



Modern Slavery Statement

Introduction

This is the first Modern Slavery statement submitted by Cranbrook School ("the School") pursuant to the Modern Slavery Act 2018 (Cth), for the financial year ending 31 December 2025. It outlines the actions the School has taken to identify and address the risks of modern slavery in its operations and supply chains.

The School recognises its responsibility to respect human rights and is committed to the prevention of modern slavery in all its forms, including forced labour, child labour, debt bondage, human trafficking, forced marriage, deceptive labour recruitment and other exploitative practices.

This Statement has been prepared in accordance with the mandatory criteria set out in the Modern Slavery Act 2018 (Cth). The table below identifies where each mandatory criterion is addressed in this Statement.

MANDATORY CRITERION	SECTION OF THIS STATEMENT
Identify the reporting entity	Introduction; About Cranbrook School
Describe the structure, operations and supply chains of the reporting entity	Structure, Operations and Supply Chains
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities it owns or controls	Modern Slavery Risks in Operations and Supply Chains
Describe the actions taken to assess and address those risks, including due diligence and remediation processes	Actions Taken to Assess and Address Modern Slavery Risks
Describe how the reporting entity assesses the effectiveness of such actions	Assessing the Effectiveness of Our Actions
Describe the process of consultation with any entities the reporting entity owns or controls	Consultation with Controlled Entities
Provide any other relevant information	Future Commitments; Further Information

About Cranbrook School

Cranbrook School is a private, independent Anglican school located in Bellevue Hill, NSW. The School provides education to students from Pre-Kindergarten to Year 12. The School operates two Pre-School campuses, a Junior School campus, a Senior School campus and an Outdoor Education campus.

The School is a public company limited by guarantee, incorporated under the Corporations Act 2001 (Cth) and registered as a charity under the Australian Charities and Not-For-Profits Commission Act 2012. The School is governed by the Cranbrook School Council ("the School Council").



The School's vision is to be a world class school which encourages and enables all of our students to explore, enjoy and fulfil their potential. We guide each student to discover and develop their talents, to give their best, and to find both fulfilment and joy in the pursuit of excellence. We offer a rich and distinctive education, within and beyond the curriculum, underpinned by strong and compassionate pastoral care. Grounded in our Anglican foundation, we nurture the moral and spiritual development of every student. The School's motto, *esse quam videri* – "to be, rather than to seem to be" – reflects our commitment to authenticity, character and service.

The School aims to build resilience and confidence so that each student can face the challenges of the twenty-first century with personal confidence, intellectual versatility, academic hunger and optimism. We inspire and support them to respect the integrity of differences, lead adventurous, courageous and generous lives contributing to the betterment of society.

We believe that every child is unique and provide motivation and challenge for those with academic or creative gifts, and appropriate support for children with learning needs.

Cranbrook School is an IB World School and, in 2020, we became one of the first independent schools in Sydney to be accredited as an IB Continuum School, offering each of the PYP, MYP and IB Diploma Programme.

The School employs around 350 full-time, part-time, and casual staff, including teachers, administrative, support, and operational personnel. Our core operations involve the delivery of educational services and the provision of a safe and supportive learning environment.

Structure, Operations and Supply Chains

The Head of School is the most senior employee of the School and is responsible for the overall management and operations of the School. The Head of School leads an Executive team which includes a number of leadership including the Chief Operating Officer, Head of Senior School & Deputy Headmaster and Head of Junior School.

The School's supply chains span local, national, and international suppliers and include:

- Procurement of educational resources and digital technologies
- School uniforms, sportswear, and merchandise
- Building and construction services
- Facilities management, cleaning, and groundskeeping
- Catering, food services, and canteen operations
- IT and communication systems
- Travel, events, and extracurricular services

Modern Slavery Risks in Operations and Supply Chains

While the School's direct operations are based in Australia and considered low risk for modern slavery, we acknowledge that risks may be present in our extended supply chains, particularly in the following sectors:

- Apparel and textiles (e.g. uniforms manufactured offshore)
- Electronics (e.g. laptops and tablets sourced globally)
- Construction and building materials
- Contract cleaning and catering services
- Suppliers operating in jurisdictions with lower labour standards or transparency

The complexity of these supply chains can obscure visibility and create potential for exploitation, particularly where subcontracting is involved.

Actions Taken to Assess and Address Modern Slavery Risks

The School has assessed its operations and supply chains to evaluate the risk of modern slavery practices.

Assessment of our Operations

We have identified a low risk of modern slavery in the School's internal operations. This is due to a number of factors, including: the direct employment relationship between the School and its teaching and non-teaching staff; the direct engagement of peripatetic music tutors and many other individual contractors; the employment laws, enterprise agreements and awards that apply and with which the School is required to comply and the highly regulated nature of the school education industry, generally, and the independent education sector, in particular.

The School has strong employment policies and practices based on existing employment laws, awards, and other regulations within the sector. The School also has a Code of Conduct which requires all staff, contractors and volunteers of the School to maintain the highest standards of ethical business conduct in support of the School's commitments to its suppliers and contractors, including to act honestly and fairly in its relationships and to endeavour to procure goods and services from those organisations demonstrating good ethical practice.

Assessment of our Supply Chain

We have identified that modern slavery risks may exist in areas within our supply chain based on factors such as:

- Product/service type
- Suppliers that may engage impermanent or low skilled workers
- Industry practices
- Employment status trends
- Geography/location

The following table outlines potential modern slavery risks further:

SUPPLY CHAIN	POTENTIAL MODERN SLAVERY RISK
Cleaning Services	• Contracted service provider engages low skilled/migrant workers. These workers may be subject to poor employment conditions and have restricted knowledge/ability to bargain. • Possible debt-bondage arrangements.
Construction	• Contracted service providers engage low skilled/migrant workers. These workers may be subject to poor employment conditions and have restricted knowledge/ability to bargain. • Possible debt-bondage arrangements.



SUPPLY CHAIN	POTENTIAL MODERN SLAVERY RISK
Catering / Food Services	- Contracted service provider engages low skilled/migrant workers. These workers may be subject to poor employment conditions and have restricted knowledge/ability to bargain. - Possible debt-bondage arrangements. - Food products (e.g. rice, tea, chocolate) may be sourced from countries with histories of exploitative labour practices and limited legal protection for workers.
Security Services	- Contracted service provider engages low skilled/migrant workers. These workers may be subject to poor employment conditions and have restricted knowledge/ability to bargain. - Possible debt-bondage arrangements.
Information and Communications Technology Equipment and Services	Goods and equipment may be produced in factories in countries with histories of exploitative labour practices and limited legal protection for workers.
Sport and Co-curricular	Goods and equipment may be produced in factories in countries with histories of exploitative labour practices and limited legal protection for workers.
Uniforms and Merchandise Sales	Goods and equipment may be produced in factories in countries with histories of exploitative labour practices and limited legal protection for workers.
Grounds and Building Maintenance Services	- Goods and equipment may be produced in factories in countries with histories of exploitative labour practices and limited legal protection for workers. - Work may sometimes be outsourced to contractors. Contractors engage low skilled/migrant workers. These workers may be subject to poor employment conditions and have restricted knowledge/ability to bargain.
Other Equipment and Consumables	Goods and equipment may be produced in factories in countries with histories of exploitative labour practices and limited legal protection for workers.



Actions taken in relation to our Supply Chain

We have commenced and will continue to develop the following actions to mitigate modern slavery risks:

- 1. Supplier Risk Assessments:** We are conducting preliminary mapping and assessment of suppliers and contractors covered by the categories in the table above to evaluate their modern slavery exposure. We have distributed Modern Slavery Risk Questionnaires to our Cleaning, Catering, Groundskeeping, IT, Uniforms, and Sport Equipment suppliers. These Questionnaires ask about a supplier's:
 - Organisation structure and visibility over supply chains;
 - Existing policies and any person/team responsible for overseeing modern slavery risks;
 - Training conducted for staff on how to identify, assess and respond to modern slavery risks;
 - Awareness of any vulnerable low-skilled migrant workers in their direct operations or supply chains;
 - Awareness of any workers being required to lodge 'security deposits' or pay recruitment fees;
 - Awareness of any workers being required to have their identity documents stored by someone else;
 - Stance on deducting wages, imposing monetary fines or withholding pay/entitlements of workers in its direct operations or awareness of any such practices in its supply chain;
 - Provision of pay slips showing the clear payment of legal entitlements (wages and superannuation);
 - Provision of written contracts in languages that their workers understand, and where terms of employment including wage rates and hours of work are clear;
 - Screening and monitoring of the conditions of accommodation provided to workers in its direct operations or supply chains;
 - Stance on the freedom of movement and resignation ability for any workers in its direct operations or supply chains;
 - Provision of complaints mechanisms for workers to raise workplace grievances and seek remedies;
 - Response process towards any allegation of modern slavery in its direct operations or supply chains.
- 2. Contractual Safeguards:** We are updating standard procurement and tender documentation to include clauses relating to compliance with modern slavery laws.
- 3. Supplier Engagement:** Key suppliers are now required to provide assurances of ethical sourcing practices and, where applicable, copies of their own Modern Slavery Statements.
- 4. Policy Development:** We are developing a Modern Slavery Policy to guide future procurement.
- 5. Internal Awareness:** Members of the School's senior leadership and procurement teams have been briefed on the School's obligations under the Modern Slavery Act 2018 and the importance of supply chain due diligence.

Assessing the Effectiveness of Our Actions

This is the School's first Modern Slavery Statement. The School's focus this reporting period was to gain greater insight into our modern slavery risks and how such risks may be present in our operations and supply chains.

At this early stage, we are unable to adequately assess the effectiveness of measures we have undertaken. However, we have commenced developing and implementing frameworks and processes for reviewing the



effectiveness of actions taken to assess and address modern slavery risks. This will inform future actions and plans to mitigate modern slavery risks.

For now, the School will have dedicated personnel reviewing and amending existing hiring and procurement policies, processes and procedures to ensure that they are compliant with the Modern Slavery Act. The School is also consulting with internal personnel and external suppliers on how to commence effective and efficient reporting mechanisms for suspected breaches of the Modern Slavery Act.

To assess the effectiveness of our actions in mitigating modern slavery risks, the School has and will continue to:

- Track and review supplier responses to enquiries about their Modern Slavery Statements and/or policies to mitigate modern slavery risks.
- Record instances of non-compliance, inability or questionable ability to satisfy ethical sourcing requirements.
- Monitor the inclusion and use of modern slavery risk contractual clauses in procurements.
- Identify areas requiring improved processes, training and transparency in supply chain visibility.

While we have not identified any specific instances of modern slavery in our operations or supply chains during this report period, we remain vigilant and committed to continual improvement.

Future Commitments

In the next reporting period, Cranbrook School intends to:

- Finalise and implement an Ethical Sourcing and Modern Slavery Policy.
- Deliver formal training on modern slavery awareness for relevant staff.
- Increase due diligence during supplier engagement, particularly for suppliers in the categories identified in the table above.
- Implement a regular supplier audit process.
- Explore opportunities to collaborate with industry bodies and other schools on best practices.
- Include modern slavery monitoring in the agenda items whenever the relevant School Council committee meetings occur.
- Use various platforms to stay current with legislative changes and best practices.
- Ensure that staff are supported by clear pathways to raise modern slavery concerns in accordance with the Complaints Handling Policy & Procedure, namely through the submission of complaints to complaints@cranbrook.nsw.edu.au. A record of any Modern Slavery concerns will be kept.

Consultation with Controlled Entities

The School also founded the Cranbrook Foundation Ltd (ABN 74001 481 107). The Cranbrook Foundation is a company limited by guarantee and a registered charity under the Australian Charities and Not-For-Profits Commission Act 2012 (Cth). The Cranbrook Foundation is administered by a Board of Directors.

This Statement covers all operations and functions under the legal control of Cranbrook School and consultation has occurred across the School to inform the content of this Statement.



**CRANBROOK
SCHOOL**

Further Information

For further information about this Statement please contact:

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Approval

This Statement was approved by the Cranbrook School Council in its role as principal governing body on 9 June 2026.

Signed

Geoff Lovell
President of the Cranbrook School Council
18 June 2026

Dr Anne Johnstone
Head of School
18 June 2026

Submitted on 24 June 2026