2025 MODERN SLAVERY STATEMENT

CEM

CHRISTIAN EDUCATION MINISTRIES

This Modern Slavery Statement (MMS) is submitted on behalf of Christian Education Ministries Ltd (ABN 65 124 826 722), under section 13 of the Modern Slavery Act 2018 (Cth)(MSA) to cover the reporting period of 1 January 2025 to 31 December 2025.

The MSS was approved by Christian Education Ministries Ltd's Board of Directors on 20 May 2026 on behalf of all entities covered by the MSA. The MSA is signed by the Chief Financial Officer as a duly authorised representative of Christian Education Ministries Ltd's Board.

Matthew Gray
Chief Financial Officer

Cover Image: ACC Benalla

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ABOUT US

Christian Education Ministries Ltd (CEM) is a not-for-profit, non-denominational, Christian organisation involved in various aspects of Christian Education, including the delivery of primary and secondary education, delivery of school support services, developing curriculum, operating early learning centres and helping home schoolers. The organisation manages ten distinct brands:

1. Our schools operate under the brands:
   - Australian Christian College (ACC)
   - Medowie Christian School
   - Brightwaters Christian College
   - Heritage Christian School
   - Swan Hill Christian School
   - Bairnsdale Christian College
2. Our early learning centres and out-of-school-hours (OOSH) centres operate under the Smartplay Early Learners brand (Smartplay)
3. Our support to families choosing to home-school their children is provided under the Australian Christian Home Schooling brand (ACHS)

Under each of these brands CEM is pursuing its mission to develop each and every student to be equipped spiritually, academically, socially and physically to flourish into their full potential, and be a positive influence on the world around them.

CEM has eight (8) wholly-owned operating subsidiaries, none of which is a reporting entity for purposes of the MSA. The Reporting Entity under the MSA is Christian Education Ministries Ltd (ABN 65 124 826 722) and each of the following:

In New South Wales

- Australian Christian College Ltd (ABN 24 125 965 862), which operates schools in Marsden Park, Singleton, Brightwaters, Medowie and Port Macquarie

In Western Australia

- Australian Christian College – Western Australia Ltd (ABN 45 121 476 024), which operates schools in Albany and Brookdale

In Queensland

- Australian Christian College – Queensland Ltd (ABN 86 125 183 637), which operates a school in Caboolture

In Tasmania

- Australian Christian College – Tasmania Ltd (ABN 53 620 450 651), which operates schools in Hobart, Launceston and Burnie

In Victoria

- Australian Christian College – Victoria Ltd (ABN 49 005 784 627), which operates schools in Benalla, Skye and Echuca
- Bairnsdale Christian Community School Inc (ABN 76 447 460 787), which operates a school in Bairnsdale
- Son Centre Christian School Ltd (ABN 39 056 886 769), which operates a school in Swan Hill*

* Effective 1 January 2026, this school was transferred to Australian Christian College - Victoria Ltd, and the transferor entity became dormant.

Operating Nationally

- Smartplay Early Learners Pty Ltd (ABN 92 633 199 934), which operates early learning and/or OOSH centres in Caboolture, Medowie and Marsden Park

This statement describes the supply chains and operations of CEM and its above-named subsidiaries. CEM operates a central services model across its subsidiaries, with financial management and procurement largely managed from CEM. As a result, procurement processes and actions designed to mitigate modern slavery risks are consistently implemented across all entities.

All of the individual entities described above have been consulted in relation to the preparation and contents of this statement, and in relation to CEM's modern slavery response generally.

CEM is committed to operating responsibly and establishing and adhering to Christian principles and values, which at their core seek to recognise the value of, and seek to extend God's love and grace to, all people.

ACC Moreton

STRUCTURE AND OPERATIONS

Through its subsidiaries CEM owns and operates independent Christian schools, early learning centres and OOSH centres throughout Australia. CEM provides governance and strategic leadership support, and a range of central professional services to its subsidiaries. None of these subsidiaries individually meets the reporting threshold under the MSA.

CEM and all subsidiary companies are registered as charities with the Australian Charities and Not-for-Profits Commission, and are governed by a board of directors at each individual company's level. The Principal of each school is responsible for the day-to-day management and operations of the School, reporting to their respective Boards and the Chief Executive Officer.

The principal activity of each School is provision of primary and secondary education. Smartplay Early Learners Pty Ltd provides early learning and OOSH centres as described above.

ACC Echuca

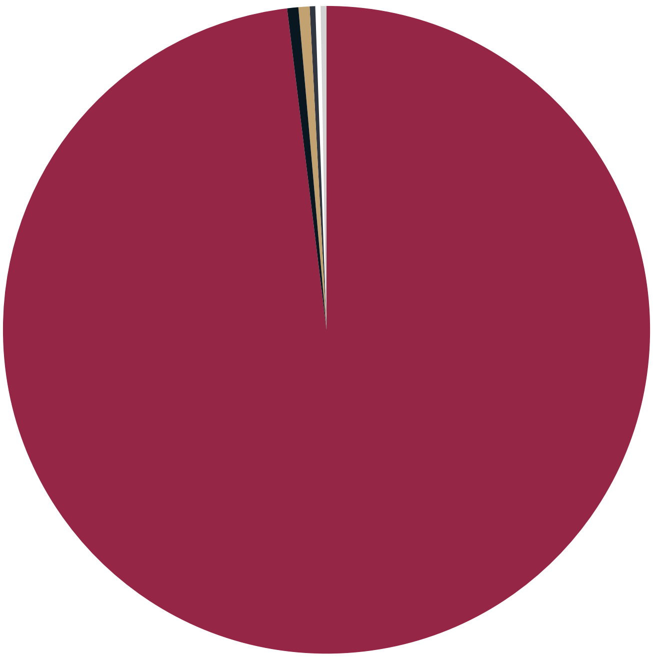
SUPPLY CHAINS

Approximately 71% of CEM's operational cost base is represented by employment-related costs (all staff are employed within Australia and the significant majority of staff are employed pursuant to industrial Awards and other approved industrial agreements), with a further 8% represented by depreciation, interest, financing and other non-cash expenses.

The remaining 21%, plus CEM's capital expenditure, (hereafter "the supply chain") has been subjected to supply chain risk analysis where the expenditure with the individual supplier exceeds $20,000. This represents 262 suppliers who collectively represent 89% of CEM's supply chain. CEM's total Tier 1 supply chain represents 2,009 suppliers such that the suppliers not subjected to supply chain analysis represent 1,747 suppliers with an average annual expenditure of approximately $3,190, of which 99% are Australian suppliers.

CEM and its subsidiaries employed 840 full-time equivalent staff for the reporting period. Our employees filled roles primarily in primary and secondary school teaching (63%), school administration and support (34%), and early learning centres (3%).

The vast majority of CEM's Tier 1 supply chain is located in Australia, as represented in the pie chart below. This localised supply chain provides CEM with a greater level of influence over the practices of its suppliers, which will be a factor in our future actions to address modern slavery risks. Significantly, 98% of CEM's TSF arises from Australian suppliers.



Country	Sum of Spend
Australia	$49,524,184
Ireland	$337,096
United States	$277,694
Singapore	$184,500
United Kingdom	$71,591
Canada	$67,239
New Zealand	$32,256
Spain	$2,169
Grand Total	**$50,496,729**

Figure 1: CEM's Tier 1 Supply Chain

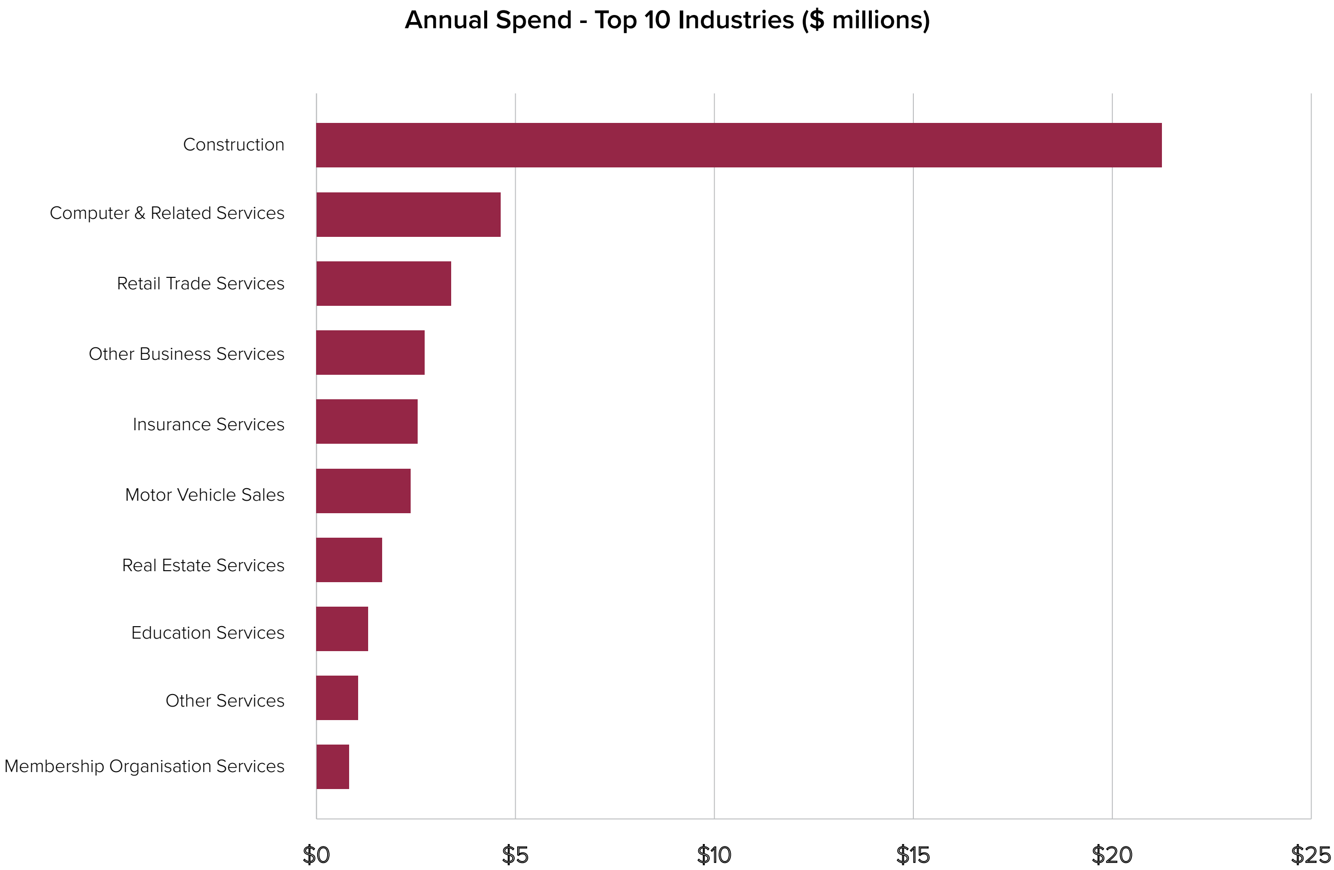


Figure 2: Annual Spend

SUPPLY CHAIN RISKS

Through the risk analysis CEM has gained a deeper understanding of its supply chain risks across a range of metrics, including by supplier, industry, and country. Supply chain risk is represented in the 'theoretical slavery footprint' (TSF) which indicates the theoretical number of people in conditions of modern slavery within the supply chain.

CEM's TSF for the year was 1.11. While it is currently difficult to benchmark this figure we consider this to be a relatively low level of risk.

CEM's top 15 risk industries represent 67% of the supply chain spend. One (1) industry is rated moderate risk, one (1) moderate/low risk, and the remaining thirteen (13) are rated low risk in terms of theoretical slaves/$M of spend. When applied to the actual spend with the relevant industry suppliers, the top 15 risk industries account for 95% of CEM's TSF. Said differently, the majority of CEM's supply chain is spent in relatively low-risk industries.

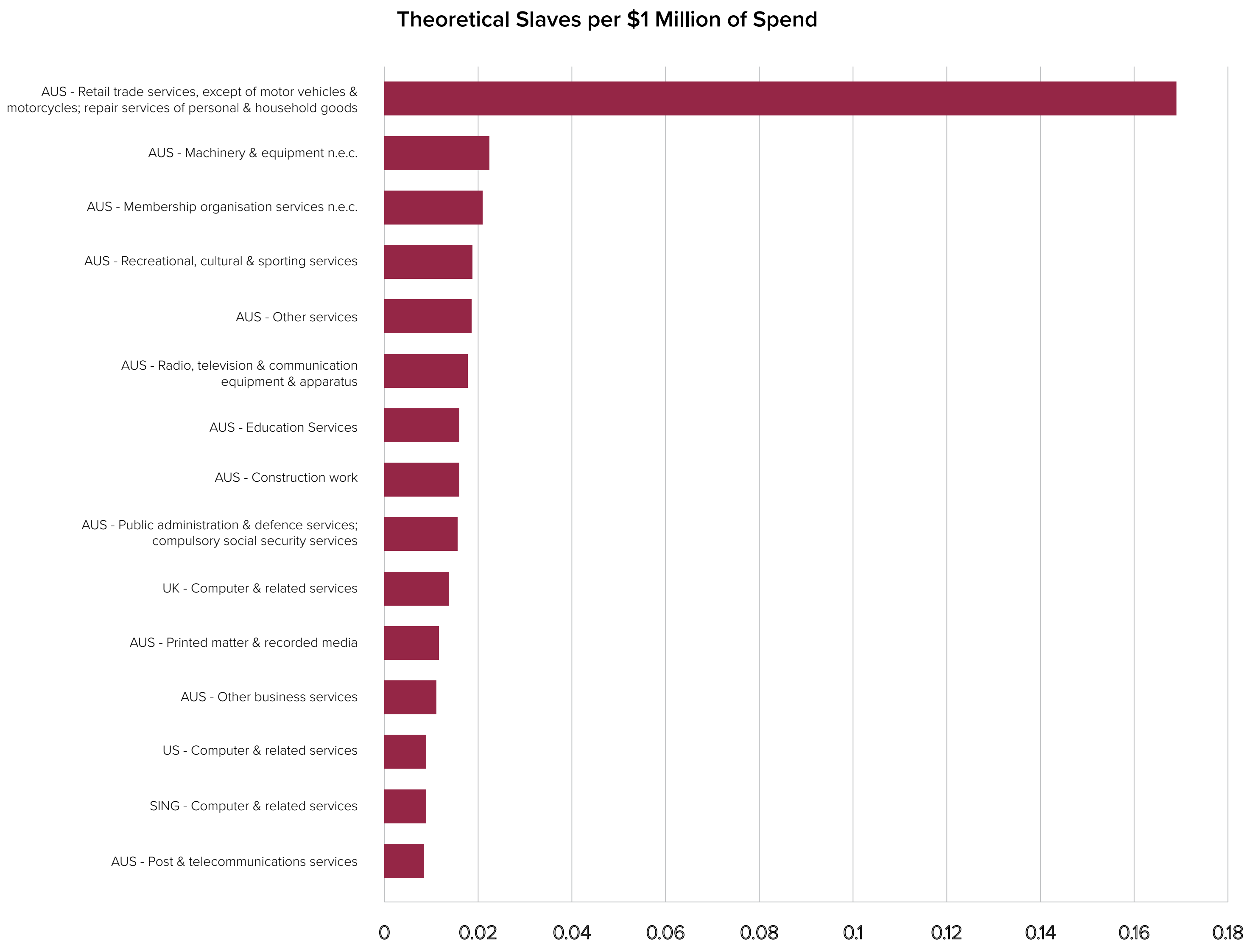


Figure 3: Risk Industries

The three industries with the highest contribution to TSF are:

- Australian retail trade services (except motor vehicles and motorcycles; repair services of personal and household goods) (moderate risk): CEM acquires furniture and other plant and equipment for use within its schools. CEM's total value of expenditure within this industry is approximately $3.4 million.
- Australian construction services (low risk): CEM acquires a significant amount of construction services from suppliers within this industry. CEM's total value of expenditure within this industry is approximately $21.25 million.
- Australian Other Business Services (low risk): CEM acquires professional services largely in the nature of consulting (management, architectural, engineering services). CEM's total value of expenditure within this industry is approximately $2.7 million.

ACC Hobart

SPECIFIC SUPPLIER RISK

Using the risk analysis, CEM has ranked each of its suppliers with a total annual spend greater than $20,000 by risk level. This enables greater due diligence and engagement with higher risk suppliers to ensure that CEM is able to influence anti-modern slavery practices in the highest impact areas of its supplier base through supplier agreements and other direct engagement.

Further information about CEM's future measures is provided in later sections.

Operational risks

CEM provides (either directly or through a subsidiary):

- Early Learning, for children aged 3-4 in Australia
- Schooling for international and local children aged 5-18 in Australia
- Out-of-school-hours care for children aged 5-18 in Australia

We acknowledge potential risks that CEM's operations present through:

- the engagement of Tier 1 suppliers within Australia which might contain a higher risk of modern slavery (e.g. security and cleaning services, building and construction services), appreciating that the 2023 Global Slavery Index estimates that Australia had 1.6 people per thousand in modern slavery; and/or
- the supply chain of CEM's suppliers where those supply chains are conducted in countries, or involve upstream suppliers, with greater modern slavery risks (e.g. in the manufacture of computer and other electronics, solar panels, and garments manufactured offshore for use within CEM's operations).

CEM has detailed below the actions taken in order to address those potential risks.

ACC Moreton

Actions taken to assess and address risks

During the year ended 31 December 2025, CEM continued to monitor its suppliers and organisational spend with each, the industries in which they operate, and analysed our modern slavery footprint as a means of identifying future actions to mitigate potential supply chain risks.

The actions taken have included:

1. We have refreshed our supply chain risk analysis based on the 2025 spend data.
2. We have implemented processes and systems to better manage the onboarding of new suppliers (through centralisation of related procurement functions) to ensure that the required data elements for new suppliers are captured and inform future risk assessments.
3. For all suppliers where expected spend in any given year may exceed $500,000:
   - considered any provisions in supply contracts which go to the mitigation of modern slavery risks; and/or
   - reviewed Modern Slavery Statements published by suppliers to assess their response to mitigating modern slavery risks in their supply chains.

The segment of CEM's supply chain referred to in action 3 represents a significant portion of the total, non-salary and wage supply chain, as set out below:

ACC Burnie

Total spend in 2025	Number of Suppliers	Total spend ($million)	Average spend ($million)	Proportion of supply chain	Percentage of TSF
Greater than $400,000*	16	$26.271 million	$1.645 million	**52.06%**	**53.9%**
Less than $400,000*	1,993	$24.225 million	$0.012 million	**47.94%**	**46.1%**

* being the point at which annual spend may approach the $500,000 threshold under CEM's Modern Slavery policy

The effectiveness of actions taken to mitigate modern slavery risks in CEM's supply chain is monitored through the following:

<table>
<tr><th>Risk mitigation</th><th>Assessment</th></tr>
<tr><td>For all suppliers where expected spend in any given year may exceed $500,000:
considered any provisions in supply contracts which go to the mitigation of modern slavery risks; and/or
reviewed Modern Slavery Statements published by suppliers to assess their response to mitigating modern slavery risks in their supply chains.</td><td>Eight of the 16 suppliers had published Modern Slavery Statements as a result of application of the MSA or through voluntary disclosure which are filed on supplier records.
Three of the suppliers without any published Modern Slavery Statement, likely due to size of the organisation, provided construction services to CEM in which our contractual terms included provisions aimed at mitigating modern slavery risks.
Of the five remaining suppliers:
one merely supplies leased premises in Australia;
one was a vendor of real estate purchased by CEM;
two were Australian-based suppliers of construction and consulting services respectively; and
one was an Australian-based consultancy which did not exceed the $500,000 threshold under CEM's policy.
In all cases we consider the modern slavery risks to be low.</td></tr>
<tr><td>We have refreshed our supply chain risk analysis based on the 2025 spend data.</td><td>As noted in the other sections of the MSS, CEM's TSF of 1.11 is considered to represent a relatively low level of supply chain risk.</td></tr>
<tr><td>We have implemented processes and systems to better manage the onboarding of new suppliers (through centralisation of related procurement functions) to ensure that the required data elements for new suppliers are captured and inform risk assessments.</td><td>Onboarding of suppliers is now entirely centralised to a small, specialist team
Key attributes which are relevant to supply chain analysis are captured and a review of the relevant data elements is undertaken annually</td></tr>
</table>

ACC Hobart

Looking ahead

CEM is cogniscent of the need to be alert to changes in supply chains which may elevate risk from time to time, and the need to respond as circumstances change. Yet it is relevant that in the years that CEM has analysed its supply chain risks to assist in MSA compliance that the same drivers of low risk remain unchanged:

1. The cost base is significantly Australian salary and wage costs with employment terms largely governed by relevant industrial awards.
2. The non-salary and wage supply chain is almost entirely comprised of Tier 1 suppliers based in Australia.
3. The industries from which CEM's supply chain is sourced have predominantly and consistently been low risk.
4. Supply chain spend is skewed heavily towards Australian construction which is considered low risk and for which we have developed contractual documents with provisions aimed at mitigating modern slavery risks.

During the year ending 31 December 2026 CEM will:

1. Continue to pursue the risk mitigation actions outlined above, and assess effectiveness periodically throughout the year.
2. Implement new procurement systems which will embed decision-making as to supplier choice prior to contract, and seek to automate stop-go decisions based on supplier characteristics which might indicate a higher level of modern slavery risk.

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