

# Modern Slavery Statement



Reporting period ending 30 June 2025

**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 our Chief Executive Officer

At Goodstart, we believe every child deserves a safe and fair start in life and that belief extends to how we operate as an organisation. We remain deeply committed to upholding human rights and ensuring our business and supply chains are free from modern slavery and human trafficking.

This responsibility is shared across our national team of 16,500 people and reflects the trust placed in us by the thousands of families who walk through our centre doors each day. It's a commitment grounded in our values and social purpose, and one we approach with integrity, vigilance, and care.

Over the past year, we've continued to strengthen our internal awareness and embed ethical practices across our operations. We take a proactive and collaborative approach to identifying risks, engaging our teams, and working closely with suppliers and partners to uphold high standards.

We recognise that eliminating modern slavery requires more than internal action - it requires open dialogue, transparency, and collective advocacy. That's why we continue to support policy reform where it is needed to protect children facing disadvantage and vulnerability.

This statement outlines the progress we've made, the risks we've assessed, and the steps we're taking to deepen our impact and uphold our commitment to ethical, responsible business practices.

**Dr Ros Baxter**

Chief Executive Officer and Executive Director, Goodstart Early Learning Ltd

# 1. About Goodstart

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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 15 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 16,500 people including 2,000 teachers and provide high quality early learning to more than 64,000 children from 53,000 families across 677 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

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Goodstart Early Learning Ltd ACN 139 967 794 ('Goodstart') is an Australian company, limited by guarantee and a registered charity with the Australian Charities and Not-for-Profits Commission. Goodstart's registered office is in Brisbane, Queensland.

Goodstart's wholly owned and wholly controlled subsidiaries ("Subsidiaries") during the reporting period 1 July 2024 to 30 June 2025 ("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 Ltd ACN 002 796 232, (together referred to as "the Goodstart Group" or "us" or "we" or "our"). Goodstart Early Learning Ltd 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 joint statement in accordance with the *Modern Slavery Act 2018* (Cth) 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 *Modern Slavery Act 2018* (Cth).

## 3. Our operations

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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 2025, Goodstart & Big Fat Smile:

- > Operated 677 Goodstart branded and 35 Big Fat Smile branded centres with centres in each State and Territory
- > Employed 16,500 staff
- > Cared for 64,000 children
- > Engaged with 53,000 families.

Further information about our operations can be found in the [FY25 Goodstart Annual Report](#).

## 4. Our supply chain

Goodstart manages approximately 103 suppliers, which during the reporting period represented a combined total spend of more than \$554 million. 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.

From Goodstart's procurement categories, the following have been identified as generally carrying potential risk of modern slavery within their 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. 2024-2025 assessment of supply chain risks

During the reporting period, Goodstart surveyed suppliers including those in high-risk categories and high-risk geographical areas as well as those with whom we spend more than \$250,000 annually (reduced from \$300,000 annual spend in the prior period). This resulted in the assessment of 10 additional suppliers (19% increase in suppliers assessed) and an additional \$9 million of total spend (3% increase against prior period).

Following the successful trial of EthixBase360 software to manage the distribution, collation and monitoring of our third-party suppliers through their online questionnaire, this year we have formally retained this approach for the next three years. The online questionnaire provided to suppliers was developed by Norton Rose Fulbright lawyers.

### 6.1 Results of questionnaire

The results of our annual modern slavery review have confirmed a low risk of modern slavery within our supply chain.

This year's results have built on the successful response rate of 2023-24. Out of 64 supplier self-assessment due diligence questionnaires distributed:

- > Approximately 98% of suppliers (63 out of 64) responded with a completed questionnaire - this was an increase in completion from 91% in the prior period;
- > For the 27 suppliers who traded goods and services with Goodstart of more than \$1 million, 97% (26 out of the 27) provided a response to the questionnaire, with the remaining one continuing to lodge their Modern Slavery Statements via the registry, and based on their submissions their Modern Slavery Risk is deemed low. This was an increase from 86% completion rate in the prior period.

Of the 63 questionnaires completed in 2024-25, four responses required further investigation (increase of two against 2023-24).

These suppliers were flagged for review due to their response change from 2023-24 (no new suppliers were identified). Upon investigation, there were no medium or high risks identified. The respective contract managers for the suppliers will continue to monitor associated risks as part of our ongoing contract management.

## 7. Ongoing due diligence and remediation

In 2024-25, Goodstart continued to strengthen supplier collaboration to meet Modern Slavery requirements. Our Modern Slavery working group, with member employees representing various departments, meet quarterly to assess risks and promote awareness among stakeholders and suppliers, emphasising Goodstart's commitment to reducing modern slavery in our supply chains.

### 7.1 Operational due diligence

Goodstart continues to adopt a risk-based approach to modern slavery focused on large suppliers and the primary site of manufacturing in their supply chain. Those suppliers identified within these categories are monitored closely.

During the reporting period Goodstart took further steps to assess and mitigate modern slavery risks within our operations.

In 2025-26 Goodstart will look to explore the visibility of Tier-2 and Tier-3 suppliers for high-risk categories (such as uniforms, ICT hardware and imported educational resources) and assess options for third-party audits with selected high-risk suppliers to validate questionnaire responses where required.

#### 7.1.1 Modern Slavery Risk Management questionnaire platform

During this reporting period we have continued utilising the EthixBase360 software platform and their modern slavery survey of suppliers with best practice designed surveys and reporting. Utilising this technology enabled more time efficient reviews and updating of information from suppliers, improved surveying of suppliers, automated communications, and collection of data that drives best practice scoring methodologies to identify high-level risk ratings and risk areas. The results then allow Goodstart to address specific areas of concern and seek to get clarity around activities being undertaken to address the risk identified. This software will be retained for use over the next 3 years.

#### 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 this reporting period, we again shared our online modern slavery eLearning module for all Goodstart employees, with scheduling aligned

with the International Day for the Abolition of Slavery on the 2nd of December of each year.

Our 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 module was also provided to all suppliers.

As part of our 2025-26 program, Goodstart will look to provide targeted refresher training for contract managers, senior leaders and centre directors to ensure modern slavery responsibilities are embedded at governance and operational levels.

### 7.1.3 Modern slavery working group

The previously established Modern Slavery Working Group continues to manage our response to the requirements of the Act. The composition of the working group broadly represents our business activities, with a focus on areas that are most relevant to modern slavery risk issues. The group meet regularly to monitor, plan and action as required.

### 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.

A Supplier Code of Conduct is currently in development to support how Goodstart engages and interacts with current and prospective suppliers to meet our Modern Slavery needs.

### 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 Third-Party Enterprise Risk and these risks and risk ratings are monitored on a quarterly basis as part of Goodstart's corporate risk management framework. This includes tracking key risk indicators (KRIs) and implementing corrective actions for any KRIs outside tolerance. The executive management team and Board are

regularly updated on third-party risks, 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:

- > Conducting an on-site audit assessment with a Tier 1 Educational Resource provider in China during the period.
- > 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 and/or 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 Goodstart added Big Fat Smile to the Goodstart Group. In the 2020-21 Annual Report and Financial Statements, Goodstart disclosed that Goodstart's procurement team had engaged with Big Fat Smile to gather information about their supply chain. That joint work continued through 2024-25 so that the Big Fat Smile's supply chain is comparable and integrated into Goodstart's 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 templates used for general and ICT procurement contain comprehensive modern slavery provisions. Additionally, Goodstart has established standard legal procurement requirements for new suppliers 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.

### 7.2.3 Expansion of scope

Goodstart intends to continue to develop our due diligence and investigation activity to

undertake a wider review of our supply chains to include further low risk suppliers in the next two years. Supplier completion of the Modern Slavery Questionnaire is now required annually of all Goodstart Group suppliers with an annual spend over \$250,000. The figure will be reduced to \$200,000 from June 2026 onward.

## 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 robust, confidential reporting mechanisms for both employees and third parties, enabling the anonymous reporting of suspected or actual human rights contraventions. All reported cases of modern slavery concerns are investigated within a strict timeframe and escalated to the Board if risks are deemed critical. Corrective actions and remediation steps are implemented immediately, and follow-up audits are scheduled to ensure the effectiveness of those actions.

Goodstart's Whistleblower Policy provides a mechanism for employees, suppliers, and contractors (including employees of suppliers and contractors), to anonymously report suspected wrongdoing without fear of retaliatory action. If a report is received it will be managed by Goodstart's designated Whistleblower Protection Officers and investigated at their direction by our dedicated internal investigators, or external investigators, where appropriate.

Where risks or issues are identified in our operations or supply chain, Goodstart will take the following steps to remediate the risk:

- > 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 our 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. .

These actions have shown that 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 *Modern Slavery Act 2018* (Cth).

## 11. Priority Areas for the Next Reporting Period

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In the next reporting period of 2025-2026, our areas of continuous improvement and focus in modern slavery risk include:

- > Continued use of technology to monitor the Modern Slavery Questionnaire and follow on action plans
- > Utilise technology for analytics to include year on year analysis
- > Assess options for third party modern slavery onsite assessment of high-risk suppliers
- > Monitor compliance with contract management and procurement policies including training to provide further support to managing modern slavery risks with existing contract managers
- > Continue to provide all suppliers with Goodstart Modern Slavery eLearning training materials
- > Provide targeted training to new contract managers to ensure compliance with Modern Slavery risk management processes
- > Provide a refresh to all Goodstart and BFS employees by sharing the Modern Slavery eLearning training materials.

## 12. Attestation

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This Statement has been approved by the Board of Directors (the principle governing body) for Goodstart Early Learning Ltd ACN 139 967 794 ('Goodstart'), as the parent company and controlling body of the Goodstart Group as defined above, comprising GS.

Admin Services No 1 Pty Ltd ACN 169 578 796, Goodstart Early Years Ltd ACN 133 530 364 and Big Fat Smile Group Ltd 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**  
Executive Director, Goodstart Early Learning Ltd

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