



MODERN SLAVERY STATEMENT

Goodstart Early Learning Ltd ACN 139 967 794

FY2020

ABOUT GOODSTART

Goodstart, as a not-for-profit social enterprise, has for ten years been creating positive social change by giving Australia's children, especially our most vulnerable, the best possible start in life – access to high quality early learning.

Goodstart was created a decade ago by a partnership of four of Australia's leading charities, who recognised a child's early years experiences as having a huge influence on the rest of their lives – The Benevolent Society, The Brotherhood of St Laurence, Mission Australia and Social Ventures Australia.

Since then, Goodstart has been on a journey of transformation. All of the profits Goodstart earns from its centres are directed back into improving the quality of early learning and supporting disadvantaged and vulnerable children and their families.

OUR STRUCTURE

Goodstart Early Learning Limited ACN 139 967 794 ('Goodstart') is an unlisted public company, limited by guarantee, incorporated in Australia with its registered office in Brisbane, Queensland. The company is registered as a charity with the Australian Charities and Not for Profit commission.

Goodstart's subsidiaries during the reporting period 1 July 2019 to 30 June 2020 ("the period") were GS Admin Services No 1 Pty Ltd ACN 169 578 796, and Goodstart Early Years Ltd ACN 133 530 364 (together referred to as "the Goodstart Group" or "'us" or "we" or "our"). Goodstart Early Learning Limited is the operating entity in the Goodstart Group and is the chief acquirer of goods and services.

Goodstart is submitting this statement as a joint statement in accordance with the Modern Slavery Act 2018 (Cth) on behalf of the Goodstart Group.

Our Board has been updated on the reporting and compliance requirements under the Modern Slavery Act 2018 (Cth).

OUR OPERATIONS

Our principal services include the provision of long day care, preschool and kindergarten programs. Goodstart is the largest early learning and care provider in Australia and the nation's largest non-government provider of preschool and kindergarten programs.

As at 30 June 2020, we:

- Operate 671 Goodstart branded centres, with centres in each State and Territory;
- Employ 15,600 employees; and
- Care for 76,100 children at our centres.

Further information about Goodstart and our operations can be found in the Goodstart Annual Report 2020 at www.goodstart.org.au.

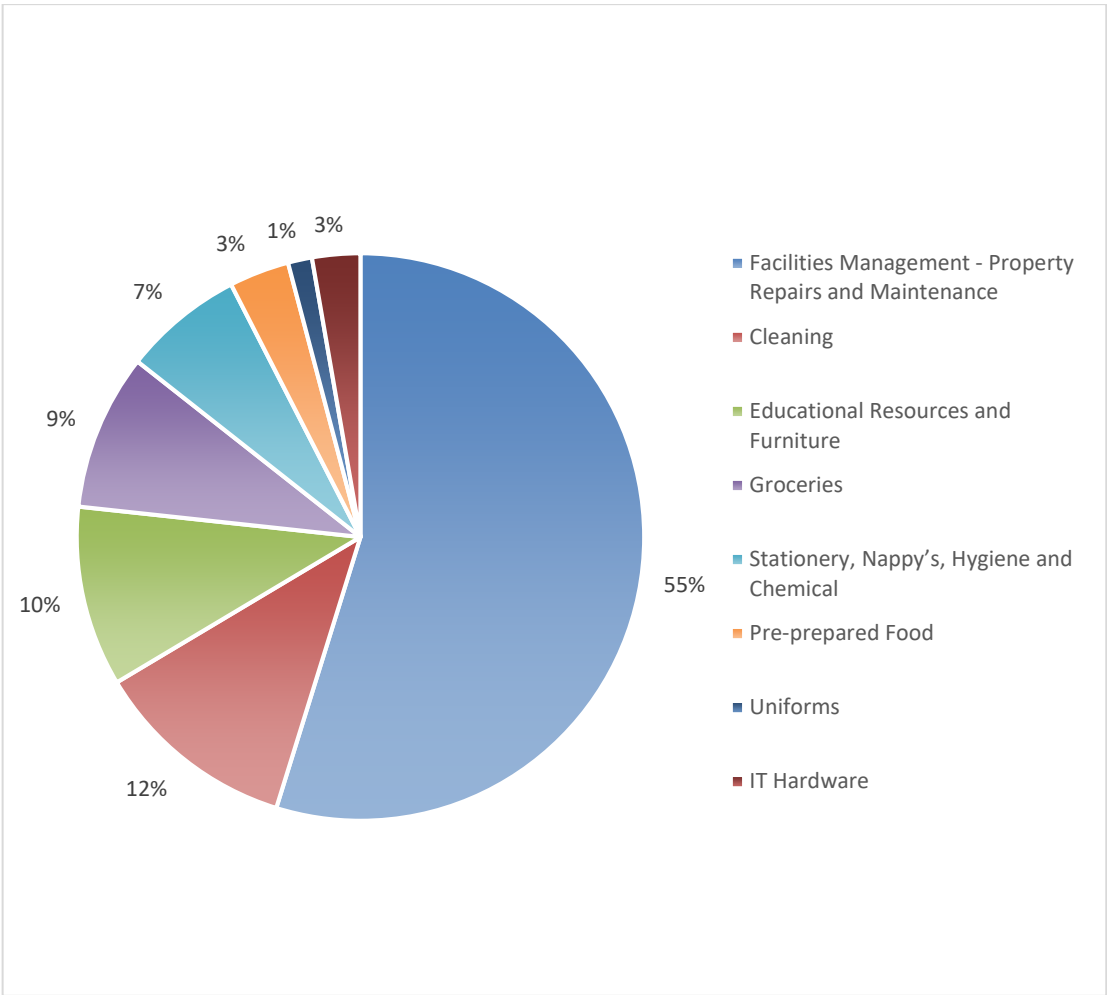
OUR SUPPLY CHAIN

Goodstart manages approximately 68 suppliers with a total spend in excess of \$296M in FY20. In an analysis of suppliers and the supply chain against modern slavery risk indicators, 49% of the supply chain is considered potentially high risk. The number of suppliers in the potentially high-risk category closely reflects risk associated with the goods and services supplied. These suppliers are closely monitored through a centralised procurement function.

The 68 suppliers are key suppliers under contract. Goodstart also deals with many other organisations who support the operations of our organisation and corporate functions which have been deemed low risk. The key areas in which we engage suppliers to provide goods and services are as per the following top 8 categories of spend identified as high-risk categories where there is a potential for slavery in supply chains to occur.

Our spend categories

Category	Regions Sourced / Manufactured
Facilities Management - Property Repairs and Maintenance	Australia
Cleaning	Australia
Educational Resources and Furniture	Asia, Europe, USA
Groceries	Various
Stationery, Nappies, Hygiene and Chemical	Asia, Australia, USA
Pre-prepared Food	Australia
Uniforms	China
IT Hardware	China



MODERN SLAVERY RISKS

During the year ending 30 June 2020, a risk assessment was undertaken for modern slavery risks within our operations and supply chain. Through the risk assessment, we identified the following modern slavery risks within our operations and supply chain.

In our Operations

Goodstart deems the risk of modern slavery practices in our directly employed workforce to be very low. This is due to the highly regulated nature of the labour market in Australia, the strict regulation of early learning and child to staff ratios, the presence of unions to represent employees, and our employees undertaking work in environments where there are established industrial policies and processes.

As part of Goodstart's existing and ongoing internal audit program, Ernst & Young were commissioned to review Goodstart's time recording management practices and rostering during FY20. No high-risk areas were identified, and all audit actions were closed out during the period.

The risk of modern slavery practices in relation to staff who are contractors engaged through a labour hire agency is slightly higher.

In our Supply chain

The risk of modern slavery practices in our supply chain is influenced by country of origin and product category.

The 2018 Global Slavery Index measures the extent of modern slavery country by country, and by product category. The top two products at risk of modern slavery imported into Australia are: electronics such as laptops, computers and mobile phones; and garments. Most of these products are imported from Asia. The prevalence of modern slavery throughout Asia varied between countries but was generally high.

Accordingly, the area where Goodstart is most likely to be linked to modern slavery, is the purchase of educational resources, furniture, uniforms and IT hardware, originating in Asia.

DUE DILIGENCE AND REMEDIATION

Operational due diligence

The steps we have taken to assess and mitigate modern slavery risks within our operations include:

- > We have identified risks within our supply chain and have adopted a risk-based approach to modern slavery heavily focused on tier one suppliers and the primary site of manufacturing in their supply chain. Those suppliers identified within these categories are monitored closely.
- > Started increasing awareness of modern slavery risks among staff, for example, by discussing it at the Centre Connect Forum held in November 2020.

Supply chain due diligence

The steps we have taken to assess and mitigate modern slavery risks in our supply chain include:

- > engaging with key suppliers to understand 'country of origin' issues and how they are addressing their modern slavery risks, including obtaining copies of supplier's modern slavery statements and supply chain mapping/audits.
- > referencing Modern Slavery and the need for ongoing reporting requirements included in all RFP documents issued by Procurement and or activity overseen by Procurement. This is included as part of the supplier pre-qualification to which suppliers must note conformance to within submissions.
- > including modern slavery commitments/warranties, and auditing and reporting requirements in new supplier contracts, wherever possible.
- > requesting compliance statements from high risk suppliers.

Grievances and remediation processes

Goodstart is committed to the protection and respect of human rights across our operations and supply chain. Where we identify that Goodstart has caused or contributed to adverse impacts such as modern slavery, we will seek to address human rights grievances in line with relevant policies and procedures.

Goodstart's Whistleblower Policy provides a mechanism for employees, suppliers, and contractors (including employees of suppliers and contractors), to anonymously report suspected wrongdoing without fear of retaliatory action. If a report is received it will be managed by Goodstart's designated Whistleblower Protection Officers and investigated at their direction by our dedicated internal investigators, or external investigators, where appropriate.

Where risks are identified in our operations or supply chain, Goodstart will take the following steps to remediate the risk:

- We will engage with the identified supplier to develop a solution that eradicates and remediates modern slavery where it has been found, including through the enforcement of contractual rights, where relevant; and,
- Seek to further educate and uplift understanding with suppliers through engagement and where possible support the development of new products or services that continue to build on the supplier's capabilities and capacities to continue to supply goods and or services ethically.

EFFECTIVENESS MEASURES

Goodstart will continue to assess the effectiveness of actions being taken to modern slavery risks by:

- Regularly reviewing its supply chains against modern slavery risks and tracking changes in risk profiles over time;
- Engaging regularly with suppliers to ensure their understanding of the risk and eradication of such risk; and
- Including Modern Slavery Risks in Goodstart's corporate risk register and reporting against the above and other identified metrics in regular risk reporting to Goodstart's senior management and Board.

The Board approved this statement on 24/3/2021.



Signed:

Julia Davison

Director, Goodstart Early Learning Limited.