

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 25 permanent employees; Insight Publications has 15 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 – 15 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 approximately 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 Champion 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 Champion sites, primarily for the parents/carers and students who have ordered them, or direct to schools.

- Goods and services not for resale – Champion 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 Champion senior leadership team.



Suppliers to Champion 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 how individual supplier organisations address these risks.

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, Champion identified that source location of goods and services and the operating industry were the key factors in terms of the risks of modern slavery.

Utilising external expertise, data and tools was essential to ensure the integrity and the objectivity of the risk assessments.

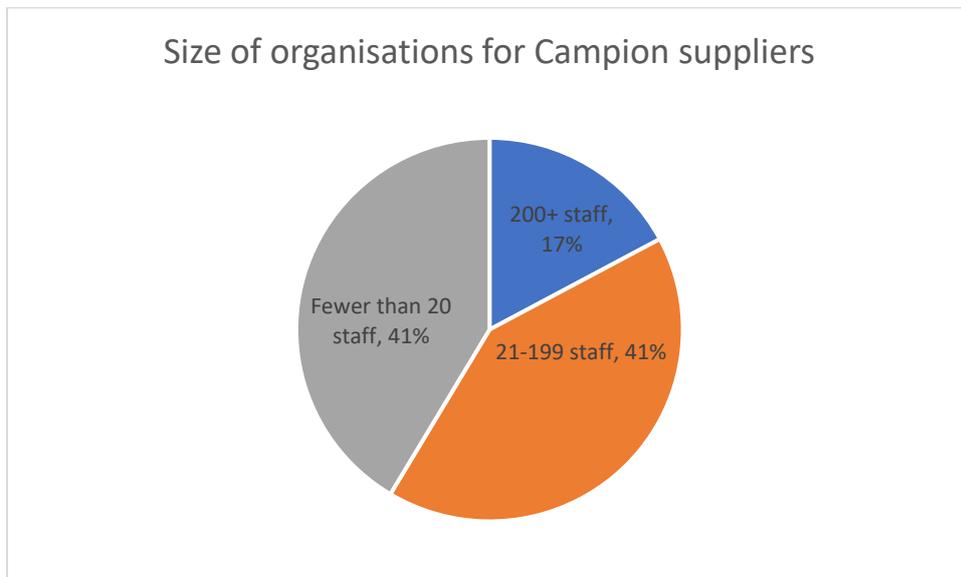
After reviewing a number of external support providers, Champion Education partnered with Fair Supply to better understand the risks of Modern Slavery within its Operations and its supply chain. The choice of Fair Supply was due their core business function being understanding and addressing the risks within the ESG space, their methodology of generating modern slavery risk ratings by

utilising consistently updated data and their evolving platform of services to support business improvements.

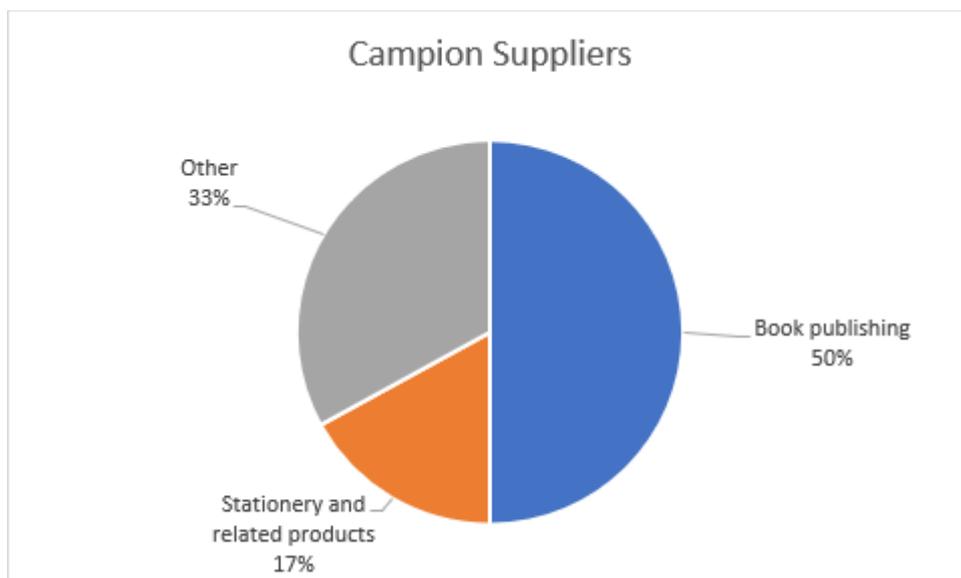
Campion engaged with its top 50 suppliers, who provide more than 85% of all Campion’s supplied products and services, to better understand how they are addressing the risks of modern slavery within their organisations.

Results from our Key Supplier Questionnaire

Over 60% of suppliers questioned provided a response to our survey. Suppliers have the following attributes:



- **17% employ over 200 staff (large organisation), 41% less than 20 staff (small organisation) and 41% employing 21-199 staff (medium organisation)**



- **28% of respondents source products from locations with the highest risks of modern slavery**

- **50% of respondents provide modern slavery training to staff**
- **88% of respondents undertake activities to detect and manage the risks of modern slavery within their organisations**
- **75% of respondents manage the risks of modern slavery through policies and procedures applied to both their businesses and supply chains.**

External analysis of the same 50 suppliers by Fair Supply reviewed the risks deriving from both the source location of goods and services provided to Campion and the industry in which the suppliers are operation. The large majority were identified as having low risk of modern slavery with a very small number identified with moderate risks. There were no suppliers assessed as having a high risk.

Having achieved the key objective of developing a process for objectively assessing modern slavery risks, Campion has the ability to improve on the existing controls and remediation steps.



For the 2024 financial year Campion will expand its response to modern slavery risks, with planned actions to:

- Develop an assurance process to ensure that supplier controls effectively mitigate the risks of modern slavery, with priority placed on suppliers identified at moderate risk
- Extend the assessments to include additional suppliers to Campion Education
- Review the current Ethical sourcing policy and contractor onboarding to improve efficacy.

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. This work is scheduled for completion in FY 2024 includes consultation and roll-out of these agreements to key suppliers
- Campion has produced a **Contractor Management Policy**. This document includes an assessment of the applicable work, health and safety system as well as an acceptance of Campion's Ethical Sourcing policy.

Campion Management

Campion have partnered with social governance supporting affiliation partner Sedex and 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
- Champion 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: Champion 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. Champion 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: Champion 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 Champion 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

Champion 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 2024 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

Champion 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 to be completed in FY 2024 includes 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 The Champion Group: Marc Makrid, Brad Fenner, David Uhrig, Robert Uhrig, James Cathro.



James Cathro, Managing Director

December 2023