

## Junior Adventures Group – Modern Slavery Statement – 30 June 2020

### Overview

At Junior Adventures Group, people are our business.

As such, we recognise that we have a responsibility to respect and protect the human rights of not just our employees, but also those people who are employed throughout our supply chain.

This is particularly important when it comes to the risk of modern slavery, as it comprises the worst forms of human rights abuse. Taking action to prevent modern slavery in both our supply chain and our operations is therefore central to our human rights responsibilities as an organisation.

This Modern Slavery Statement ('the **Statement**'), which was drafted in accordance with the requirements of the Australian Modern Slavery Act 2018 ('the **Act**'), covers our financial year ended 30 June 2020 ('the **Reporting Period**'). It details our approach to managing modern slavery risk in our operations and supply chain and summarises our progress to-date.

The Statement has been approved by the Board of Junior Adventures Group.

### 1.0 Reporting Entity and Corporate Structure

Panther Topco Pty Ltd (ACN: 626 390 136) is the reporting entity as defined by the Act and the ultimate holding company of a number of operating entities belonging to what is known as Junior Adventures Group ('**JAG or the Group**'). This Statement covers the operations of the Group's owned and controlled entities, including:

#### *JAG Australia:*

- OSHClub Pty Ltd (ACN135 003 520): Operates Outside of School Hours Care (OSHC) services in Australia
- Primary OSHCare Pty Ltd (ACN 108 614 080): Operates OSHC services in Australia
- Sherpa Kids International Pty Ltd (ACN 160 539 551): International franchisor of the SKIDS and Sherpa Kids brands
- Helping Hands Network Pty Ltd (ACN 134 154 162): Operates OSHC services in Australia
- Reliance HR Solutions Pty Ltd (ACN 154 205 160): Provides labour services in Australia as well as acting as the corporate services entity in Australia
- Young Minds Connect Pty Ltd (ACN 165 742 558): Provides incursion/excursion services in Australia
- Sofus Holdings Pty Ltd (ACN 168 832 933): Licences IP in Australia

#### *JAG UK:*

- Sherpa Kids England Ltd (CN: 11705893): Operates and Franchises OSHC services in the United Kingdom
- Energy Kidz Ltd (CN: 07054337): Operates OSHC services in the United Kingdom
- Fit for Sport Ltd (CN: 03648410): Operates OSHC services in the United Kingdom

#### *JAG NZ:*

- *Skids Programme Management Ltd (NZIC: 1804662): Operates OSHC services in New Zealand*

- *Safe Kids in Daily Supervision Ltd (NZIC: 2442969): Master Franchisor of OSHC services in New Zealand*

The JAG Board is the principal governance and oversight body of the Group, including all wholly-owned and majority owned operating entities in Australia and overseas. The Board is accountable for ensuring that the Group appropriately manages all risks, including those related to modern slavery. The Group CEO is responsible for the implementation of the organisational strategy and risk management plans.

As this is the first Statement prepared by the Group, we have focused primarily on our Australian operations and supply chain, with the intent to expand our analysis and approach to our global organisation in future periods.

This Statement has been prepared after assessing the impact on JAG Australia's operations and consulting with stakeholders of all departments within JAG Australia.

## 2.0 Our Operations and Supply Chain

### *Our Operations*

Through company-owned, managed and franchise operations, JAG provides Outside of School Hours Care (OSHC) programs to nearly 1,000 schools worldwide. In order to deliver these services, JAG employs approximately 4,700 people across Australia, the UK and New Zealand.

The 3,000 people employed by JAG Australia provide before and after school care, and vacation care programs to government, independent and catholic primary schools across the country. We pride ourselves on providing the highest quality programs everywhere we operate.

Our brands OSHClub, Helping Hands Network, Primary OSHCare, sKids, Sherpa Kids, Energy Kidz and Fit for Sport are leading the sector in quality and safety, fostering an environment in which the children within our care continue to learn and have fun. We believe in the importance of learning through play, and that we can influence the development of every child in our care.

### *Supply Chain*

JAG Australia utilised approximately 340 suppliers during the reporting period. Our major categories of suppliers are as follows:

- Property
- Marketing
- Professional services
- Operations
- People
- Travel
- Insurance
- IT

These suppliers provide goods and services required to provide the child care services to our customers and school partners. The largest proportion relates to operating supplies for our services and food for the children in our care. Our suppliers are predominantly based in Australia.

Overall, JAG Australia has established long term relationships with key suppliers who service our schools.



### 3.0 Modern Slavery Risk Areas

Modern slavery includes eight key types of human exploitation:

- trafficking in persons;
- slavery;
- servitude;
- forced marriage;
- forced labour;
- debt bondage;
- deceptive recruiting for labour or services; and the worst forms of child labour

With this understanding, JAG Australia performed a high level review of the potential risks of modern slavery within both our operations and our supply chain.

#### *Our Operations - People Risks*

We have considered our recruitment, remuneration and employment practices and the nature of our workforce to assess the potential risks of modern slavery occurring in our operations. Based on the outcomes of this assessment, it is JAG Australia's view that as an employer in a highly regulated industry, we consider the risk of modern slavery to be low. This is due to the high level of vetting conducted on employees, as well as our adherence to modern pay award practices.

#### *Supply Chain Risks*

JAG Australia engages with suppliers and outsourced vendors. We recognise that certain suppliers may have a higher risk of modern slavery due to the nature of the product and where it is produced. Our assessment of risk includes:

- High risk industries;
- High risk countries;
- High risk outsourcing arrangements; and
- Vulnerable employees.

Our suppliers were categorised as low, medium or high risk based on the above assessment.

As a purchaser of children's supplies from large vendors, we consider the geographic origin of the product to cause the highest risk of modern slavery in our supply chain.

JAG Australia acknowledges that during the reporting period it received products and services from suppliers operating in what could be considered high risk industries, including:

- travel;
- Cleaning services;
- human resource & employment services; and
- office services & supplies.

No reported incidents in JAG Australia's operations or supply chain relating to human rights violations or incidents of modern slavery were brought to management's attention during the reporting period. However, we note that modern slavery is a hidden issue and is often very difficult to uncover. We acknowledge that we still have more we can do to effectively manage this risk going forward.

It is JAG Australia's intention to conduct due diligence on all major suppliers (regardless of risk) as they represent most of the direct supply chain of the company.

#### 4.0 Our Actions

JAG Australia has policies and procedures in place as part of its commitment to providing a fair and safe work environment for everyone.

These policies include:

- A **Whistleblower Policy** which outlines our commitment to encourage people to speak up if they become aware of potential misconduct, explain what protections a discloser will receive and promote a workplace environment in which everyone feels safe, supported and encouraged to speak up. Disciplinary action will be considered for those shown to have disadvantaged, victimised or caused detriment to a person because they want to, or have, spoken up.
- An **Employee Code of Conduct** designed to clearly outline the broad behaviours all employees are expected to demonstrate.
- An **Equality & Diversity Policy** ensuring that our workplace is a safe, flexible and respectful environment for all, free from all forms of discrimination, bullying and harassment, where individual differences are valued. The policy is supported by a grievance procedure document that clearly outlines the appropriate ways to resolving disputes that may occur in the workplace.

These policies and processes demonstrate our commitment to a safe and inclusive work environment and provide some comfort that human rights issues can be safely raised and dealt with appropriately. However, we do acknowledge that more can be done and plan to look into how we can further incorporate modern slavery risks into our internal policies and procedures.

#### People

JAG Australia has internal functions but also engages Human Resources business partners to facilitate engagement with our employees. Key actions to support the low risk of modern slavery include:

- Review of standard conditions of employment including the code of conduct;
- Ensuring our recruitment and screening policy is adhered to including multiple reference checks, right to work and criminal history checks;
- Adhering to the award requirements for remuneration of our people; and
- Communicating our whistleblowing policy.

#### Next steps

As part of our commitment to managing the risk of modern slavery in our workforce, we commit to:

- Communicating the Modern Slavery Act's requirements and encouraging employees to use our whistleblowing policy if they are subject to, or become aware of, incidents of modern slavery; and
- Develop a process to ensure that any reported incidents are handled by appropriately trained personnel.

#### Suppliers

The risk factors identified in Section 3 were used to analyse JAG Australia's suppliers. Four major suppliers represented the majority of JAG Australia's spend and all of the goods imported from high risk countries.

As the risk of modern slavery was assessed as high, given the type of products JAG Australia is purchasing, due diligence will be conducted on these suppliers with the aim of understanding their modern slavery risk management practices (i.e. ethical sourcing policies).

#### *Next steps*

As part of JAG Australia's commitment to managing the risk of modern slavery in our supply chain, we will:

- Communicate the Modern Slavery Act's requirements to suppliers and update our supplier onboarding checklists to identify the level of risk. This will be used to request further due diligence on high risk suppliers.
- Engage with our top four suppliers in Australia on topics related to modern slavery, assessing whether they have adopted any ethical sourcing policies and whether they have published a modern slavery statement.

### **5.0 Ongoing Assessment of Modern Slavery Risk**

The process of developing our first modern slavery Statement has allowed JAG Australia to better understand potential risks of modern slavery occurring in our operations and supply chain. With strong existing policies and processes in place, and taking into consideration the outcomes of our modern slavery risk assessment, JAG Australia will be implementing additional controls and checks to better manage the risk of modern slavery.

We will also perform periodic reviews of our efforts to ensure they continue to be fit for purpose and effective. As we obtain more information on our potential risks, primarily within high risk areas in our supply chain, we will continue to implement policies and procedures as required to mitigate and address those risks.

### **6.0 Consultation**

As outlined in section 2 of this Statement, the Group CEO is responsible for the implementation of the organisational strategy and risk management plans. This Statement was prepared after assessing the impact on JAG Australia's operations and consulting with key stakeholders of all operating entities and departments within JAG Australia.

Going forward, and as we continue to enhance our efforts and processes relating to modern slavery, the Group will seek to strengthen its reporting by disclosing information relating to its overseas entities, their operations and supply chains. This will include consultation with key personnel throughout our overseas operations, including the development and approval of our future Statements.

The Statement has been reviewed and approved by the JAG Board of Directors, which oversees the operations of all subsidiaries within the Group.

### **7.0 Other Relevant Information**

#### ***COVID-19 impacts***

Due to the nature of our services, we continued to operate during the pandemic throughout Australia, in order to provide care to children of essential workers and disadvantaged children. As such, JAG Australia continued to engage its suppliers throughout the reporting period.

We did note some stock availability and supply disruptions throughout the period and understand the pressure that our suppliers may have faced in operating during the reporting period. We are also conscious

of the fact that these COVID-related issues may have increased the vulnerability of people at risk of modern slavery conditions throughout our supply chain.

Although JAG Australia's management faced added responsibilities as a result of responding to operational challenges posed by the impacts of COVID, we were nevertheless able to undertake all actions outlined in section 4 of this Statement to ensure that potential risks were managed to the best of our abilities.

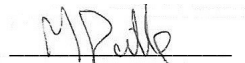
That said, we acknowledge that the pandemic is far from over and the impacts on vulnerable people will continue. We will continue to take this into account when working with our people and our suppliers to manage and mitigate modern slavery risks in going forward.

***Sign off***

This Statement has been prepared by JAG Australia's management team and has been approved by the JAG Board of Directors.



**Craig Napier**  
Group CEO



**Marcus Darville**  
Chair of the Board

**Junior Adventures Group**

Date: 27 May 2021