



Affinity Education
Group

Modern Slavery Statement

What is Modern Slavery?

The *Modern Slavery Act 2018* (Cth) (**Act**) came into effect on 1 January 2019. The Act requires organisations based or operating in Australia with an annual consolidated revenue of \$100 million or more, to report annually on the actions they are taking to avoid or eliminate Modern Slavery in their operations and supply chains.

The Australian Government describes Modern Slavery as circumstances where offenders use coercion, threats or deception to exploit victims and undermine their freedom. Modern Slavery can occur in every industry and presents itself in many ways including human trafficking, slavery and forced labour.

Modern Slavery distorts global markets, promotes cost cutting techniques and poses significant legal and reputational risks to entities. Affinity Education Group Pty Limited (**Affinity**) is dedicated to ensuring we are limiting our impact as much as possible and working with our suppliers to ensure that our supply chain is ethically and responsibly sourced.

What does this mean to us?

Being aware of Modern Slavery means utilising the best quality and ethically sourced resources and services to ensure that we are not contributing to an issue of global harm. This Modern Slavery Statement outlines the steps Affinity has taken to identify, manage and mitigate specific risks of Modern Slavery within our operations and supply chain.

Affinity strongly supports governmental mechanisms aimed at addressing violations of human rights. This Statement outlines Affinity's operations and supply chains, modern slavery risks, actions taken by Affinity to date, the effectiveness of those actions and the approach taken during our first reporting period.

These values demonstrate Affinity's commitment to eliminating modern slavery practices and describe how activities have and will be undertaken to mitigate risks of those practices in supply chains. Affinity has prided itself as being a leader developing high quality mounting systems and is committed to supporting the Act.

This Statement sets out the current state of operations and identifies areas of improvement. This Statement is backed by Affinity's steadfast commitment to consistent and continuous improvement, and a willingness to recognise the risks in our current state and to undertake the necessary actions to minimise and mitigate those risks.

Operations

Affinity is a proprietary company based in Queensland. We currently own and operate more than 250 childcare centres across Australia. We provide childcare services to over 23,000 children and employ over 6,200 team members.

Affinity promotes the following operational activities in support of its business objectives:

- delivering quality care and education to children within our centres;
- directly sourcing our employees;
- providing educational pathways for development to our educators; and
- developing childcare centres that are ethically built and compliant with legislation.

Supply Chain

Affinity Education Group's supply chains include various services which assist with the delivery of childcare services to our centres as well as suppliers who work with us ensure that the centres are compliant and managed appropriately. Affinity seeks to engage with suppliers who prefer and prioritise products sourced ethically and from Australia.

These include:

- food, merchandise uniform suppliers;
- professional service providers such as auditors, brokers, debt collectors and lawyers;
- contractors including building works, cleaners, IT, marketing services and HR services;
- resources including play equipment, educational resources, and furniture; and
- educational program suppliers including excursion and incursion providers, language lessons, music classes, maths and English programs.

All of Affinity's key supply arrangements are governed by negotiated written agreements that are reviewed by Affinity's legal counsel to ensure appropriate modern slavery provisions are implemented within Affinity's contracts.

Affinity Education Group will:

- report on its actions to assess and address Modern Slavery risks associated with its operations, including its employment practices and providing training for workers;
- discuss steps it has taken to assess and address Modern Slavery risks associated with the activities of Affinity; and
- provide information on how it is assessing and addressing Modern Slavery risks in its supply chains.

Risk of Modern Slavery Statements

Affinity recognises that there may be risks attributable to its current supply chain arising from the operations of its contractors or their sub-contractors. This may include risks that contractors are not using ethically sourced material or supplies, providing inadequate training or conducting insufficient enquiries into labour being utilised to ensure that Modern Slavery does not take place within their operational structures and risks relating to expedited time frames for completing various projects.

Affinity continues to adopt a risk-based approach to modern slavery focused on material or 'high risk' suppliers with a key indicator being the location of manufacturing within their supply chain.

Action and Due Diligence

Affinity has been working to address these risks by undertaking due diligence on its current suppliers and new suppliers in order to continuously implement practices to support the principles of Modern Slavery.

Affinity recognises that without sufficient due diligence on its contractors and suppliers, its contribution to Modern Slavery will increase. These risks are mitigated by the implementation of supplier onboarding procedures (including dispute mechanism processes) to ensure they meet the legislative requirements to be working within Affinity Education Group's centres.

In line with Affinity's risk based approach, Affinity carries out the following procedures when onboarding new suppliers:

- request information from direct suppliers about its sub-suppliers;
- having open and honest conversations with its key suppliers to ensure that they are addressing their own Modern Slavery risks;
- updating supplier agreements to address Modern Slavery risks and obligations;
- completing Modern Slavery supplier questionnaire which identifies any modern slavery risks with the supplier; and
- completing annual reviews on its policies relating to suppliers;
- using existing traceability processes to improve information about the source of products.

Affinity continually reviews its internal policies including its Whistleblower Policy to enable its employees and contractors to speak up and notify it of any issues that may be occurring or contributing to Modern Slavery.

Assessing Effectiveness

Affinity continually strives to ensure that it is managing Modern Slavery risks within its organisation. In order to assess the effectiveness of strategies to reduce and eliminate any risks relating to Modern slavery, Affinity will:

- include Modern Slavery discussions in our Safety Committee Meeting agenda. This meeting is attended by senior management and considers emerging or existing risks within the organisation and how to best address these risks. This includes tracking and providing updates on any projects undertaken by the broader business to prevent Modern Slavery risks;
- complete annual reviews of all policies and procedures with relevant internal departments to ensure policies and procedures accurately reflect the business's objectives. This includes reviewing the risk assessment procedures within Affinity's operations and those provided by suppliers;
- Modern Slavery Risks (if any) are reported annually to Affinity's executive management team and Board;
- promote training and education among staff to ensure they are aware of their obligations to uphold applicable laws, regulations, codes and standards which is included in our critical policies module so all employees are made aware; and
- Commence continued review of key suppliers assessed as having an elevated risk of human rights violations.

During the reporting period Affinity took further steps to assess and mitigate modern slavery risks within its operations which included updating Affinity's standard service and supply agreement templates which contain comprehensive modern slavery provisions.

Brands and Trading Names

This joint Modern Slavery Statement covers the activities of Affinity together with the entities it controls¹. Each entity owned or controlled by Affinity is governed by the same management team and directors, with shared governance, policies, and procedures in respect of modern slavery. As such, consultation is integrated within the entire Affinity group.

It also applies to all childcare centres owned and operated by Affinity under the following brands:



This statement was approved by the Board of Affinity on 24 June 2025.

Timothy Hickey

A handwritten signature in black ink, appearing to read 'Timothy Hickey', is positioned below the printed name.

Director and Board Member

24 June 2025

¹ This Modern Slavery Statement covers:

1. BHL Childcare Ltd
2. All Kids Childcare Services Pty Ltd
3. NTL Investments Pty Ltd
4. Bambini Early Childhood Development Brisbane Pty Ltd
5. Bambini Early Childhood Development Southport Pty Ltd
6. Bambini Early Childhood Development Peregian Pty Ltd
7. Bambini Early Childhood Development Gold Coast 2 Pty Ltd
8. Bambini Early Childhood Development Meridian Pty Ltd