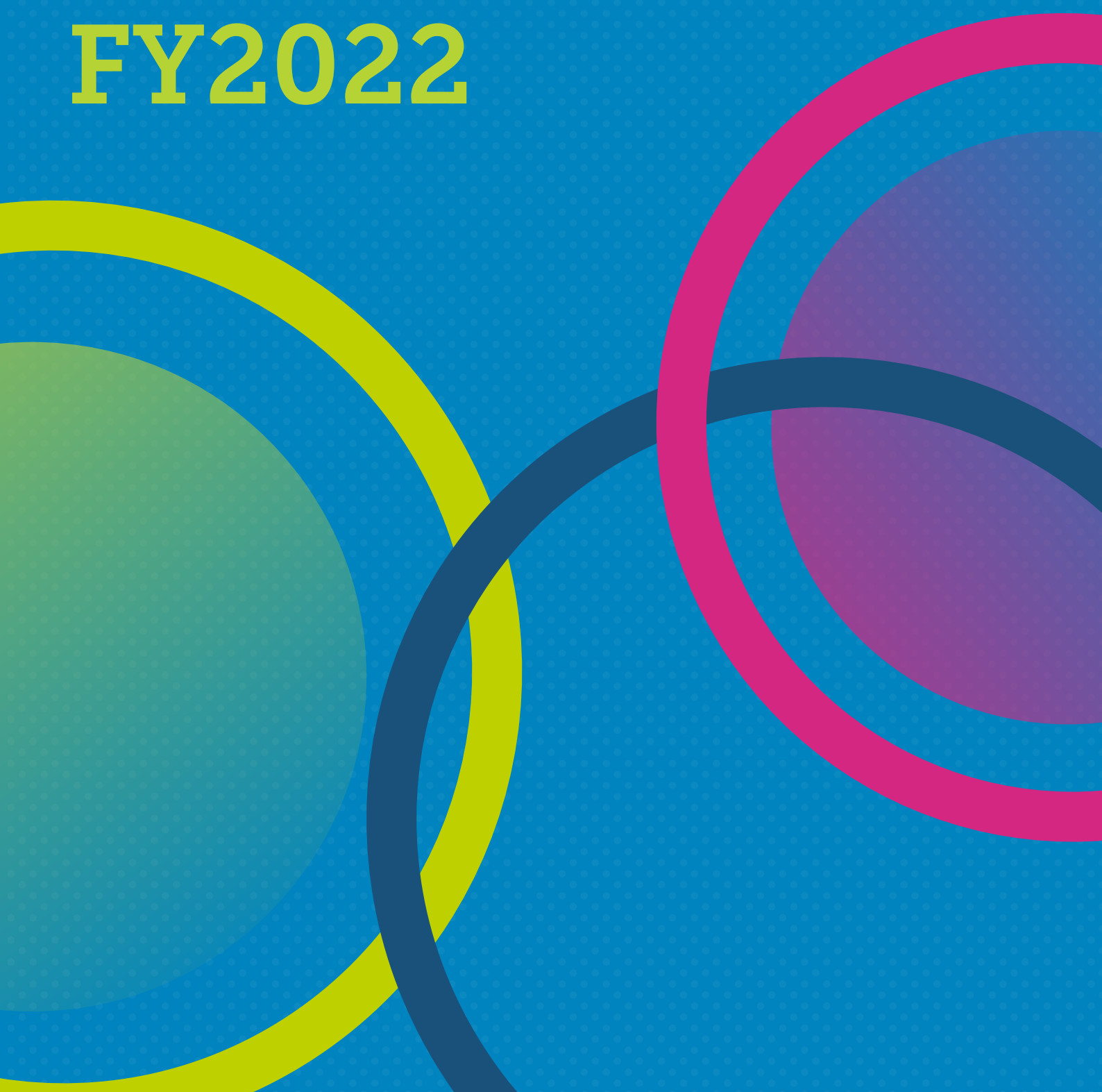


Modern Slavery Statement FY2022

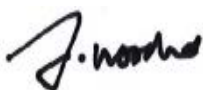




Message from us

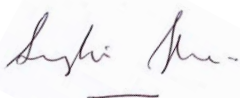
CBLA supports international efforts to prevent modern slavery in businesses and supply chains. Slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour, forced marriage, debt bondage and human trafficking, whether adults or children, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. CBLA has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

With this modern slavery statement, CBLA is strengthening its commitment to sustainability and human rights. We know there is much to do in this space and are committed to reviewing and improving our operations to prevent modern slavery. CBLA acknowledges that this is the first Modern Slavery Statement submission and is committed to continuous learning and improvement for all future submissions.



Francesca Woodward

Chair | On behalf of the Board of Directors of Cambridge
Boxhill Language Assessment Pty Ltd ATF Cambridge
Boxhill Language Assessment Unit Trust



Sujata Stead

Chief Executive Officer

8 December 2022





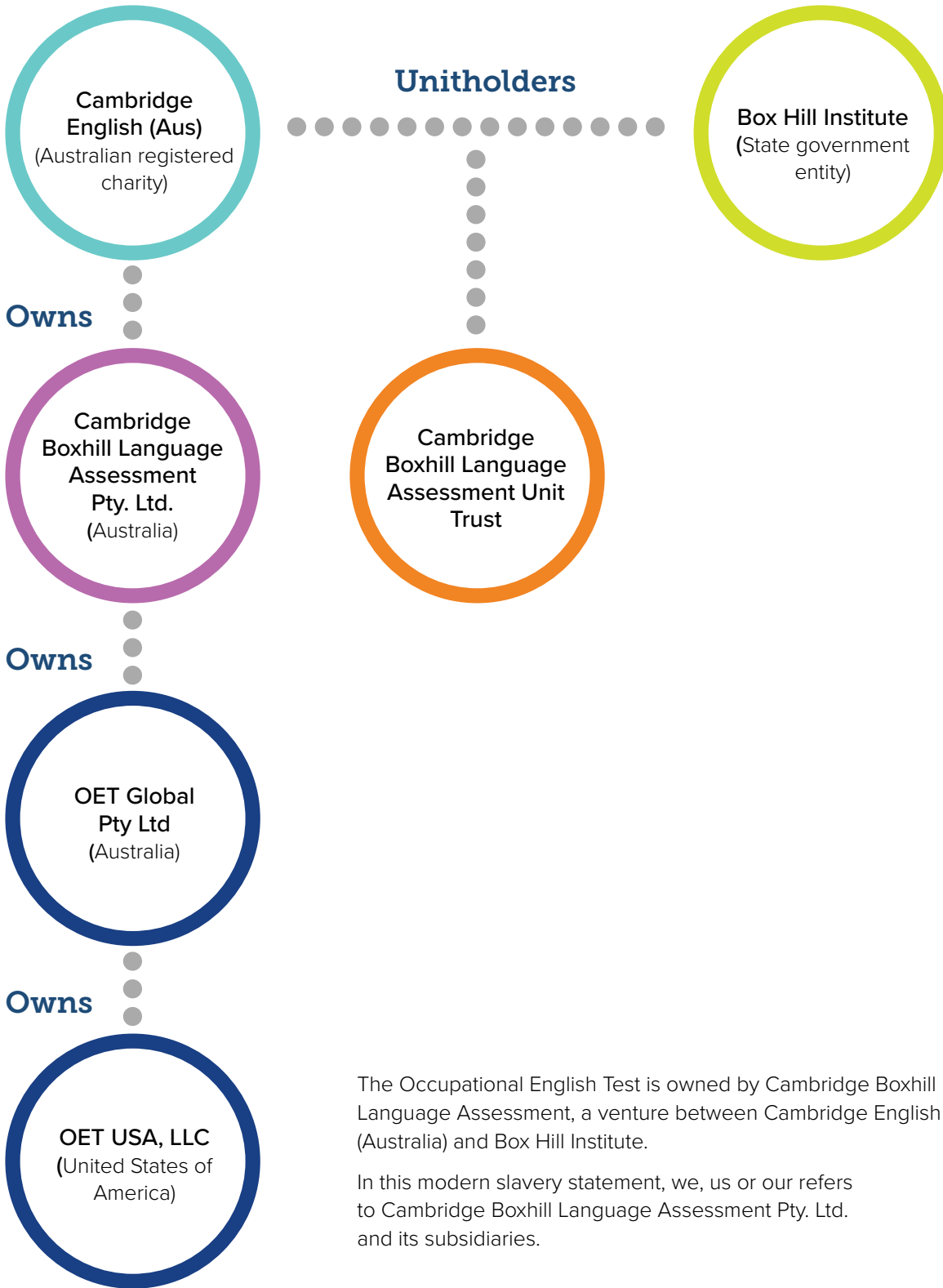
Reporting entity

Name	Cambridge Boxhill Language Assessment Pty Ltd ATF Cambridge Boxhill Language Assessment Unit Trust
ACN	159 885 257
Trading name	Occupational English Test
Entity type	Australian Proprietary Company
Registered office	Level 17, 452 Flinders Street, Melbourne VIC 3000
Place of incorporation	Australia
Status	Registered

This modern slavery statement relates to the 1 August 2021 to 31 July 2022 reporting period for the purposes of the *Modern Slavery Act 2018* (Cth) in Australia and *Modern Slavery Act 2015* in the United Kingdom. In preparing this modern slavery statement, we engaged an external law firm to conduct an independent review of our existing modern slavery processes and controls and conduct a gap analysis.



Our structure



The Occupational English Test is owned by Cambridge Boxhill Language Assessment, a venture between Cambridge English (Australia) and Box Hill Institute.

In this modern slavery statement, we, us or our refers to Cambridge Boxhill Language Assessment Pty. Ltd. and its subsidiaries.

Our operations

We are a global business that delivers the Occupational English Test and related services to healthcare professionals. The **Occupational English Test or OET** is a high stakes English proficiency test that is administered in over 60 countries and recognised by healthcare boards and councils in Australia, New Zealand, the United Kingdom, the United States of America, Ireland, Dubai, Singapore and more. There are three forms of the OET: OET on Computer at a test venue, OET@Home™ (on Computer) and, OET on Paper at a test venue.

Our service offering primarily relates to:

- OET delivery and administration
- OET preparation support

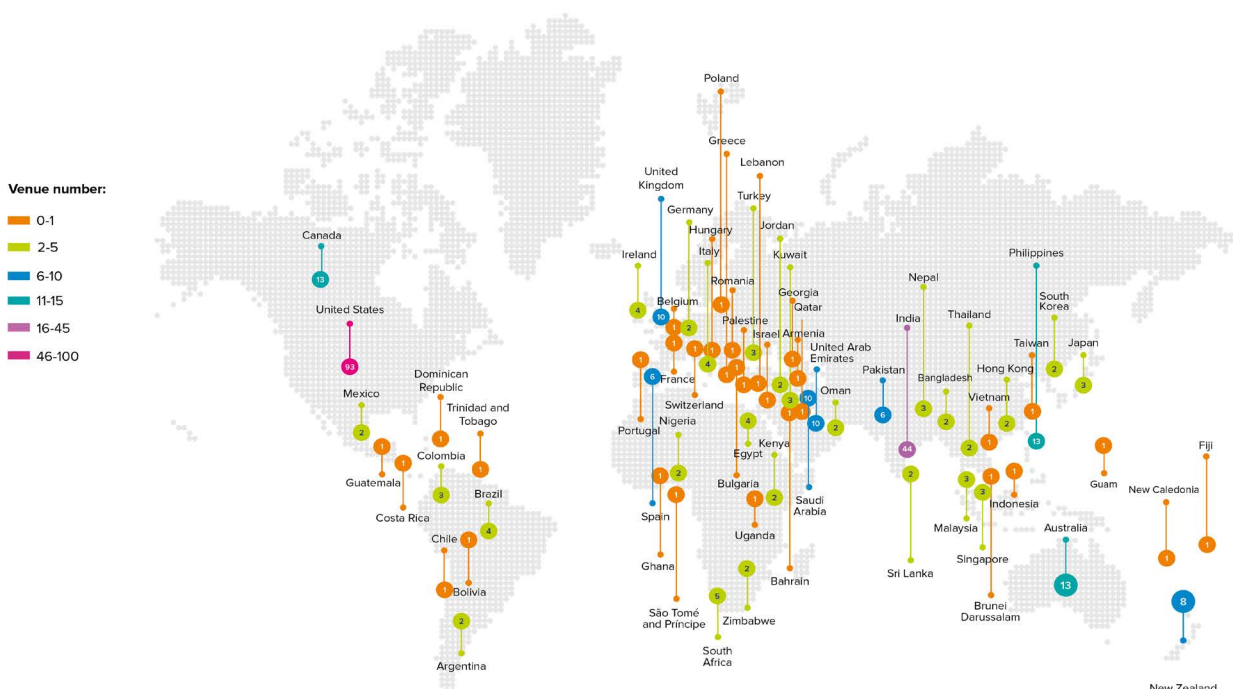
Our head office is in Victoria, Australia. We have 127 employees in Australia and five employees in the USA. From time to time, via a services agreement Cambridge University Press & Assessment employs individuals to work within our operations internationally.

Our supply chains

We have an extensive network of suppliers who assist us in providing the OET and related services worldwide. Our supply arrangements are ongoing, on a fixed term, or ad hoc for a specific project or task.

Test delivery providers

Test delivery providers are our largest supplier category. They provide venues for us to conduct the OET and help deliver the OET to candidates, including performing the operational processes required on OET test days. A list of our test delivery providers can be found [here](#).



Preparation providers

We have [two types of preparation providers](#) who assist candidates with preparing for the OET:

- 1 **Premium Preparation Providers**, who have successfully completed an OET teaching skills programme and demonstrated high levels of quality in material creation and curriculum planning. We have endorsed them to offer courses with specific entry level requirements and course lengths that provide candidates with the required English language level and skills to reach their targeted OET score. They are permitted to display the OET Premium Preparation Provider logo.
- 2 **Preliminary Preparation Providers**, who have completed a preliminary OET training programme. They have not completed the full OET teaching skills programme but have indicated to us that they meet certain criteria expected of a reputable English language course.

Other suppliers

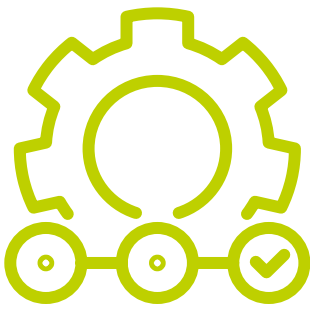
We also have a range of suppliers who provide day-to-day goods and services to us, including office supplies, catering, cleaning and general office maintenance services, printing and scanning, software subscriptions and IT services, labour hire services, content preparation, marking and assessment, design services, brand protection services, and legal, taxation, accounting, audit and consultancy services.

Risks of modern slavery practices

Operations and supply chain

Our internal operations are primarily within Australia. Based on the key risk indicators for modern slavery, we believe the risks of modern slavery practices within our operations and in relation to our Australian-based suppliers are low. There is also a low risk of modern slavery in relation to our local and overseas preparation providers because they are generally well-educated teachers who operate as sole traders or small businesses.

However, there are inherent modern slavery risks associated with a global supply chain, particularly given the countries in which our suppliers operate and their sectors. While we have not identified any specific instances of modern slavery, we recognise that we may be directly linked to the following risks of modern slavery practices due to our relationships with overseas suppliers:



- **Test delivery suppliers** – several of our test delivery providers operate in countries reported by the Global Slavery Index and international labour organisations to have a high prevalence of modern slavery and corruption and/or weak rule of law, including India, Pakistan, Myanmar, Brunei, Thailand, Greece, Philippines and Nigeria. The sector also commonly uses temporary or unskilled labour and short-term contracts in providing services. These factors, together, indicate a modern slavery risk that we will prioritise addressing in our supplier due diligence program.
- **Labour hire** – labour hire providers often use temporary, overseas labour on short-term contracts. Our labour hire providers typically provide services remotely and from overseas, which means there is low visibility into the working conditions of the individuals performing the services.
- **Office supplies** – some of our office supplies are manufactured in countries reported to have a high risk of labour exploitation or typically involve the use of seasonal, temporary, or unskilled labour.
- **Sub-suppliers** – our suppliers procure goods and services from other suppliers (ie sub-suppliers). At this stage, we do not know the identities and business practices of all sub-suppliers, which means there may be modern slavery risks associated with their businesses, as well as the businesses of suppliers further down the supply chain. However, we will seek to address this gap in our supplier due diligence program.

COVID-19 pandemic

The COVID-19 pandemic continued during the financial year. We did not identify any heightened risk of modern slavery arising specifically from the pandemic. This is due to both the continuation of the OET despite government-imposed lockdowns and restrictions and the successful transition to remote work since the pandemic began. We were unable to conduct a planned audit of our occupational health and safety framework during the financial year as our

employees were working remotely for most of the financial year due to lockdowns and government directives. The audit is rescheduled for the next financial year.

Actions taken to assess and address risks



We are committed to doing business ethically and with integrity and have several controls in place to assess and address modern slavery risks that arise within our operations and supply chains. Below are the actions we have taken during the reporting period to assess and address the risks identified above:

- Standard contract templates
- Policies and procedures
- Risk management framework
- Global market risks
- New country entry due diligence
- Regular test delivery partner meetings
- Employee training

Standard contract templates

Given the modern slavery risks we have identified are primarily associated with our supply chain, we have developed standard contract templates that we endeavour to use with suppliers, including test delivery providers, printing and scanning providers, premium preparation providers and IT development suppliers. Those standard contracts contain several important clauses, including the following:

Modern slavery

During the financial year, our standard contracts were updated to require suppliers to:

- Comply with applicable modern slavery laws
- Maintain policies and procedures to ensure compliance with applicable modern slavery laws
- Agree to not utilise slave, prisoner, child or any other form of forced labour in providing services to us
- Notify us if they become aware of these forms of labour in their businesses or the businesses of their subcontractors

Health and safety

Our standard contracts with test delivery providers and premium preparation providers contain comprehensive health and safety requirements. Our Test Delivery Partner Manual supplements our test delivery contracts by prescribing certain test venue conditions and minimum staff training requirements.

Audit rights and dispute resolution procedures

We can inspect and audit suppliers' premises or documents at any time, and our dispute resolution procedures allow us to engage with suppliers to resolve any concerns or disputes we have.

Termination

We can terminate a contract in the event of a breach by a supplier.

Policies and procedures

Our policies and procedures set out our high expectations in relation to the conduct of our employees and are designed to provide avenues for employees and suppliers to raise concerns about conduct that they observe.

<p><u>Code of Conduct</u></p>	<p>Sets out the standards of behaviour expected from employees. It requires employees to:</p> <ul style="list-style-type: none">• Ensure their professional and personal conduct is consistent with our values• Treat all people with respect and dignity and challenge any form of harassment, discrimination, intimidation, exploitation or abuse• Protect the health, safety and welfare of all employees, contractors and other stakeholders• Adhere to high business integrity standards and maintain high quality standards• Ensure our suppliers adhere to our contracts (which commonly contain modern slavery clauses)• Raise any serious concerns relating to their work, our organisation or the conduct of others <p>The Code of Conduct is part of the onboarding process for all new employees and annual compliance training, and any breach by an employee is considered a breach of their employment contract.</p>
<p>Procurement Policy & Procedure (Non-public policy)</p>	<p>Sets out our procurement framework for new products and services, which employees and contractors must comply with. Some of the key objectives of the Procurement Policy & Procedure are to ensure probity, accountability and transparency in our procurement operations, and to reduce or mitigate the risks in our engagements with suppliers. It also requires any procurement decisions to consider economic, social and environmental impacts.</p>
<p><u>Whistleblower Policy</u></p>	<p>Provides a mechanism for all stakeholders (including employees and suppliers) to report concerns and outlines the protections we have in place to ensure employees can report concerns confidentially and without fear of intimidation, disadvantage or reprisal.</p> <p>Stakeholders have the option of reporting concerns through Stopline, an independent and confidential reporting service. Stopline also accommodates a number of languages, which is vital for our global business.</p>
<p>Staff Grievance Policy (Non-public policy)</p>	<p>Provides a mechanism for employees to raise grievances about the workplace or other employees, including any grievances involving health and safety. This policy aims to ensure grievances are handled in a fair and transparent manner, fostering a safe and inclusive work environment where employees feel safe and supported, without fear of vilification, victimisation or reprisal.</p>

Risk management framework

The Risk Management Framework documents our approach to risk management for making business decisions. It sets out matters such as:

- Our risk tolerances for doing business, which include a zero tolerance for arrangements which breach ethical standards
- How risks should be rated, documented and reviewed (including frequency of review)

The supplier due diligence program that we are seeking to develop in the next financial year will take into account the principles set out in the Risk Management Framework.

Global market risks steering committee

We formed a Global Market Risks Steering Committee during the financial year to oversee our global strategic objectives. The committee's functions include:

- Ensuring that the management of market risks is integrated into the development of strategic, global expansion and internal business plans, and the achievement of our vision and values
- Ensuring that the integrated risk management process is aligned to our Risk Management Framework
- Minimising the likelihood of unacceptable outcomes
- Providing a better understanding of risks associated with the markets that we are in or wanting to expand into
- Providing governance and oversight of all operations and projects undertaken which involve our global market activities and matters that are considered to present an elevated operational risk to us
- Monitoring and evaluating the risk identification and management systems in place for each major projects

The committee comprises key stakeholders, including the Chief Executive Officer, Manager of Risk & Compliance and Global Head of Commercial, which means it is well-placed to assess and address any modern slavery risks that arise in relation to particular strategic or expansion projects.

New country entry due diligence

Before we decide to start operating in a new country, we undertake a standard due diligence process that documents the regulatory requirements and risks associated with entering into, and operating in, that country. This includes considering any sanctions or geographic or geopolitical risks relating to the country, which would include any geographic or sector modern slavery risks. If modern slavery risks are raised, we consider whether those risks can be adequately mitigated and, if so, how.

Regular test delivery partner meetings

We have regular meetings with test delivery providers to discuss operational performance, which includes staffing issues. Those meetings provide a platform for any modern slavery-related concerns to be discussed and addressed.

Employee training

Our employees must complete online mandatory compliance training yearly. Included in that training program are courses on anti-bribery and corruption. In the next financial year we will be implementing a Modern Slavery Policy, which will have training associated with it as part of the annual compliance training program.

Effectiveness of our actions



Our focus during the financial year was to understand our supplier network and the possible modern slavery risks present in our operations and supply chain, particularly in relation to our test delivery partners.

Enforcing contractual rights

We have strong relationships with our test delivery providers as our engagement with them provides significant opportunities for them to grow their businesses. For this reason, our contracts with test delivery providers have been effective in addressing any concerns we may have with their businesses or conduct. For example, we have rights to suspend their authority to administer the OET (and have previously done so) if we have reasonable cause to believe that they have materially failed to fulfil their obligations under the contract. The suspension process allows us to provide a recommended action plan and leverage our working relationship to help improve and effect change within their businesses.

Audits

Our random audits of test delivery providers during the financial year also provided visibility into their businesses and helped us proactively identify any issues that may require remediation. The independent audits are focussed on test delivery rather than modern slavery, but we expect that the auditors would notify us of any modern slavery concerns identified during the audits.

Policy reviews

To ensure our policies remain current and fit for purpose, we review them every three years or more frequently if there is a change in law or business strategy.

We recognise that assessing the effectiveness of our actions is a continuous process and will finalise a continuous review framework in the next financial year.



Planned actions for 2022-2023 financial year

We have developed a roadmap of actions that we plan to take in the next financial year to continue our commitment to eliminate modern slavery from our operations and supply chain. We will measure our performance against this roadmap in the next modern slavery statement. The roadmap of actions will be regularly reported and reviewed by the CBLA Audit & Risk Committee and reported to the CBLA Board along with any future statements.

Action

Form a Modern Slavery Working Group to regularly meet to discuss any potential modern slavery risks

Prepare a Modern Slavery Working Group Charter to set out how the Working Group will consider modern slavery risks and conduct risk assessments

Develop a Modern Slavery Policy

Update the Global Market Risks Steering Committee Charter to expressly incorporate a consideration of modern slavery risks

Update the Whistleblower Policy to expressly refer to modern slavery concerns

Update the Procurement Policy & Procedure to expressly incorporate a consideration of modern slavery risks

Develop a standard framework for seeking to include modern slavery clauses in supplier contracts where we are unable to use our standard contracts

Develop a supplier questionnaire and risk assessment checklist for supplier due diligence

Incorporate the Modern Slavery Policy and supplier questionnaire into the Procurement Policy & Procedure and/or supplier onboarding process

Require employees to complete the modern slavery modules available on our employee online training platform

Conduct an independent audit of our occupational health and safety framework

Develop a supplier risk assessment and due diligence program for existing suppliers

Develop a continuous review framework, including for periodic reviews of existing suppliers to ensure risk assessments remain current and accurate and for assessing the effectiveness of our actions



Consultation with entities we own or control

This Modern Slavery Statement was approved by the Board of Directors of Cambridge Boxhill Language Assessment Pty. Ltd. on 8 December 2022 and adopted by OET Global Pty Ltd at the Board meeting on 24 November 2022 and OET USA, LLC at the Board meeting on 24 November 2022. OET Global Pty Ltd and OET USA, LLC had opportunities to provide input into the preparation of this modern slavery statement and did not require significant consultation as their operations are not independent to those of Cambridge Boxhill Language Assessment Pty. Ltd.





Approval

This modern slavery statement was approved by the Board of Directors of Cambridge Boxhill Language Assessment Pty Ltd ATF Cambridge Boxhill Language Assessment Unit Trust on 8 December 2022.

Francesca Woodward
Chair

Sujata Stead
Chief Executive Officer

On behalf of the Board of Directors of
Cambridge Boxhill Language Assessment
Pty Ltd ATF Cambridge Boxhill Language
Assessment Unit Trust



Appendix

This Modern Slavery Statement was prepared in accordance with the criteria set out in the Modern Slavery Act 2018 (Cth). The table below outlines where information related to each mandatory reporting criteria can be located within the report.

Mandatory criteria	Page
Identify the reporting entity.	3
Describe the reporting entity's structure, operations and supply chains.	4 - 6
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	7
Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	8 - 11
Describe how the reporting entity assesses the effectiveness of these actions.	11
Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls.	13
Any other information that the reporting entity, or the entity giving the statement, considers relevant.	12



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