

Modern Slavery Statement

1 Introduction

This Statement is made by Open Universities Australia Pty Ltd (ACN 053 431 888) (**OUA**) pursuant to the *Modern Slavery Act 2018* (Cth) for the financial year ending 31 December 2021 (**Reporting Period**). The Statement outlines OUA's commitment to identifying and mitigating modern slavery risk in our operations and supply chains.

Our values, set out below, are in line with the commitments espoused in this Statement.



act for customer



care for each other



continuously improve

We are pleased to submit our second Statement with the Australian Border Force and to provide insight into our journey to better understand our modern slavery risks, the steps we have taken and our plans going forward. Our aim is to improve the way in which we assess and address modern slavery risks year-on-year.

2 Our structure, operations and supply chains

2.1 Our structure

OUA is a registered charity based in Melbourne at 700 Collins Street, Docklands VIC 3008, and is owned by 7 Australian universities: Curtin University, Griffith University, Macquarie University, Monash University, RMIT University, Swinburne University and University of South Australia. Our Board of Directors comprises nominee directors from each of the aforementioned universities.

Our organisation has a number of core functions, including Product, Engineering, Marketing and Corporate Services with cross-functional teams aligned to delivering on Partner Experience, Student Experience and OUA employee experience. OUA owns 3 dormant shelf companies that do not trade and have never traded.

2.2 Operations

OUA is the leading national provider of access to online tertiary education. OUA's objectives are to further tertiary education by providing access to online tertiary education which is open to all students.

As a not-for profit, we are about the impact of our marketplace for our customers. We deliver value by helping learners' access and confidently choose education that is right for them, and by partnering with universities to help them discover opportunities and drive demand for their product.

We offer over 2,400 subjects and over 600 degrees through our 24 Australian university partners across a range of disciplines. The portfolio is dynamic and changes annually. We have approximately 240 staff who are involved in enrolling over 40,000 students. 84% of our staff are full-

time workers, 15% are part-time and 1% are casual workers. In the 28 years since OUA commenced operations, we have supported over 470,000 students.

Our current university partners are La Trobe University, Flinders University, RMIT University, Australian National University, Deakin, The University of Adelaide, James Cook University, University of Tasmania, University of South Australia, Curtin University, Murdoch University, Edith Cowan University, University of New South Wales, Australian Catholic University, Charles Sturt University, The University of Newcastle, University of Technology Sydney, Griffith University, Macquarie University, Southern Cross University, University of New England, Swinburne University, Bond University and The University of Notre Dame Australia.

OUA is a member of the Elite Athlete Friendly University program. Our university partners' degree offerings suit the unique needs of elite student athletes. The degrees are designed for distance education and are accessible online. Professional athletes studying through OUA come from a range of sports including all football codes, tennis, athletics, diving and more. OUA also has corporate partnerships with over 50 business and industry leaders, including National Australia Bank, Westpac Group, Commonwealth Bank, Australian Defence Force, Coca-Cola Amatil and others, giving these organisations a competitive edge through their employees' continuing professional development.

2.3 **Supply chain**

During the Reporting Period, we had approximately 120 suppliers. We procure goods and services across the following areas (in alphabetical order):

- Accounting software
- Audit services
- Beverage supplies
- Book supplies
- Clothing supplies
- Computer hardware
- Consulting services
- Courier services
- Disability support services
- EAP services
- Education services
- Electricity supplies
- Food supplies
- Higher education services
- ID verification services
- Indoor plant supply and service
- Industry body membership subscription
- Insurance services
- IT services
- Legal services
- Market research services
- Marketing services
- Office cleaning services
- Office equipment
- Office fit out services
- Office supplies
- Payroll services
- Postal and courier services
- Premises lease
- Records management services
- Software services
- Transport services

Our higher education providers are Australian, and most of our other suppliers are too, although some may supply goods and services that originate from other jurisdictions. We utilise the services of some global software companies which are American, although some of these companies use foreign subsidiaries including those located in Singapore, the UK and parts of Europe.

3 Modern slavery risks in our operations and supply chains

3.1 In our operations

In seeking to identify the modern slavery risks in our operations and supply chain, we considered the potential for our business to cause, contribute to, or be directly linked to modern slavery. Given the fact that our operations are based in Australia, we assess our risk of modern slavery in our operations as low. Furthermore, the risk of modern slavery in our direct employment of workers is also considered low having regard to the fact that all of our staff are employed directly by OUA and work primarily in office-based roles. Our staff are also protected by, and are afforded rights under the Commonwealth Fair Work legislation.

3.2 In our supply chain

As noted in section 2.3 above, the bulk of our direct suppliers are based in Australia. Accordingly, the modern slavery risk within the first tier of our supply chain is likely to be low overall. However, we are mindful that modern slavery risks are inherent in the supply chain behind the uniforms and corporate merchandise we purchase, the lithium in our laptops and smartphones, the food and beverages we serve on our premises and hospitality services we purchase.

During the Reporting Period, over 60% of our annual procurement spend was directed to Australian higher education services. We consider that the risk of modern slavery practices occurring within the operations of these institutions is likely to be low given that they are required to comply with the legal framework regulating employment practices in Australia. Like us, their reliance on technology will mean that a particular risk in their supply chains is in IT and telecommunications. However, we rely on, and defer to, the descriptions of modern slavery risks in the modern slavery statements submitted by the universities (for those required to report) listed in section 2.2 above.

4 Actions taken to assess and address modern slavery risks

4.1 In our operations

We are committed to ensuring that our employees are paid in line with market rates. Our approach includes the consideration of market benchmarks (AON), internal relativities and performance-based rewards. Even though we are a not-for-profit organisation, we benchmark against commercially focused organisations to hire and keep high calibre people.



Our People Experience team conduct checks to ensure that those we recruit are of legal working age and are working of their own free will. Furthermore, our Code of Conduct sets out the

expected behaviours which of all our employees, namely respect, fairness and high social and ethical standards. We do not tolerate discrimination or harassment and endeavour to sustain the health, safety and wellbeing of our employees and contractors.

Our Whistleblowing Policy provides a way for our employees to report their concerns confidentially, freely and without fear of repercussion. We did not receive any reports of actual or suspected instances of modern slavery via our reporting channels during the Reporting Period. If, hypothetically, it was found that OUA had caused or contributed to modern slavery, we would seek to remediate the impact by taking a person-centred approach protecting the safety and wellbeing of the affected person and then undertaking a full investigation of the situation to ensure that an appropriate corrective action plan is implemented.

4.2 In our supply chain

Our first reporting period was the start of our journey into increasing our awareness of modern slavery risks in our supply chain so that we can better inform our purchasing decisions going forward.

During the second reporting period we strengthened our internal procurement processes to embed modern slavery considerations. We identified one supplier operating in a higher risk country, conducted a risk assessment prior to contracting and included modern slavery terms in the supplier agreement.

5 Assessing the effectiveness of our actions

In our Statement for the previous reporting period, we said we would seek to implement the following processes:

- Prepare a modern slavery questionnaire to be completed by suppliers;
- Develop a methodology to be used in interpreting the responses to questionnaires and informing supplier management actions ongoing;
- Introduce a Supplier Code of Conduct;
- Incorporate modern slavery terms into supplier agreement templates;
- Develop a remediation methodology;
- Introduce a Human Rights Policy and perform a gap analysis of existing policies;
- Train our staff on modern slavery and how to identify red flags;
- Review reported cases via the whistleblowing policy and assess how the cases were handled.

We report the following progress on the above actions:

- We have prepared a modern slavery questionnaire to be completed by suppliers;
- We have a methodology for interpreting the responses to questionnaires and informing ongoing supplier management;
- We have prepared a Supplier Code of Conduct which will be introduced in the next reporting period;

- We have incorporated modern slavery terms into our supplier agreement template;
- We have yet to develop a remediation methodology;
- Work on a gap analysis of existing policies is ongoing and a Human Rights Policy will be developed in the next reporting period;
- Key staff involved in the procurement process received training on modern slavery and we intend to roll out general awareness training for all staff in the next reporting period;
- There were no reported cases via the whistleblowing policy during the reporting period.

6 Consultation and approval

As OUA's shelf companies remain dormant, it was not necessary for us to address the mandatory reporting criteria requiring every statement to "describe the process of consultation with any entities the reporting entity owns or controls".

This statement was approved by the Board of Directors on 13 May 2022.

Signed,

A handwritten signature in black ink, appearing to read "S. Bruce Dowton". The signature is written in a cursive, flowing style.

Professor S. Bruce Dowton

Chairman

Dated this 17th day of June 2022