

Modern Slavery Statement 2023



MEGT

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1. MEGT commitment statement

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

This statement is made in accordance with the Australian Modern Slavery Act 2018 (Cth) and is relevant to the reporting period ending 30 June 2023. It describes the steps and approaches taken during FY23 to identify and minimise risks of exposure to modern slavery across the organisation and supply chain.

2. MEGT business structure

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

The other entities associated with MEGT are:

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

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



3. About MEGT

MEGT is a not-for-profit organisation which has been supporting employers, apprentices, trainees, job seekers and students since 1982. Originally known as the Outer Eastern Apprenticeship Scheme, by 1999 MEGT had commenced operations in New South Wales.

We now operate from our head office in Ringwood VIC, and from a total of 66 offices in every state. MEGT provides Apprenticeship Network Provider (ANP) services, Recruitment Management Services (RMS) as a registered Group Training Organisation (GTO), and Employment Services including those on behalf of Workforce Australia (WFA) and various state-based contracts.

GTO services include:

- End-to-end apprenticeship and traineeship program management
- High-quality, work-ready apprentice and trainee candidates
- Fast, easy apprentice and trainee payroll services
- Ongoing mentoring and support

As of June 30, 2023, MEGT employs 638 staff, five directors, six contractors and two qualified labour hires. The business, via its GTO service offering, also employs 323 apprentices, 348 trainees and 141 school-based trainees.

3.1 Purpose and values



Growth

We invest in our people which is what grows our business.



Inclusion

We respect the experiences, opinions, and contributions of all individuals.



Courage

We are brave enough to challenge ourselves and others.



Innovation

We embrace change to create meaningful solutions.



Collaboration

We share our knowledge and skills so that all of us can achieve.



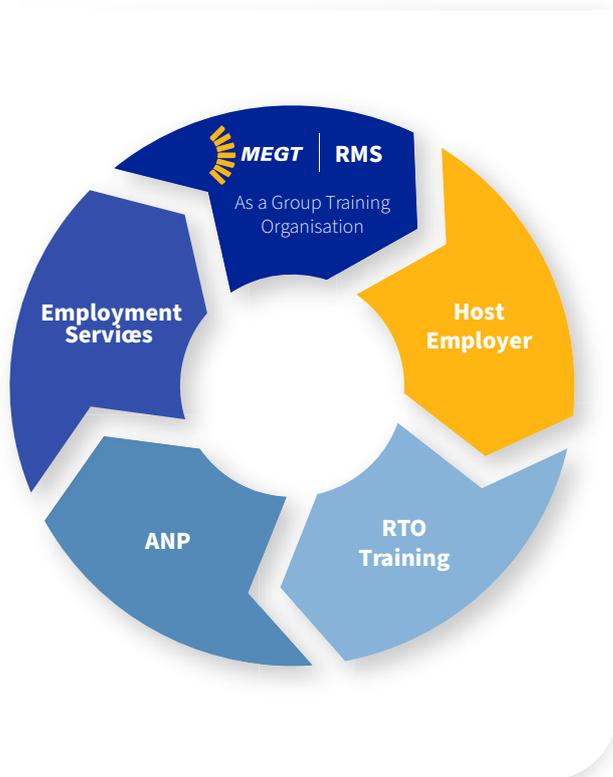
Sustainability

We commit to making business decisions that leave our world a better place.

Mission: ‘Partnering with our customers, we facilitate equal access to skills, training and careers by attracting and developing an exceptional team.’

Vision: ‘Our vision is to be a leader in creating education, skills and career outcomes.’

3.3 What we do



Service Guide

- MEGT is a Group Training Organisation (GTO) which employs apprentices and trainees and places them with host employers
- Host employers provide on-the-job training, supervision, and experience. In turn, the apprentice or trainee provides the host employer with skills and services
- A Registered Training Organisation (RTO) provides formal off-site training to complement the apprentice or trainee's practical experience
- For apprentices or trainees engaged directly by employers, the Apprentice Network Provider (ANP) administers the Training Contract and provides ongoing support
- Employment Services, via Workforce Australia (WFA) service offerings and state-based contracts, offers a range of programs including *I Got Brushed, I Got Built, I Construct, Built by Jill, Empowering Pathways into Aged Care, SA Test a Trade, Aged Car Potential* and more

Our core service is to empower communities to improve access to local career and development opportunities. MEGT is committed to providing quality employment solutions for all Australians, and to help businesses, apprentices and trainees get the most from Australian Apprenticeship Support Network (AASN) services.

Recruitment and Management Services (RMS)

Our Recruitment and Management Services (RMS) team operates under a GTO (Group Training Organisation) model and provides expertise in all aspects of apprentice and trainee management, including:

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

Apprenticeship Network Provider (ANP)

We are an Apprenticeship Network Provider (ANP) contracted by the Department of Employment and Workplace Relations (DEWR) to provide Australian Apprenticeship Support Network (AASN) services, including:

- Sign-up and registration of apprentices and trainees
- Assistance with government financial incentives which may be available
- Accurate and efficient processing of Training Contracts and incentive claim forms
- Access to a free online Job Board and employer/job seeker toolkits
- Easy online access to apprentice and trainee records
- Ongoing contact and support for employers, apprentices, and trainees

MEGT has a dedicated local presence in every state, backed by national administration teams that continuously exceed Government quality and compliance benchmarks.

Employment Services

Our Employment Services team provides job seekers with a range of programs and qualifications pathways across several industries. All are designed to either kickstart a job seekers' career, or to help provide access to more skills training and qualifications in their chosen field.

Employment Services programs include Workforce Australia (WFA) services in Western Melbourne and Transition to Work (TtW) services in the Gold Coast employment region on behalf of DEWR. MEGT has also facilitated several training programs on behalf of various state governments including *I Got Brushed*, *I Got Built*, *Built by Jill*, *Empowering Career Options* and more. These programs are designed to assist disadvantaged job seekers including First Nations candidates, young Australians, people with disability and long-term unemployed.

Group Training Services

As a registered GTO, we know the value and productivity that apprentices and trainees can add to the workforce. We offer a 'whole-of-business' approach, including:

- Workforce planning, skills gap analyses and budgeting
- Identification of opportunities for apprentices or trainees to join the workforce
- Sourcing, screening, onboarding, payroll, administration, and reporting
- Ongoing management of work performance, health and safety and training requirements

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

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

4. Approach to governance

The MEGT Board comprises five directors (including Chair), with all being independent Non-Executive Directors. The Board is responsible for monitoring the strategic direction of MEGT and ensuring management recognises and complies with all legal and social obligations. The Board has established three committees to monitor and fulfil its obligations:

- Remuneration and Governance Committee
- Finance and Audit Committee
- Strategy and Risk Committee

The role of setting and managing responsibilities with regards to the issue of modern slavery has been assigned to the Senior Management and Executive team and is formally directed by the Strategy and Risk Committee for oversight. This allows for risk identification, management, and assessment to be continually developed and improved, as monitored by our Board of Directors.

MEGT operates in an ethical and transparent manner, investing in staff development, strong quality assurance and risk management frameworks. Organisationally, the safety, quality, and performance of our services are reviewed through a prism of risk-based analyses to continuously improve.

MEGT has received accreditation for ISO9001 and ISO27001, both of which are underpinned by risk-based methodologies. As an illustration of our ongoing commitment to information security, MEGT also holds Right Fit For Risk (RFFR) cyber security certification for the protection of information and data collected and stored as part of the administration of its programs. This includes programs delivered with the assistance of external service providers.

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

Our overall risk-based approach is promoted through:

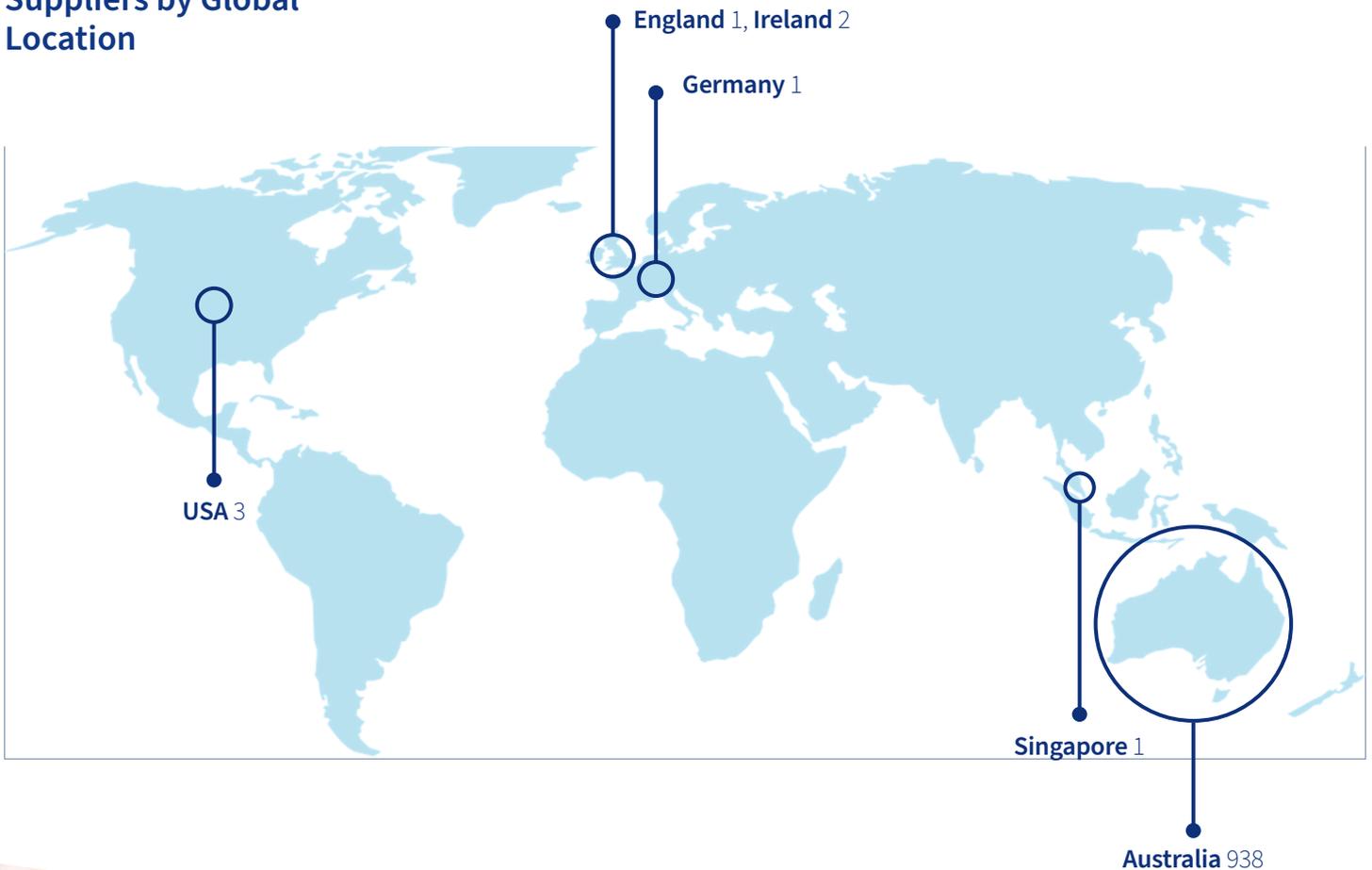
- Organisation-wide audit and review cycles
- Regularly sourcing and review of stakeholder feedback
- Monitoring Industry and Government policy and legislation
- Senior management oversight of risk management processes

The MEGT Risk Management Team meets monthly and is responsible for identification and management of risks and monitoring adherence to risk management policies and procedures. We operate divisional risk management profiles which are reviewed and updated quarterly, with results aggregated and tabled for the Risk and Strategy Committee and Board consideration. Progress against approved risk management plans is reviewed regularly to monitor the effectiveness of risk management across the organisation.

5. Operations and supply chain

In 2023, MEGT procured goods and services from 946 creditor supply entities, 938 of which are Australian-based and eight which are based overseas. All overseas suppliers are technology companies providing software-related services.

Suppliers by Global Location



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

Corporate and operational procurements

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

Capital spends

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

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

Supply Category	% of Total Spend
Office expenses	22.68%
Consultancy	15.82%
Motor Vehicle expenses	9.61%
Superannuation	8.94%
Office Rental	8.40%
Training and Conferences	5.53%
Computer expenses	4.84%
Telecommunications	4.52%
TAFE fees	3.96%
Equipment and Building Maintenance	3.31%
Advertising and Promotions	3.24%
Membership Fees	2.17%
Workcare Medical expenses	2.13%
Travel and Accommodation	1.67%
Other	0.94%
Protective Clothing	0.72%
Electricity	0.47%
Legal costs	0.38%
Printing & Photocopying	0.36%
Office Cleaning	0.32%
	100%

6. Identifying modern slavery risks

During 2023, MEGT carried out a high-level risk assessment of key suppliers engaged throughout the organisation using the guidance from the Department of Home Affairs and the underlying principles as set out by United Nations Human Rights Office of the High Commission and OECD.

6.1 Operations

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

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

The principles under which we operate are:

1. Working under specific industry awards and enterprise agreements which meet the National Employment Standards set out by Fair Work Australia.
2. The Australian Human Rights principles of dignity, equality and mutual respect which are embedded in our:
 - Code of Conduct
 - Equal Opportunity and Diversity Policy
 - Anti-Bullying Policy and Procedure
 - Recruitment and Selection Policy and Procedure
 - Unacceptable Workplace Behavior Guidelines
3. We protect the working conditions of our staff through the Work Health and Safety Policy.
4. We place a significant focus on diversity through our:
 - Equal Opportunity and Diversity policy
 - Reconciliation Action Plan
 - Indigenous Australians policy
5. MEGT is compliant with gender reporting under the Workplace Gender Equality Act.
6. MEGT is an active member of the Australian Network on Disability.

In addition, as part of the Remuneration and Governance Charter, MEGT regularly conducts external reviews of employee awards, enterprise agreements and employment contracts to ensure we are meeting our obligations.



6.2 Supply chain

MEGT is a service-based organisation. We do not source any raw materials or component parts to manufacture products, nor do we hold inventory for resale. The 'indirect' goods and services we procure help us to run and sustain our business operations.

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

Geographic risk

The vast majority of our suppliers are located in Australia. In our view, these suppliers have a lower risk of modern slavery occurring in their own operations as they are governed by Australian laws and regulations and operate within a society and a commercial environment where modern slavery practices are strongly condemned.

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

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

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

Product, services and industry risk

On the basis that our organisational relationships include hundreds of entities in our supply chain (including entities we do not have a direct contractual relationship with), there are risks that MEGT's engagements are connected to modern slavery through the activities of our suppliers' own supply chains.

For example, at many MEGT premises we engage contractors to provide facility services such as cleaning and maintenance. It is a widespread business practice for primary contractors in these low-skilled industries to outsource subcontracting arrangements and/or engage labour hire. This becomes increasingly difficult for MEGT to control when there is no clear line-of-sight over who is providing the end service.

Using the Global Slavery index vulnerability model, MEGT has also identified that various suppliers source products from high-risk countries which are more likely to contribute to modern slavery practices.

Examples of these in our organisation are:

- Construction and building materials used in office fit outs
- Technology including hardware and software
- Catering and food-related products such as tea or coffee
- Textile-related goods such as protective workwear and corporate uniforms
- Motor vehicles and component parts



7. Actions taken to address identified risks

MEGT is committed to acting ethically and with integrity in all business relationships. This involves taking reasonable steps to ensure that modern slavery does not exist in either our business or supply chain. When we engage with suppliers, they are expected to share our commitment to act lawfully and ethically to ensure full compliance with modern slavery obligations.

Our focus in this reporting period has again been to reinforce knowledge of our modern slavery obligations throughout the business, continue to raise awareness of the issues and risks, and to further identify potential high-risk suppliers.

7.1 Appointing and developing staff in key roles

Compliance

In 2023, MEGT created and embedded the new role of Senior Compliance Manager to establish a business-wide framework for the unification and maintenance of company policies and procedures. The remit of this roles includes:

- Privacy
- Risk
- Audit
- Accreditations and certifications

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

Procurement

Created in the previous reporting period, the role of Procurement and Contracts Manager now guides and assists staff and departments through the process of planning purchases, conducting 'go-to market' events, entering supply agreements with service providers, and managing them. In support of this, an MEGT Procurement intranet site was developed in 2023 as a key resource for staff delegated to engage the supply chain.

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

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

- The Act
- The Modern Slavery Register web page
- MEGT's current and past Modern Slavery Statements

People and Culture

MEGT has engaged two full time Learning and Development staff members, whose roles include educating members of the cohort which is authorised to source goods and services from external suppliers about their roles and responsibilities under the Modern Slavery Statement. MEGT also has an induction process in place for all new staff to educate about these matters, including learning modules.

7.2 Building our understanding and capability

MEGT has measures in place to ensure we have a well-educated and capable team making decisions about the engagement of, and relationships with, our supply chain. Education extends to the general workforce to increase awareness and cast a wider net across the organisation to identify instances where modern slavery may exist.

To build the required knowledge and to maintain a consistent level of awareness within our team, MEGT utilises an interactive modern slavery training course, 'Combating Modern Slavery', on our digital learning management platform. This module emphasises that modern slavery is a serious crime where individuals are subject to exploitative work practices that are a violation of human rights. It has three learning objectives:

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

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

- Defines and raises awareness of the complex issues associated with modern slavery
- Identifies the types of modern slavery that exist in society
- Identifies and discusses the geographical and industry-specific impacts of modern slavery
- Identifies risk factors across sectors and assists staff to address the risk
- Trains staff to identify signs of people suffering from modern slavery
- Outlines the consequences of modern slavery for an organisation
- Provides an overview of the Modern Slavery Act 2018 and reporting requirements

7.3 Improving policy and procedures

In this statement, MEGT has highlighted policies and procedures to ensure we address our corporate, social, and legal responsibilities. These documents are regularly updated to incorporate evolving issues such as modern slavery. Through our training, code of conduct, equal opportunity, and diversity policies, we demonstrate a strong commitment to emerging issues and continually set a high standard of values which our staff are expected to exhibit.



7.4 Engagement with suppliers

Our primary resources for addressing the risks associated with modern slavery in the supply chain are the skills and experience of our people, along with the internal controls we have in place. The following points outline MEGT's efforts as they relate to engagement with our suppliers:

- Our Procurement Framework provides visibility over suppliers and the contract lifecycle. This requires suppliers to demonstrate sound commercial hygiene practices and to support the governance responsibilities MEGT is obliged to meet as a Federal Government contractor, including full adherence to the requirements of the Modern Slavery Act
- When a new supplier is established as a creditor within MEGT's finance system, a New Creditor Information Sheet is completed. This captures the details required to conduct business and certain other attributes including whether the supplier is modern slavery compliant
- As part of our broader Contractor Induction Process, MEGT has in place a supplier questionnaire, entitled 'Identifying Modern Slavery Risks', which is used when engaging with both low and high-risk suppliers. This improves confidence that suppliers are assessing their own supply chains for the potential of exposure to modern slavery
- MEGT restricts the number of executives and senior managers who have the delegated authority to commit the organisation to new supply arrangements. These individuals are skilled commercial negotiators with the ability to diligently identify risks including the potential for modern slavery
- Having been in operation since 1982, the longevity of our business enables close and transparent supplier relationships, allowing diligent identification of unlawful behaviours
- MEGT does not deal in cash. Our dealing with all suppliers is transparent and we only pay by means of electronic transfer upon receipt of a proper tax invoice. This substantially reduces the risk of unlawful commercial conduct, especially as some companies receive and pay employees in cash, creating the potential for exploitation

7.5 Remediation process

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

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

- All reported instances of modern slavery to be escalated to the executive team and reported to the Chair of the Board
- Provide the support necessary for a rapid, coordinated response if victims of modern slavery are identified in our operations or supply chain
- Provide a confidential grievance mechanism to report suspected incidents of modern slavery
- Provide practical and timely support for any person impacted by modern slavery in our operations
- Develop a corrective action plan on a case-by-case basis
- Immediately terminate any contract or supply arrangement where the supplier is deemed to have acted in breach of their obligations under the Modern Slavery Act

Addressing modern slavery risks with the ultimate goal of its global eradication begins with the individual. Beyond the organisational measures taken to address key identified modern slavery risks, MEGT also expects employees to familiarise themselves with, and adhere to, relevant laws and governing policies, to actively mitigate risk in their areas of control, and ensure that any instances are reported for the immediate attention of the organisation.

7.6 Assessing the effectiveness of actions being taken

Continual reviews and assessments of the effectiveness of our policies, codes, standards, and procedures relating to modern slavery forms part of the ongoing agenda for the MEGT Risk Management team. The committee will continue to report and provide recommendations for action and change to the executive team for consideration and approval to be implemented.

8. Looking ahead

MEGT has a zero-tolerance approach to modern slavery and remains committed to tackling the issue in its operations and supply chain. We are further committed as a business, from the Board of Directors, executive team and all other employees, to implementing the actions and processes necessary for the continuous improvement of what is required to deal with modern slavery risks in our operations and supply chain.

Our plan is to take the following actions in future reporting periods to reduce the risk posed by modern slavery internally in our business operations and in our external supply chain:

- Continue to capture any reported incidents of modern slavery within our business operations and within our supply chain, undertake investigation and reporting, and remediate or mitigate any recurrent risks
- Continue to undertake modern slavery awareness training to support those in leadership, management, procurement and risk management roles who are involved in identifying, assessing, and addressing modern slavery risks
- Continue to limit delegations of authority for supplier engagement and contracting to a small number of executives and senior managers as a control measure to limit the risk of modern slavery in our supply chain
- Participate in external professional forums to receive modern slavery information updates related to how the Modern Slavery Act is administered and applied
- Further develop our new procurement framework, governance documents and standards to ensure suppliers and third-party providers address modern slavery risks in their business operations and supply chains
- Establish a broader Modern Slavery Commitment Statement with the purpose of encapsulation MEGT's position towards the risk of modern slavery within our business operations and supply chains
- Add modern slavery compliance to the scoring criteria in the General Manager's annual assessment of approved MEGT contractors

9. Consultation

This statement was prepared by a working group which is leading MEGT's modern slavery compliance initiatives. The group collaborated with each business unit to develop the document which has been reviewed and endorsed by our executive team prior to submitting for adoption by the Board of MEGT. The MEGT Modern Slavery Statement (2023) has since been approved by the Board of Directors of MEGT (Australia) Ltd.

Signed by the Chair of MEGT (Australia) Ltd



William Barry O'Gorman

megt.com.au

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

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MEGT