

### Introduction

This is The Scots College's first Modern Slavery Statement submitted pursuant to the Commonwealth Modern Slavery Act 2018 (the Act) which outlines the steps we have taken during the reporting year ended 31 December 2024.

At The Scots College, we are committed to upholding the highest standards of ethical conduct and ensuring that our operations and supply chains are free from any form of exploitation or human trafficking.

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 recognise that modern slavery is a serious global issue, and as part of our responsibility to our students, staff and community, we are dedicated to taking proactive steps to prevent modern slavery in any form.

This Modern Slavery Statement outlines the College's actions, policies and initiatives to combat modern slavery, both within our own operations and in our supply chains. It reflects our ongoing commitment to identifying, addressing and mitigating risks related to modern slavery, ensuring that our practices align with relevant legislation, including the Australian Modern Slavery Act 2018, and uphold the values of integrity, respect and fairness.

This statement serves as a public declaration of our stance on modern slavery and our commitment to transparency, accountability and ethical business practices.

#### **Criteria 1: About The Scots College**

Established in 1893, The Scots College is an independent, Presbyterian primary and secondary day and boarding school providing a world-class education to boys at the following locations:

- Bellevue Hill, Sydney 3 year olds to Year 12, including Boarding from Year 5
- Dolls Point, Sydney Kindergarten to Year 6
- Rose Bay, Sydney Early Years Centre, 3 and 4 year olds
- Kangaroo Valley, NSW Glengarry Outdoor Education Program: a two-term residential experience undertaken by Year 9 boys two hours south-west of Sydney.

The College is renowned for its strong academic foundation, vibrant co-curricular programs and emphasis on developing young men of character and integrity.

As an institution, The Scots College is committed to fostering an environment where respect, dignity and equality are fundamental values. We recognise our responsibility to ensure that modern slavery, in all its forms, is not present within our own operations or in our supply chains. We are dedicated to continuously improving our practices and maintaining

# **Modern Slavery Statement 2024**

transparency in order to uphold the rights of individuals within our community and beyond.

The College serves a diverse community of students, staff and families, and our values are reflected in every aspect of our educational experience. We strive to lead by example, instilling in our students the importance of social responsibility, ethical conduct and a commitment to creating a more just and compassionate society.

This statement outlines our approach to combating modern slavery and demonstrates our ongoing commitment to ensuring ethical standards are upheld throughout our operations, supply chains and business relationships.

#### **Our Motto**

Utinam Patribus Nostris Digni Simus – May we be worthy of our forefathers.

#### **Our Mission**

The Scots College is a distinctive Australian boys' school promoting the lordship of Jesus Christ in all things.

#### **Our Purpose**

We exist to inspire boys to acquire a knowledge of the truth through faith in Jesus Christ so that they might learn, lead and serve in families, society and the world as they strive for excellence together.

#### Our Values

At The Scots College, we value:

- Our Faith and Tradition which inspire truth, honour, loyalty and commitment.
- The Quest for Excellence through adventure, curiosity, creativity and personal growth.
- Leadership Through Teams in a spirit of service, compassion, humour and community.

#### **Criteria 2: Structure and Operations**

#### **Reporting Entity**

This Modern Slavery Statement has been prepared by the Council of The Scots College and covers The Presbyterian Church (New South Wales) Property Trust trading as The Scots College (ABN 86 438 712 994) for the calendar year ended 31 December 2024. The Scots College does not own or control any other entities.

#### Structure

The Council of The Scots College is the governing body of the school. The 2024 College Council had 12 members, including the Chairman. The Council brings a wide range of skills to their positions and provides informed decision-making. To assist in the execution of its role, the Council has three committees with regular schedules. Each of these have their own charters:

- Chaplaincy
- Finance and Risk
- Property and Works

The Principal is the head of the school's operation. Under the Principal, there are six pillars that run the school's operations namely, Vice Principal – Christian Ministry and Community, Deputy Principal – Student Experience, Deputy Principal – Academics, Deputy Principal – Sport and Co-Curricular, Director of Finance and Administration and Director of Operations and Planning.

#### **Operations**

The key activities of The Scots College is educating boys through their early, primary and secondary years. Our operations are entirely based in New South Wales. The College provides education to approximately 2,191 students and employs approximately 404.5 full-time equivalent staff.

In 2024, the College recorded gross annual revenue of \$118.7 million and a total procurement spend of approximately \$40.8 million on goods and services (excluding salaries and wages) and \$23.5 million on capital expenditure to support our operations.

## Criteria 3: Modern Slavery Risks in Our Operations

The Act defines modern slavery as including eight types of serious exploitation:

- Trafficking in persons
- Slavery
- Servitude
- Forced marriage
- Forced labour
- Debt bondage
- Deceptive recruiting for labour or services
- The worst forms of child labour (situations where children are subjected to slavery or similar practices or engaged in hazardous work.)

Examples of at-risk suppliers include construction, cleaning, clothing (textiles), food, information technology and overseas travel to undertake charitable activities.

The College recognises that our corporate social responsibilities fall in both our own direct activities and those of our supply chain.

#### **Our Operations**

The College is confident that the risks of modern slavery and human trafficking in our direct operations is very low due to the strict regulations in the education sector and employment laws that the College is required to comply with.

#### **Our Supply Chain**

The majority of our direct suppliers are based in Australia. In assessing the risk of modern slavery practices within our supply chain, several factors were considered, including:

- Geography: The geographic location of suppliers can influence the likelihood of modern slavery practices, particularly in regions where labour laws may be less stringent or enforcement is weak.
- Industry practices: Certain industries, such as construction, textiles and food production, can be more vulnerable to exploitative labour practices due to factors like low wages, temporary labour and irregular work conditions.
- Labour status: The nature of employment within certain sectors or companies, including the reliance on contract or migrant labour, can increase the risk of modern slavery.

Based on the factors above, we identify that modern slavery risk may exist in the following areas within our supply chain:

- Construction and maintenance services: This includes contractors involved in building, landscaping and facility maintenance, where migrant labour is often used and may be vulnerable to exploitative conditions.
- Cleaning services: Cleaning contracts are typically labour-intensive and often involve low-wage workers, which can create risks for modern slavery, particularly where subcontracting practices are involved.
- Textile and uniform suppliers: As with many clothing and textile companies, there is a heightened risk of exploitation in international supply chains, particularly in low-wage manufacturing countries.
- Food supply chain: Some food sectors, particularly in agriculture and food processing, can be prone to forced labour or debt bondage, especially if involving workers on temporary or seasonal contracts.
- Information technology: The IT industry, especially in areas related to the manufacturing of components or assembly, may involve suppliers in countries where labour standards are not always enforced effectively.
- Overseas travel and charitable operations: This includes risks in international travel for charitable events, where there may be unregulated recruitment practices or exploitation of workers in destination countries.

## Criteria 4: Actions Taken to Assess and Address Risk

The College has taken steps to actively monitor and address these risk within our supply chain, including:

- Supplier engagment: We work with suppliers to ensure they are aware of our policies on modern slavery and that they are committed to ethical and legal practices.
- Due diligence processes: We perform due diligence checks on new suppliers, particularly those in higher-risk industries, and require regular reporting on their labour practices.
- Contractual obligations: We are improving our contracts
  with suppliers to include clauses that require compliance
  with all relevant labour and human rights laws,
  including commitments to prevent modern slavery and
  human trafficking.
- Ongoing monitoring: We will continually assess and review our supply chain to identify emerging risks and take appropriate action as necessary.

#### **Criteria 5: Effectiveness Assessment**

The College remains committed to ensuring that all aspects of our operations, and those within our supply chain, operate in a manner that is free from modern slavery and exploitation. We will continue to refine our approach to managing these risks and ensuring that we uphold our responsibility to respect and protect the rights of workers across our entire operation.

This Modern Slavery Statement was approved by the Council of The Scots College on 25 February 2025.

Dr lan PM Lambert

Chairman