



# Modern Slavery Statement

Camp Australia Pty Ltd (ACN 060 703 120)

July 2019 - 30 June 2020



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# Introduction

This statement outlines actions and approaches we at Camp Australia have taken to identify, mitigate and deal with any risks of modern slavery through our supply chains and operations.

We are in the business of caring for children. Our brand promise is to guide children's growth, and children are at the heart of everything we do. We provide tailored enrichment to children before school, after school and on their school holidays.

To deliver on our brand promise, we operate in accordance with our principles which include being community-focused and ensuring we have engaged performing people. We are committed to fostering a safe, inclusive environment where children can learn, have fun and connect and a workplace where our team members are rewarded, recognised and listened to every day.

At Camp Australia, we are committed to continuous improvement and a strategy to prevent modern slavery in our supply chains and operations.

This statement is made pursuant to the Australia Modern Slavery Act 2018 (Cth) (**the Act**) in respect of the period 01 July 2019 to 30 June 2020 by the reporting entity Camp Australia Pty Ltd ACN 060 703 120, a private Australian company.



# Our Business and Supply Chains

## 2.1. Structure

From humble beginnings in 1987, Camp Australia has grown to be Australia's largest provider of outside school hours care and holiday care, providing millions of care sessions every year for over 50,000 children across 560 schools nationally on 30 June 2020.



**50,000+**  
children



**560**  
schools  
nationally



**2,500+**  
employees  
nationwide



**~160**  
corporate office  
employees

## 2.2. Operations

Our Camp Australia corporate offices are located in Melbourne, Australia. As of 30 June 2020, Camp Australia directly employed approximately 160 employees at its corporate office, and approximately 2,500 employees nationwide.

The core services provided are Before and After School Care and Holiday Care for non-school aged and school-aged children.

Our vision is 'to support all families in achieving their dreams'. We see our role as being of societal value by giving support to working families, parents and carers, those studying, or who need extra support in caring for their children.

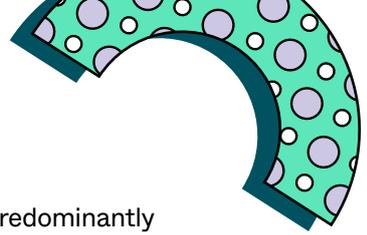
For schools, we provide societal value through (i) positioning the OSHC service as an added value of the school, (ii) ongoing investments we make towards school facilities to improve the OSHC experience, (iii) additional resources, (iv) staffing and the highest level of training in OSHC care. The additional training of our staff in Autism Training, Additional Needs, Resilience Training and Positive Psychology, Mindfulness, and working with disadvantaged schools, children and families provide a platform that allows all children to be included and is what sets Camp Australia apart.

Our approach to partnering with stakeholders is based on our principles – namely "Relationships Matter" and "Community Focussed". Here we actively provide to parents, schools and the wider school communities which we serve direct feedback portals to assess, inform and improve how we partner with them.

We encourage open and transparent communication and feedback with our employees and emphasise ethical behaviour and conduct within our employment practices and experience in school communities.

We aim to improve continuously, and many of our internal indicators across parent, principal and employee satisfaction indices demonstrate improvement across this timeframe.





### 2.3. Supply Chain

At Camp Australia, our supply chain consists of goods and services that support childcare services to children in attendance – including food and educational resources.

Our sector is generally assessed as being at low risk of having modern slavery situations present within it.

We deliver care services solely in Australia. This country has been assessed as having a lower prevalence of modern slavery and an active government response to dealing with the issues.

The most significant expenditure of our business is on the remuneration of corporate office and service team members. After that, our supply chain is predominantly related to expenditure that provides the technology infrastructure, facilities and other support required to deliver our children’s care services.

Our immediate suppliers are predominantly based in Australia and the Philippines. The risk of modern slavery in Australia is generally deemed as low. However, some Australian suppliers may source goods or services from overseas, including jurisdictions with a higher risk of modern slavery. Whilst the Philippines has a higher prevalence of modern slavery, the risk with this supplier is low due to their Australian ownership and compliance with the Anti-Modern Slavery and Trafficking in Persons Policy and framework.

## Risks of Modern Slavery

We have reviewed our operations and supply chains’ scope. It has identified the following sectors that may have high modern slavery risks.



### 3.1. Operations

- At Camp Australia, we employ many educators in services, some of whom may be less aware of their rights and/or vulnerable to exploitation. These educators are governed by the Children’s Services Award 2010 and the Education and Care Services National Law Act. Our compliance with the Award and Act ensures employees are protected from any risk of Modern Slavery.
- We utilise one of the largest managed operations providers in the Philippines to provide support through a Global Support Centre, with approximately 123 individual employees.

### 3.2. Supply Chain

- The Act also binds the largest suppliers (outside of employment) to our business due to the size of their businesses.
- We may procure some goods from suppliers located in or who source goods from countries or regions estimated to have a higher prevalence for modern slavery. As a result, these goods have an increased modern slavery risk. For instance, uniforms for use in services and the manufacture of laptops, computers and mobile phones, particularly in China, are at high risk of modern slavery.
- We may utilise the services of Cleaning companies or agencies that employ foreign workers, or people on temporary visas, outside of hours.

# Actions Taken to Address Modern Slavery Risks

## 4.1. Workforce

At Camp Australia, we considered whether modern slavery practices exist within our workforce, noting that:

- Our corporate and services are all located in Australia, estimated to have a low prevalence of modern slavery.
- We have numerous policies to encourage expected behaviours within its operations, including a Whistleblower Policy.
- We provide all our employees access to an Employment Assistance Program (EAP). The EAP offers confidential psychological counselling and introductory legal advice (non-work related) at no cost.
- We have an in-house Human Resources team, which can be accessed in multiple ways by employees, including via an HR Hotline and a thorough recruitment and onboarding process, which requires that each new employee reads and confirms acknowledgement and understanding of our Camp Australia policies.
- Our employees working within services are regulated by the Children's Services Award 2010.
- We utilise one of the largest managed operations providers in the Philippines to provide support through a Global Support Centre, with approximately 123 individual employees.

After considering this risk, we have concluded that it is a low risk that modern slavery exists within our workforce.

## 4.2. Global Support Centre

At Camp Australia, we considered whether modern slavery practices exist within the Global Support Centre and note that:

- The provider is Australian owned and one of the largest and most experienced managed operations providers in the Philippines, with 4,000 staff supporting Australian, American and European companies since 2006. They have supported our business since July 2015.
- The provider has its own Anti-Modern Slavery and Trafficking in Persons Policy and framework, which is complimentary to the aims and objectives of the Act.
- The most recent services agreement with us includes specific references and warrants regarding the Act.

After considering this risk, we have concluded that it is a low risk that modern slavery exists within the Global Support Centre workforce.



### 4.3. Supply Chain

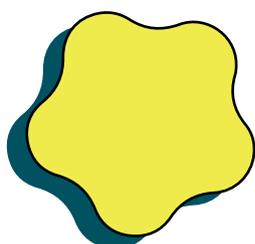
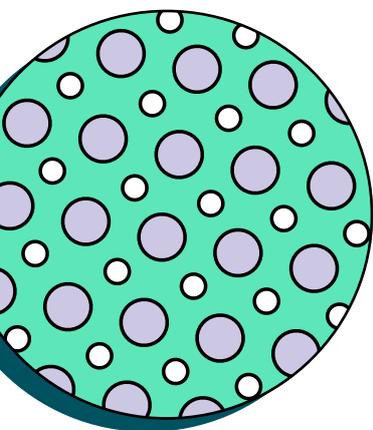
Our largest supplier has been conducting supplier modern slavery risk assessments since 2017 and concludes that there is a low risk of modern slavery existing within the supply chain.

We have little visibility of the supply chain for the remaining suppliers, however, the small number and nature of goods and services provided by these suppliers indicates there is only a minor risk of modern slavery existing within the supply chain.

### 4.4. Audit & Risk Committee

Our Audit & Risk Committee at Camp Australia is charged with assisting the Board in fulfilling its responsibilities for corporate governance and oversight of the risk management framework, controls and systems. The committee's purpose is to assess and respond to risks such as modern slavery.

Our Audit & Risk Committee meets quarterly to review the major risks of the business and develop action plans to address and mitigate these risks. In determining the major risks of the business, we have considered the Act and has determined the current risk to be low. This risk will continue to be monitored and discussed in the quarterly meetings when required. If it is identified that the risk level has increased, the committee will develop an action plan to mitigate any exposure or risk.



# Effectiveness of Actions

In considering the above, whilst we have not discovered any specific modern slavery issues within its operations or supply chain, the actions taken have:

- Provided our management with greater insight into our major modern slavery risks in the operations and supply chain; and
- Educated key personnel on modern slavery.

# Consultation

Key members of our Executive Leadership team at Camp Australia have been consulted in preparing this Statement, with Directors of the business involved in the review and finalisation process.

This statement was approved by the board of Camp Australia Pty Ltd on 8th June 2021.



**Igor Merkin**  
CFO  
Camp Australia Pty Ltd

