

A man in a yellow shirt and blue jeans, carrying a black backpack, is walking across a bridge. The bridge has a dark metal railing and large, riveted steel beams. In the background, a city skyline with several tall buildings is visible under a bright sky. The sun is low, creating a warm glow and long shadows on the bridge deck.

# Modern Slavery

## Statement 2023



IDP is committed  
to building  
sustainable futures and  
improving the lives  
of our customers and  
their wider communities.



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IDP Education Limited ABN 59 117 676 463 and IELTS Australia Pty Ltd ABN 84 008 664 766.

Further information on our broader approach to community and corporate responsibility is available at [www.idp.com/partners/corporate-responsibility](http://www.idp.com/partners/corporate-responsibility).

This joint statement has been prepared in consultation with each reporting entity covered by this statement. It has been approved by the Board of Directors of IDP Education Limited and the Board of Directors of IELTS Australia Pty Ltd.

A handwritten signature in white ink, appearing to read 'Peter Polson', with a horizontal line underneath.

Peter Polson  
Chair  
IDP Education

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# 1

## Our commitment

For more than 50 years, IDP has been changing people's lives.

Whether it is people's aspirations for international education, English language learning or working in another part of the world, IDP plays a role in helping people to realise global opportunities.

Operating in more than 80 countries, we have the influence and reach to enact real change.

We take this responsibility seriously, and we are committed to upholding human rights and ethical business practices, and to preventing modern slavery in all of our operations and supply chains. This is part of our overarching sustainability approach to ensure we operate with integrity as a trusted partner everywhere in the world.

This statement outlines our approach to assess and address modern slavery risks in our global operations and supply chain in accordance with the seven mandatory criteria set out in the Modern Slavery Act 2018 (Cth).

In FY23, we continued to uplift our approach to modern slavery risks through enhancement to our risk assessment process and supplier governance. This year we have also extended our due diligence to include our referral partners who assist students with services at their study destinations. We have taken this value-chain approach in response to recent findings of incidences of human trafficking related to the international student recruitment sector.

While we did not identify any instances of modern slavery in our operations, supply chains or referral partners, we acknowledge that we must remain vigilant in monitoring and addressing these risks.



# 2

## About IDP

**IDP Education Ltd is a public company listed on the Australian Securities Exchange (ASX). IDP is a world leader in international student placement and a proud co-owner of the world's most popular high-stakes English language test (IELTS).**

We have a global team of more than 6,800 people employed in 31 countries and our websites attract 100 million visits annually.

We partner with more than 890 quality universities and institutions across Australia, Canada, Ireland, New Zealand, the United Kingdom and the United States. IDP has more than 2,000 expert education counsellors around the world. Our counsellors are highly trained to support genuine students to submit quality, verified applications. Our teams work with our customers at every step, from course search through to starting their dream course or career.

IDP also makes IELTS available in more than 2,100 test locations and online options. This includes more than 400 IELTS on Computer test centres.

**We focus on building trusted human relationships, supported with innovative use of data and digital technology. Our studies into real-time student behaviour, market knowledge, and global reach provide the tools and insight for strategic planning and success.**

### Our structure

IDP operates directly and through a number of wholly owned subsidiary companies and foreign branches. The subsidiaries are located in Australia, South Korea, Thailand, Vietnam, Cambodia, China, Indonesia, India, Canada, Egypt, Bangladesh, Türkiye, New Zealand, Nepal, Hong Kong, Pakistan, Japan, United Kingdom, Nigeria, Kenya, Sri Lanka, Saudi Arabia and United States. IDP has branch offices in Malaysia, Philippines, Mauritius, Singapore, Oman, Ghana, United Arab Emirates and Taiwan. For more information on our subsidiaries, please see our Annual Report available through our Investor Centre.

IDP also operates indirectly in other countries where we do not have a local presence through third-party arrangements. This allows us to offer our services to more people in more locations around the world.

### Reporting entities covered by the statement

This statement is a joint Modern Slavery Statement for the year ended 30 June 2023 covering IDP Education Limited ("IDP") and its wholly owned subsidiary IELTS Australia Pty Ltd ("IELTS Australia"), with both IDP and IELTS Australia being reporting entities under the Modern Slavery Act (Cth) (Act).

IELTS Australia conducts English language tests in more than 50 venues across Australia. IDP and IELTS have shared internal policies and procedures. Where this Statement describes steps taken by IDP to assess and address risks of modern slavery practices, those steps have been taken on behalf of both reporting entities.

For the purposes of this statement, "IDP", "we", and "our" refers to IDP Education Limited and its wholly owned subsidiaries, including IELTS Australia.

In November 2022, IDP acquired Intake Education (formerly UKEAS) another leading international education organisation. In May 2023, IDP acquired The Ambassador Platform, a UK-based technology company that provides a platform for higher education institutions to connect their existing students to prospective students.

The activities described in this statement do not yet include the supply chains and partners of Intake Education or The Ambassador Platform. The activities of these businesses will be incorporated into IDP's 2024 Modern Slavery Statement. Both Intake and The Ambassador Platform's Modern Slavery practices were considered in due diligence prior to the acquisitions.

Other than the entities described above, no other IDP subsidiary meets the reporting entity criteria under the Modern Slavery Act.

# 3

## Global operations, workforce and value chain

### Our operations

IDP is a global international education and technology company providing services around the world to help people achieve their study or career goals.

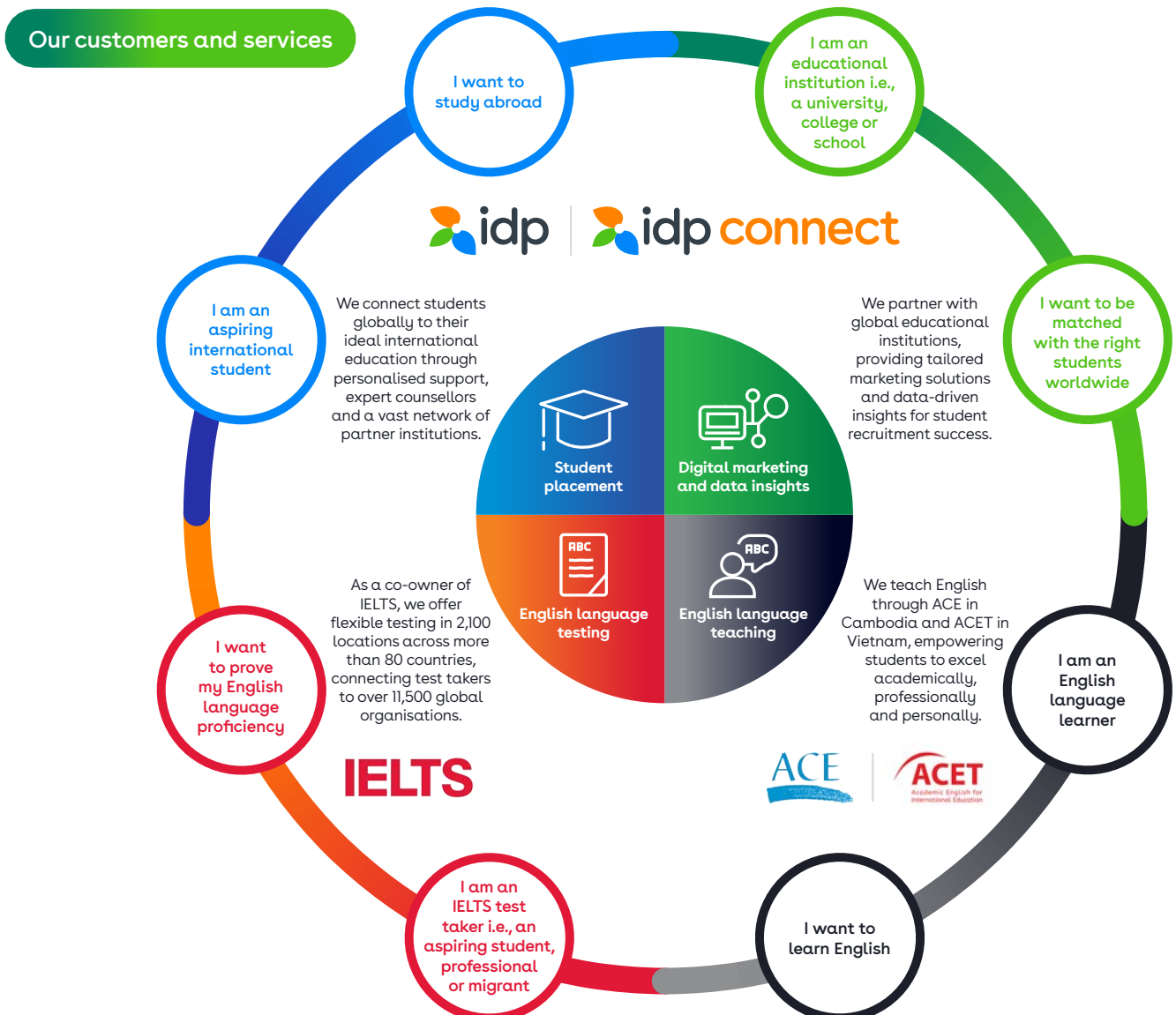
Our purpose is to change people’s lives by helping them realise global opportunities. We do this through our international network of teams who service our customers and clients under our four main businesses.

### Our workforce

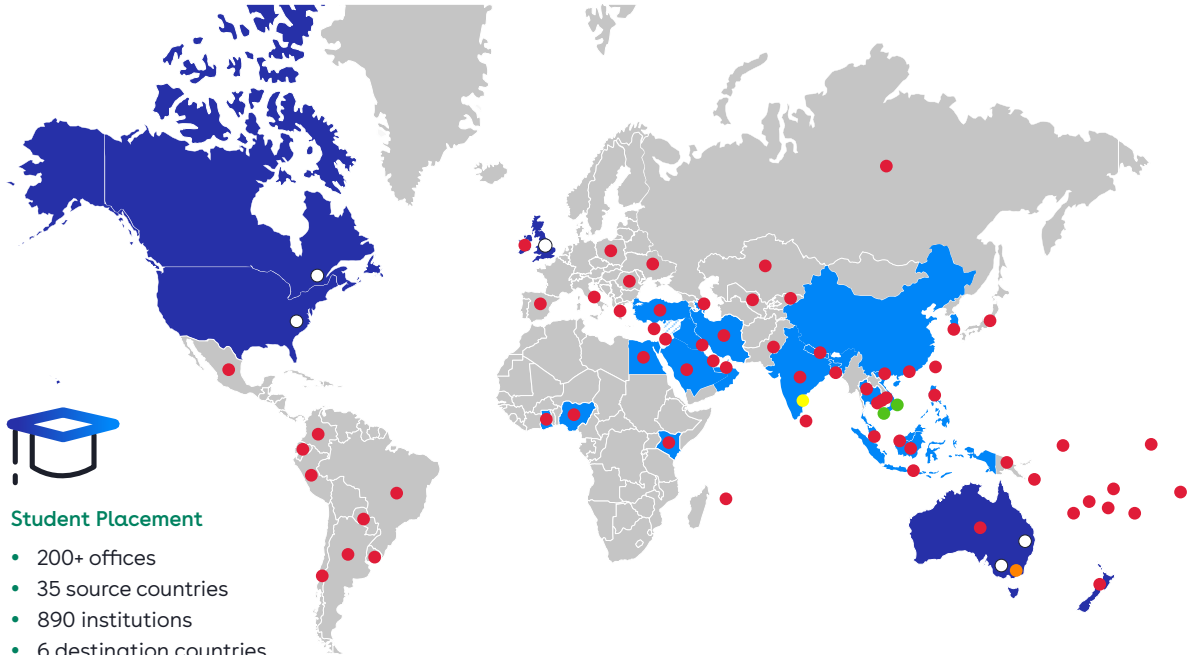
As at 30 June 2023, IDP has 6806 team members in our total direct workforce across 31 countries around the world. Almost 95 per cent of our team are outside Australia, with the largest proportion of team members within our South Asia and South East Asia teams.

IDP is a global team of diverse individuals that brings a broad range of skills and experience to our organisation. We recognise that we operate and employ people in many countries that score highly in the Global Slavery Index’s analysis of countries’ vulnerability to risks of modern slavery practices. Through our risk assessment process of our direct workforce we identified inherent geographic and role-based risks.

IDP has a large indirect workforce that allows us to provide our products and services in more countries around the world. Most of these workers support our IELTS test centres and associated services. As test centres operate largely on demand, our indirect workforce numbers are variable, and we have not yet determined our total global indirect workforce.



## Our locations



### Student Placement

- 200+ offices
- 35 source countries
- 890 institutions
- 6 destination countries
- 700,000+ students placed



### English Language Testing

- 2,100 test locations
- Over 80 countries (including IELTS Online)
- 400+ IELTS on Computer test centres
- 11,500+ Recognising Institutions



### English Language Teaching

- 9 campuses
- 2 countries

- Destination country (Student Placement)
- Source region (Student Placement)
- IDP Education IELTS testing countries
- English Language Teaching campuses
- Head office - Melbourne
- IDP Connect offices
- Digital Campus - Chennai



A global team of more than 6,800 people in 31 countries

50+

A 50+ year history of helping students achieve their dreams



Headquartered in Melbourne, IDP is listed on the Australian Securities Exchange ASX:IEL



IDP has helped more than 700,000 students study in quality courses around the world, with 100,000 helped in FY23 alone.

## Our value chain

We work with a range of suppliers and partners to provide our services, including third-party test centre providers, contractors, and other service providers. These relationships are critical to our business success, and we are very serious about our responsibility to ensure that all steps are taken to minimise the risks of modern slavery practices in our operations and supply chains.

This year investigations and media reporting on human trafficking and modern slavery have put a spotlight on instances of human trafficking within the international education sector, both in the United Kingdom and Australia. This highlighted an inherent risk to global mobility; whenever there is a movement of people across borders, there are also those that seek to exploit the vulnerable and take advantage of those seeking opportunity.

These findings prompted us to broaden our approach to include our Student Essentials partners in our modern slavery due diligence and risk assessment process.

## Our suppliers and partners

IDP conducts analysis of our total procurement spend through our cloud-based invoice management system. The findings are presented in the following pages and formed the basis for our supplier risk identification and assessment process.

In FY23:

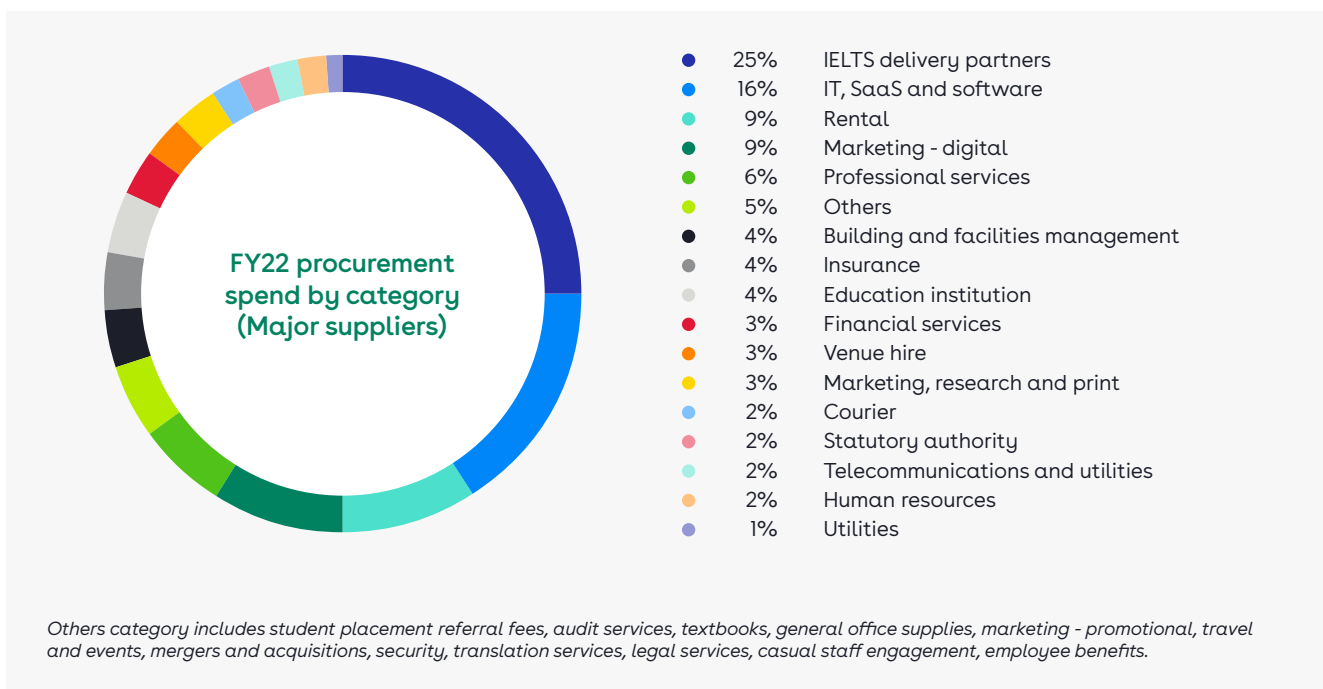
- IDP engaged more than 260 major<sup>1</sup> suppliers from more than 25 countries based on supplier invoicing entity location.
- Approximately 80 per cent of our total spend was for the procurement of services.
- Major suppliers represent more than 70 per cent of our estimated annual procurement spend of over A\$180 million.

IDP procures products and services from suppliers based all over the world. While global contracts are often procured from suppliers in Australia, India and the United Kingdom, we also engage with many local suppliers located in the same countries as our office locations.

Our spend categories are typical for a services organisation, with our top three spend categories as

- IELTS delivery partners
- IT, SaaS and software
- Rental.

We engage third-party testing centres as IELTS delivery partners to run our English-language testing generally in locations where we do not have a local presence. These delivery partners lease venues and engage staff such as invigilators and proctors to manage the delivery of IELTS tests. IDP manages the booking process and administration as well as the marking and communication of results to test takers.

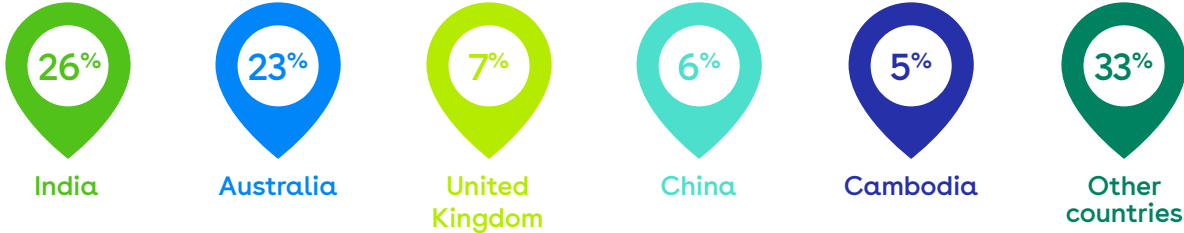
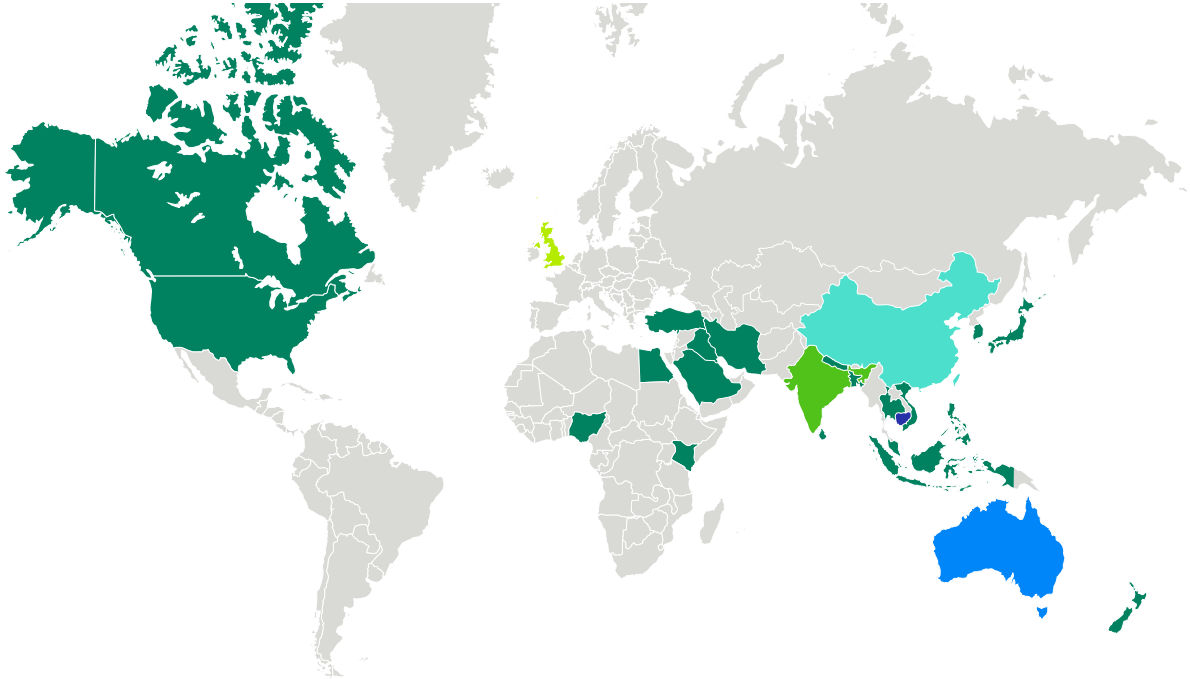


1. Our classification of "major supplier" is based on a supplier having expenditure equal to or more than A\$100,000 in a single financial year.



## Supplier Geographical Distribution

The below map represents the locations of our major suppliers based on the supplier's invoicing entity<sup>2</sup>.



2. The map shows the location of our five largest suppliers (%) based on the supplier's invoicing entity, rounded to the nearest whole number.

'Other' countries include: United Arab Emirates 4.23%, Hong Kong 4.23%, United States 3.46%, Canada 2.69%, Saudi Arabia 2.69%, Vietnam 1.92%, Taiwan 1.15%, Ireland 1.15%, Oman 1.15%, Malaysia 1.15%, Singapore 1.15%, Egypt 1.15%, Bangladesh 1.15%, Japan 1.15%, Thailand 0.77%, Indonesia 0.77%, Türkiye 0.38%, Nigeria 0.38%, Korea, Republic of 0.38%, Pakistan 0.38%, Poland 0.38%, Netherlands 0.38%, Nepal 0.38%.



# 4

## How we identify and assess modern slavery risks

### Modern slavery as part of our broader sustainability approach

This year, IDP undertook a comprehensive materiality assessment to understand the most pertinent sustainability topics relevant to our global strategy and our key stakeholders. We followed a robust methodology informed by leading Environment, Social and Governance (ESG) frameworks including the GRI Standards, the International Sustainability Standards Board (ISSB) and the UN Sustainable Development Goals.

Stakeholders across our value chain were invited to participate in the process, along with senior leaders across our global network. Members of our Global Leadership Team also actively participated and validated the final outcomes, which identified 17 material topics of highest importance to IDP and our stakeholders.

The prevention of modern slavery was one of the identified material topics, highlighting its importance to stakeholders and impact to IDP.

### Risk identification

In FY23, IDP continued to consider risks within its direct workforce and supply chain. We also enhanced our risk assessment process to capture our Student Essentials program.

As a result of this analysis, we identified areas of our operations that carry a heightened risk of modern slavery practices, particularly suppliers in higher risk geographies<sup>3</sup> or product and service categories that may use low-skilled or migrant labour.



3. Based off the Global Slavery Index score of Modern Slavery Vulnerability: [www.walkfree.org/global-slavery-index/map/#mode=data:dimension=v](http://www.walkfree.org/global-slavery-index/map/#mode=data:dimension=v)

## Risk assessment process

### Direct workforce risks

The assessment of inherent modern slavery risks within our direct workforce considered the geographical distribution of our workforce against data that indicates the risk and prevalence of modern slavery in different jurisdictions globally. From this analysis we were able to identify that we had direct employees in high-risk geographies, including:

- Pakistan
- Nigeria
- Cambodia
- Egypt
- Philippines
- India
- Türkiye
- Thailand
- China
- Indonesia

All of these countries have a Global Slavery Index over 50.

The vast majority of IDP employees are engaged in professional or office-based roles. Our analysis, however, identified several roles that have been traditionally more vulnerable to exploitation across some of the countries outlined above including cleaning staff, drivers and security guards.

The identified high-risk geographies were then assessed against IDP's risk and assurance activities, including the Control Self-Assessment program and Group Internal Audit reviews of IDP countries. These activities measure compliance against IDP's global policies, including procurement and supplier policies as well as local country obligations including employment laws and regulations. As such, we are able to demonstrate compliance to these policies and their modern slavery requirements or detect potential breaches for remediation.

### Supply chain risks

Our updated approach built on previous assessments by considering indicators such as the nature of the products and services being supplied, the geographies in which suppliers operate (linked to the GSI Modern Slavery Score), the size of IDP's spend with that supplier, and our history of engagement with that supplier on modern slavery related matters.

The risk assessment conducted in FY23 covered suppliers where our spend was greater than A\$100,000 during FY22, for all entities which are owned or controlled by IDP. We also conducted a modern slavery risk identification analysis across third-party test centres and referral partners (from our Student Essentials program) in specific countries of higher risk.

This year we evolved our risk assessment process from previous years to include additional factors to the methodology and a weighted average score, in line with the guidance published by the Australian Department of Home Affairs<sup>4</sup> and using resources such as the Global Slavery Index (GSI).

4. Commonwealth Modern Slavery 2018 - Guidance for Reporting Entities, at <https://www.homeaffairs.gov.au/criminal-justice/files/modern-slavery-reporting-entities.pdf>.

Our methodology assesses modern slavery risk through four key factors:



1-100

**Country** - Based on the GSI 'Modern Slavery Vulnerability Score', each country is scored on a scale of one to 100 with one reflecting the lowest chance of vulnerability to modern slavery within the population and 100 reflecting the highest risk.



**Product and/or service** - Products and services are classified into high, medium, or low modern slavery risk categories (see material categories table next page).



**Spend** - We considered our spend profile across our suppliers and applied the following thresholds in assessing risk: spend over A\$350,000 were considered higher risk, A\$190,000 to A\$350,000 as medium risk and A\$190,000 and below as lower risk. Importantly, the spend dimension in the model did not remove any high-risk providers identified using only the other two categories, but it did elevate some suppliers of moderate to low-risk into the overall higher-risk category.



**Professional judgement** - In addition to the factors described above, professional judgement and insights gained through IDP's operations, such as relationships and history with certain providers or geographies, including the responsiveness of providers to previous Modern Slavery engagement requests, were also used to calibrate this year's risk assessment.

An analysis of our value chain using the categories of risks outlined in the United Nations Guiding Principles on Business and Human Rights was also reviewed again in FY23. The Guiding Principles consider whether risks were 'caused', 'contributed to' or 'may be directly linked to' IDP. Using this methodology, we did not identify any risks 'caused' or 'contributed to' by IDP. All the risks identified in the table on page 11 were in the category of 'may be directly linked to' IDP.

Material category	Nature of risk	IDP's relationship to risk
Marketing	There is a risk that the production of goods used for marketing and promotion could be associated with vulnerable populations in higher-risk geographies due to it being a low-cost manufacturing activity.	Directly linked through business relationships
Professional services	There is a risk that suppliers of these services do not meet minimum requirements for minimum wage and conditions in higher risk geographies.	Directly linked through business relationships
Outsourced labour including third-party testing centres (IELTS delivery partners)	There is a risk that outsourced labour providers, including third party IELTS test centres and Student Placement offices do not meet minimum requirements for minimum wage and conditions in higher risk geographies.	Directly linked through business relationships
Venue hire	There is a risk that venue suppliers of these services do not meet minimum requirements for minimum wage and conditions in higher risk geographies.	Directly linked through business relationships
IT and telecommunications	There is a risk that the component parts provided in IT and telecommunications products include materials that have been extracted/produced in ways that do not meet minimum requirements for minimum wage and conditions we specify Australia so not just higher risk geographies	Directly linked through business relationships
Building and facilities management	There is a risk that building and facilities management providers in Australia and overseas use labour that does not meet minimum requirements for minimum wage and conditions in higher risk geographies.	Directly linked through business relationships
Office supplies	There is a risk that the products and component parts sourced through office supplies providers are produced in ways that do not meet minimum requirements for minimum wage and conditions in higher risk geographies.	Directly linked through business relationships
Translation services	There is a risk that suppliers of translation services use outsourced labour that does not meet minimum requirements for minimum wage and conditions in higher risk geographies.	Directly linked through business relationships
Couriers	There is a risk that courier services use outsourced labour that does not meet minimum requirements for minimum wage and conditions in higher risk geographies.	Directly linked through business relationships

### Modern Slavery questionnaire

Suppliers who were assessed as high risk, based on the methodology outlined above, were sent a Modern Slavery questionnaire in order to understand any significant exposures and how each supplier is addressing its own modern slavery risks. The indicators included in the questionnaire were:

- Whether they have a modern slavery policy in place.
- Whether they have written employment contracts for all workers which includes clear terms and conditions.
- Whether they have assessed the risk of modern slavery in their business.
- Whether child labour checks are performed.
- Whether the organisation has been investigated or convicted of breaching human rights.
- If they operate in a country which has a high risk of modern slavery according to the Global Slavery Index which is published by Walk Free.
- If the goods or services provided are high risk.

### Key findings from our risk assessment

IDP, like most organisations with a global footprint, operates in a number of geographies where inherent risks of modern slavery exist. These inherent risks are particularly relevant in the material categories outlined above.

Our risk assessment process identified a prioritised list of 80 suppliers and partners that required engagement through our Modern Slavery questionnaire.

The results of the survey responses were reviewed, and each supplier was given an updated risk rating based on their response. Five suppliers were identified as high risk based on their responses to the questionnaire and requiring further engagement. These suppliers have been contacted with requests for additional information, as well as clear communication of IDP's expectations relating to modern slavery (refer to the table on the following page). Additional support was offered to help these suppliers understand their role in preventing modern slavery in IDP's supply chain, with further engagement activities planned in FY24. The engagement activities will be informed by IDP's Response and Remedy Plan.

High risk supplier descriptions	Actions
<ul style="list-style-type: none"> <li>• Marketing in Cambodia</li> <li>• Cloud billing and monetisation platform in USA</li> <li>• Office supplies vendor in India</li> </ul>	Suppliers were contacted with additional information requests to help IDP to clarify their responses to the survey and better understand how they manage the identified risks. In addition they were provided with resources to promote better modern slavery practices and a clear statement of IDP's expectations. Further risk assessment and engagement with these suppliers will occur in FY24.
Third-party IELTS test centres <ul style="list-style-type: none"> <li>• Pakistan</li> <li>• Indonesia</li> </ul>	We contacted the two third party IELTS test centres regarding their responses on our Modern Slavery questionnaire to share our concerns and feedback and provide guidance based on their response. The IDP regional manager in charge of the test centre is informed and included in this follow up communication.

Actions taken by these suppliers to address the recommendations will be tracked through further engagement in FY24 and responses to the next annual Modern Slavery questionnaire.

There were four suppliers who were evaluated at medium risk level based on their survey responses. These suppliers were provided with resources and closing recommendations for enhancing modern slavery awareness in their organisations.

In the 2022 Modern Slavery statement we provided a supplier case study where we met with a third-party test centre to understand the policies and processes, they had in place.

This supplier has been re-assessed during the year and having shown considerable improvement to its processes, is now assessed as low risk by IDP.

### Case study: Modern slavery risks in our broader value chain

In FY23, we expanded our assessment of modern slavery risks beyond our direct supply chain providers and workforce. Modern slavery and human rights abuses exist wherever people migrate between countries. As a provider of services in the international education and migration sectors, we are conscious that our customers may be exposed to modern slavery risks outside of the products and services we directly offer.

IDP partners with a range of providers to offer additional value-added services to international students through a referral program called Student Essentials. These referral partners are not suppliers of products and services to IDP. However given the referral relationship and nature of our industry, in FY23 we expanded our modern slavery analysis to consider where modern slavery risks might exist.

Our assessment of Student Essentials providers mirrored closely our supply chain risk analysis including consideration of:

- 1** The geographies in which the referral partners operate.
- 2** The types of products and services offered.
- 3** The size and maturity of the organisations involved.

As a result of this analysis, we focused on referral partners offering services in accommodation and visa/migration support.

These providers were included in our Modern Slavery questionnaire process for the first time in FY23, including the provision of modern slavery information and resources by IDP at the conclusion of the process. One of the providers engaged was assessed as a medium risk as a result of their response to the questionnaire, and as such was followed up for additional information and provided with resources to support improved practices.

IDP will build on this expansion of our analysis in FY23 and continue to include Student Essentials providers in our modern slavery analysis processes in FY24.

# 5

## Governance of modern slavery risks

### Corporate governance

Our Corporate Governance Framework is designed to promote responsible management and ethical conduct including protection from modern slavery issues, through policies and practices, internal controls and risk and compliance management processes. This is to ensure we continue to meet our responsibilities and obligations to our shareholders, stakeholders and employees.

#### Board Sustainability Workshop

This year the IDP Board of Directors participated in a sustainability workshop to discuss the link between our sustainability strategy, our material topics including modern slavery and human rights, and the actions the company is taking. The workshop provided an opportunity for Directors to engage with senior management on modern slavery issues outside of the Modern Slavery Statement review process.



#### Our governance structure



This year we focused on enhancing our modern slavery compliance framework by uplifting controls and improving our compliance culture and capability. This included creating a Modern Slavery Response and Remedy Framework, outlining how we will respond to instances of modern slavery. Our corporate governance practices for the year ended 30 June 2023 are outlined in the Corporate Governance Statement 2023.

Management of modern slavery issues and risks at IDP is supported and led by the Modern Slavery Working Group. The Modern Slavery Working Group is a cross-functional group comprising members from Risk, Procurement, Internal Audit, Legal and Finance, Corporate Responsibility, People Experience and Corporate Affairs teams. The Working Group meets regularly to consider and address modern slavery issues and how they are managed across IDP and collaborates to prepare this Modern Slavery Statement each year.

## Our values

As the global leader in international education, we have focused on building trusted human relationships for more than 50 years. We are driven by our values of Integrity, Caring, Community, Expertise and Quality. Our values underpin the way we do things at IDP and shape the way we engage with all customers, team members and stakeholders.



Integrity



Quality



Community



Caring



Expertise

## Policies and procedures

IDP has implemented policies and procedures that aim to prevent modern slavery occurring within all aspects of our business.

The IDP Code of Conduct sets the behavioural standards for everyone who works for IDP. It outlines the way we conduct business on behalf of IDP and the basic principles and minimum standards of expected behaviour. The Code also outlines our commitment to ethical business practices and prohibits any form of modern slavery or human trafficking for everyone who conducts business on behalf of IDP. This applies globally and includes all team members, our Board of Directors, all officers of IDP and its subsidiaries, and those engaged in any representative capacity. It is communicated to everyone as part of the onboarding process, is available on our intranet and website and forms the basis of our annual mandatory compliance training which includes areas such as risk, anti-bribery and corruption, privacy, and bullying and harassment.

Our Supplier Code of Conduct sets out our expectations for our suppliers and partners with respect to human rights, labour practices, environmental protection, human trafficking, health and safety, bribery and corruption, data protection and ethical business conduct. We expect our suppliers to comply with this Code, as well as with all local, national and other applicable laws and regulations in the jurisdictions where they operate. The Supplier Code of Conduct includes a mechanism for suppliers to raise any actual or suspected breach of the Code, including modern slavery with IDP's global procurement team. Suppliers are informed of the Supplier Code of Conduct as part of the active PO engagement.

Our Whistleblower Protection Policy provides a way for people to report concerns about issues such as modern slavery or human rights. We encourage and promote honest and ethical behaviour and aim to provide an environment where it is safe for employees to raise their concerns if something does not look right and a clear process to escalate concerns. This year, our policy was updated to include suppliers as whistleblowers and provide additional contact channels to IDP's Whistleblower Investigations Team.

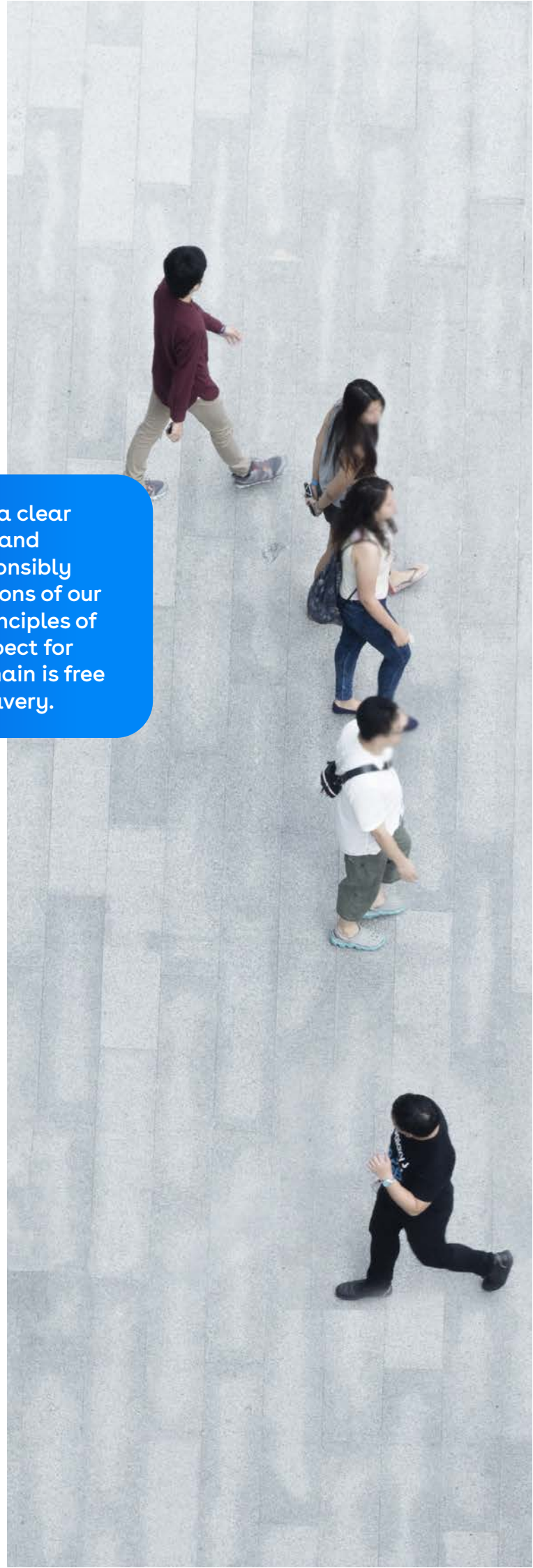
All reports made under this Policy are investigated by the Whistleblower Investigations Team and findings are reported to the Whistleblower Committee. Whistleblower activity is reported to the Audit & Risk Committee of the Board on a regular basis.

**Our Corporate Responsibility Policy provides a clear framework to guide our decisions, operations and activities to ensure we act ethically and responsibly and in a way that goes beyond the expectations of our stakeholders and ourselves. One of the six principles of our Corporate Responsibility Policy is the respect for human rights including ensuring our supply chain is free of human rights violations such as modern slavery.**

Our Code of Conduct and global policies are reviewed regularly to ensure they remain relevant and clearly define our expected behaviours.

All team members are responsible for understanding and following the policy requirements that apply to their roles and reading and acknowledging the Code of Conduct and other relevant policies each year. Leaders throughout our organisation are accountable for creating and fostering a work environment that encourages ethical behaviour and compliance. Alleged Code breaches are investigated and acted upon accordingly. This can include investigations by the Group Internal Audit team. Material breaches of the Code are regularly reported to the Audit & Risk Committee of the Board.

In FY23, we received no reports through our whistleblower channels related to modern slavery issues in our supply chain. While this is encouraging, we acknowledge that this does not necessarily mean that modern slavery issues do not exist, and we will continue to improve the effectiveness of our mechanisms to ensure any such incidents are raised.





# 6

## How we are addressing risks

### Purchase orders incorporating T&Cs

Our Supplier Terms & Conditions, which are incorporated into our purchase orders for goods and services, set out IDP's requirements relating to modern slavery. This gives us the ability to drive compliance within our direct suppliers and ensure they cascade our expectations into their supply chains.

### Supplier risk assessment and engagement plan

As set out in section 4, the supplier risk assessment process conducted over our supply chain identified suppliers who we consider to be at higher risk of modern slavery practices. The approach towards engaging the suppliers involves:

- Highlighting the responses which indicate risks of modern slavery practices, and
- Recommending actions for the supplier to adopt to address the risk identified.

In FY23, we have implemented a Modern Slavery Response and Remedy Framework. The framework, which draws on the framework published by Walk Free, takes a victim-centred approach and outlines our approach to responding and remedying instances of modern slavery which are identified.

### Audit and compliance

Our global operations rely on a consistent approach to the management of IDP's key compliance obligations. This year we developed a global Compliance Management Framework to create an integrated, and strategic approach at the group level.

Our Group Internal Audit function performs audit and compliance across the network covering country management and operations. The team manages a regular schedule of country audits and tests compliance to IDP's global policies, procedures and processes.

During FY23, we have incorporated testing of internal controls relating to our suppliers into internal audits of IDP countries. We assess compliance of these countries to our global procurement policy and processes. An internal audit of IDP's supplier governance and lifecycle management process is also being conducted which will include how we assess and manage the risks of modern slavery practices for our suppliers globally.

### Recruitment practices

IDP acknowledges that as a company with operations in several countries, including those with potential high risks of modern slavery, our recruitment practices are an important step in combatting modern slavery. In addition to the existing practices, in FY23 we reviewed and updated our global recruitment policy to address

modern slavery in recruitment practices. This includes practices to ensure that all staff have a proof of right to work in the country. In Australia, we have introduced a clause in contracts with third party recruitment agencies that specifically addresses modern slavery compliance requirements.

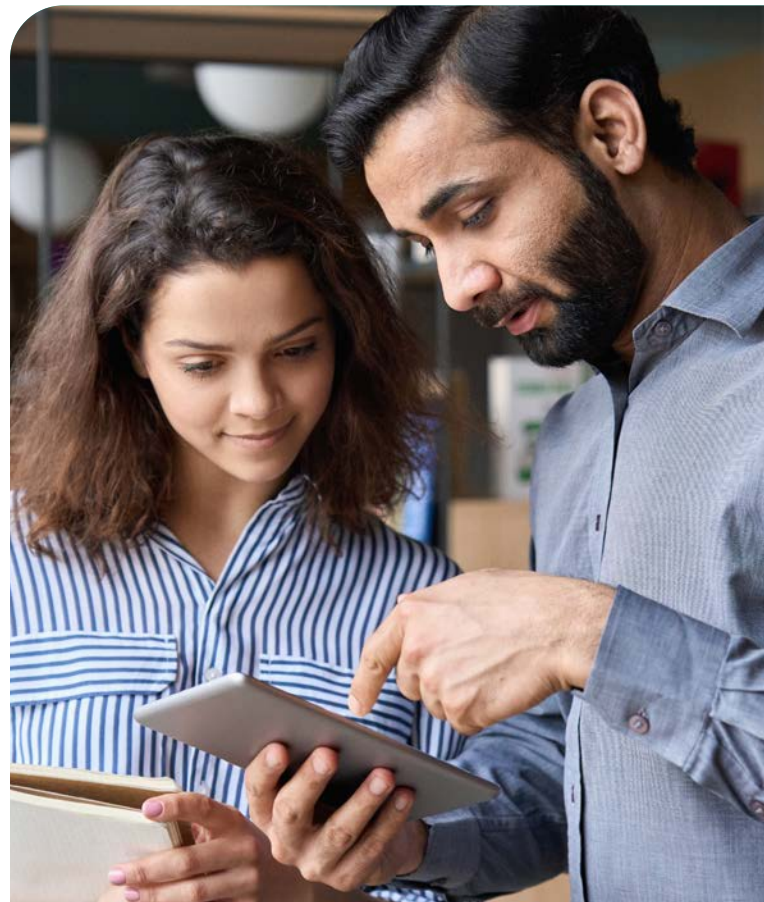
### Training and awareness

To build awareness across IDP about modern slavery we began implementation of awareness training to all people leaders and identified team members. The introductory training aims to help people understand, identify, and address modern slavery risks and its possible impacts to IDP.

Training was rolled out to the first tranche of team members in March 2023, with further tranches to be completed by the end of FY24. This introductory training will be incorporated into onboarding for new team members.

### Modern slavery resources

IDP's team of procurement experts are strategically located to support our regional operating structure, with presence in Australia, Singapore and India. This allows us to take a regional compliance approach towards ethical supplier recruitment. Each region's procurement lead is responsible for ensuring that our modern slavery requirements are incorporated into local agreements.



# 7

## Measuring effectiveness

In FY23, we commenced an internal audit of our Supplier Governance and Lifecycle management process. The audit is assessing governance, risk management and controls across our suppliers including the way we identify, assess and manage modern slavery risk. The results and recommendations from the audit will be used by senior management to enhance internal controls relating to suppliers across the organisation. The audit report will also be provided to IDP's Audit and Risk Committee.

We also include a section relating to modern slavery practices for our suppliers in IDP's annual control self-assessment questionnaire. No instances of modern slavery have been reported but we continue to monitor this area across all IDP countries which deal with suppliers.

Addressing risks of modern slavery practices is an ongoing process and IDP continues to review the effectiveness of actions taken to meet our commitments and assess further opportunities to build upon these achievements.

# 8

## Consultation on the development of this Statement

IDP operates directly and through a number of wholly-owned subsidiary companies and foreign branches around the world.

In preparing this statement, we have communicated and consulted with the Group Corporate Responsibility Management Committee, and relevant teams and individuals across IDP to continue to strengthen our approach to identifying and addressing modern

slavery risks. This includes providing the directors of IDP Education and IELTS Australia with information about our obligations under the Modern Slavery legislation and our reporting process.

Through this consultation, groups and individuals have the opportunity to provide input into IDP's approach to Modern Slavery.

# 9

## Continuing our progress

IDP will continue to monitor progress towards our FY23 commitments. We have identified areas of focus that will enable us to further progress our approach.

In FY24 our commitments include:

Focus area	Commitments
Supplier governance	<p>Review the effectiveness of our Response and Remedy Plan and seek feedback from suppliers on areas for improvement.</p> <p>Continue to take a value-chain approach to modern slavery risk assessments and investigate suppliers and partners beyond our major suppliers.</p> <p>Incorporate the suppliers and partners of Intake Education and The Ambassador Platform into our risk assessment process as we complete integration of these companies into IDP Education.</p> <p>Complete initial phase of modern slavery awareness training for people leaders and identified team members.</p>
Industry collaboration	<p>Seek to become a member of the United Nations Global Compact network and align our approach to responsible businesses including human rights and modern slavery to the Ten Principles.</p>



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