

# Modern Slavery Statement 2022





## MEGT Modern Slavery statement

MEGT will not tolerate any form of modern slavery in its operations and supply chain. We are fully committed to operating responsibly, while establishing and adhering to the highest ethical standards across the business. This Modern Slavery Statement is made in accordance with the Australian Modern Slavery Act 2018 (Cth) and is relevant to the reporting period ending 30 June 2022. It describes the steps and approach taken during the financial year to identify and minimise the risk of exposure to modern slavery across the organisation and its supply chain.

## The MEGT Structure

MEGT (Australia) Ltd, ABN 85 006 266 280, registered office at 29 Ringwood Street, Ringwood Vic 3134 (MEGT). MEGT is a not-for-profit public company limited by guarantee which was established to be, and continues to be, a charity.

The other entities associated with MEGT are:

- Australian Business Colleges Pty Ltd.
- Australian Training Consultancy Pty Ltd.

Only MEGT Australia Ltd operated during the financial year and is affected by the provisions of the Act.



## About MEGT

MEGT is a not-for-profit organisation which has been supporting employers, apprentices, trainees, job seekers and students since 1982. Originally known as the Outer Eastern Apprenticeship Scheme, by 1999 MEGT had commenced operations in New South Wales.

We now operate from our head office in Ringwood, Victoria and from a total of 66 offices across the country, along with a team of local apprenticeship experts who are dedicated to meeting the needs of the communities in which they live and the businesses which operate there. MEGT is also a registered Group Training Organisation (GTO) providing:

- End-to-end apprenticeship and traineeship program management
- High-quality, work-ready apprentice and trainee candidates
- Fast, easy apprentice and trainee payroll services
- Ongoing mentoring and support

As of 30 June 2022, MEGT employed 584 staff, six Directors, 11 contractors and 34 trainees (total 635). There were also approximately 1,074 labor hired apprentices/trainees in the Recruitment Management Services (Group Training) Division.

# Purpose and Values



## Growth

We invest in our people which is what grows our business.



## Inclusion

We respect the experiences, opinions and contributions of all individuals.



## Courage

We are brave enough to challenge ourselves and others.



## Innovation

We embrace change to create meaningful solutions.



## Collaboration

We share our knowledge and skills so that all of us can achieve.



## Sustainability

We commit to making business decisions that leave our world a better place.

**Mission:** “Partnering with our customers, we facilitate equal access to skills, training and careers by attracting and developing an exceptional team.”

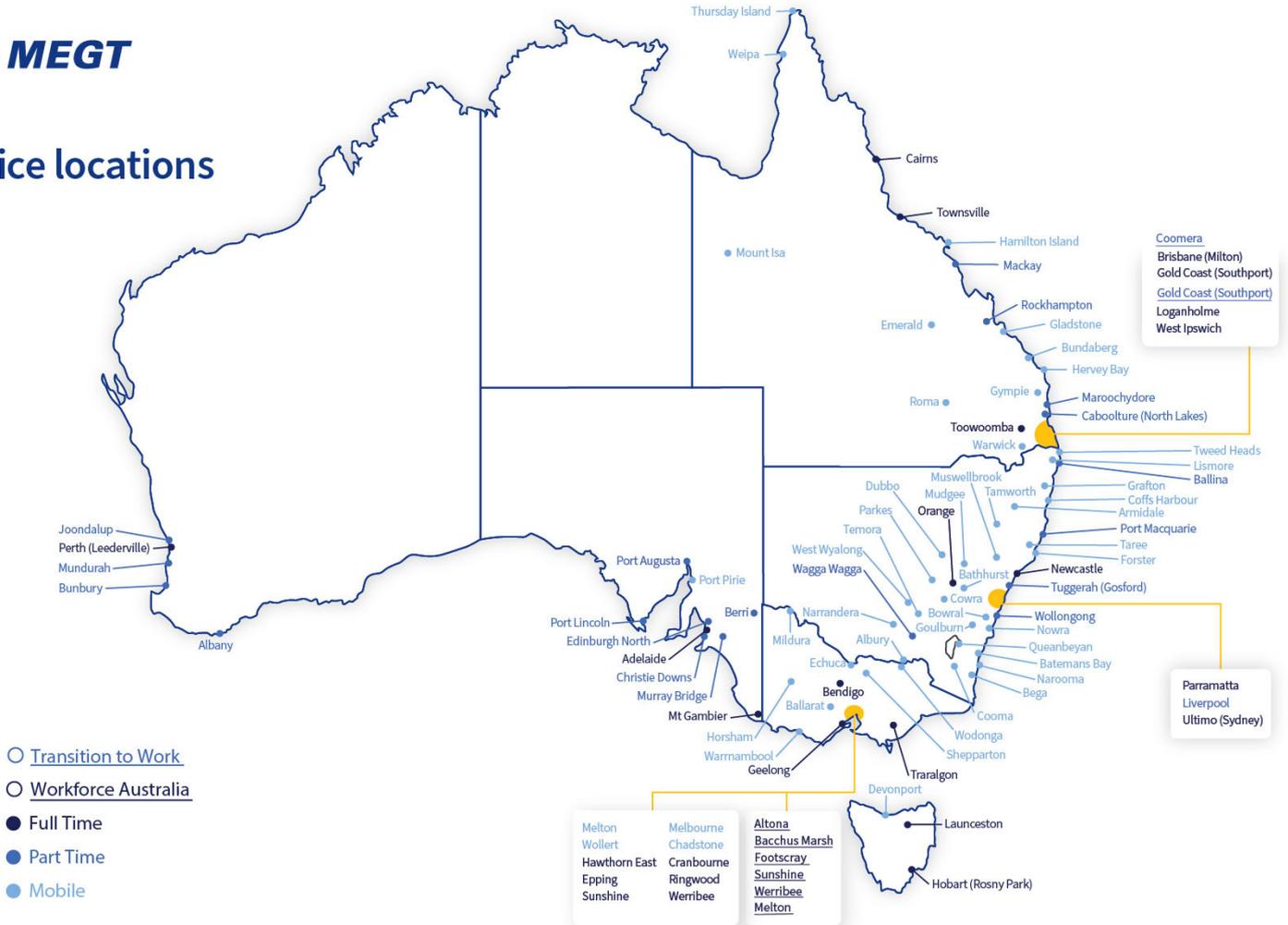
**Vision:** “Our vision is to be a leader in creating education, skills and career outcomes.”

# Where we are

MEGT has an operational presence in all states and territories of Australia except the Northern Territory.



## Office locations



# What we do



## Service Guide

- MEGT is the Group Training Organisation (GTO) which places apprentices and trainees with host employers.
- Host employers provide on-the-job training, supervision and experience. In turn, the apprentice or trainee provides the host employer with skills and services.
- A Registered Training Organisation (RTO) provides formal training to compliment the apprentice or trainee's practical experience.
- To support this, the Apprentice Network Provider (ANP) administers the training contract and provides support for the apprentice or trainee and their host employer.
- Our Employment Services help job seekers kickstart their careers through a diverse range of programs, across several industries. Offerings include: Workforce Australia and Transition to Work, I Construct, Built by Jill, Empowering Pathways into Aged Care, I Got Brushed, SA Test a Trade and Aged Car Potential.

Our core service is to empower local communities to help improve their career and development opportunities. We are committed to providing quality employment solutions for all Australians, and to help businesses, apprentices and trainees get the most from the Australian Apprenticeships program.

## Recruitment and Management Services (RMS)

Our Recruitment and Management Services (RMS) division operates under a GTO (Group Training Organisation) model and provides expertise in all aspects of apprentice and trainee management, including:

- Apprentice/trainee sourcing and recruitment
- Employer Work Health & Safety assessments, recommendations, and support
- Site-specific inductions and safety training, along with dedicated field staff

## Apprenticeship Network Provider (ANP)

We are an Apprenticeship Network Provider (ANP) contracted by the Federal Government to provide Australian Apprenticeship Support Network (AASN) services. We offer a free service which provides:

- Sign-up and registration of apprentices and trainees
- Assistance with Government financial incentives that may be available
- Accurate and efficient processing of Training Contracts and incentive claim forms
- Access to our free online job board and employer/job seeker toolkits
- Easy online access to apprentice and trainee records
- Ongoing contact and support for employers, apprentices and trainees

MEGT has a dedicated local presence in every state, backed by national administration teams that continuously exceed Government quality and compliance benchmarks.

## Employment Services

Our Employment Services Division provides job seekers with a range of programs and qualifications pathways across several industries. All are designed to either kickstart a job seekers' career, or to help provide access to more skills training and qualifications in their chosen field.

Employment Services programs include those in the information technology, cyber security, construction and aged care sectors, and programs designed to assist disadvantaged groups to enter or re-enter the workforce.

## Group Training Services

As a registered Group Training Organisation (GTO), we know the value and productivity that apprentices and trainees can add to the workforce. We offer a 'whole-of-business' approach, including:

- Workforce planning, skills gap analyses and budgeting.
- Identification of opportunities for apprentices or trainees to join the workforce.
- Sourcing, screening, onboarding, payroll, administration and reporting.
- Ongoing management of work performance, health and safety and training requirements.

Our Group Training Services are a simple and low-risk solution to hiring and managing. We remain the apprentice or trainee's legal employer, whilst the Host Employer provides day-to-day work, supervision, and workplace job training and development.

## MEGT's Governance

The MEGT Board is comprised of 6 members with all being independent Non-Executive Directors. The Board is responsible for monitoring the strategic direction of MEGT and ensuring that management recognises and complies with all legal and social obligations. The Board has established three committees to monitor and fulfil its obligations:

- Remuneration and Governance Committee.
- Finance and Audit Committee.
- Strategy and Risk Committee.

The role of setting and managing our responsibility towards modern slavery has been assigned to the Senior Management and Executive team and is formally directed by the Strategy and Risk Committee for oversight. This allows for risk identification, management and assessment to be continually developed and improved, as monitored by our Board of Directors

MEGT operates in an ethical and transparent manner, investing in staff development, strong quality assurance and risk management frameworks. Organisationally, we review the safety, quality and performance of our services through risk-based analyses to continuously improve.

MEGT has received accreditation for ISO9001 and ISO27001, both of which are underpinned by risk-based methodologies. As an illustration of our ongoing commitment to information security, MEGT also holds Right Fit For Risk (RFFR) cyber security certification for the protection of information and data collected and stored in the administration of its programs. This includes programs delivered with the assistance of external service providers.

Our overall risk-based approach is promoted through:

- Organisation-wide audit and review cycles
- Regularly sourcing and reviewing stakeholder feedback
- Monitoring Industry and Government policy and legislation
- Senior management oversight of risk management processes.

The MEGT Risk Management Team meets monthly and is responsible for identification and management of risks and monitoring adherence to risk management policies and procedures. We operate divisional risk management profiles which are reviewed and updated quarterly, with results aggregated and tabled for the Risk and Strategy Committee and Board consideration. Progress against approved risk management plans is reviewed regularly to monitor the effectiveness of risk management across the organisation.

# MEGT's Operations and Supply chain

In 2022 we procured goods and services from 741 supply entities, 732 of which are Australian based.

## MEGT's Suppliers By Country of Origin



Our third-party supply arrangements fall broadly into the following two areas of expenditure:

- **Corporate and operational procurements:** Includes goods and services procured to enable the daily operation of the organisation and delivery of services, such as property and occupancy costs, motor vehicle running costs, information technology, uniforms, cleaning and tools of trade for our apprentices and trainees and other office-related expenses.
- **Capital spend:** For motor vehicles, leasehold fit outs, furniture and fittings and other IT related CAPEX.

The table below summarises expenditures showing each category as a percentage of total spend:

Supply Category	% of Total Spend
Motor Vehicle Expenses	14.95%
Consultancy, Legal and Accounting Fees	14.39%
Computer Expenses	10.69%
Office Expenses	9.46%
Lease and Occupancy	8.72%
Super	8.01%
Telecommunications	6.71%
Training & Conferences	5.35%
Insurance	3.66%
Advertising & Promotions	3.59%
TAFE Fees	3.51%
Equipment & Building Maintenance	3.24%
Membership Fees	2.31%
Office Equipment	1.35%
Travel & Accommodation	0.70%
Legal Costs	0.53%
Workcare Medical Expense	0.53%
Office Cleaning	0.44%
Printing & Photocopying	0.38%
Electricity	0.36%
Protective Clothing	0.34%
Other	0.76%
	<b>100%</b>

# Identifying Modern Slavery Risks

During 2022, MEGT carried out a high-level risk assessment of key suppliers engaged throughout the organisation using the guidance from the Department of Home Affairs and the underlying principles as set out by United Nations Human Rights Office of the High Commission and OECD.

## MEGT's Operations

MEGT has identified the risk of modern slavery in its operational environments as very low. This is attributable to the following factors:

- MEGT invests in a professional People & Culture team which strives to create and provide working conditions that not only meet minimum standards but exceed them
- MEGT promotes a culture that fosters equality, diversity, unity, understanding and respect for all. The principles under which we operate are set out in the various policies and practices which are outlined below:
  1. We work under specific Industry Awards and Enterprise Agreements which meet the National Employment Standards set out by Fair Work.
  2. The Australian Human Rights principles of dignity, equality and mutual respect are embedded in our:
    - a. Code of Conduct
    - b. Equal Opportunity and Diversity Policy
    - c. Anti-Bullying Policy and Procedure
    - d. Recruitment and Selection Policy and Procedure
    - e. Unacceptable Workplace Behavior Guidelines
  3. We protect the working conditions of our staff through the Work Health and Safety Policy.
  4. We place a significant focus on diversity through our:
    - a. Equal Opportunity and Diversity policy
    - b. Reconciliation Action Plan
    - c. Indigenous Australians policy
  5. MEGT is compliant with gender reporting under the Workplace gender Equality Act.
  6. MEGT is an active member of the Australian Network on Disability.

In addition, as part of the Remuneration and Governance Charter, MEGT regularly conducts external reviews of Employee Awards, Enterprise Agreements and Employment contracts to ensure we are meeting our obligations.



## MEGT's Supply Chain

MEGT does not procure raw materials or component parts to manufacture products, nor does it procure or hold inventory for resale. As a service-based organisation, we do procure goods and services from a large number of suppliers to effectively run and sustain our operations.

The following risk factors have been used to inform our supply chain risk analysis:

### Geographic risk.

By far the majority of our suppliers are located in Australia. In our view, these suppliers have a lower risk of modern slavery occurring in their own operations as they are governed by Australian laws and regulations and operate within a society and a commercial environment where modern slavery practices are rightly condemned.

There is a reduced risk due to the nature of the industry in which we operate (Professional Services), according to the Global Slavery Index.org publication. We acknowledge there are inherent risks of modern slavery in some of the countries we have conducted business. Such risk exists specifically in the following areas:

- Migrant labor exploitation
- Excessive overtime
- Forced labor

These risks were abated with the divestment of our Education Group business units in a previous reporting period.

### Product, services and industry risk

On the basis that our organisational relationships include hundreds of entities in our supply chain (including entities we do not have a direct contractual relationship with), there are risks that MEGT's engagements are connected to modern slavery through the activities of our suppliers' own supply chains.

For example, at many MEGT premises we engage contractors to provide facility services such as cleaning and maintenance. It is a widespread business practice for primary contractors in these low-skilled industries to outsource subcontracting arrangements and/or labor hire. This becomes increasingly difficult for MEGT to control when there is no clear line-of-sight over who is providing the end service.

Using the Global Slavery index Vulnerability model, MEGT has also identified that various suppliers source products from high-risk countries. These high-risk countries are more likely to contribute to modern slavery practices.

Some examples of these high-risk supplies in our organisation are:

- Construction and building materials used in office fit outs and office equipment
- Technology including hardware and software
- Catering and food related products such as tea or coffee
- Textile-related goods such as protective wear and uniforms.
- Motor vehicles and component parts



# Actions taken to address key identified modern slavery risks

We are committed to acting ethically and with integrity in all our business relationships. This involves taking reasonable steps to ensure that modern slavery does not exist in either our business or supply chain. When we engage with new and existing suppliers, they are expected to share our commitment to act lawfully and ethically to ensure full compliance with modern slavery obligations.

Our focus in this reporting period has again been to reinforce knowledge of our modern slavery obligations throughout the business, continue to raise awareness of the issues and risks, and to further identify potential high-risk suppliers.

## 1. Appointing key staff

In FY22 we created and embedded the new role of Procurement and Contracts Manager to establish a company-wide procurement framework as our unified operating model for all activities related to the sourcing of goods and services from external providers.

The responsibilities of this role also include:

- Being a focal point for contractors, suppliers, aspiring suppliers and MEGT staff involved in external supply relationships
- Setting out engagement standards for suppliers and third-party providers to operate ethically and to address modern slavery risks in their business operations and supply chains
- Creating a supplier Code of Conduct (Modern Slavery) detailing the minimum standards of behavior expected of our suppliers and contractors
- Establishing an electronic Contract Management System capable of capturing supplier credentials including their compliance with the Modern Slavery Act
- Increasing 'procurement maturity' within the organisation, including the thorough evaluation of commercial proposals and the careful selection and appointment of key suppliers

In addition, MEGT continues to deliver effective control of our supply chain relationships and management of these risks by limiting delegations of authority for supplier engagement and contracting to only a small number of executives and senior managers.

## 2. Building our understanding and capability

The business has researched and examined key issues associated with modern slavery. Our 'first line of defense' is to ensure we have a well informed and capable team making decisions on the engagement of, and relationships with, our supply chain. This education also extends to the general workforce to increase awareness and cast a wider net across the organisation to identify instances where modern slavery may exist.

To build the required knowledge and to maintain a consistent level of awareness within our team, MEGT utilises an interactive modern slavery training course, 'Combatting Modern Slavery', on our digital learning management platform. This course is designed to help those in leadership, management, procurement, and risk management roles who are involved in identifying, assessing and addressing modern slavery risks. It defines modern slavery, describes its impact on an organisation, identifies ways to mitigate risks, and explains how to report on modern slavery within the MEGT's operations and supply chains.

This training module addresses the following key areas:

- Defines and raises awareness of the complex issues associated with modern slavery
- Identifies the types of modern slavery that exist in society
- Identifies and discusses the geographical and industry specific impacts of modern slavery
- Identifies risk factors across sectors and assists staff to address the risks
- Trains staff to identify signs of people suffering from modern slavery
- Outlines the consequences of modern slavery to an organisation
- Provides an overview of the Modern Slavery Act 2018 and reporting requirement.

### 3. Improving policies and procedures

In this statement, MEGT has highlighted the internal policies and procedures to ensure we address our corporate, social and legal responsibilities. These documents are regularly updated to incorporate evolving issues such as modern slavery. Through our training, code of conduct, equal opportunity and diversity policies, we demonstrate a strong commitment to emerging issues and continually set a high standard of values that our staff are expected to exhibit.

### 4. Engagement with suppliers

Our primary resources for addressing the risks associated with modern slavery in the supply chain are the skills and experience of our people and the internal controls we have in place. The following points outline MEGT's efforts as they relate to engagement with our suppliers:

- Our new Procurement and Contracts Manager has designed a framework that includes a greater degree of visibility over suppliers and the contract lifecycle. This approach requires our suppliers to demonstrate sound commercial hygiene practices and to support the governance responsibilities MEGT is obliged to meet as a Federal Government contractor, including full adherence to the requirements of the Modern Slavery Act
- As part of our broader Contractor Induction Process, MEGT has in place a *Supplier Questionnaire - Identifying Modern Slavery Risks* which is used when engaging with low and high-risk suppliers. This improves confidence in a collaborative way that suppliers are assessing their own supply chains for the potential of exposure to modern slavery
- MEGT suppliers in some key risk categories are required to provide evidence of rejection of modern slavery practices in their operations beyond the above supplier questionnaire. An example of this is the category of corporate workwear (uniforms) where our contracted supplier has demonstrated it holds the following accreditations and policies:
  - *Platinum Worldwide Response Accredited Production (WRAP)* Certification for humane and ethical manufacturing
  - *Ethical Clothing Australia (ECA)* accreditation assuring the legal minimum wage, full employment entitlements and safe working conditions are enforced
  - *Modern Slavery Statement* (despite not having to undertake mandatory MSS reporting)
  - *Equal Opportunity and Discrimination Policy*
- Only a limited number of Executives and senior managers have the delegated authority to commit the organisation to new supply arrangements. These individuals are skilled commercial negotiators with the ability to diligently identify risks including the potential for modern slavery
- Over time, MEGT has developed long lasting supply relationships. Having been in operation since 1982, the longevity of our business enables close and transparent supplier relationships allowing the diligent identification of unlawful behaviors
- MEGT does not deal in cash. Our dealing with all suppliers is transparent and we only pay by means of electronic transfer upon receipt of a proper tax invoice. This reduces substantially the risk of unlawful commercial conduct, especially as some companies receive and pay employees in cash creating the potential for exploitation



## 5. Remediation process

MEGT's operations and supply chains have remained largely unchanged since the previous reporting period and the risks of modern slavery practices in both have also remained unchanged. Further work is needed, and we will continue growing our capability to identify risks of modern slavery and ensure our ongoing commitment to protecting the human rights of people in our operations and supply chain.

We will further develop and refine a formal remediation policy. However, the following steps remain in place in the event action is required to rectify modern slavery:

- Events of reported modern slavery to be escalated to the Executive team and reported to the Chair of the Board
- Provide the support necessary for a rapid, coordinated response if victims of modern slavery are identified in our operations or supply chain
- Provide a confidential grievance mechanism to report suspected incidents of modern slavery
- Provide practical and timely support for any person impacted by modern slavery in our operations
- Develop a corrective action plan on a case-by-case basis
- Cease any contract or supply arrangement where the supplier is deemed to have acted in breach of their obligations under the Modern Slavery Act

Addressing modern slavery risks with the ultimate goal of its global eradication begins with the individual. Beyond the organisational measures taken to address key identified modern slavery risks, MEGT also expects employees to familiarise themselves with, and adhere to, relevant laws and governing policies, to actively mitigate risk in their areas of control, and ensure that any instances are reported for the immediate attention of the organisation.



Educate yourself



Read policies and legislation



Report it



Mitigate the risks



Advocate

# Assessing the effectiveness of actions being taken

Continual reviews and assessments of the effectiveness of our policies, codes, standards and procedures relating to modern slavery forms part of the ongoing agenda for the MEGT Risk Management Team. The committee will continue to report and provide recommendations for action and change to the Executive Team for consideration and approval to be implemented.

## Looking ahead

MEGT is strongly against modern slavery and remains committed to tackling the issue in its operations and supply chain. We are further committed as a whole business, from the Board of Directors, Executive Team and all other employees, to implementing the actions and processes necessary for the continual improvement of what is required to deal with modern slavery risks in our operations and supply chain.

Our plan is to take the following actions during subsequent reporting periods to reduce the risk posed by modern slavery internally in our business operations and in our external supply chain:

- Embed the new Procurement Framework within MEGT, informed by our governance documents and standards which set out our terms of engagement for suppliers and third-party providers, to operate ethically and to address modern slavery risks in their business operations and supply chains
- Further refine our risk assessment and mitigation tools by digitising both our supplier questionnaire (Identifying Modern Slavery Risks) and our Supplier Code of Conduct (Modern Slavery) as a single seamless process to survey and record compliance with MEGT's minimum expectations for major suppliers
- Continue to capture any reported incidents of modern slavery within our business operations and within our supply chain, undertake investigation and reporting, and remediate or mitigate any recurrent risks.
- Continue to undertake modern slavery awareness training and continue to give employees specific training in relation to modern slavery risk management tools
- Create appropriate inclusions for new supplier contracts to ensure suppliers take all reasonable steps to remove the risk of modern slavery from their supply chains
- Develop a Modern Slavery Policy with the purpose of managing and mitigating the risk of modern slavery within our business operations and supply chain. The policy will provide a framework to ensure compliance with the reporting requirements of the Modern Slavery Act

In addition, MEGT continues to deliver effective control of our supply chain relationships and management of these risks by limiting delegations of authority for supplier engagement and contracting to only a small number of executives and senior managers.

## Consultation

This statement was prepared by a working group within MEGT which is leading our modern slavery compliance initiatives. The group collaborated with each business unit to develop the document which has been reviewed and endorsed by our Senior Management and Executive Team prior to submitting for adoption by the Board of MEGT. The MEGT Modern Slavery Statement (2022) has since been approved by the Board of Directors of MEGT (Australia) Ltd.

**Signed by the Chairman of MEGT (Australia) Ltd**



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William Barry O'Gorman

[megt.com.au](http://megt.com.au)

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MEGT acknowledges the traditional owners and custodians of the land we work on as the first peoples of this country.

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