



# Modern Slavery Statement

Camp Australia Pty Ltd (ACN 060 703 120)

July 2022 - 30 June 2023

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## 1. Introduction

This statement is prepared in accordance with the Modern Slavery Act 2018 (Cth) (the Act) and relates to the reporting period from 1 July 2022 to 30 June 2023.

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

Entities within the reporting group 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 leading provider of Outside School Hours Care (OSHC) and Holiday Care services across Australia, with more than 30 years of operational experience and a national footprint of 507 services as at 30 June 2023.

### 2.2. Operations

Camp Australia is headquartered in Melbourne, Australia. As at 30 June 2023, the organisation employed approximately 176 employees at head office and around 3,500 employees nationally across service locations.

The organisation delivers Before and After School Care, as well as Holiday Care programs, supporting both school-aged and pre-school aged children.

Camp Australia's vision is "To support all families in achieving their dreams." This is reflected in the organisation's role in supporting working families, carers, and those engaged in study or requiring additional support in caring for children.

For school communities, Camp Australia contributes value by enhancing the overall school offering through OSHC services, investing in facilities, providing additional resources, and maintaining a highly trained workforce. This includes targeted training in areas such as autism support, additional needs, resilience, positive psychology, and mindfulness, enabling inclusive participation for all children.

Engagement with stakeholders is guided by the principles of “Relationships Matter” and “Community Focused”. Feedback mechanisms are in place for parents, schools, and communities to inform continuous improvement.

Within the workforce, Camp Australia promotes a culture of open communication, ethical conduct, and transparency. Internal satisfaction metrics across parents, principals, and employees have shown continued improvement over the reporting period.

### **2.3. Supply Chain**

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

The OSHC sector is generally considered to present a relatively low risk of 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 largest area of expenditure relates to employee remuneration. Beyond this, procurement is focused on technology systems, facilities, and service delivery support.

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

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

Following a review of operations and supply chains, Camp Australia has identified several areas where modern slavery risks may arise.

### **3.1. Operations**

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

### **3.2. Supply Chain**

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

### **3.3. Impacts of Covid-19 Pandemic**

- Reliance on agency staff increased during the pandemic, which may elevate risk due to reduced visibility over employment conditions.

- Disruptions to global supply chains created pressures on suppliers, including cost reduction measures and rapid scaling, which may increase modern slavery risks where due diligence processes are less robust.

## **4. Actions Taken to Address Modern Slavery Risks**

### **4.1. Workforce**

Camp Australia assessed potential modern slavery risks within its workforce and noted:

- All operations are based in Australia, a low-risk jurisdiction
- Policies are in place to support ethical conduct, including a Whistleblower Policy
- Employees have access to an Employee Assistance Program (EAP), offering confidential counselling and legal support
- The People & Culture function provides multiple support channels, including a hotline and structured onboarding processes
- A Health, Safety and Wellbeing Officer role was established to further strengthen workforce protections
- 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 these factors, the risk of modern slavery within the workforce is considered low.

### **4.2. Global Support Centre**

Assessment of the Global Support Centre identified that:

- The provider is Australian-owned and well-established, employing approximately 4,000 staff
- It has supported Camp Australia since 2015
- It maintains its own Anti-Modern Slavery and Trafficking in Persons Policy
- Contractual agreements include obligations relating to the Act.

The risk within this workforce is assessed as low.

### **4.3. Supply Chain**

Camp Australia’s primary supplier has undertaken modern slavery risk assessments since 2017 and reports a low level of risk.

While visibility over smaller suppliers is more limited, the scale and nature of procurement activities 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 business risks, including modern slavery. Current assessments indicate a low level of risk, which continues to be monitored. Where risk levels change, appropriate mitigation strategies are developed.

## 5. Effectiveness of Actions

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

- Strengthened visibility and understanding of potential risk areas
- Increased awareness of modern slavery risks among key personnel.

## 6. Consultation

This Statement has been prepared in consultation with members of the Executive Leadership Team. Directors have also contributed to 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 22 December 2023.

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



**Igor Merkin**

Chief Financial Officer  
Camp Australia Pty Ltd