

Modern Slavery Statement

Reporting period ending 30 June 2024

Goodstart Early Learning Limited
ACN 139 967 794





Acknowledgement of Country

Acknowledgement of Country Goodstart Early Learning acknowledges all Traditional Owners across Australia and recognises all First Nations peoples continued cultural and spiritual connection to the land, sky and waterways that surround us. We pay our respects to Elders past and present.

Goodstart's national support office is in Murarrie, Meanjin / Magandjin (Brisbane), and we acknowledge the Yuggera and Turrbal people as the Traditional Custodians of the lands. We pay our respect to the Yuggera and Turrbal peoples and their Elders past, present and emerging. Goodstart acknowledges that these lands have been places of teaching and learning for thousands of years and home to the longest continuing culture on earth.

Through our work with children, families and communities we seek to listen, learn and deepen our understanding and respect of First Nations cultures, tell the true stories of Australia's history, and to care for the land on which we live, work, play and learn.

Message from the CEO

As an organisation, Goodstart respects human rights and is committed to ensuring there is no modern slavery or human trafficking in our supply chains or in any part of our business.

Our commitment is on behalf of our 16,000-strong team, as well as the thousands of children and families we support in our centres across Australia.

In line with our core values and social purpose, we strive to always act ethically and with integrity across all aspects of our business. As part of this we take an ongoing and collaborative approach to identifying risk areas and we have embedded a culture of awareness and safety within our teams and throughout our operations. At Goodstart, safety is at the heart of everything we do, including the protection of vulnerable individuals. Empowering all children and Goodstarters to feel safe and be safe is fundamental to who we are and what we do.

We acknowledge that responding effectively to modern slavery requires collaboration and communication with our stakeholders and we are committed to operating honestly and transparently.

We will continue to advocate to government and to the wider Australian

community, especially where we believe changes should be made to support children experiencing disadvantage and vulnerability, which includes the abolition of modern slavery.

This Statement outlines the risks we have identified, actions we have taken and how we will continue to strengthen the effectiveness of our commitment to meeting modern slavery requirements.

Dr Ros Baxter

Chief Executive Officer and Executive Director, Goodstart Early Learning Limited

1. About Goodstart

We understand the power of early learning – it's why Goodstart makes every moment count for the children attending our centres. We advocate for greater access and participation, and we make it our business to be the best at getting better.

For 14 years Goodstart, as a not-for-profit social enterprise, has been creating positive social change by giving Australia's children, especially our most vulnerable, the best possible start in life through access to high quality early learning.

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

Today, Goodstart is Australia's largest provider of early learning and care and Australia's largest non-government provider of preschool and kindergarten programs.

We employ 16,000 people including 2,000 teachers and provide high quality early learning to more than 61,000 children from 51,000 families across 653 early learning centres. Around one third of our centres support children living in regional and rural areas, and around one third of centres are in low socio-economic areas (SEIFA 1-2).

2. 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-Profits Commission.

Goodstart's wholly owned and/or wholly controlled subsidiaries ("Subsidiaries") during the reporting period 1 July 2023 to 30 June 2024 ("the reporting period") were GS Admin Services No 1 Pty Ltd ACN 169 578 796, Goodstart Early Years Ltd ACN 133 530 364 and Big Fat Smile Group Limited ACN 002 796 232, (together referred to as "the Goodstart Group" or "us" or "we" or "our"). Goodstart Early Learning Limited is the primary operating entity in the Goodstart Group and is the chief acquirer of goods and services. There are common appointee directors across all Subsidiary companies.

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

The Goodstart Group's modern slavery compliance program and this Statement have been developed in consultation with all Subsidiaries in the Group. Goodstart's procurement team have liaised with senior management of the Subsidiaries (where this differs to Goodstart's management) to ensure a consistent approach to the mapping of supply chains and carrying out of due diligence, remediation, and training programs. Consultation regarding modern slavery requirements and the content of this Statement has also occurred at board level between Goodstart executives and company officers and the respective boards of directors of the Subsidiary companies.

All Boards of Directors in the Group have been updated on the reporting and compliance requirements for the Goodstart Group under the Act.

3. 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.

At 30 June 2024, Goodstart:

- > Operated 653 Goodstart branded centres, with centres in each State and Territory
- > Employed 16,000 staff
- > Cared for 61,000 children
- > Engaged with 51,000 families.

At 30 June 2024, Big Fat Smile:

- > Operated 36 Big Fat Smile branded centres including long day care community preschools, term-only preschools, and fun clubs
- > Employed 570 staff
- > Cared for 4,200 children
- > Engaged with 3,075 families.

Further information about our operations can be found in the [FY24 Goodstart Annual Report](#) and [FY24 Big Fat Smile Annual Report](#).

4. Our supply chain

Goodstart manages approximately 216 suppliers, with a combined total spend of more than \$433 million in the financial year ending 30 June 2024. All Goodstart key supply arrangements are governed by negotiated written agreements that are reviewed by Goodstart's legal advisers and executed in accordance with a well-defined governance and delegations' framework.

The following categories have been generally identified as potential for modern slavery risk in supply chains.

Category	Regions Sourced / Manufactured
Cleaning	Australia
Educational Resources and Furniture	Asia, Europe, North America
Facilities Management - Property Repairs and Maintenance	Various
Groceries	Various
ICT Hardware	Asia
ICT Software / Services	Africa, Asia, Australia, Europe, North America
Marketing	Australia, Asia
Motor Vehicles	Asia
Pre-prepared Food	Australia
Property – Construction, Landscaping	Various
Recruitment	Australia
Safety / Quality	Australia
Stationery, Nappies, Hygiene and Chemical	Asia, Australia, North America
Telecommunications	Australia
Uniforms	Asia
Utilities	Australia

5. Modern Slavery Risks

The following modern slavery risks have been identified within our operations and supply chain:

5.1 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, the presence of unions to represent employees, and our employees undertaking work in environments where there are established industrial policies and processes. There has been no change to Goodstart's assessment of the risk of modern slavery practices in our workforce for the present period.

5.2 In our supply chain

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

The 2023 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 continue to be electronics (such as laptops, computers, and mobile phones) and garments with most of these products imported from Asia. The prevalence of modern slavery throughout Asia varied between countries but was generally high.

The areas where Goodstart is most likely to be linked to modern slavery are the purchase of educational resources, furniture, marketing merchandise, uniforms and ICT hardware originating in Asia.

6. 2023-2024 assessment of supply chain risks

During the reporting period up to June 2024, Goodstart surveyed suppliers, including those in high-risk categories and high-risk geographical areas, as well as those with whom we spend more than \$300,000 annually. In FY24, we partnered with EthixBase360 to manage the distribution, collation and monitoring of our third-party suppliers through their online questionnaire. The questionnaire shared was developed by Norton Rose Fulbright lawyers who have extensive experience in human rights and related environmental, social and governance (ESG) issues.

6.1 Results of questionnaire

Of the 54 supplier self-assessment due diligence questionnaires distributed:

- > Approximately 91% of suppliers (49 of 54) responded with a completed questionnaire.
- > For the 30 suppliers who traded goods and services with Goodstart of more than \$1 million, 86% (26 of 30) provided a response to the questionnaire. The remaining four suppliers continued to lodge their Modern Slavery Statements through the government register, and based on their submissions their modern slavery risk is deemed low.

Of the 49 questionnaires completed in the 2023-24 period, only two responses came back that required further investigation. This is a 75% reduction of risks identified from the 2022-2023 reporting period.

These suppliers were flagged due to their category/industry of operation, potential risk within their workforce and the potential risk of their business operations (being overseas). The respective contract managers for the suppliers in question will continue to explore, collaborate and educate suppliers on how to address and mitigate these areas of concern.

7. Ongoing due diligence and remediation

During the 2023-24 reporting period, Goodstart focused on strengthening collaboration with suppliers to ensure they met our modern slavery requirements. The Modern Slavery Working Group, which includes internal representatives from key departments such as Procurement, Legal, Property, IT, Marketing, and Big Fat Smile, continues to meet bi-monthly. These meetings allow us to identify and address potential modern slavery risks, while also enhancing the understanding of modern slavery among both internal stakeholders and suppliers. This ongoing effort reinforces Goodstart's focus and priority on mitigating modern slavery through our supply chains.

7.1 Operational due diligence

Goodstart continues to take a risk-based approach to addressing modern slavery, focusing on large suppliers and the primary sites of manufacturing within their supply chains. Suppliers identified within these categories are closely monitored. During the reporting period, Goodstart took additional steps to assess and mitigate modern slavery risks across its operations.

7.1.1 Modern Slavery Risk Management questionnaire platform

During this reporting period, we enhanced our modern slavery survey of suppliers by transitioning from an internally designed questionnaire to the EthixBase360 software platform. This platform offers best-practice surveys and reporting tools, enabling more efficient surveying, automated communications, and streamlined data collection for best-practice scoring methodologies, helping us identify high-level risk ratings and specific risk areas. The resulting data allows Goodstart to focus on addressing key concerns and seek clarity on actions taken to mitigate identified risks.

7.1.2 Education, awareness and communications

We continue to provide opportunities to increase Goodstart employee awareness about the prevalence and nature of modern slavery risks within our supply chains as an important component of our strategy.

During the reporting period, we continued to deliver our modern slavery eLearning module for all Goodstart employees. The scheduling of this training coincides with the International Day for the Abolition of Slavery on 2 December of each year.

The eLearning module provides an overview of modern slavery, the role our business has in

eliminating this practice, and how individual Goodstarters can respond to concerns around modern slavery. It provides an introductory awareness to Goodstart's modern slavery focus in our policy framework, responsibilities of staff, and practical daily life examples of how suspicions of modern slavery experienced in our workplaces can be reported for follow up action by Goodstart. The eLearning module was also provided to all suppliers.

7.1.3 Modern slavery working group

Our Modern Slavery Working Group continues to lead our response to the requirements of the Act. The group's composition broadly reflects our business activities, with a particular focus on areas most relevant to modern slavery risks. The group meets bi-monthly to monitor progress, plan initiatives, and take action as needed.

7.1.4 Policy framework development

Key policies remain in place to support the management of Goodstart's modern slavery requirements:

- > Modern Slavery Requirement
- > Credit Cards Requirement
- > Procurement and Contracts Management Policy
- > Code of Conduct Policy
- > Whistleblower Policy.

7.1.5 Risk monitoring and Board oversight

Modern slavery risks in Goodstart's supply chain were incorporated into Goodstart's corporate risk register under the category of Third-Party Enterprise Risk and these risks and risk ratings are reported quarterly as part of Goodstart's corporate risk management framework. This includes tracking key risk indicators (KRIs) related to modern slavery and implementing corrective actions for any identified risks. The executive management team and Board are regularly updated on mitigation strategies, ensuring accountability and timely response to emerging risks.

7.2 Supply chain due diligence

Goodstart continued to assess and mitigate modern slavery risks in our supply chain during the reporting period by:

- > 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 "Request for Proposal" documents issued by Procurement and/or activity overseen by Procurement. This is included as part of the supplier pre-qualification steps in submissions.

- > The review of all new contracts for supplies and suppliers of goods and services to Goodstart by our in-house lawyers to ensure that legal provisions are included to ensure adherence to modern slavery laws and access to information regarding supply chains.

7.2.1 Mapping our Subsidiaries supply chain

In the 2020-21 reporting period, Big Fat Smile was added to Goodstart's FY21 Modern Slavery Statement. Goodstart engaged with Big Fat Smile to gather information about their supply chain, and this collaborative effort continued through the 2023-24 period. As a result, Big Fat Smile's supply chain is now aligned and integrated into Goodstart's broader supply chains and procurement processes.

7.2.2 Modern Slavery Terms in all new General and ICT Goods and Services Supply Contracts

Goodstart's standard goods and services supply agreement used for general and ICT procurement contain comprehensive modern slavery provisions. Additionally, Goodstart has established standard legal procurement requirements for new supplies and suppliers of goods and services to Goodstart which require minimum contractual provisions confirming compliance with modern slavery laws and ensuring access to information regarding supply chains in third party contracts. During the reporting period Goodstart entered into four major legal agreements for the supply of goods or services, which included the negotiation for inclusion of acceptable terms with respect to modern slavery laws, reporting and risks, in all such contracts.

7.2.3 Expansion of scope

Goodstart is committed to enhancing our due diligence and investigative processes to expand our supply chain review over the next two years. By June 2025, we will require all suppliers with an annual spend exceeding \$250,000 to complete the Modern Slavery Questionnaire on an annual basis. This will help ensure we maintain robust oversight and accountability across our entire supply chain.

8. Grievances and remediation processes

Goodstart is committed to protecting and respecting 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.

We have strong, confidential reporting channels in place for both employees and third parties, allowing for anonymous reporting of suspected or actual human rights violations. All reports related to modern slavery are thoroughly investigated, and if any risks are identified as critical, the matter is escalated to the Board. Corrective actions and remediation steps are swiftly implemented, with follow-up audits scheduled to assess the effectiveness of these measures.

Goodstart's Whistleblower Policy offers a confidential channel for employees, suppliers, contractors, and their employees to report suspected misconduct anonymously, without fear of retaliation. Any reports received will be managed by Goodstart's designated Whistleblower Protection Officers, where appropriate, and investigated.

Where risks or issues are identified in our operations or supply chain, Goodstart will take the following remediation action:

- > 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 develop 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.

9. Effectiveness

The Goodstart Group continues to assess the effectiveness of actions being taken to identify and address modern slavery risks by:

- > Regularly reviewing its supply chains against modern slavery risks and tracking changes in risk profiles for individual suppliers and sectors over time.
- > Applying due diligence of existing and new suppliers including review of suppliers' responses to Goodstart's Supplier Due Diligence Self-Assessment Questionnaire.
- > Engaging regularly with suppliers to ensure their understanding of the risk associated with modern slavery, and eradication of such risk.
- > Engaging regularly with Goodstart Group staff and management to measure their understanding of modern slavery risks in Goodstart's supply chain and Goodstart's procurement practices and internal mechanisms designed to prevent or mitigate such risks.
- > Regularly reviewing and reporting on identified KRI's (key risk indicators) for Modern Slavery under
- > Goodstart's Enterprise Risk Management Framework each quarter in Goodstart's Quarterly Risk Report to Goodstart's executive management and Board.

These actions have shown that the awareness and understanding of modern slavery continues to increase across both Goodstart Group staff and suppliers.

10. Subsidiary Consultation

All work about modern slavery also applies to our Subsidiaries under our group structure. All operational subsidiaries and their supply chains have been incorporated in the risk assessment process. Our group policies and procurement framework apply to all our subsidiaries which we own and control and are covered as part of our internal consultation process.

As part of that internal consultation process, our controlled entities have been provided with information and resources about modern slavery and the legislative requirements under the Act.

11. Priority Areas for the Next Reporting Period

In the next reporting period of 2024-2025, our areas of continuous improvement and focus in the modern slavery risk space include:

- > Further develop the Modern Slavery Questionnaire and follow on action plans
- > Utilise technology for analytics to include year on year analysis
- > Complete a modern slavery onsite assessment of a high-risk supplier
- > Update the procurement and contract management policies and training to provide further support to managing modern slavery risks with contract managers
- > Continue to provide all suppliers with Goodstart Modern Slavery eLearning training materials
- > Provide a refresh to all Goodstart and BFS employees by sharing the Modern Slavery eLearning training materials.

12. Attestation

This Statement has been approved by the Board of Directors (the principle governing body) for Goodstart Early Learning Limited ACN 139 967 794 ('Goodstart'), as the parent company and controlling body of the Goodstart Group as defined above, including GS. Admin Services No 1 Pty Ltd ACN 169 578 796, Goodstart Early Years Ltd ACN 133 530 364 and Big Fat Smile Group Limited ACN 002 796 232.

The Goodstart Board of Directors approved this statement for and on behalf of the Goodstart Group, pursuant to s.14(2)(d)(ii) of the Modern Slavery Act, by resolution dated date.



Dr Ros Baxter

Chief Executive Officer and Executive Director,
Goodstart Early Learning Limited
