



Panther Topco Pty Ltd - 2021 Modern Slavery Statement

Panther Topco Pty Ltd (ACN: 626 390 136)
July 2020 – 30 June 2021

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Our commitment

At Junior Adventures Group, people are our business.

Our values strengthen our commitment to ensuring that fair and ethical workplace standards are maintained throughout our supply chain and within our own operations.

This is particularly important when it comes to the risk of modern slavery, as it comprises the worst forms of human rights abuse. Taking action to prevent modern slavery in both our supply chain and our operations is therefore central to our human rights responsibilities as an organisation.

Junior Adventures Group seeks to prevent modern slavery and human trafficking in our organisation and in our supply chain. This document highlights our practices and associated policies and provides insight into the supply chain and business processes of our organisation.

The reporting entity

This Statement is made by Panther Topco Pty Ltd (ACN 626 390 136).

References to 'JAG', 'our' and 'we' in this Statement are references to Panther Topco Pty Ltd. This Statement also describes practices that are common to JAG's other majority-owned and/or controlled subsidiaries, which are collectively referred to as the Junior Adventures Group ('the **Group**'). References to the Group include Panther Topco Pty Ltd.

This Modern Slavery Statement ('the **Statement**') is made pursuant to the Australian *Modern Slavery Act 2018* (Cth) ('the **Act**'), which covers our financial year ended 30 June 2021 ('the **Reporting Period**'). It details our approach to managing modern slavery risk in our operations and supply chain and summarises our progress to-date.

The Statement has been approved by the Board of Panther Topco Pty Ltd.

1.0 Our Corporate Structure

Panther Topco Pty Ltd is the ultimate holding company of several operating entities belonging to what is known as Junior Adventures Group ('the **Group**'). JAG is an Australian company and headquartered in Melbourne, Australia. JAG has subsidiaries in Australia (**JAG Australia**), the UK and New Zealand.

The Panther Topco Pty Ltd Board is the principal governance and oversight body of the Group, including all wholly owned and majority owned operating entities in Australia and overseas. The Board is accountable for ensuring that the Group appropriately manages all risks, including those related to modern slavery.

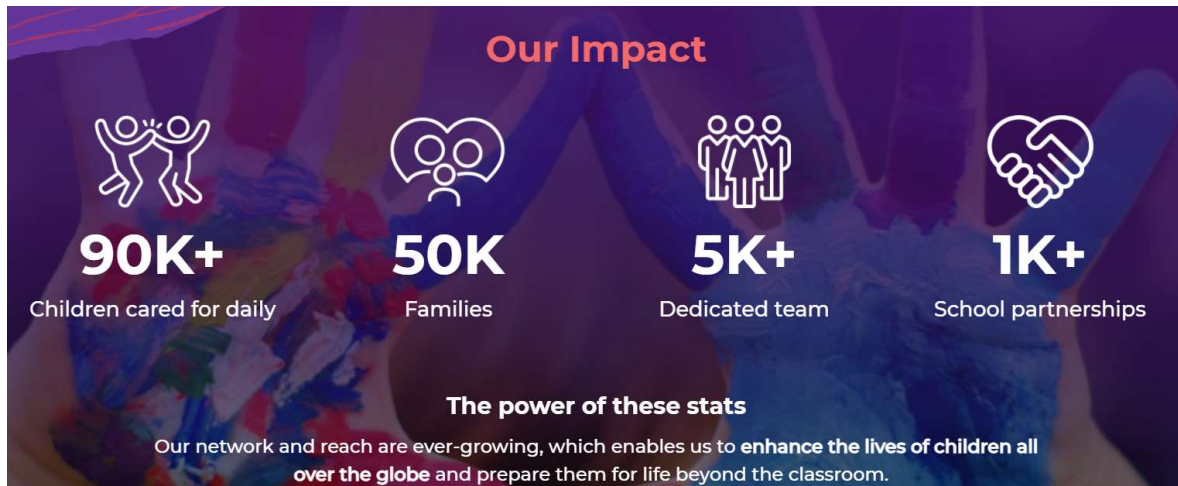
A list of JAG's subsidiaries is set out in Appendix 1.



2.0 Our Operations and Supply Chain

2.1 Operations

Through company-owned, managed and franchise operations, JAG provides quality, bespoke Before, After School and Holiday Programs to 1,000+ schools worldwide. In order to deliver these services, the Group employs approximately 5,000 people across Australia, the UK and New Zealand.



Our brands OSHClub, Helping Hands Network, Primary OSHCare, sKids, Sherpa Kids, Energy Kidz and Fit for Sport are leading the sector in quality and safety, fostering an environment in which the children within our care continue to learn and have fun. We believe in the importance of learning through play, and that we can influence the development of every child in our care.



Our key operations

Direct employment of workers

The majority of JAGs' staff are employed directly by the relevant JAG Australia entity, with their employment terms and conditions set out in employment contracts governed by Australian employment laws and relevant industrial instruments.



	We also utilise labour hire services to employ casual workers to provide childcare services (see below).
Provision and delivery of Services	<p>The Group provides before, after school and vacation care programs in partnerships with schools to nearly 1,000+ schools worldwide such as government, independent and catholic primary schools.</p> <p>As this is a highly regulated industry, we conduct a high level of vetting on our workers who deliver these services.</p>
Marketing and Sales	JAG uses inhouse marketing.

Investment and lending

JAG does not externally engage in financial lending activities. Intra-company lending forms part of JAG's operations and any associated modern slavery risks related to those activities is addressed above as part of its operations.

2.2 Supply Chain

JAG Australia utilised approximately 480 suppliers during the reporting period. Our major categories of suppliers are as follows:

- **Food** – JAGs' main food supplier is one of the leading vendors based in Australia, and we have a stable long-term relationship with the supplier. They provide foods to all of our services across Australia.
- **Labour Hire** – JAG utilises labour hire agency services to employ casual workers to our services. The agency is responsible for paying the worker and JAG oversees the day-to-day work. We have a stable long-term relationship with this Agency.
- **Professional services** – JAG uses cleaning companies to conduct cleaning services at our services. We have stable relationships with these agencies.
- **IT** – We purchase IT equipment's and obtain IT related services through Australian based Vendors. We do not acquire these services or products from offshore.
- **Property** – JAG uses school premises to conduct OSHC services and we have license to use these spaces.



3.0 Risks of Modern Slavery in our Operations and Supply Chain

Junior Adventures Group is committed to safe workplaces, to limiting risk of modern slavery within its operations and supply chain and to the eradications of modern slavery. We encourage and support every effort made to prevent modern slavery, including in its supply chain.

Some of the most common forms of slavery are:



3.1 Operations and People

We have considered our recruitment, remuneration and employment practices and the nature of our workforce to assess the potential risks of modern slavery occurring in our operations.

In the relevant reporting period, the risk of modern slavery within the organisations' learning and teaching services is considered very low given the regions we work in, the human resources and payroll controls we have in place and the transparency we have over our operations. Areas of risk include the use of casual labour for provision of childcare services utilising a labour hire agency and for provision of cleaning services.

JAG Australia meets its compliance obligations under the Fair Work Act 2009 (Cth). Senior management seeks to mitigate the risk of engaging in practices that cause or contribute to modern slavery through our people and culture policies and practices.

3.2 Supply Chain Risks

JAG Australia's supply chain is in Australia which decreases the inherent Modern Slavery risks. We do not acquire any products or services directly from overseas. Any foreign raw materials or manufactured products consumed or used are acquired through 3rd parties domiciled in Australia.

We recognize some of our suppliers have their own complex and diverse supply chains for manufactured goods and raw materials that can expand beyond Australian borders and this expanded supply chain is a potential higher-risk area for modern slavery.

The following indicators were used to identify and assess potential supplier risk:

- sector and industry risk;
- geographic risk;
- product and services risk (including outsourcing arrangements); and



- specific signs that may indicate a person is in a situation of modern slavery (for example, vulnerable employees).

Our suppliers were categorised as low, medium or high risk based on the above assessment.

During the relevant reporting period, we have identified the below categories for potential risks of modern slavery practices in its supply chains:

- Cleaning services;
- Human resource & employment services;
- Technology [IT hardware]; and
- Office supplies.

3.3 Covid 19 Impact

Due to the nature of our services, JAG continued to operate during the pandemic throughout Australia, in order to provide care to children of essential workers and disadvantaged children.

Although, Covid 19 has not impacted JAG heavily compared to other businesses, lockdown measures enforced by the government did result in decline in number of children enrolled with our services. This resulted in some supplier programs and orders needing to be cancelled (due to the restrictions imposed by the government) or adjusted during this period.

JAG understands that any adjustments to ongoing services (programs/orders) may increase Modern Slavery risks for workers in the supply chain therefore, we have worked closely with our suppliers who were directly affected to agree to service adjustments that are satisfactory to all parties.

As the pandemic expands across the globe, we continue to work with our suppliers to agree on plans for the ongoing management of activities, including appropriate changes to working operations to ensure our supply chains are operating in a safe environment and we endeavour to keep our communications open and transparent with our suppliers in order to mitigate any potential Modern Slavery risks.

4.0 Actions taken to address Modern Slavery Risks

JAG Australia has policies and procedures in place as part of its commitment to providing a fair and safe work environment for everyone. Some of these are:

- Whistleblower policy
- Employee code of conduct
- Equality and Diversity policy
- Grievance Procedure

The Whistleblower policy outlines our commitment to encourage people to speak up if they become aware of potential misconduct, explain what protections a discloser will receive and promote a



workplace environment in which everyone feels safe and supported. The grievance procedure facilitates the reporting of concerns by employees.

4.1 People

JAG Australia has internal functions but also engages Human Resources business partners to facilitate engagement with our employees. Key actions that were undertaken during the reporting period to address the risk of modern slavery include:

- Review of standard conditions of employment including the Employee code of conduct.
- Review of compliance with our recruitment and screening policy which includes multiple reference checks, right to work, working with children's check and criminal history checks.
- Adhering to the award requirements for remuneration of our people; and
- Communicating our Whistleblower policy and Grievance procedure to our employees.

4.2 Supply Chain

Although JAG suppliers are in Australia, we recognise certain goods and services (such as IT hardware, furniture, office supplies) that our suppliers procure will be from countries outside Australian borders where there may be a higher risk of Modern Slavery.

Therefore, JAG conducts supplier due diligence for our major suppliers by requesting ethical sourcing policies, Modern Slavery statements (if any), accredited certifications (BSCI, SEDEX, ISO) and other documentations which shows the necessary steps our suppliers take to identify, educate and mitigate potential Modern Slavery risks from their supply chains.

Any current or former employee or director with information about potential misconduct is encouraged to speak up under our Whistleblower Policy.

5.0 Assessing the effectiveness of actions taken to address modern slavery risks

As part of our commitment to managing the risk of modern slavery, JAG assessed the effectiveness of actions being taken to modern slavery risks. In 2021, we:

- Engaged with our major suppliers on their policies and processes related to Modern Slavery.
- We have sent/communicated our Whistleblower policy and Grievance Procedures to all employees.

We intend on building on this and implementing additional processes through to FY22 to assess our effectiveness in identifying and managing modern slavery risks.



6.0 Consultation

Panther Topco Pty Ltd consulted with each of the entities it owns or controls in preparing this statement. Key members of the executive team and the procurement team were consulted for comment prior to the statement being put to the Board of Panther Topco Pty Ltd for review and approval.

Sign off

This Statement was approved by the Panther Topco Pty Ltd Board of Directors on 16/12/2021.



Craig Napier

Group CEO



Marcus Darville

Chair of the Board

Junior Adventures Group



Appendix:

JAG Australia:

- OSHClub Pty Ltd (ACN135 003 520): Operates Outside of School Hours Care (OSHC) services in Australia
- Primary OSHCare Pty Ltd (ACN 108 614 080): Operates OSHC services in Australia
- Sherpa Kids International Pty Ltd (ACN 160 539 551): International franchisor of the SKIDS and Sherpa Kids brands
- Helping Hands Network Pty Ltd (ACN 134 154 162): Operates OSHC services in Australia
- Reliance HR Solutions Pty Ltd (ACN 154 205 160): Provides labour services in Australia as well as acting as the corporate services entity in Australia
- Young Minds Connect Pty Ltd (ACN 165 742 558): Provides incursion/excursion services in Australia
- Sofus Holdings Pty Ltd (ACN 168 832 933): Licences IP in Australia

JAG UK:

- Sherpa Kids England Ltd (CN: 11705893): Operates and Franchises OSHC services in the United Kingdom
- Energy Kidz Ltd (CN: 07054337): Operates OSHC services in the United Kingdom
- Fit for Sport Ltd (CN: 03648410): Operates OSHC services in the United Kingdom

JAG NZ:

- Skids Programme Management Ltd (NZIC: 1804662): Operates OSHC services in New Zealand
- Safe Kids in Daily Supervision Ltd (NZIC: 2442969): Master Franchisor of OSHC services in New Zealand

