



Modern Slavery Statement 2024

ONLINE EDUCATION SERVICES PTY LTD ACN 148 177 959 (OES)

Registered Office
Level 1, 60 Cremorne Street
CREMORNE VIC 3121

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16(1)(g)	Provide any other relevant information	Not applicable

Modern Slavery Statement 2024

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About this Statement

This Modern Slavery Statement (Statement) addresses the requirements of the Modern Slavery Act 2018 (Cth) (Act) for Online Education Services Pty Ltd (ACN 148 177 959, OES) and the entities it controls (the OES Group). It covers the period 1 July 2023 to 30 June 2024 (FY2024). Refer to page 2 for an overview of where each of the mandatory criteria have been addressed.

Acknowledgement of Country

OES respectfully acknowledges the Traditional Custodians of the lands on which we work, live, teach and learn.

We acknowledge Australia's Aboriginal and Torres Strait Islander peoples as Australia's First Peoples, paying respects to their rich cultures, to their Elders past, present and future, and their continuing custodianship of the land, waterways and community on which we all rely.

We extend that respect to all Aboriginal and Torres Strait Islander peoples.

We recognise and value the ongoing contribution of Aboriginal and Torres Strait Islander peoples and communities to Australian life and how this enriches us all.

Message from the Chief Executive Officer

I am pleased to present our Modern Slavery Statement for FY2024.

OES recognises the importance of combating modern slavery, which adversely impacts workers and communities worldwide. Addressing modern slavery risk across our business is a part of our commitment to having a positive impact on the communities in which we operate.

OES Group is a designer, developer and deliverer of online education. Due to the nature of OES Group's services, its predominantly online mode of delivery and the skilled workers and academics that contribute to them, we consider the inherent risk of modern slavery practices within our operations is low. We do acknowledge the risk of modern slavery in our supply chains and have made progress in regard to the processes we have in place to assess and minimise the risks of modern slavery practices in the operations and supply chains of the OES Group.

Modern slavery risks always evolve, and our work in this area will never be completed. We will continue to invest time and resources and encourage cooperation from suppliers, and other stakeholders to tackle modern slavery as a collective effort.



Denice Pitt

Chief Executive Officer

About OES

OES is a company incorporated in Australia with its registered office and principal place of business at Level 1, 60 Cremorne Street, Cremorne, Victoria 3121, Australia.

OES is an online education enabler that provides a market-leading range of tailored solutions for online learning, partnering with universities, training institutes and professional bodies worldwide. OES's Vision is to be the world's most impactful enabler of education, with a clear Purpose of passionately enhancing lives through education.

OES was established in 2011 by SEEK Limited and Swinburne University of Technology to give people a chance to change their lives through online education. For over a decade, global partnerships have been formed to develop and enable immersive online, on-campus and blended learning experiences and solutions.

Modern slavery is an issue of global significance and OES Management and the OES Board recognises that as a global citizen, OES has a role to play in mitigating its impact. OES has made progress during FY2024 and is committed to further strengthening its initiatives in FY2025.

Structure and operations

Our structure

OES is a private company limited by shares, incorporated under the laws of Australia. SEEK Growth Nominees Pty Ltd, as Trustee for the SEEK Growth Fund, holds an 80% interest in OES, with Swinburne University of Technology holding the other 20% interest in OES.

The OES Group's activities are principally performed through OES in Australia.

OES has the following controlled entities:

- Proversity.org Limited (Construct) domiciled in the United Kingdom which has a subsidiary in the United States and a branch in South Africa
- Gradability Pty Ltd (Gradability) domiciled in Australia; and
- Two small subsidiaries based in the UK, Online Education Services Limited (OES Ltd) and The Interactive Design Institute Limited (IDI).

Our operations

OES provides online higher education courses and services to students in partnership with universities in Australia and New Zealand. OES employs more than 500 people, professional staff for office-based management and administration roles. OES also engages approximately 1,000 active, part time sessional academic tutors. All employees of OES, including tutors are located in Australia.

Construct produces digital content for higher education and directly employs approximately 200 professional office-based employees in South Africa, the United Kingdom and the United States.

Gradability is Australia's largest dedicated graduate employability specialist. Gradability employs approximately 80 people across professional staff, for office-based management and administration roles, and trainers providing online and in-person skills training for students and recent graduates directly relating to employability.

OES's UK subsidiaries (OES Ltd and IDI) employ approximately 30 people based in the UK across professional staff, for office-based management and administration roles, and active sessional academic tutors.

Our supply chain

The OES Group has worked with over 2,000¹ suppliers in FY2024 with a total estimated spend with suppliers of approximately \$75m.

As a predominantly online business, the OES Group's principal categories of spend are technology (software and support services), business services and marketing. During FY2024, these categories of expenditure represented approximately 79% of the OES Group's expenditure with suppliers.

¹ This includes approximately 1.7k placements providers engaged as part of students' study.

Modern slavery risks

Operations

Due to the nature of OES Group's services, its predominantly online mode of delivery and the direct employment of skilled workers and academics that contribute the Group's services, we consider the inherent risk of modern slavery practices within our operations is low.

Supply chains

Tier 1 suppliers

Direct suppliers in the OES Group's principal categories of spend tend to have a low inherent risk of modern slavery and relatively well-advanced controls. As a result, the OES Group's direct suppliers have relatively low modern slavery risk.

The OES Group engages with some suppliers that have elevated modern slavery risk, due to the industries and locations in which they operate.

- **Industries:** there is potential for the OES Group to contribute to modern slavery through cleaning services and hospitality suppliers.
- **Locations:** countries with higher risk of modern slavery where the OES Group directly engages suppliers including South Africa.

Tier 2 suppliers and beyond

The OES Group recognises that even when engaging directly with suppliers considered low risk for modern slavery, risks can exist in the direct suppliers' supply chains (secondary levels of supply chain).

Risk assessment process & controls

Operations

OES

OES employs more than 500 people, professional staff for office-based management and administration roles. OES also engages approximately 1,000 active, part time sessional academic tutors. All employees of OES, including tutors are located in Australia. OES considers its processes to be effective in mitigation modern slavery risk for its employees but is committed to continuous review and improvement.

Construct

Construct has people intensive operations which are delivered primarily by a team of employees located in South Africa; with the others are located in the United States and United Kingdom. Given the nature of the business, other than temporary contractors, Construct does not have a material supply chain. Construct is compliant with local legislation that regulates aspects such as minimum wage, employment conditions and employee health and safety, and OES has visibility of Construct's remuneration policy. OES considers its processes to be effective in mitigation modern slavery risk for its employees but is committed to continuous review and improvement.

Gradability

Gradability has people intensive operations which are delivered by a team based in Australia and supported by 12 full time professional staff on contract in Fiji. The contractors in Fiji receive remuneration and benefits in excess of local Fijian award rates. OES's People & Culture team support Gradability, and OES has visibility of Gradability's remuneration policy. OES considers its processes to be effective in mitigation modern slavery risk for its employees and contractors, however, is committed to continuous review and improvement.

Supply chains

Below is a summary of the process undertaken by the OES Group to assess supply chain risk and subsequent actions.

Step 1: Analysing suppliers

OES partnered with a third-party platform, Fair Supply, in FY2024 to conduct modern slavery risk analysis on OES's suppliers. The analysis is based on a range of risk factors, including the country where the supplier is located, supplier industry and the type of goods or services purchased.

About Fair Supply

Fair Supply is an Australian based ESG risk management and compliance platform.

Fair Supply's supply chain risk analysis is performed using supply chain data from 190 countries and in relation to more than 15,000 industry sectors. Risk is quantified using a range of economic and human rights standards including:

The United Nations' System of National Accounts; the Walk Free Global Slavery Index and International Labour Organisation Global Estimates of Modern Slavery.

The results of this process, and OES's spend data, are used to quantify the estimated number of people in forced labour per million dollars spent with each supplier, as well as a modern slavery risk profile down to tier 10 of the supply chain.

An elevated risk supplier means a supplier that has high or medium-high inherent risk of modern slavery taking place in its operations or supply chains.

Step 2: Further analysis (as required)

If any supplier is initially identified as having an elevated risk, further desktop research/analysis and internal enquiries are undertaken to ascertain the extent of the risk. If an elevated risk remains with a supplier, then a Modern Slavery Assessment (questionnaire) would be sent to the supplier. The questionnaire focuses on operations, particularly employment practices and the suppliers own supply chains. The questionnaire is in a Yes/No format, providing a score out of 12 (0 = no identifiable risk and 12 = maximum risk).

OES recognises that modern slavery risks exist in the secondary levels of its supply chain. OES has sought to address this risk by requiring large suppliers (>\$25k) to complete a Supplier Code of Conduct. This has been in place for OES throughout FY2024 and was rolled out to Construct's suppliers in calendar year 2024.

Step 3: Working with suppliers to improve processes and controls

Where necessary, OES will take additional steps to work with suppliers to help them improve their processes and controls to reduce the risk of modern slavery in their supply chain.

Governance, consultation and collaboration

OES has in place corporate governance practices which are formally embodied in corporate governance policies and codes adopted by OES's Board of Directors. The aim of the policies is to ensure that OES is effectively directed and managed, that risks are identified, monitored and assessed, and appropriate disclosures are made.

OES's Audit and Risk Committee (ARC) assists the Board in fulfilling its corporate governance and oversight responsibilities in relation to OES's financial and non-financial risk management systems.

Modern slavery mitigation is a key aspect of the 'Social' component of Environment, Social & Governance (ESG). Key members of the OES Executive team are actively involved in reviewing and enhancing the OES Group's policies, procedures, governance and reporting on modern slavery.

Key members of the Executive team were briefed in preparation for this Statement.

The Board of OES monitors the OES Group's modern slavery risk and approves this Statement.

The Chief Financial Officer at OES is accountable for the modern slavery risk analysis, management and reporting.

Policies and procedures

OES has a number of policies and procedures in place to ensure strong governance frameworks that enable OES to assess and address modern slavery risks. These include:

- **Code of Conduct** that sets out expectations for honest, ethical and accountable conduct standards by which all directors, employees and contractors of OES are required to abide;
- **Whistleblower Protection Policy** that supports and encourages employees, contractors and suppliers to raise concerns anonymously regarding improper behaviour at OES, including conduct relating to modern slavery; and
- **Anti-Bribery and Corruption Policy** that reinforces our commitment to high ethical and socially responsible standards in our procurement practices.

- **Training** on these core policies is mandatory for all employees both at induction and every two years.

Consultation with OES's controlled entities

Modern slavery programs of work are managed across the OES Group. Consultation occurs across OES controlled entities and across functions including Procurement, Finance & Risk and operational areas.

The OES head office team in Melbourne consults with senior management and relevant employees at its owned and controlled business. These businesses have their own procurement, and finance functions and work with OES to develop oversight of their modern slavery risks.

Collaboration and engagement with external parties

OES is committed to working with and learning from suppliers, peer companies and the community to continuously improve its understanding of modern slavery risks, controls and the evolving external environment.

Assessing our effectiveness

Assessing OES Group's operations

Due to the nature of OES Group's services, its predominantly online mode of delivery and the direct employment of skilled workers and academics that contribute the Group's services, and the controls in place through OES having visibility over the remuneration policy for labour force engagement, we consider the controls effective and the inherent risk of modern slavery practices within our operations is low.

Assessing OES Group's supply chain risk

During FY2024, OES used the Fair Supply platform to assess 170 suppliers for modern slavery risk with a total spend of \$60.2m. This equated to 80% of the OES Group's total supplier spend.

A summary of the risk profile is provided below:

Risk Profile	Number of Companies	Total Spend (\$m)
Moderate	5	\$0.3m
Moderate Low	7	\$0.3m
Low	158	\$59.6m
	170	\$60.2m

Moderate & Moderate Low Risk Profile

In FY2024, OES Group had 12 suppliers with an aggregate spend of approximately \$0.6m which were identified as having Moderate or Moderate Low risk.

Five of these suppliers, equating to approximately \$0.3m of spend, have their own publicly available Modern Slavery Statements or Supplier Codes of Conduct which address their desire to reduce the risk of modern slavery in their supply chains.

Of the remaining seven suppliers, equating to \$0.3m of spend:

- One was an IT hardware vendor which is no longer engaged by the OES Group.
- One is an IT hardware vendor which that has confirmed commitment to comply with the OES Group’s Supplier Code of Conduct.
- Two are suppliers which have been sent the OES Group’s Supplier Code of Conduct, to which OES Management are following up to seek their commitment to comply.
- The three suppliers have been assessed by Management and deemed to be of lower inherent risk.

Based on the assessment performed, the inherent risk in the OES Group’s supplier engagements was deemed low.

Internal Assessment of Cleaning Suppliers

OES Management is aware that heightened modern slavery risk exists in industry segments such as office cleaning services. While these were not flagged as greater risk via our Fair Supply assessment, OES Management undertook a review of the cleaning suppliers across the OES Group:

- **OES Melbourne:** The Melbourne head office is the largest property in the OES Group. OES shares this premise with SEEK Limited that has undertaken detailed audits and, where necessary, taken steps to improve its cleaning suppliers' processes across its various locations.
- **Gradability Campuses:** Gradability engages well-known corporate cleaning suppliers in each of its campuses, contracted by its landlords.
- **Construct Cape Town:** Construct rents an office premises in Cape Town. Construct's premises are cleaned by an employee that is paid in excess of the applicable award wage and conditions.
- **Premised leased by the OES Group in the UK:** These premises are cleaned by commercial cleaning companies that either have publicly disclosed Modern Slavery policies or are a Living Wage Foundation Recognised Service Provider.

Based on the review performed, and the assessment with Fair Supply, the inherent risk in the OES Group's cleaning services engagements was deemed low.

Improvements made to OES's supply chain processes

OES is committed to continuously enhancing its existing processes and developing new ones to effectively manage modern slavery risk. During FY2024, OES improved its supply chain due diligence processes by:

- Transitioning to a new third-party platform (Fair Supply) to conduct modern slavery analysis;
- Commencing the process to roll-out a Supplier Code of Conduct to larger suppliers (>\$25k spend) that are engaged by Construct; and
- Undertaking more detail modern slavery analysis and assessments on cleaning services providers.

Outlook

OES Management will continue to build upon the procedures adopted in FY2024 as the group continues its journey to understand and mitigate the risks of modern slavery in our operations, including our supply chain, we are committed to:

- Annually reviewing OES's modern slavery risks (including its detailed supply chain analysis).
- Keeping abreast of initiatives and practices undertaken by other comparable entities.
- Considering the need to expand due diligence of indirect (tier 2) suppliers; and
- Implementing continuous improvement to increase the effectiveness of OES's modern slavery prevention practices.

Approval of the Modern Slavery Statement

This Statement was approved by the Board of OES in their capacity as principal governing body of Online Education Services Pty Ltd on 6 December 2024.



Wendy Thorpe
Chairperson