



# Modern Slavery Statement

Camp Australia Pty Ltd (ACN 060 703 120)

July 2023 - 30 June 2024

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## 1. Introduction

This statement is prepared in accordance with the Modern Slavery Act 2018 (Cth) (the Act) for the reporting period from 1 July 2023 to 30 June 2024.

CA Group Holdco Pty Ltd (ACN 95 663 533 195), as the reporting entity, submits this joint statement on behalf of the Camp Australia group.

The entities covered by this statement include.

CA Group Bidco Pty Ltd (ACN 44 663 534 101)

Spyder (BC) Holdco Pty Ltd (ACN 29 616 379 143)

Spyder (BC) Midco Pty Ltd (ACN 616 379 867)

Spyder (BC) Bidco Pty Ltd (ACN 616 297 904)

Camp Australia Pty Ltd (ACN 060 703 120)

Camp Australia Services Pty Ltd (ACN 158 075 837)

The Camp Australia Foundation Ltd (ACN 153 730 940)

Camp Australia Holdings Pty Ltd (ACN 160 199 306)

CAIP Pty Ltd (ACN 147 444 399)

## 2. Our Business and Supply Chains

### 2.1. Structure

Camp Australia is a prominent provider of Outside School Hours Care (OSHC) and Holiday Care services in Australia. With over three decades of experience, the organisation operated a national portfolio of 514 services as at 30 June 2024.

### 2.2. Operations

Camp Australia's head office is located in Melbourne, Australia. At 30 June 2024, the organisation employed approximately 176 head office staff and around 3,500 employees across its national service network.

The organisation delivers Before and After School Care and Holiday Care programs for children of school and pre-school age.

Camp Australia's vision, "To support all families in achieving their dreams," underpins its role in enabling working families, carers, and individuals undertaking study or requiring additional support with childcare.

Within school communities, Camp Australia enhances the value proposition of schools by providing OSHC services, investing in facilities, and delivering high-quality staffing and resources. Staff training includes specialised areas such as autism support, additional needs, resilience, mindfulness, and positive psychology, supporting inclusive participation for all children.

Engagement with stakeholders is grounded in the principles of “Relationships Matter” and “Community Focused”. Feedback channels are actively used to gather insights from families, schools, and communities to inform service improvements.

The organisation also promotes a culture of transparency and ethical conduct within its workforce. Key satisfaction indicators across parents, principals, and employees continued to show positive trends during the reporting period.

### **2.3. Supply Chain**

Camp Australia’s supply chain supports the delivery of its services and includes procurement of food, educational materials, technology, and operational infrastructure.

The OSHC sector is generally regarded as low risk for modern slavery. Camp Australia operates exclusively within Australia, which has a comparatively low prevalence of modern slavery and a strong regulatory framework.

The organisation’s primary expenditure relates to employee remuneration. Remaining expenditure is largely directed towards technology systems, facilities, and service delivery support.

Direct suppliers are predominantly based in Australia and the Philippines. While Australia presents a low-risk environment, some suppliers may source goods internationally, including from higher-risk jurisdictions. The Philippines-based provider is considered low risk due to Australian ownership and alignment with anti-modern slavery and trafficking frameworks.

## **3. Risks of Modern Slavery**

Camp Australia has undertaken an assessment of its operations and supply chains to identify areas where modern slavery risks may arise.

### **3.1. Operations**

- Camp Australia employs a large number of educators across its services, some of whom may be more vulnerable or have limited awareness of their rights. These employees are protected under the Children’s Services Award 2010 and the Education and Care Services National Law Act, which mitigates these risks.
- The organisation engages a managed operations provider in the Philippines, supporting its Global Support Centre with approximately 139 employees.

### **3.2. Supply Chain**

- Major suppliers are generally subject to the Act due to their size and scale.
- Certain goods procured by Camp Australia may originate from countries with a higher prevalence of modern slavery. These include items such as uniforms, technology equipment, and program materials, particularly where manufacturing occurs in regions such as China.

## 4. Actions Taken to Address Modern Slavery Risks

### 4.1. Workforce

Camp Australia assessed its workforce and identified the following controls and mitigations:

- All operations are based in Australia, a low-risk jurisdiction
- Policies supporting ethical conduct are in place, including a Whistleblower Policy
- Employees have access to an Employee Assistance Program (EAP), offering confidential counselling and legal support
- The People & Culture team provides multiple support channels, including a hotline and structured onboarding processes
- A Health, Safety and Wellbeing Officer role continues to support workforce wellbeing
- Service-based employees are governed by the Children's Services Award 2010
- The Global Support Centre includes approximately 123 employees through a managed provider.

Based on this assessment, the risk of modern slavery within the workforce is considered low.

### 4.2. Global Support Centre

Assessment of the Global Support Centre indicates:

- The provider is Australian-owned and employs approximately 4,000 staff
- It has partnered with Camp Australia since 2015
- It maintains an Anti-Modern Slavery and Trafficking in Persons Policy
- Contractual arrangements include obligations aligned to the Act.

The risk within this workforce remains low.

### 4.3. Supply Chain

Camp Australia's primary supplier continues to undertake modern slavery risk assessments and has reported a low level of risk.

While visibility over smaller suppliers is more limited, the scale and nature of procurement suggest that overall supply chain risk remains low.

### 4.4. Audit & Risk Committee

The Audit & Risk Committee supports the Board in overseeing governance, risk management, and compliance.

The Committee meets quarterly to review key risks, including modern slavery. Current assessments indicate a low level of risk. This is monitored on an ongoing basis, with mitigation strategies developed if risk levels change.

## 5. Effectiveness of Actions

While no instances of modern slavery have been identified within operations or supply chains, the actions undertaken have:

- Improved visibility of potential risk areas
- Strengthened awareness of modern slavery risks among relevant stakeholders.

## 6. Consultation

This statement has been developed in consultation with members of the Executive Leadership Team. Directors have also been involved in the review and approval process.

This modern slavery statement was approved by the principal governing body of Camp Australia Pty Ltd as defined in the Modern Slavery Act 2018 (Cth) (“the Act”) on 23 December 2024.

This modern slavery statement is signed by a responsible member of Camp Australia Pty Ltd as defined in the Act.

A handwritten signature in black ink, appearing to read 'I. Merkin', with a horizontal line extending from the end of the signature.

**Igor Merkin**

Chief Financial Officer  
Camp Australia Pty Ltd