

2021

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 2021 – 31 December 2021.

About us

With 130 years of history, Haileybury is one of the leading independent schools in Australia and the Asia-Pacific region with campuses in Keysborough, Brighton, Berwick, Melbourne (City) and (through a subsidiary) Darwin, 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 second Modern Slavery Statement.

Structure and operations

As indicated above, Haileybury is an independent School for girls and boys with campuses in Keysborough, Brighton, Berwick, and Melbourne (City). 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 Y10 to Y12. Haileybury has a non-controlling share in a joint venture company in China. That company has a Management Agreement with Haileybury Senior School Tianjin. Another school, Tianjin Haileybury Elite International 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 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 within the meaning of the Australian Modern Slavery Act, Haileybury recognises that it has an interest in the school, given it is a part of Haileybury's investments. Haileybury is working to understand, assess and address any modern slavery risks which may be present within the operations and supply chains of the Chinese school.



Supply chains

During the 2021 reporting period, Haileybury engaged with industry experts, Fair Supply Analytics, to undertake extensive supply chain mapping. This process, along with complete reclassification of our suppliers, has enabled a high degree of visibility over our supply chain reaching down multiple tiers, and a robust assessment of our supply chain risk.

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.

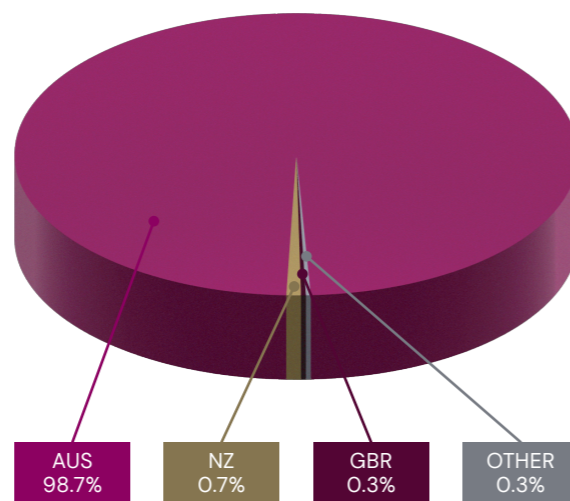


Figure 1: Tier 1 Supply Chain by Country

Approximately 80% of Haileybury's supplier spend during the reporting period occurred in the following categories. This is consistent with the industry-based risk ranking discussed in the next section.

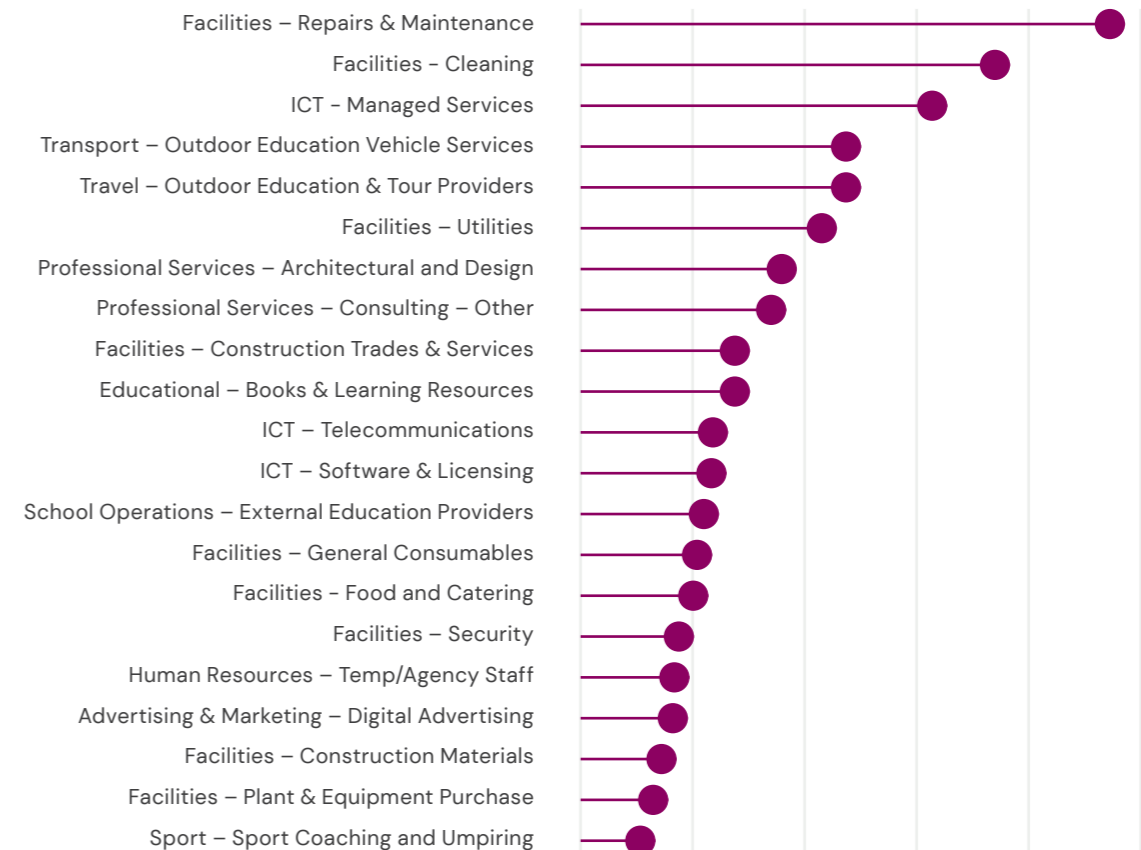


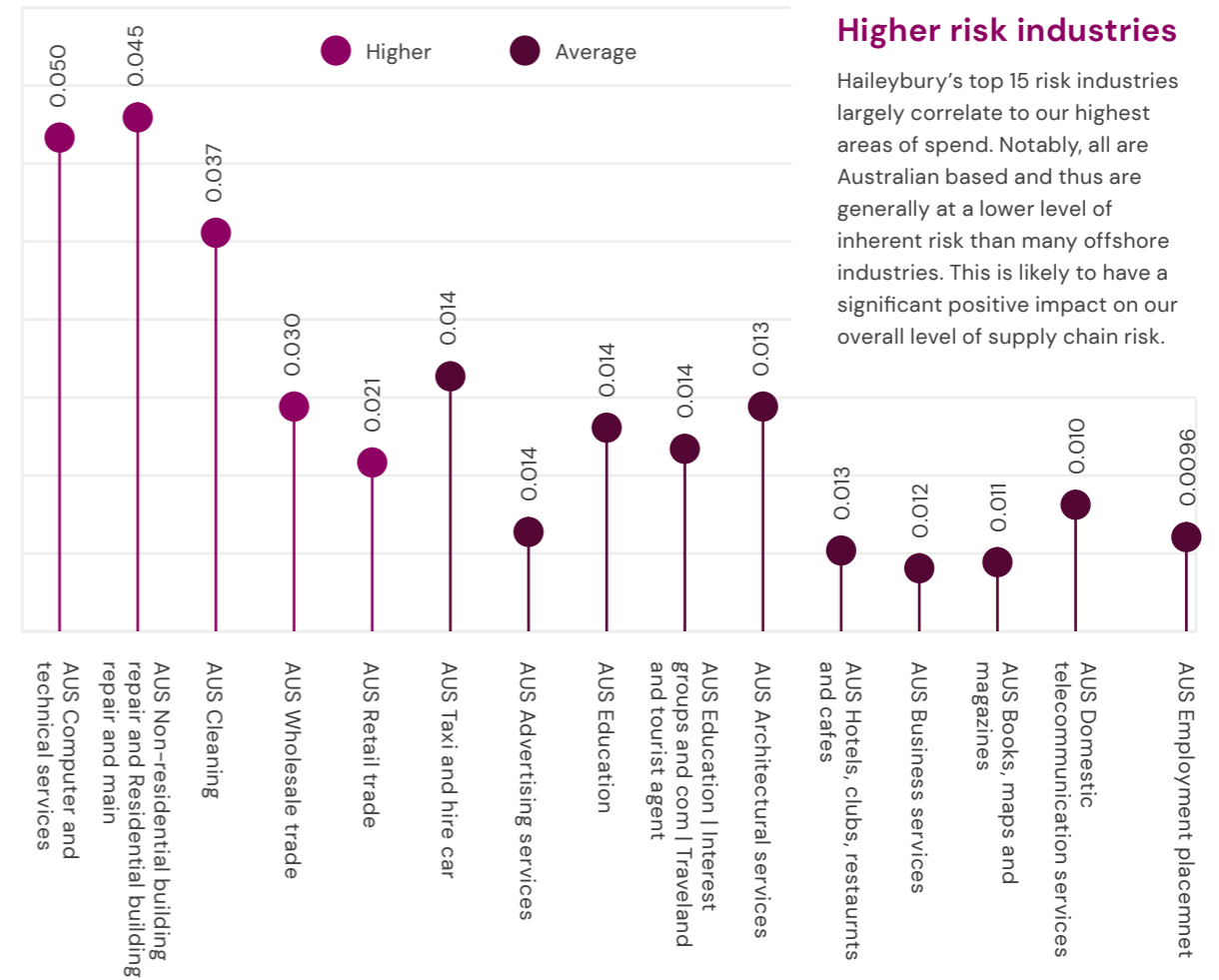
Figure 2: Top 80% of Supplier Spend by Supplier Category

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.

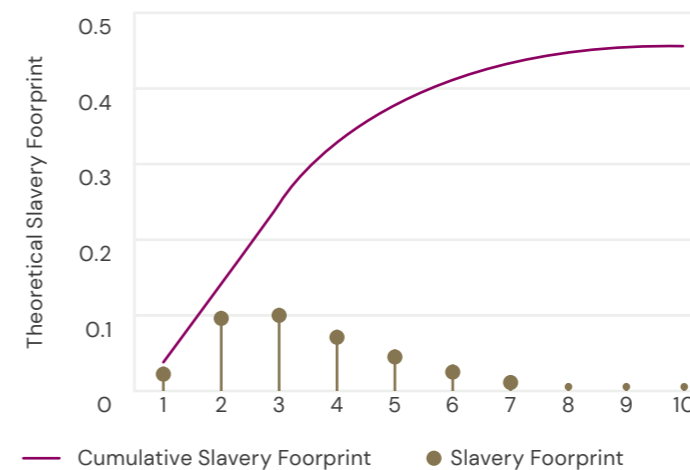
Haileybury’s total TSF for the 2021 reporting period is 0.46. Whilst it is currently difficult to benchmark this figure, we consider this to be a relatively low level of risk given the likely total labour footprint of our supply chain.



Higher risk industries

Haileybury’s top 15 risk industries largely correlate to our highest areas of spend. Notably, all are Australian based and thus are generally at a lower level of inherent risk than many offshore industries. This is likely to have a significant positive impact on our overall level of supply chain risk.

Figure 3: Top 15 Supply Chain Industries by Risk Level



Tiered risk level

Haileybury’s supply chain risk is greatest in Tiers 2 to 5 of its supply chain. This is reflective of several key factors:

- > Our first-tier supply chain is almost completely Australian based where regulation and oversight is high
- > Risk increases as supply chains move offshore, typically at or around Tier 3
- > Even though lower tier supply chains are increasingly likely to be offshore and in higher risk countries, risk level reduces in lower tiers as a result of the diminishing value remaining in the supply chain. on our overall level of supply chain risk.

Figure 4: Theoretical Slavery Footprint by Supply Chain Tier

The focus of risk in the higher tiers of our supply chain means that Haileybury can have a greater impact on risk level through our supplier arrangements and engagement. This will be a significant consideration in the formation of our anti-modern slavery strategies moving forward.



Figure 5: Theoretical Slavery Footprint by Country

Geographical risk

The map above represents Haileybury’s TSF by geographical location. The top 10 countries by risk level are labelled on the map.

Australia ranks highly, predominantly due to the concentration of Haileybury’s Tier 1 supply chain, and therefore spend. The fact that Australia (being an inherently lower risk country) is at the highest risk level for Haileybury is a further indication that our relative risk level is low.

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 26 of Haileybury’s top 50 suppliers by risk level. 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 26 respondents, 23% are reporting entities under the Modern Slavery Act, whilst 73% have stated a moderate to high level of visibility over their supply chains. Haileybury will continue to work with the remaining 24 suppliers to improve the survey response rate.

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

Operational risks

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

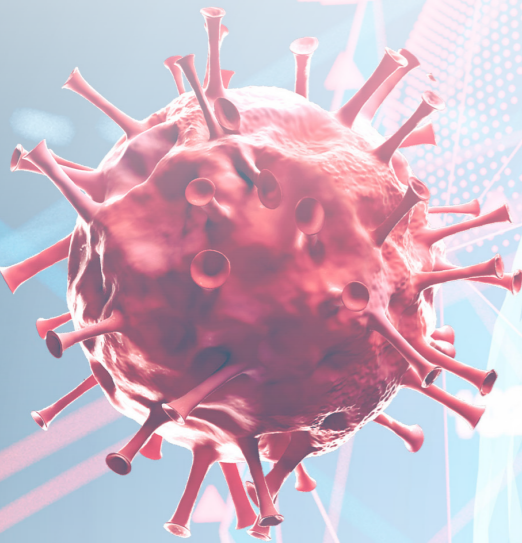
- > Early Learning, including kindergarten, for children aged 3-5 in Australia
- > Schooling for international and local children aged 5 – 18 in Australia
- > Boarding and residential care (via a third-party homestay provider) in Australia for local and international children
- > The Victorian Certificate 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, we will work to influence and ensure a similar ethos within the School’s 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 reporting period, 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 have been developed and embedded into supplier contracts.

During the 2021 reporting period, Haileybury has continued to advance its anti-modern slavery program by:

- > Embedding anti-modern slavery clauses into all new supplier contracts
- > Conducting modern slavery surveys, obtaining responses from a further 20% of its active supplier base
- > Reviewing and recategorising our supplier base
- > Engaging with specialist providers to assist in undertaking detailed mapping and risk assessment of its supply chain
- > Engaging with an experienced consultancy to assist in completing an upgrade of our existing procurement policy and procedure suite.

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.



Reporting and effectiveness

Supply chain risk assessment

During the 2021 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.

Supplier surveys

During the 2020 and 2021 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 2021 reporting period, we have received approximately 400 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 almost all 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 chain.

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. Our 2021 supplier surveys saw a

response rate increase of 63% when compared to 2020, which is an indicator of both greater engagement from suppliers with Haileybury on this issue and a greater awareness of modern slavery more broadly.

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.

A majority 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, Haileybury will establish a 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 policy upgrade project, commenced during 2021, will be completed in due course and updated procurement policies and procedures will be implemented thereafter.

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 28 April 2022. 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

