Modern Slavery Statement 2024



Acknowledgement of Country ---







C&K acknowledges and pays its respects to the Traditional Custodians of the lands on which we live and work and honour their continuing connection to land, sea, and community. C&K also pays respect to all Elders past, present and emerging.

C&K recognises that the footprints of our offices and centres are located across Queensland and our learning communities have been shaped, and will continue to be shaped, by the influences of Aboriginal and Torres Strait Islander cultures, wisdoms, and knowledge.

Honouring First Nations Peoples' histories, perspectives and continuing connections to land, sea and sky in all early childhood programs deepens everyone's learning; to learn from, and with, the longest living culture in the world, and to walk together for a better future for all.

C&K's early childhood centres recognise that an innovative early childhood curriculum is richest when it connects past, present, and future. The C&K Curriculum Approach, Listening and Learning Together, draws on our 117-year history of commitment to early childhood education, reflects current research and policy, and enables scope for embracing the future.



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This Modern Slavery Statement is approved by The Creche and Kindergarten Association Limited Board of Directors on 30 June 2025.

Dr Megan Gibson

Chair - Board of Directors

Disclosure Note

This statement has been made on behalf of The Creche and Kindergarten Association Limited. ACN - 150737849 ABN - 59150737849

1. Introduction

1.1 About

C&K has proudly nurtured the learning and development of Queensland children for 117 years. As a not-for-profit organisation, we have always put children at the centre of everything we do, which allows us to honour every child's curiosity, individuality and potential.

C&K remains a trusted brand by families and communities to offer an engaging and enriching educational environment across 182 branch kindergartens and childcare centres in Queensland. C&K acts as the central governing body for 143 affiliated centres. While these affiliated centres may carry C&K's brand, they are separate legal entities, and this Modern Slavery Statement does not cover them.

This document is C&K's Modern Slavery Statement for the 2024 reporting year issued under the Modern Slavery Act 2018 (Cth) (Act). It outlines the steps we have taken to identify, manage, and mitigate the specific risks of modern slavery in our operations and supply chain.

C&K is committed to respecting human rights, including the right to be free from slavery, forced labour, domestic servitude, and, most specifically - the exploitation of children.

We work with integrity and strive for excellence - every day. Our purpose is to nurture and inspire children to succeed in an ever-changing world. Modern slavery is entirely unacceptable to us, and we are committed to continuous improvement so that our processes remain effective in preventing modern slavery.

1.2 Chief Executive Officer's message

C&K opposes all forms of modern slavery, such as forced labour, child labour, debt bondage, servitude, human trafficking, and deceptive recruiting for labour or services. These actions violate human rights, are against the law and are entirely at odds with C&K's core values.

We are committed to proactively understanding the risk of modern slavery, raising awareness within our centres, and identifying, assessing, and mitigating modern slavery risks in our supply chain.

Education is the hallmark of C&K, and we believe that knowledge sharing can drive change. In 2024, we continued focusing on raising staff awareness of modern slavery. We have strengthened our procurement procedures, prioritising larger procurement activities and goods originating outside of Australia.

We assess that C&K has an overall low risk profile, and during 2024, we did not detect any instances of modern slavery in our operations or supply chain.

2. Our structure, operations, and supply chain

2.1 Our organisational structure

C&K is a public company limited by guarantee and a registered charity. We are headquartered in Brisbane, Queensland, and our workforce and operations are located in Australia.

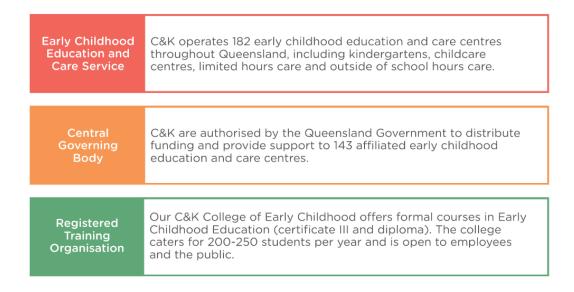
Effective Corporate Governance is critical to our ongoing success. Our Governance Structure for the 2024 reporting year is below and highlights the interaction between the Board, external advisors, and the Executive Management Group.

Delegation Independent Legal or Board Accountability **Board Committees** sight through Delegation Constitution Board Charter Early Years and Innovation Committee Committee Charters Whistleblower Whistleblower Delegation of Authority Risk Management Workplace, Health and Safety Strategic Plan Gifts and Hospitality reporting Nominations Committee Conflict of Interest People and Culture Fraud Control Committee Executive Management Group (EMG) Audit, Risk and Finance Committee Recommendations and Feedback Assurance Resource Allocation, Participation, Action External Audit Internal Audit

2024 C&K Governance Structure

2.2 Our operations

C&K was formed in 1907 to support disadvantaged families whose children had nowhere safe to play and learn. Throughout C&K's 117-year history, our organisation has met the needs of the families and communities we support. Our business operates in three key areas:



2.3 Our supply chain

In 2024, C&K worked with more than 1,450 direct suppliers of goods and services, which are critical to our business. Our supply chains range from small family businesses to national and international organisations. C&K is committed to respecting the fundamental human rights of all people, and we work with our key suppliers to communicate our expectations of them. C&K expects the highest ethical practices and professional standards from its suppliers through their commitment to:

- Compliance with laws and regulations.
- Socially responsible and sustainable practices.
- Valuing and respecting all people by respecting diverse backgrounds, experiences, and perspectives.
- Robust corporate governance.
- Displaying integrity with a proactive focus on risk awareness and management.
- Environmental stewardship.





3. Identifying risks in modern slavery practices

C&K acknowledges that modern slavery risks may be present in the products and services we purchase and that primarily engaging Australian suppliers does not necessarily offset this risk.

3.1 Operations risks

There were no material changes to our operations during 2024 that would impact our modern slavery risk profile. We have not identified any issues or concerns as part of our control mechanisms, and we continue to assess our modern slavery profile as low risk.

The following elements contribute to C&K's low-risk profile:

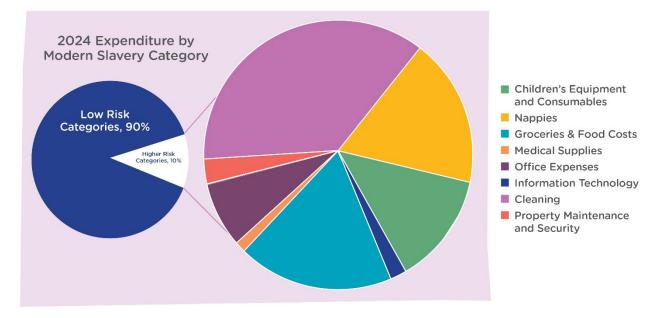
- Many of our casual centre and permanent staff are employed directly and paid under enterprise agreements.
- C&K pays higher than award rates.

- C&K has higher staff retention than the sector average.
- C&K operations are subject to regular internal and external audits as part of a highly regulated sector.
- C&K centres are all located in Australia.

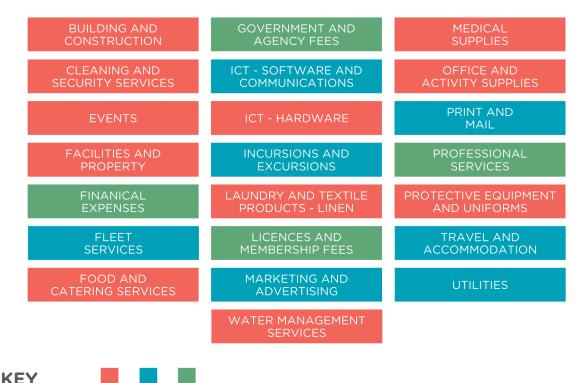
3.2 Supply chain risks

Like many businesses, C&K's main modern slavery risk exposure resides within its supply chain. C&K procures a broad range of goods and services from various suppliers each year. However, based on the Department of Home Affairs Modern Slavery Guidance Notes and the Global Slavery Index, around 90% of C&K's annual expenditure falls into low-risk categories, such as employee, depreciation, finance, and occupancy costs.

Of the remaining 10%, our spend in cleaning, grocery and food costs, repairs and maintenance and IT hardware are sectors that pose a higher modern slavery risk given the type of employment structures often utilised in the sector and or the reliance on manufacturing in countries with poor governance, relatively weak rule of law and inadequate worker protections.



C&K Supplier Risk Assessment



Risk Assessment High Medium Low C&K assessment based on Department of Home Affairs Modern Slavery Guidance Notes and Global Slavery Index.

C&K reduces its risk in our supply chain by prioritising the use of major suppliers who demonstrate their own due diligence, such as through their own modern slavery statements, and provide information on their supply chains. However, the wide geographical distribution of C&K's centres across Queensland means that this is not always achievable, and we often rely on smaller local suppliers who do not necessarily have the same knowledge of modern slavery risks or systems and processes to manage them.

4. Actions taken in 2024 to assess and address the risk of modern slavery

C&K's modern slavery risk mitigation actions are focused on two main areas: training and awareness and procurement.

C&K is committed to ensuring that all C&K employees understand that modern slavery is a real and present issue that can affect the people we encounter or that we may contribute to through our purchasing decisions.

At C&K, all head office employees and our centre Directors are assigned the modern slavery training module as part of their mandatory compliance training. This course is required to be completed within 90 days of commencing employment. By undertaking this module, C&K employees develop a foundational understanding of modern slavery, its prevalence in Australia and worldwide, and how C&K potentially contributes to the issue through its business activities.

At C&K, we want our staff to understand how their purchasing decisions could be contributing to modern slavery and to be able to recognise possible warning signs that someone may be a victim of modern slavery and what actions they can take if they are concerned for their welfare.

During 2024, C&K also focused on strengthening our modern slavery governance arrangements when engaging with our suppliers.

For larger suppliers, this included seeking information on their approach to managing modern slavery risk as part of our market tendering assessment process and including modern slavery clauses in contracts valued at more than \$100,000. As part of this

process, Tenderers must outline, as part of their submission, information about their modern slavery risks, if they are a reporting entity under the Modern Slavery Act 2018 and a copy of their most recent modern slavery statement for review. Before contract award, the preferred Tenderer must complete C&K's modern slavery questionnaire, which provides more detailed information on the supplier's operations, policies, procedures, and supply chain.

• For smaller suppliers, we continued encouraging them to demonstrate their acceptance and commitment to the principles outlined in C&K's Supplier Code of Conduct by signing and returning it to C&K.

5. Assessing the effectiveness of our actions

We acknowledge that reviewing and assessing our actions to identify and tackle modern slavery risks within our operations and supply chain is an ongoing and evolving process. We are fully committed to enhancing and expanding this process.

C&K's progress against its 2024 Modern Slavery KPIs is outlined below.

C&K's assessment of progress on our actions

Approved Measures	Approved Target for 2024	Outcomes as at 31 December 2024
Completion of introductory modern slavery training module within 3 months of commencing employment. Percentage of central staff.	100%	98%
Completion of introductory modern slavery training module within 3 months of commencing employment. Percentage of centre directors.	100%	96%
Number of modern slavery incidents identified within our operations or supply chain.	Zero	Zero
Percentage of active suppliers with an ongoing relationship with C&K provided with C&K's Supplier Code of Conduct.	100%	100%
Percentage of suppliers with an ongoing relationship with C&K providing a signed statement relating to modern slavery.	75%	50%
Agreements executed with a contract value of at least \$100,000 with specific modern slavery clauses.	100%	84%

A strong focus on upskilling our employees proved highly successful, with 98% of our central office staff and 96% of our childcare and kindergarten Directors completing our modern slavery training module within 3 months of commencing employment.

C&K continued our efforts to engage with smaller suppliers in our supply chain by distributing our Supplier Code of Conduct to new vendors where there is an expectation of an ongoing supplier relationship, and 50% of these suppliers signed and returned the code of conduct to C&K. This was less than our target of 75%, and C&K will continue to investigate options to more effectively engage with smaller suppliers on modern slavery and human rights issues. A key focus for 2025 will include reviewing our procurement policy and procedures, including the process for selecting and setting up new vendors.

Of the 34 new agreements executed by C&K valued at more than \$100,000, five did not have specific modern slavery clauses as part of the agreement. However, each vendor or its parent organisation showed their commitment to addressing the modern slavery process through their own modern slavery statement.

6. Process of consultation with entities owned or controlled by us

We do not own or control any other entities; therefore, this criterion is not applicable.

7. Other relevant information

We commit to recognised human rights frameworks, standards, and goals, including:

- International Bill of Human Rights (United Nations Human Rights, Office of the High Commissioner)
- International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work (adopted 1998 and amended 2022)
- United Nations Guiding Principles on Business and Human Rights. Implementing the United Nations' Protect, Respect and Remedy Framework (United Nations Human Rights, Office of the High Commissioner)
- United Nations Sustainable Development Goals including Target 8.7 to eradicate modern slavery.
- Human Rights Act 2019 (Qld)