



green leaves
EARLY LEARNING



MODERN SLAVERY STATEMENT

FOR THE PERIOD 1 JULY 2021 TO 30 JUNE 2022

Green Leaves HoldCo Pty Ltd (ACN 655 049 120)

MODERN SLAVERY STATEMENT

For the period 1 July 2021 to 30 June 2022

1 – Introduction and description of the reporting entity

Green Leaves HoldCo Pty Ltd (ACN 655 049 120), and its subsidiaries, have a registered office at Unit 3, 8 Miller Street, Murarrie QLD 4172. Please refer to appendix for list of all subsidiaries.

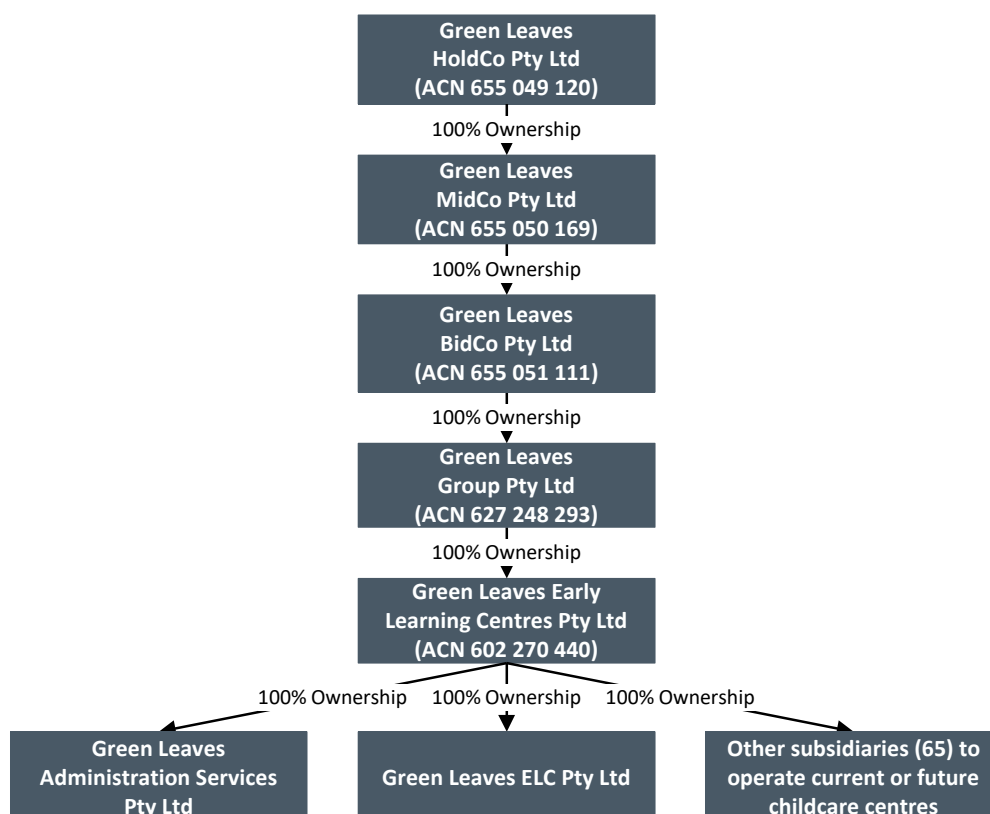
Green Leaves is committed to limiting the risk of modern slavery occurring within its own business, infiltrating its supply chains or through any other business relationship. Green Leaves is deemed a Reporting Entity as per section 5.1 of the Modern Slavery Act 2018 (Cth) ('the Act') and makes this statement under Section 13 of the Act.

2 – Description of activities

Structure and operations

Structure

Green Leaves is a privately held Australian group and the ultimate holding company is Green Leaves HoldCo Pty Ltd. The business trades via multiple 100% owned subsidiaries and together these entities operate the childcare business, Green Leaves. Although the group trades via multiple subsidiaries, the group operates as a single brand, with uniform governance structures, procedures and policies. The diagram below summarises the corporate structure of Green Leaves.



Operations

Green Leaves was founded in 2014 with a purpose to provide early education and care that exceeds traditional care and education standards. Green Leaves provide learning journeys that are age-appropriate, flexible educational programs that are customised to suit each child's knowledge, strengths, culture, abilities and interests. The children attending a Green Leaves centre are generally between 6 weeks and 6 years of age.

Green Leaves operates 46 childcare centres across Australia as at 30 June 2022. The below diagram summarises the geographical locations of Green Leaves.

Our Centres

NOW OPEN

WESTERN AUSTRALIA

Byford
Gwelup
Joondanna
Parkwood
Wanneroo

SOUTH AUSTRALIA

Mawson Lakes
Newton
Seaford Heights
Seaford House
Seaford Meadows
Valley View

46

OPEN CENTRES



QUEENSLAND

Albany Creek
Ashgrove
Ashgrove Cottage
Cannon Hill
Carindale
Chapel Hill
Forest Springs
Griffin
Kenmore
Kiwan
Margate
Mount Pleasant
Murrumba Downs
Newport
North Shore
Oceanside
Pelican Waters
Reedy Creek
Richlands
Warner Lakes

NEW SOUTH WALES

Albury
Moonee Beach
Port Macquarie

VICTORIA

Cairlea
Cloverton
Craigieburn
Forest Hill
Highlands
Horsham
Knox
Richmond
Waverley Gardens
Wendouree

TASMANIA

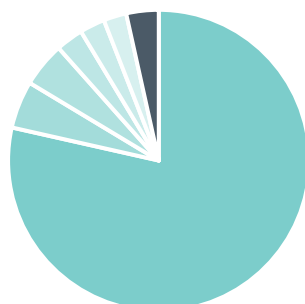
Bellerive
Launceston

In addition to the above locations, Green Leaves has a centralised Support Office located in Brisbane, Queensland. The Support Office provides assistance to the centres in relation to Operations, Family Care, Maintenance, Marketing, Human Resources and Finance.

Employees

Green Leaves has over 1,600 employees, the majority of whom are educators and early childhood teachers. Employees are engaged on either full-time, part-time or casual basis. The key modern awards for the sector are the Children's Services Award and the Educational Services (Teachers) Award. Below is a breakdown of employees by role, noting that some roles have been grouped for the purposes of reporting.

Employees by Role



- Educators
- Early Childhood Teachers
- Kitchen staff
- Centre Directors
- Centre Administrators
- Assistant Directors
- Support Office

Supply chain

Green Leaves has a centralised Support Office located at the registered office. Group procurement is controlled by Key Management Personnel located at the Support Office. Procurement decisions relating to day-to-day operational inputs are made by Centre Directors located at each business location, with oversight from the Support Office.

Green Leaves' supply chain consists of goods and services that support the provision of childcare services. Employee remuneration is the largest expenditure category. After employee costs, expenditure predominately relates to rent and other costs of providing services.

The main goods consumed are:

- Food supplies
- Learning resources for children
- Furniture such as tables and chairs
- ICT such as laptops

The main services consumed are:

- Cleaners
- Tradesmen and Gardeners
- Relief staff sourced from agency

3 – Risk assessment

Risk of Modern Slavery existing with operations and supply chain

Green Leaves procures a range of goods and services every year to carry out business functions and the majority of direct suppliers are located in Australia.

Supply chain – workforce

As Green Leaves is an early childcare provider, employee remuneration and associated costs account for approximately 70% of total expenditure. As all staff are sourced from Australia and recruitment is conducted through a rigorous process, this is considered as a low risk for modern slavery practices.

All employees are recruited through Green Leaves' inhouse recruitment programs and are vetted through Green Leaves' compliance and competency standards. International Visa holders are vetted and approved for work in Australia by the Department of Home Affairs to ensure compliance with their Visa terms and conditions. Green Leaves ensures that no employees are indentured or restricted and the only restrictions that may exist are imposed by the Department of Home Affairs on to Visa workers.

All staff are employed under contracts, which are based on awards or industry rates, and are provided additional loadings and benefits where applicable.

Green Leaves use agency relief staff when required and recognise that as there is reduced control over pay and conditions for agency relief staff, which introduces a potential modern slavery risk though the risk is moderate to low as activities are based in Australia. An analysis of current suppliers highlighted that only one had previously lodged a modern slavery statement. The remaining suppliers are either based in Australia or are multinational companies with offices in Australia.

Supply chain – other goods and services

The remainder of the goods and services consumed by Green Leaves make up a much smaller percentage of overall expenditure.

Green Leaves uses Australian businesses in its supply chain and therefore has a low risk to modern slavery exposure. Green Leaves takes further comfort in the low risk exposure as its largest suppliers are entities who produce their own Modern Slavery Statements.

While Green Leaves purchases uniforms through an Australian based supplier, it does not have oversight into the Tier 2 or Tier 3 downstream suppliers and this presents a potential modern slavery risk. Further, Green Leaves does not have a clear overview of Tier 2 suppliers. As such, Green Leaves may be inadvertently exposed to modern slavery risk through downstream international suppliers of goods and services.

The below table summarises the remaining goods and services.

Expenditure Category	Details of Tier 1 Suppliers	Do Suppliers lodge Modern Slavery Statements?
Food supplies and daily consumables	Key suppliers are large Australian companies or multinational companies with offices located in Australia.	Yes – all key suppliers lodge modern slavery statements.
Learning resources and equipment	Key suppliers are companies located in Australia.	No – key suppliers do not lodge modern slavery statements.
ICT	Key suppliers are large multinational companies with offices located in Australia.	Yes – all key suppliers lodge modern slavery statements.
Cleaners	Key suppliers are companies located in Australia.	No – key suppliers do not lodge modern slavery statements.
Uniforms	Key suppliers are companies located in Australia.	No – key suppliers do not lodge modern slavery statements.

4 – Actions

Actions taken to assess and address modern slavery risks

Green Leaves understands that Modern Slavery is a complex and global problem, transpiring in various forms. In order to actively identify and address Modern Slavery across its suppliers and employees, Green Leaves has taken the following actions over the reporting period:

- Training of Key Management Personnel in relation to modern slavery, to support better discussions with suppliers and procurement decision making.
- Proactively engaging with suppliers to ensure they align with Green Leaves' values in relation to modern slavery.
- Considered traceability of large Tier 1 suppliers own supply chain by examining their Modern Slavery statements.

Future actions to continue to improve modern slavery risk management

Green Leaves will continue to advance its Anti-Slavery initiatives by undertaking the following:

1. **Policies and procedures review** – Policy suite review to facilitate continuous improvement in the assessment and management of supply chain risks including Modern Slavery.
2. **Risk Assessment** – Expansion of risk assessments to determine extent of modern slavery risks beyond Tier 1 suppliers.
3. **Supplier engagement** – Green Leaves will continue to engage directly with suppliers to understand if suppliers have a proper understanding of modern slavery risks and controls in place to mitigate the risk of modern slavery within their own business.

5 – Assessing the effectiveness of the actions taken

Green Leaves will continue to assess the effectiveness of its actions through:

- regularly reviewing supplier compliance with modern slavery requirements, and
- reviewing all 'whistle-blower' feedback from staff.

Green Leaves will continue to work to prevent modern slavery and has a continual improvement approach to all business operations, to ensure the processes and policies remaining current and compliant.

6 – Consultation

The Directors and Key Management Personnel of Green Leaves HoldCo Pty Ltd and its subsidiaries have been consulted when preparing this Modern Slavery Statement.

This statement is made pursuant to the Act and constitutes Green Leaves HoldCo Pty Ltd's Modern Slavery Statement in respect of the year ended 30 June 2022. The Statement is approved by the principal governing body of Green Leaves HoldCo Pty Ltd, being its Board of Directors.



Mark McDonald-Smith
Chief Executive Officer
Green Leaves HoldCo Pty Ltd

APPENDIX

This Statement covers all trading entities owned or controlled by Green Leaves HoldCo Pty Ltd including:

- Green Leaves MidCo Pty Ltd (ACN 655 050 169)
- Green Leaves BidCo Pty Ltd (ACN 655 051 111)
- Green Leaves Group Pty Ltd (ACN 627 248 293)
- Green Leaves Early Learning Centres Pty Ltd (ACN 602 270 440)
- Green Leaves Administration Services Pty Ltd (ACN 602 273 585)
- Green Leaves ELC Pty Ltd (ACN 626 498 253)
- Green Leaves Developments No.1 Pty Ltd (625 498 253)
- Green Leaves (NSW4) Early Learning Centres Pty Ltd (ACN 613 615 517)
- Green Leaves (NSW5) Early Learning Centres Pty Ltd (ACN 618 241 964)
- Green Leaves (NSW6) Early Learning Centres Pty Ltd (ACN 625 862 384)
- Green Leaves (QLD) Early Learning Centres Pty Ltd (ACN 608 110 738)
- Green Leaves (QLD2) Early Learning Centres Pty Ltd (ACN 602 273 192)
- Green Leaves (QLD3) Early Learning Centres Pty Ltd (ACN 616 397 338)
- Green Leaves (QLD4) Early Learning Centres Pty Ltd (ACN 618 241 884)
- Green Leaves (QLD5) Early Learning Centres Pty Ltd (ACN 618 241 928)
- Green Leaves (QLD6) Early Learning Centres Pty Ltd (ACN 618 242 041)
- Green Leaves (QLD7) Early Learning Centres Pty Ltd (ACN 618 242 149)
- Green Leaves (QLD8) Early Learning Centres Pty Ltd (ACN 619 687 197)
- Green Leaves (QLD9) Early Learning Centres Pty Ltd (ACN 619 844 852)
- Green Leaves (QLD10) Early Learning Centres Pty Ltd (ACN 622 488 279)
- Green Leaves (QLD11) Early Learning Centres Pty Ltd (ACN 623 534 869)
- Green Leaves (QLD12) Early Learning Centres Pty Ltd (ACN 628 166 594)
- Green Leaves (QLD13) Early Learning Centres Pty Ltd (ACN 628 165 864)
- Green Leaves (QLD14) Early Learning Centres Pty Ltd (ACN 628 166 629)
- Green Leaves (QLD15) Early Learning Centres Pty Ltd (ACN 628 166 852)
- Green Leaves (QLD16) Early Learning Centres Pty Ltd (ACN 629 338 941)
- Green Leaves (QLD17) Early Learning Centres Pty Ltd (ACN 633 198 553)
- Green Leaves (QLD18) Early Learning Centres Pty Ltd (ACN 635 650 314)
- Green Leaves (QLD19) Early Learning Centres Pty Ltd (ACN 644 703 837)
- Green Leaves (QLD20) Early Learning Centres Pty Ltd (ACN 644 949 020)
- Green Leaves (QLD21) Early Learning Centres Pty Ltd (ACN 646 162 601)
- Green Leaves (QLD22) Early Learning Centres Pty Ltd (ACN 653 445 286)
- Green Leaves (QLD23) Early Learning Centres Pty Ltd (ACN 653 824 018)
- Green Leaves (QLD24) Early Learning Centres Pty Ltd (ACN 656 250 323)
- Green Leaves (QLD25) Early Learning Centres Pty Ltd (ACN 656 841 217)
- Green Leaves (VIC) Early Learning Centres Pty Ltd (ACN 608 145 464)
- Green Leaves (VIC2) Early Learning Centres Pty Ltd (ACN 608 039 096)
- Green Leaves (VIC3) Early Learning Centres Pty Ltd (ACN 608 039 112)
- Green Leaves (VIC4) Early Learning Centres Pty Ltd (ACN 602 273 030)
- Green Leaves (VIC5) Early Learning Centres Pty Ltd (ACN 618 241 982)
- Green Leaves (VIC6) Early Learning Centres Pty Ltd (ACN 618 242 069)
- Green Leaves (VIC7) Early Learning Centres Pty Ltd (ACN 618 532 031)
- Green Leaves (VIC8) Early Learning Centres Pty Ltd (ACN 622 582 343)
- Green Leaves (VIC9) Early Learning Centres Pty Ltd (ACN 627 792 349)
- Green Leaves (VIC10) Early Learning Centres Pty Ltd (ACN 654 260 367)
- Green Leaves (VIC11) Early Learning Centres Pty Ltd (ACN 659 153 223)
- Green Leaves (SA) Early Learning Centres Pty Ltd (ACN 608 078 477)
- Green Leaves (SA2) Early Learning Centres Pty Ltd (ACN 602 273 165)
- Green Leaves (SA3) Early Learning Centres Pty Ltd (ACN 607 657 376)
- Green Leaves (SA4) Early Learning Centres Pty Ltd (ACN 630 103 721)
- Green Leaves (SA5) Early Learning Centres Pty Ltd (ACN 630 103 847)
- Green Leaves (SA6) Early Learning Centres Pty Ltd (ACN 636 988 148)
- Green Leaves (SA7) Early Learning Centres Pty Ltd (ACN 639 483 766)
- Green Leaves (SA8) Early Learning Centres Pty Ltd (ACN 645 575 453)
- Green Leaves (SA9) Early Learning Centres Pty Ltd (ACN 646 805 950)
- Green Leaves (SA10) Early Learning Centres Pty Ltd (ACN 647 670 219)

- Green Leaves (SA11) Early Learning Centres Pty Ltd (ACN 649 816 651)
- Green Leaves (SA12) Early Learning Centres Pty Ltd (ACN 650 464 065)
- Green Leaves (SA13) Early Learning Centres Pty Ltd (ACN 651 452 612)
- Green Leaves (TAS) Early Learning Centres Pty Ltd (ACN 602 273 503)
- Green Leaves (WA) Early Learning Centres Pty Ltd (ACN 602 273 343)
- Green Leaves (WA2) Early Learning Centres Pty Ltd (ACN 630 103 874)
- Green Leaves (WA3) Early Learning Centres Pty Ltd (ACN 617 372 193)
- Green Leaves (WA4) Early Learning Centres Pty Ltd (ACN 630 103 892)
- Green Leaves (WA5) Early Learning Centres Pty Ltd (ACN 630 104 068)
- Green Leaves (WA6) Early Learning Centres Pty Ltd (ACN 639 480 792)
- Green Leaves (WA7) Early Learning Centres Pty Ltd (ACN 639 509 523)
- Green Leaves (WA8) Early Learning Centres Pty Ltd (ACN 649 815 476)
- Green Leaves (WA9) Early Learning Centres Pty Ltd (ACN 660 539 631)
- Green Leaves (ACT) Early Learning Centres Pty Ltd (ACN 602 273 218)
- Green Leaves (NT) Early Learning Centres Pty Ltd (ACN 602 273 398)