

Modern Slavery Statement

January 2023 – December 2023



**Only About
Children**
More Than Childcare

Modern Slavery Statement for reporting period to December 2023

January 2023 – December 2023

About us

With over a decade of experience in early childhood education, Only About Children operates around 80 early learning and kindergarten/preschool campuses throughout Sydney, Melbourne and Brisbane. This breadth gives us the opportunity to provide high-quality early years education and care to over 8,000 families and employ over 2,000 people, whose skills, experience and passion help us to deliver on our mission to empower every child to reach their full potential.

It's our unique approach to childcare that gives children the platform they need to thrive. It's an approach that goes beyond education to encompass the health, development and total wellbeing of every child in our care.

In July 2022 Only About Children was acquired by Bright Horizons, a leading global provider of high-quality early education and childcare, Back-Up Care, and workplace education services.

Following the acquisition and based on the clear alignment of our core business values, we adopted the Bright Horizons HEART Principles, being the foundation of our culture and how we interact with one another when we are at our best. These values – Honesty, Excellence, Accountability, Respect and Teamwork – guide all of us in the work we do each day.

1. Identify the reporting entities

1.1 This is a joint statement submitted in accordance with the *Modern Slavery Act 2018* (Cth) for the reporting period 1 January 2023 to 31 December 2023 on behalf of a group of entities ('OAC Group') that together comprise and operate the business 'Only About Children'.

1.2 As at the end of the 2023 calendar year, BlueTang Holdings Pty Ltd (ACN 659 125 416) (a holding company) is a reporting entity, the Australian parent company and controlling entity in relation to the other reporting entities included in this statement, and submits this joint modern slavery statement on behalf of OAC Group.

1.3 Other reporting entities within OAC Group and included within this statement are:

1.3.1 Nemo (BC) Holdco Pty Ltd (ACN 614 209 880) (a holding company);

1.3.2 Nemo (BC) Midco Pty Ltd (ACN 614 211 219) (a holding company);

1.3.3 Nemo (BC) Bidco Pty Ltd (ACN 614 212 716) (a holding company);

1.3.4 OAC Group Pty Ltd (ACN 169 895 229); and

1.3.5 Only About Children Pty Ltd (ACN 107 666 624).

1.4 This statement covers the activities of OAC Group as a corporate consolidated group, controlled by BlueTang Holdings Pty Ltd.

2. Structure, Operations and Supply chain

Our Corporate Structure

- 2.1 OAC Group is a group of privately owned Australian companies and trusts with the highest controlling and reporting entity being BlueTang Holdings Pty Ltd.
- 2.2 On 1 July 2022, OAC Group was acquired by the Bright Horizons business and the ultimate owner is now Bright Horizons Family Solutions Inc, a US listed entity.
- 2.3 In addition to the reporting entities listed, OAC Group includes several non-reporting entities, being subsidiaries or related bodies corporate to the reporting entities within OAC Group.
- 2.4 Together, these OAC Group entities operate our early years education and childcare business, Only About Children. Despite the multiple legal entities that sit within our structure, the business operates as a single operational brand, with uniform governance structures and policies in place across all entities.
- 2.5 In light of this structure, the operations and supply chains of the business are considered to be the same for all reporting entities (and non-reporting entities) within OAC Group. This statement considers the risks of modern slavery and responses to those risks for the business as a whole, as these are relevant to and similar for all entities within our corporate group.

Our Operations

- 2.6 OAC Group operates in Australia, a country which has been assessed by the Global Slavery Index as having a lower prevalence of and a strong government response to modern slavery¹. The business also operates in an environment with a robust regulatory framework under the *Education and Care Services National Law* and the National Quality Standard. Our operations have grown to around 80 campuses across Sydney, Melbourne and Brisbane, providing early years education and care services to over 8,000 families and employing more than 2,000 people.

Our Supply Chain

- 2.7 We note that the International Labour Organisation identified the following areas as high-risk sectors for modern slavery in supply chains²:
 - 2.7.1 Services (covering a wide range of economic activities including trade, transport, hospitality and non-market social and other services, but excluding domestic work (32%);
 - 2.7.2 Manufacturing (18.7%);
 - 2.7.3 Construction (16.3%);
 - 2.7.4 Agriculture (12.3%);
 - 2.7.5 Domestic work (8.2%);
 - 2.7.6 Mining and quarrying (1.4%); and
 - 2.7.7 Other (including begging and illicit activities) (11.1%).
- 2.8 Furthermore, in Australia, forced labour predominantly occurs in high-risk industries such as:
 - 2.8.1 Agriculture;

¹ Global Slavery Index 2023, see Figure 1: Estimated prevalence of modern slavery by country and Figure 2: Government responses to modern slavery, [Global Findings | Global Slavery Index](#)

² Global Estimates of Modern Slavery: Forced Labour and Forced Marriage (2022) ILO, Page 31, Figure 8 <https://www.walkfree.org/reports/global-estimates-of-modern-slavery-2022/>

- 2.8.2 Construction;
- 2.8.3 Domestic Work;
- 2.8.4 Meat processing;
- 2.8.5 Cleaning;
- 2.8.6 Hospitality; and
- 2.8.7 Food Services.³

2.9 We recognise the exposure to risk of modern slavery through imported products, with the top five most valuable products imported by Australia that are at risk of being produced under conditions of modern slavery being electronics, garments, solar panels, textiles and fish.⁴

2.10 OAC Group's supply chain consists of goods and services that support the provision of our early learning, educational and care services. Our greatest expenditure is in remuneration, and thereafter our supply chain is predominantly related to expenditure that provides the infrastructure, facilities and other support required to enable the delivery of our early learning and educational services.

2.11 To consider our risk profile relating to modern slavery we have identified the scope of our operations and the type of suppliers we engage and have identified the main, highest dependency areas as follows:

- 2.11.1 Landlords/leasing costs;
- 2.11.2 Agency staffing;
- 2.11.3 Insurance and professional services;
- 2.11.4 IT equipment and services;
- 2.11.5 Food supplies;
- 2.11.6 Office supplies, equipment and consumables;
- 2.11.7 Cleaning services;
- 2.11.8 Building services, repairs and maintenance; and
- 2.11.9 Utilities.

2.12 This analysis alerts us to the higher risks of modern slavery occurring within the operations of our tier one suppliers, predominantly in the cleaning and building services, as well as, potentially, agency staffing contracts. Further, we recognise the risk of modern slavery occurring within further tiers of our supply chain, particularly where purchasing imported products such as solar panels, IT equipment, garments and some food supplies.

³ Global Slavery Index 2023, Country Study, Modern Slavery in Australia, <https://www.walkfree.org/global-slavery-index/country-studies/australia/>

⁴ Ibid, at Table 1: Imports of products at risk of modern slavery to Australia.

<p>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.</p>	<p>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.</p>
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Our Operations

Employees

<p>3.1 The early education and childcare sector is generally assessed as being at low risk of modern slavery being present within it. Our employees require a minimum skill level to undertake their roles (in both the operational and support teams) and are likely to be aware of their rights and not vulnerable to exploitation.</p>	<p>4.1 Policies, Employee Assistance Program and Whistleblower Hotline</p> <p>4.1.1 The business annually reviews its policies and procedures to grow awareness and strengthen the remediation processes in place to address adverse human rights impacts. All policies explicitly identify the risks of modern slavery practices and include mechanisms for reporting any instance or suspected instance of modern slavery.</p> <p>4.1.1.1 The annual review includes:</p> <ul style="list-style-type: none"> • Our Modern Slavery Policy, adopted in the FY21 reporting period and published on our website for visibility to suppliers, our families and any third parties, and communicated to all employees to ensure their awareness and compliance. • Internal policies: <ul style="list-style-type: none"> ○ Code of Ethics and Conduct; ○ Grievance and Dispute Resolution Policy; and ○ Whistle Blower Policy; which employees must acknowledge acceptance of and adherence to on starting employment. • External policies: <ul style="list-style-type: none"> ○ Dealing with Complaints Policy; which is made available to the families we provide a service to. <p>4.1.2 All employees have access to an Employee Assistance Program (EAP), providing confidential counselling and assistance at no cost. Our employees are advised of the existence of the EAP when commencing employment (EAP information and contacts are shared during the onboarding process and on their first day at induction) and then on a</p>
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regular basis. The monthly reports we received from our EAP provider confirm that this service is actively used by our employees.

- 4.1.3 During this reporting period the business implemented an anonymous whistleblower hotline that employees can access via the web and toll-free telephone line. This improves trust with reporters and provides an easy-to-use interface for employees. It also provides the business with an effective case management system.

4.2 Education and Training

- 4.2.1 At the forefront of our messaging to employees when considering modern slavery is that we have a zero-tolerance approach. As referenced above, we have a suite of policies, including a bespoke Modern Slavery Policy, which employees are all required to review and acknowledge understanding and acceptance of when commencing employment.
- 4.2.2 We also have a dedicated Modern Slavery Online Module with a compulsory assessment to be passed for successful completion. The module is contained within an online learning system, OAC Academy, that generates reminders to learners who have not yet or failed to complete their assigned learnings. This was previously a mandatory course for all permanent employees to complete as part of their induction. However, during the reporting period it was considered that for employees engaged in campuses (primarily responsible for first-hand delivery of education and care to children) who were not responsible for procurement of supplies, there were competing priorities for their time spent completing online learning (eLearning). Accordingly, in December 2023 we commenced a review of our entire compliance eLearning program. In the next reporting period we will deliver a new compliance module on our Code of Ethics and Conduct that includes modern slavery, which will be mandatory for all employees, including casual employees, to complete during their induction. The dedicated Modern Slavery Online Module will remain mandatory for Campus Directors (responsible for procurement of

	<p>campus supplies and staff rostering) and all roles within the support office.</p> <p>4.2.3 As at 31 December 2023, there were 1,243 active employees who had been enrolled on the learning module and 93% had completed the module. This is a marked improvement from the prior year’s 65% completion rate, though is driven by the fact that the audience for the Modern Slavery Online Module was latterly adjusted, targeted to those employees considered more likely to have an impact on the risk of modern slavery in the business operations.</p> <p>We are setting a target completion rate of 95% by 31 December 2024 and will aim to improve this in the following year once the new eLearning program is established.</p> <p>4.3 Generally</p> <p>4.3.1 While the childcare industry saw workforce shortages following the COVID-19 pandemic, we consider the risk of modern slavery occurring to be lessened, as workers are in high demand and able to command better terms for their employment. During 2022 and in response to workforce challenges to attract and retain talented employees, OAC Group implemented a ‘You are Worth More’ rewards program. This saw wages and benefits improve for all childcare workers employed by OAC Group, with wage rates guaranteed to be a fixed percentage higher than the relevant workplace Award terms. This initiative has continued and been enhanced through this reporting period with the launch of OAC Rewards, a platform that provides additional benefits and cost savings to our employees.</p>
<p>Agency Staff</p> <p>3.2 The nature of our business, and a common and attractive feature of the childcare sector for some people, means that we have many employees employed on casual contracts. This enables us, and our employees, the flexibility to fill shifts in our different campuses as the needs arise. Where we cannot meet our operational needs using our casual employees,</p>	<p>4.4 Generally</p> <p>4.4.1 We maintain a dedicated casual employee recruitment function in-house and a large pool of employees on casual employment contracts to fill our shifts. Our casual employees are onboarded in alignment with our permanent employees.</p> <p>4.4.2 Where we are unable to use our own employees, we use agency staff from reputable and sector-specific agencies, who have the required</p>

<p>however, we use agency staff for this purpose, particularly in the roles of childcare educators and chefs. We understand and recognise that with agency staff there is less control over workers' terms and conditions and therefore an increased potential for these workers to be vulnerable to modern slavery risks.</p>	<p>4.4.3 qualifications and training for the role. The relationships between Only About Children and the agencies we use are managed as part of our supply chain, with appropriate due diligence measures in place. The workforce shortages experienced during prior reporting periods (since the pandemic) have continued into this reporting period. As a result, we are more heavily reliant on agency staffing contracts. During this reporting period we conducted an audit of our agency contract terms to ensure the necessary protections for agency workers are in place and any risk of modern slavery occurring is minimised. Though this audit was favourable in its findings, the business recognises there is an opportunity to improve compliance and address modern slavery risks by implementing our own standard service agreement and engage all agencies on similar robust terms. We will use the 2024 reporting period to compile our own standard contractual terms, that require compliance to modern slavery laws with specific prohibition on recruitment fees as well as obligations not to engage in modern slavery and actively report any instances of modern slavery occurring.</p>
<p>Acquisitions and Development</p>	
<p>3.3 Our business continues to expand and grow the number of campuses operating under the 'Only About Children' brand. In doing so, we are acquiring existing businesses and assuming risks in relation to those businesses, including risks relating to modern slavery.</p> <p>3.4 In addition to acquiring existing businesses, in this reporting period and going forward OAC Group are more actively pursuing growth opportunities through development of greenfield sites. We are mindful of the increased risk in the construction industry of modern slavery occurring.</p>	<p>4.5 Generally</p> <p>4.5.1 Our legal, human resources and acquisitions teams work together through the due diligence process to ensure that modern slavery risks are identified at the commencement of any acquisition process. Particularly, employee contracts and existing supplier contracts are scrutinised for any modern slavery risks. Working conditions and working rights of employees authorised to work under a work visa are also closely reviewed and referred to our external immigration agency when required. We ensure that any risks are appropriately addressed and include contractual obligations relating to anti-slavery laws within the transaction agreements.</p>

	<p>4.5.2 In building new childcare centres we are working with reputable landlords and developers that we have had long-standing and prior dealings with. However, we are mindful that the agreements as they relate to modern slavery obligations can be improved and this will be a focus for our next reporting period.</p>
<p>Our Supply Chain</p>	
<p>Suppliers</p>	
<p>3.5 Nearly all our suppliers are based in Australia, (with a small number based in developed countries such as the United Kingdom and New Zealand, being low risk for prevalence of modern slavery, particularly in the industries in which these suppliers operate). However, we are aware that some of our suppliers source goods or services from overseas, and this may include geographical locations or sectors with a higher risk of modern slavery.</p> <p>3.6 Considering indicators from the Global Slavery Index 2023 and the International Labour Organisation’s Global Estimates of Modern Slavery⁵, we have identified the following sectors within our supply chain that may have higher modern slavery risks:</p> <ul style="list-style-type: none"> 3.6.1 Cleaning services: through use of low-skilled or migrant workers; 3.6.2 Electronics suppliers: noting that the manufacture of laptops, computers and mobile phones particularly in China and Malaysia are at high risk of modern slavery; 3.6.3 Resources and garments: the products we purchase to furnish our campuses and equip our employees; and 	<p>4.6 Supply Chain Due Diligence</p> <p>4.6.1 Our focus is on gaining transparency of our supply chain and the risks of modern slavery that may be present within. By improving our understanding of the supply chain risks we can address these by making appropriate procurement decisions to mitigate the risks, and work with existing suppliers to ensure they have best practices in place to identify and address the risks in their operations and supply chain.</p> <p>4.6.2 During this reporting period we considered multiple options for undertaking supplier due diligence and ultimately engaged a third party (iPro) with an online platform to conduct modern slavery supplier risk assessments. The platform has now been implemented to assess, monitor and mitigate the modern slavery risks in our supply chain. Going forward, this will provide the business with internal efficiencies and a transparent view of the aggregated supply chain risk, whilst also providing a platform through which we can work with suppliers to assist them to improve their risk rating. Whilst the latter part of the reporting period was focused on implementing the solution and enabling the platform to be accessed by our suppliers, the 2024 reporting period will be used to gather data from suppliers relating to risks and analysing these to appropriately respond to them.</p> <p>4.6.3 During this reporting period (and into the next) we, in partnership with one of our biggest landlords, are installing solar panels for energy efficiency on all of their campuses that can accommodate solar panels.</p>

⁵ References above within ‘Our Supply Chain’.

Construction and manufacturing: through use of migrant workers or temporary labour and subcontractors as well as in the procurement of solar panels that have been installed at multiple campuses during this reporting period.

3.7 Our current visibility of the supply chain is limited to tier 1. Without a better understanding of the additional tiers within our supply chain it is not possible to ascertain measures or the extent to which we can address the risks of modern slavery occurring.

3.8 With many of our current suppliers having long-term relationships with the business, built on years of providing reliable and satisfactory services, our procurement practices are not formalised, nor do they include explicit enquiry of modern slavery risks.

The installation program is being undertaken by a reputable third-party contractor who procured all suppliers' adherence to modern slavery laws; suppliers, including the manufacturer in China, provided evidence of their commitment and compliance to modern slavery laws.

4.7 Contractual Clauses

4.7.1 Our building works and contractor template agreements include the requirement for suppliers to comply with anti-slavery laws, with severe consequences for failure to do so. We have successfully engaged multiple suppliers using these template agreements. Our approach during negotiations with suppliers is that these are non-negotiable terms.

4.7.2 When presented with another party's agreement for negotiation and signature, if there are no terms to enforce zero tolerance of modern slavery, we insert a mutual clause for compliance to anti-slavery laws.

4.7.3 While this reporting period has seen us implement improvements to supplier due diligence by conducting modern slavery supplier risk assessments through the online platform, we recognise that a response is not mandatory and accordingly response rates are reliant on the suppliers willingness to comply. During the 2024 reporting period we will review contractual clauses in our template agreements to update these and include an obligation to comply with our due diligence requirements. We will also seek to negotiate this into all supply agreements that are not our standard.

4.8 Online Contractor Management Portal

4.8.1 Our online portal in which contractors are required to undergo induction training includes modern slavery awareness training.

Continual Improvement

Each reporting period we:

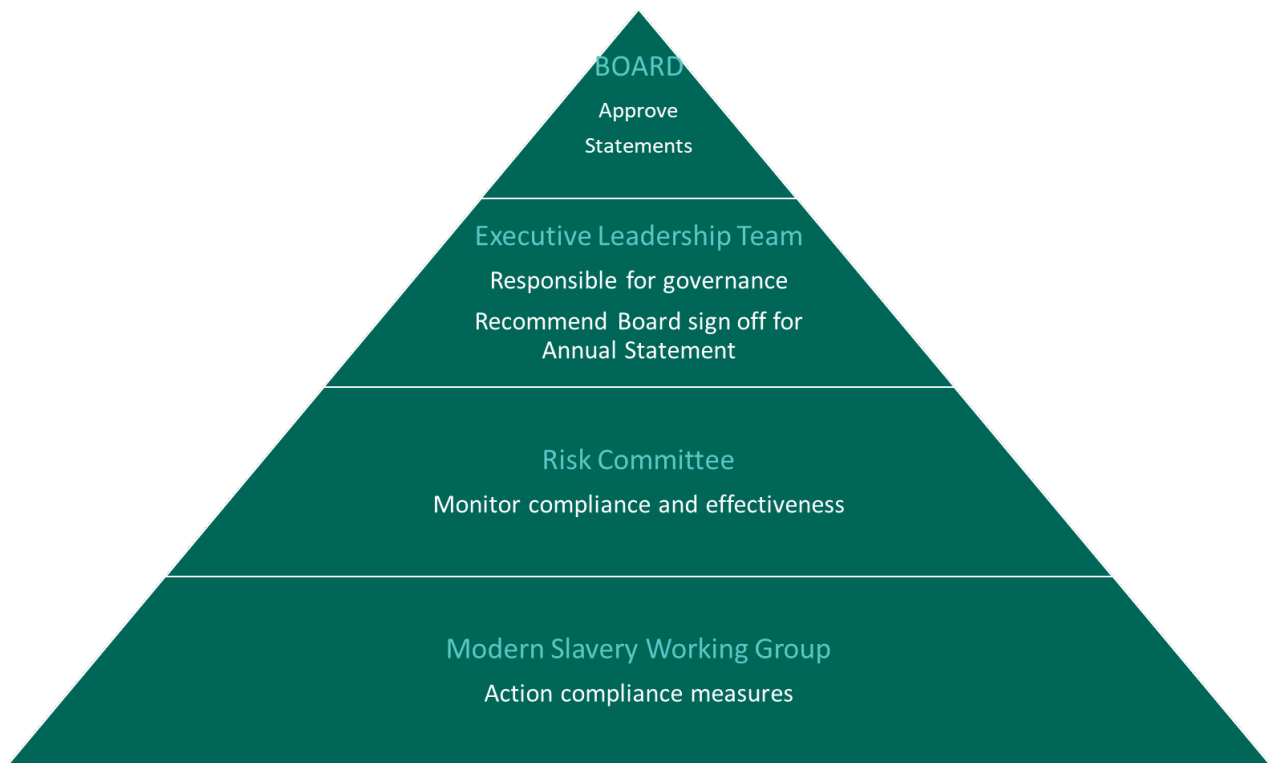
- continue to review our policies, documentation and training materials. This is done on an annual basis (unless required more frequently), with any updates or improvements implemented and communicated as necessary;
- continue to deliver education and training initiatives within our operations, highlighting the risks of modern slavery and how to identify and report these;
- continue to drive awareness and education of modern slavery and our zero-tolerance approach with suppliers, by:
 - performing annual risk assessments on existing suppliers to monitor their modern slavery risks and actions related to these; and
 - requiring all contractors to undergo the modern slavery training on our online induction portal as part of their engagement with OAC Group.

In the next reporting period, we:

- will analyse the data gathered from suppliers through our modern slavery risk assessment platform and appropriately respond to any risks raised.
- will revise our eLearning compliance modules to include modern slavery within our Code of Ethics and Conduct training, for completion by all staff in induction.
- will implement our own standard service agreement for the engagement of agency staff on similar robust terms. New standard contractual terms will require compliance to modern slavery laws with specific prohibition on recruitment fees, obligations not to engage in modern slavery and actively report any instances of modern slavery occurring.
- we will review the contractual clauses in our existing template agreements, updating these to include an obligation to comply with our due diligence requirements, including any modern slavery risk assessment. We will also seek to negotiate this into all supply agreements that are not our standard.
- we will review our agreements for construction and lease of new child care premises to implement robust standard clauses relating to modern slavery and ensure these are included in future contracting.

5. Describe how the reporting entity assesses the effectiveness of these actions.

- 5.1 In each reporting period, we monitor the areas identified as risks in our operations and supply chain, noting the impact of any measures implemented in our previous reporting periods.
- 5.2 Our focus on education, training and reporting mechanisms has enabled us to continue to engage our workforce and suppliers in raising awareness of modern slavery risks and practices. There were no reported instances of non-compliance with our updated policies relevant to modern slavery, nor any reports of modern slavery practices occurring.
- 5.3 In relation to our bespoke modern slavery online learning module, (mandatory training for all permanent employees), our completion rate was averaging 63% in prior years. This completion rate is reflective of the fact that the largest proportion of our permanent staff are engaged as child care educators and required to prioritise the delivery of childcare services. In order to expand modern slavery awareness across the business, we identified measures to improve the delivery of this training. We aim to include a modern slavery awareness training within our Code Of Ethics And Conduct eLearning, for completion by all staff (permanent and casual) during the induction process, whilst retaining the bespoke Modern Slavery Online Module for completion by a targeted, relevant audience. Through this restructured delivery of eLearning we will monitor the completion rates, that we anticipate will be greatly improved from prior years.
- 5.4 Modern slavery risks and actions to address these are reported to our Risk Committee. The Risk Committee review all actions and consider the risk framework established for the business. The Risk Committee also reviews the business KPIs and performance in relation to operational matters including grievances, whistle blowing and workplace health and safety. Through this existing mechanism we can monitor the effectiveness of our actions within our operations.
- 5.5 We have implemented a structural framework that promotes continual review and improvement of measures to reduce modern slavery risks, ensuring that our actions can be more effectively assessed. This has, during this reporting period, been updated to reflect changes in the operational side of the business following the acquisition by Bright Horizons. The legal team has ultimate responsibility for managing the modern slavery compliance process and comprises the basis for a working group (that may include relevant departmental representatives as required), to assess and action modern slavery risks. All legal/working group actions are reported to and monitored by the Risk Committee, with ultimate reporting to the Executive Leadership Team ('ELT') who are responsible for ensuring corporate governance and compliance systems are maintained within the OAC Group, to support the wider Bright Horizons compliance and public reporting to the U.S. Securities and Exchange Commission. This framework is represented in the below diagram:



5.6 Following acquisition by Bright Horizons, the reporting framework outlined above has proven to be an effective means of managing risks and monitoring effectiveness of actions within the OAC Group, with support and transparency throughout the business and to management.

6. Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls

6.1 Members of the Risk Committee (being senior and executive management, representing all entities in OAC Group) are aware of and discuss the reporting requirements under the *Modern Slavery Act 2018* (Cth), the risk framework of the business and actions being taken to ensure that the business is actively working towards identifying and mitigating the risks of modern slavery in its operations and supply chain.

6.2 The Risk Committee reports to the Executive Leadership Team, which includes at least two representatives from all OAC Group entities' boards of directors. Through this collaboration the group is instrumental in considering and shaping the governance and controls relating to modern slavery risks as part of the overall risk management framework.

6.3 Together they contribute to developing the content of the Modern Slavery Statement, which is approved by the ELT and recommended for signature by the ultimate parent entity, for submission on behalf of the OAC Group.

6.4 Accordingly, the process of consultation is effectively joint among the OAC Group entities, with knowledge of, and contribution to, the development of the statement across all entities.

7. Any other information that the reporting entity, or the entity giving the statement, considers relevant.

7.1 No further information of relevance.

Approval

This modern slavery statement was approved by the principal governing body of BlueTang Holdings Pty Ltd as defined in the *Modern Slavery Act 2018* (Cth) (“the Act”) on 27 June 2024.

This modern slavery statement is signed by a responsible member of BlueTang Holdings Pty Ltd as defined in the Act.



Anna Learmonth
Director