



Modern Slavery Policy

Nido Education Limited ACN 650 967 703 (Company)

Modern Slavery Policy

1. Policy Statement

Nido Education Limited ACN 650 967 703 (**Company**) and, together with its controlled entities (**Group**) has a strong commitment to social responsibility. In formulating and delivering our business strategy we take into account our responsibility to the community, environment, our people and our clients.

The purpose of this policy is to:

- (a) ensure that the goods and services purchased through our supply and value chains are ethical and minimise or eradicate Modern Slavery risks;
- (b) set out the responsibilities of the Group, our employees, operations and suppliers in observing and upholding the Group's position on Modern Slavery; and
- (c) provide information and guidance to our employees on how to recognise and deal with Modern Slavery issues.

This policy is endorsed by the Board of Nido Education Limited (**Board**) and senior management of the Group, who have ultimate responsibility for its implementation.

2. Who is covered by the policy?

This policy applies to the Board, management, staff and contractors engaged and undertaking work on behalf of the Group, wherever they may be located (collectively referred to as **personnel** in this policy).

This policy applies to our operations, activities and all of our dealings with third parties whether they be with private organisations, individuals or any representatives of such persons. Compliance with this policy is the responsibility of all Group personnel (irrespective of an individual's particular role or responsibilities).

The Group expects our suppliers to uphold the same standards, including in our suppliers' dealings with their suppliers, and the Group commits to working in partnership with our suppliers to implement this policy.

3. Meaning of Modern Slavery

The *Modern Slavery Act 2018* (Cth) requires all Australian entities or foreign entities carrying on business in Australia that have a consolidated revenue of \$100 million or more, to publicly report on, amongst other things, risks of Modern Slavery in their operations (including investments and financial lending) and supply chains.

The Group defines **Modern Slavery** in accordance with the definitions provided in the *Modern Slavery Act 2018* (Cth), that is, including:

- (a) slavery (the condition of a victim over whom any or all of the powers attaching to the right of ownership are exercised, including where such a condition results from a debt or contract made by the victim);
- (b) servitude (the condition of a victim who provides labour or services including sexual services and because of the use of coercion, threat or deception, they are not free to stop working or leave their place of work and are significantly deprived of personal freedom);

- (c) forced labour (the condition of a victim who provides labour or services and because of the use of coercion, threat or deception, they are not free to stop working or leave their place of work);
- (d) deceptive recruiting (the condition of a victim being deceived about whether they will be exploited through a form of modern slavery);
- (e) forced marriage (where coercion, threats or deception are used or where the victim does not understand or is incapable of understanding the nature and effect of the marriage ceremony which causes the victim to marry without their free or full consent);
- (f) debt bondage (the condition of a victim's services being pledged as security for a debt, the debt is manifestly excessive, the reasonable value of the victim's services are not used to liquidate the debt, or the length and nature of the victim's services are not limited and defined);
- (g) trafficking in persons (the recruitment, transportation, transfer, harbouring or receipt of persons, by means of coercion, threat or deception, for exploitation through modern slavery); and
- (h) the worst forms of child labour including:
 - (i) where children are exploited through slavery or practices similar to slavery, such as the sale and trafficking of children, debt bondage, serfdom and forced or compulsory labour;
 - (ii) the use, procuring or offering of a child for prostitution, for the production of pornography or for pornographic performances;
 - (iii) the use, procuring or offering of a child for illicit activities, in particular for the production and trafficking of drugs; and
 - (iv) children are engaged in work which is likely to harm their 'health, safety or morals';¹ and
 - (v) offences relating to use of children for production of child abuse material and to the production, dissemination or possession of child abuse material.

4. Ethical Standards

The Group endeavours to ensure that we, and our personnel, comply with all laws related to Modern Slavery or other prohibited business practices, within our operations, activities and supply chains, endeavouring to ensure:

- (a) employment is freely chosen;
- (b) child labour is not used;
- (c) a living wage is paid to all individuals;
- (d) individuals are not required to work excessive hours;
- (e) entities promote a no tolerance discrimination policy; and
- (f) there is freedom of association and collective bargaining.

¹ s 4 of the Modern Slavery Act 2018 (Cth); Article 3 of the ILO Convention (No. 182) concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour, done at Geneva on 17 June 1999 ([2007] ATS 38).

The principle of ethical behaviour also governs the conduct of all our procurement activities. All personnel who procure goods, services, consultancy and capital work must comply with the standards of integrity, probity, professional conduct and ethical behaviour including:

- (a) to deal fairly, impartially and consistently with all suppliers;
- (b) to maintain the confidentiality of confidential and sensitive information obtained as part of the procurement process;
- (c) to formally declare any actual, potential or perceived conflicts of interest prior to the commitment of the procurement activity and abstain from any procurement activity where it has been deemed that an actual potential or perceived conflict of interest exists;
- (d) to examine and consider the integrity of the potential supplier, including the original source (where possible) of the product and whether there is the risk of any harmful labour practices or human exploitation (of any kind) based on the industry, location of the supplier or other factors; and
- (e) to ensure that the procurement function is documented in such a way as to be able to reasonably demonstrate that decisions and purchases were made in accordance with the procurement policies, and all other Group policies and applicable laws.

5. Dealings with Suppliers

The Group's approach to Modern Slavery and ethical business standards, including our expectations as set out in this policy, must be communicated in writing to all suppliers at the outset of our business relationship with them.

In addition, Suppliers are required to comply with the Group's Supplier Code of Conduct.

Prohibited Business Practices

The Group requires all suppliers to comply with all applicable Australian and international laws in relation to prohibited business practices, and to support internationally accepted standards, treaties and declarations in relation to prohibited business practices, including (but not limited to):

- (a) bribery and corruption;
- (b) money laundering;
- (c) financing terrorism;
- (d) breaches of labour standards, including any form of exploitation or involuntary labour and workers' rights;
- (e) breaches of modern slavery legislation including the *Modern Slavery Act 2018* (Cth);
- (f) breaches of workplace health and safety laws;
- (g) violations of human rights including discrimination in all its forms;
- (h) breaches of privacy and data protection obligations;
- (i) violations of trade and import rules; and
- (j) unfair competition.

Modern Slavery

We mandate that all our suppliers follow the following requirements related to risks of Modern Slavery before entering into any supplier contracts.

- (a) Suppliers must not employ children under the legal age of employment in any country or local jurisdiction. If the minimum age of employment is not defined, it will be 15 years of age. Workers under the age of 18 must only perform work in accordance with legal requirements (e.g. with regard to working time, wages and working conditions) and subject to any requirement regarding education or training.
- (b) Suppliers must not use any form of forced, bonded or involuntary labour. All labour must be voluntary. Workers must be allowed to maintain control over their identification documents (e.g. passports, work permits or any other personal legal documents). The supplier must ensure that workers do not pay fees or make any payment connected to obtaining employment throughout the hiring process and the employment period. The supplier must be responsible for payment of all fees and expenses (e.g. licences and levies) relating to workers, where legally required.
- (c) Punishment and/or mental or physical coercion are prohibited. Disciplinary policies and procedures must be clearly defined and communicated to workers.
- (d) Suppliers must comply with all applicable national laws and mandatory industry standards regarding working hours, overtime, wages and benefits. Suppliers must pay workers in a timely manner and clearly convey the basis on which workers are being paid.
- (e) Deductions from wages as a disciplinary measure must not be allowed, if not legally permitted and even where legally permitted, should be minimised.
- (f) The workers of the supplier must be free to join or not to join a union/employee representation of their choice, free from threat or intimidation. Suppliers recognise and respect the right to collectively bargain in accordance with applicable laws.
- (g) Suppliers must promote an inclusive work environment that values the diversity of its workers. The supplier must not discriminate or tolerate discrimination with respect to gender, race, religion, age, disability, sexual orientation, national origin or any other characteristic protected under applicable laws.
- (h) We expect our suppliers to strive to implement the standards of occupational health and safety at a high level by applying a health and safety management approach appropriate to business. Suppliers must comply with applicable occupational health and safety regulations and provide a work environment that is safe and conducive to good health, in order to preserve the health of workers, safeguard third parties and prevent accidents, injuries and work-related illness. This includes regular workplace risk assessments and the implementation of adequate hazard control and precautionary measures. Workers are to be adequately educated and trained in health and safety issues.

Suppliers' Compliance

The Group reserves the right, upon reasonable notice, to check compliance with the requirements of the Supplier Code of Conduct.

The Group requires suppliers to notify us by contacting the Company Secretary of any breaches (including any pending charges) of any laws related to Modern Slavery or prohibited

business practices as part of their commitment to full and frank disclosure for the protection of our business, our people, our clients and the community.

Where you have concerns that conduct by a supplier may constitute Modern Slavery or a breach of laws related to Modern Slavery or prohibited business practices, you must contact the Company Secretary.

6. Training and communication

Training on this policy forms part of the induction process for all new personnel. All existing personnel will receive relevant training at appropriate intervals on how to implement and adhere to this policy.

7. Who is responsible for the policy?

The Board has overall responsibility for ensuring this policy complies with the Group's legal and ethical obligations, and that all those under our control comply with it.

The Company Secretary has primary and day-to-day responsibility for implementing this policy, and for monitoring its use and effectiveness. Management at all levels are responsible for ensuring those reporting to them are made aware of and understand this policy and are given adequate training on it at appropriate intervals. This policy, and the Group's internal control systems and procedures, will be subject to regular reviews to provide assurance that they are effective in countering Modern Slavery.

8. How to raise a concern

The Group supports and encourages personnel to raise genuine grievances about Modern Slavery matters, whether identified by, or affecting them, in the workplace. We encourage our personnel and the representatives of our suppliers to report any instances that suggest:

- (a) that there is a risk, both potential and actual, of Modern Slavery occurring in the supply chain, activities or recruitment function of the Group or its suppliers; and
- (b) that suppliers or third-party contractors engaged by the Group are engaging in, potential or actual Modern Slavery.

If at any time you:

- (a) have any questions about the application of this policy; or
- (b) need guidance or assistance in a particular case,

you should in the first instance consult the Company Secretary.

The Group seeks to ensure that its personnel can raise concerns without fear that their future employment prospects will be adversely affected.

If you wish to report a concern in relation to Modern Slavery, including any conduct that may be a or result in a breach of this policy, you may raise it with the Company Secretary.

Please also refer to the Group's Whistleblowing Policy for further detail on conduct that is reportable under the Group's Whistleblowing Policy and how to report conduct under that policy.

9. Related policies

The Group has a number of policies and plans that deal with the risk, mitigation and management of Modern Slavery risks in its activities, operations and supply chains, including:

- (a) the Group's Supplier Code of Conduct, where applicable;
- (b) the Group's Code of Conduct Policy, where applicable; and
- (c) the Group's Anti-Bribery, Fraud and Corruption Policy, where applicable.

10. Guidelines

As a guide, set out in Schedule 1 are some practical guidelines to assist personnel in complying with this policy. This list is indicative only and does not address all potential circumstances to which this policy may apply.

11. Regular Review of Policy

This Policy must be reviewed as required from time to time to ensure it remains consistent with the Group's objectives and existing regulatory requirements and recommendations.

12. Approved and adopted

This policy was approved and adopted by the Board on 17 December 2024.

Schedule 1 – Modern Slavery Guidelines

Set out below are a number of guidelines to assist personnel in complying with this policy. The list is not intended to be exhaustive and is for illustrative purposes only.

1. Always:

- (a) Conduct appropriate due diligence throughout the lifecycle of our engagement with a supplier to address the risks of Modern Slavery in connection with supply.
- (b) Communicate our Modern Slavery requirements for suppliers and ensure that, where appropriate, suppliers are required to confirm their compliance with our Supplier Code of Conduct and the *Modern Slavery Act 2018* (Cth).
- (c) Seek to anticipate and plan in advance for new or potential circumstances where Modern Slavery or risk of Modern Slavery may occur, for example via the introduction of new products, services or suppliers.
- (d) Acknowledge the necessity to prevent, and address risks of, Modern Slavery in our business operations and supply chains when setting key performance indicators (**KPIs**) and do not penalise individuals and teams for failing to meet KPIs as a result of such compliance. For example, make sure KPIs do not promote a focus on securing the lowest possible costs and rapid delivery times from suppliers as this may inadvertently contribute to Modern Slavery risks.
- (e) Regularly review supplier's compliance with the requirements of our Supplier Code of Conduct.
- (f) Immediately report any indications of Modern Slavery or any concerns you have about risks of Modern Slavery, in our operations and supply chain.
- (g) Ensure all actions taken in the response to any instances of Modern Slavery are in the best interests of the suspected victim or victims.

2. Never:

- (a) Engage in practices of Modern Slavery such as using forced, compulsory or involuntary labour.
- (b) Do anything to enable someone else, including a supplier, agent or representative of the Group to engage in or facilitate practices of Modern Slavery.
- (c) Allow detrimental treatment (dismissal, disciplinary action, threats or unfavourable treatment connected with raising a concern) as a result of an employee reporting, in good faith, a suspicion that Modern Slavery may be taking place in any part of the Group or its supply chains.
- (d) Attempt to resolve a situation of Modern Slavery yourself.

3. Be cautious of:

- (a) Processes that promote a 'tick box' approach to compliance in lieu of continuous improvement in the management of Modern Slavery risks.
- (b) High risk procurement and recruitment practices, such as engagement with indirect suppliers, employment agencies and sub-contracting arrangements.

- (c) High risk indicators of Modern Slavery in connection with supply, including but not limited to:
 - (i) the industry (i.e. frequent use of unskilled, short-term or temporary labour);
 - (ii) the product or service (i.e. materials reported to involve a risk of labour exploitation);
 - (iii) geography (i.e. goods are made or labour is sourced in a country where there is a risk of labour exploitation); and
 - (iv) the entity (i.e. an entity has been previously reported as noncompliant with labour standards).
- (d) Background information about existing or potential suppliers and their representatives that may indicate the prevalence of improper practices, such as information from international organisations and NGOs regarding human rights and unethical business practices and information related to their reputation, beneficial ownership and qualifications.