurement Officer role
- > Establishing a Modern Slavery Working Group involving senior leaders and subject matter experts within the organisation

This is in addition to existing due diligence, governance and risk management measures, including:

- > Established processes to ensure that all labour hire companies are licensed by the Victorian Labour Hire Authority or its equivalent elsewhere in Australia
- > A Financial Delegation Policy and Framework governing procurement authority to ensure appropriate management oversight over supplier selection and management
- > A Whistleblower program, including a dedicated, independent 24-hour whistleblowing hotline
- > Processes for supplier onboarding and the approval of new suppliers
- > An online contracts management system
- > Consolidating and improving the management of the School's suppliers which, in combination with the financial delegation policy and formal approval gates, ensures that there is greater scrutiny over supplier selection.



Supply chain risk assessment

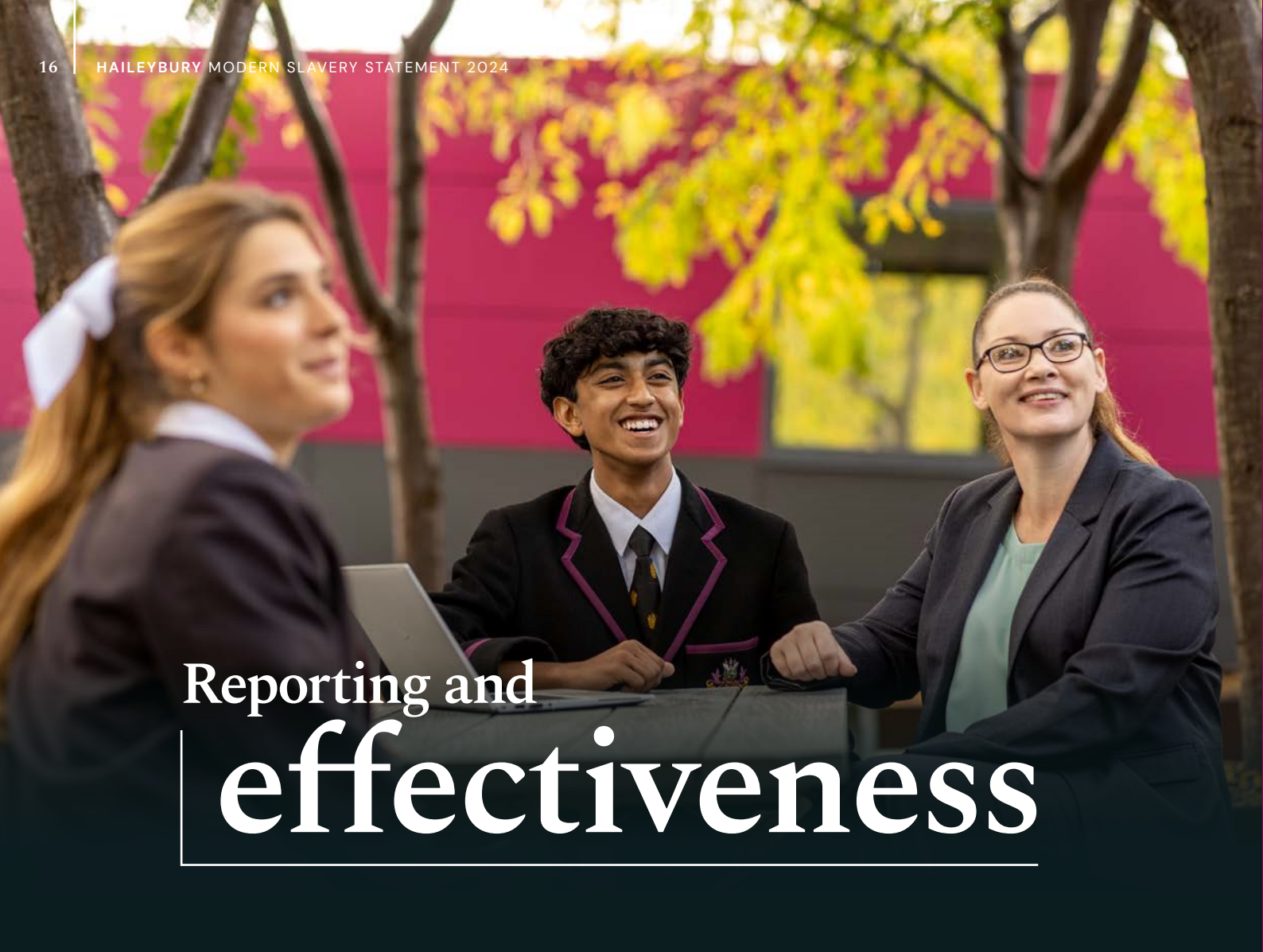
During the 2023 reporting period, Haileybury continued its engagement with FairSupply Analytics to undertake detailed supply chain mapping and risk assessment for our entire supplier base. FairSupply Analytics employs a proprietary analysis method to Haileybury's supplier and spend data, and a multi-regional input-output table, to thoroughly map our supply chain reaching up to 10 tiers.

This extensive analysis has provided invaluable insights to Haileybury to understand our existing risk profile as well as inform anti-modern slavery initiatives moving forward. This is the third consecutive year that Haileybury has undertaken the supply chain risk assessment with Fair Supply Analytics. As we collect data about our supply chain risks over time, we are able to draw greater insights on the nature of modern slavery risk in our supply chain and the effectiveness of our supply chain risk mitigation measures.

Supplier surveys

During the reporting periods 2020 through 2023, Haileybury has conducted surveys of our suppliers to assess the level of modern slavery awareness and risk mitigation within our supplier base. As at the end of the 2023 reporting period, we have received approximately 772 survey responses from suppliers in a wide range of categories and of varying size.

For many of Haileybury's smaller suppliers, our survey has been a catalyst for the consideration of modern slavery risks in their operations and supply chains.



Reporting and effectiveness

We take our obligations to our students, staff and community very seriously. The School has a range of reporting mechanisms to ensure that the effectiveness of our governance and risk control measures are monitored by the Senior Executive and School Council.

This includes the completion of mandatory training programs, whistleblower complaints and other key assurance measures designed to ensure our risk control measures are effectively implemented.

We see collaboration in the supply chain as a critical success factor in addressing modern slavery risks and, as such, supplier engagement in our anti-modern slavery program initiatives is an important indicator of effectiveness. Having now embedded modern slavery reporting in the onboarding process for all new suppliers and incorporating modern slavery requirements in all new supplier contracts we are deepening the engagement with suppliers at an earlier stage.

Haileybury's EFL/M will provide a key reporting metric for measuring the effectiveness of our anti-modern slavery approach. This metric can be used at a supplier or industry level, or as a holistic measure at the organisational level.

Consultation with subsidiaries

Many of Haileybury's central functions are shared amongst its wholly owned subsidiaries referred to above, and they share our key suppliers. Many of the members of the governing bodies of our subsidiary entities are members of the Haileybury School Council.

There is significant collaboration and consultation between Haileybury entities in all aspects of our operations, including our approach to addressing modern slavery risks.

Looking ahead

Haileybury's 3-Year Modern Slavery Action Plan forms the basis of our efforts to combat modern slavery risk in the coming reporting period. The Action Plan comprises 4 pillars: Educate; Be Informed; Mitigate Risk; Evaluate.

Specific initiatives captured in Year 1 of the Action Plan include:

- Building awareness among our staff, supplier and student cohorts through the provision of training materials and seminars

- Reviewing and updating our existing modern slavery supplier survey
- Introducing improved modern slavery reporting metrics
- Implementing the newly developed procurement framework, including a supplier code of conduct
- Undertaking a self-assessment of organisational maturity in modern slavery risk management.

Our Modern Slavery Statement will be reviewed and updated annually.

From our principal governing body

Haileybury makes this Statement in accordance with section 13 of the Modern Slavery Act 2018 (Cth). This Modern Slavery Statement was considered and approved by the Haileybury School Council on [insert date]. The Haileybury School Council is Haileybury's Principal Governing Body under the MSA.

Prof Gregory Whitwell

Chairman of Council
Responsible Member of Haileybury's Principal Governing Body

