



Bacchus Marsh
Grammar

2025 Inaugural Modern Slavery Statement

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An Independent Ecumenical School
for Girls and Boys
Reg. No. 1919
ABN: 24 128 531 078
www.bmg.vic.edu.au

Principal Governing Body Approval

This Inaugural Modern Slavery Statement relates to Bacchus Marsh Grammar (ABN 24 128 531 078) for the reporting period of 1 January to 31 December 2025.

Bacchus Marsh Grammar's School Board, which is the reporting entity's principal governing body for the purpose of the *Modern Slavery Act 2018* ('the Act') approved this Modern Slavery Statement on 26 June 2026.

The contents of this Statement have been reviewed and confirmed as accurate by a duly authorised person, pursuant to the Act's requirement.

This statement is signed by **Diana Taylor AM** in her role as the Chair of the Board, Responsible Member of Bacchus Marsh Grammar's Governing Body on 29 June 2026.

Approval Authority	Chair of the School Board
Approval Signature	 Diana Taylor AM Chair of the School Board Bacchus Marsh Grammar
Approval Date	29 June 2026

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Section 16(1) Reporting Criteria	Part of this Statement where primarily described
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(c) and (d)	2
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1 Our Structure, Operations, Supply Chains

This is Bacchus Marsh Grammar's (also referred to throughout this Statement as "BMG", "we" and "our") inaugural Modern Slavery Statement as a reporting entity under the Act.

For the first time since the Act commenced operation, BMG reached the annual revenue threshold to become a reporting entity in relation to the 2025 calendar year.

1.1 Who we are and what we do

Bacchus Marsh Grammar is an independent co-educational school providing pre-school, primary and secondary education in Victoria, Australia. The School's purpose is to develop students to be respectful, caring and capable of achieving their life goals. The School operates educational, pastoral care, co-curricular, sporting and community engagement programs that support student learning and development.

BMG is a not-for-profit public company limited by guarantee. We are governed by a School Board. The Board comprised 10 directors during the reporting period, including a Chairperson, Deputy Chair and CEO. The directors collectively provide governance oversight, strategic direction and stewardship of the School.

BMG operates from our 3 Victorian campus locations:

- Maddingley Campus – 37 South Maddingley Road, Bacchus Marsh
- Woodlea Campus – 111 Frontier Avenue, Aintree
- Staughton Vale Campus – 155 Staughton Vale Road, Staughton Vale

Through the commitment and service of the 560 dedicated BMG staff members, we educated a total of 3,826 students during the reporting period. The following is an overview of employment types:

Employees	Total Number
Full-time employees ¹	376
Part-time employees	167
Casual employees	17
Total direct employees	560

A further overview of staffing roles for 2025 includes:

Role Type	Total Number
Principal	1
Teaching Staff	368
Specialist Support Staff	28
Building and Maintenance Operations	32
Administrative & Clerical	131

In addition to its directly employed workforce, BMG engages external contractors and service providers to support school operations, including in areas such as building and maintenance works, cleaning, security,

¹ Some BMG full-time positions are on fixed term contracts.

transport, catering, professional services, information technology and other specialist services. BMG does not currently maintain a centralised headcount of individual contractor personnel, as these workers are generally engaged or managed by third-party suppliers rather than directly by BMG. During future reporting periods, BMG intends to improve visibility of contractor and supplier workforce arrangements as part of its developing modern slavery risk management framework.

BMG does not have any owned or controlled entities. All operations, employment and procurement activity is undertaken directly by the reporting entity. Consequently, the inter-entity consultation description required by s.16(1)(f) of the Act for owned/controlled entities is not applicable.

Towards the mid-point of 2025, BMG became aware that it was likely to meet or exceed the Act's revenue threshold for the relevant reporting period. This was identified through ordinary financial reporting and revenue forecasting processes.

BMG's operations occur entirely within Australia.

1.2 Supply chains

BMG's supply chain involved obtaining goods or services from 910 unique 1st tier (direct) supplier companies in the reporting period. As described below, our entire procurement spend for the reporting period has been subject to comprehensive modern slavery risk assessment using the proprietary technology and methodology of external specialist-ESG consultants.

Our Australian-based suppliers provide products and services across the following key categories:

Building and Construction	Computer and related services (including both OT software and hardware)	Other business services (including financial, legal, insurance, and advisory)
School vehicles – including repair, maintenance and fuel	Printed materials and Office supplies	Telecommunication services and Utilities
Professional Recruitment Services	Campus Cleaning & Security Services	Textiles – including staff uniforms

Approximately 98% of our direct suppliers are Australian-based companies, with only 24 international suppliers in our 1st tier.

BMG's direct international supplier base covers the following industry categories:

- Computer and related services
- Educational services
- Research and development services
- Membership organisation services

These service companies are located in Singapore, Hong Kong, the United Kingdom, United States, Canada, and New Zealand.

BMG does not hold any investments in other companies or ventures.

2 Approach to identifying, assessing and addressing modern slavery risk

2.1 Foundational risk identification and assessment

No actual or suspected incidences of modern slavery were reported or otherwise detected in BMG's supply chains or operations during the reporting period.

BMG's foundational process of identifying and assessing potential risk areas commenced in the latter part of the reporting period and is continuing into 2026. It included engaging external subject matter experts, developing an initial policy and governance framework, understanding the most relevant risk areas given our sector and geographical location, and planning for a continuous improvement approach where we build upon longer term initiatives across successive reporting periods.

2.2 Operations

Given that our operations are exclusively within the non-tertiary education sector, are entirely Australian-based and our workforce is predominantly directly employed, BMG assesses our operational modern slavery risk to be, in relative terms, very low.

However, we recognise the reality of modern slavery practices in Australia, including a higher known prevalence in some business activities that support our operations. These include:

- Professional cleaning services
- Campus security services
- Staff uniforms and workwear
- Outsourced canteen and food services
- Building, Repairs and Maintenance
- IT hardware, electronics and technology-related procurement

BMG also utilises reputable Australian external recruitment companies to supplement our inhouse Human Resources team, which is responsible for most new staff recruitment itself. BMG also engages Australian-based IT consultants and technology support providers to support school systems and operations. While we consider the direct risk associated with these professional services to be low, we recognise that technology-related procurement can involve elevated modern slavery risks deeper in ICT hardware and electronics supply chains.

2.3 Supply chains

As noted above, our foundational assessment of modern slavery risk in our supply chains utilised external consultants to conduct a spend-based risk assessment of modern slavery risk in our entire value chain. This is done through proprietary methodology that enables automated and comprehensive classification of BMG's overall procurement spend. Suppliers are classified by sector (industry and country), and sectors are then ordered by risk profile. Sectorial risk is determined by reference to the leading current estimates of modern slavery incidence at national and industry levels, and accounts for both operational and supply chain risk within a particular sector.

The approach we have adopted to identifying and assessing modern slavery risk incorporates a unique supply chain mapping process that is underpinned by a balanced, global Multi-Regional Input-Output (MRIO) dataset. This links supply chain data from 208 countries, and 37,318 unique industry/country combinations. The applied data universe comprises over 35,000 local industries categories, which represents more than 98% of global GDP. The MRIO is regularly updated and draws from the most comprehensive and credible global data inputs available, including the United Nations' (UN) System of National Accounts; UN COMTRADE databases; Eurostat databases; the Institute of Developing Economies, Japan External Trade Organisation (IDE/JETRO); and official statistical data from many national agencies worldwide, including the Australian Bureau of Statistics.

The synthesis of global economic supply chain data is overlayed, via a proprietary algorithm, with the leading research and estimates of modern slavery incidences at the national and industry levels, including the Walk Free Foundation's Global Slavery Index; the International Labour Organisation's Global Estimates of Modern Slavery; official reports published by the United States on International Child Labour, Forced Labour and Human Trafficking, and our internally developed database of modern slavery risk factors by country and sector.

The resulting output from the risk assessment includes a comprehensive breakdown of areas of (relatively) elevated risk in our complete value chain, down to the tenth (10th) tier, grouped on a sector/country basis, and broken down into practical categories such as total overall spend and ranked sectoral risk.

Our inaugural risk assessment identified suppliers in the following Australian industry categories as having the most elevated (in relative terms within our supply chains) areas of potential risk. We have also included a brief description below of the complex and often interconnected factors that may contribute to potential elevated risks, many of which occur deep within the respective supply chains of these suppliers rather than in their direct operations:

- **Construction (building) work and maintenance**

This category includes new building projects for our campuses. It also covers repairs and maintenance suppliers used for the full range of existing facilities.

As noted in Part 1, BMG has a directly employed Building and Maintenance Operations team comprised of 32 individuals. However, our team members also rely on various repair and maintenance suppliers.

Potentially elevated risks within Australia for these sectors are attributable to characteristics such as a relatively higher prevalence of informal worker payment arrangements, relatively low barriers to entry for unskilled migrant workers, routine use of labour hire agencies, and prevailing employment practices such as subcontracting arrangements with relatively low transparency.

The Walk Free Foundation's Updated 2023 Global Slavery Index identifies the construction industry as one of the predominant sectors of forced labour within Australia.

Deeper-tiered supply chain risks relating to building, construction and maintenance activities can also arise in connection with the extraction of raw materials used for common building materials, tools (especially cordless products powered by lithium batteries) and machinery, including common metals (iron, steel, and aluminium), timber products, bricks, concrete / cement, and PVC.

- **Hospitality – including hotel and restaurant services**

This category covers off-site events, catering, conferences and other events involving the provision of food and beverages. Sector-wide factors that can elevate risks with these providers may include reliance upon higher risk services, such as cleaning providers, maintenance, and security staff, with proportionally higher rates of lower skilled and temporary workforces. Catering services rely on products from the relatively higher-risk (within Australia) agricultural and horticultural sectors. These industries feature seasonal, low skilled and migrant workers, often have job sites located in geographically isolated areas and involve hazardous work. There are also issues relating to the misuse of 'piecework' models, where workers are paid per item harvested. Numerous high-risk imported products are commonly used in the commercial catering sector, such as seafood, beef, rice and cocoa.

- **Textiles – staff uniforms**

This category includes our staff uniform providers. Global garment manufacturing is the most widely recognised at-risk sector for modern slavery, from harvesting cotton to manufacturing textiles.

The global textile supply chain is widely recognised as the highest-risk sector for forced labour across all manufacturing industries. Cotton, which is a primary raw material, has been associated with state-sponsored forced labour in China's Xinjiang region. Garment manufacturing in Bangladesh, Cambodia, Myanmar, Vietnam, and India involves workforces that are highly vulnerable to debt bondage, unlawful wage deductions, and restrictions on freedom of movement, particularly in export processing zones.

The universal prevalence of migrant workers in apparel industries, along with typically low skilled positions, and lacking overall supply chain transparency all contribute to the globally elevated risk.

- **Retail trade services (General)**

Office goods and stationary suppliers can be characterised by high-risk inputs such as plastic, timber, rubber, cardboard and paper. These products are often also manufactured overseas in higher risk countries and are produced with minimal 'per unit' profit margins, which increases the potential risks of workforce exploitation.

- **Other business services**

Professional cleaning and security services fall within this broadly defined sector, which carry inherently elevated risks in Australia. Sub-contracting arrangements are virtually universal within the Australian commercial cleaning and security sectors, which poses a higher risk to the principal contractor who may be utilising a sub-contracting model to deliver services. In particular, opaque arrangements of second and third tier contracting increase the potential risk of workers being forced to enter into a contract as an independent contractor, rather than gaining appropriate protection and rights as employees. This practice is known as sham contracting. Migrant workers on temporary visas, such as international students and backpackers, are also relatively prevalent within these industries, and are particularly vulnerable to exploitation.

This category also includes professional service providers, such as consulting firms, accounting, advisory, legal, and engineering firms. The potentially elevated areas of risk associated with the professional services included in this category do not relate to the operations of BMG's direct suppliers. Rather, risks lie predominantly with deep-tiered supply chain characteristics associated with the dominant use of computers, digital devices, software, and other electronics products. The 2023 Global Slavery Index describes electronics as the highest risk product imported into Australia. Within the broad category of electronics, BMG has significant procurement in the area of Information and Communication Technology (ICT) hardware, which refers to the physical devices and equipment (e.g. laptop computers and hard drives) used to create, store, transmit, or manipulate digital information.

Identified risks exist through the manufacturing and assembly aspects of the supply chain, which typically occurs in high-risk countries including Malaysia and China. Elevated risks are present at the raw material extraction phase, including for key component minerals such as cobalt, lithium and gold.

2.4 Building a Long-Term Anti-Slavery Framework

As our first reporting period, our initial focus has been on identifying and assessing potential modern slavery risk, along with the initial development and implementation of policies and procedures to ensure key procurement activities are appropriately addressing areas of potentially elevated modern slavery risk.

Governance & Policy

On 30 April 2025, BMG's School Board approved the foundational aspects of our developing anti-slavery response, including:

- **Modern Slavery Policy**
- **Modern Slavery Implementation Plan, and**
- **Modern Slavery Framework**

These specific measures to address modern slavery risk through an appropriate policy position have been integrated into BMG's existing policy framework, with general protections for all who engage with our community enshrined in our overarching policy suite, including: Procurement and Purchasing Policy, Staff Code of Conduct, Whistleblower Protection Policy, Child Safety and Wellbeing Policy, Complaints and Grievances Policy, Risk Management Framework, and Recruitment & Selection Policy.

BMG is ensuring that our response to modern slavery risk is managed with a "top-down" approach, with ultimate responsibility rests with our School Board, Principal, and Executive Team. In addition to its statutory duty to approve our annual Statement, our Modern Slavery Framework also requires the School Board to:

- endorse and approve relevant policy documents,
- receive reports on supply chain risk assessments, compliance actions, audits and incidents,
- ensure modern slavery risks are included in the risk register, and
- monitor compliance with developing legal obligations relating to modern slavery risk assessment and mitigation.

Our Risk, Compliance and Policy Manager and Chief Financial Officer, have oversight of the School's developing anti-slavery responsibilities, including coordination of BMG's modern slavery risk management approach and annual reporting under the Act.

As BMG's modern slavery framework continues to mature, responsibility for specific activities such as supplier engagement, training, incident response, record keeping and reporting will be further developed and allocated to appropriate staff members and business functions. This will support a practical, coordinated and proportionate approach to identifying, assessing and addressing modern slavery risks across BMG's operations and supply chains.

We recognise that an effective policy and governance response to modern slavery risks should not be "set and forget", and that we are still in the early stages of developing a holistic response framework that will seek to continuously improve over upcoming reporting periods.

Grievance Procedure

BMG's Modern Slavery Policy creates a mechanism whereby any stakeholder can report concerns relating to potential modern slavery practices. We have established an anonymous whistleblower portal and staff incident reporting system.

Our aim is to provide an appropriate grievance procedure that provides accessible and practical means for anonymous reporting, full protection of those who make good faith disclosures, open-door access to designated officers, formal grievance procedures and external reporting pathways.

Aligned with our plans to increase general awareness about modern slavery issues in our community, BMG will continue to promote reporting channels, whistleblower protections and escalation procedures to staff, suppliers, contractors and relevant community members.

3 How we plan to measure effectiveness and develop our anti-slavery response

BMG plans to assess effectiveness through adopting a practical and proportionate approach, including monitoring completion of planned actions, improving visibility of supplier and contractor arrangements, recording supplier engagement or due diligence activities, tracking any reports or incidents, and reviewing progress through Executive and Board governance processes.

As this is BMG's first reporting period, we have not yet completed the development of a formal framework to measure the effectiveness of our newly introduced actions to identify, assess and address modern slavery risk.

During future reporting periods, BMG plans to develop practical measures for tracking, measuring and assessing the actions it takes to mitigate modern slavery risk, across the following key pillars of our overall modern slavery response:

- Policy and Governance
- Risk Assessment
- Due Diligence and External Engagement
- Internal Training and Education

BMG's current plans for the upcoming reporting periods include the continued development and improvement of our anti-slavery response with particular focus on the following areas:

Policy and Governance

BMG plans to continue reviewing and developing its anti-slavery policy framework, including specific anti-slavery provisions in its procurement-related policies. BMG also plans to continue embedding modern slavery considerations into its procurement, risk and governance processes.

BMG will also consider developing a formal roadmap for maturing its modern slavery governance and reporting framework over the reporting periods.

Due Diligence and External Engagement

BMG plans to undertake targeted and contextually appropriate supplier engagement, with risk-based focus on priority areas identified through its initial assessment. These may include Australian construction and building services, campus security and cleaning services, Outsourced canteen and food services, and staff uniforms and technology-related procurement.

As part of this developing approach, BMG plans to consider appropriate supplier due diligence activities, which may include customised supplier self-assessment surveys to target existing suppliers, in order to improve our understanding of current awareness levels of modern slavery issues within our supplier base.

BMG also plans to review procurement processes and standard supplier terms to consider whether express provisions relating to modern slavery should be incorporated.

Capacity Building, Internal Training and Education

BMG plans to continue building internal awareness on modern slavery risks and reporting obligations. In future reporting periods, this may include targeted training or awareness activities for relevant staff and governance



groups, with an initial focus on our School Board, Executive team, Finance team, and staff involved in procurement or supplier engagement.

BMG also plans to continue engaging external subject matter experts where appropriate to support the ongoing development of its modern slavery risk management and reporting framework.