

SCHOOL Modern Slavery Statement 2024

Introduction

This Modern Slavery Statement submitted by The King's School, pursuant to the *Modern Slavery Act 2018* (*Cth.*) (the Act), addresses the criteria in Section 16 of the Act including describing the current modern slavery risks identified in the School's operations and supply chains and outlining the approach being taken by the School to ensure it has the framework, policies and practices to assess and address those risks.

The School recognises that modern slavery may occur in many forms and acknowledges the impact that commercial activities (including activities in the not-for-profit education sector) can have on vulnerable people through modern slavery practices both in Australia and overseas. These practices may include slavery and other forms of human servitude such as human trafficking, forced marriage, forced labour, debt bondage, and child labour, as well as deceptive recruiting for labour or services.

The School is committed to, and acknowledges its role in working towards the eradication of modern slavery practices from its operations and supply chains, and the minimisation of modern slavery practices within Australia.

About The King's School

The Council of the King's School (operating as The King's School) is Australia's oldest independent school. Founded in 1831 by the command of King William IV of England, King's was established as an Anglican boys' school that would provide Australia with its next generation of leaders, through a community-centred ethos of humility and service.

Our School Motto

The motto of The King's School is *Fortiter et Fideliter*, which translates to "bravely and faithfully". This motto encourages students to be brave learners, take risks, and learn from failures, fostering resilience and preparing them to be global leaders.

Our Mission

The King's School is a Christian community that seeks to make an outstanding impact for the good of society through its students, and by the quality of its teaching and leadership in education.

Our Values

Our values are a frame of reference and the core of what it means to be a person of character. They are our beacon for behaviour and interaction, culminating in a desire to lead with service to the community.

Our School values are: Humility; Honesty; Respect; Responsibility; Integrity; Compassion; Excellence; Gratitude.

Structure and Operations

Reporting Entity

This Modern Slavery Statement (Statement) has been prepared by The Council of the King's School and covers the activities of The King's School (ABN 24 481 364 152) for the calendar year 2024.

The Council of The King's School also elects the boards of the following three entities:

- The Tudor House Foundation Limited
- The King's School Foundation Limited

Futter Park Limited

Structure and Operations

The Council of the King's School is the Governing body of the School, and the Headmaster is the head of the School's operations.

Under the Headmaster are two executive bodies:

1. The Office of the Headmaster, comprising:

- Headmaster
- Director Office of the Headmaster
- Director People and Culture
- Finance Director
- Director of Continuous Improvement
- Director Knowledge Services
- General Counsel and Company Secretary

2. Core School Executive, comprising:

- Headmaster
- Director Office of the Headmaster
- General Counsel and Company Secretary
- Deputy Headmaster and Head of Senior School
- Head of Tudor House
- Head of the Preparatory School

The King's School is registered and accredited by the NSW Education Standards Authority and the International Baccalaureate Organisation to provide education for students and is committed to delivering a strong academic program, wide range of co-curricular activities, and with an emphasis on character development.

The School's main campus is 320 acres in North Parramatta with a Preparatory School (Early Learning to Year 6) and Senior School (Years 7 – 12) for day and boarding students.

Tudor House is the School's Southern Highlands campus, on 160 acres, with boys and girls enrolled in Early Learning to Year 6 including boarders from Year 3 onwards.

Risks of Modern Slavery in Our Operations and Supply Chains

The School has commenced an assessment of its operations and supply chains to evaluate the risks of modern slavery.

The School has not had a modern slavery issue or breach identified in its operations or supply chains but it is committed to ensuring that all its employees have access to the resources and support necessary to report modern slavery practices should they arise.

Operations Risks

There is a negligible risk of modern slavery in the School's internal operations based on its employment framework which includes:

- People and Culture policies and procedures that support operational recruitment and ongoing employment practices;
- detailed and robust Staff Code of Conduct;
- Mandatory employment screening practices and verification of right to work in Australia for all employees;

 Industrial regulations (awards, agreements, employment contracts) that govern employment relationships within the School.

The School has commenced consultation with other PCBU¹s which contribute to our operations to assess their (anti) Modern Slavery compliance and practices.

Supply Chains Risks

The School recognises that it may be linked to a higher risk of modern slavery through its supply chains. While the School cannot control activities outside its own organisation, including the possibility where some suppliers operate in countries where modern slavery risks are high, it is working towards putting in place appropriate controls to evaluate and mitigate supply chain risks.

In assessing the risk of modern slavery practices within supply chains, several factors were considered, including:

- Geography;
- Industry practices
- Labour status

Based on these factors the School recognises that modern slavery risk may exist in the following supply chains and have begun an assessment:

Supply chain	Potential Modern Slavery Risks and Preliminary Assessment (ongoing)	
Food Services	The School's food services are provided under contract by a third party. This third party has an extant Modern Slavery Policy and a published Modern Slavery Statement, indicating a low risk and standard high degree of compliance.	
ICT services and supplies	The School's main provider of hardware has an extant Modern Slavery Policy and a published Modern Slavery Statement. At this stage software providers are under ongoing review regarding modern slavery risks.	
Uniform supplies	The School is conducting an assessment of providers and their supply chains to determine the level of risk and mitigation strategies	
Cleaning services	The School's newly-appointed contractor demonstrated during the tender process an ongoing commitment to provide goods and services in a manner that complies with the requirements and provisions of the Modern Slavery Act 2021. Where the contractor uses a sub-contractor in the delivery of services, they shall take all reasonable steps to ensure that the sub-contractor is also fully compliant with the requirements of the Modern Slavery Act 2021.	
Security Services	The School is assessing providers and their supply chains to determine the level of risk and possible mitigation strategies.	
Grounds and building maintenance	The School's grounds, building and maintenance workers are employed directly by the School and subject to our comprehensive employment and screening policy and procedures. Where the School does engage contractors, it is investigating their supply chains to determine the levels of risk and mitigation strategies.	
Investment	The School Council, the Tudor House Foundation and The King's School Foundation invest funds through the assistance of the "Investment Management Committee" (IMC). In accordance with the Investment Policy Statement (settled by each of those entities), the IMC invest funds through various vehicles, some of which may be vulnerable to modern slavery risks.	

An assessment will be undertaken to assess if the Investment Policy should be amended regarding modern slavery risks

Actions to Mitigate Modern Slavery Risk

The King's School recognises that a multi-stage approach is needed to address or mitigate any potential modern slavery risk and related issues within its operations and supply chains.

The School's multi-stage process includes:

a) Risk Review and Assessment

- Identification of high-risk goods and services;
- Review of School employment and procurement policies and procedures;
- Engagement with key suppliers regarding modern slavery risks.

b) Development of Policies and Procedures

- Drafting and adoption of Anti Modern Slavery Policy;
- Drafting amendments to procurement policies and processes;
- Consideration of amendments to the School's Investment Policy;
- Inclusion of modern slavery considerations and terms into School tender documents and contracts.

c) Implementation and Supplier Engagement

- Adoption / publication of the Anti Modern Slavery Policy and procurement policy;
- Trialling of a Modern Slavery Supplier Assessment Tool;
- Provision of education / training regarding modern slavery to staff;
- Inclusion of a modern slavery screen as part of our procurement process;
- Inclusion of modern slavery compliance tasks in the School's Compliance platform.

d) Monitoring and Control

- Regular review and monitoring of supply chains including periodic audit;
- Periodic assessment of the effective implementation and operation of the amended policies, processes and procedures and related contract documentation;
- Reporting to the Risk, Governance and Compliance Sub-Committee of the School Council.

Strategy Schedule

Strategy	Scheduled for completion
Risk Review and Assessment	July 2025
Development of policies and procedures	October 2025
Implementation and Supplier engagement	January 2026
Monitoring and Control	January 2026

Assessing the Effectiveness of the School's Actions

For the *Risk Review and Assessment* and *Development of Policies and Procedures*, the School is relying on previous policy records, documents, and consultation with key personnel to ensure practicable, compliant policies can be developed. Dedicated Risk and Compliance personnel have been allocated to prepare and guide the process of developing, implementing and controlling modern slavery risks.

Consultation

Consultation has been undertaken with key persons associated with procurement at the School, as well as with key providers in supply chains subject to modern slavery risks.

As we progress through the implementation stages consultation will be extended to more suppliers and to all staff.

Approval

This Statement was approved by the Council of The King's School on 12 June 2025 in its capacity as the governing body of The King's School. This Statement is signed by Mr K M Chapman in his role as the Chairman of Council and Mr A L George as the Headmaster of The King's School.

Signed:

Signed by:

20 June 2025 92CEF53B6BE74D4... Date

Mr A L George

Headmaster, The King's School

0B1B700D514342B... Date

DocuSigned by:

. 19 June 2025

Mr K M Chapman

Chairman, Council of The King's School