



# Modern Slavery Statement 2024



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# 1.

## MEGT commitment statement

MEGT will not tolerate any form of modern slavery in its operations or supply chain. The business is fully committed to operating responsibly, while establishing and adhering to the highest ethical standards.

This statement is made in accordance with the Australian Modern Slavery Act 2018 (Cth) (the Act) and is relevant to the reporting period ending 30 June 2024. It describes the steps and approaches taken during FY24 to identify and minimise risks of exposure to modern slavery across the organisation and its supply chain.

# 2.

## MEGT business structure

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

As at 30 June 2024, the entities associated with MEGT are:

- MEGT Services Pty Ltd
- Australian Business Colleges Pty Ltd
- Australasian Training Consultancy Pty Ltd

Only MEGT (Australia) Ltd and MEGT Services Pty Ltd operated during the financial year and are affected by the provisions of the Act.

# 3.

## About MEGT

With over 40 years supporting the Vocational Education and Training (VET) sector, MEGT has significantly influenced the Australian workforce, supporting 1.5 million individuals and collaborating with over 250,000 businesses since 1982. As Australia's largest single Apprentice Connect Provider, MEGT delivers Australian Apprenticeship Support Services for the Department of Employment and Workplace Relations (DEWR).

Our commitment to social equity is exemplified through Employment Services for disadvantaged job seekers, including programs for First Nations people and initiatives like Workforce Australia and Transition to Work. In 2021, we established the MEGT Foundation, offering scholarships up to \$15,000 annually to assist disadvantaged women in furthering their education and careers.

With head office based in Ringwood Victoria, MEGT operates over 50 locations nationwide, employing 600 team members. MEGT is dedicated to producing high-quality, work-ready candidates. We have helped more than 700,000 Australian Apprentices complete their qualifications since 1998, in partnership with over 900 Registered Training Organisations, and supported 8,000 individuals with disabilities into employment since 2022.



## 3.1 Mission, Vision and Values

### Mission:

To build a world class employment and learning solutions organisation through organic growth, targeted acquisitions, innovative products, leading technology and high performing talent, delivering an unmatched customer experience.

### Vision:

Life changing, lifelong learning and employment for all.

### Values:



**United** – Achieving greatness together



**Savvy** – Smart choices, smarter outcomes



**Trailblazers** – Pushing boundaries in pursuit of excellence

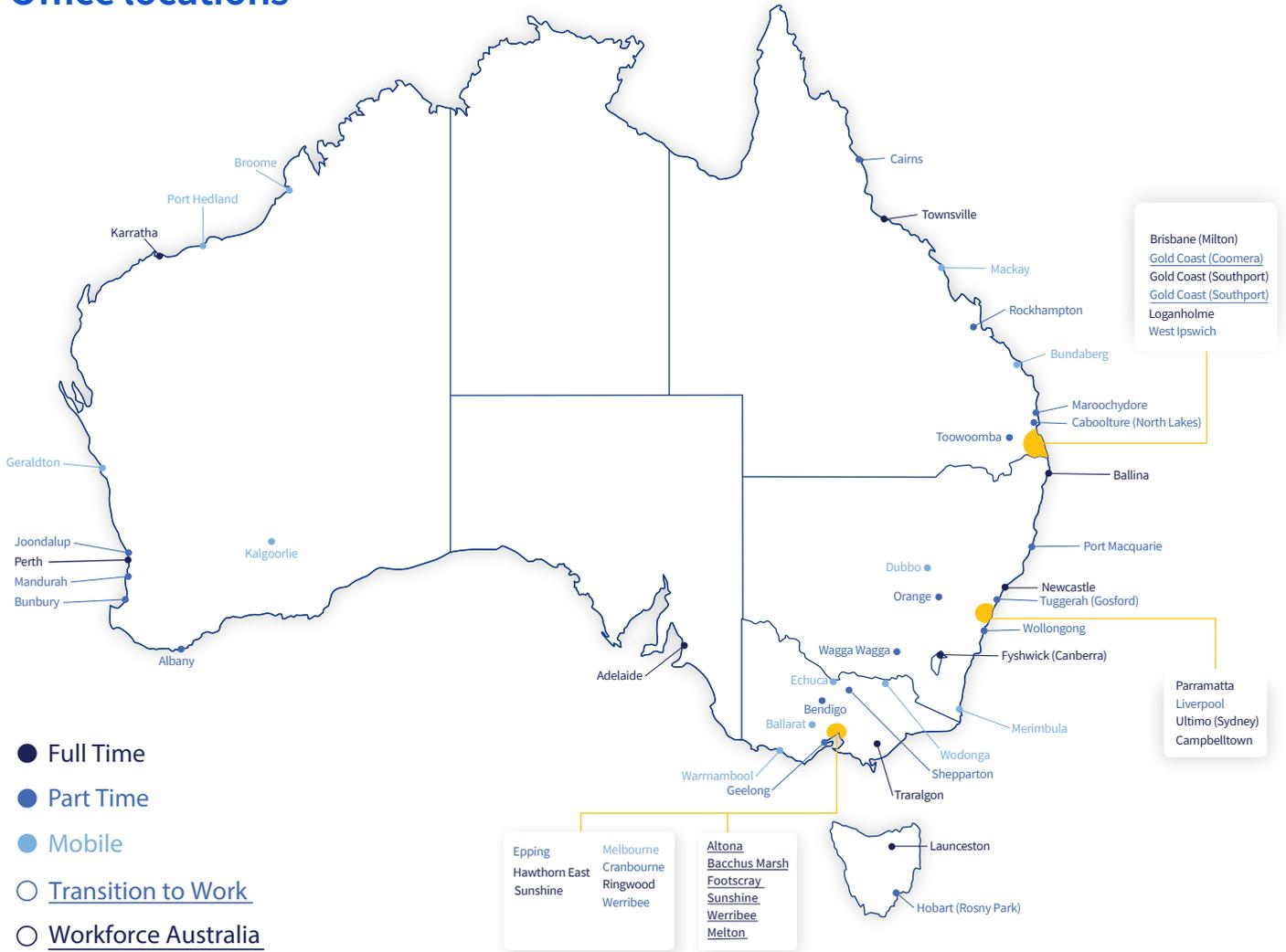


**Thrive** – Success, growth and wellbeing

# 3.2 Where we are

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

## Office locations



## 3.3 What we do



### Service Guide

- MEGT is a Group Training Organisation (GTO) which employs apprentices and trainees and places them 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 off-site training to complement the apprentice or trainee's practical experience
- For apprentices or trainees engaged directly by employers, the Apprentice Connect Provider administers the Training Contract and provides ongoing support
- Employment Services, via Workforce Australia (WFA) service offerings and state-based contracts, offers a range of programs including *I Got Brushed*, *I Got Built*, *I Construct*, *Built by Jill*, *Empowering Pathways into Aged Care*, *SA Test a Trade*, *Aged Care Potential* and more
- The Transition to Work (TtW) program assists 15-24 year-olds seeking employment and upskilling opportunities and who are unregistered with other services

At MEGT, we are dedicated to empowering communities by enhancing access to local career and development opportunities. Our primary mission is to provide high-quality employment solutions tailored to the needs of all Australians. We support businesses, apprentices, and trainees by maximising the benefits of the Australian Apprenticeship Support Services. As of 2024, our services include:

### Recruitment and Management Services (RMS)

Our comprehensive Recruitment Management Services (RMS) are designed to help employers effectively streamline the recruitment and management of apprentices and trainees, ensuring these individuals thrive both in their careers and educational pursuits. Our services include:

- **Group Training Organisation (GTO):** We specialise in the recruitment, employment, and mentoring of apprentices and trainees, facilitating their work at our host employer client sites through a flexible on-hire arrangement
- **Managed services (recruit and guide):** We take charge of recruiting new staff and managing their training plans, while also providing mentorship for the apprentices and trainees engaged by our clients
- **Managed services (guide only):** We focus on managing the training plans and mentorship for apprentices and trainees employed by our clients, ensuring their development is aligned with both educational and career goals
- **People NOW (labour hire):** We supply qualified workers as part of our clients' contingent workforce, helping them meet their staffing needs efficiently

### Apprentice Connect Provider

We are Australia's single largest Apprentice Connect Provider contracted by the Department of Employment and Workplace Relations (DEWR) to provide Australian Apprenticeship Support Services.

- Sign-up and registration of apprentices and trainees
- Assistance with government financial incentives which may be available
- Accurate and efficient processing of Training Contracts and incentive claim forms
- Access to a 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 also offers:

**Youth Employment Programs:** We assist approximately 4,000 participants through our Workforce Australia programs, including the “Transition to Work” initiative, primarily based in Western Melbourne and the Gold Coast

**State-Based Employment Initiatives:** Our services aim to provide employment and educational pathways for all Australians, with a focus on empowering First Nations communities through tailored training and employment opportunities

**Support for school leavers with disabilities:** Through the National Disability Insurance Scheme (NDIS) and School Leavers Employment Services (SLES), we offer essential employment support for school leavers with disabilities including ongoing mentoring and help with finding external services

## Group Training Organisation

As a registered 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 GTO service offering, ‘People NOW’, is a fully managed, tailored and flexible labour solution to meet both short and long-term workforce requirements. It simplifies recruitment and staffing by providing:

- Comprehensive workforce planning, skills gap analysis and budget considerations
- Sourcing, screening and onboarding the highest quality candidates
- Ongoing management of work performance, health and safety and training requirement
- Payroll, administration and reporting
- Overall management of one or more worksites



# 4.

## Approach to governance

The MEGT Board comprises five directors (including Chair), with all being independent Non-Executive Directors. The Board is responsible for monitoring the strategic direction of MEGT and ensuring 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 responsibilities with regards to the issue of modern slavery has been assigned to the Senior Management and Executive team and is formally directed by the Remuneration and Governance 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, the safety, quality, and performance of our services are reviewed through a prism of risk-based analyses to continuously improve.

MEGT holds ISO27001 certification and three of its divisions hold ISO 9001 certification. Both certifications 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 accreditation for the protection of information and data collected and stored as part of the administration of its programs. This includes programs delivered with the assistance of external service providers.

MEGT is a certified Social Enterprise under Social Traders, Australia's only social enterprise certification body. As such our government stakeholders have the assurance that we create genuine social impact and confidence that their contracts with us contribute to a fairer and more equitable Australia.

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 Committee meets quarterly 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 in line with our procedures, 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.

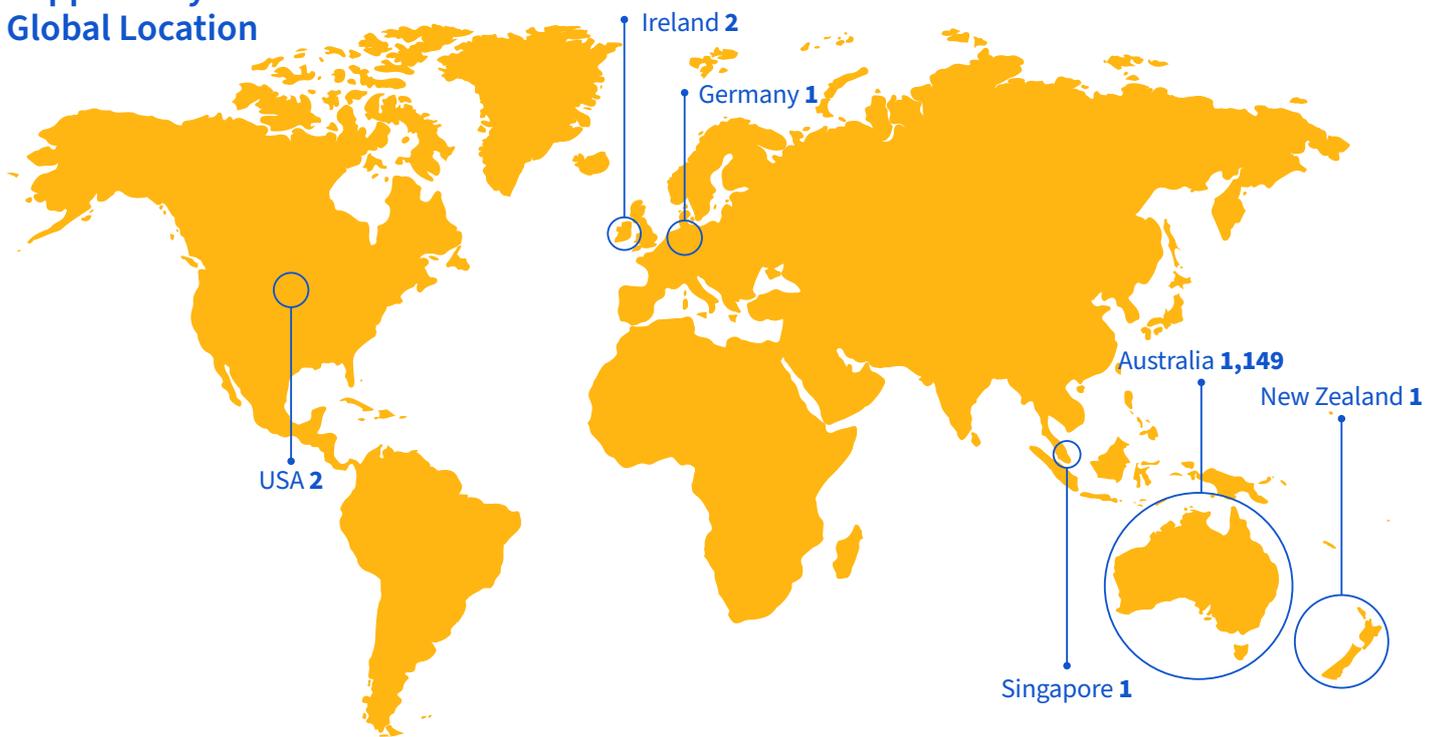


# 5.

## Operations and supply chain

In 2024, MEGT procured goods and services from 1,156 creditor supply entities, 1,149 of which are Australian-based and seven which are based overseas. All overseas suppliers are technology companies providing software-related services.

### Suppliers by Global Location



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

### Corporate and operational procurements

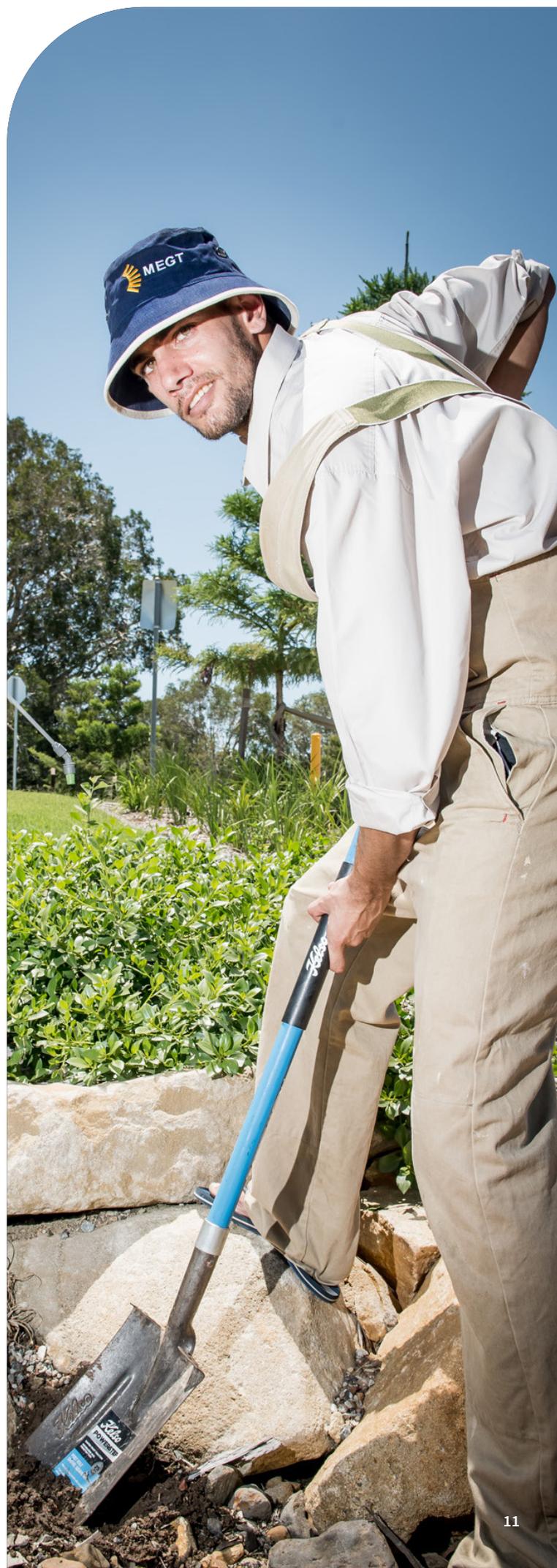
These are goods and services which enable and support the day-to-day operation of the business and delivery of services. This includes property and occupancy costs, motor vehicle running costs, information technology, uniforms, cleaning, trade-related tools as used by our apprentices and trainees, and various other office-related expenses.

## Capital spends

These include motor vehicles, leasehold fit outs, furniture and fittings and other IT-related capital expenditure.

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

Supply category	% of total spend
Office expenses	17.33%
Consultancy	11.77%
Computer expenses	11.68%
Motor vehicle expenses	10.62%
Office rental	9.91%
Superannuation	5.39%
Training and conferences	5.28%
Telecommunications	5.05%
Advertising and promotions	4.82%
Workcare medical expenses	4.00%
Equipment and building maintenance	2.65%
Payroll creditors	2.45%
TAFE fees	2.34%
Travel and accommodation	1.85%
Office cleaning	1.12%
Membership fees	0.90%
Protective clothing	0.60%
Expense reimbursement	0.46%
Legal costs	0.46%
Electricity	0.46%
Photocopying	0.41%
Group Tax	0.17%
Postage	0.12%
Debt recovery costs	0.06%
Consultant fees	0.06%
Institute creditors	0.04%
	<b>100%</b>



# 6.

## Identifying modern slavery risks

During 2024, MEGT carried out a high-level risk assessment of its key suppliers using the guidance from the Department of Home Affairs and the underlying principles as set out by the United Nations Office of the High Commissioner for Human Rights (OHCHR) and The Organisation for Economic Co-operation and Development (OECD).

### 6.1 Operations

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

- Investing in a professional People & Culture team which strives to create and provide working conditions that not only meet minimum standards but exceed them
- Promoting a culture of equality, diversity, unity, understanding and respect for all

The principles under which we operate are:

1. Working under specific industry awards and enterprise agreements which meet the National Employment Standards set out by Fair Work Australia
2. The Australian Human Rights principles of dignity, equality and mutual respect which are embedded in our:
  - Code of Conduct
  - Equal Opportunity and Diversity Policy
  - Anti-Bullying Policy and Procedure
  - Recruitment and Selection Policy and Procedure
  - Unacceptable Workplace Behaviour 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:
  - Equality and Inclusive Behaviours Policy
  - Reconciliation Action Plan (RAP)
  - Disability Inclusion Action Plan
5. MEGT is compliant with gender reporting under the Workplace Gender Equality Act 2012 (Cth)
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.

### 6.2 Supply chain

MEGT is a service-oriented organisation. We do not acquire any raw materials or component parts for product manufacturing, nor do we maintain an inventory for resale. The 'indirect' goods and services we obtain are essential for supporting and sustaining our business operations.

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

## Geographic risk

The overwhelming majority of our suppliers are based in Australia. We believe these suppliers face a reduced risk of modern slavery in their operations, as they adhere to Australian laws and regulations and function within a society and business environment that firmly denounces modern slavery practices.

According to the [globalslaveryindex.org](https://www.globallabourindex.org) publication, there is a reduced risk due to the nature of the industry in which we operate (professional services). We do, however, acknowledge the inherent risks of modern slavery in some of the countries where we have conducted business and that such risks exist in the following areas:

- Forced labour
- Migrant labour exploitation
- Excessive hours of work

These risks abated over previous reporting periods with the divestment of MEGT's education group business units.

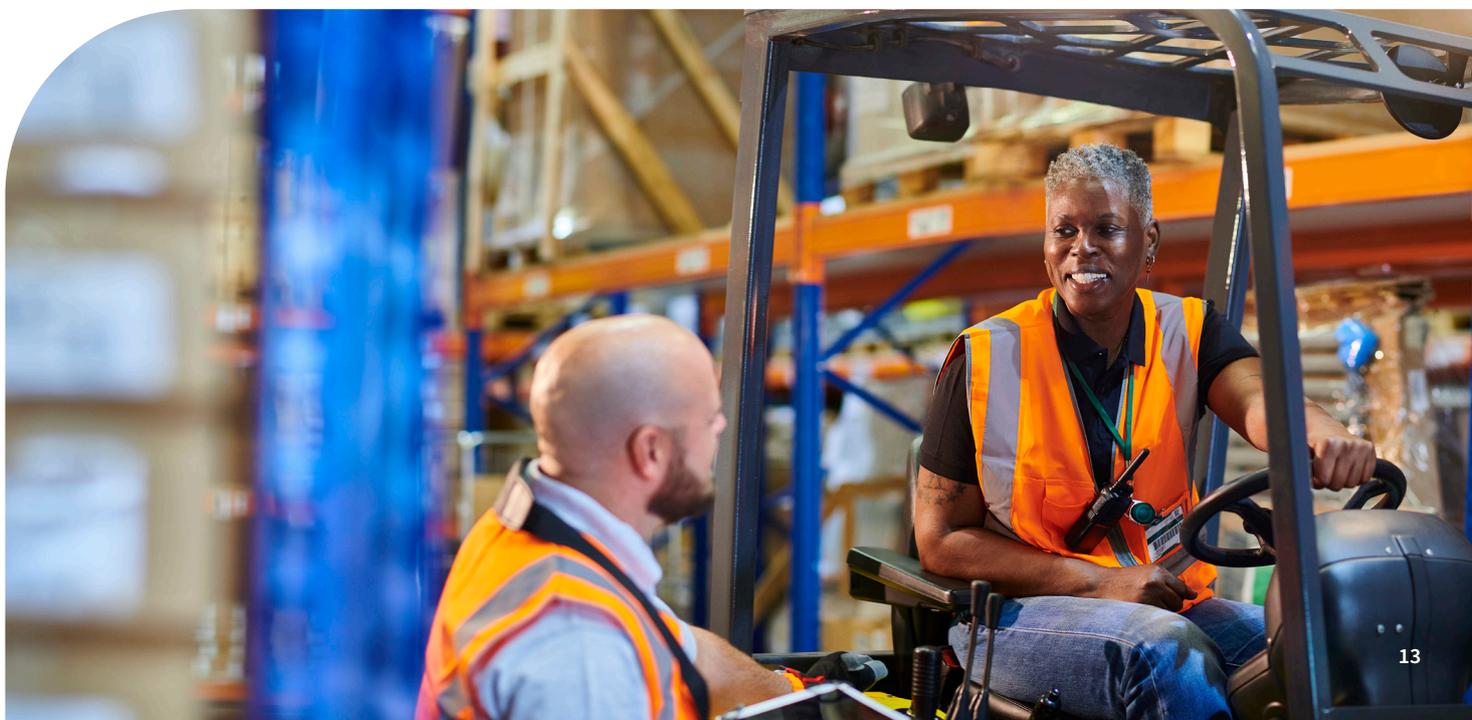
## Product, services and industry risk

Given that our organisational relationships encompass hundreds of entities within our supply chain, some of which we do not have direct contractual ties with, there are potential risks that MEGT's activities could be linked to modern slavery through the supply chains of our suppliers.

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 engage labour hire. This becomes increasingly difficult for MEGT to control when there is no clear line-of-sight over who is providing the end service.

By utilising the vulnerability model from the Global Slavery Index, MEGT has found that several suppliers source materials from countries identified as high-risk, which are more prone to modern slavery practices. Some examples within our organisation include:

- Construction and building materials utilised for office repairs and fittings
- Technology, encompassing both hardware and software
- Catering and food products, including tea and coffee
- Textile goods, such as protective workwear and corporate apparel
- Motor vehicles and their component parts



# 7.

## Actions taken to address identified risks

MEGT is committed to acting ethically and with integrity in all 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 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.

### 7.1 Developing staff in key roles

#### Compliance

MEGT has embedded the role of Senior Compliance Manager to establish a business-wide framework for the unification and maintenance of company policies and procedures. The remit of this roles includes:

- Privacy
- Risk
- Audit
- Accreditations and certifications

The role supports MEGT's governance obligations and manages our Policy and Procedure Hub. Accessibility to related legislation is available to staff via the MEGT Compliance site located on the business' intranet.

#### Procurement

The established role of Procurement and Contracts Manager guides and assists staff and departments through the process of planning purchases, conducting go-to-market events, entering supply agreements with service providers, and managing them. In support of this, the MEGT Procurement intranet site is now embedded as a key resource for staff delegated to engage the supply chain.

A key feature of the site is the Modern Slavery information page containing the definition of modern slavery and the eight types of serious exploitation - trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services, and the worst forms of child labour.

Information relating to modern slavery risk in MEGT's Operations and Supply Chain is also featured with links to:

- The Act
- The Modern Slavery Register
- MEGT's current and past Modern Slavery Statements
- Supplier Modern Slavery Questionnaire

## People and Culture

MEGT has full time Learning and Engagement (L&E) staff in place who manage staff inductions and ongoing training via a comprehensive multi-module learning programme. This includes educating members of the cohort which is authorised to source goods and services from external suppliers about their roles and responsibilities under the Act. To this end, in 2024 our L&E staff developed and included additional supply chain related material into our interactive modern slavery staff training course.

## 7.2 Building our understanding and capability

MEGT has implemented measures to guarantee that we have a knowledgeable and competent team making decisions regarding the engagement and management of our supply chain relationships. Our educational initiatives also reach the broader workforce, raising awareness and broadening our efforts across the organisation to detect potential instances of modern slavery.

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 module emphasises that modern slavery is a serious crime where individuals are subject to exploitative work practices that are a violation of human rights. It has three learning objectives:

- Define modern slavery
- Explain the various forms of modern slavery
- Describe the impact modern slavery has on a business

The course is designed to help those in leadership, management and risk management roles who are involved in identifying, assessing, and addressing modern slavery risks. It also defines modern slavery within MEGT's operations and supply chains. The 'Combatting Modern Slavery' module also:

- 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 risk
- Trains staff to identify signs of people suffering from modern slavery
- Trains relevant staff in the specifics of modern slavery risk in the supply chain
- Outlines the consequences of modern slavery for an organisation
- Provides an overview of the Act and reporting requirements

## 7.3 Improving policy and procedures

In this statement, MEGT has highlighted policies and procedures to ensure we address our corporate, social, and legal responsibilities. These documents are regularly reviewed and 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 which our staff are expected to exhibit.



## 7.4 Engagement with suppliers

Our main resources for managing modern slavery risks in the supply chain are our employees' skills and experience, along with our internal controls. Below are MEGT's key initiatives for engaging with suppliers:

- Our Procurement Framework enhances visibility into suppliers and the contract life cycle, ensuring they adhere to responsible practices and comply with the Act as required for Federal Government contractors
- When establishing a new supplier as a creditor in our finance system, we complete a New Creditor Information Sheet, collecting necessary business details and confirming their modern slavery compliance
- Our Contractor Induction Process includes a supplier questionnaire, 'Identifying Modern Slavery Risks,' for both low and high-risk suppliers, ensuring they assess their own supply chains for potential exposure to modern slavery risks
- MEGT limits the number of Executives and senior managers authorised to enter new supply arrangements on behalf of the business. These skilled negotiators have the ability and focus on identifying risks, including the potential for modern slavery
- With operations since 1982, our long-standing relationships with suppliers facilitate the diligent identification of potential unlawful behaviour
- MEGT conducts all transactions electronically with proper tax invoices, and never deals in cash, which enhances transparency and reduces the risk of potential exploitation linked to cash payments

## 7.5 Remediation process

MEGT's operations and supply chains remain largely unchanged from the previous reporting period, as does the risk of exposure to modern slavery practices. Understanding that ongoing diligence is required, we will continue growing our capability to identify risks and ensure our commitment to protecting the human rights of people in our operations and supply chain.

The following steps remain in place in the event action is required to rectify modern slavery:

- All reported instances of 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
- Immediately terminate any contract or supply arrangement where the supplier is deemed to have acted in breach of their obligations under the Act

Addressing modern slavery risks for global eradication starts with the individual. In addition to organisational measures, MEGT expects employees to understand and follow relevant laws and policies, proactively mitigate risks in their areas, and report any instances for prompt organisational attention

## 7.6 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 Committee. The committee will continue to report and provide recommendations for action and change to the Executive team for consideration and approval to be implemented.

# 8.

## Looking ahead

MEGT has a zero-tolerance approach to modern slavery and remains committed to tackling the issue in its operations and supply chain. We are further committed as a business, from the Board of Directors, Executive team and all other employees, to implementing the actions and processes necessary for the continuous 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 in future reporting periods to reduce the risk posed by modern slavery internally in our business operations and in our external supply chain:

- Capture and investigate any reported incidents of modern slavery in our operations and supply chain and address any recurring risks
- Continue to undertake modern slavery awareness training for leadership, management, procurement, and risk management personnel involved in identifying and addressing these risks
- Limit authority for supplier engagement and contracting to a select group of Executives and senior managers to minimise risks in our supply chain
- Engage in external professional forums for updates on the administration and application of the Act
- Stay informed about the Federal Government's review of the Act's compliance and be ready to act on developments
- Enhance our procurement framework and governance standards to ensure that suppliers and third-party providers address modern slavery risks effectively

# 9.

## Consultation

This statement was prepared by a working group which leads MEGT's modern slavery compliance initiatives. The group collaborated with business units to develop the document which has been reviewed and endorsed by the Remuneration and Governance Committee prior to submitting for adoption by the Board of MEGT. The MEGT Modern Slavery Statement (2024) has since been approved by the Board of Directors of MEGT (Australia) Ltd.

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



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Peter Moore



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

**13 6963**

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

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