

2023

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 2022 – 31 December 2022

About us

With 130 years of history, Haileybury is one of the leading independent schools in Australia and the Asia-Pacific region with physical campuses in Keysborough, Brighton, Berwick, Melbourne (City) and (through a subsidiary) Darwin, Haileybury Pangea online campus, and associated educational delivery in Asia in China, Vietnam, the Philippines and Timor-Leste. The School is recognised for its outstanding academic achievements and broad range of co-curricular activities. Learning is based on the different learning styles of students, and on their gender, age, interests and potential.

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 third Modern Slavery Statement.

Structure and operations

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 being 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 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 Year 10 to Year 12. 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.

Notwithstanding the fact that Haileybury does not control Haileybury Senior School Tianjin, or the Tianjin Haileybury Elite School, within the meaning of the Australian Modern Slavery Act, Haileybury recognises that it has an interest in each school, given it is a part of Haileybury's investments. Haileybury continues to work to understand, assess and address any modern slavery risks which may be present within the operations and supply chains of the Chinese schools.





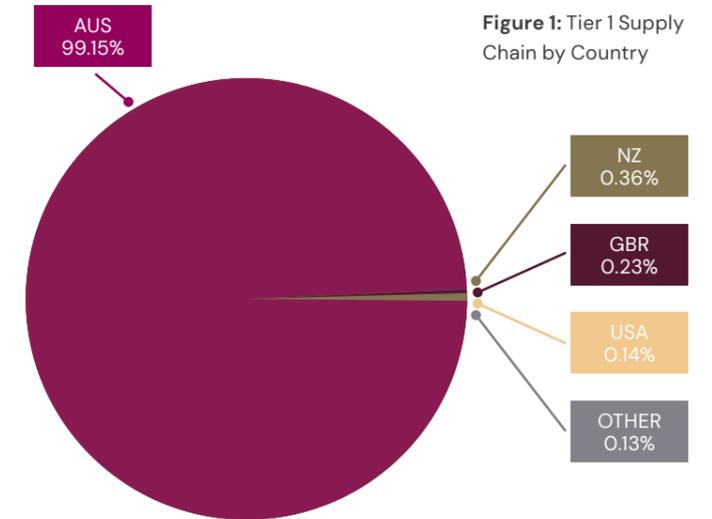
Supply chains

During the 2022 reporting period, Haileybury continued its engagement with industry experts, Fair Supply Analytics, to undertake extensive supply chain mapping. Having undertaken a supplier reclassification process during the 2021 reporting period, in addition to enabling a higher degree of visibility over our supply chain, we are now able to identify changes and trends in the makeup of our supply chain from year to year.

The vast majority of Haileybury’s Tier 1 supply chain is located in Australia, as represented in the chart below. This localised supply chain provides Haileybury with a greater level of influence over the practices of its suppliers, which will be a factor in our future actions to address modern slavery risks.

Haileybury, through engagement with Fair Supply Analytics, has further mapped its supply chain up to 10 tiers and identified those which occur in higher risk countries and industries, which is discussed further in later sections.

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 next subsequent section.



| Supplier Category | Theoretical Slavery Footprint | Theoretical Slavery Footprint per \$M | % of Total Theoretical Slavery Footprint \$Million | % of Total Spend |
|--------------------------------------------------|-------------------------------|---------------------------------------|----------------------------------------------------|------------------|
| Facilities – Construction Trades & Services | 0.1493 | 0.5545 | 10.31% | 31.94% |
| Facilities – Repairs & Maintenance | 0.0467 | 0.9222 | 17.15% | 10.01% |
| Travel – Outdoor Education & Tour Providers | 0.0220 | 0.2757 | 5.13% | 9.19% |
| ICT – Managed Services | 0.0115 | 0.0669 | 1.24% | 7.59% |
| Transport – Chartered Vehicle Services | 0.0082 | 0.0075 | 0.14% | 6.98% |
| Facilities – Cleaning | 0.0280 | 0.0900 | 1.67% | 6.60% |
| Professional Services – Architectural and Design | 0.0128 | 0.0506 | 0.94% | 5.95% |
| Facilities – Utilities | 0.0067 | 0.0807 | 1.50% | 3.53% |
| Educational – Books & Learning Resources | 0.0088 | 0.9779 | 18.19% | 2.81% |
| School Operations – External Education Providers | 0.0095 | 1.1514 | 21.42% | 2.77% |
| Professional Services – Consulting – Other | 0.0049 | 0.1873 | 3.48% | 2.67% |
| Facilities – Food & Catering | 0.0093 | 0.6563 | 12.21% | 2.65% |
| Facilities – Construction Materials | 0.0082 | 0.1352 | 2.52% | 1.95% |
| ICT – Software & Licensing | 0.0029 | 0.1321 | 2.46% | 1.82% |
| Advertising & Marketing – Digital Advertising | 0.0037 | 0.0460 | 0.86% | 1.78% |
| Facilities – Security | 0.0038 | 0.0414 | 0.77% | 1.77% |

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



Supply chain risks

Through the risk analysis conducted by Fair Supply Analytics, 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 ‘theoretical slavery footprint’ (TSF) which indicates the theoretical number of people in conditions of modern slavery within the supply chain.

Haileybury’s total TSF for the 2021 reporting period was reported as 0.46. Improvements in the algorithms used to calculate the TSF have since revised that number to 0.24. The reported TSF for the 2022 period is 0.44. This 87% increase is closely correlated with a 75% increase in reported supplier spend during the reporting period. Further weighting of supplier spend in higher risk categories (most notably, spend on construction projects) has also contributed to the increased TSF.

Haileybury’s TSF per million dollars spent (TSF/\$M) has increased from 0.0071 to 0.0075 between the 2021 and 2022 reporting periods. This measure is a more reliable benchmark as it is not affected by fluctuations in supplier spend. Similarly to the TSF measurement, the slight increase in TSF/\$M between reporting periods is attributed to greater spending on construction projects.

Higher risk industries

Haileybury’s top 10 industries by risk level has changed significantly since the previous reporting period. Australian-based construction work features most highly and is aligned to the increased spending on construction projects during the reporting period. Notably, offshore industries are more highly represented which is not aligned with our Tier 1 spend. This indicates that modern slavery risk has moved deeper into our supply chains.



Figure 3: Top 10 Supply Chain Industries by Risk Level

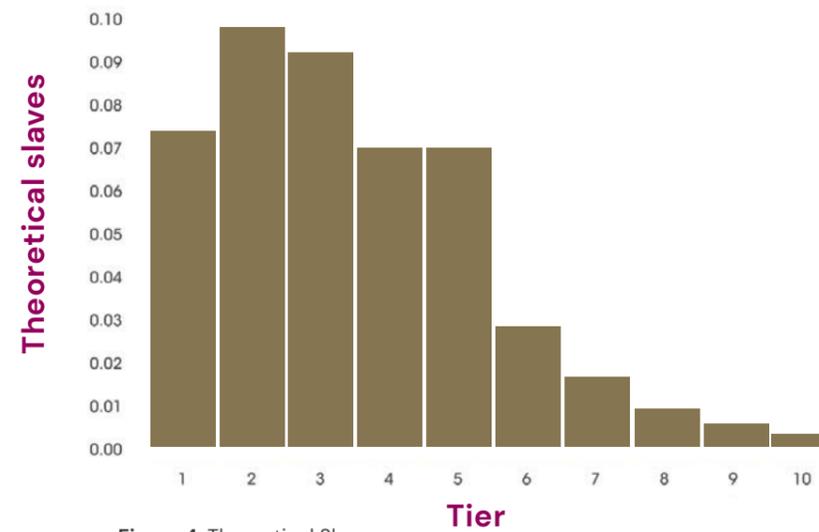


Figure 4: Theoretical Slavery Footprint by Supply Chain Tier

Tiered risk level

Haileybury’s supply chain risk is greatest in Tiers 1 to 5 of its supply chain and presents a similar profile to the prior reporting period¹.

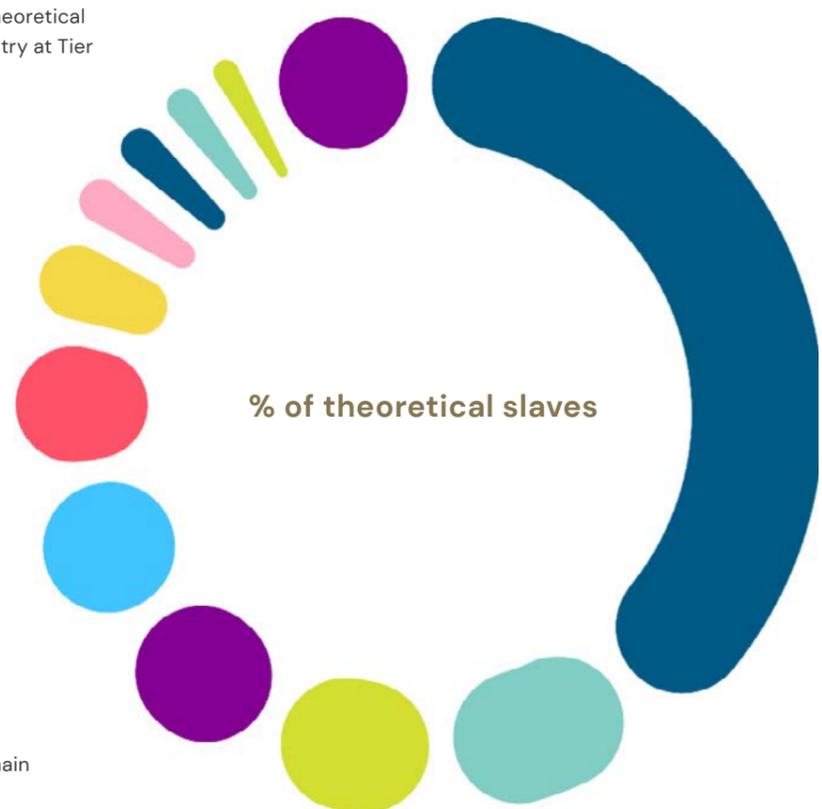
At Tier 1, the majority of risk exists onshore in Australia and is disproportionately attributed to the construction industry, as represented in Figure 5.

Beyond Tier 1, the supply chain begins to move offshore and is represented by a growing number of industries.

¹The tiered supply chain risk reported in Haileybury’s 2021 Modern Slavery Statement has since been revised as a result of improvements in the risk assessment methodology.

* ‘Other’ represents the aggregate of lower risk industries

Figure 5: Percentage of Theoretical Slavery Footprint by Industry at Tier 1 of the Supply Chain



- AUS Construction work
- AUS Furniture; other manufac...
- AUS Education services
- AUS Recreational, cultural a...
- AUS Printed matter and recor...
- AUS Computer and related ser...
- AUS Other services
- AUS Wearing apparel; furs
- AUS Hotel and restaurant ser...
- AUS Retail trade services, e...
- AUS Other business services
- Other*



The view of tiered supply chain risks provides the following important insights:

- > Haileybury can positively impact risk level by maintaining robust commercial and operational due diligence at the top tier of its supply chain
- > The greatest level of risk exists in our suppliers' top tier supply chain and therefore a focus on working with suppliers with mature anti-slavery practices and improving the anti-modern slavery practices of our suppliers in their own supply chains also has the potential for significant impact.

Figure 6: Theoretical Slavery Footprint by Country



Geographical risk

The map above represents Haileybury's TSF by geographical location. 66% of Haileybury's TSF exists within five countries, represented in the table below.

| # | Country | Theoretical Slavery Footprint | Percentage % |
|---|-----------|-------------------------------|--------------|
| 1 | Australia | 0.1247 | 28.3132 |
| 2 | China | 0.0755 | 17.1496 |
| 3 | India | 0.0456 | 10.3456 |
| 4 | Indonesia | 0.0285 | 6.4706 |
| 5 | Vietnam | 0.0231 | 5.2479 |

Australia ranks highly, predominantly due to the concentration of Haileybury's Tier 1 supply chain, and therefore spend. The remaining top four countries feature most highly in Tiers 2 to 4, with Tier 3 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.

Modern slavery survey responses have been received from 27 of Haileybury's top 50 suppliers by risk level. A further two are excluded as a state government entity and local water authority. The survey responses show that many of these higher risk suppliers have begun to address modern slavery risks within their organisations and supply chains. Of the 27 respondents, 22% are reporting entities under the Modern Slavery Act, whilst 56% have stated a moderate to high level of visibility over their supply chains.

During the reporting period, the School has placed a focus on ensuring that all top 50 suppliers by risk had responded to our Modern Slavery Supplier Survey. Changes in our spending profile over the reporting period have affected our risk profile resulting in changes in our top 50 suppliers by risk. Haileybury will work with the remaining suppliers during the 2023 reporting period to ensure that all relevant top 50 suppliers have completed the School's Modern Slavery Supplier Survey.

Further information about Haileybury's future measures is provided in later sections.

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 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.

COVID-19 pandemic



We acknowledge that the COVID-19 pandemic may have increased the vulnerability of those within our operations and supply chains. The pandemic has led to unprecedented and unanticipated pressures on businesses worldwide.

Being an independent school, driven by consistent demand, our budgetary pressures are relatively unaffected by COVID-19. We have not had to take any drastic action in relation to our operations or supply agreements as a result of the COVID-19 pandemic. We therefore did not filter down pressure upon our own workers or suppliers or other businesses.

Actions taken to assess and address risks

During our first and second 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 2022 reporting period, Haileybury has continued to advance its anti-modern slavery program by:

- > Developing a draft three-year anti-modern slavery strategic roadmap
- > Further embedding anti-modern slavery clauses into supplier contracts as contract renewals have occurred and in agreements for new services
- > Incorporating mandatory modern slavery supplier surveys in the onboarding process for all new suppliers
- > Undertaking a second round of supply chain risk assessments through engagement with Fair Supply Analytics, beginning to build a picture of supply chain risk over time
- > Developing and implementing elements of our Procurement Framework
- > Establishing a dedicated Procurement Coordination role.

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 2022 reporting period, Haileybury engaged with Fair Supply Analytics to undertake detailed supply chain mapping and risk assessment for our entire supplier base. Fair Supply Analytics employed their proprietary analysis methods 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.

A slavery footprint using existing research data was then overlaid to estimate the impact and risk level of Haileybury's supply chain, represented as our 'theoretical slavery footprint' (TSF).

This extensive analysis has provided invaluable insights to Haileybury to understand our existing risk profile as well as informing anti-modern slavery initiatives moving forward. This is the second 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 2020, 2021 and 2022 reporting periods, 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 2022 reporting period, we have received approximately 450 survey responses from suppliers in a wide range of categories and of varying size.

As referenced earlier, more than half of our highest risk suppliers have responded to our survey and the majority of those respondents have implemented some level of anti-modern slavery practice in their organisations.

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 TSF 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

Armed with a deeper understanding of our supply chain risk and the beginning of a trend of modern slavery risk over time, Haileybury will finalise our draft three-year strategic plan to address modern slavery risks. Our strategic plan will target higher risk suppliers and industries where we can be most impactful, as well as developing upon our existing procurement practices.

Our procurement framework will be fully developed and implemented and the newly created Procurement Coordinator role will be filled.

We will continue to survey our suppliers and ensure that there is engagement with all those considered to be of higher risk. We will continue to explore appropriate performance indicators which can be incorporated into our governance reporting and monitored on an ongoing basis.

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 24 February 2023. The Haileybury School Council is Haileybury's Principal Governing Body under the MSA.

Richard Tom Poulton
Chairman of Council
Responsible Member of Haileybury's Principal Governing Body

