

Barker College Modern Slavery Statement 2025

About this Statement

This Modern Slavery Statement (**Statement**) has been prepared in accordance with the requirements of the Australian Modern Slavery Act 2018 (Cth) (**Act**).

This Statement describes our approach and actions to manage Modern Slavery risks in our operations and supply chains during the financial year ending 31 December 2025 (**Reporting Period**), as well as our plans for future improvements.

We understand the intersecting risks of slavery and human trafficking within our industry and remain steadfast in our efforts to combat these crimes. Our approach includes raising awareness, protecting vulnerable populations, and continuously enhancing our processes to identify and mitigate modern slavery risks.

We recognise that Modern Slavery may occur in many forms here in Australia such as slavery, servitude, human trafficking, forced marriage, forced labour, debt bondage, child labour, and deceptive recruiting for labour or services. We further recognise our obligation to exercise our responsibility to help minimise Modern Slavery practices in Australia.

Finally, the concern surrounding modern slavery is aligned with Barker's ongoing and existing commitment towards social responsibility and environmental sustainability. The Council of Barker College will continue to demonstrate strong leadership to direct the School as it navigates through its ESG journey with our Modern Slavery Statement representing the Social element of the ESG Program, amongst other ESG initiatives

About Barker College

Aligned with Australian Modern Slavery Act 2018

Founded in 1890, Barker College is an Anglican coeducational independent School on the upper north shore of Sydney, NSW. It operates two indigenous primary school campuses on the Central Coast of NSW and a campus in the Northern Territory of Australia and a Special Assistance School for students with a refugee background. The unique Barker College student experience is therefore one that offers academic care with a global vision and awareness that inspires hope.

The School caters for students from Pre-Kindergarten to Year 12 and offers boarding for Senior School students in Years 10 – 12. All students are exposed to a range of diverse opportunities and experiences.

Students are immersed in holistic learning experiences, Wellbeing is carefully considered and integrated into academic learning, outdoor education, service learning, Connect Groups, the pastoral care House system, co-curricular programs such as dance, robotics and Cadets, sports, student academic care and support, and through Christian faith development.

Barker College operates a number of Environmental, Social and Governance (ESG) programs. These include, but are not limited to, Indigenous education delivery and On Country learning, Service Learning, and a student-led environmental initiative called Footprint, which evaluates and reduces our carbon footprint. We also offer a suite of education access and equity opportunities under the Humanitarian Program for refugee students and their families. Additionally, our senior school Social Service Captains represent the student voice in ESG efforts, highlighting the role of student leadership in a non-tertiary education context. As part of our ongoing commitment to sustainability, we are aiming to become Australia's first certified Sustainable School in Term 3, 2025, supported by our Sustainable Energy Commitment.

Our School Motto

Honor Non Honores in translation Seek Honour Above Rewards

Our Mission

An Anglican community inspiring every learner, every experience, every day.

Our Vision

To be the leader in Christian education characterised by a global vision that inspires hope.

Our Values

Commitment, Compassion, Courage, Integrity, Respect.

Barker College is committed to introduce a well-defined Modern Slavery risk management process, ensuring a qualitative review of the potential Modern Slavery risk across its operations and supply chain. We have:

- Performed a detailed assessment of our suppliers through a comprehensive risk assessment methodology that includes indicators that identify a potential Modern Slavery risk across our operations and supply chain, which are split across:
 - Geographic risks: regional and country risks
 - Category risk: products and services
 - Business model risk: type of business model
 - Salient risk: vulnerable populations
- Conducted a completeness check of all our policies, procedures, and guidelines to identify how these can be further strengthened to identify and eliminate Modern Slavery risks across the operations.
- Disclosed specific Modern Slavery risks and the actions within our global supply chain.
- Defined the effectiveness of our actions.

Our operations

The key activities of the School are the provision of Kindergarten, Primary and Secondary education which are conducted in four New South Wales campuses, one Northern Territory campus and an outdoor education campus, the Grange.

Our organisational structure

The Council of Barker College is the governing body of the School and the Head of Barker College is the head of the School's operation. Under the Head of Barker College, there are six head divisions that run the School's operation namely, Chief Operating Officer, Deputy Head Student Experience, the Deputy Head People and Culture, the Head of Junior School and Indigenous Schools, the Head of Middle/Senior, and the Director of Marri Mittigar the Humanitarian School.

Reporting entity

This Modern Slavery Statement (Statement) has been prepared by The Council of Barker College (The Council of Barker College Incorporation Ordinance 1939) (The Council of Barker College) and covers the activities of Barker College (ABN 18 620 620 356 and Barker College Ordinance 1919 and The Barker College Ordinance 1978) (Barker College) for the calendar year 2025.

Our supply chain

For the Reporting Period, Barker College's supply chain comprises of the following categories:

- Travel expenses
- ICT;
- Construction services
- Cleaning services;
- Security services;
- Food services;
- Co-curricular; and
- Equipment and consumables

During FY25, our major suppliers were domestic with a local subsidiary or primary base in Australia.

Modern Slavery governance and reporting

The Council of Barker College has ratified the inclusion of Modern Slavery risk and compliance under the Commonwealth *Modern Slavery Act 2018* into our 2025-2026 Compliance Framework.

The incorporation of Modern Slavery risk controls and compliance into our frameworks, ensures that Modern Slavery risk is evaluated, monitored and reported on routinely and with the highest level of organisational oversight.

Modern Slavery Screening in Procurement

In the prior reporting period, Barker College introduced modern slavery screening into its procurement processes as part of its broader risk management framework.

During that period, the School completed two major procurement activities relating to the appointment of a security services provider and an ICT (Information and Communication Technology) provider for the Digitisation Project. As part of these processes, the School implemented a Modern Slavery Risk Questionnaire, developed by the Risk and Compliance team to support the identification and assessment of potential modern slavery risks across prospective suppliers.

The questionnaire was structured across four key categories:

1. working conditions
2. workforce profile and statistics
3. business integrity; and
4. governance and management responsibility

The introduction of this screening process strengthened the School's ability to assess suppliers against defined risk criteria and form a more informed view of their practices. It also supported the evaluation of alignment with Barker College's values and modern slavery expectations when selecting new suppliers.

Each of the categories were designed to capture the different risk elements of Modern Slavery that may exist in a particular supply chain.

Working Conditions: This category assessed whether suppliers had appropriate policies and procedures in place to prevent forced labour, human trafficking and other forms of modern slavery within their operations and supply chains. It also considered workplace health and safety practices, compliance with local labour laws (including working hours), and the existence of policies such as Indigenous procurement frameworks.

Workforce Profile and Statistics: This category captured information on workforce composition, including the use of migrant labour. This enabled the School to assess potential risk factors associated with vulnerable worker groups, including risks relating to visa arrangements, remuneration practices, working conditions and hours. Higher reliance on migrant or low-skilled labour was considered an indicator of increased inherent risk.

Business Integrity: This category assessed alignment with Barker College's expectations in relation to ethical business conduct, including anti-bribery and conflict of interest practices relevant to procurement activities.

Governance and Management Responsibility: This category evaluated the extent to which suppliers demonstrated accountability for compliance with applicable laws and regulations, including employment, labour and corporate requirements, as well as their oversight of suppliers within their own supply chains.

In addition to completing the questionnaire, prospective suppliers were required to provide relevant policies and supporting documentation (such as procurement policies, supplier codes of conduct and internal governance frameworks). The existence, quality and completeness of these materials—particularly those addressing modern slavery risks—were considered as part of the overall procurement assessment.

Barker College Modern Slavery risks

Barker College has conducted further assessment of its operations and supply chains, incorporating all of the entities that the School controls, to evaluate the risk of modern slavery practices.

The School remained free of Modern Slavery incident or breach

Barker College undertook further review of selected suppliers' procurement and operational policies to assess their level of awareness of, and approach to managing, modern slavery risks.

These activities built on the initial risk assessment conducted in the prior reporting period and reflected a continued focus on strengthening the School's understanding of supplier risk across its operations and supply chain.

As part of this approach, the School developed and implemented a Modern Slavery Risk Questionnaire for prospective suppliers. The questionnaire was designed to support the assessment of supplier risk, awareness and compliance with relevant modern slavery requirements, and to promote greater transparency in supplier practices.

This approach demonstrates the School's commitment to working collaboratively with its suppliers to identify, assess and address modern slavery risks.

Barker College will continue to reinforce its expectations in relation to modern slavery with its business partners and maintain a focus on addressing these risks across its operations and supply chain.

In our operations

Based on this assessment we are confident that our Modern Slavery risk remained low in our operations.

This is due to the direct employment relationship between the School and its teaching and non-teaching staffs. Our School has strong employment policies based on the existing Australian employment laws, awards, and other regulations within the sectors.

In our supply chain

In assessing the risk of Modern Slavery practices within our supply chain, several factors were considered, including:

- supplier importance,
- customer interaction/ impact,
- spend (leverage),

- risk to people/ salient risk,
- geographic impact,
- industry/ sector risk; and
- business model.

We have identified the following areas of potential Modern Slavery Risks:

- Travel expenses: Where travel-related services are procured (including accommodation, transportation, and associated services), the School recognises potential modern slavery risks within global travel supply chains. We will work with approved travel providers and budget holders to assess supplier practices and identify the level of risk, with further due diligence and mitigation strategies to be implemented as required.
- ICT: Our information technology workers are directly employed by the School and are subject to our comprehensive employment policy. Key suppliers supporting ICT services, including records digitisation, have Modern Slavery policies and published Modern Slavery Statements, indicating a low risk and a standard-high degree of compliance with the Act.
- Construction services: Where the School engages third-party contractors for construction projects, including capital works and refurbishment activities, this sector may involve elevated modern slavery risks, particularly due to subcontracting and labour hire arrangements. The School undertakes due diligence on contractors and their supply chains to assess risk levels and implement appropriate mitigation strategies.
- Cleaning services: The supplier for this service has an existing Modern Slavery policy and a published Modern Slavery Statement, indicating a low risk and a standard-high degree of compliance with the Act.
- Security services: The supplier for this service demonstrated, through the procurement process, the existence of a Modern Slavery policy and a published Modern Slavery Statement, indicating a low risk and a standard-high degree of compliance with the Act.
- Food services: Our cafeteria workers are directly employed by the School and are subject to our comprehensive employment policy. At this stage, the origin and risk of the food products are under ongoing review and are subject to our procurement processes.
- Co-curricular: Our sports coaches are directly employed by the School, and our visiting music tutors operate as contractors in accordance with our employment and contractor policies. Where the School engages third-party suppliers for these programs, we assess their supply chains to determine the level of risk and appropriate mitigation strategies.
- Equipment and consumables: Where equipment and consumables are procured across the School's activities, we work with budget holders to determine the level of risk and appropriate mitigation strategies.

Based on the factors above, we recognise that Modern Slavery risk may exist in the following areas within our supply chain, and the risks are nonetheless under control or reasonably mitigated

Actions to assess and address Modern Slavery risks

Assessing our Modern Slavery risks

We have conducted our Modern Slavery risk assessment for the reporting period. We have analysed our supply chain data using a data analytics tool and performed a comprehensive review of our operations, including our policies and procedures. Additionally, we included interviews with key stakeholders.

No instances of Modern Slavery have been identified during the Reporting Period.

We are committed to continually improving our understanding of Modern Slavery risk exposure and will adapt our risk management approach, measurement of effectiveness, and actions accordingly.

Actions to address Modern Slavery risks

Barker College is committed to fostering a safe, ethical, and socially responsible environment. All processes, policies, guidelines, and reporting mechanisms have been developed with a strong emphasis on identifying and managing risks related to Modern Slavery. In line with Barker College's culture of continuous improvement, it has become clear that effectively addressing Modern Slavery within Barker College requires a comprehensive approach—one that includes prevention, early detection, effective response, and clear accountability. The following actions have been identified to strengthen Barker College's efforts in mitigating modern slavery risks:

Governance and policy

Barker College maintains a strong governance and policy framework that guides ethical conduct and compliance with applicable laws and standards.

The College continues to embed Modern Slavery considerations across its governance and policy framework to support a consistent and accountable approach:

1) Policy Integration:

Modern slavery risk is addressed in key policies including:

- Staff Complaints Policy
- Child Protection Policy (published on the College's website)
- Student & Parents Complaints & Feedback Policy (published on the College's website)
- Whistleblower Policy
- A 24/7 confidential third-party platform (WHISPLI) for anonymous and whistleblowing complaints
- Procurement Policy (subject to periodic review)
- Child Protection Policy for Marri Mittigar Humanitarian School

2) Compliance Program:

- Inclusion of the Modern Slavery Act 2018 (Cth) in the School Council's compliance monitoring program
- Agenda item for the Governance, Risk & Compliance Committee
- Use of Thomson Reuters legal and regulatory database to monitor legislative changes and emerging best practices

Our people

Barker College fosters a culture of ethical awareness and continuous improvement among staff:

- Executive Risk Register: Modern Slavery is identified as a key risk under Human Resource Management, with defined controls and treatments in place
- Internal reporting mechanisms: Staff are supported by clear pathways to raise concerns through formal policies and internal channels.
- Community, staff and the public can raise concerns anonymously via the email link to WHISPLI on our website.

Our suppliers and supply chain

The College actively manages supply chain risks through due diligence and procurement practices:

- Cleaning services: Suppliers are subject to Modern Slavery due diligence processes, including policy review and contractual protections to mitigate risks such as exploitative labour practices
- Technology procurement: The use of third-party providers, including leasing arrangements, introduces reduced visibility over downstream supply chains, which is recognised and monitored as a potential risk area.

Training and awareness

Barker College is committed to raising awareness and contributing to broader social impact:

- Education access: Through the Marri Mittigar Humanitarian School, the College supports refugee children from regions affected by conflict and exploitation, helping to reduce vulnerability to Modern Slavery risks
- Ongoing awareness: A continuous improvement approach is applied to the identification, assessment, and management of Modern Slavery risks across the College.

Expanding the mandatory reporting criteria:

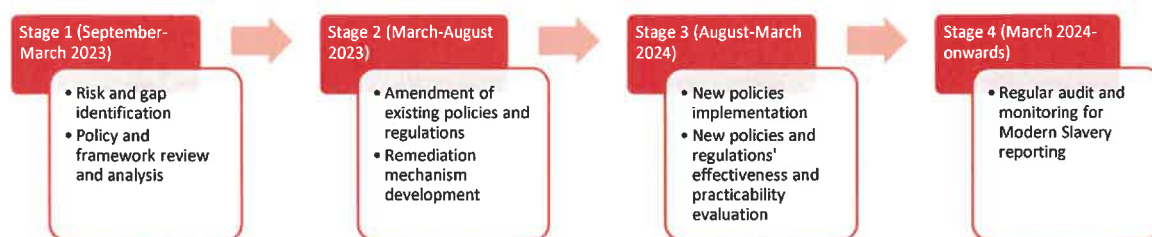
The Australian Government has indicated an intention to expand mandatory reporting criteria under the Modern Slavery Act to include more detailed disclosures regarding products, services, and suppliers—particularly those associated with higher-risk regions. This is intended to enhance transparency and support entities in identifying and addressing potential Modern Slavery risks within their supply chains.

Based on the College's current risk assessments and due diligence processes, no instances of Modern Slavery have been identified within operations or supply chains during the reporting period.

The College remains committed to continuous improvement in its due diligence processes. In anticipation of evolving reporting requirements, supply chain and procurement practices will continue to be reviewed and enhanced. Any material risks or findings identified in future reporting periods will be appropriately addressed and disclosed.

Continuous improvement roadmap

As outlined in previous years, the College maintains a structured roadmap to guide its Modern Slavery response. The College is currently progressing through an advanced implementation stage, reflecting ongoing efforts to embed Modern Slavery risk management into governance, operations, and procurement practices, and to drive sustainable, long-term improvements.



Assessing effectiveness and looking ahead

Assessing effectiveness of our actions

The College assesses the effectiveness of its Modern Slavery response through ongoing monitoring of governance processes, risk management practices, and stakeholder engagement. The following reflects an assessment of key actions undertaken during the reporting period:

Area - Actions undertaken	Assessment of effectiveness
Governance	Governance measures continue to support accountability, with policies outlining clear expectations and responsibilities. Modern Slavery considerations are embedded within key policies (including complaints, whistleblower, and child protection frameworks) and governance processes. Oversight is supported through inclusion in the School Council compliance monitoring program and ongoing review through Governance, Risk & Compliance Committee agendas. The transition to the Thomson Reuters legal database has also supported improved access to current legislative developments and better-informed governance practices.
Our people	The inclusion of Modern Slavery within the Executive Risk Register has increased visibility at leadership level and supports ongoing monitoring of risk. Established reporting mechanisms, including formal complaints processes and whistleblower channels, provide staff with clear pathways to raise concerns, supporting a culture of accountability and transparency.
Our suppliers and supply chain	Supplier due diligence and procurement controls support the identification and management of potential risks. Existing practices include supplier screening and contractual considerations for key services. Initial steps toward strengthening supplier oversight have commenced, including the development of supplier listings to improve visibility of supplier information (e.g. country of origin) and support risk-based assessment of the supply chain.
Training and awareness	Awareness initiatives, including those linked to the Marri Mittigar Humanitarian School, support broader understanding of Modern Slavery risks within the College community. Ongoing communication and integration of Modern Slavery considerations within governance and operational processes contribute to maintaining awareness across the organisation.
Sustainability	Modern Slavery considerations are aligned with the College's broader ESG framework, particularly within the 'Social' pillar. This supports a consistent and organisation-wide approach to

Looking ahead

Barker College remains committed to continuous improvement in its approach to identifying, assessing, and addressing Modern Slavery risks. The following priorities reflect both ongoing initiatives and areas where further development is planned:

- **Enhanced supplier visibility and risk assessment:**

The College will continue to strengthen its supplier due diligence processes, including completing and maintaining a structured supplier listing with key information such as country of origin. This will improve the College's ability to identify higher-risk suppliers and prioritise due diligence activities.

- **Targeted due diligence on high-risk suppliers and labour practices:**

Building on existing procurement controls, the College will undertake more structured due diligence on material and higher-risk suppliers, including third-party labour providers and contractors. This includes a focus on recruitment practices and labour sourcing arrangements.

- **Supply chain expansion and emerging risk areas:**

As new activities are incorporated into the College's supply chain (e.g. logistics partnerships and specialised programs), these will be assessed to determine potential Modern Slavery risks and appropriate mitigation strategies.

- **Policy reviews and ongoing integration:**

The College will continue embedding Modern Slavery considerations across its existing policy suite. Key policies, including the Procurement Policy, will be subject to periodic review to ensure alignment with evolving expectations and regulatory requirements.

- **Integration under ESG framework:**

Modern Slavery will continue to be addressed under the 'Social' pillar of the College's ESG Program, consistent with its ESG Statement of Commitment. This supports a whole-of-organisation approach aligned with the College's values and broader sustainability objectives.

- **Training and capacity building:**

The College will further develop internal capability through targeted training initiatives for key governance bodies, executive leadership, and relevant staff. This will support greater understanding of Modern Slavery risks and strengthen oversight and response mechanisms.

- **Sustainability and certification initiatives:**

The College is progressing broader ESG commitments, including sustainable energy initiatives and potential external certification. These efforts support responsible operational practices and reinforce the College's commitment to ethical and sustainable outcomes.

- **Continuous monitoring of regulatory developments:**

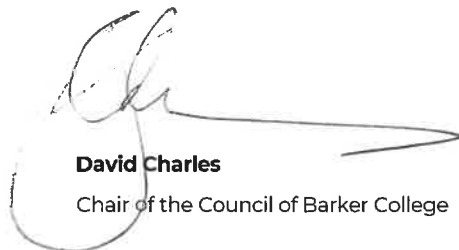
The College will continue to monitor legal and regulatory developments using its legal research platforms and governance processes, ensuring its approach to Modern Slavery remains aligned with emerging requirements and best practice.

Consultation and Approval

Barker College consulted with all the operational campuses in Australia and surveyed current procurement practices. This Modern Slavery Statement was approved by The Council of Barker College in its role as principal governing body on 12 June 2026.



Phillip Heath AM
Head of Barker College



David Charles
Chair of the Council of Barker College