

# Modern Day Slavery Statement.

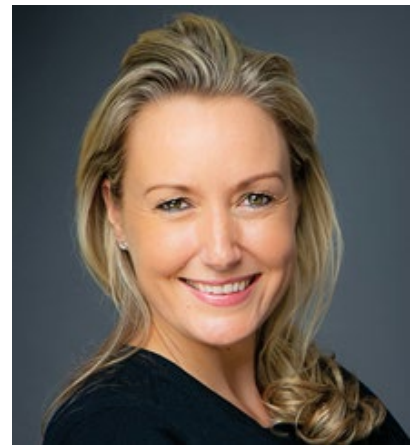


## Our Commitment

As a leading childcare provider, we insist on upholding the highest standards and ethics at every level of our business. We are committed to acting with integrity, honesty, transparency and fairness at all times, to uphold our ethical standards and to protect our reputation.

The Busy Bees vision is to give every child the best start in life, underpinned by our values of "Care, Quality, Service and Value". Our commitment to these values is codified in our Code of Conduct, which we issue to our workforce to make clear that we are expected to operate to the highest standards in everything we do.

We recognise that modern slavery is a growing global issue and we understand that we are responsible for preventing, mitigating and addressing (if necessary), these risks in our business and our supply chain. We will always treat people in our business and supply chain fairly and will not tolerate slavery, servitude, bonded, forced or compulsory labour in the manufacture of products we use and will not accept products or services from suppliers who employ or utilise slavery, servitude, bonded, forced or compulsory labour in any manner.



**Cheryl Creaser**  
CEO, Australia



# Modern Day Slavery Statement



This statement is made jointly by the Reporting Entities, Busy Bees Australia Holding Pty Ltd, Busy Bees Australia Bidco Pty Ltd, Busy Bees Early Learning Australia Pty Ltd ("BBELA") and Think Childcare Pty Ltd ("Think Childcare") (together, "Busy Bees Australia"), which has been prepared in accordance with the requirements of the Modern Slavery Act 2018 (Cth) ("Act") for the financial year ending 31 December 2022.

## Our organisation structure and operations

Busy Bees Australia is part of an international group with headquarters in the UK ("Busy Bees"), which globally owns and operates a portfolio of childcare centres.

Since inception in the UK in 1983, Busy Bees has become synonymous with high quality care and education. With its acquisition of Australian based, Foundation Early Learning in 2018, Busy Bees has brought to Australia its practical, child-centred approach, where children are respected as individuals and encouraged to learn and develop at their own pace within a home from home environment that meets rigorous safety standards.

Building on the existing local Australian roots overlaid with best practices from across the global Busy Bees network that extends to eleven countries, crossing four continents, Busy Bees Australia has grown to become one of the largest providers of early years education and childcare in Australia. Busy Bees Australia owns more than 140 operating childcare centres across Australia and its workforce is made up of approximately 3,500 permanent part-time, full-time and casual employees supplemented, as needed, by consultants and agency workers.

Our values: Care, Quality, Service and Value underpin everything that we do across our centres and our National Support Centres. Attracting the highest quality educators for our centres and the highest calibre of department expertise is key in delivering exceptional education and care. With sector leading, long standing leadership teams Busy Bees remains dedicated to its vision to give every child the best start in life and stands by these quality standards in Australia and internationally.

## Our supply chains

Our primary group of suppliers at Busy Bees Australia are those that supply our childcare centres, including the provision of food, centre equipment, consumables, cleaning and maintenance services. The majority of Busy Bees Australia's suppliers are located in Australia who provide nationwide services under master services agreements or terms and conditions to our childcare centres. Our template master services agreements contain contractual provisions reinforcing supplier commitments and reporting requirements in relation to suspected modern slavery issues. Over the last reporting period we conducted a comprehensive audit of each of Busy Bees Australia's current suppliers which did not identify any significant modern slavery risks or breaches..

## The actions taken by Busy Bees Australia, to assess and address modern slavery risks

Busy Bees Australia, and the entities it owns and control, have robust systems and controls in place to address the risk of slavery taking place in our business.

Think Childcare is now subject to the below noted governance, policies and procedures in respect of modern slavery risk as part of the Busy Bees Australia group of companies. Of the 71 childcare centres acquired as part of the Think Childcare acquisition, 35 centres are subject to a Centre Management Agreement, whereby they are managed by the existing management that existed prior to the sale of the centres. The Centre Management Agreement provides BBELA with oversight and step-in rights with respect to the management of the centres.

## Our recruitment processes and policies

With respect to the risk of modern slavery arising in connection with our own recruitment processes, we mitigate any potential perceived risk by continuing to ensure:

- Robust safer recruitment and employment policies and procedures for all our staff, consultants and workers.

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- We check the names and addresses, references, legal right to work and criminal record of our staff and consultants, with a new system in place to record these checks. Agencies are required to provide evidence of safer recruitment checks of any workers provided.
- We only use reputable recruitment and staffing agencies, and conduct diligence on these agencies before adding them to our approved list of agencies, including:
  - Background checks.
  - Checking agency staff have required paperwork.
  - Ensuring agencies are contractually committed to carry out checks on the staff they provide.

## Our supply chain due diligence

We have implemented systems and controls to address the risk of slavery taking place in our supply chain, in particular we:

- Carry out due diligence on all our key suppliers prior to onboarding.
- Conduct annual reviews of our key suppliers' policies and procedures to ensure slavery is not taking place in their business.
- Expect all those in our supply chain to comply with our values, with key suppliers required to commit to modern slavery contractual obligations. We will not support or deal with any business knowingly involved in modern slavery or human trafficking.
- In 2022, we did not receive any notifications of any of our key suppliers' failing to comply with its MDS obligations.

## Our policies

We are committed to mitigating the risk of modern slavery or human trafficking occurring in connection with our supply chains or in any part of our business. Our Modern Slavery Global Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to safeguard against slavery and human trafficking taking place anywhere in our supply chains. This policy sits alongside a framework of Busy Bees policies, which have been implemented by Busy Bees Australia, which ensure our values are reflected in all our activities, including:

- **Speak Up Policy** - ensures all employees have a confidential avenue to report concerns through. This includes a confidential and anonymous Speak Up helpline (managed by an independent provider 24/7, 365 days a year) where they can raise any concerns in respect of slavery in our business or our supply chains. In 2022, Busy Bees Australia did not receive any reports of MDS amongst our workforce, or within our supply chain.
- **Code of Conduct** - sets out our values and expectations of our people.
- **Manage Recruitment and Onboarding** - sets out the checks that must be completed ahead of any individual or company being recruited by Busy Bees Australia which align with requirements under the Australian Education and Care Services National Regulations and the Australian Government's National Principles for Child Safe Organisations.

Each of Busy Bees Australia's policies and training programs are accessible to all its employees, at any time, through the 'Promapp' portal, which they receive training on upon their induction.

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## Our Education and Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, all staff are required to complete mandatory MDS training upon commencement of their employment. Further training is then periodically provided to staff throughout their employment.

All Busy Bees Australia employees are also trained annually on the requirements and protections afforded to them under the Speak Up Policy.

Busy Bees Australia will continue to periodically review the effectiveness of the steps we have taken to address the risk of slavery or human trafficking in our business and supply chain. Busy Bees has implemented an 'ESG Global Committee' with Busy Bees Australia, and each of the entities it owns and control, being represented by its Chief Executive Officer.

## Further steps

Our focus during 2022 was:

- Assessing the risks in our supply chain by conducting a comprehensive audit of each of Busy Bees Australia's suppliers with a specific lens on ESG and modern slavery compliance, reviewing and improving our existing systems and controls and providing focused training for all those who carry out procurement in our business on the risks of modern slavery and human trafficking; and
- consulting with our external legal counsel to enhance our response to modern slavery risk within our business operations and supply chain.

**Kerri Lawrence**  
Director

Our focus in 2023 will be:

- introducing further governance in our procurement and contracting processes to ensure all key suppliers are subject to the appropriate level of MDS due diligence;
- reviewing our MDS training, and supporting policies, throughout the business to ensure they remain up to date and relevant; and
- continuing to review and implement the results of our MDS audit (carried out in 2023).

## Consultation

Each entity owned or controlled by Busy Bees Australia is governed by the same management team as directors, with shared governance, policies, and procedures in respect of modern slavery risk, which also reflect the Busy Bees' group governance standards. As such, consultation is integrated within Busy Bees Australia's operating model.

This statement was approved by the board of Busy Bees Australia Holding Pty Ltd (as the Australian parent company for Busy Bees Australia) on 4 July 2023.