



**Camp
Australia**

Guiding children's growth

Modern Slavery Statement

Camp Australia Pty Ltd (ACN 060 703 120)

July 2020 - 30 June 2021

Contents

1. Introduction	3
2. Our Business and Supply Chains	4
2.1. Structure	4
2.2. Operations	4
2.3. Supply Chain	5
3. Risks of Modern Slavery	5
3.1. Operations	5
3.2. Supply Chain	5
3.3. Impacts of COVID-19 Pandemic	6
4. Actions Taken to Address Modern Slavery Risks	7
4.1. Workforce	7
4.2. Global Support Centre	7
4.3. Supply Chain	8
4.4. Audit & Risk Committee	8
5. Continuous Improvement	9
6. Effectiveness of Actions	9
7. Consultation	9

Introduction

This statement is made pursuant to the Australia Modern Slavery Act 2018 (Cth) (the Act) in respect of the period 01 July 2020 to 30 June 2021.

Spyder (BC) Holdco Pty Ltd (ACN 616 379 143) (a holding company) is a reporting entity and submits this joint modern slavery statement on behalf of the Camp Australia group.

Other entities within the group include:

Spyder (BC) Midco Pty Ltd (ACN 616 379 867)

Spyder (BC) Bidco Pty Ltd (ACN 616 297 904)

Camp Australia Pty Ltd (ACN 060 703 120)

Camp Australia Services Pty Ltd (ACN 158 075 837)

The Camp Australia Foundation Ltd (ACN 153 730 940)

Camp Australia Holdings Pty Ltd (ACN 160 199 306)

CAIP Pty Ltd (ACN 147 444 399)



Our Business and Supply Chains

2.1. Structure

Camp Australia is one of the largest providers of Outside Hours School Care (OSHC), and Holiday Care in Australia, with over 30 years' experience and a national portfolio of ~570 services at 30 June 2021.



50,000+
children



560
schools
nationally



2,500+
employees
nationwide



~170
corporate office
employees

2.2. Operations

Camp Australia is headquartered in Melbourne, Australia. As at 30 June 2021, Camp Australia directly employed approximately 170 employees at its head office, and approximately 2,500 employees nationwide.

The core services provided are Before and After School Care and Holiday Care for non-school aged, and school aged children.

Camp Australia's vision is 'To support all families in achieving their dreams'. We see our role as being of societal value through providing support to working families, parents and carers, those that are studying or who need extra support in caring for their children.

For schools, Camp Australia provides societal value through (i) positioning the OSHC service as an added value of the school, (ii) ongoing investments we make towards school facilities to improve the OSHC experience, (iii) additional resources, (iv) staffing and the highest level of training in OSHC care. The additional training of our staff in Autism Training, Additional Needs, Resilience Training and Positive Psychology, Mindfulness as well as working with disadvantaged schools, children and families provides a platform that allows all children to be included and is what sets Camp Australia apart.

Camp Australia's approach to partnering with stakeholders is based on our principles – namely "Relationships Matter" and "Community Focussed", where we actively provide to parents, schools and the wider school communities which we serve, direct feedback portals to assess, inform and improve how we partner with them.

With respect to our employees, we encourage open and transparent communication and feedback– and emphasise ethical behaviour and conduct within our employment practices and experience in school communities.

We aim to continuously improve, and many of our internal indicators across parent, principal and employee satisfaction indices demonstrate improvement across this timeframe.



2.3. Supply Chain

Camp Australia's supply chain consists of goods and services that support the provision of care services to children in attendance – including food and educational resources.

Our sector is generally assessed as being at low risk of having modern slavery situations present within it.

Camp Australia delivers care services solely in Australia, a country which has been assessed as having a lower prevalence of modern slavery, together with an active government response to dealing with the issues.

Camp Australia's greatest expenditure is remuneration of head office and service staff, and thereafter our supply chain is predominantly related to expenditure that provides the technology infrastructure, facilities and other support required to enable the delivery of our children's care services.

Risks of Modern Slavery

Camp Australia has reviewed the scope of our operations and supply chains and have identified the following sectors that may have high modern slavery risks.

3.1. Operations

- Camp Australia employs a large number of Educators in services, some of whom may be less aware of their rights and/or vulnerable to exploitation. These Educators are governed by the Children's Services Award 2010, as well as the Education and Care Services National Law Act. Camp Australia's compliance with the Award and Act ensures employees are protected from any risk of Modern Slavery.
- Camp Australia utilises one of the largest managed operations providers in the Philippines to provide support through a Global Support Centre, with approximately 123 individual employees.

Our immediate suppliers are predominantly based in Australia and the Philippines. The risk of modern slavery in Australia is generally deemed as low, however, some of the Australian suppliers may source goods or services from overseas, and this could include jurisdictions with a higher risk of modern slavery. Whilst the Philippines has a higher prevalence of modern slavery, the risk with this supplier is low due to their Australian ownership and compliance with the Anti-Modern Slavery and Trafficking in Persons Policy and framework.

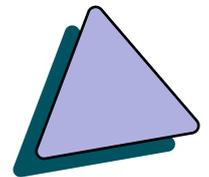
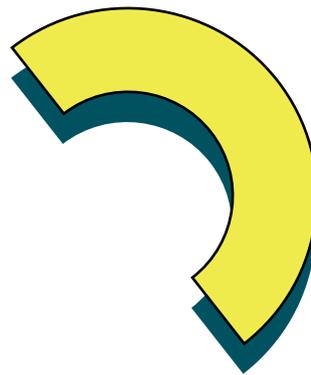
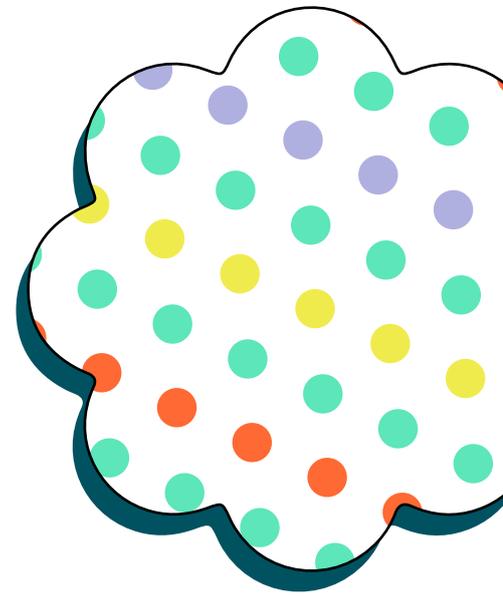


3.2. Supply Chain

- Camp Australia's largest suppliers (outside of employment) are also bound by the Act due to the size of their businesses.
- Camp Australia may procure some goods from suppliers that are either located in, or source goods from, countries or regions that are estimated to have a higher prevalence for modern slavery. As a result, these goods have an increased modern slavery risk. For instance, uniforms for use in services, and the manufacture of laptops, computers and mobile phones, particularly in China are at high risk of modern slavery.

3.3. Impacts of COVID-19 Pandemic

- The risk of modern slavery in relation to employees has marginally increased in the last financial year due to the increased dependency on agency staff to fill shifts in services. Whilst agency staff account for a very small proportion of total labour costs (approx. 0.25%), the business recognises there is a lack of control over agency staff term's and conditions and therefore these workers may be more vulnerable to modern slavery risks.
- The pandemic has presented a myriad of challenges to our suppliers, from business activity reduction and supply chain issues which result in businesses attempting to cut costs where possible, to suppliers operating in industries that have experienced extreme business growth and therefore have not followed thorough resourcing due diligence. Each of these challenges may result in an increased risk of modern slavery in the supply chain due to a lack of understanding surrounding business that goods or services are being provided by.



Actions Taken to Address Modern Slavery Risks

4.1. Workforce

Camp Australia considered whether modern slavery practices exist within its own workforce, noting that:

- Camp Australia headquarters and services are all located in Australia, which is estimated to have a low prevalence of modern slavery.
- Camp Australia has a number of policies to encourage expected behaviours within its operations, including a Whistleblower Policy.
- Camp Australia provides all its employees access to an Employment Assistance Program (EAP). The EAP provides confidential psychological counselling, and introductory legal advice (non-work related), at no cost.
- Camp Australia has an in-house People & Culture team, who can be accessed in multiple ways by employees including via a P&C Hotline and a thorough recruitment and onboarding process, which requires that each new employee reads and confirms acknowledgement and understanding of Camp Australia's policies.
- Camp Australia employees working within services are regulated by the Children's Services Award 2010.
- Camp Australia utilises one of the largest managed operations providers in the Philippines to provide support through a Global Support Centre, with approximately 123 individual employees.

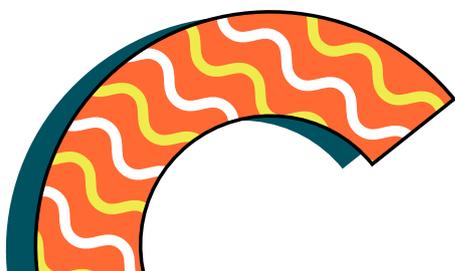
After considering this risk, Camp Australia has concluded that it is a low risk that modern slavery exists within its own workforce.

4.2. Global Support Centre

Camp Australia considered whether modern slavery practices exist within the Global Support Centre and note that:

- The provider is Australian owned and one of the largest and most experienced managed operations providers in the Philippines, with 4,000 staff and has been supporting Australian, American and European companies since 2006. They have supported Camp Australia since July 2015.
- The provider has its own Anti-Modern Slavery and Trafficking in Persons Policy and framework, which is complimentary to the aims and objectives of the Act.
- The most recent services agreement with Camp Australia includes specific references and warrants regarding the Act.

After considering this risk, Camp Australia concluded that it is a low risk that modern slavery exists within the Global Support Centre workforce.



4.3. Supply Chain

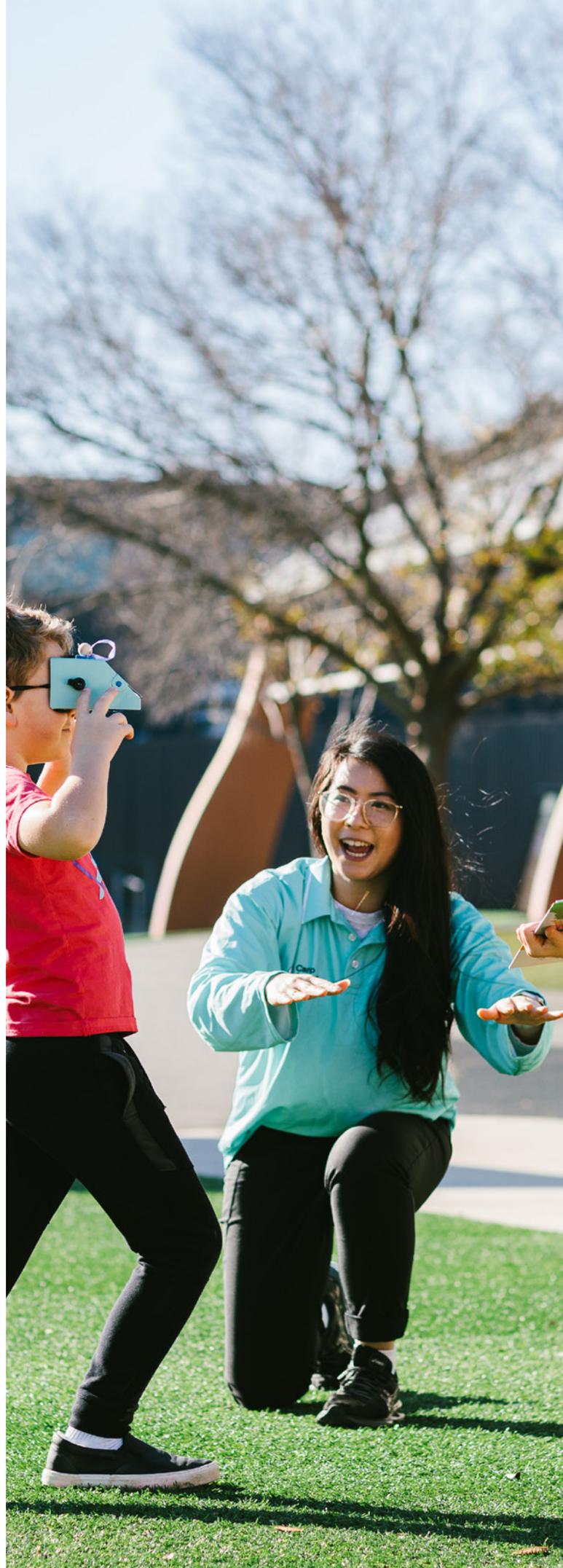
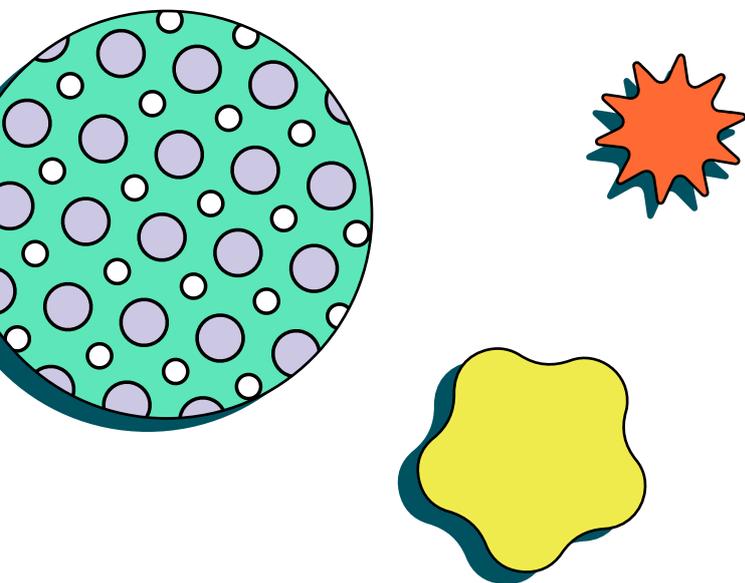
Camp Australia's largest supplier has been conducting supplier modern slavery risk assessments since 2017 and concludes that there is a low risk of modern slavery existing within the supply chain.

Camp Australia has little visibility of the supply chain for the remaining suppliers, however the small number and nature of goods and services provided by these suppliers, indicates there is only a minor risk of modern slavery existing within the supply chain.

4.4. Audit & Risk Committee

The Audit & Risk Committee of Camp Australia is charged with assisting the Board in fulfilling its responsibilities for corporate governance and oversight of the risk management framework, controls and systems. The Committee's purpose is to assess and respond to risks such as modern slavery.

Camp Australia's Audit & Risk Committee meets on a quarterly basis to review the major risks of the business and develop action plans to address and mitigate these risks. In determining the major risks of the business, Camp Australia has considered the Act and has determined the current risk to be low. This risk will continue to be monitored and discussed in the quarterly meetings when required, and if it is identified that the risk level has increased, the Committee will develop an action plan to mitigate any exposure or risk.



Continuous Improvement

In the next reporting period:

- Educate staff on Camp Australia's Modern Slavery Policy and updates to existing policies
- Develop a framework for use by Camp Australia's resourcing team when engaging in procurement opportunities and service renewal agreements, to ensure risks of modern slavery are considered at the outset of any supplier engagement
- Develop a modern slavery questionnaire for completion by Camp Australia high risk suppliers which highlights the risks associated with modern slavery, and Camp Australia's expectations in relation to this. The results of the questionnaire will be used to identify which suppliers Camp Australia can engage with to improve their practices and policies and mitigate any risk surrounding modern slavery.

After considering this risk, Camp Australia has concluded that it is a low risk that modern slavery exists within its own workforce.

Effectiveness of Actions

In considering the above, whilst Camp Australia has not discovered any specific modern slavery issues within its operations or supply chain, the actions taken have:

- Provided management with greater insight of Camp Australia's major modern slavery risks in the operations and supply chain; and
- Educated key personnel on modern slavery.

Consultation

Key members of the Executive Leadership team of Camp Australia have been consulted in the preparation of this Statement, with Directors of the business involved in the review and finalisation process.

This modern slavery statement was approved by the principal governing body of Camp Australia Pty Ltd as defined in the Modern Slavery Act 2018 (Cth) ("the Act") on 23 December 2021.

This modern slavery statement is signed by a responsible member of Camp Australia Pty Ltd as defined in the Act.



Igor Merkin
CFO
Camp Australia Pty Ltd

