

# Modern Day Slavery Statement



## Our Commitment

As a leading early education and care 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 employees, families and 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.



**Phil McKenzie**  
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”), and has been prepared in accordance with the requirements of the Modern Slavery Act 2018 (Cth) (“Act”) for the financial year ending 31 December 2023.

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.

## Our organisation

Since inception in the UK in 1983, Busy Bees has become synonymous with high quality care and education. With its entry into the Australian market, 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 learning and care 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 early childhood education and care. 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 people

The Busy Bees Australia workforce is made up of direct employees, contractors and agency workers. We have effective systems and controls in place to address the risk of modern slavery taking place in relation to our workforce, in particular we:

- have robust recruitment and employment screening policies and procedures for all employees and agency workers
- check the names and addresses, references, legal right to work and police record of our employees and agency workers
- ensure all team members have their own bank account and request verification of these details from new employees. Additionally, our HRIS systems do not allow an individual to amend their bank details without additional checks being made by our People team.

We only use reputable recruitment and staffing agencies, and ensure all agencies that supply workers to us:

- undertake relevant background checks
- ensure agency workers have required rights to work
- are contractually committed to carry out checks on the workers they provide.

We provide our team members with 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 modern slavery in our business or our supply chains. Our helpline is supported by our Global Speak Up policy, with all our staff trained annually on the requirement to Speak Up to help Busy Bees address any suspected misconduct. In 2023, Australia did not receive any reports of modern slavery in relation to our workforce.

Our confidential Employee Assistance Program also provides our team members with a secure way of seeking advice about any modern slavery issues personally affecting them or their families.

## Our supply chain

Our primary group of suppliers at Busy Bees Australia are those that supply our childcare centres, including the provision of food, resources, consumables, cleaning and maintenance services. We have implemented systems and controls to address the risk of modern slavery taking place in our supply chain, in particular we:

- Conduct annual reviews of our key suppliers’ policies and procedures to ensure modern 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 2023, we did not receive any notifications of any of our key suppliers’ failing to comply with their modern slavery obligations.

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.

## Our policies

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

We are committed to ensuring that there is no modern slavery or human trafficking our supply chains or in any part of our business.

# Modern Day Slavery Statement



The Busy Bees 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 ensure modern slavery and human trafficking is not taking place anywhere in our supply chains. This policy sits alongside a framework of Busy Bees policies, which ensures our values are reflected in all our activities, including:

- **Speak Up Policy** – ensures all employees have a confidential avenue to report concerns through, with both the policy and related training conducted for all employees in 2023.
- **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 employees, at any time, through the ‘Promapp’ and ‘Go 1’ portals, which they receive training on upon their induction.

Think Childcare, acquired by Busy Bees Australia in 2021, is subject to the same 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, 34 centres continued to be subject to a Centre Management Agreement, whereby they are managed by a third party manager. The Centre Management Agreement provides Busy Bees Australia with oversight and step-in rights with respect to the management of the centres.

## 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 Modern Day Slavery training upon commencement of their employment. Further training is then periodically provided to staff throughout their employment.

## Further Steps

We will continue to periodically review the effectiveness of the steps we have taken to address the risk of modern slavery in our business and supply chains.

Our focus during 2023 was:

- establishing a new procurement and contracting function to oversee all new procurement activities for the business, with a focus on supplier diligence and governance;
- introducing further governance in our procurement and contracting processes to ensure new key suppliers are aware of and comply with their modern day slavery obligations; and

- reviewing our modern day slavery training and supporting policies to ensure they are up to date and relevant.

Our focus in 2024 will be:

- further reviewing and refining the inherent modern slavery risk that exist within the Busy Bees Australian supply chain;
- developing a Procurement and Contracting Policy to define and embed the governance and reporting obligations relating to supplier identification and onboarding, to ensure appropriate supplier diligence is undertaken where the relevant supply involves an elevated risk of modern slavery within the supply chain.
- Investigating the feasibility of a subscription to the Sedex platform

## Consultation

Each entity owner 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 Australia parent company for Busy Bees Australia) on 26 June 2024.

**Phil McKenzie**  
CEO, Australia