



Affinity Education
Group

Modern Slavery Statement

What is Modern Slavery?

The *Modern Slavery Act 2018* (Cth) (**Act**) came into effect on 1 January 2019. The Act requires organisations based or operating in Australia with an annual consolidated revenue of \$100 million or more to report annually on the actions they are taking to avoid or eliminate modern slavery in their operations and supply chains.

The Australian Government describes modern slavery as circumstances where offenders use coercion, threats or deception to exploit victims and undermine their freedom (**Modern Slavery**). Modern Slavery can occur in every industry and presents itself in many ways including human trafficking, enslavement and forced labour.

Modern Slavery distorts global markets, promotes unethical cost cutting techniques and poses significant legal and reputational risks to entities. Affinity Education Group Pty Limited (**Affinity**) is dedicated to ensuring we are not contributing to Modern Slavery as much as possible and working with our suppliers to ensure that our supply chain is ethically and responsibly sourced.

What does this mean to us?

Being aware of Modern Slavery means utilising the best quality and ethically sourced resources and services to ensure that we are not contributing to an issue of global harm. This Modern Slavery Statement (**Statement**) outlines the steps Affinity has taken to identify, manage and mitigate specific risks of Modern Slavery within our operations and supply chain.

Affinity strongly supports governmental mechanisms aimed at addressing violations of human rights. This Statement outlines Affinity's operations and supply chains, Modern Slavery risks relevant to the conduct of Affinity's business (**Risks**), actions taken by Affinity, the effectiveness of those actions and the approach taken during the reporting period.

These values demonstrate Affinity's commitment to eliminating Modern Slavery practices and describe how activities have and will be undertaken to mitigate Risks. Affinity is committed to supporting the Act.

This Statement supports Affinity's steadfast commitment to consistent and continuous improvement, and a willingness to recognise the Risks in our business and undertake necessary actions to minimise and mitigate those Risks.

Operations

Affinity is a proprietary company that operates nationally providing early childhood care and education (**ECEC**) services. We currently own and operate some 250 childcare centres across Australia. We provide ECEC services to approximately 23,000 children and employ approximately 5,900 staff.

Affinity promotes the following operational activities in support of its business objectives:

- delivering quality care and education to children within our centres;
- directly sourcing our employees;
- providing educational pathways for development to our educators; and
- developing childcare centres that prioritise the safety and wellbeing of children in our care and are compliant with all regulatory requirements.

Supply Chain

Affinity's supply chains include various services which assist with the delivery of ECEC services by our centres, as well as suppliers who work with us to ensure that the centres are safe and compliant. Affinity seeks to engage with suppliers who prioritise products sourced ethically and from Australia.

These include:

- food, merchandise and uniform suppliers;
- professional service providers;
- contractors, including building works, cleaners, IT providers, marketing services and HR services;
- resources suppliers, including play equipment and educational materials; and
- educational program suppliers including excursion and incursion providers, language lessons, music classes, and maths and English programs.

All of Affinity's key supply arrangements are governed by negotiated written agreements that are reviewed by Affinity's legal counsel to ensure appropriate modern slavery provisions are included in Affinity's contracts.

Modern Slavery Statement

In this Statement, Affinity will:

- report on its actions to assess and address Risks associated with its supply chains; and
- report on its actions to assess and address Risks associated with its operations, including its employment practices and providing training for staff.

Risk of Modern Slavery Statements

Affinity recognises that there may be risks attributable to its current supply chain arising from the operations of its contractors or their sub-contractors. This may include risks that contractors are not using ethically sourced material or supplies, providing inadequate training or conducting insufficient enquiries into labour being utilised to ensure that Modern Slavery does not take place within their operational structures and risks relating to expedited time frames for completing various projects.

Affinity continues to adopt a risk-based approach to modern slavery focused on material or 'high risk' suppliers with a key indicator being the location of manufacturing within their supply chain.

Supply Chain Risks

Affinity recognises that there may be Risks inherent in its supply chain arising from the operations of its suppliers, contractors or their sub-contractors. This may include risks that suppliers and contractors are not using ethically sourced materials or supplies, providing inadequate staff training or conducting insufficient enquiries into the labour being utilised to ensure that Modern Slavery does not take place within their operational structures.

Affinity continues to adopt a risk-based approach to mitigating Risks, focused on material or 'high risk' contractors and suppliers, with a key indicator being the location of manufacturing within the provider's supply chain.

Affinity seeks to address these Risks by undertaking due diligence on its contractors and suppliers in order to continuously implement practices to support the principles of the Act.

Affinity recognises that Risks are mitigated by the implementation of supplier onboarding procedures. In line with Affinity's risk-based approach, Affinity carries out the following procedures when onboarding material or 'high risk' contractors and suppliers:

- request information from direct suppliers and contractors about their sub-suppliers and sub-contractors;
- execute supplier agreements that include express anti-modern slavery obligations;
- require the completion of a Modern Slavery supplier questionnaire which identifies supply chain risks with the supplier or contractor; and
- using publicly available traceability processes to improve information about the source of products.

If a Risk is identified, Affinity's our Safety Committee assesses the Risk, engages with the relevant contractor or supplier, and develops a corrective action plan to remedy the Risk. If an appropriate corrective action plan cannot be implemented, the engagement will be terminated.

Affinity reviews at least annually its internal policies and procedures, including its Whistleblower Policy, to ensure its employees, suppliers and contractors are able to notify Affinity of any issues that may be occurring or contributing to Modern Slavery.

Operational Risks

Affinity strives to ensure that it is managing Risks within its day-to-day operations. In order to assess the effectiveness of strategies to manage and mitigate Risks, Affinity:

- includes Modern Slavery discussions in its Safety Committee meeting agendas. These meetings are attended by senior management and consider emerging or existing Risks within the organisation and how to best address these Risks. This includes tracking and providing updates on any projects undertaken by the broader business to manage and mitigate Risks;
- completes annual reviews of all policies and procedures with relevant internal departments to ensure policies and procedures accurately reflect the business's objectives. This includes reviewing the risk assessment procedures within Affinity's operations;
- reports any identified Risks to its executive management team and Board;
- undertakes a rigorous review when employing new staff, including conducting police checks and ensuring compliance with regulatory requirements related to working with children;
- promotes training and education among staff to ensure they are aware of their obligations to uphold applicable laws, regulations, codes and standards; and
- undertakes regular reviews of key suppliers assessed as having an elevated risk of human rights violations, in particular where offshore manufacturing is involved.

Affinity further seeks to mitigate Risks within its operations through the use of its Third Party Provider - Standard Terms and Conditions, as published on Affinity's website, which contains express undertakings from suppliers and contractors related to the prevention of Modern Slavery.

Brands and Trading Names

This Statement covers the activities of Affinity together with the entities it controls¹.

Each entity owned or controlled by Affinity is governed by the same management team, with shared governance, policies and procedures to address the requirements under the Act.

This Statement applies to all childcare centres owned and operated by Affinity under the following brands:



This statement was approved by the Board of Affinity on 27 May 2026.

Glen Hurley

A handwritten signature in black ink, appearing to be 'Glen Hurley'.

Director and Board Member

27 May 2026

¹ This Modern Slavery Statement covers:

1. BHL Childcare Pty Ltd
2. All Kids Childcare Services Pty Ltd
3. NTL Investments Pty Ltd
4. Bambini Early Childhood Development Brisbane Pty Ltd
5. Bambini Early Childhood Development Southport Pty Ltd
6. Bambini Early Childhood Development Peregian Pty Ltd
7. Bambini Early Childhood Development Gold Coast 2 Pty Ltd
8. Bambini Early Childhood Development Meridian Pty Ltd