



# Modern Slavery and Human Trafficking Statement FY20

Published: March 2021

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This Modern Slavery and Human Trafficking Statement is the first such statement produced by the ultimate parent company of the Navitas Group, Marron Group Holdings Pty Ltd ACN 631 941 403 (MGH).

It constitutes a Joint Statement from MGH and each of the entities marked with an asterisk in Appendix A in accordance with section 14 of the Australian *Modern Slavery Act 2018* and is made by Navitas UK Holdings Limited (Company Number 6009965) in accordance with the United Kingdom's *Modern Slavery Act 2015*.

This statement describes the steps taken by MGH, its continuing wholly owned companies, and companies controlled by MGH, to minimise the risk of modern slavery or human trafficking in their business or supply chains during the reporting period of 1 July 2019 to 30 June 2020.

MGH is a privately held company registered in Australia<sup>1</sup>. MGH is the ultimate parent company of the Navitas Group, including the entities<sup>2</sup> listed in Appendix A<sup>3</sup>. For the purpose of this report we are referring to these entities collectively as Navitas, we or us.

<sup>1</sup> Registered address: Level 26, 101 Collins Street, Melbourne VIC 3000

<sup>2</sup> The names of these legal entities and country of registration and operation are detailed in Appendix A

<sup>3</sup> This Statement extends to Marron Group Holdings Pty Ltd, its wholly owned companies and companies that it controls.

It does not include companies where Navitas works with a partner university in a joint venture structure and does not control.



Navitas acknowledges  
the traditional custodians  
of the lands on which  
we operate and pay our  
respects to their elders  
past and present



# Message from Group CEO

Navitas believes that everyone has the right to live a life free from slavery and human rights abuses. We are taking action, and investing resources, to ensure that our staff and students, and those who are connected to us through our supply chain, are not subject to behaviour or threats that may amount to modern slavery, human trafficking, forced labour or similar human rights abuses.

Through the process of putting together this Modern Slavery and Human Trafficking Statement we have improved our understanding of modern slavery and the risks that exist within our own operations and supply chains.

As a global education organisation, those risks are primarily related to our position as an employer in some high-risk countries, and the recruitment of our students who travel from all over the world to study in our colleges and campuses. We are committed to identifying and addressing modern slavery risks in our operations and supply chains.

This statement outlines our foundational work in this area during FY20 (1 July 2019 to 30 June 2020) and our intention to continuously improve our response to modern slavery risks in FY21 and beyond.

Our vision is to be the best education provider in the world for our students, partners and people. We will lead by example on this important issue and work closely with our university partners, suppliers and recruitment agents to eliminate risks associated with modern slavery in the international education sector.



**Scott Jones**  
Group CEO, Navitas Pty Limited



# About Navitas

Navitas is a global education provider, headquartered in Perth, Western Australia. We work with universities, industry partners and governments to transform lives through education.

Our success is underpinned by our unparalleled international network, our commitment to student experiences and outcomes and a passion for discovering new models of teaching and learning that will improve education now and into the future.

Navitas is a proud Australian company that pioneered an innovative university partnership model of education in Perth in 1994.



**70,000**  
students



More than **120 colleges**  
and campuses across  
global network



Operating in  
**33 countries**



Partnerships with more  
than **30 universities**



**6000**  
employees



Over **\$2million AUD**  
in philanthropic grants  
through Navitas  
Education Trust



# What we do



## University Partnerships

We partner with universities all over the world to offer international and domestic students pathways to higher education. Our students benefit from exceptional support and teaching excellence and our partners benefit from our global resources and international expertise.

We provide managed campus services for many of our partners, enabling them to reach more students in more locations.



## Higher and Vocational Education

Our independent providers offer accredited certificate, diploma, degree and postgraduate programs that equip learners with the skills they need to make valuable contributions to industry and society.

Specialising in creative media and human services disciplines, our world-leading colleges offer a diverse range of programs both across Australia and around the world to meet industry demand and the needs of learners.



## Language and Employability Skills

We deliver English language and testing services and literacy and numeracy programs to help clients develop essential skills.

Our work integrated learning programs offer students the skills and experience needed to maximise their employment prospects and our management and professional development programs are helping to prepare and strengthen the leaders of tomorrow.

# Our vision and values

Our vision is to be the best global education provider in the world for our students, partners and people.

In achieving our vision, we are guided by a strong set of values:



We demonstrate **DRIVE** by achieving and advancing together



We are **ADVENTUROUS** in mind and spirit



We have **CONVICTION** to our purpose and potential



We are **GENUINE** in the way we behave and deliver



We demonstrate **RIGOUR** in enhancing our professional reputation and credibility

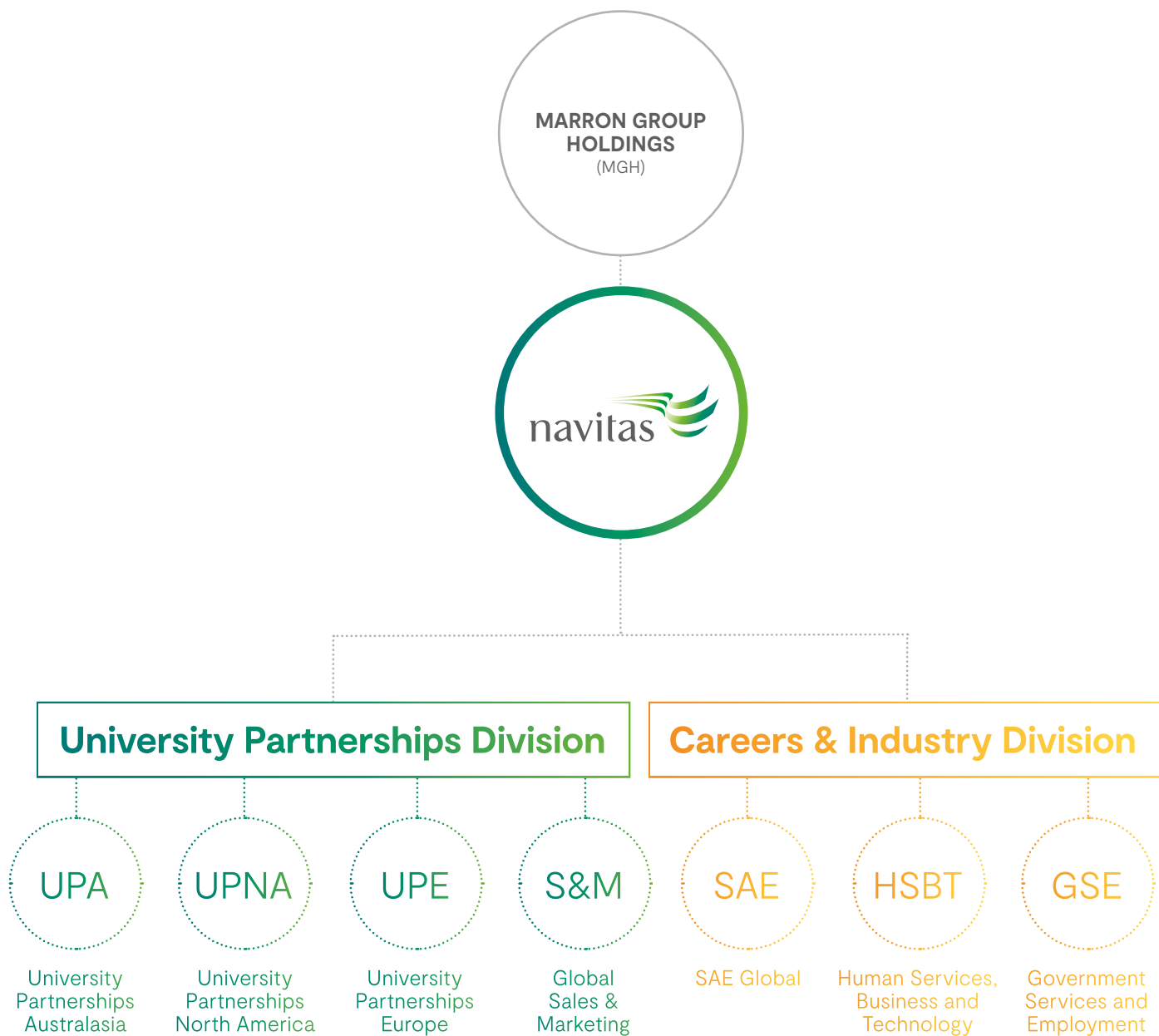


We show **RESPECT** by celebrating, valuing and caring for people and the environment

# **Our Structure, Operations and Supply Chain**



# Our Structure



# Our Operations

## University Partnerships Divisions

Our University Partnerships divisions deliver pre-university, managed campus and university pathway programs designed to increase students' access to higher education and prepare them for future success. University Partnerships courses are delivered via on-campus colleges, through an agreement with a partner university, in a structured environment aimed at maximising student success. Most Navitas pathway colleges operate under the branding of their partner university.

This statement covers the following colleges and campuses in the University Partnerships divisions operating in the period 1 July 2019 – 30 June 2020, as well as the Global Student Success Programs operating in North America at UMass Lowell, UMass Dartmouth, Virginia Commonwealth University, University of New Hampshire, University of Idaho and Florida Atlantic University that closed after the reporting period.

### University Partnerships Australasia

#### Australia



#### New Zealand



#### Sri Lanka



#### Dubai



#### Singapore



### University Partnerships North America

#### Canada



#### United States of America



## University Partnerships Europe

### United Kingdom



### The Netherlands



### Germany



## Careers & Industry

The Navitas Careers & Industry division delivers higher education, vocational education and training, language, literacy, numeracy and employability skills programs and services to more than 25,000 learners worldwide.

Through its global network of 60 campuses in 20 countries, this division equips learners with the growth opportunities, real-world experiences and qualifications they need to develop skills, build confidence, secure work and carve successful long-term careers.

This statement covers the following operations in the Careers & Industry division.

## SAE Global



## Human Services, Business and Technology



## Government Services and Employment



## Navitas Education Trust

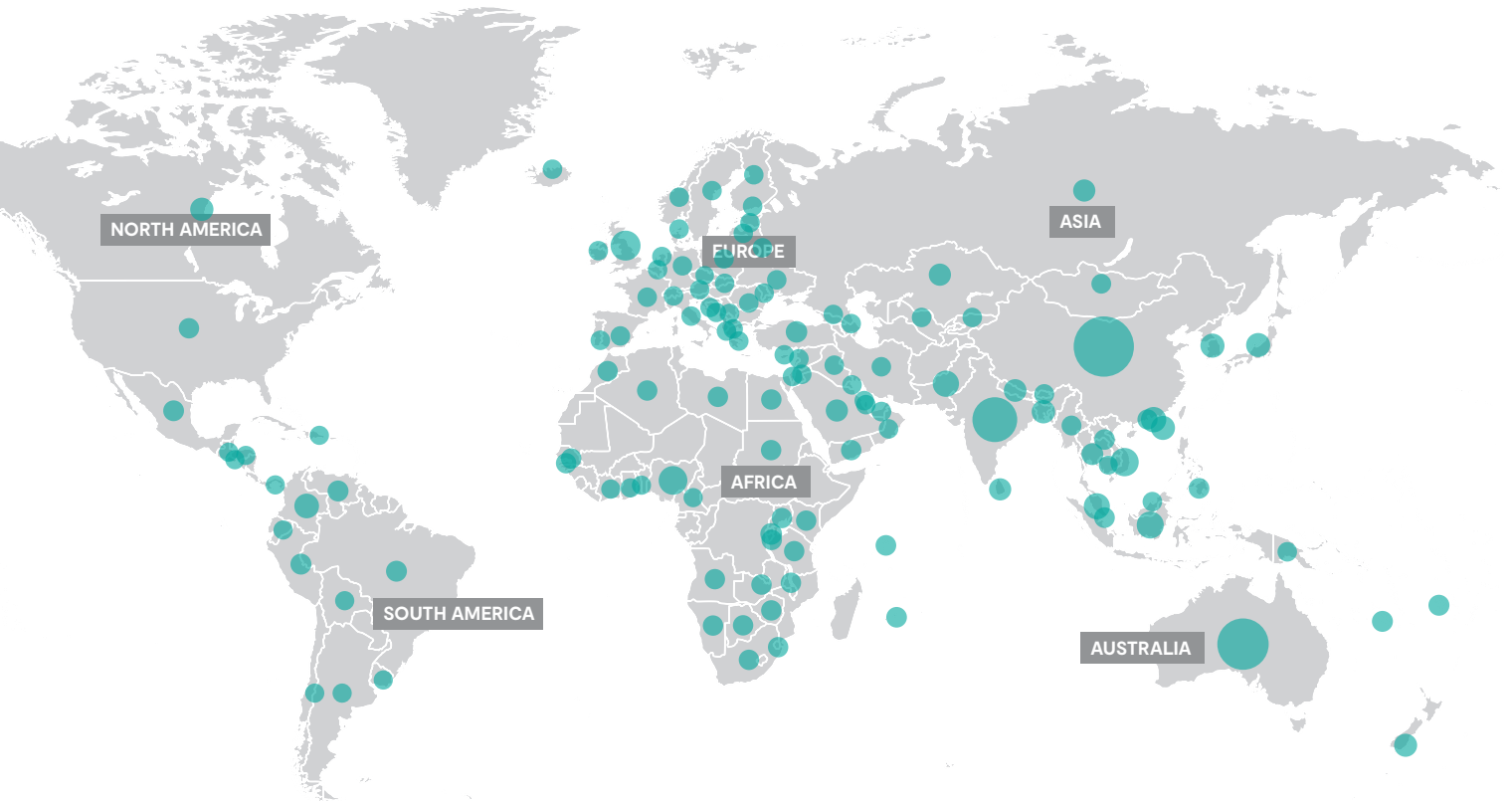
In addition to our commercial operations, the Navitas Education Trust (NET) was established in 2013 to support charitable organisations and activities with an education focus. Since 2014, the NET has made grants of almost \$2.5million to help numerous not-for-profit organisations deliver positive educational outcomes around the world.

For more information about the Navitas Education Trust please refer to our **NET FY20 Summary Report**.

# Our Supply Chain

Our most significant suppliers are the education agents (also referred to as education advisors) we partner with to recruit international students into our programs. Educational agents provide students with information about options for studying and living overseas and, in many cases, support them with their study and visa applications. We have 5,000 contracted agents in 125 countries around the world.

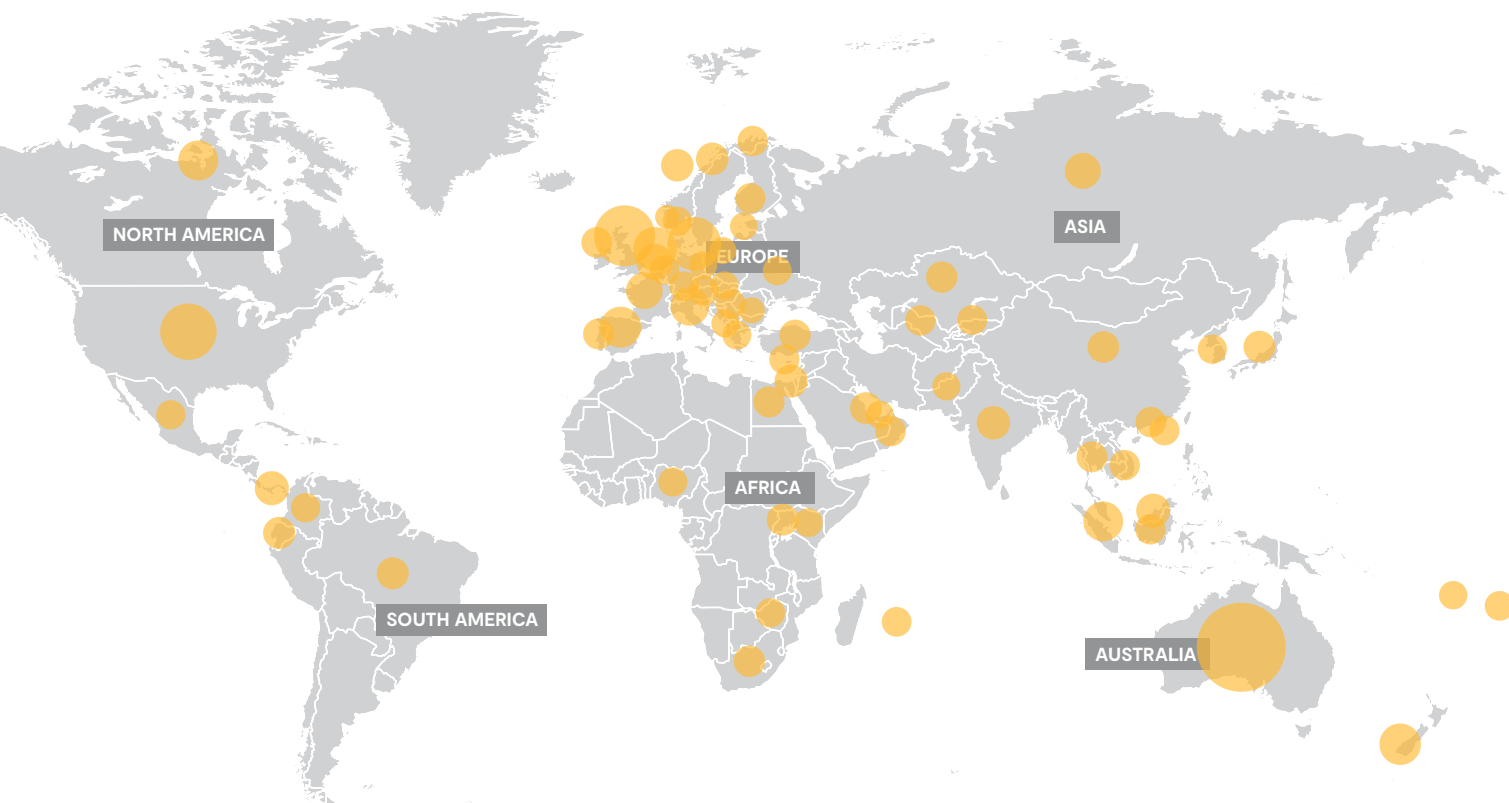
## Navitas education agents by country



Other than expenditure on our educational advisor commissions and incentive programs, Navitas purchases products such as teaching and learning materials, office supplies, audio visual equipment, IT equipment, college fit out materials and merchandise and promotional materials which include branded clothing. Services we procure include marketing and advertising services, IT services, leasing of office space, cleaning, catering, travel and accommodation.

Our businesses source from a range of locations with the largest volume of spend sourced from Australia, United States, United Kingdom, Canada and Singapore. In the financial year ending 30 June 2020, Navitas paid approximately AU\$480m to its 8,300 tier 1<sup>4</sup> suppliers.

### Navitas suppliers by country



<sup>4</sup> Tier 1 suppliers are suppliers that provide products or services directly to Navitas.

# **Our Modern Slavery Risks**

The international education sector is a comparatively low risk sector in the context of modern slavery and human trafficking. Because Navitas does not produce, manufacture, distribute or sell consumer products, our risk profile is reduced.

We are proud of the relationships we have built with our suppliers, education agents and partners, many of which are long-standing over several decades, and we have a high level of confidence in their compliance with our own ethical standards. We take our responsibilities seriously and we are committed to ongoing measures to identify, evaluate, and reduce risks relating to modern slavery and human trafficking.

**We have identified four key risk areas relating to modern slavery that we are taking action to address:**



Education Agents



Our supply chain



Our operations in higher-risk countries



Navitas Education Trust





## Education Agents

International education agents play an essential role in ensuring Navitas and other organizations continue to provide life-changing learning opportunities for students around the world. Around 80% of our international students use an agent to help them find the right course in the right city and navigate complex application and visa processes.

Research has identified that migrants who rely on third parties (such as migration agents or recruitment agents) are at higher risk of modern slavery, human trafficking and forced labour<sup>5</sup>. Evidence suggests trafficking is facilitated using student, visitor/tourist or working holiday visas<sup>6</sup>.

While Navitas seeks to only work with agents who adhere to high ethical standards, and implements due diligence processes to ensure this is the case, we recognise the risk that agents who recruit students for overseas education institutions may be directly or indirectly involved in modern slavery and human trafficking practices; for example, knowingly or unknowingly assisting a trafficker to obtain a student visa for a victim of trafficking, forced labour or other forms of indentured service.



## Our Supply Chain

As a global education provider, Navitas purchases a wide range of goods and services. All products and services carry the risk of modern slavery practices in their supply chains. However, the risk of modern slavery varies depending on the product or service procured or the geography procured from.

We have identified the following higher risk product or service categories that are relevant to our operations:

- Electronic equipment – audio-visual equipment, laptops, computers and mobile phones
- Cleaning services – which are often sourced through labour hire companies and employ migrant workers
- Branded promotional goods, including clothing
- Office and teaching supplies
- Construction (of new campuses)

In terms of geographic modern slavery risks, Navitas sources from 69 countries and we work with 30 suppliers located in countries within the Global Slavery Index 2018<sup>7</sup> top 50 for prevalence of modern slavery.

<sup>5</sup> International Organisation for Migration and the Minderoo Foundation Walk Free Initiative (2019) Migrants and their vulnerability to human trafficking, modern slavery and forced labour

<sup>6</sup> Coalition Against Trafficking in Women Australia (2019) CATWA Submission to the Draft General Recommendation on Trafficking of Women and Girls in the Context of Global Migration.

<sup>7</sup> Minderoo Foundation Walk Free Initiative (2018) Global Slavery Index 2018. Available from: [www.globalslaveryindex.org](http://www.globalslaveryindex.org)





## RISK AREA #3

### Our operations in higher-risk countries

The risk of modern slavery varies by geography, depending on local laws, customs and practices. Navitas engages staff and contractors in six countries<sup>8</sup> that are considered to have high prevalence of modern slavery, as measured by the Global Slavery Index 2018. There is a risk that our staff or contractors in these countries may be subjected to modern slavery practices such as excessive working hours, unpaid work, underpayment, or forced labour.



## RISK AREA #4

### Navitas Education Trust

The NET conducts due diligence on all charities it supports and only makes grants to Australian registered charities who are required to comply with the Australian Charities and Not-for Profits Commission External Conduct standards. These standards require charities to comply with Australian modern slavery laws regardless of where they are operating.

Charities in receipt of NET funding often partner with local organisations to deliver projects on the ground. There is a risk these local organisations may not be operating to the same legal and ethical standards as those based in Australia which increases the risk that grant recipients could be directly or indirectly contributing to modern slavery or human trafficking practices. The risk is increased if local partners are based in countries where there is a higher prevalence and acceptance of modern slavery practices.

In FY20 the NET granted \$389k AUD to organisations delivering educational projects in Nepal, India, Australia and Vietnam. None of these countries are considered to have a high prevalence of modern slavery, as measured by the Global Slavery Index 2018.

<sup>8</sup> Pakistan, Greece, Nigeria, Kenya, Malaysia and Turkey.

# Impact of COVID-19

Navitas has taken advantage of extended reporting deadlines for the publication of its Modern Slavery Statement due to the COVID-19 pandemic.

## Operations

As the coronavirus pandemic spread around the world and borders were closed, our attention turned firstly to the health, safety and welfare of our staff and students; and secondly to the sustainability of our business during the crisis. This included a global transition to online delivery of our programs and significant changes to our structure.

These impacts necessitated an extension of the timeframes to complete a number of actives we had planned as part of our response to our modern slavery risks, including:

- Reviewing and updating our education advisor agreements
- Awareness raising of modern slavery among our leadership and staff
- More in-depth review of our supply chain data to understand areas of higher risk

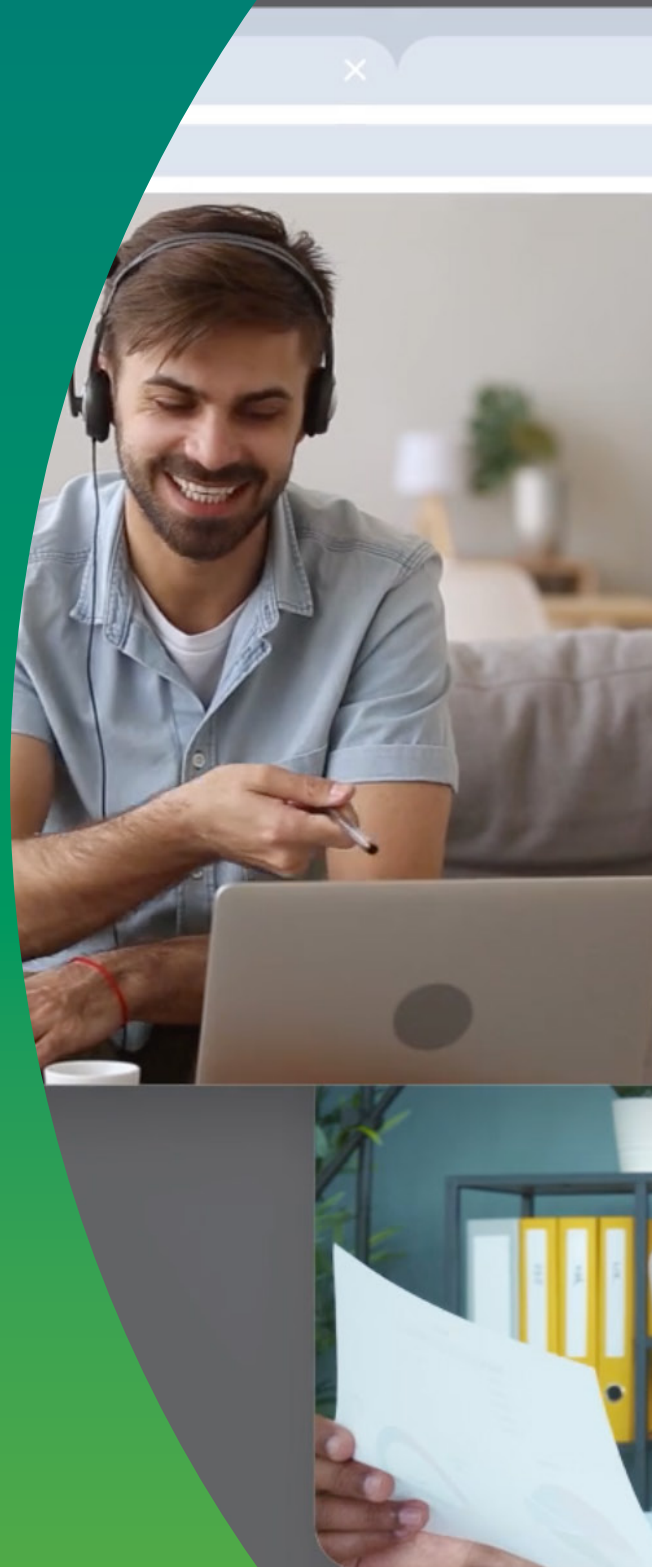
These activities continue in FY21.

## Supply Chains

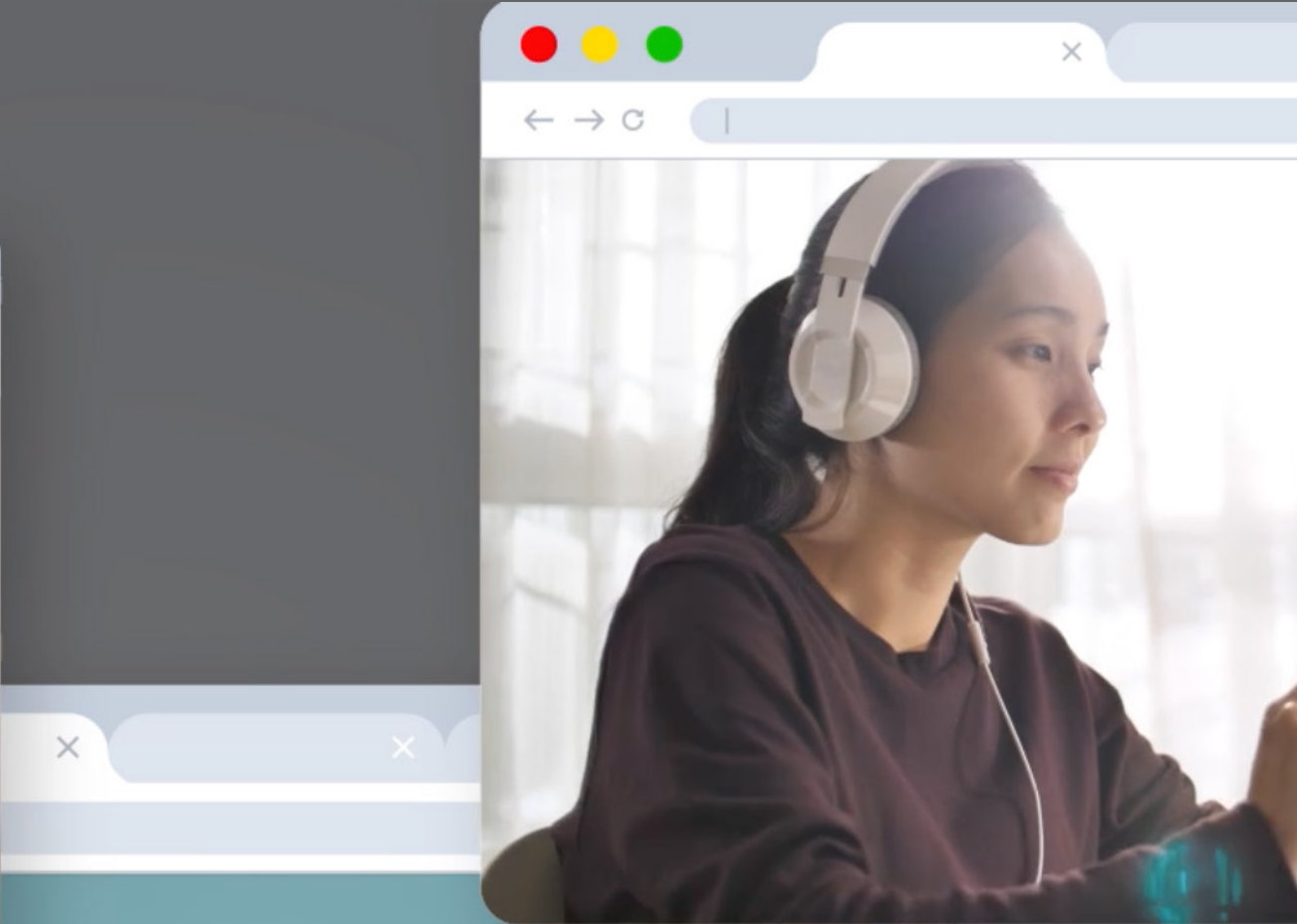
Due to the impact of COVID-19 on the international education sector, there has been an increased focus on cost reduction across the sector. We are cognisant of the risk that lower cost suppliers may be more likely to underpay or exploit their own workers, which in turn increases the risk of Navitas indirectly contributing to non-compliance with labour standards in its supply chain.

In response to the health and safety risks of COVID-19, Navitas sourced hand sanitizer and protective masks for all sites. Sourcing of these products was often undertaken by local business units with limited formal due diligence over suppliers due to the urgency of the purchasing requirement.

We also increased expenditure on cleaning across all sites. The cleaning sector has been identified as being high risk for modern slavery due to the use of complex and multilayered labour hire and subcontracting arrangements and the use of migrant workers<sup>9</sup>.



<sup>9</sup> Australian Centre for Corporate Responsibility (2020) Modern Slavery, Subcontracting and Commercial Cleaning.



# **Our Response to Modern Slavery Risks**

All entities owned and controlled by Navitas operate in the education sector, have similar supplier profiles and have been assessed as having the same risks of modern slavery in their supply chain. As a result, actions taken to address our identified modern slavery risks apply to all Navitas owned and controlled entities.

## Governance and policy

The MGH Board and Navitas Executive Leadership are aware of our modern slavery and human trafficking risks, mitigating actions and reporting obligations, and will continue to support us as we make improvements and work to reduce risks from our operations.

The Navitas policy framework is designed to embody what we stand for as an organisation, providing guidance to help us make the right decisions and advice on what to do if we witness behaviour that does not reflect our values.

The table below outlines the policies that are relevant in the context of modern slavery.

<b>Values in Action (Code of Conduct)</b>	<p>Outlines how we demonstrate the Navitas values through our behaviour. It symbolises what we stand for as an organisation and sets expectations for our employees and partners.</p> <p>It includes how to report non-compliant, illegal or unethical behaviour or actions via our <a href="#">Speak Up portal</a>.</p>
<b>Whistleblowing Policy</b>	<p>Defines reportable conduct and provides details of how people can report such conduct including via our Speak Up portal (see above).</p>
<b>Environmental, Social and Governance (ESG) Policy</b>	<p>Outlines our environmental, social, and corporate governance principles, including:</p> <ul style="list-style-type: none"> <li>· Supporting the protection of internationally proclaimed human rights, in particular to support initiatives to promote access to a quality education in disadvantaged communities</li> <li>· Upholding freedom of association and the effective recognition of the right to collective bargaining</li> <li>· Promoting the elimination of all forms of forced and compulsory labour, the effective abolition of child labour, and the elimination of discrimination in respect of employment and occupation.</li> </ul> <p>Employees are required to take these principles into account in their decision making.</p>
<b>Group Delegations of Authority</b>	<p>This policy has been updated to embed the requirement for all staff to take Environmental, Social and Governance (ESG) principles into account when exercising delegated authority.</p>

In FY21 we plan to establish a governance framework to ensure the appropriate oversight of modern slavery and human trafficking risk management at a Group and Divisional level. Our policy framework will be reviewed, and new policies will be introduced if required. We also plan to update our Values in Action and Environmental, Social and Governance policies to strengthen the focus on modern slavery and human trafficking.

# Action to mitigate identified risks



## Education Agents

### ACTION TAKEN

#### Agent management strategy:

Our agent management strategy outlines how Navitas works with education agents to protect the interests of our students and the integrity of our programs and university partnerships.

Central to this strategy are processes governing the identification, appointment, management and monitoring of our education agents to ensure we only work with agents that act ethically, honestly and in the best interest of the student.

We have a system in place for employees to raise concerns over agent behaviour, triggering further investigation. Clear exit clauses in our agent contracts allow Navitas to immediately terminate our relationship if an agent is found to be engaging in false or misleading recruitment practices, unethical behaviour, or not complying with local laws and regulations governing education agents.

#### Student monitoring and follow-up:

Student services teams in each of our colleges and campuses around the world work closely with students throughout their journey with Navitas, from initial application, through to enrolment, study, and graduation. If a student accepts a place in one of our programs but does not enrol on campus as expected, or enrolls but subsequently fails to attend, our student services teams will follow up with the student immediately. If a student cannot be located, or does not enrol for the program at all, the student is reported to local immigration authorities, in line with our obligations.

### LOOKING AHEAD

As a priority, Navitas will further mitigate the modern slavery risks associated with our use of education agents. We intend to:

1. Ensure appropriate modern slavery clauses are incorporated into all our agent contracts.
2. Strengthen our agent monitoring systems to include consideration of modern slavery and human trafficking risk indicators, such as the non-enrolment of a student.
3. Ensure that information relating to agent behaviour is aggregated and shared globally.
4. Improve awareness of modern slavery and human trafficking risks among our employees, particularly those that work with agents and students.
5. Improve agent awareness of modern slavery and human trafficking risks and how they may inadvertently contribute to modern slavery and human trafficking
6. Provide students with information about modern slavery and human trafficking and where they can access information and support.

## RISK AREA #2

### Our Supply Chain

#### ACTION TAKEN

Navitas conducted a high-level analysis of our supply chain and risk assessment to identify the potential higher modern slavery and human trafficking risk areas set out above. This exercise identified some issues with our data which prevented more detailed analysis.

We also reviewed our procurement practices and identified inconsistent approaches taken to due diligence and supplier selection across our operations.

The Environmental, Social and Governance policy was introduced in FY20 which requires staff to consider key principles in their decision making, including requirements to treat suppliers fairly and support the protection of internationally proclaimed human rights.

Anti-slavery, child labour and anti-discrimination clauses have been included in new supplier agreements requiring Navitas Group CEO or Board approval since FY20.

#### LOOKING AHEAD

As a priority we are reviewing and updating our supplier data to enable a more detailed supply chain analysis and risk assessment to be undertaken. This will help inform priority sectors and suppliers for action.

Navitas will introduce a Group purchasing/ procurement policy setting out procurement principles including due diligence requirements (which will include consideration of human rights, modern slavery, environmental and social factors), value for money considerations and supplier monitoring expectations. The policy will require anti-slavery, child labour and anti-discrimination clauses to be incorporated into all new supplier contracts.

We will provide training to relevant staff members with procurement responsibilities. This will encompass raising awareness of modern slavery and human trafficking risks and training staff on applicable policies and procedures.

## RISK AREA #3

### Our operations in higher-risk countries

#### ACTION TAKEN

Navitas Values in Action sets out that Navitas is committed to treating all our people with respect, dignity, courtesy, honesty and fairness, and with the proper regard for the rights, safety and welfare of all. We strive to make decisions fairly, impartially and promptly, while observing all relevant information, legislation, policies and procedures.

We expect our staff to comply with all relevant laws and regulations in every country of operation at all times and to ensure written agreements formally document the organisation/employee relationship.

Our Environmental, Social and Governance Policy requires staff to operate in accordance with the following principles relevant to the employment of staff:

- Support the protection of internationally proclaimed human rights
- Uphold freedom of association and the effective recognition of the right to collective bargaining
- Promote the elimination of all forms of forced and compulsory labour, the effective abolition of child labour, and the elimination of discrimination in respect of employment and occupation
- Support the payment of competitive wages and benefits to employees and stakeholders.

In addition to these overarching policies, we also have policies governing recruitment and selection.

#### LOOKING AHEAD

In FY21 we plan to review our employment practices in the countries identified as a higher risk of modern slavery practices to gain assurance that we are not inadvertently causing or contributing to modern slavery practices.

We will also review our suite of HR policies and procedures to ensure appropriate consideration of human rights and modern slavery.

## RISK AREA #4

### Navitas Education Trust

Once we have addressed risks associated with our operations, educational advisor network and supply chains, we will prioritise the identified risks in the NET. This will include strengthening our due diligence criteria and requiring applicants to demonstrate the processes and controls they have in place to oversee the activities of any third-party organisations they partner with.

# Measuring our progress

As an organisation we have taken the first steps along our journey to eliminate the risks of modern slavery and human trafficking in our operations and supply chain. These important first steps have helped us to identify our risks and raised awareness about these important issues within our organisation.

The reviews we have undertaken have identified the four key risk areas that need attention, resources and investment; and established a baseline from which we can measure improvement.

As our modern slavery and human trafficking due diligence and remediation processes mature and evolve, we will introduce key performance indicators to measure the success of the actions taken.

## Reporting against our policy framework

The actions we have taken so far have given us a policy framework which has embedded our expectations and processes related to modern slavery and human trafficking into the business. We will continue to develop and enhance this framework into the future.

ESG performance metrics have been developed to measure our performance against these principles. We reported FY20 performance to the Board in August 2020.

In FY20 we received six reports from whistleblowers. Disclosures raised concerns about staff conduct and workplace health and safety concerns. All reports capable of being addressed under the Whistleblower Policy were investigated and addressed in an appropriate manner. A summary of whistleblower reports is provided to the Board twice yearly with any significant matters being reported immediately.

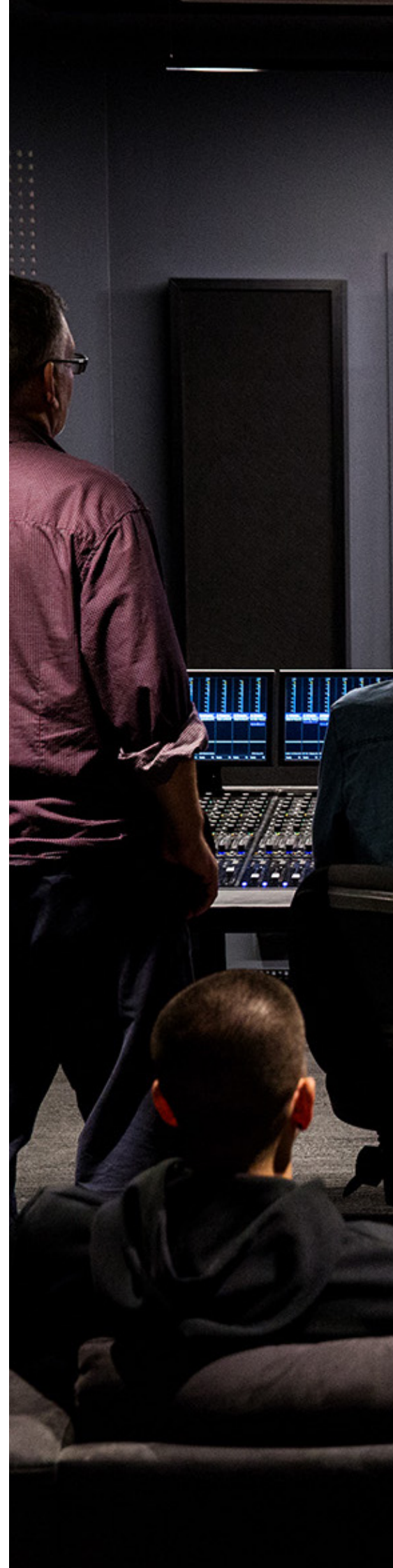
## Consultation

In preparing this Modern Slavery and Human Trafficking Statement, Navitas has consulted With MGH Board members and the Navitas Executive Leadership Team (including each Divisional CEO who are also directors of one or more subsidiary companies owned or controlled by Navitas in their region). Input has also been sought from Navitas' Group Legal & Secretariat, Group Risk, Group HR and Group Finance functions

This Modern Slavery and Human Trafficking Statement was approved by the Board of Directors of MGH on 17 February 2021.



**Rod Jones**  
Chairman  
Marron Group Holdings Pty Ltd







## Appendix A. Details of companies covered by this Modern Slavery Statement

\* Entities marked with an asterisk (\*) below are reporting entities that issue this statement as a joint modern slavery statement for the purposes of section 14 of the Modern Slavery Act 2018.

Entity Name	Trading Name(s)	Location
ACL Pty Ltd	Not applicable	Australia
Australian Campus Network Pty Limited	La Trobe University Sydney Campus	Australia
Australian College of English Pty Ltd	Not applicable	Australia
Cadre Design Pty. Limited	Not applicable	Australia
Colleges of Business & Technology (NSW) Pty Ltd	Not applicable	Australia
Colleges of Business & Technology (WA) Pty Ltd	Curtin College	Australia
Cytech Intersearch Pty Limited	Not applicable	Australia
Educational Enterprises Australia Pty Ltd	Eynesbury College	Australia
Educational Services Pty Ltd	Not applicable	Australia
Hawthorn Learning Pty Limited	Hawthorn Melbourne	Australia
Health Skills Australia Pty Ltd	Not applicable	Australia
IBT (Canada) Pty Ltd* ACN 117 527 143	Not applicable	Australia
IBT Education Pty Ltd	Not applicable	Australia
IBT (Sydney) Pty Ltd	Not applicable	Australia
Learning Information Systems Pty Limited	Studylink	Australia
LM Training Specialists Pty Ltd	Not applicable	Australia
Marron Bidco Aus Pty Ltd* ACN 631 573 763	Not applicable	Australia
Marron Group Holdings Pty Ltd* ACN 631 941 403	Not applicable	Australia
Marron Group Midco 1 Pty Ltd* ACN 633 571 052	Not applicable	Australia
Marron Group Midco 2 Pty Ltd* ACN 631 562 582	Not applicable	Australia
Melbourne Institute of Business and Technology Pty Ltd	Deakin College	Australia
Navitas Bundoora Pty Ltd	La Trobe College Australia	Australia
Navitas Pty Limited* ACN 109 613 309	Navitas	Australia
Navitas America Pty Ltd	Not applicable	Australia
Newcastle International College Pty Ltd	Newcastle International College	Australia
Navitas College of Health Pty Ltd	Not applicable	Australia
Navitas College of Public Safety Pty Ltd	Not applicable	Australia
Navitas English Pty Limited	Navitas English	Australia
Navitas English Services Pty Limited	Navitas English	Australia
Navitas Global Pty Ltd	Not applicable	Australia
Navitas LIS Holdings Pty Ltd	Not applicable	Australia
Navitas Professional Pty Ltd	Not applicable	Australia
Navitas Professional Institute Pty Ltd	Australian College of Applied Psychology	Australia
Navitas Professional Training Pty Ltd	Navitas Professional	Australia
Navitas SAE Holdings Pty Ltd* ACN 141 128 869	Not applicable	Australia
Navitas SAE (UK) Holdings Pty Ltd* ACN 087 590 010	Not applicable	Australia

Entity Name	Trading Name(s)	Location
Navitas USA Pty Ltd	Not applicable	Australia
Navitas Ventures Pty Ltd	Not applicable	Australia
National Excellence in School Leadership Institute Pty Ltd	Not applicable	Australia
SAE Institute Pty Limited	SAE Creative Media Institute, Qantm College	Australia
Queensland Institute of Business and Technology Pty Ltd	Griffith College	Australia
South Australian Institute of Business and Technology Pty Ltd	Not applicable	Australia
Sydney Institute of Business and Technology Pty Ltd	Western Sydney University – Sydney City Campus	Australia
The Australian Centre for Languages Pty Ltd	Not applicable	Australia
Workplace Training and Advisory Aust. Pty Ltd	Australian School of Applied Management Women and Leadership Australia Women & Leadership International Women & Leadership New Zealand Institute of National Leadership GPS Learning The National Excellence in School Leadership Initiative	Australia
SAE Austria GmbH	SAE Creative Media Institute	Austria
SAE Institute Belgium SPRL	SAE Creative Media Institute	Belgium
Fraser International College Limited	Fraser International College	Canada
International College of Manitoba Limited	International College of Manitoba	Canada
SAE Institute Inc	SAE Creative Media Institute	Canada
1198790 B.C Ltd	Not applicable	Canada
International College of Toronto Limited	Ryerson University International College (pending)	Canada
Wilfrid Laurier International College Limited	Not applicable	Canada
Beijing Navitas Education Consulting Co. Limited	Not applicable	People's Republic of China
School of Engineering France SARL	SAE Creative Media Institute	France
SAE Germany Holdings GmbH	Not applicable	Germany
SAE-Institute GmbH	SAE Creative Media Institute	Germany
SAE Alumni GmbH	Not applicable	Germany
Navitas Germany GmbH	Lancaster University Leipzig	Germany
SAE HELLADOS Monoprosopi E.P.E.	SAE Creative Media Institute	Greece
Navitas Eduservices Private Limited	Not applicable	India
Anuvac Confab Worldwide Private Limited	Not applicable	India
PT. SAE Kreatif Media Indonesia	SAE Creative Media Institute	Indonesia
SAE Italia S.R.L. International Technology College	SAE Creative Media Institute	Italy
Ausedken Limited	Not applicable	Kenya
Study Overseas (Mauritius) Holding Limited	Not applicable	Mauritius
Navitas Netherlands B.V.	The Hague Pathway College, Twente Pathway College	The Netherlands
SAE Technology Group Holdings B.V.	Not applicable	The Netherlands
SAE Netherlands B.V.	SAE Creative Media Institute	The Netherlands
Navitas Nigeria Pty Limited	Not applicable	Nigeria
Christchurch Institute of Business and Technology Limited	UC International College	New Zealand

Entity Name	Trading Name(s)	Location
Christchurch College of English Limited	Christchurch College of English	New Zealand
School of Audio Engineering (N.Z.) Limited	SAE Creative Media Institute	New Zealand
Curtin Education Centre Pte Ltd.	Curtin Singapore	Singapore
Navitas Asia Holdings Pte Ltd	Not applicable	Singapore
Navitas Education Centre Pte Ltd	Not applicable	Singapore
SAE Institute Pte Ltd	Not applicable	Singapore
SAE Institute, izobrazevanje ma podrocju audio, video in filmske tehnike, d.o.o., Ljubljana	Not applicable	Slovenia
SAE Technology Group Spain SL	SAE Creative Media Institute	Spain
Zunzil Invest S.L.	Not applicable	Spain
Australian College of Business and Technology (Private) Limited	Not applicable	Sri Lanka
School of Audio Engineering Sweden Aktiebolag	SAE Creative Media Institute	Sweden
SAE Institute Switzerland AG	SAE Creative Media Institute	Switzerland
SAE Gessellschaft fur Studiotechnik mbH	Not applicable	Switzerland
Marron Group UK Holdings Limited	Not applicable	United Kingdom
Birmingham City International College Ltd	Birmingham City International College	United Kingdom
Cambridge Ruskin International College Ltd	ARU College (trading as Cambridge Ruskin International College until 1 June 2020)	United Kingdom
Edinburgh International College Ltd	Not applicable	United Kingdom
Employment Overseas Ltd	Not applicable	United Kingdom
HIBT Ltd	Hertfordshire International College	United Kingdom
International College Portsmouth Ltd	International College Portsmouth	United Kingdom
Learning Information Systems Limited	Studylink	United Kingdom
Leicester Global Study Centre Limited	Leicester Global Study Centre	United Kingdom
London Brunel International College Limited	London Brunel International College	United Kingdom
Navitas UK Holdings Limited	Not applicable	United Kingdom
Northampton IC Limited	UNIC	United Kingdom
Plymouth Devon International College Ltd	University of Plymouth International College	United Kingdom
The International College at Robert Gordon University Ltd	Not applicable	United Kingdom
SC170551 Limited	Not applicable	United Kingdom
SC255447 Limited	Not applicable	United Kingdom
SAE Education Limited	SAE Creative Media Institute	United Kingdom
Women and Leadership International (UK) Limited	Not applicable	United Kingdom
Navitas SAE FZ-LLC	Not applicable	United Arab Emirates
Navitas Middle East FZ-LLC	Murdoch Dubai	United Arab Emirates
Navitas Bowling Green LLC	Not applicable	United States of America
Navitas Durham LLC	University of New Hampshire Global Student Success Program	United States of America
Navitas South Prince George LLC	Richard Bland College of William & Mary Global Student Success Program	United States of America

Entity Name	Trading Name(s)	Location
Navitas Boston LLC	UMass Boston Global Student Success Program	United States of America
Navitas Moscow LLC	University of Idaho Global Student Success Program	United States of America
Navitas New York LLC	Queens College Global Student Success Program	United States of America
Navitas Boca Raton LLC	Florida Atlantic University Global Student Success Program	United States of America
Navitas Lowell LLC	UMass Boston Global Student Success Program	United States of America
Navitas Dartmouth LLC	UMass Dartmouth Global Student Success Program	United States of America
Navitas Richmond LLC	Virginia Commonwealth University Global Student Success Program	United States of America
Navitas USA General Partnership	Not applicable	United States of America
Navitas USA Holdings LLC	Not applicable	United States of America
SAE Institute of Technology (San Francisco) Corp	Not applicable	United States of America
SAE Institute of Technology (New York) Corp	SAE Creative Media Institute	United States of America
SAE Institute of Technology (Nashville) Corp	SAE Creative Media Institute	United States of America
SAE Institute of Technology (Miami) Corp	SAE Creative Media Institute	United States of America
SAE Institute of Technology (Los Angeles) Corp	Not applicable	United States of America
SAE Institute of Technology (Chicago) Corp	SAE Creative Media Institute	United States of America
SAE Institute of Technology (Atlanta) Corp	SAE Creative Media Institute	United States of America
Ex'pression Centre for New Media, Inc	SAE Expression College	United States of America
SAE Institute Group, Inc	Not applicable	United States of America
Learning Information Systems, Inc	Not applicable	United States of America
National Excellence in School Leadership Institute, LLC	Not applicable	United States of America
NVT Consulting Company Limited	Not applicable	Vietnam



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