



# Modern Slavery Statement for reporting period to December 2024

## January 2024 – December 2024

### About us

With over a decade of experience in early childhood education, Only About Children operates around 80 early learning and kindergarten/preschool campuses throughout Sydney, Melbourne and Brisbane. This breadth gives us the opportunity to provide high-quality early years education and care to over 8,000 families and employ over 2,000 people, whose skills, experience and passion help us to deliver on our mission to empower every child to reach their full potential.

It's our unique approach to childcare that gives children the platform they need to thrive. It's an approach that goes beyond education to encompass the health, development and total wellbeing of every child in our care.

In July 2022 Only About Children was acquired by Bright Horizons, a leading global provider of high-quality early education and childcare, Back-Up Care, and workplace education services.

Following the acquisition and based on the clear alignment of our core business values, we adopted the Bright Horizons HEART Principles, being the foundation of our culture and how we interact with one another when we are at our best. These values – Honesty, Excellence, Accountability, Respect and Teamwork – guide all of us in the work we do each day.

### Identify the reporting entities

- 1.1. This is a joint statement submitted in accordance with the *Modern Slavery Act 2018* (Cth) for the reporting period 1 January 2023 to 31 December 2023 on behalf of a group of entities ('OAC Group') that together comprise and operate the business '**Only About Children**'.
- 1.2. As at the end of the 2024 calendar year, BlueTang Holdings Pty Ltd (ACN 659 125 416) (a holding company) is a reporting entity, the Australian parent company and controlling entity in relation to the other reporting entities included in this statement, and submits this joint modern slavery statement on behalf of OAC Group.
- 1.3. Other reporting entities within OAC Group and included within this statement are:
  - 1.3.1. BlueTang Opco Pty Ltd (ACN 659 128 444) (a holding company)
  - 1.3.2. Nemo (BC) Holdco Pty Ltd (ACN 614 209 880) (a holding company);
  - 1.3.3. Nemo (BC) Midco Pty Ltd (ACN 614 211 219) (a holding company);
  - 1.3.4. Nemo (BC) Bidco Pty Ltd (ACN 614 212 716) (a holding company);
  - 1.3.5. OAC Group Pty Ltd (ACN 169 895 229); and
  - 1.3.6. Only About Children Pty Ltd (ACN 107 666 624).
- 1.4. This statement covers the activities of OAC Group as a corporate consolidated group, controlled by BlueTang Holdings Pty Ltd.

## Structure, Operations and Supply chain

### Our Corporate Structure

- 2.1. OAC Group is a group of privately owned Australian companies and trusts with the highest controlling and reporting entity being BlueTang Holdings Pty Ltd.
- 2.2. OAC Group is owned by the Bright Horizons business and the ultimate owner is now Bright Horizons Family Solutions Inc, a US listed entity.
- 2.3. In addition to the reporting entities listed, OAC Group includes several non-reporting entities, being subsidiaries or related bodies corporate to the reporting entities within OAC Group.
- 2.4. Together, these OAC Group entities operate our early years education and childcare business, Only About Children. Despite the multiple legal entities that sit within our structure, the business operates as a single operational brand, with uniform governance structures and policies in place across all entities.
- 2.5. In light of this structure, the operations and supply chains of the business are considered to be the same for all reporting entities (and non-reporting entities) within OAC Group. This statement considers the risks of modern slavery and responses to those risks for the business as a whole, as these are relevant to and similar for all entities within our corporate group.

### Our Operations

- 2.6. OAC Group operates in Australia, a country which has been assessed by the Global Slavery Index as having a lower prevalence of and a strong government response to modern slavery<sup>1</sup>. The business also operates in an environment with a robust regulatory framework under the Education and Care Services National Law and the National Quality Standard. Our operations extend to around 80 campuses across Sydney, Melbourne and Brisbane, providing early years education and care services to over 8,000 families and employing more than 2,000 people.

### Our Supply Chain

- 2.7. We note that the International Labour Organisation identified the following areas as high-risk sectors for modern slavery in supply chains<sup>2</sup>:
  - 2.7.1. Services (covering a wide range of economic activities including trade, transport, hospitality and non-market social and other services, but excluding domestic work (32%);
  - 2.7.2. Manufacturing (18.7%);
  - 2.7.3. Construction (16.3%);
  - 2.7.4. Agriculture (12.3%);
  - 2.7.5. Domestic work (8.2%);
  - 2.7.6. Mining and quarrying (1.4%); and
  - 2.7.7. Other (including begging and illicit activities) (11.1%).
- 2.8. Furthermore, in Australia, forced labour predominantly occurs in high-risk industries such as:
  - 2.8.1. Agriculture;

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<sup>1</sup> Global Slavery Index 2023, see Figure 1: Estimated prevalence of modern slavery by country and Figure 2: Government responses to modern slavery, [Global Findings | Global Slavery Index](#)

<sup>2</sup> Global Estimates of Modern Slavery: Forced Labour and Forced Marriage (2022) ILO, Page 31, Figure 8 <https://www.walkfree.org/reports/global-estimates-of-modern-slavery-2022/>

- 2.8.2. Construction;
  - 2.8.3. Domestic Work;
  - 2.8.4. Meat processing;
  - 2.8.5. Cleaning;
  - 2.8.6. Hospitality; and
  - 2.8.7. Food Services.<sup>3</sup>
- 2.9. We recognise the exposure to risk of modern slavery through imported products, with the top five most valuable products imported by Australia that are at risk of being produced under conditions of modern slavery being electronics, garments, solar panels, textiles and fish.<sup>4</sup>
- 2.10. OAC Group's supply chain consists of goods and services that support the provision of our early learning, educational and care services. Our greatest expenditure is in remuneration, and thereafter our supply chain is predominantly related to expenditure that provides the infrastructure, facilities and other support required to enable the delivery of our early learning and educational services.
- 2.11. To consider our risk profile relating to modern slavery we have identified the scope of our operations and the type of suppliers we engage and have identified the main, highest dependency areas as follows:
- 2.11.1. Landlords/leasing costs;
  - 2.11.2. Agency staffing;
  - 2.11.3. Insurance and professional services;
  - 2.11.4. IT equipment and services;
  - 2.11.5. Food supplies;
  - 2.11.6. Office supplies, equipment and consumables;
  - 2.11.7. Cleaning services;
  - 2.11.8. Building services, repairs and maintenance; and
  - 2.11.9. Utilities.
- 1.1. This analysis alerts us to the higher risks of modern slavery occurring within the operations of our tier one suppliers, predominantly in the cleaning and building services, as well as, potentially, agency staffing contracts. Further, we recognise the risk of modern slavery occurring within further tiers of our supply chain, particularly where purchasing imported products such as solar panels, IT equipment, garments and some food supplies.
- 1.2. Our suppliers operate in the following sectors:
- Accommodation and Food Service Activities
  - Administration and Support Services
  - Agriculture, Forestry, and Fishing
  - Arts, Entertainment and Recreation
  - Cleaning
  - Construction
  - Domestic work
  - Education
  - Electricity, Gas, Steam and A/C supply
  - Finance and Insurance

<sup>3</sup> Global Slavery Index 2023, Country Study, Modern Slavery in Australia, <https://www.walkfree.org/global-slavery-index/country-studies/australia/>

<sup>4</sup> Ibid, at Table 1: Imports of products at risk of modern slavery to Australia.

- Government administration, Defence and Social Security
- Health and Social Work
- Information and Communication
- International organisations, Diplomatic and Consular Services
- Maintenance and Repair of motor vehicles
- Manufacturing
- Personal services
- Professional and Scientific Services
- Real estate
- Retail
- Transportation and Storage
- Water supply, Sewerage and Waste Management
- Wholesale

1.3. Our suppliers operate in many locations across the world, including:

- Australia
- Austria
- Azerbaijan
- Bangladesh
- Barbados
- Belgium
- Cambodia
- Cameroon
- Canada
- China
- Congo (Democratic Republic of the)
- Curaçao
- Czech Republic
- Denmark
- Dominican Republic
- Finland
- France
- Germany
- Hong Kong
- India
- Ireland
- Italy
- Japan
- Jordan
- Kazakhstan
- Latvia
- Libya
- Macau
- Malaysia
- Netherlands
- New Zealand
- Nicaragua
- Norway
- Pakistan
- Papua New Guinea
- Philippines
- Poland
- Romania

- Saudi Arabia
- Senegal
- Spain
- Sweden
- Switzerland
- Tanzania, United Republic of
- Timor-Leste
- Uganda
- United Kingdom of Great Britain and Northern Ireland
- United States of America
- Uzbekistan
- Venezuela (Bolivarian Republic of)
- Vietnam
- Yemen

**Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.**

## Employees

## Agency Staff

there is less control over workers' terms and conditions and therefore an increased potential for these workers to be vulnerable to modern slavery risks.

### Acquisitions and Development

- 3.3. Our business continues to expand and grow the number of campuses operating under the 'Only About Children' brand. In doing so, we are acquiring existing businesses and assuming risks in relation to those businesses, including risks relating to modern slavery.
- 3.4. In addition to acquiring existing businesses, in this reporting period and going forward OAC Group are more actively pursuing growth opportunities through development of greenfield sites. We are mindful of the increased risk in the construction industry of modern slavery occurring.












### Our Supply Chain

- 3.5. Nearly all our suppliers are based in Australia, (with a small number based in developed countries such as the United Kingdom and New Zealand, being low risk for prevalence of modern slavery, particularly in the industries in which these suppliers operate). However, we are aware that some of our suppliers source goods or services from overseas, and this may include geographical locations or sectors with a higher risk of modern slavery.
- 3.6. Considering indicators from the Global Slavery Index 2023 and the International Labour Organisation's Global Estimates of Modern Slavery<sup>5</sup>, we have identified the following sectors within our supply chain that may have higher modern slavery risks:
  - 3.6.1. Cleaning services: through use of low-skilled or migrant workers;
  - 3.6.2. Electronics suppliers: noting that the manufacture of laptops, computers and mobile phones particularly in China and Malaysia are at high risk of modern slavery;
  - 3.6.3. Resources and garments: the products we purchase to furnish our campuses and equip our employees; and
  - 3.6.4. Construction and manufacturing: through use of migrant workers or temporary labour and subcontractors, as well as in the procurement of solar panels that have been installed at multiple campuses.
- 3.7. Our suppliers operate, produce, and source across several/ different sectors. Some of these sectors can be described as high-risk. High-risk sectors are those in which human trafficking activities are known to occur and were identified in the Global Estimates of Modern Slavery and child labour exploitation that were separately identified in Child Labour: Global Estimates 2020 Trends and the Road Forward (ILO and UNICEF, 2021).
- 3.8. The below graphics show the high-risk sectors of operation, production, and sourcing for our suppliers who completed a modern slavery risk assessment in the iPro Modern Slavery Risk Assessment Tool during this reporting period. The numbers in the following graphics describe how many suppliers are in the corresponding sectors.











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<sup>5</sup> References above within 'Our Supply Chain'.

### 3.8.1. Our Suppliers Operate in the following High-risk Sectors:











 Accommodation and Food Service Activities <b>6</b>	 Agriculture, Forestry, and Fishing <b>2</b>
 Cleaning <b>1</b>	 Construction <b>10</b>
 Domestic work <b>3</b>	 Maintenance and Repair of motor vehicles <b>1</b>
 Manufacturing <b>3</b>	 Personal services <b>1</b>
 Retail <b>13</b>	 Transportation and Storage <b>5</b>
 Wholesale <b>15</b>	

### 3.8.2. Our Suppliers Produce Goods and Provide Services in the following High-risk Sectors:

 Accommodation and Food Service Activities <b>5</b>	 Agriculture, Forestry, and Fishing <b>1</b>
 Cleaning <b>1</b>	 Construction <b>6</b>
 Domestic work <b>1</b>	 Manufacturing <b>4</b>
 Personal services <b>1</b>	 Retail <b>11</b>
 Transportation and Storage <b>1</b>	 Wholesale <b>11</b>

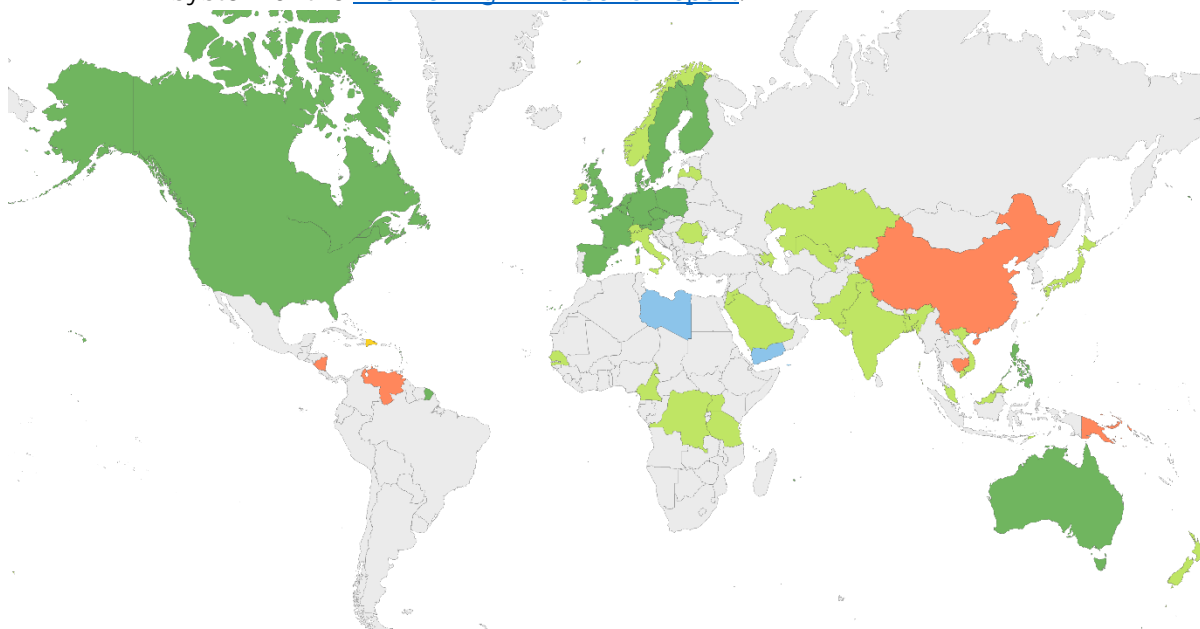


### 3.8.3. Our Suppliers Source Goods and Services from the following High-risk Sectors:

 Accommodation and Food Service Activities <b>5</b>	 Agriculture, Forestries, and Fishing <b>5</b>
 Cleaning <b>1</b>	 Construction <b>7</b>
 Maintenance and Repair of motor vehicles <b>2</b>	 Manufacturing <b>4</b>
 Personal services <b>1</b>	 Retail <b>12</b>
 Transportation and Storage <b>4</b>	 Wholesale <b>16</b>

3.8.4. Some countries or regions where our suppliers operate can be described as high-risk due to the possibility of a link to human trafficking.

3.8.5. The geographical regions where our supply chain partners operate are shown in the map below. This map has been overlaid with the colour tier system of the [Trafficking in Persons Report](#).

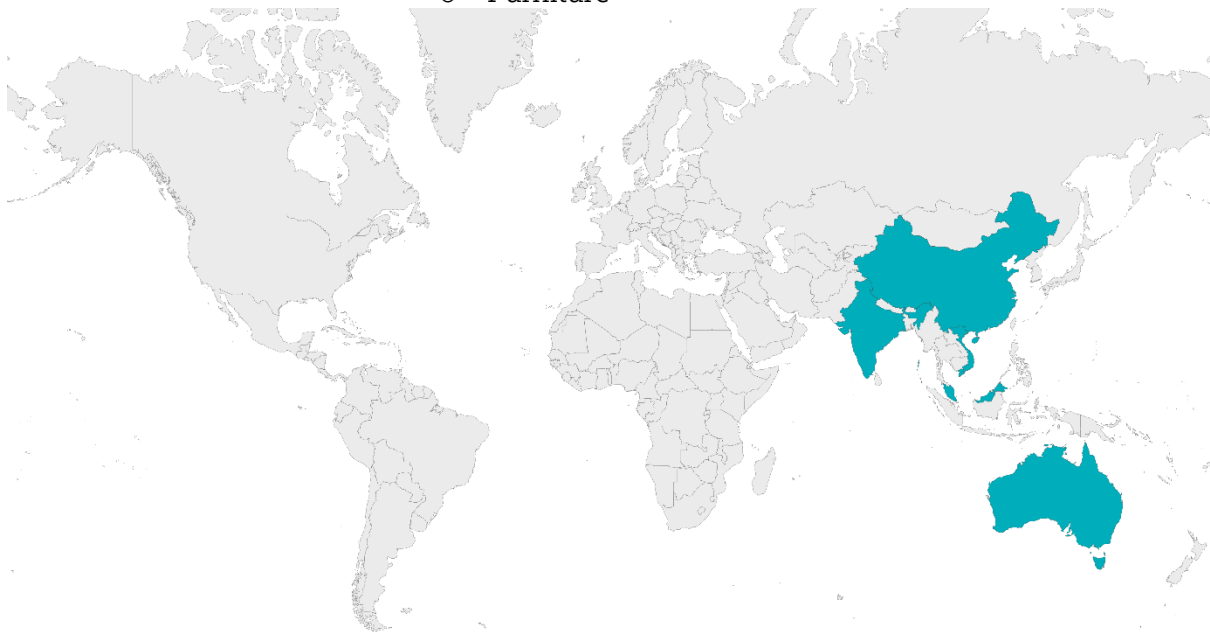


3.8.6. Some goods and services produced and sourced by our suppliers can be described as high-risk due to the possibility of a link to modern slavery practices such as forced labour and child labour.

3.8.7. The geographical regions where our supply chain partners produce and source goods and services that are considered high risk are shown in the maps below.

3.8.7.1. There is modern slavery risk associated with **producing** the following goods and services from the countries below:

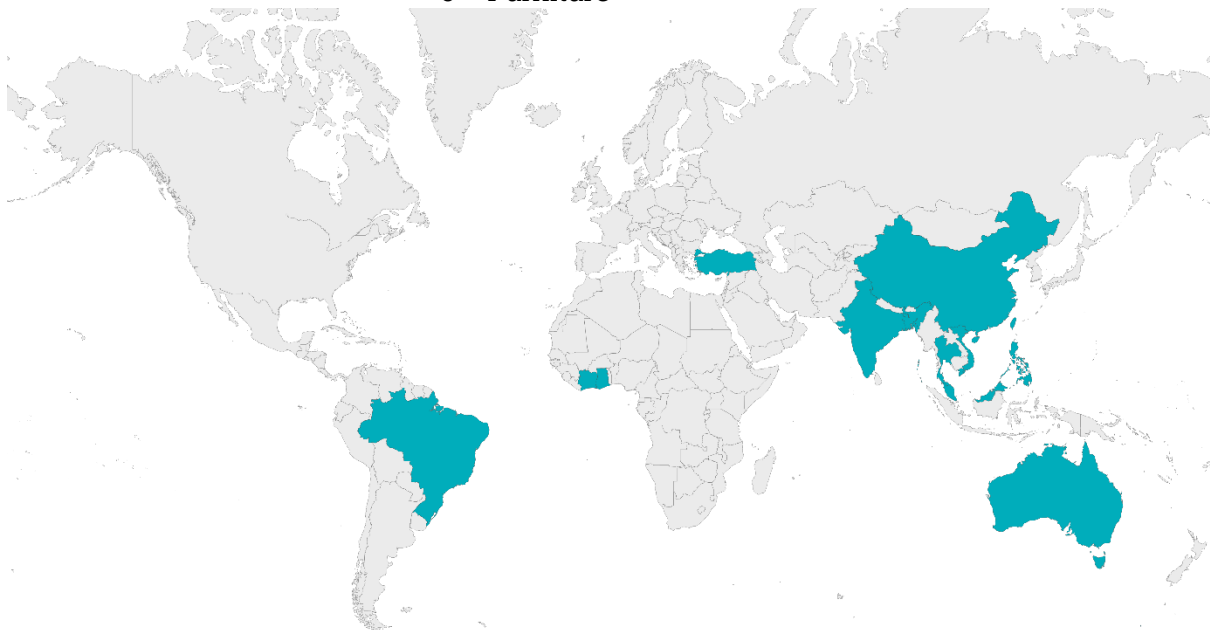
- Australia
  - Cleaning
- China
  - Electronics
  - Gloves
  - Toys
- India
  - Soccer Balls
- Malaysia
  - Rubber Gloves
- Vietnam
  - Furniture



3.8.7.2. There is modern slavery risk associated with **sourcing** the following goods and services from the countries listed below:

- Australia
  - Cleaning
- Bangladesh
  - Footwear
  - Garments
  - Textiles
- Brazil
  - Coffee
- China
  - Christmas Decorations
  - Cotton
  - Electronics
  - Footwear

- Garments
  - Gloves
  - Textiles
  - Toys
- Cote d'Ivoire
  - Cocoa
- Ghana
  - Cocoa
- India
  - Cotton
  - Garments
  - Rice
  - Soccer Balls
- Malaysia
  - Rubber Gloves
- Philippines
  - Coconuts
- Taiwan
  - Fish
- Thailand
  - Fish
  - Shrimp
- Turkey
  - Hazelnuts
  - Pulses (legumes)
- Vietnam
  - Cashews
  - Fish
  - Furniture



#### 4. Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.

- 4.1. Modern slavery refers to various forms of exploitation and coercive practices that deprive individuals of their freedom, rights, and dignity. It encompasses situations where individuals are forced or coerced into labour, servitude, or human trafficking against their will. Modern slavery can take different forms, including forced labour, debt bondage, forced marriage, human trafficking, and child labour.
- 4.2. The International Labour Organisation estimates that over 50 million people around the world are victims of modern slavery. In recent years, supply chain transparency is a key policy strategy used by governments to identify and prevent business practices that lead to modern slavery.

#### *Our Operations*

##### *Employees*

##### *Policies, Employee Assistance Program and Whistleblower Hotline*

- 4.3. The business maintains policies and procedures to grow awareness and strengthen the remediation processes in place to address adverse human rights impacts. All policies explicitly identify the risks of modern slavery practices and include mechanisms for reporting any instance or suspected instance of modern slavery. We review these regularly to ensure they are fit for purpose and updated as required.
  - 4.3.1. These policies include:
    - A Modern Slavery Policy, published on our website for visibility to suppliers, our families and any third parties, and communicated to all employees to ensure their awareness and compliance;
    - Code of Ethics and Conduct;
    - Grievance and Dispute Resolution Policy;
    - Whistle Blower Policy; and
    - Dealing with Complaints Policy, which is also made available to the families we provide our services to.
- 4.4. All employees have access to an Employee Assistance Program (EAP), providing confidential counselling and assistance at no cost. Our employees are advised of the existence of the EAP when commencing employment and reminded of this resource on a regular basis. The monthly reports we receive from our EAP provider confirm that this service is actively used by our employees.
- 4.5. The business operates an anonymous whistleblower hotline that employees can access via the web and toll-free telephone line. This improves trust with reporters and provides an easy-to-use interface for employees. It also provides the business with an effective case management system.

##### *Education and Training*

- 4.6. At the forefront of our messaging to employees is that we have a zero-tolerance approach to modern slavery. As referenced above, we have a suite of policies, including a bespoke Modern Slavery Policy, which employees are all required to review and acknowledge understanding and acceptance of when commencing employment.
- 4.7. We also have a dedicated Modern Slavery Online Module with a compulsory assessment to be passed for successful completion. The module is contained within an

online learning system, OAC Academy, that generates reminders to learners who have not yet or failed to complete their assigned learnings. This training is required of all roles within the support office and was, until September 2024, also delivered to Campus Directors. As at 31 December 2024, there were 885 active employees who had been enrolled on the learning module and 94% had completed the module. The target completion rate is 95%.

- 4.8. In this reporting period we aimed to develop a new compliance module on our Code of Ethics and Conduct that includes modern slavery, which will be mandatory for all employees, including casual employees, for completion on induction. This was delayed but will be progressed in the next reporting period.
- 4.9. In the next reporting period we will enhance our Child Protection training and emphasise our commitment to zero-tolerance of child abuse, reminding our staff as mandatory reporters to report concerns relating to children at risk.

#### *OAC Remuneration*

- 4.10. While the childcare industry saw workforce shortages following the COVID-19 pandemic, we consider the risk of modern slavery occurring to be lessened, as workers are in high demand and able to command better terms for their employment.
- 4.11. OAC ensures compliance to Australian workplace laws and is committed to providing workers at least the minimum employment conditions and pay standards.
- 4.12. During this reporting period, the Federal Government approved OAC's application to receive a Worker Retention Payment, allowing OAC to pay this additional allowance to all its permanent and casual team members within OAC campuses.

#### *Agency Staff*

- 4.13. We maintain a dedicated casual employee recruitment function in-house and a large pool of employees on casual employment contracts to fill our shifts. Our casual employees are onboarded in alignment with our permanent employees.
- 4.14. Where we are unable to use our own employees, we use agency staff from reputable and sector-specific agencies, who have the required qualifications and training for the role. The relationships between Only About Children and the agencies we use are managed as part of our supply chain, with appropriate due diligence measures in place.
- 4.15. The workforce shortages experienced during prior reporting periods (since the pandemic) have continued into this reporting period. As a result, we are more heavily reliant on agency staffing contracts. While the findings of an audit conducted on our agency contract terms were favourable, we recognised an opportunity to further strengthen compliance and reduce modern slavery risks by introducing consistent and robust terms across all recruitment agency partners. In 2024, we implemented a standard service agreement for all panel agencies, requiring explicit compliance with modern slavery laws, a prohibition on the charging of recruitment fees to workers, and obligations to actively prevent and report any suspected instances of modern slavery. This initiative has enhanced consistency, transparency, and accountability in our agency partnerships.

#### *Acquisitions and Development*

- 4.16. Our legal, human resources and acquisitions teams work together through the due diligence process to ensure that modern slavery risks are identified at the commencement of any acquisition process. Particularly, employee contracts and existing supplier contracts are scrutinised for any modern slavery risks. Working

conditions and working rights of employees authorised to work under a work visa are also closely reviewed and referred to our external immigration agency when required. We ensure that any risks are appropriately addressed and include contractual obligations relating to anti-slavery laws within the transaction agreements.

- 4.17. In building new childcare centres we are working with reputable landlords and developers that we have had long-standing and prior dealings with. During this reporting period we drafted a clause relating to modern slavery obligations for inclusion in agreements for lease and leasing documentation negotiated in the future.

## *Our Supply Chain*

### *Supply Chain Due Diligence*

- 4.18. We use a third-party tool, the iPRO Modern Slavery Assessment Tool (MSAT) to assess modern slavery risks in our supply chain. The risks identified in the previous section (at 3.8) were identified utilising this assessment tool. We engaged iPRO during the reporting period to conduct a bulk assessment of 137 of our suppliers. We intend to carry this process forward as an annual assessment of our operations and supply chain.
- 4.19. Participating suppliers were asked to complete a self-assessment questionnaire online. After each supplier completed and submitted the questionnaire, their responses were assessed to determine their modern slavery risk scores and associated risk category.
- 4.20. Each supplier that completed the assessment was assigned one of the following risk categories:
- High-risk (high levels of inherent risk)
  - High-risk (inadequate risk control)
  - Medium-risk (partial risk control)
  - Low-risk (adequate risk control)
  - Low-risk (low levels of inherent risk)
- 4.21. To determine the appropriate risk category, responses were first evaluated for risks inherent to a supplier's operations, production, and sourcing. This is referred to as the Inherent Risk Score. The Inherent Risk Score was calculated based on the geographical, type of goods, industry sector, and workforce parameters that the supplier indicated in the MSAT.
- 4.22. Next, the Unmitigated Risk Score was evaluated. This score was calculated based on the policy and procedure responses on the questionnaire. A supplier's Unmitigated Risk Score determined whether they were categorised as having inadequate, partial, or adequate risk control.
- 4.23. Then, the risk scores for each assessed supplier were aggregated and averaged, resulting in an Aggregated Inherent Risk Score and an Aggregated Unmitigated Risk Score for the overall supply chain.
- 4.24. Suppliers that completed the self-assessment were given action items to complete post-assessment. The action items provided to each supplier were based on their responses to the questionnaire, and if implemented, will reduce the unmitigated risks identified during the assessment.
- 4.25. Action items were also aggregated, giving OAC a focused view of the most impactful actions that could be taken by suppliers across the supply chain.
- 4.26. During this reporting period we also formalised a Third Party/Supplier Risk Management Policy and Standard that describes vendor assessment criteria and risk management for new and existing vendors. This includes the use of a specialised third party online platform to assess vendor compliance against industry standard for

information security requirements, where required. This is for any vendor that collects, stores, or processes personal or sensitive data and is in addition to the MSAT, which assesses, monitors and seeks to mitigate the modern slavery risks in our supply chain.

### *Contractual Clauses*

- 4.27. Our building works and contractor template agreements include the requirement for suppliers to comply with anti-slavery laws, with severe consequences for failure to do so. We have successfully engaged multiple suppliers using these template agreements. Our approach during negotiations with suppliers is that these are non-negotiable terms.
- 4.28. When presented with another party's agreement for negotiation and signature, if there are no terms to enforce zero tolerance of modern slavery, we insert a mutual clause for compliance to anti-slavery laws.
- 4.29. While we have implemented improvements to supplier due diligence by conducting modern slavery supplier risk assessments through the MSAT, we recognise that a response is not mandatory and accordingly response rates are reliant on the suppliers willingness to comply. During the 2024 reporting period we updated contractual clauses in our template agreements to include an obligation to comply with our due diligence requirements. We continue to negotiate this into all supply agreements that are not our standard.

### *Online Contractor Management Portal*

- 4.30. Our online portal in which contractors are required to undergo mandatory induction training includes modern slavery awareness training.

### *Continual Improvement*

- 4.31. Each reporting period we:
- continue to review our policies, documentation and training materials. This is done on an annual basis (unless required more frequently), with any updates or improvements implemented and communicated as necessary;
  - continue to deliver education and training initiatives within our operations, highlighting the risks of modern slavery and how to identify and report these; and
  - continue to drive awareness and education of modern slavery and our zero-tolerance approach with suppliers, by:
    - performing risk assessments on existing suppliers to monitor their modern slavery risks and actions related to these; and
    - requiring all contractors to undergo the modern slavery training on our online induction portal as part of their engagement with OAC Group.
- 4.32. In the next reporting period, we will:
- revise our eLearning compliance modules to include modern slavery within our Code of Ethics and Conduct training, for completion by all staff in induction;
  - implement improved Child Protection training, a Child Protection Commitment and Practice Guide for all employees to agree;
  - roll out a supplier follow-up initiative to further discuss the action items and address the risks identified through the MSAT. Primarily this will involve ensuring that suppliers have the right policies and procedures in place to mitigate inherent risks in their business; and
  - complete a risk assessment within the MSAT on our own operations and commence remediation to reduce risks of modern slavery.



## 5. Describe how the reporting entity assesses the effectiveness of these actions.

- 5.1. In each reporting period, we monitor the areas identified as risks in our operations and supply chain, noting the impact of any measures implemented in our previous reporting periods.

### *Our Operations*

- 5.2. Our focus on education, training and reporting mechanisms has enabled us to continue to engage our workforce and suppliers in raising awareness of modern slavery risks and practices. There were no reported instances of non-compliance with our updated policies relevant to modern slavery, nor any reports of modern slavery practices occurring.
- 5.3. In relation to our bespoke modern slavery online learning module our completion rate for the reporting period was 94%, tracking close to the target of 95%.

### *Our Supply Chain*

- 5.4. We utilise benchmarking and KPIs in the iPRO Modern Slavery Assessment Tool to assess the effectiveness of our actions. As this is the first year we have used the MSAT to conduct our assessments and due diligence, we will be able to objectively measure the effect when the assessments are completed during the next reporting period.
- 5.5. The main KPIs we are using to benchmark our efforts are the risk scores that are generated as part of the assessment process.
- 5.6. Each organisation who completed the assessment questionnaire was assessed and given 2 risk scores:
- Inherent Risk Score; and
  - Unmitigated Risk Score.
- 5.7. The Inherent Risk Score measures modern slavery risks that are intrinsic/built-in to the operations of an organisation. This is determined by asking which countries, regions, sectors, and high-risk goods are part of their operations, production, or supply chain.
- 5.8. The Unmitigated Risk Score measures the organisations risk that is still present (remains) after accounting for modern slavery risk controls that have been implemented. This is determined by asking suppliers about the policies, processes, and procedures in place to reduce modern slavery risks.
- 5.9. OAC is provided an aggregated risk score of all the assessed suppliers, and we use this aggregated score to measure the risk on an overall supply chain level.
- 5.10. We aim to continuously improve on these KPI's.
- 5.11. As we take actions within our organisation, and with our suppliers, we will be able to assess the effectiveness of our modern slavery action plan to reduce the Unmitigated Risk Score by introducing relevant policies and procedures.
- 5.12. We will continue to encourage participation in our assessment program to better identify and mitigate modern slavery risks in our supply chain.

### *Reporting Period KPIs*

- 5.13. This is the score for OAC's supply chain:

Supplier Assessment Completions	
Completions	83 / 137
Completion Rate	60.6%



Aggregated Supply Chain Risk Scores	
Inherent Risk Score	26.33 / 100
Unmitigated Risk Score	22.92 / 100
Currently, our suppliers are evenly distributed between the risk categories of Low-Risk (No inherent risk) and Medium-Risk (Partial risk control).	

### Generally

5.14. We promote continual review and improvement of measures to reduce modern slavery risks, ensuring that our actions can be more effectively assessed. The legal team has responsibility for managing the modern slavery compliance process and comprises the basis for a working group (that includes relevant departmental representatives as required), to assess and action modern slavery risks. All legal/working group actions are reported to the Executive Leadership Team ('ELT') who are responsible for ensuring corporate governance and compliance systems are maintained within the OAC Group, to support the wider Bright Horizons compliance and public reporting to the U.S. Securities and Exchange Commission. This framework is represented in the diagram below:



5.15. The reporting framework outlined above has proven to be an effective means of managing risks and monitoring effectiveness of actions within the OAC Group, with support and transparency throughout the business and to management.

## 6. Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls

6.1. Members of the ELT (being senior and executive management, representing all entities in OAC Group) are aware of and discuss the reporting requirements under the Modern Slavery Act 2018 (Cth), the risk framework of the business and actions being taken to ensure that the business is actively working towards identifying and mitigating the risks of modern slavery in our operations and supply chain.

- 6.2. The ELT includes at least two representatives from all OAC Group entities' boards of directors. Through this collaboration the group is instrumental in considering and shaping the governance and controls relating to modern slavery risks as part of the overall risk management framework.
- 6.3. Together they contribute to developing the content of the Modern Slavery Statement, which is approved and recommended for signature by the ultimate parent entity, for submission on behalf of the OAC Group.
- 6.4. Accordingly, the process of consultation is effectively joint among the OAC Group entities, with knowledge of, and contribution to, the development of the statement across all entities.

## **7. Any other information that the reporting entity, or the entity giving the statement, considers relevant.**

- 7.1. No further information of relevance.

### **Approval**

This modern slavery statement was approved by the board of BlueTang Holdings Pty Ltd as the parent entity on 25 June 2025.

This modern slavery statement is signed by a responsible member of BlueTang Holdings Pty Ltd as defined in the Modern Slavery Act 2018 (Cth).



Lidia Valenzuela  
Director