



Modern Slavery Statement

Camp Australia Pty Ltd (ACN 060 703 120)

July 2024 - 30 June 2025

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1. Introduction

This Modern Slavery Statement is prepared in accordance with the Modern Slavery Act 2018 (Cth) (the Act) and relates to the reporting period from 1 July 2024 to 30 June 2025.

CA Group Holdco Pty Ltd (ACN 95 663 533 195), as the reporting entity, lodges this joint statement on behalf of the Camp Australia group.

The reporting entities covered by this statement are:

- CA Group Bidco Pty Ltd (ACN 44 663 534 101)
- Spyder (BC) Holdco Pty Ltd (ACN 29 616 379 143)
- Spyder (BC) Midco Pty Ltd (ACN 616 379 867)
- Spyder (BC) Bidco Pty Ltd (ACN 616 297 904)
- Camp Australia Pty Ltd (ACN 060 703 120)
- Camp Australia Services Pty Ltd (ACN 158 075 837)
- The Camp Australia Foundation Ltd (ACN 153 730 940)
- Camp Australia Holdings Pty Ltd (ACN 160 199 306)
- CAIP Pty Ltd (ACN 147 444 399)

2. Our Business and Supply Chains

2.1. Structure

Camp Australia is a national provider of Outside School Hours Care (OSHC) and Holiday Care services, with more than 30 years of experience. As at 30 June 2025, the organisation operated a portfolio of 490 services across Australia.

2.2. Operations

Camp Australia is headquartered in Melbourne, Australia. As at 30 June 2025, approximately 176 employees were based in the head office, supported by a workforce of around 3,500 employees nationwide.

The organisation provides Before and After School Care, as well as Holiday Care programs, supporting both school-aged and pre-school aged children.

Camp Australia's vision, "To support all families in achieving their dreams," reflects its commitment to enabling working families, carers, and individuals requiring additional support with childcare.

Within school communities, Camp Australia contributes through the delivery of OSHC services that complement the school offering, alongside investment in facilities, resources, and workforce capability. Staff are supported through training in areas including autism support, additional needs, resilience, mindfulness, and positive psychology, supporting inclusive environments for children.

Engagement with stakeholders is guided by the principles of "Relationships Matter" and "Community Focused". Feedback from families, schools, and communities is actively sought and used to inform ongoing improvements.

Camp Australia promotes a culture of ethical behaviour, transparency, and open communication across its workforce. Key satisfaction measures across parents, principals, and employees have continued to show positive performance during the reporting period.

2.3. Supply Chain

Camp Australia's supply chain supports the delivery of its services and includes procurement of food, educational materials, technology, and operational support services.

The OSHC sector is generally considered to present a low risk of modern slavery. Camp Australia operates exclusively within Australia, which has a relatively low prevalence of modern slavery and a well-established regulatory environment.

The organisation's largest area of expenditure is employee remuneration. Other expenditure is primarily directed towards technology infrastructure, facilities, and operational support required to deliver services.

Direct suppliers are largely based in Australia and the Philippines. While Australia is considered low risk, some suppliers may source goods internationally, including from higher-risk regions. The Philippines-based provider is assessed as low risk due to Australian ownership and alignment with anti-modern slavery and trafficking frameworks.

3. Risks of Modern Slavery

Camp Australia has reviewed its operations and supply chains to identify potential exposure to modern slavery risks.

3.1. Operations

- Camp Australia employs a significant number of educators, some of whom may be more vulnerable or less familiar with their employment rights. These employees are covered by the Children's Services Award 2010 and the Education and Care Services National Law Act, which provide safeguards against exploitation.
- The organisation engages a managed operations provider in the Philippines to support its Global Support Centre, comprising approximately 139 employees.

3.2. Supply Chain

- Key suppliers are generally subject to the Act due to their size and scale.
- Certain goods procured may originate from jurisdictions with a higher prevalence of modern slavery. This includes items such as uniforms and technology equipment, particularly where manufacturing occurs in countries such as China.

4. Actions Taken to Address Modern Slavery Risks

4.1. Workforce

Camp Australia has assessed the potential for modern slavery risks within its workforce and identified the following controls:

- All operations are located within Australia, a low-risk jurisdiction
- Policies promoting ethical conduct are in place, including a Whistleblower Policy
- Employees have access to an Employee Assistance Program (EAP), providing confidential counselling and legal support
- The People & Culture function offers multiple support channels, including a hotline and structured onboarding processes
- A Health, Safety and Wellbeing Officer role continues to support employee wellbeing
- Employees in services are governed by the Children's Services Award 2010
- The Global Support Centre includes approximately 123 employees engaged through a managed provider.

Based on this assessment, the risk of modern slavery within the workforce is considered low.

4.2. Global Support Centre

The Global Support Centre has been assessed as follows:

- The provider is Australian-owned and employs approximately 4,000 staff
- It has supported Camp Australia since 2015
- It maintains an Anti-Modern Slavery and Trafficking in Persons Policy
- Contractual agreements include obligations aligned with the Act.

This workforce is assessed as presenting a low modern slavery risk.

4.3. Supply Chain

Camp Australia's primary supplier continues to conduct modern slavery risk assessments and has identified a low level of risk.

While there is less direct visibility over smaller suppliers, the limited scale and nature of goods and services procured indicates that overall supply chain risk remains low.

4.4. Audit & Risk Committee

The Audit & Risk Committee assists the Board in overseeing governance, risk management, and internal controls.

The Committee meets quarterly to review key business risks, including modern slavery. Current assessments indicate a low level of risk, which continues to be monitored. Where necessary, mitigation strategies are developed to address any changes in risk exposure.

5. Effectiveness of Actions

Although no instances of modern slavery have been identified within operations or supply chains, the actions undertaken during the reporting period have:

- Enhanced understanding of potential risk areas across the business
- Supported increased awareness of modern slavery risks among relevant personnel.

6. Consultation

This statement has been prepared in consultation with members of the Executive Leadership Team. Directors have also been involved in the review and approval of the statement.

This modern slavery statement was approved by the principal governing body of Camp Australia Pty Ltd as defined in the Modern Slavery Act 2018 (Cth) (“the Act”) on 22 December 2025.

This modern slavery statement is signed by a responsible member of Camp Australia Pty Ltd as defined in the Act.

A handwritten signature in black ink, appearing to read 'I. Merkin', with a horizontal line extending from the end of the signature.

Igor Merkin

Chief Financial Officer
Camp Australia Pty Ltd