

## MODERN SLAVERY STATEMENT

December 2022

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 has 150 permanent employees (full and part time); The Book House has an additional 25 permanent employees; Insight Publications has 15 employees. Campion 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 warehouse 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 800 suppliers who provide goods and services for resale, goods not for resale and for services to 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 Campion 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.

Goods for sale are packed and distributed from Campion sites primarily to the parents and students who have ordered them or to schools.

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

Suppliers to Campion 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 may be some modern slavery risk in these supply lines.

Campion is currently undertaking a review of its supplier risk assessment process to provide a more clear and objective understanding of potential risks.

This assessment includes a Risk Matrix, utilising tools and data by company, product, industry and location together with other internal and external knowledge, identifying level of risks that exist within our operations and supply chains.

**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**

Campion commits to monitoring, managing and addressing the risks of Modern Slavery in our supply chains. By 31 June 2023 our goal is to:

1. Consult with and have all suppliers accept our Ethical Sourcing Policy Agreement or Contractor Management Agreement
2. Profile each major supplier and contractor through our Risk Matrix assessment
3. Where the Risk Matrix flags suppliers as medium or high risk of Modern Slavery (due to companies, individuals, products, locations or non-acceptance of the Ethical Sourcing Agreement), Campion engages to conduct further investigations to better understand the risk. This could include requests for additional information or externally sourced audits.

**Relevant policies and agreements produced by Champion:**

- **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 Champion. Relevant expectations include business integrity, labour rights, working conditions, child labour, wages and working hours, and ethical sourcing
- Champion 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 Champion's Ethical Sourcing policy.

**Campion Management**

Campion have recently partnered with social governance supporting affiliation partner Sedex. 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 continually review and refine the Ethical Sourcing Policy, as well as including the process for remediation for suppliers where this is identification of modern slavery breach within its operations or supply chains.

**Campion Staff Training:**

- 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
- All Champion team members are required to conduct a yearly online training course or update
- Modern Slavery training for all relevant supply chain staff has been sourced and will be rolled out in FY 2023.

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

**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**

Insight Publications joined Champion (October 2022) and will undergo a process of alignment with the organisations systems and processes included the planned application of the ethical sourcing policy across Champion suppliers.

## **7. Provide any other relevant information.**

### **Appendix: Establishment of Ethical Sourcing Policy and Agreement**

Campion has produced an 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.

#### 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 Campion: Marc Makrid, Brad Fenner, David Uhrig, Robert Uhrig, James Cathro.



**James Cathro, Managing Director**

**20 December 2022**