

2025

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 2024 to 31 December 2024.



About us

Acclaimed as a great private school, Haileybury offers a uniquely rewarding educational experience. Through our innovative approach to teaching and learning, students can discover more, achieve more and become more.

Since 1892, when our doors first opened with five staff and 17 students in attendance, Haileybury has been a centre of continual development: learning, teaching and location have all undergone transformative change on our path to become the School we are today.

The School has enrolments exceeding 7,000 across its campuses and operations in Berwick, Brighton, Keysborough, Melbourne City, Darwin (Northern Territory) and across Southeast Asia in China, Vietnam, the Philippines and Timor-Leste. 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 fifth Modern Slavery Statement.

Structure and operations

As indicated above, Haileybury is an independent School for all genders with physical campuses in Keysborough, Brighton, Berwick and Melbourne (City), and an online campus, Haileybury Pangea. Haileybury has three subsidiaries: Haileybury Foundation, Haileybury International and Haileybury Rendall School, which is based in Darwin. None of these subsidiaries meet 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's operations in Australia is the 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 Years 10 to 12. Another school, Tianjin Haileybury Elite 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 a non-controlling share in a joint venture company in China. That company has a Management Agreement 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 are connected to Haileybury.

Despite not directly managing the schools, Haileybury commits to working with the management in China to investigate and manage any potential modern slavery risks in the operations and supply chains of the Chinese schools.





Supply chains

During the 2024 reporting period, Haileybury continued its engagement with industry experts, FairSupply Analytics, to undertake extensive supply chain mapping.

The vast majority of Haileybury’s Tier 1 supply chain is located in Australia, as represented in Table 1: Tier 1 Supply Chain by Country. This localised supply chain provides Haileybury with a greater level of influence over the practices of its suppliers, which has been a factor in designing our Three-Year Modern Slavery Action Plan, discussed later in this statement.

Country	Percentage of Total Spend
Australia	98.5017%
New Zealand	0.4393%
United States	0.3665%
United Kingdom	0.3502%
Singapore	0.2106%
Philippines	0.0310%
Timor-Leste	0.0257%
Germany	0.0221%
China	0.0184%
Fiji	0.0114%
Ireland	0.0107%
Spain	0.0078%
Canada	0.0032%
Denmark	0.0012%

Table 1: Tier 1 Supply Chain by Country

Approximately 80% of Haileybury’s supplier spend during the reporting period occurred in the following categories. This shows some correlation with the industry-based risk ranking discussed in the subsequent section.

Category	Percentage of Total Spend	Share of estimated people in forced labour	Estimated people in forced labour per \$M	Estimated people in forced labour
Facilities – Construction Trades & Services	24.33%	24.23%	0.928	0.2279
Travel – Outdoor Education & Tour Providers	9.27%	8.33%	0.7798	0.0774
Facilities – Repairs & Maintenance	7.16%	7.59%	1.2313	0.0703
Transport – Chartered Vehicle Services	6.80%	2.16%	0.0138	0.0203
Facilities – Cleaning	5.68%	5.17%	0.12	0.0487
ICT – Managed Services	5.27%	2.34%	0.1256	0.0218
Facilities – Utilities	2.73%	3.21%	0.2505	0.0301
ICT – Software & Licensing	2.64%	1.34%	0.2408	0.0117
Professional Services – Consulting – Other	2.27%	1.62%	1.0198	0.0139
ICT – Laptops, Computers & Devices	2.22%	2.89%	0.1228	0.0272
Human Resources – Temp/Agency Staff	1.95%	1.55%	0.1171	0.0145
Educational – Books & Learning Resources	1.82%	1.34%	1.9678	0.0095
School Operations – External Education Providers	1.71%	2.78%	2.6611	0.0234
Facilities	1.63%	5.34%	0.1457	0.0502
School Operations – Insurance	1.40%	0.31%	0.0128	0.0029
ICT – Telecommunications	1.32%	0.76%	0.0249	0.0072
ICT – Printers & Associated Services	1.32%	0.67%	0.058	0.0063

Table 2: top 80% of supplier spend by supplier category

The structure of spending largely aligns to the ongoing operational requirements of the School, with the exception of Construction Trades and Services, which is reflective of several major capital projects completed within the reporting period.



Supply chain risks

Having now completed several years of supply chain analysis, 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 'estimated people in forced labour' (EFL) which indicates the theoretical number of people in conditions of modern slavery within

the supply chain. To consistently measure the organisation's impacts on modern slavery, the EFL can be measured per million dollars spend (EFL/M).

Haileybury's holistic EFL/M at the end of the 2024 reporting period was 0.0145. This represents a 19.8% decrease since the same time last year.

Higher risk industries

Haileybury's top 10 industries by risk level is consistent with the prior reporting period. Notably, construction work features highly as a result of major capital projects undertaken during the 2023 and 2024 reporting periods. Educational services supplied by a school in Timor Leste have been identified to have the highest risk, however, due to our close working relationship with the supplier, we do not recognise this to pose the highest risk to the School.

Therefore, textiles have once again been identified as having the most significant risk. Despite this risk level, textiles carries very little risk in Tier 1 of the supply chain, which is in stark contrast to construction work where the majority of risk is held in Tier 1.

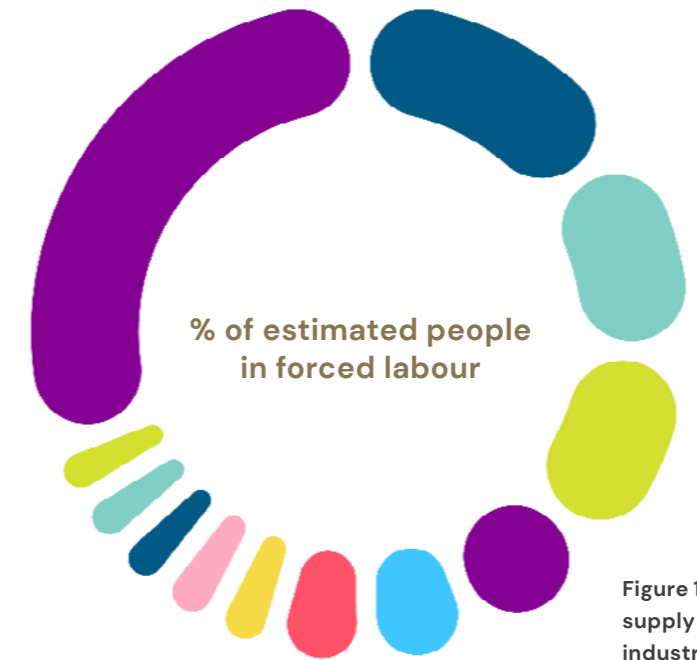
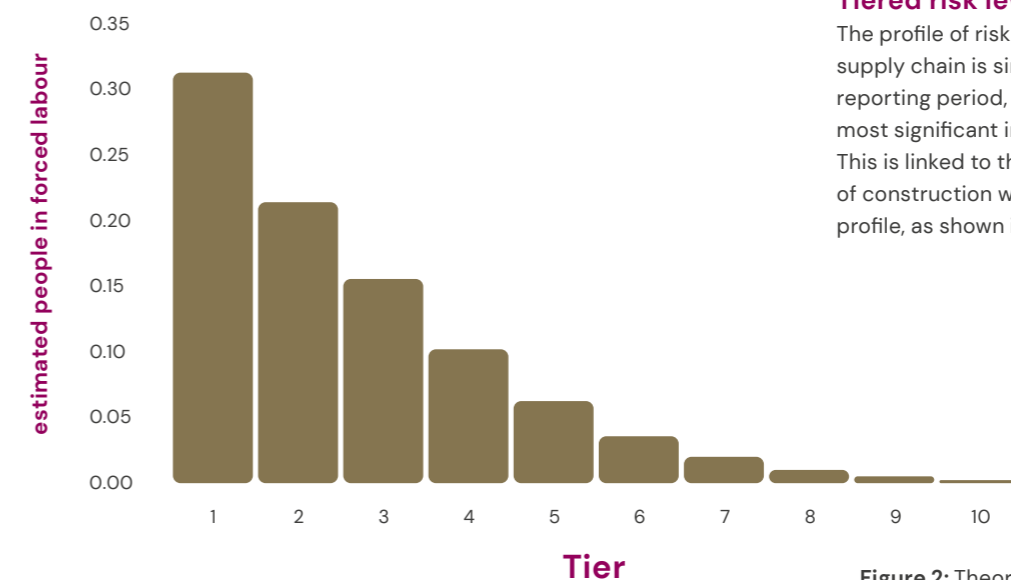


Figure 1: top 10 supply chain industries by risk level



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Tiered risk level

The profile of risk in Haileybury's supply chain is similar to the prior reporting period, where Tier 1 is the most significant in terms of EFL. This is linked to the significance of construction work in our spend profile, as shown in Figure 3.

Figure 2: Theoretical Slavery Footprint by Supply Chain Tier

Figure 3: Percentage of theoretical slavery footprint by industry at Tier 1 of the supply chain

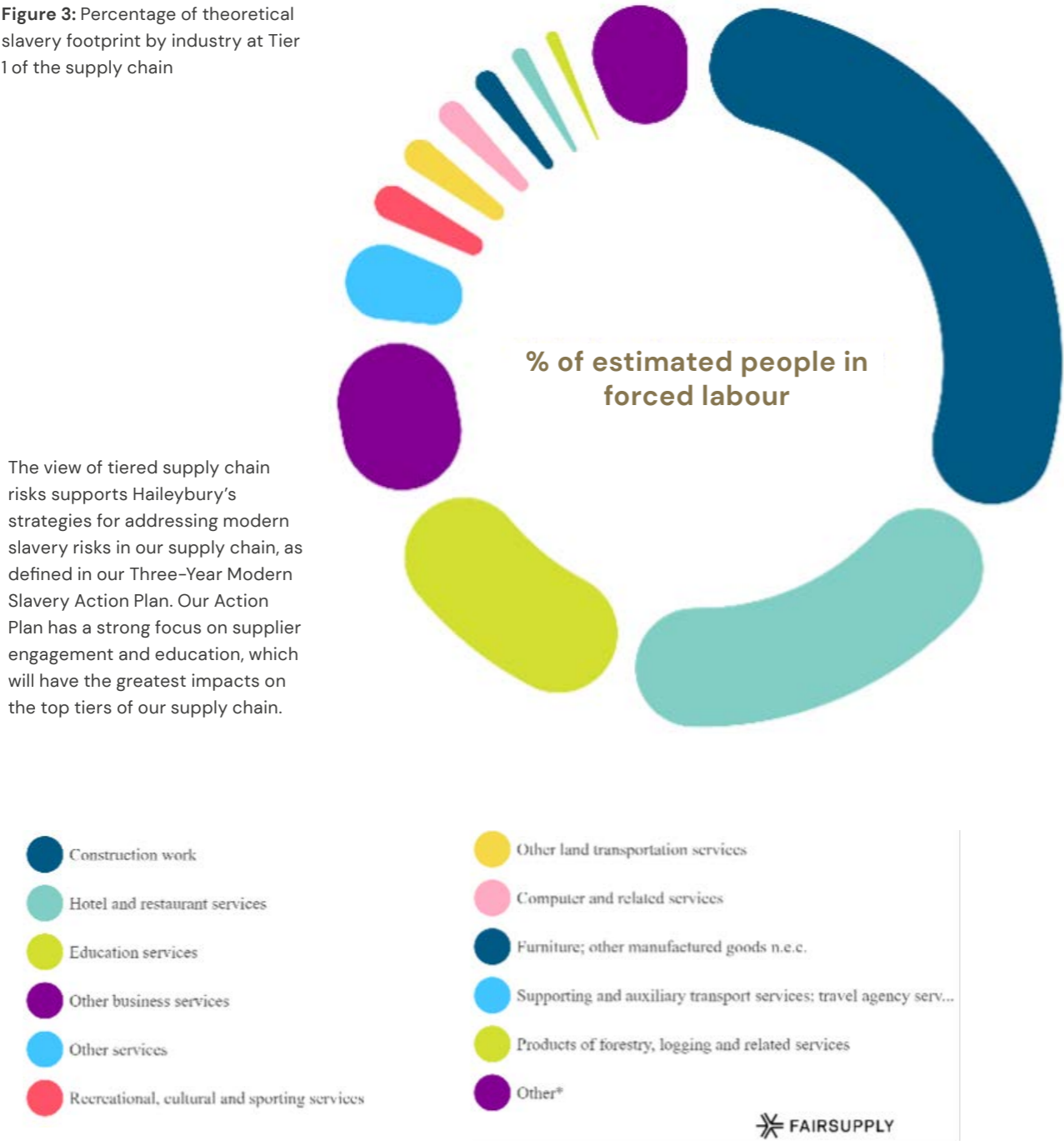
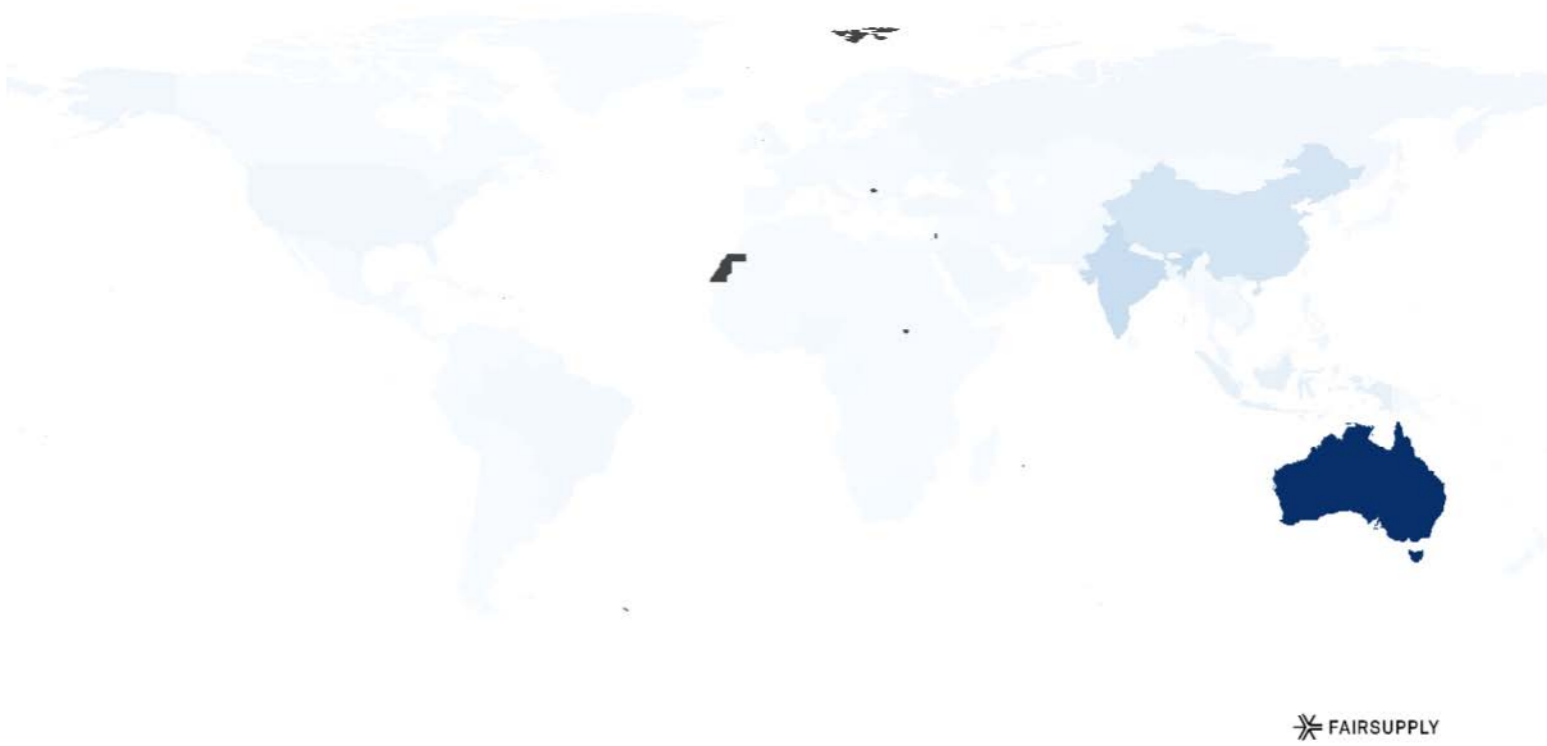


Figure 4: Theoretical Slavery Footprint by Country



Geographical risk

The map above represents Haileybury's TSF by geographical location. Over 85% of Haileybury's EFL exists within 10 countries, represented in the table below.

Country	Estimated people in forced labour	Percentage %
Australia	0.4814	51%
India	0.1085	11%
China	0.0832	9%
Indonesia	0.0351	4%
Vietnam	0.0159	2%
Bangladesh	0.0159	2%
Malaysia	0.0145	2%
United States	0.0141	1%
Thailand	0.012	1%
Pakistan	0.0117	1%

Australia ranks highly, predominantly due to the concentration of Haileybury's Tier 1 supply chain and therefore spend. The remaining countries feature most highly in tiers 2 and 3, with Tier 2 being represented most highly.

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. Those suppliers representing the highest risk will be the focus of the supplier engagement and education strategies articulated in our Three-Year Modern Slavery Action Plan.

Since 2021, Haileybury has conducted modern slavery surveys of its suppliers and has received 1,105 survey responses in that time. During the 2022 reporting year, Haileybury implemented the survey as a mandatory requirement for all new suppliers onboarded. The supplier survey provides Haileybury with greater context around supplier knowledge, practices, procedures and responses to managing modern slavery risks.



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 the 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 always prioritised. 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 and Tianjin Haileybury Elite School, we will work to influence and ensure a similar ethos within those schools' Chinese operations, recognising that as an investment of Haileybury, it is important for us to manage any risks of modern slavery within that environment.

Being an independent school, driven by consistent demand, our budgetary pressures in relation to our operations or supply agreements are relatively unaffected. We therefore do not filter down pressure upon our own workers or suppliers or other businesses.

Actions taken to assess and address risks

During the earlier reporting periods, 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 were developed and embedded into supplier contracts and the School began to lay the groundwork for an informed anti modern slavery approach.

During the 2024 reporting period, Haileybury has continued to advance its anti modern slavery program by:

- > undertaking a fourth round of supply chain risk assessments through engagement with FairSupply Analytics, further developing a view of supply chain risk over time
- > growing and developing the Modern Slavery Working Group
- > promoting staff awareness via training and resources readily available on Haileybury's online Hub; as well as sharing training materials and resources with suppliers.

This is in addition to existing due diligence, governance and risk management measures, including:

- > a Three-Year Modern Slavery Action Plan
- > anti modern slavery clauses are embedded into supplier contracts
- > a Procurement Framework
- > 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.



Supply chain risk assessment

During the 2024 reporting period, Haileybury continued its engagement with FairSupply Analytics to undertake detailed supply chain mapping and risk assessment for our entire supplier base. FairSupply Analytics employs a proprietary analysis method 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.

This extensive analysis has provided invaluable insights to Haileybury to understand our existing risk profile as well as inform anti modern slavery initiatives moving forward. This is the fourth consecutive year that Haileybury has undertaken the supply chain risk assessment with FairSupply Analytics. As we collect data about our supply chain risks over time, we are able to draw greater insights on the nature of modern slavery risk in our supply chain and the effectiveness of our supply chain risk mitigation measures.

Supplier surveys

During the reporting periods 2020 through 2024, 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 2024 reporting period, we have received approximately 1,105 survey responses from suppliers in a wide range of categories and of varying size.

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 chains.

Reporting and effectiveness

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. Having now embedded modern slavery reporting in the onboarding process for all new suppliers and incorporating modern slavery requirements in all new supplier contracts we are deepening the engagement with suppliers at an earlier stage.

Haileybury's EFL/M 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. Many 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

Haileybury's Three-Year Modern Slavery Action Plan forms the basis of our efforts to combat modern slavery risk in the coming reporting period. The Action Plan comprises four pillars: Educate; Be Informed; Mitigate Risk; Evaluate.

Specific initiatives captured in the second year of the Action Plan include:

- › providing mandatory ethical purchasing training for budget managers
- › enhancing awareness among our staff and suppliers through the provision of training materials, seminars and information sessions
- › communicating mechanisms for individuals within our supply chain to raise concerns and grievances about modern slavery
- › conducting audits on high-risk suppliers with a focus on supplier conduct, human rights and risks associated with modern slavery
- › establishing targets for key modern slavery metrics
- › undertaking a self-assessment of organisational maturity in modern slavery risk management.

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 6 March 2025. The Haileybury School Council is Haileybury's Principal Governing Body under the MSA.



Prof Gregory Whitwell

Chairman of Council
Responsible Member of Haileybury's
Principal Governing Body

