

2025 Modern Slavery Statement for



1. Introduction

Scotch College (“the College”) is committed to promoting and protecting human rights, addressing modern slavery risks and managing any identified modern slavery incidents. This Statement outlines the College’s commitment to minimising the risk of modern slavery taking place within our own operations or associated supply chains.

Modern slavery is a criminal offence under Division 270 and 271 of the [Criminal Code Act 1995](#) (Cth) and is a violation of human rights. Acts of modern slavery breach the most fundamental freedoms of individuals, and the College recognises that modern slavery is never acceptable under any circumstances.

The College will not knowingly engage in or support any activities that involve modern slavery, forced labour, or human trafficking.

This statement is the College’s first Modern Slavery Statement pursuant to the Modern Slavery Act 2018 (Cth).

2. Scotch College Overview

The College operates as an independent boys’ school which was founded in 1851 and is based on a single campus in Hawthorn Victoria. The College educates over 1,900 students from Prep to Year 12 and caters for both day students and boarders.

The College’s purpose, values and aspirations are summarized below:



3. College Structure and Operations

The reporting entity is Scotch College ABN 86 852 826 445, a company registered with limited liability. The College's structure incorporates the:

- Scotch College Building & Library Funds, both of which are registered deductible gift recipient funds ("DGR")
- Gardiner Hill Pty Ltd ABN 57 005 740 027
- Scotch College Common Fund ABN 54 914 179 378
- Scotch College Charitable Trust ABN 99 624 071 255 which is a separate trust and DGR of which Scotch College is the corporate trustee and
- Scotch College Museum Trust ABN 59 303 075 900 which is a separate trust and DGR of which Scotch College is the corporate trustee.

The College is governed by a Council, comprising of 17 members. The day-to-day management of the College is delegated to the Principal.

The below graphic represents the geographical region of our operations. For the context of modern slavery, this map, and the supply chain maps that follow, have been overlaid with the colour tier system of the [Trafficking in Persons Report](#). The report discusses the US "Trafficking Victims Protection Act of 2000" ("Act"), which outlines the minimum standards for the elimination of trafficking in persons and categorises countries as to what extent they met the minimum standards of the Act and/or are making significant efforts to comply with the associated standards.



4. Operations & Supply Chain Overview and Associated Risks in Relation to Modern Slavery

The College deals directly with a number of suppliers across a broad range of industries. Our suppliers operate in the following sectors:

- Accommodation and Food Service Activities
- Administration and Support Services
- Agriculture, Forestry, and Fishing
- Arts, Entertainment and Recreation
- Building services contractor
- Cleaning
- Construction
- Domestic work
- Education
- Electricity, Gas, Steam and A/C supply
- Finance and Insurance
- Government administration, Defence and Social Security
- Health and Social Work
- Information and Communication
- Labour hire
- Maintenance and Repair of motor vehicles
- Manufacturing
- Mining and Quarrying
- Personal services
- Professional and Scientific Services
- Real estate
- Retail
- Security services
- Transportation and Storage
- Water supply, Sewerage and Waste Management and
- Wholesale.

Based upon work undertaken with many of our suppliers, we have determined that they operate in (and source from), many locations across the world, including:

- Albania
- Algeria
- Andorra
- Angola
- Antigua and Barbuda
- Argentina

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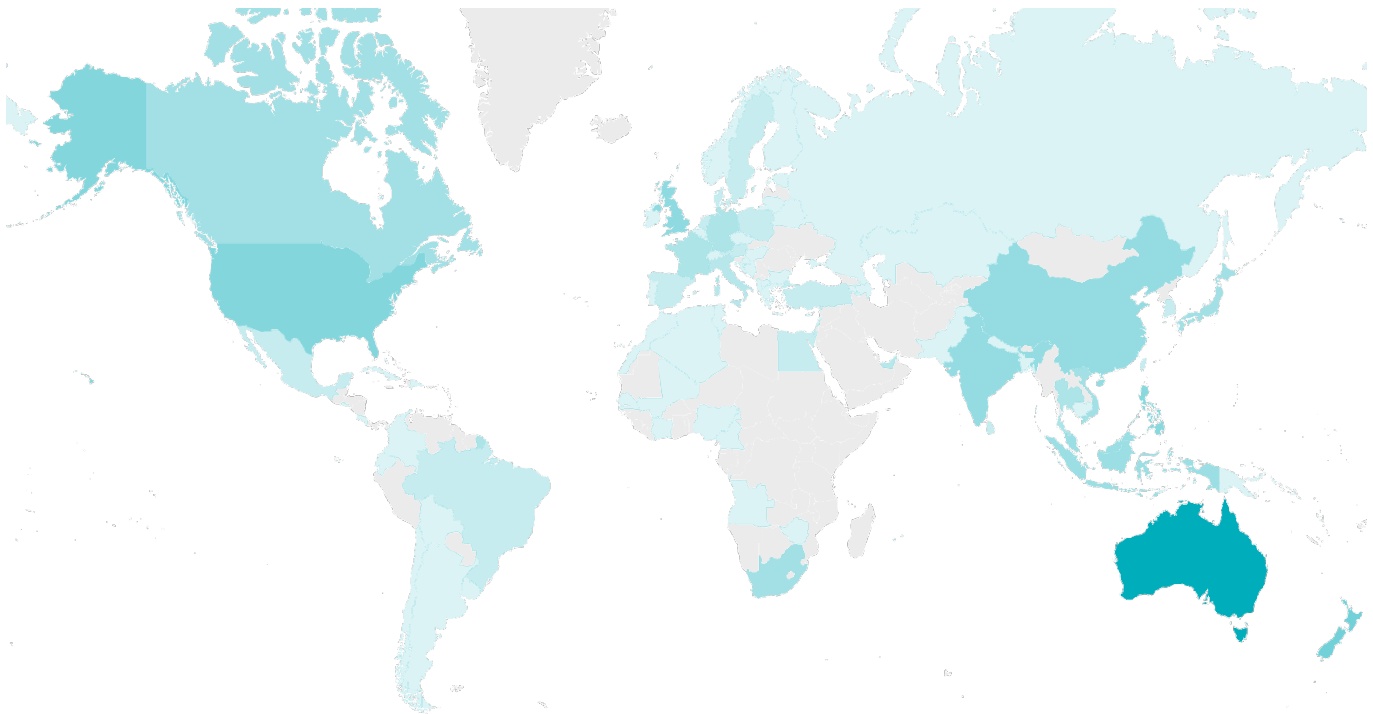
- Armenia
- Aruba
- Australia
- Austria
- Azerbaijan
- Bahamas
- Bahrain
- Bangladesh
- Barbados
- Belarus
- Belgium
- Bolivia (Plurinational State of)
- Bosnia and Herzegovina
- Brazil
- Brunei Darussalam
- Bulgaria
- Cambodia
- Cameroon
- Canada
- Chile
- China
- Colombia
- Costa Rica
- Cote d'Ivoire
- Croatia
- Cuba
- Cyprus
- Czech Republic
- Denmark
- Dominica
- Dominican Republic
- Ecuador
- Egypt
- El Salvador
- Estonia
- Finland
- France
- Germany
- Greece
- Grenada
- Hong Kong

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- Hungary
- India
- Indonesia
- Ireland
- Israel
- Italy
- Japan
- Kazakhstan
- Lebanon
- Lithuania
- Luxembourg
- Macau
- Malaysia
- Maldives
- Mali
- Malta
- Mauritius
- Mexico
- Monaco
- Morocco
- Nepal
- Netherlands
- New Zealand
- Nigeria
- North Macedonia
- Norway
- Pakistan
- Papua New Guinea
- Philippines
- Poland
- Portugal
- Republic of Korea (South Korea)
- Russian Federation
- Senegal
- Singapore
- Solomon Islands
- South Africa
- Spain
- Sri Lanka
- Sweden
- Switzerland

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- Taiwan
- Thailand
- Timor-Leste
- Tunisia
- Turkey
- United Arab Emirates
- United Kingdom of Great Britain and Northern Ireland
- United States of America
- Uruguay
- Vanuatu
- Vietnam
- Zimbabwe



Further to the comments made in the Introduction at Section 1), it is acknowledged that modern slavery refers to various forms of exploitation and coercive practices that deprive individuals of their freedom, rights, and dignity. It encompasses situations where individuals are forced or coerced into labour, servitude, or human trafficking against their will. Modern slavery can take different forms, including forced labour, debt bondage, forced marriage, human trafficking, and child labour.

The International Labour Organisation estimates that over 50 million people around the world are victims of modern slavery. In recent years, supply chain transparency is a key policy strategy used by governments to identify and prevent business practices that lead to modern slavery.

The College has performed an assessment of its operations and supply chains to evaluate the risk of modern slavery practices.

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In assessing the risk of modern slavery in the College's supply chain and operations, various factors were considered including:

- Total contract value
- Product/ service category
- Country of manufacture/ origin and
- Suppliers that may employ a transient or low-skilled workforce.

As a service provider, over 67% of the College's cost base represents nearly 900 employees directly employed by the College, both on a permanent and casual basis. All employees are based in Australia, which is subject to highly regulated employment laws. In addition, the general education sector that the College operates in is also highly regulated. However, a number of our suppliers outside of the College's direct employees operate, produce, and source across several/ different sectors. Some of these sectors can be described as high-risk. High-risk sectors are those in which human trafficking activities are known to occur and were identified in the Global Estimates of Modern Slavery and child labour exploitation that were separately identified in Child Labour: Global Estimates 2020 Trends and the Road Forward (ILO and UNICEF, 2021).

The graphics below show the high-risk sectors of operation, production, and sourcing for our suppliers. The numbers in the following graphics describe how many suppliers are in the corresponding sectors.

SCOTCH COLLEGE MODERN SLAVERY STATEMENT

Our Suppliers Operate in the following High-risk Sectors



Accommodation and Food Service Activities

10



Agriculture, Forestries, and Fishing

6



Building services contractor

7



Cleaning

1



Construction

13



Domestic work

1



Labour hire

1



Maintenance and Repair of motor vehicles

2



Manufacturing

13



Mining and Quarrying

2



Personal services

1



Retail

18



Security services

2



Transportation and Storage

7



Wholesale

8

SCOTCH COLLEGE MODERN SLAVERY STATEMENT

Our Suppliers Produce Goods and Provide Services in the following High-risk Sectors



Accommodation and Food Service Activities

15



Agriculture, Forestries, and Fishing

4



Building services contractor

8



Cleaning

3



Construction

22



Domestic work

2



Labour hire

2



Maintenance and Repair of motor vehicles

3



Manufacturing

10



Mining and Quarrying

1



Personal services

4



Retail

21



Security services

4



Transportation and Storage

7



Wholesale

7

SCOTCH COLLEGE MODERN SLAVERY STATEMENT

Our Suppliers Source Goods and Services from the following High-risk Sectors



Accommodation and Food Service Activities

20



Agriculture, Forestries, and Fishing

2



Building services contractor

9



Cleaning

13



Construction

15



Domestic work

1



Labour hire

3



Maintenance and Repair of motor vehicles

10



Manufacturing

18



Mining and Quarrying

1



Retail

15



Security services

4



Transportation and Storage

9



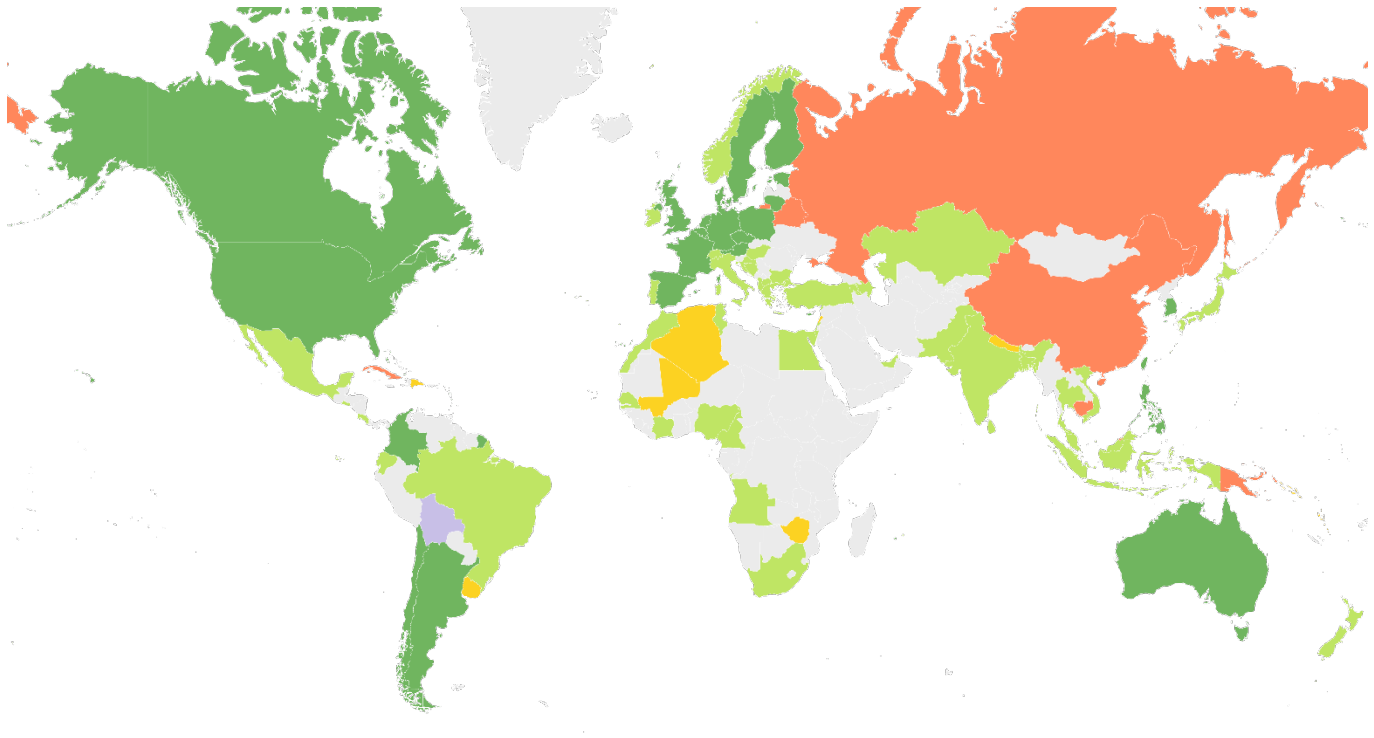
Wholesale

12

SCOTCH COLLEGE MODERN SLAVERY STATEMENT

Some countries or regions where our suppliers operate can be described as high-risk due to the possibility of a link to human trafficking.

The geographical regions where our supply chain partners operate are shown in the map below. This map has also been overlaid with the colour tier system of the [Trafficking in Persons Report](#).



SCOTCH COLLEGE MODERN SLAVERY STATEMENT

Some goods and services produced and sourced by our suppliers can be described as high-risk due to the possibility of a link to modern slavery practices such as forced labour and child labour.

The geographical regions where our supply chain partners produce and source goods and services that are considered high risk are shown in the maps below.

There is modern slavery risk associated with producing the following goods and services from the countries below:

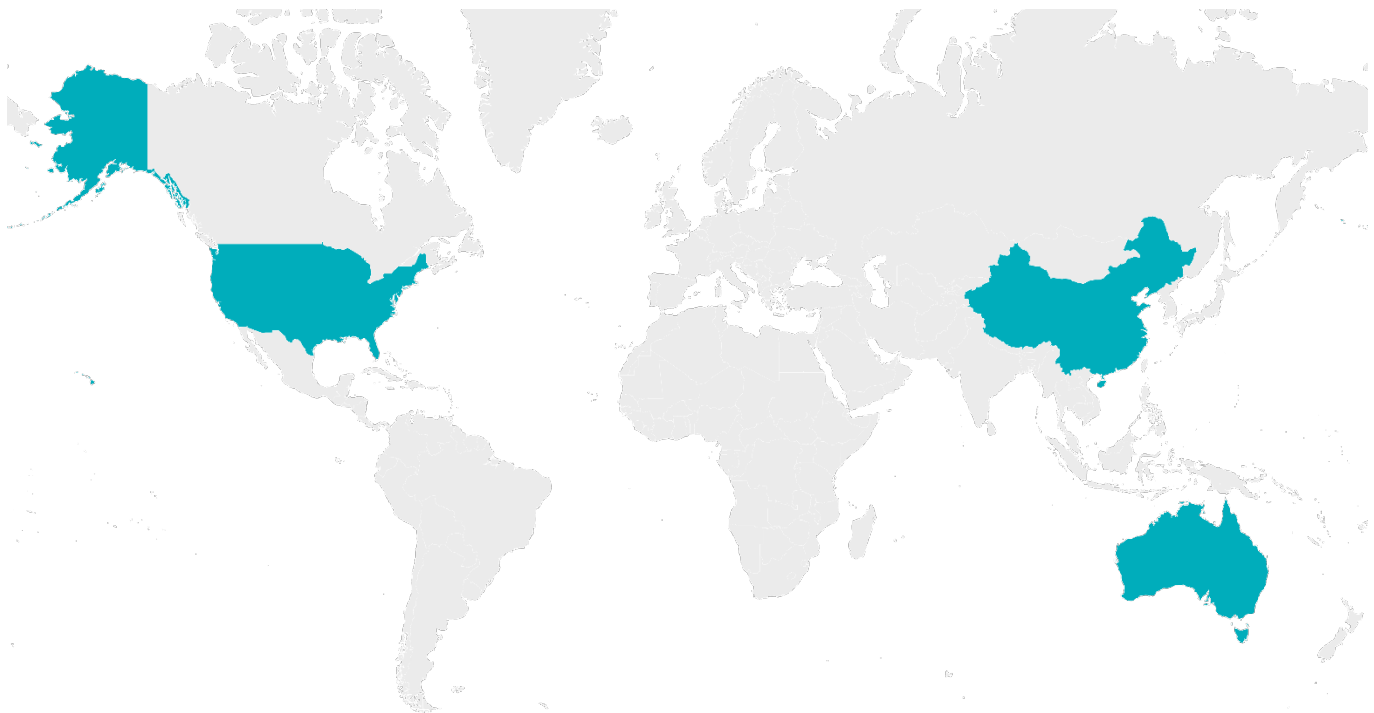
- Australia
 - Building services contractor
 - Cleaning
 - Labour hire
 - Security services
- China
 - Textiles



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There is modern slavery risk associated with sourcing the following goods and services from the countries listed below:

- Australia
 - Building services contractor
 - Cleaning
 - Labour hire
 - Security services
- China
 - Aluminium
 - Electronics
 - Garments
 - Polyvinyl Chloride (PVC)
 - Textiles
- United States of America
 - Building services contractor
 - Cleaning



5. Actions Taken Regarding Assessing Modern Slavery Risk and Effectiveness

As this is the College's first Modern Slavery Statement, it acknowledges that the assessment and response to modern slavery risks will be developed and refined over time. However, the College's approach will consist/ has consisted, of:

a) Risk Assessment

- Undertaking a risk assessment to identify where the high risks are within the College's supply chain. Relative risk was also considered as part of the assessment as a supplier may be considered high risk, but the level of expenditure incurred with that supplier is low/ minimal (done 2025)
- Periodically reviewing the College's supply chains beyond the initial full risk assessment for suppliers that may be at risk of modern slavery practices (2026 and ongoing)
- Engaging with key suppliers regarding modern slavery risks (2025 and ongoing)

b) Review Policies & Processes

- Developing a modern slavery policy (done 2025)
- Having new supplier contracts (particularly in-bound service agreements) incorporating clauses around modern slavery (established in 2025 and ongoing)
- Educating staff, particularly those involved in procurement, regarding modern slavery risks (commenced in 2025 and ongoing)
- Promoting the College's Whistleblower policy to key stakeholders as a mechanism to report and have followed up any concerns regarding potential modern slavery, including the ability to engage with the College's external Whistleblower service provider Stopline (ongoing)

c) Supplier Engagement

- Promoting the risks and concerns associated with modern slavery with suppliers generally (ongoing)
- Completion of a Modern Slavery Questionnaire by key at risk suppliers and subsequent review and action by the College where applicable (2025-2026 and ongoing as required). The College uses a third-party tool, the [iPRO Modern Slavery Assessment Tool](#) to assess modern slavery risks in our operations and supply chain. The risks identified previously were all identified utilising this assessment tool. The College engaged iPRO during the reporting period to conduct the assessments on our operations, and a bulk assessment of 196 of our suppliers. The 196 suppliers surveyed represent c85% of our non-payroll expenditure. We intend to update and refine this process annually, in the assessment of our operations and supply chain, regarding modern slavery risk.

Participating suppliers were asked to complete a self-assessment questionnaire online. After each supplier completed and submitted the questionnaire, their responses were assessed to determine their modern slavery risk scores and associated risk category.

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Each supplier that completed the assessment was assigned one of the following risk categories:

- High-risk (high levels of inherent risk)
- High-risk (inadequate risk control)
- Medium-risk (partial risk control)
- Low-risk (adequate risk control)
- Low-risk (low levels of inherent risk)

To determine the appropriate risk category, responses were first evaluated for risks inherent to a supplier's operations, production, and sourcing. This is referred to as the Inherent Risk Score. The Inherent Risk Score was calculated based on the geographical, type of goods, industry sector, and workforce parameters that the supplier indicated in the Modern Slavery Assessment Tool (MSAT).

Next, the Unmitigated Risk Score was evaluated. This score was calculated based on the policy and procedure responses on the questionnaire. A supplier's Unmitigated Risk Score determined whether they were categorised as having inadequate, partial, or adequate risk control.

Then, the risk scores for each assessed supplier were aggregated and averaged, resulting in an Aggregated Inherent Risk Score and an Aggregated Unmitigated Risk Score for the overall supply chain.

d) Monitor & Report

- The College will regularly monitor its supply chains
- Periodically review its modern slavery related policy, procedures, processes and contractual clauses and
- Report to the Risk Committee of Council as required.

e) Assessing the effectiveness of the actions being taken to address the risks of modern slavery practices in the College's operations and supply chains.

- Given 2025 represents the College's first Modern Slavery Statement and the first time we have used the iPRO platform to conduct our assessments and due diligence, it is too early to objectively assess the effectiveness of the measures adopted. However, we believe that through a multi-faceted approach of: ongoing risk assessment, benchmarking and the use of KPIs, periodically reviewing associated policies & processes, as well as ongoing supplier engagement and monitoring, that this will be effective in ensuring that the College's exposure to contractors/ suppliers that engage in modern slavery practices is low.
- It should also be noted that we will utilise the benchmarking and KPIs in the iPRO Modern Slavery Assessment Tool on an ongoing basis, to help assess the effectiveness of our actions.

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The main KPIs we are using to benchmark our efforts are the risk scores that are generated as part of the assessment process using the iPRO tool.

Each organisation who completes the assessment questionnaire are assessed and given 2 risk scores.

- Inherent Risk Score
- Unmitigated Risk Score

The Inherent Risk Score measures modern slavery risks that are intrinsic/built-in to the operations of an organisation. This is determined by asking which countries, regions, sectors, and high-risk goods are part of their operations, production, or supply chain.

The Unmitigated Risk Score measures the organisations risk that is still present (remains) after accounting for modern slavery risk controls that have been implemented. This is determined by asking suppliers about the policies, processes, and procedures in place to reduce modern slavery risks.

The College is provided an aggregated risk score of all the assessed suppliers, and we use this aggregated score to measure the risk on an overall supply chain level.

We aim to continuously improve on these KPIs.

As we take actions within our organisation, and with our suppliers, we will be able to assess the effectiveness of our modern slavery action plan to reduce the Unmitigated Risk Score by introducing and/or updating relevant policies and procedures.

We also measure the effectiveness of our engagement with suppliers and will continue to encourage participation in our assessment programme to better identify and mitigate modern slavery risks in our supply chain.

It is noted that the 2025 KPIs are as follows:

Aggregated Supply Chain Risk Scores	
Inherent Risk Score	28.61 / 100
Unmitigated Risk Score	36.15 / 100
While there are no prescribed ranges, a score of < 40 is generally considered low-risk, 40-60 medium risk and then > 60 high risk	

Supplier Assessment Completions	
Completions	148 / 196
Completion Rate	75.5%

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6. Consultation

Apart from Scotch College, which is the main operating entity, the other entities noted in Section 3) College Structure and Operations, do not directly purchase any goods or services nor do they have any employees. However, following consultation, Scotch College submits this Modern Slavery Statement on behalf of itself as well as the other entities.

This Modern Slavery Statement was approved by the College's Council on 29 April 2026.



Mr H Tadgell

Chairman Scotch College Council