

# Modern Slavery Statement FY24



This Modern Slavery Statement has not yet been approved by the Attorney-General's Department or published on the Online Register for Modern Slavery Statements.



Walking together. Learning together. Growing together.



Acknowledgement of country

G8 Education acknowledges the Traditional Owners of the lands on which we operate and pays our respect to Elders past and present.

We recognise that Aboriginal and Torres Strait Islander peoples have been nurturing and teaching children on these lands for thousands of years.

We are grateful for the opportunity to work, learn and grow connections together as a united community.



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## A MESSAGE FROM OUR CHIEF EXECUTIVE OFFICER

At G8 Education, we believe that every child deserves the best possible start in life. We are driven by our purpose in creating the foundations for learning for life, we live by our values of Dedication, Compassion, Passion, Integrity and Innovation to place the child at the heart of everything we do.

Now in our fifth Modern Slavery Statement, we reflect on the progress made in identifying, monitoring and managing modern slavery risks across our operations and supply chain during the 2024 financial year. We are pleased to report that we delivered on the initiatives planned for the Reporting Period. In addition, we successfully sourced and contracted our facilities management service and further strengthened our supplier oversight and due diligence processes.

Our focus throughout 2024 has been on embedding the policies, processes and controls introduced in previous years to ensure they are consistently applied and understood across the business. We commenced a review on our educational resources and furniture categories to further assess and address potential areas of risk.

We recognise that modern slavery is a complex and evolving global issue, and while we have made progress, we know there is more to do. This Statement outlines the actions we have taken and reaffirms our ongoing commitment to strengthening our approach to ethical sourcing and protecting human rights within our operations and broader network. We remain committed to continuous improvement in this area.

Yours sincerely



**Pejman Okhovat**  
CEO and Managing Director

Pejman Okhovat CEO and Managing Director



## 1. INTRODUCTION

### 1.1. Our Values

G8 Education Limited (ACN 123 828 553) (ASX:GEM) (**G8 Education**) is one of Australia's largest providers of early childhood education and care. With 400+ centres across a range of quality brands, we play an important role in the lives of Australian families.

Regardless of the brand or locality, we are united by our shared purpose, creating the foundations for learning for life and supporting children's lifelong learning and development through innovative and evidence-based teaching methods, while our learning environments are designed to engage and support children to discover, grow and learn. Each day, our dedicated team members nurture children's independent and curious minds, by creating inclusive, safe learning environments which meet children's individual needs.

Modern Slavery practices are antithetical to our purpose and mission as an organisation, and we are committed to ensuring that Modern Slavery does not exist within our operations or supply chain.

### 1.2. Our Statement

This is G8 Education's fifth Modern Slavery Statement (**Statement**).

This Statement, prepared pursuant to the *Modern Slavery Act 2018* (Cth) (**Act**), contains the activities undertaken by G8 Education to identify, assess and remediate risks of Modern Slavery in our business, operations and supply chain, and reflects on how we can continue to develop and strengthen our response to Modern Slavery over time.

Modern Slavery refers to any situation of exploitation where a person cannot refuse or leave work due to threats, violence, coercion, abuse of power or deception. It encompasses slavery and slavery-like practices, servitude, forced labour, debt bondage, human trafficking, deceptive recruiting for labour or services and the worst forms of child labour. The worst forms of child labour refers to the serious exploitation of children, including enslavement and exposure to dangerous work.

This Statement covers the activities of G8 Education, together with its wholly owned and controlled entities (**Reporting Entities**), for the financial year 1 January 2024 to 31 December 2024 (**Reporting Period**). This Statement describes practices that are common to the Reporting Entities, and references to 'our' and 'we' in this Statement are references to the Reporting Entities.

This Statement was approved by G8 Education's Board of Directors on 20 May 2025 and has been signed by CEO and Managing Director, Pejman Okhovat.

### 1.3. Key Achievements

During the Reporting Period, G8 Education:

- revised, developed, and strengthened our approach to building capacity in our business to monitor and manage Modern Slavery risks in our operations and supply chain. This included reviewing leading practice guidance and assessing how to continually evolve our practices and reporting;
- transitioned our grocery procurement and office supply consumables to new suppliers and, as part of this process, were able to ensure more robust governance around Modern Slavery and Environmental, Social and Governance (**ESG**) through our request for proposal (**RFP**) and contracting processes;
- launched our Reconciliation Action Plan (**RAP**) in February 2024 and have moved from the development to the embedment phase, continuing to support team to embed Aboriginal and Torres Strait Islander perspectives in our centres and support office operations;
- G8 Education's standard terms and conditions were updated such that compliance with the Supplier Code of Conduct is now an obligation on our suppliers, to enable G8 Education to reconsider supplier relationships where there has been non-compliance with the code; and
- sourced and contracted our facilities management service through a competitive procurement process. This engagement further strengthened our oversight of service categories and reinforced our approach to ethical sourcing and risk management.



## 2. OUR STRUCTURE, OPERATIONS AND SUPPLY CHAINS

### 2.1. Our Structure

G8 Education is a public company incorporated in Australia and listed on the Australian Securities Exchange (**ASX**). We own and operate childcare centres and provide early childhood education and care services in Australia, both directly and through wholly-owned subsidiaries controlled and managed by G8 Education. We are headquartered at the Gold Coast, Queensland, with our registered office at 159 Varsity Parade, Varsity Lakes, Queensland, 4017.

G8 Education is governed by its Board of Directors and Executive Leadership Team, which provide the management and strategic direction of the company and its subsidiaries.

Our subsidiaries operate under twenty-one different brands, being Bambinos, Creative Garden, Great Beginnings, Nurture One, World of Learning, Penguin Childcare, Headstart, Early Learning Services, Pelican Childcare, Kindy Patch Kids, Kinder Haven, First Grammar, Community Kids, Casa Bambini, Pelicans, Jellybeans, Greenwood, The Learning Sanctuary, Buggles, Kool Kids and Sandcastles.

For further detailed information on G8 Education's structure, please refer to pages 93-97 of our 2024 Annual Report.

### 2.2. Our Operations

As of 31 December 2024, G8 Education:

- operated more than 400 centres nationally (plus two support offices on the Gold Coast and in Brisbane);
- provided early education and childcare to over 41,000+ children in our centres each week; and
- directly employed over 10,000+ team members in a mix of permanent, part-time, temporary and casual roles.

Most of our workforce are employed in-centre as educators or teachers, and approximately 79% of our team are on permanent contracts (with the remainder on temporary or casual contracts). Where required, G8 Education engages temporary team members through agency roles.

### 2.3. Our Supply Chain

G8 Education partners with approximately 1,400 suppliers to help us provide quality early childhood education and care to our 400+ centres nationally. During the Reporting Period we spent approximately \$175 million with our direct suppliers, ranging from large multinational corporations to small local, community businesses.

Most of our direct suppliers are located in Australia.

During the Reporting Period, our largest procurement categories by spend were:

- property and facilities management (including commercial cleaners, gardeners and repair and maintenance workers);
- centre resources (including food, nappies and office supplies);
- education resources (including arts, crafts and teaching aids);
- furniture;
- marketing and professional services;
- technology services and devices (including software licences, IT services, laptops, iPads, mobile phones and printers); and
- people costs (including agency and casual recruitment and educational development).



### 3. RISKS OF MODERN SLAVERY

In preparing this Statement, G8 Education assessed the risk of causing, contributing to, or being directly linked to Modern Slavery practices within our operations and supply chain.

Modern Slavery risks, both within our own workforce and within our supply chain, is incorporated into our Risk Management Framework. Our Risk Management Framework is based on internationally accepted guidance (AS/NZS ISO 31000:2018 Risk Management – Principles and guidelines) for identifying, analysing, evaluating, treating, monitoring, and reporting risks across the business.

#### 3.1. Risks in Operations

The Modern Slavery risks within our operations are primarily related to employment of our workforce, including our centre-based team members, support office team and agency workers.

Modern Slavery risks stemming from our workforce are considered as part of labour risks more broadly, being risks that might arise from failure to follow correct recruitment practices and breach of regulations and internal policies. Risks associated with these activities are captured in our enterprise risk register.

There may be risks of Modern Slavery in informal settings within our organisation; for example, if team members were to utilise associates who are not employed by G8 Education to work at our centres without G8 Education's knowledge. We consider this risk to be very remote, due to our team members operating in environments with established policies and processes and oversight from our support office teams.

#### 3.2. Risks in Supply Chain

We have previously analysed our supplier base to gain a deeper understanding of their operations and to better understand the inherent risks of Modern Slavery. Through this process, we identified the following procurement categories which represent the highest levels of inherent risk for Modern Slavery practices:

Supplier	Industries	Modern Slavery risks/indicators
Services	Property and facilities management (including cleaning, trades and maintenance, gardening/landscaping, facility management services, security)	<ul style="list-style-type: none"> <li>• Forced/bonded labour</li> <li>• Excessive working hours</li> <li>• Underpayment of wages</li> <li>• Exploitation of migrant workers</li> </ul>
	Food supplies	<ul style="list-style-type: none"> <li>• Forced/bonded labour</li> <li>• Excessive working hours</li> <li>• Underpayment of wages</li> <li>• Exploitation of migrant workers</li> <li>• High-risk geographies</li> </ul>
Products	Centre and Education resources (for example, nappies)	<ul style="list-style-type: none"> <li>• Forced/bonded labour</li> <li>• Excessive working hours</li> <li>• Underpayment of wages</li> <li>• Exploitation of migrant workers</li> <li>• High-risk geographies</li> </ul>
	Uniforms	<ul style="list-style-type: none"> <li>• Forced/bonded labour</li> <li>• Excessive working hours</li> <li>• Underpayment of wages</li> <li>• Exploitation of migrant workers</li> <li>• High-risk geographies</li> </ul>
	Technology devices (laptops, iPads, mobile phones, printers)	<ul style="list-style-type: none"> <li>• Forced/bonded labour</li> <li>• Excessive working hours</li> <li>• Underpayment of wages</li> <li>• Exploitation of migrant workers</li> <li>• High-risk geographies</li> </ul>



## Property and facilities management services

G8 Education engages commercial cleaners, gardeners and repair and maintenance workers to support its operations. While most supplier engagements are managed centrally by G8 Education's support office, the dispersed nature of our property portfolio means some local procurement occurs at a centre level.

In the Reporting Period cleaning services were decentralised, with regularly weekly cleaning now managed locally by our individual centres. We acknowledge that this change has increased our risk profile associated with our cleaning suppliers, especially given the sector's known vulnerabilities. The cleaning workforce is often comprised of low-skilled and migrant workers who may have limited understanding of their legal rights, lower English language proficiency and may be engaged under sub-contracting arrangements that reduce transparency and oversight.

In response we have taken steps to mitigate these risks. Modern Slavery Declarations are required as part of the onboarding process for new suppliers, ensuring that suppliers are aware of our expectations and are aligned with our Supplier Code of Conduct. In addition, we have retained central oversight of annual deep cleans, which are managed through a centralised process with pre-approved suppliers.

We remain alert to the elevated risks in this category and are committed to improving visibility and accountability through a combination of procurement controls, supplier engagement and ongoing monitoring.

## Food

We source the vast majority of our packaged food and fresh food ingredients from major Australian supermarket chains and other large foodservice wholesalers.

We are aware of the supply chain risks in the production, processing, packaging and transport of food and fresh produce, including those stemming from the prevalent use of labour hire contractors. Such Modern Slavery risks include passport retention and poor working conditions, among other factors. We acknowledge a particular risk in the quantity of raw fruit and vegetables bought for consumption in our centres, including where our centres acquire this food from smaller providers.

We also acknowledge an elevated risk in other parts of the food supply chain, especially for some types of packaged foods that are sourced offshore.

Due to the procurement of most of our food from major supermarket chains and large foodservice wholesalers, transportation of food is relatively reduced, in turn reducing our Modern Slavery risks associated with transport services. We also note that because much of the food procured for our centres is raw and wholesale, Modern Slavery risks associated with packaging services are reduced.

## Centre and education resources

We are alert to the risks of Modern Slavery that arise from the complex multinational supply chains for goods such as nappies, wipes, educational resources, and other centre equipment. We are particularly alert to the Modern Slavery risks within the supply chains for electronic goods.

## Uniforms

We are alert to the risks of Modern Slavery that arise from the supply of uniforms for staff and are aware that textiles and clothing is a high-risk sector with known Modern Slavery risks.





## 4. ACTIONS TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

### 4.1. Our Operations

We believe that the risk of G8 Education causing Modern Slavery in our directly employed workforce is low. This is due to the highly regulated nature of Australian employment laws, the application of the modern awards system to most of our team members, the strict regulation of the early education and care sector and our team members undertaking work in environments where there are established policies and processes.

We are committed to ensuring that our employees are paid in line with legislative requirements (in addition, in 2024 G8 Education was involved in collective bargaining resulting in our nation's first Multi-Employer Agreement and a Federal Government funded 15% award rate pay increase for early childhood education and care workers over a two-year period) and have invested in a human resources information system, Dimensions, to ensure compliance with applicable awards. Dimensions is updated through approval matrices and produces auditable change records, ensuring that our employment practices are transparent and free from undue influence. This system provides protection from inadvertent wage non-compliance and strengthens our hiring practices.

As part of our recruitment process, we undertake extensive pre-employment checks for prospective employees, including to ensure those we recruit are of legal working age and are choosing to work of their own free will.

The checks we conduct on prospective employees include:

- submission of valid working right credentials, which are cross-checked through immigration services for verification purposes (including sighting passport/visa);
- proof of address check to confirm residency;
- working with children checks and, for identified roles, national police checks;
- employment verification;
- qualification verification; and
- resume assessment.

To ensure adherence to Award and legislative requirements are proactively managed, we have implemented a People Support Team to guide leaders in 'doing the right thing'. The team has developed a suite of people-centric People Policies and Procedures to ensure our team members understand what is and isn't acceptable practice in the workplace, thereby managing and mitigating situations where Modern Slavery could arise.

Furthermore, the People Services Team complete periodic checks to proactively assess and manage regulatory and personnel changes and compliance with G8 Education policies and practices, including, but not limited to:

- quarterly working rights reviews and audits to verify changes or visa expirations;
- reviews of progression and Award classification changes to ensure fair and compliant wage control; and
- transparent and multi-level approvals of employment changes to promote equality and accountability in decision making processes.





## 4.2. Our Supply Chain

### Supplier selection process

Any G8 Education employee engaging a supplier is required to conduct an initial assessment of the risks associated with their engagement, including, but not limited to, the location of the supplier and their business operations and the type of goods or services being supplied.

Our Procurement Policy, implemented in the Reporting Period, requires all G8 Education employees to undertake procurement activities in accordance with relevant laws and regulations; in an ethical, equitable and transparent manner; with the effective management of supplier risk; consideration of value for money; and ensuring appropriate approvals are received before committing to purchase goods or services. In addition, in 2024 G8 Education became a member of Supply Nation, reinforcing its commitment to promoting greater economic empowerment for Aboriginal and Torres Strait Islander peoples and communities and working towards Closing the Gap.

The implementation during the Reporting Period of our procure-to-pay platform, Coupa, has reduced our Modern Slavery risk by improving visibility, consistency and transparency during the supplier onboarding process and implementing further controls over supplier engagement. At onboarding, the platform captures all relevant new supplier details (including checks of ABN, insurances and working with children checks), assigns purchase orders to requested spends and facilitates appropriate internal approval of these spends in accordance with the G8 Education Delegation of Authority Manual. The platform has also improved internal spending controls, with 93% of invoices having purchase orders raised prior to incurring spend and 54% of purchases being catalogue items. Ensuring our spend is focused on catalogue spending promotes greater control of the items being purchased and the suppliers these items are purchased from, being qualified suppliers who have met G8 Education's expectations regarding anti-slavery and other similar requirements.

G8 Education's new Supplier Portal, implemented in the Reporting Period and located on our website, provides access for new and existing suppliers to relevant forms and other resources, access to Coupa and G8 standard terms and conditions and copies of our Supplier Code of Conduct and Whistleblower Policy setting out our expectations of all our suppliers.

We are aware of the correlation between downward pressure on prices for services and goods and the increased risk of human rights violations and Modern Slavery within the supply chains for those services and goods. Because of this correlation, we do not select providers of services or goods solely based on price, but select suppliers based on various criteria including trade references and a review of policies and practices related to Modern Slavery risks. For example, as noted above, we source most of our packaged food and fresh food ingredients from major Australian supermarket chains, which we know to have robust anti-Modern Slavery policies and controls in place.

As well as assessment of supplier policies and controls, we also conduct site visits prior to engagement of many of our large, key suppliers. These site visits focus on identifying any areas of concern regarding quality, safety and any indicators of Modern Slavery. We acknowledge there is an increased risk of Modern Slavery Practices associated with suppliers in which we do not conduct site visits, particularly smaller suppliers.

We have previously improved our Request for Proposal (RFP) process to capture information from prospective suppliers about their Modern Slavery policies and controls for assessment prior to engagement. The management by suppliers of environmental, social, and governance factors, including human rights considerations, form part of our RFP evaluation process.

### Supplier contracting controls

We have a robust contract approval process in place, pursuant to which all commercial agreements must be in writing and reviewed and approved by G8 Education's Legal team, irrespective of the quantum or term.

In the Reporting Period, we focused on requiring contracts with suppliers (new, renewed or varied) to be entered into on our standard terms and conditions (with negotiated amendments where required) to ensure our robust anti-slavery, anti-bribery and anti-corruption standard contract terms are included in contracts wherever possible. We also created a Supplier Code of Conduct (more details below at section 5). The Supplier Code of Conduct has been incorporated into all G8 Education standard contract templates for provision of goods and services and purchase order terms and conditions, to ensure our suppliers agree to adopt this code in the majority of new supplier engagements.

Our anti-slavery standard contract terms include:

- warranties from suppliers regarding compliance with all applicable laws, statutes and regulations in relating to Modern Slavery (including the Act);
- warranties that neither suppliers, nor their associates, have been convicted of any offence involving Modern Slavery;
- requirements that suppliers take reasonable steps to ensure that there is no Modern Slavery in the supplier's or their subcontractors' supply chains or in any part of their businesses, including by implementing appropriate due diligence; and
- requirements that suppliers respond promptly and accurately to all due diligence questions and requests for information issued to it by G8 Education from time to time.

In our standard contract terms and purchase order terms and conditions, we also diligently pursue terms that require a prohibition on sub-contracting other than as agreed by G8 Education, and which require legal and regulatory compliance provisions.

We also endeavour to include in all commercial agreements, particularly technology services agreements, a requirement that no offshore services are utilised without our prior written approval.

Approval of all commercial agreements must be obtained in accordance with the Board approved delegation of authority and must be signed by both a Director and the Company Secretary unless a contract signing delegation has been approved. The relevant approvals for financial spend vary depending on whether there is a central contract in place and whether the spend is budgeted.

We have also improved our internal contract approval process by incorporating into our contract sign off forms a requirement for all personnel reviewing or approving contracts to consider, prior to final approval, whether our standard anti-slavery clauses have been appropriately incorporated into each supplier contract.

Additionally, we require suppliers that undertake work in our centres during business hours to undergo a Working with Children Check, to ensure that supplier personnel hold, where relevant, a clearance to work with children.

Despite our controls outlined above, we are aware there is a risk that contracts will be entered into outside of these processes, including contracts which are not reviewed by the G8 Education Legal team or approved in accordance with the Delegation of Authority Manual or not entered into on G8 Education's standard terms and conditions (where that may have been possible in the circumstances).

### **Supplier monitoring and management**

Many of our suppliers are located in or have an operational base in Australia and are required to comply with the Act within their own supply chains. As such, we expect all our suppliers to make their own commitments to address Modern Slavery risks in their operations and supply chains. We are committed to monitoring the progress of our suppliers in managing those risks and continually engaging with our suppliers in understanding their Modern Slavery processes and controls.

Currently, the relevant business owner within G8 Education is responsible for the day-to-day management and monitoring of our suppliers. This includes regular supplier account meetings and site visits, in addition to monitoring service level performance. For example, during the Reporting Period, we focused on conducting reviews of the supply chains of our key suppliers of office supply consumables, involving conducting site visits where possible.

Due to internal resource capacity, our assessment of supplier Modern Slavery policies and controls is focussed on suppliers that represent the majority of spend within the various procurement categories. We are aware that this creates risk in relation to possible Modern Slavery practices within smaller suppliers.

During the Reporting Period, G8 Education also in-housed our call centre operations, transferring our operations from an external supplier to internal employees and processes, now referred to as our Family Support Team. This team consists of employees who are Australian based.



## 5. GOVERNING POLICIES AND STRATEGIES

As a leading provider of early childhood education and care services listed on the ASX, we operate in an environment of robust regulatory oversight under the Education and Care Services National Law and the National Quality Standard. We also comply with the ASX Corporate Governance Council's Corporate Governance Principles and Recommendations (4th Edition) and the ASX Listing Rules and the *Corporations Act 2001 (Cth)*.

Within this regulatory framework, we have established a set of policies and procedures that govern our operations. The policies and procedures relevant to how we manage potential Modern Slavery-related issues regarding our employees, supply chain and business operations include but are not limited to the following:

- Child Protection Policy;
- Child Protection Statement of Commitment;
- Code of Conduct;
- Diversity, Inclusion and Belonging Policy;
- Fraud Policy;
- Managing Team Member Grievances and Disputes Procedure;
- Procurement Policy;
- Risk Management Policy;
- Risk Management Framework;
- Supplier Code of Conduct;
- Sustainability Policy; and
- Whistleblower Policy.

These policies and procedures are available on the G8 Education intranet and webpage and are re-enforced through internal and external communications as well as training modules.

Our Procurement Policy is discussed at section 4.2 of this Statement.

Our Supplier Code of Conduct clarifies out our expectations of our Suppliers in relation to ESG related issues by setting out Minimum Requirements, including that:

- suppliers comply with all relevant laws and regulations with G8 Education's ESG expectations as set out in the Code;
- provide a true and accurate account of their operations and supply chain when responding to requests for information from G8 Education;
- promptly advise G8 Education of any non-compliance with this Code; and
- have processes in place that allow for workers to report non-compliance with the Code anonymously and free of retribution or other unfavourable treatment.

The Code provides that if a supplier is unable to demonstrate compliance with the Code or fails to meet Minimum Requirements, G8 reserves the right to pursue appropriate action, including remediation or termination of the business relationship with the supplier. In 2024, G8's standard terms and conditions have been updated such that compliance with this Code is a contractual obligation for our suppliers.

### Grievance mechanisms

While we endeavour to ensure that no incidents of Modern Slavery arise in our operations or supply chain, we appreciate that Modern Slavery risks cannot be fully eliminated. Considering this, we have grievance mechanisms and incident management processes in place so that we can appropriately respond to potential incidents of Modern Slavery if they occur.

Team members are encouraged to raise grievances through the Managing Team Member Grievances and Disputes Procedure. Parents are encouraged to raise concerns, make complaints or provide compliments by:

- speaking in-person with their centre manager, responsible person, or child's educator;
- phoning the dedicated Family Support Team; and/or
- emailing our centres or Family Support Team.

For key suppliers, there is generally an escalation process in the contract terms and conditions where grievances can be formally communicated by suppliers and their employees.

## Whistleblower program

We believe that whistleblowers play an important role in detecting misconduct and identifying, escalating and addressing potential issues while promoting a culture of openness, honesty, and transparency. We are committed to conducting our business in accordance with the law and good business practice and recognise that our reputation is an essential element of our success.

In drafting our Supplier Code of Conduct, we ensured that one of the Minimum Requirements that we require of suppliers is that they have processes in place that allow for workers to report non-compliance with the Code anonymously and free of retribution or other unfavourable treatment.

G8 Education's Whistleblower Policy can be found in the corporate governance section of our website: [www.g8education.edu.au/investor-information/corporate-governance](http://www.g8education.edu.au/investor-information/corporate-governance).

There were no whistleblower complaints in the Reporting Period related to Modern Slavery matters.

## Education strategies

In our 2024 financial year reporting period, we implemented an education strategy based upon the key pillars of being evidence based, meeting the diverse and inclusive needs of the children, families, and team, reflective of children as competent and capable learners, inclusive of the Sustainable Development Goals (SDGs), based upon innovative and transformative approaches where wellbeing and respectful relationships are prioritised. In the Reporting Period, we continued to focus on the development of our organisational RAP and the ongoing support of teams to embed Aboriginal and Torres Strait Islander perspectives in their daily practice. Innovative and transformative approaches to supporting the appropriate use of digital technologies and child self-regulation development strategies remained key differentiators during the Reporting Period.

## 6. REMEDIATION

There have been no instances of Modern Slavery reported or identified in the Reporting Period, and as such, no examples of remediation.

We have processes in place to investigate potential incidents of Modern Slavery if discovered, either in our own operations or in our supply chain. How the incident is managed and remediated will vary depending on the situation.

## 7. MEASURING EFFECTIVENESS

As indicated above, the Modern Slavery risks stemming from our direct workforce as well as those originating in our supply chain have been designated as part of functional area risks (labour risk and procurement/supply chain risks, respectively). These risks are reviewed in accordance with the provisions of our Risk Management Framework.

More broadly, we monitor and assess risks through feedback from internal and external stakeholders, regulators, industry bodies, and our supply chain partners.

As noted in this Statement, we have a complex supply chain, which presents challenges in monitoring suppliers, particularly smaller suppliers, across all of our centres. We consider measuring effectiveness to be an area for development for our business.

## 8. CONSULTATION WITH OUR SUBSIDIARIES

G8 Education operates through wholly owned subsidiaries which are under the governance of the G8 Education Board and operate in accordance with G8 Education's policies, procedures, and controls. We engaged in internal stakeholder interviews throughout development of this Statement to ensure it reflects the operations and supply chains of all Reporting Entities. As such, no separate consultation was undertaken when preparing this Statement.



## 9. OTHER INFORMATION

### 9.1. Future Plans

In the 2025 financial year, G8 Education will continue to strengthen our approach to identifying, assessing and managing Modern Slavery risks across our operations and supply chain. Our focus remains on embedding effective systems, enhancing internal capability and refining our practices in line with the evolving expectations of our stakeholders. Planned initiatives for the coming year include:

- developing a holistic contract management framework to improve visibility of supplier obligations, enhance oversight, and support consistent application of ethical sourcing principles;
- enhanced supplier due diligence processes to better identify and manage Modern Slavery risks; and
- targeting Modern Slavery training for our procurement professionals to deepen understanding of modern slavery risk indicators, supplier engagement and escalation pathways.

These initiatives form part of our broader commitment to continuous improvement and fostering responsible business practices across our value chain.

## 10. APPROVAL

This statement was approved by the Board of G8 Education Limited in their capacity as principal governing body of G8 Education Limited on 20 May 2025.

This statement has been signed by the Chief Executive Officer and Managing Director, Pejman Okhovat, on 30 June 2025.



**Pejman Okhovat**  
CEO and Managing Director

30 June 2025





G8 Education<sup>ltd</sup>

G8 Education Limited | [g8education.edu.au](http://g8education.edu.au)

