



KNOX
GRAMMAR
SCHOOL

MODERN SLAVERY STATEMENT 2024

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MODERN SLAVERY STATEMENT FOR 2024

INTRODUCTION

This is the third Modern Slavery Statement submitted by Knox Grammar School (Knox / the School / we) pursuant to the Modern Slavery Act 2018 (Cth.) (the Act).

This Statement addresses the criteria in Section 16 of the Act including describing the current modern slavery risks identified in our operations and supply chains and outlining the approach being taken by the School to ensure we have a framework, policies and practices to assess and address those risks.

We recognise that modern slavery may occur in many forms and acknowledge the impact that commercial activities (including our activities in the not-for-profit education sector) can have on vulnerable people through modern slavery practices both here 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.

We are committed to, and acknowledge our role in, identifying and working towards the eradication of modern slavery practices from our operations and supply chains and the minimisation of modern slavery practices within Australia.

This commitment is one aspect of a broader commitment to social responsibility and environmental sustainability.

ABOUT KNOX GRAMMAR SCHOOL

Our Story

Founded in 1924, Knox Grammar School is a Uniting Church School. Knox is an independent (mostly) boys school in the upper northern suburbs of Sydney, NSW. It operates two Preparatory School campuses (one a co-educational campus) and a Senior School campus in the suburbs of Warrabee and Wahroonga. The School caters for students from Pre-Kindergarten to Year 12 and offers boarding for Senior School students in Years 7-12. All students have access and are exposed to a diverse range of educational and developmental opportunities and experiences.

In educating Knox students, we seek to develop their character and confidence. We teach them to value commitment, to actively recognise and reward those endeavours and character dispositions which lead to wellbeing and personal success, to encourage innovation and to foster valued School traditions. Our aim is to prepare students for a successful life beyond their school years and to help them become valuable, responsible and contributing members of the wider community. At the core of our Positive Education framework is our bespoke Knox Total Fitness Action Model, which focusses on the whole person. Students are immersed in holistic learning experiences where their wellbeing is carefully considered and integrated into academic (curricular) and co-curricular learning, including outdoor education, service learning, music and other co-curricular programs, and sport. This is underpinned by a model of pastoral care incorporating Mentor Groups, the House system, student academic care and support, and through Christian faith development.

Knox operates a number of Social Justice (or Environmental, Social and Governance (ESG)) programs. This includes, but is not limited to, Service Learning programs and initiatives, Indigenous Education programs and initiatives, including awareness programs for staff, and environmental impact measures, with a focus on recycling, renewable energy and sustainability. Knox also offers education access and equity opportunities for indigenous students.

Our School Motto

Knox's motto is 'Virile Agitur', meaning, the manly (honourable/right) thing is being done.

Our Mission

Being a leading school; highly respected globally for innovation, altruism and a commitment to student and teacher excellence and wellbeing.

Our Vision

To be an exemplary school, developing, within a caring Christian environment, students of faith, wisdom, integrity, compassion and courage.

Our Values

Faith, Wisdom, Integrity, Compassion and Courage.

Our Aims

At Knox, we are committed to:

- Supporting the spiritual growth of each student through Uniting Church faith and leadership
- Developing within each student their self-identity and wellbeing by providing a rich diversity of cultural, sporting, academic and service-learning experiences so they can explore their passions
- Providing an exciting, challenging and enriching curriculum

through which students develop creative, critical thinking, problem-solving and leadership skills in a variety of contexts

- Fostering a culture of serving others and making a difference to the lives of others through social justice
- Developing accomplished, well-resourced and inspirational staff, committed to the students under their care and imbued with a strong ethos of service, professional learning and responsibility
- Creating a safe, caring and inclusive environment that supports an outstanding education for all students
- Maintaining and developing outstanding facilities required to support a high-quality education
- Fostering close, authentic relationships with our parents and the wider community
- Developing key partnerships with alumni, business communities and universities to enrich the education of our students and staff.

STRUCTURE AND OPERATIONS

Reporting Entity

Knox Grammar School (ABN 54 645 113 104) is the reporting entity in connection with this Modern Slavery Statement.

The Knox Grammar School Council is the principal governing body of the School.

Knox became a separately incorporated entity in 2021. Its first full reporting year following incorporation was 2022. This Modern Slavery Statement (Statement) covers the activities of Knox for the calendar year 2024.

Structure

As noted above, the School Council is the governing body of the School. The Council is the descriptive name given to the School's Board of Directors.

The Headmaster of Knox is the most senior employee of the School and is responsible for the overall management and operations of the School. In 2024, the Headmaster led a Senior Executive team, including a Deputy Headmaster and Head of Senior Campus, Heads of the two Preparatory School campuses, a Chief Operating Officer, Chief Information Officer, Deputy Headmaster Academics 7-12, Head of Boarding, Enrolments and Community Engagement, and Chief People and Culture Officer. Together with the Head of Sport, Head of Co-Curricular Operations, Director of Operations and Head of Boarding (House Operations) they jointly ran the School's operations; with the support of campus executive teams at each Prep and other senior managers.

Operations

The key activities of the School are the provision of Kindergarten, Primary and Secondary curricular and co-curricular education, conducted principally in the School's three New South Wales-based campuses. The School also runs an on-campus residential boarding programme for around 200 senior school students.

Supply Chains

The School's main supply chains are listed in the table on page 5.

RISKS OF MODERN SLAVERY PRACTICES IN OUR OPERATIONS AND SUPPLY CHAINS

Knox has assessed its operations and supply chains, to evaluate the risk of modern slavery practices.

In Our Operations

Based on this assessment, we identify a low risk of modern slavery in our internal operations. This is due to a number of factors including: the direct employment relationship between the School and its teaching and non-teaching staff; the direct engagement of peripatetic music tutors and many other individual contractors; the employment laws, enterprise agreements and awards that apply and with which the School is required to comply and the highly-regulated nature of the school education industry, generally, and the independent education sector, in particular. Our School has strong employment policies and practices based on existing employment laws, industrial agreements, awards, and other regulations within the sector.

In Our Supply Chain

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

- Product / service category
- Suppliers that may engage a transient or low skilled workforce.
- Industry practices
- Labour status
- Geography / location

Based on the factors above, we identify that modern slavery risk may exist in the areas within our supply chain set out in the table below.

We have incorporated these matters in the planning for the School's progressive risk mitigation strategy and actions, discussed further below.

SUPPLY CHAIN	POTENTIAL MODERN SLAVERY RISK
Cleaning Services	<ul style="list-style-type: none"> Engagement by contracted service provider of low skilled / migrant workers with poor employment conditions / workers' rights and a restricted ability to bargain; and Possible compensation / debt-bondage situation with their employer (Knox's external contractor)
Catering / Food Services	<ul style="list-style-type: none"> Engagement by contracted service provider of low skilled / migrant workers with poor employment conditions / workers' rights and a restricted ability to bargain; and Possible compensation / debt-bondage situation with the employer (Knox's external contractor) Food products in the cafeteria that are sourced from high-risk countries, with histories of poor labour / workplace legislation / regulation and practices (rice, cocoa / chocolate, tea etc.)
Security Services	<ul style="list-style-type: none"> Engagement by contracted service provider of low skilled / migrant workers with poor employment conditions / workers' rights and a restricted ability to bargain; and Possible compensation / debt-bondage situation with the employer (Knox's external contractor)
Information and Communications Technology Equipment and Services	<ul style="list-style-type: none"> Goods and equipment produced in factories in countries with histories of poor labour / workplace legislation / regulation and practices
Sport and Co-curricular	<ul style="list-style-type: none"> Goods and equipment produced in factories in countries with histories of poor labour / workplace legislation / regulation and practices
Uniforms and Other Sales	<ul style="list-style-type: none"> Goods and equipment produced in factories in countries with histories of poor labour / workplace legislation / regulation and practices
Grounds and Building Maintenance Services	<ul style="list-style-type: none"> Goods and equipment produced in factories in countries with histories of poor labour / workplace legislation / regulation and practices Workers engaged by contractors with poor employment conditions / workers' rights with their employer / principal. For example, work may be subcontracted to third parties resulting in the exploitation of vulnerable subcontractors
Other Equipment and Consumables	<ul style="list-style-type: none"> Goods and equipment produced in factories in countries with histories of poor labour / workplace legislation / regulation and practices

OUR APPROACH TO MODERN SLAVERY – ACTIONS TO MITIGATE MODERN SLAVERY RISK

Knox has adopted a progressive, multi-stage approach to address/mitigate any potential modern slavery risk and related issues within our operations and our supply chain in particular.

This multi-stage approach is outlined below:

1. Identification and Risk Assessment

We have:

- Undertaken a review of existing procurement policies, processes and procedures, and employment practices, through the lens of modern slavery, including identified gaps and areas for improvement.
- Identified high-risk areas in our supply chains. Our identification of goods and services procurement origins is ongoing.
- Engaged (and will continue to engage) with key suppliers with respect to modern slavery risks.

2. Review of Policies and Processes and Planning, including Education and Training

We have

- Reviewed and made amendments to the School's tender / contracting processes and procedures, and to our tender documents and standard terms and conditions, to ensure alignment with the School's position on modern slavery, with a particular focus on:
 - monitoring and seeking assurance from those suppliers where a heightened risk of modern slavery practices may be present, including through utilisation of a modern slavery risk screening tool and supplier self-assessment tool and modern slavery questionnaire
 - seeking to ensure tender documents and contracts used or entered into by the School include provisions / contain conditions addressing modern slavery, where indicated
- Identified amendments to the School's procurement (purchasing policies, processes and procedures and guidelines) to more expressly reference modern slavery considerations
- Sought (and will continue to seek) to raise awareness of modern slavery risks with key stakeholders including staff involved in procurement and current suppliers
- Provided initial information, education and training

regarding modern slavery (both concept and risk) for staff involved in procurement.

- Prepared a Modern Slavery Response Protocol including processes for reporting (notifying) occurrences of modern slavery

3. Implementation and Supplier Engagement

We have

- Implemented the amended procurement processes and tender provisions addressing modern slavery
- Begun assessing new suppliers against modern slavery requirements
- Entered into ongoing consultation and relationship management with suppliers / prospective suppliers.
- Our Operations department, where indicated, is working with certain suppliers to address risks of modern slavery arising. For example, by assisting suppliers to source products with reduced risks taking into account their supply chains and points of origin.

4. Monitoring, Control and Ongoing Improvement

Looking ahead from 2025, we intend to:

- Review and improve the accessibility and utility of existing tools with a view to developing accessible, consistent and repeatable processes and tools, adopted across the entire School, for identifying and assessing modern slavery risks
- Establish clear and appropriate governance structures and cross-functional responsibilities, for modern slavery
- Engage in targeted staff training to build better understanding of and capability in managing modern slavery risks, particularly in procurement
- Review and assess the effective implementation and operation of the amended processes and related tender / contract provisions specifically and the effectiveness of our approach to managing modern slavery risks more broadly

We continue to develop and implement our Modern Slavery Framework establishing the School's processes with respect to modern slavery. This includes further reviewing and updating our existing purchasing / procurement policies, procedures and guidelines, and publicising and inviting feedback on our response protocol and remediation processes.

We recognise that addressing modern slavery risks is an ongoing process, which we are committed to continue to

build upon each year. The timeline below sets out our action plan for the 12 months from January 2025, showing our ongoing commitment to mitigate modern slavery within Knox's operations and supply chain and assess the effectiveness of our actions.

January 2025 – July 2025

Ongoing Risk and Gap Identification, Supplier Engagement

- Ongoing policy and framework review and development; finalising and publishing revised Purchasing Guidelines and Procedures and Response Protocol
- Deeper assessment of supply chains and origin risks, particularly in connection with uniforms/clothing and IT equipment
- Engagement with current suppliers – further awareness raising, ongoing utilisation of existing modern slavery assessment questionnaire

August – December 2025

Supplier Engagement, Information, Education and Training, Monitoring and Control

- Continuing implementation of revised procurement processes and ongoing engagement with suppliers
- Establishment and communication of clear governance structures and cross-functional responsibilities for modern slavery
- Targeted information, education and training for key staff
- Evaluation of practicality, accessibility and effective use and operation, of revised processes and existing tools; consideration of potential improved modern slavery risk management processes and tools and assurance processes
- Development of assurance processes for review, monitoring and periodic audit, of (anti) modern slavery practices.

ASSESSING THE EFFECTIVENESS OF OUR ACTIONS

We have been seeking to develop and implement operationally practicable, effective, processes and related tools aimed at minimising the risks of modern slavery, principally in our supply chains. To date, these have been applied mainly by our Operations Team. This has led to our Operations Team working with suppliers to reduce the risk of modern slavery in their supply chains. We need to ensure the adoption of the processes and tools more broadly across the School. We will continue to work on developing a framework and processes that include the

review and assessment of the effectiveness of the actions we are taking to assess and address modern slavery risks in our operations and supply chains.

Dedicated risk, compliance and operations personnel will prepare and guide the process of development, implementation and control of modern slavery risk mitigation. These staff members will report to the Audit, Finance and Risk Committee of the School Council.

CONSULTATION

Knox does not own or control any other entities. Knox has consulted with its key suppliers and surveyed its current procurement practices.

APPROVAL

This Modern Slavery Statement was approved by the Council of Knox Grammar School on 28 May 2025.

SIGNED



Scott James

Headmaster, Knox Grammar School
25 June 2025



Simon Rothery

Chairman, Knox Grammar School Council
Authorised to sign on behalf of the Council
25 June 2025



**KNOX
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