



Modern Day Slavery Statement

As a leading early education and care provider, we insist on upholding the highest standards and ethics at every level of our business. We are committed to acting with integrity, honesty, transparency and fairness in all aspects of our operations, to uphold our ethical standards and to protect our employees, families and reputation.

Busy Bees' vision is to give every child the best start in life, underpinned by our values of Care, Quality, Service and Value. These values are reflected in our Code of Conduct, which is provided to all employees to make clear the expectation that we operate to the highest standards in everything we do.

We recognise that modern slavery is a growing global issue, and acknowledge our responsibility for preventing, mitigating and addressing these risks in our business and supply chain. We will treat people in our business and supply chains fairly and will not tolerate slavery, servitude, bonded, forced or compulsory labour in any part of our business or supply chains. We do not knowingly engage with suppliers that use slavery, servitude, bonded, forced or compulsory labour in any manner.

Phil McKenzie
CEO, Australia





This statement is made jointly by the reporting entities Busy Bees Australia Holding Pty Ltd, Busy Bees Australia Bidco Pty Ltd, Busy Bees Early Learning Australia Pty Ltd and Think Childcare Pty Ltd (together, “Busy Bees Australia”), and has been prepared in accordance with the requirements of the Modern Slavery Act 2018 (Cth) for the financial year ending 31 December 2025.

Busy Bees Australia is part of an international group with headquarters in the UK (“Busy Bees”), which globally owns and operates a portfolio of childcare centres.

Our organisation

Since inception in the UK in 1983, Busy Bees has become synonymous with high quality care and education. With its entry into the Australian market, Busy Bees has brought to Australia its practical, child-centred approach, where children are respected as individuals and encouraged to learn and develop at their own pace within a ‘home away from home’ environment that meets rigorous safety standards.

Building on the existing local Australian roots overlaid with best practices from across the global Busy Bees’ network that extends to ten countries, crossing four continents, Busy Bees Australia has grown to become one of the largest providers of early learning and care in Australia. Busy Bees Australia owns more than 130 operating childcare centres across Queensland, New South Wales, the Australian Capital Territory, Victoria, South Australia and Western Australia and its workforce comprises approximately 3,300 employees (permanent part-time, full-time and casual) supported by consultants and agency workers where required.

Our values - Care, Quality, Service and Value - underpin everything that we do across our centres and our National Support Centres. Attracting the highest quality educators for our centres and the highest calibre of department expertise is key in delivering exceptional early childhood education and care. Busy Bees remains dedicated to its vision to give every child the best start in life and stands by these quality standards in Australia and internationally.

In addition to the reporting entities identified above, the Busy Bees Australia group includes a number of entities, being subsidiaries or related bodies corporate, of the reporting entities. However, the business in Australia operates under one single brand and has centralised governance structures and policies in place across all its corporate entities.

Our people

The Busy Bees Australia workforce is made up of direct employees, contractors and agency workers. We have effective systems and controls in place to address the risk of modern slavery. In particular, we:

- have robust recruitment and employment screening policies and procedures for all employees and agency workers;
- check the names and addresses, references, legal rights to work and police record of our employees and agency workers;
- ensure all team members have their own bank account and request verification of these details from new employee; and
- identify when banking details change and where there are no readily evident reasons for the change, we contact the employee directly to confirm the change.

We only use reputable recruitment and staffing agencies, and ensure all agencies that supply workers to us:

- undertake relevant background checks;
- ensure agency workers have required rights to work; and
- are contractually committed to carrying out checks on the workers they provide in a manner that complies with all laws, including modern slavery laws.

We provide our team members with a confidential and anonymous Speak Up helpline (managed by an independent provider 24/7, 365 days a year) where they can raise any concerns in respect of modern slavery in our business or our supply chains. Our helpline is supported by our Global Speak Up policy, with all our staff trained annually on the requirement to Speak Up to help Busy Bees address any suspected misconduct.

In 2025, Busy Bees Australia did not receive any reports of modern slavery concerns in relation to our workforce.

Our confidential Employee Assistance Program also provides our team members with a secure way of seeking advice about any modern slavery issues personally affecting them or their families.

Our supply chain

Our primary suppliers support our childcare centres, including food, resources, consumables, cleaning and maintenance services.



Busy Bees Australia applies a risk-based approach to supplier due diligence to identify, assess and address modern slavery risks in our supply chains. This approach considers factors such as the type of goods or services provided, the use of low-skilled or temporary labour, the level of subcontracting, and the geographic location of suppliers and their operations.

As part of this framework:

- Supplier onboarding: new suppliers are subject to due diligence processes proportionate to their risk profile, which may include review of relevant policies, and assessment of their approach to managing labour practices within their operations and supply chains;
- Risk segmentation: suppliers are categorised based on inherent risk, with higher-risk suppliers subject to enhanced due diligence and monitoring;
- Ongoing monitoring: we conduct periodic reviews of selected suppliers, including targeted audits and engagement with suppliers on their modern slavery controls and practices; and
- Contractual controls: our standard form agreements include obligations requiring suppliers to comply with modern slavery laws, maintain appropriate policies and controls, and notify Busy Bees Australia of any actual or suspected modern slavery risks or incidents.

Where appropriate, Busy Bees Australia works with suppliers to improve their practices and strengthen their approach to modern slavery risk management.

This framework will continue to be developed as part of our broader program to enhance supply chain visibility and strengthen our risk-based approach to supplier assurance.

We will not knowingly engage with any organisation involved in modern slavery or human trafficking. In 2025, we did not receive any notifications of any of our suppliers failing to comply with their modern slavery obligations or Busy Bees' expectations in this regard.

The majority of Busy Bees Australia's suppliers are located in Australia and provide nationwide services under master services agreements or terms and conditions to our childcare centres and National Support Centres.

Our template request for tender and master services agreements contains contractual provisions reinforcing supplier commitments and reporting requirements in relation to actual or suspected modern slavery issues.

Our policies

Busy Bees has robust systems and controls in place to

address the risk of modern slavery taking place in the business.

We are committed to ensuring that there is no modern slavery in our supply chains or in any part of our business.

The Busy Bees Modern Slavery Global Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure modern slavery and human trafficking is not taking place anywhere in our supply chains. This policy sits alongside a framework of Busy Bees and Busy Bees Australia policies, which ensures our values are reflected in all our activities, including:

- Speak Up Policy – provides employees with a confidential mechanism to report concerns, with the training conducted for all employees in 2025.
- Code of Conduct – sets out our values and expectations of our people.
- Manage Recruitment and Onboarding – outlines mandatory pre-engagement checks that must be completed ahead of any individual or company being recruited or engaged by Busy Bees Australia which align with requirements under the Australian Education and Care Services National Regulations and the Australian Government's National Principles for Child Safe Organisations.

Each of Busy Bees and Busy Bees Australia's policies and training programs are accessible to all employees, at any time, through Busy Bees' online training platforms, which they receive training on upon their induction into the business.

34 of Busy Bees Australia's centres continue to be managed by a third-party manager under a management agreement which provides Busy Bees Australia with oversight and step-in rights with respect to the management of those centres.

Training

To ensure a high level of understanding of modern slavery risks in our supply chains and our business, all National Support Centre staff, State Managers, Area Directors and Centre Directors are required to complete mandatory Modern Day Slavery training within 21 days of commencement of their employment with the business. Mandatory refresher training is then provided every two calendar years throughout their employment. This refresher was most recently completed in the 2025 calendar year.



Further Steps

We will continue to periodically review the effectiveness of the steps we have taken to address the risk of modern slavery in our business and supply chains.

Busy Bees Australia's suppliers primarily fall into the following categories:

- Premises - including landlords, building services, repairs and maintenance;
- Staffing – including agency staffing and recruiting;
- Goods - including food supplies, uniforms, office supplies, equipment and consumables;
- Services - including cleaning, insurance, consulting and professional services; and
- Other – including utilities.

From the above list, we have identified that Busy Bees Australia's highest risks of modern slavery exposure in its supply chains exist in the areas of cleaning, staffing, and uniforms.

In identifying these risks, Busy Bees Australia considers a range of relevant factors, including the use of low-skilled and temporary labour, reliance on subcontracting arrangements, and sourcing from industries or jurisdictions with a higher prevalence of labour exploitation. These risks may arise both within our operations and across our supply chains, particularly in sectors such as cleaning services and textile manufacturing. These two areas will be our business' key focus areas for 2026, as outlined below.

In 2025, we:

- conducted a tender and selection process for a national building and maintenance contract for our business, which included specific enquiries about how tender participants address and manage modern slavery risks in their businesses and their own supply chains (and included a review of their modern slavery policies and procedures);
- reviewed the impact and operational changes that arise as a result of implementing modern slavery policies and procedures; and
- enhanced and refined governance and reporting requirements to ensure appropriate governance oversight is embedded into modern slavery policies and procedures within the supply chain.

Our focus in 2026 will be:

- establishing a cross-functional modern slavery committee comprising representatives of a number of functional areas in the business (including procurement, human resources and legal) to meet at least twice annually to review matters relating to modern slavery risks in our supply chains, with a reporting line to the Executive Leadership Team;
- undertaking due diligence on new and existing suppliers to ensure compliance with modern slavery laws and Busy Bees Australia's requirements;
- conducting a tender and selection process for a national cleaning contract to service our childcare centres and National Support Centres, with a particular focus on how tender participants address and manage modern slavery risks in their businesses and their own supply chains (including reviewing their modern slavery policies and procedures) given the high risk of forced labour in the cleaning industry; and
- conducting a tender and selection process for a national uniform supplier for our business, with a particular focus on how tender participants address and manage modern slavery risks in their business and their own supply chains (including reviewing their modern slavery policies and procedures) given the high risk of forced labour in the textile industry.

Consultation

Each entity owned or controlled by Busy Bees Australia is governed by the same management team and directors, with shared governance, policies, and procedures in respect of modern slavery risk, which also reflect the Busy Bees' group governance standards. As such, consultation is embedded within Busy Bees Australia's governance framework.

The Board of Busy Bees Australia Holding Pty Ltd approved this statement on 29 June 2026 in its own capacity and on behalf of the entities it owns or controls that are reporting entities under the *Modern Slavery Act 2018* (Cth).