

## MODERN SLAVERY STATEMENT

**1. Reporting entity:** Campion Education (Aust) Pty Ltd 33 074 318 602 (Campion)

**2. Reporting entity's Structure, Operations and Supply Chains:**

**Structure:** Campion Education is a Pty Ltd company. The Book House is a division of Campion and Insight Publications and Edsoft are subsidiary companies.

Campion Education is led by the board of directors and has approximately 150 permanent employees (full and part time); The Book House has 32 permanent employees; Insight Publications has 14 employees. Campion Education has a peak work period during the months of October to February. During this time Campion employs a large number of casual staff to assist in warehousing, distribution and retail activities.



**Operations:** Campion Education is a school resource supplier, providing textbooks, stationery, and digital learning to students studying at schools in Australia.

Operations include

- Service management with schools
- Purchase of eBooks, books and stationery
- Digital learning supply through Campion built platforms
- Warehouse logistics – packaging and delivery of online orders in Australia
- Retail – 14 stores around Australia.

All Campion's Operations are performed by staff located in Australia who are employed on employment contracts adhering to the requirements of the Australian National Employment Standards.

Throughout each year approximately 1700 casual staff will be employed on short term contracts, underpinned by Australian Modern Awards and compliant with the National Employment standards.



**Supply Chains :** Campion engages just over 900 suppliers who provide goods and services for resale, goods not for resale and for services business Operations.

- Goods and services for resale – Campion sources goods and services from local and international publishers, digital product suppliers, stationery providers and book distributors.

Publishers of resources for the Australian curricula typically generate content and design locally in Australia and then bulk print in South-East Asia and China. Stationery providers manufacture approximately 40% of their products in Australia, primarily sourcing the remainder from China. Additional source locations include North America, Europe, South America and South-East Asia.

Goods for resale are delivered to Campion sites throughout Australia, the largest being Dandenong South in Victoria and Malaga in Western Australia. These sites are staffed by permanent full time and part time employees and seasonal casual employees, all in compliance with ***Australian Industrial Relations Laws***.

Goods for sale are packed and distributed from Campion sites, primarily for the parents/carers and students who have ordered them, or direct to schools.

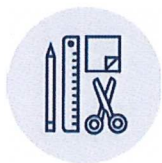
- Goods and services not for resale – Campion sources goods and services not for resale from approximately 350 suppliers.

Key services supplied include freight services, IT communications and hosting services, cleaning and security services.

Key products not for resale include IT equipment and stationery.

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

Campion's Operations represent a low risk given that all functional activities are performed within Australia in line with Australian regulatory requirements and with consistent oversight from the Campion senior leadership team.



Suppliers to Campion Education include local and international publishers and stationery product suppliers. Given items are sourced from a large number of locations worldwide, we are aware there are modern slavery risk in these supply lines.

Campion Education's focus throughout the past 12 months has been to better understand these risks based on key factors which include the source location of products and services, the operating industry and the level of spend Campion has placed with each supplier.

### **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**

Understanding that drivers for modern slavery risks include poverty, lack of education, unstable social and political conditions, economic imbalances, climate change and war are key issues that contribute to someone's vulnerability in becoming a victim of modern slavery, Campion had previously identified that source location of goods and services and the operating industry were 2 of the key factors in terms of the risks of modern slavery. The 3<sup>rd</sup> factor that was introduced for Campion's risk assessment of its impact in the current 2024 financial year reporting period included the level of spend on suppliers where there was the highest risk of modern slavery.

Campion Education contracted Fair Supply during this reporting season to improve Campion's understanding of the level of risks of Modern Slavery within its Operations and its supply chain. For this reporting period Fair Supply supported Campion's goal of ensuring integrity and objectivity in assessing our risk. Fair Supply's core business function is understanding and addressing risks within the Environment, Social and Governance space. Fair Supply's value to Campion includes its unique methodology to generate modern slavery risk ratings utilising consistently updated data and their



evolving platform of services to support business improvements. It is anticipated that Campion may contract Fair Supply in the future to support its Modern Slavery risk assessment needs.

Campion's 2023 focus assessed Campion's top 50 suppliers based on spend and covered 80% of Campion's total overall supplier spend. In 2024 Campion's approach to assessing and addressing the risks of modern slavery focused on the organisations where the level of spend and the risks derived from the industry and source of products created the greatest risk of modern slavery. Campion had 14 suppliers where the risks of modern slavery were the greatest. Factoring in the spend, the 14 suppliers represented 70% of Campion's overall risk of modern slavery. 3 of these represented 47% of Campion's overall modern slavery risk.

Campion has engaged with these suppliers and provided each with an updated ethical sourcing policy with the objective for each to declare their acceptance of the policy. For this reporting period 7 of the 14 suppliers have declared their acceptance of Campion's ethical sourcing policy with a target to have 100% acceptance by the end of the 2025 reporting cycle.

Locally Campion has further engaged with the 2 labour hire companies and 2 cleaning firms servicing all of Metro Victoria and Western Australia to better understand their operations.

Cleaning in Australia has a greater risk of modern slavery given the higher utilisation of sub-contracting, migrant workforce and competitive contracts. Campion reviewed the use of sub-contractors by the cleaning firms and ensured each provided assurances via Campion Ethical Sourcing Policy declaration.

Hire companies given their focus on temporary work attracts vulnerable workers, which include those with specific visa conditions. Campion mitigates this risk by engaging only those labour hire workers who have technical skills and licensing secured in Australia.



For the 2025 financial year Campion will expand its response to modern slavery risks, with planned actions to:

- Further hone Campion's understanding of its Modern Slavery Risks
- Target 100% acceptance of Campion's ethical sourcing policy for all suppliers with a risk rating greater than low
- Expand the rollout of Campion's Ethical Sourcing Policy to additional suppliers
- Enhance the supplier review to include performance to include ESG compliance
- Update the contractor onboarding process to include ESG risks.

#### **Relevant policies and agreements produced by Campion:**

- **Ethical Sourcing Policy and Ethical Sourcing Acceptance Agreement.** These documents set out the standards that we expect all suppliers to comply with when producing and supplying services and products to Campion. Relevant expectations include business integrity, labour rights, working conditions, child labour, wages and working hours, and ethical sourcing.

### **Campion Management**

Campion have partnered with social governance supporting affiliation partner Sedex and during the reporting period had a contract relationship with Fair Supply. Many of our major suppliers are already members of Sedex, and other major suppliers will be asked to join Sedex to demonstrate their organisational efforts to reduce the risk of Modern Slavery.

Campion has an ongoing agenda at the senior management level to review the progress of improvement in managing the risks of modern slavery.

### **Campion Staff Training:**

- Modern Slavery awareness and action – all relevant Supply Chain staff within the purchasing and inventory teams completed this online training module and learnt about all the types of modern slavery – human trafficking, slavery, servitude, forced labour, debt bondage, deceptive recruitment, the worst forms of child labour, and forced marriage, through examples and real life stories. They were able to develop a better understanding of how we all intersect with modern slavery in our daily lives and what we can do about it
- Campion Education has a risk management plan and reporting mechanisms to support reporting of breaches of company policy in place. This outlines how to identify, assess and respond to any risk within the business and outlines the responsibility of all team members. Risk management is communicated via an annual online re-induction completed by all employees.

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



**Continuous Improvement:** Campion is committed to improving the way it manages modern slavery risks and has utilised simple plan-do-check-act principles. A component of this is assessing (check) the results and adjusting where it is determined that the outcome will not be as effective as planned. Campion identified that plans to conduct the risk assessments internally would not have provided the objectivity and integrity required resulting in a change to external support.

**Reporting:** Campion will report the progress of the Social Governance improvement plan, results from the agreed number of additional supplier assessments and updates to the risks assessments quarterly to the Board and update this Modern Slavery statement annually (by 31 December each year).

**Investigation:** Any allegations of modern slavery or substandard working conditions will trigger an investigation / assessment. A Campion investigation and assessment will be led by Rob Morley, General Manager Operations, and respond with an appropriate course of action.

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

Campion targets alignment of systems and processes across all of its reporting entities. With recent acquisitions (Insight and The Book house) it is anticipated that this alignment will be completed in the 2025 financial year. Consultation on improvement initiatives occurs weekly via the senior management team meeting.

**7. Provide any other relevant information.**

**Appendix: Establishment of Ethical Sourcing Policy and Agreement**

Campion has produced an Ethical Sourcing Policy and Ethical Sourcing Acceptance Agreement as a starting point to formalise the alignment of expectations when targeting a reduction in the risk of modern slavery.

Work was completed in 2024 including the consultation and roll-out of these agreements to key suppliers.



These documents set out the standards that we expect all suppliers to comply with when producing and supplying services and products to Campion. Relevant expectations include business integrity, labour rights, working conditions, child labour, wages and working hours, and ethical sourcing.

**Business Integrity:**

- Honestly, fair dealing and the proper treatment of workers are required at all times
- Bribes, favours, gifts, benefits, facilitation payments, secret commission, or similar unlawful or improper payments, in case or kind, are strictly prohibited, whether given to obtain business or otherwise.

**Labour Rights:**

- Employment is freely chosen
- There is no forced, bonded or involuntary prison labour
- Workers are not required to lodge deposits or their identity papers with their employer and are free to leave their employer after reasonable notice.

**Working Conditions:**

- A safe and hygienic working environment is provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps are taken to prevent accidents and injury to health in the working environment
- Workers receive regular and recorded health and safety training and such training is repeated for new or reassigned workers
- Access to clean toilet facilities and to clean and drinkable water and, if appropriate, sanitary facilities for food storage is provided
- Accommodation, where provided, is clean, safe, and meets the basic needs of the workers
- Suppliers ensure that personal protective equipment is available, and workers trained in its use.

**Child Labour:**

- Suppliers must not use child labour and must only employ workers who meet the local minimum age requirement
- Suppliers must verify the age of their workers and maintain evidence of workers' proof of age
- Campion Education has a zero tolerance policy to child labour.



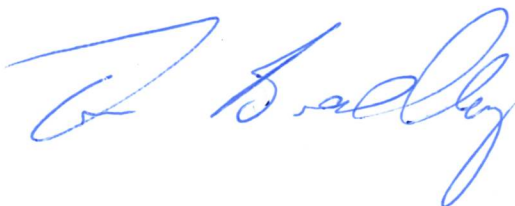
Wages: Campion's policy outlines Wage conditions including:

- Wages and benefits paid for a standard working week meet, at a minimum national legal standards or industry benchmark standards. Wages should always be enough to meet basic needs and to provide some discretionary income
- Suppliers must comply with all laws regulating local wages, overtime compensation, and legally mandated benefits
- All workers are provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about their particulars of their wages for the pay period concerned each time that they are paid
- Deductions from wages as a disciplinary measure or any deductions from wages not provided for by Law shall not occur without the expressed permission of the worker concerned.

Working Hours:

- Working hours comply with any Law and benchmark industry standards, whichever affords greater protection
- In any event, workers must not be required to work excessive working hours per week including overtime and have the option of at least one day off in seven. We expect that all record keeping will be strictly accurate, complete and transparent at all times.

This statement is supported by the board members of Campion: Marc Makrid, Brad Fenner, David Uhrig, Robert Uhrig, Tom Bradley.



**Tom Bradley, CEO and Managing Director**

***December 2024***