

Modern Slavery Statement

This statement is submitted in accordance with the *Modern Slavery Act 2018 (Cth)*. It describes the steps taken by G8 Education Limited (ASX:GEM) (**G8 Education**) to prevent, detect and respond to risks of modern slavery in our operations and supply chain.

This joint statement covers the activities of G8 Education together with its controlled entities as outlined in its annual report for the year ending 31 December 2020.

G8 Education is committed to living out its values of passion, innovation, dedication, compassion and integrity, and opposes all forms of exploitation and all practices which violate the human rights and dignity of individuals. In particular, G8 Education is alert to and opposes all forms of child labour, including:

- (a) all forms of slavery or practices similar to slavery, such as the sale and trafficking of children, debt bondage and serfdom and forced or compulsory labour, including forced or compulsory recruitment of children for use in armed conflict;
- (b) the use, procuring or offering of a child for prostitution, for the production of pornography or for pornographic performances;
- (c) the use, procuring or offering of a child for illicit activities, in particular for the production and trafficking of drugs; and
- (d) work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety or morals of children.

Such practices are antithetical to our purpose and mission as an organisation and we are committed to ensuring such practices, and all other forms of modern slavery, do not exist within our operations or supply chain.

This statement was approved by the Board of G8 Education on 30 April 2021.



Gary Carroll
CEO and Managing Director
30 April 2021

1. About G8 Education

G8 Education is the leading for-profit provider of quality care and early education services across Australia through a range of well-respected and recognised brands. Our purpose is to create the foundations for learning for life.

We operate 472 centres providing early education and child-care services throughout Australia. We have over 46,000 children attending our services in any given week and over 9,500 team members educating and caring for those children.

2. About our operations and supply chain

As a leading provider of early education and childcare services listed on the Australian Securities Exchange (ASX), we operate in an environment of robust regulatory oversight under the Education and

Care Services National Law and the National Quality Standard and we also comply with the ASX Corporate Governance Council's Corporate Governance Principles and Recommendations (4th Edition). For these reasons we assess low risks of modern slavery arising directly from our operations. However, we assess a higher potential risk of modern slavery within our supply chain from goods purchased from overseas or which have components sourced from overseas.

Consistent with the United Nations Guiding Principles on Business and Human Rights, we carry out due diligence to identify, prevent, mitigate and account for adverse human rights impacts arising from goods and services providers in our supply chain.

2.1 Services

2.1.1 Modern Slavery Risks relating to Services.

G8 Education contracts with commercial cleaners, gardeners, and repair and maintenance workers to support its operations. We are alert to the risks of modern slavery in these workforces, particularly the cleaning workforce, which consists of predominantly low-skilled and migrant populations with limited understanding of their legal rights and limited English language skills. Such risks are further elevated as a result of the opaque operating structures of providers and sub-contracting arrangements which can result in the human rights of workers being difficult to monitor as a result of low levels of transparency.

2.2 Goods

2.2.1 Modern Slavery Risks relating to Goods.

Our supply chain for goods principally relates to the purchase of the following items for use within our early education and child-care centres:

1. **Food** – including packaged food and fresh food ingredients used within the centres to make meals for children within our care;
2. **Centre Resources** – including nappies, wipes, gloves, toilet tissues, hand towels, as well as office products (paper, toner, computer equipment, and stationery); and
3. **Teaching Resources** – including arts and craft supplies and modern teaching aids.

Food

Having regard to the nature of the work involved in the production, processing, packaging and transport of food and fresh produce, which includes the prevalent use labour hire contractors who are backpackers or seasonal workers on farms and reported practices including passport retention and poor working conditions we assess that whilst Australia is generally a “low risk” country for modern slavery, the nature of the supply chain for food gives risk to specialised risks, depending on where food is sourced from.

Centre Resources & Teaching Resources

As a consumer of centre inputs such as nappies, clothes, toys and other equipment, G8 Education is alert to the risks of modern slavery that arise from the complex multinational supply chains for those goods and engages with suppliers that demonstrate a robust understanding of their own supply chain and conduct and report on their own human rights due diligence.

G8 Education is particularly alert to the modern slavery risks within the supply chains for electronic good. For example, G8 Education is aware that cobalt is an essential component of rechargeable lithium-ion batteries, and that more than half of the world's cobalt is mined by the Democratic Republic of Congo, where according to research undertaken by UNICEF, approximately 40,000 miners are children.

Consistent with our commitment to reducing the risks of modern slavery within its supply chain, G8 Education engages with suppliers of electronic goods from manufacturers that have committed to adoption of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

3 Actions being taken to address risks of Modern Slavery.

G8 Education undertakes the following actions to address risks of Modern Slavery within its supply chains for goods and services:

3.1.1 Price

G8 Education is aware of research undertaken by Oxfam and others that demonstrates a direct correlation between downward pressure on prices for services and goods and increased risk of human rights violations and modern slavery within the supply chains for those services and goods.

In recognition of this effect, G8 Education does not select providers of services or goods on the basis of price alone, but selects suppliers based on various criteria including trade references, a review of policies and practices related to modern slavery risks, and a review of minimum entitlements within the relevant sector to ensure that the prices paid by G8 Education for services and increases in those prices agreed over time are at a level that ensures the providers are not subject to undue pressure to engage in exploitative practices and are able to pay a living wage to all workers and meet or exceed minimum legal entitlements for workers providing services to G8 Education.

G8 Education further adopts preferential treatment for the engagement of providers of services on terms that permit it to verify compliance with minimum legal entitlements to workers providing services to G8 Education.

3.1.2 Conducting due diligence on our suppliers and supply chains.

To address risks of Modern Slavery in its own supply chain for goods, G8 Education engages with suppliers that conduct and report on modern slavery risk within their supply chains, and preferentially engages with suppliers that have implemented robust auditing of modern slavery risks.

G8 Education procures food from suppliers that subject producers to independent audit and certification of fair employment practices to a SA8000 International Standard Certification or similar and preferentially engages with suppliers that are supporters of the Fair Farms initiative.

G8 Education will not engage with any supplier that has identified child-labour within their supply chain, and engages preferentially with suppliers that implement auditing mechanisms that allow them to verify the age of all workers within their supply chains to ensure no child labour is used.

3.1.3 Developing a corporate policy to address modern slavery in our operations and supply chains.

G8 Education has a [Code of Conduct](#) and [Whistleblower Policy](#) published on our website and provides a way for employees, volunteers, residents, clients, vendors, contractors and others to report their concerns confidentially, freely and without fear of repercussion.

Of the 13 complaints received by the Whistleblower Channel zero have related to issues of modern slavery.

Further, G8 Education are currently developing a Procurement Policy to address all aspects of governance and transparency in its procurement operations. The policy will reiterate G8 Education's commitment towards ethical sourcing and ensuring that we do not knowingly allow human rights abuses from our suppliers of goods of services.

Following this, G8 will develop a Supplier Code of Conduct upon which Suppliers will need to agree before G8 will transact any business.

3.1.4 Reviewing our supplier agreements to ensure modern slavery risks are addressed.

In its standard services contract and PO terms and conditions, G8 diligently pursues terms that require a prohibition on sub-contracting other than as agreed by G8. Additionally, G8 requires all suppliers to undergo a Working with Children check, so as to ensure that all supplier personnel hold where relevant, a clearance to work with children. G8 also require each supplier to provide evidence of compliance with our work health and safety (WH&S) and environment policy.

3.1.5 Reviewing our own operations.

In relation to our operations, we are committed to ensuring that our employees are paid in line with market rates and we check that those we recruit are of legal working age and are choosing to work of their own free will. We do not tolerate discrimination or harassment and endeavour to sustain the health, safety and wellbeing of our employees, volunteers and contractors.

G8 Education notes that in late 2020 it announced that it had self-identified non-compliance with some requirements of the Children's Services Award and the Educational Services (Teachers) Award for a number of the Group's team members in Australia. G8 Education voluntarily self-reported the matter to the Fair Work Ombudsman and is committed to working to fully remediate any underpayment of wages, including interest, to all applicable former and current team members. Back payments are expected to have been substantially completed by the end of July 2021.

4 G8 Education's commitment against modern slavery

Consistent with our commitment to ensure risks of modern slavery are eliminated in our operations and supply chain, G8 Education is committed to:

- Conducting due diligence on all contractors and suppliers and promoting an expectation of them to make their own commitments to address risks of modern slavery in their own operations and supply chains;
- Auditing the progress of all contractors and suppliers in addressing the risks of modern slavery in their own operations and supply chains; and
- Providing training for employees, suppliers, and contractors on the risks of modern slavery and how to address those risks in a manner consistent with G8 Education's values.