

## Modern Slavery Statement (Joint)

Torrens University Australia Limited and Torrens Global Education Services Pty Ltd

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### REPORTING ENTITIES

The Commonwealth *Modern Slavery Act 2018* (the “Act”) entered into force on 1 January 2019. The Act established a national Modern Slavery Reporting Requirement (“Reporting Requirement”) to large businesses and other entities in the Australian market with an annual consolidated revenue of at least AUD\$100 million, the definition of which applies to the following of our corporate entities:

- Torrens University Australia Limited (“TUA”); and
- Torrens Global Education Services Pty Ltd (“TGES”)

TUA and TGES understand that the Reporting Requirement supports the Australian business community to identify and address their modern slavery risks, and to maintain responsible and transparent supply chains.

The following Statement sets out TUA and TGES’s actions to assess and address modern slavery risks in our operations and supply chains.

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### STRUCTURE, AND OPERATIONS AND OVERVIEW

TUA was established as a private university under the *Torrens University Australia Act 2013* (SA) and is registered as an Australian University under the *Tertiary Education Quality and Standards Agency Act 2011* (Cth). TUA is also registered with the Australian Securities and Investments Commission as an Australian public company limited by shares.

Structure: TUA and TGES are wholly-owned subsidiaries of Strategic Education, Inc., (SEI) a foreign publicly listed US company listed on the NASDAQ stock exchange under the symbol STRA.

In addition to TUA and TGES, SEI is also the ultimate parent company of the following Australian entities:

Think: Colleges Pty Ltd (Think), SEI Australia Holdings Pty Ltd, SEI Australia Education Pty Ltd SEI Higher Education Holdings Pty Ltd, Think: Education Group Pty Ltd, Think: Education Services Pty Ltd, Torrens Global Education Holdings Pty Ltd (jointly and severally hereinafter referred to as “SEI Australia”)

Operations: TGES is a private company and operates as a shared services entity that supports the operations of TUA,

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among other institutions. Both TUA and TGES adopt the same policies and processes, operate in the same sector and have many shared suppliers, therefore this Statement provides a single consolidated description of both entities.

Both TUA and TGES do not own or control any other entities in Australia.

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**MODERN SLAVERY  
RISKS**

TUA and TGES consider the term 'modern slavery' to describe any situation where coercion, threats or deception is used to exploit a person and undermine or deprive them of their freedom. Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

As the majority of TUA and TGES's total procurement spend is within Australia, TUA and TGES do not deal directly with vendors located outside Australia with the exception of a few small vendors. These vendors include international student recruitment agents, suppliers of advertising and marketing services and products, printing suppliers and independent contractors for HR admin related services. The main countries in which these vendors operate are in Malaysia, Philippines, Vietnam, Korea, Thailand, Taiwan, Nepal, India, Singapore, Hong Kong and China. Whilst TUA and TGES consider any modern slavery risks to be low, they recognise that any areas of vulnerability in the modern supply chain can occur at any time. Such risks include unlawful withholding of wages, withholding of identity documents, excessive work hours and restriction of movement and deducting excessive fees for remuneration. To minimise the prevalence of these risks in our supply chain, TUA and TGES undertake specific Due Diligence and Training and Awareness as specified below.

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**POLICY**

SEI and SEI Australia are committed to doing the right thing. That is why our organisation identifies and disseminates to all employees appropriate legal and ethical standards in the conduct of our business. The SEI Code of Business Conduct ("Code") is specifically designed to be part of an effective program to prevent and detect accounting improprieties, legal violations, and unethical and inappropriate behaviour. All directors, trustees, officers, and employees of SEI and SEI Australia are expected to comply with this Code.

This Code applies to all persons working for and with SEI and SEI Australia or on their behalf in any capacity, including

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employees, directors, officers, volunteers, interns, external consultants, third-party representatives and business partners, including contractors and suppliers. Hence, all TUA and TGES employees should act in the best interests of SEI Australia when conducting business on behalf of SEI Australia.

This statement also applies to TUA and TGES teaching, learning, and support activities. For the purpose of this statement, the term "staff" refers to all employees, consultants and contractors.

TUA and TGES have a zero-tolerance approach to modern slavery and are committed to acting ethically and with integrity in all of their business dealings and relationships. TUA and TGES are also implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in their business operations or in any of their supply chains.

TUA and TGES are committed to ensuring there is transparency in their business and in their approach to tackling modern slavery throughout their supply chains, consistent with their disclosure obligations under the Act.

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**DUE DILIGENCE**

Principles for the sound and fair management of TUA and TGES and their staff are regularly reviewed by their governing bodies, and those principles are observed at all times in the administration of their businesses.

TUA and TGES are updating their vendor due diligence questions as part of their vendor registration form to ensure that all suppliers acknowledge the Act and have measures in place to combat modern slavery, at a minimum. TUA and TGES also have a robust vendor due diligence system for their international student recruitment agents and other key suppliers to ensure that such suppliers are not in breach of the Act.

TUA and TGES work with key international resources and are implementing, where applicable, guidance to support decent work in supply chains, including utilising:

- the Business and Human Rights Resource Centre website
  - the Ethical Trading Initiative and Fair Labour Association websites
  - the Global Business Initiative on Human Rights website
  - the Institute for Human Rights and Business website
  - the International Labour Organization website
  - the International Organization for Migration website
  - the United Nations Global Compact 'Decent Work Toolkit for Sustainable Procurement'
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- The global B Corp certification Impact Assessment

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**ACTION &  
COMPLIANCE**

The prevention, detection and reporting of modern slavery in any part of TUA and TGES's business or supply chain is the responsibility of all those working for TUA and TGES or under TUA's and TGES's control.

TUA and TGES expect a similar high standard from all of their contractors, suppliers and other business partners. As part of their due diligence and remediation processes, TUA and TGES monitor a large number of their offshore vendors to ensure that any use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, are held to account. This may include an official warning that should such purported conduct be substantiated, the engagements with those entities will be terminated.

TUA and TGES staff and students are required to avoid any activity that might lead to, or suggest, a breach of human rights. Staff and students are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of TUA or TGES's business or supply chains of any supplier tier at the earliest possible stage in accordance with TUA and TGES's Whistleblower Policy or via TUA and TGES's Ethics Hotline as soon as possible.

TUA and TGES aim to encourage openness and will support anyone who raises genuine concerns in good faith, even if they turn out to be mistaken. TUA and TGES are committed to ensuring that no one suffers any detrimental treatment as a result of reporting, in good faith, their suspicion that modern slavery of whatever form is or may be taking place in any part of TUA and TGES's business or in any of their supply chains.

TUA and TGES considers that its strict approach when identifying matters that fall within the prohibitions of the Modern Slavery Act, and the potential repercussions for such suppliers, are effective in addressing such issues in its supply chain.

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**TRAINING AND  
AWARENESS**

TUA and TGES believe in training and engagement at every level. Universities are increasingly considering the impact on the world – its people and the environment, of research activities, and of their own business practices and transactions.

TUA and TGES will seek to promote the Act internationally as one leading example of a legislative model, and seek corresponding responses to address modern slavery as a global issue.

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TUA and TGES will work with their affiliate institutions to build awareness of modern slavery and address risks in various geographic locations. As such, TUA and TGES's active engagement in anti-slavery methods is imperative and universally beneficial.

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**MONITORING**

Universities are able to combine their academic expertise on human rights and business, with their professional procurement practices, in order to take a lead on combating modern slavery.

TUA and TGES plan to increase their commitments to social responsibility and sustainability including areas such as fair trade and sustainable procurement, equality and diversity, and social sustainability. Universities are also leading social research and development, and considering innovative methods to combat social injustices and imbalances.

TUA is a Certified B Corporation, meaning as a for-profit business, it meets the highest standards of verified social and environmental performance, public transparency, and legal accountability to balance profit and purpose.

In addition, as a Certified B Corporation (B Corp), TUA is part of a community of over 3500 private companies globally that are using their business as a force for good. To become a B Corp, TUA is required to undergo a rigorous impact assessment every three years administered by B Lab, an independent third-party based in the United States. This assessment measures a company's impact on five different areas: customers, staff, governance, community engagement, and the environment. Results from the assessment are benchmarked both internally and externally, shared publicly, and are used to understand impact and improve.

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This statement relates to the actions and activities of Torrens University Australia Limited and Torrens Global Education Services Pty Ltd during the financial year ending 31 December 2021 and was approved by the respective board of directors for Torrens University Australia Limited and Torrens Global Education Services Pty Ltd on 30 June 2022.

**Executed for and on behalf of Torrens University Australia Limited by:**

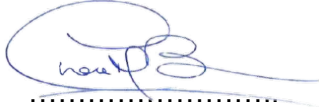


Linda Brown  
Director

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PART OF TORRENS GLOBAL EDUCATION SERVICES

**Executed** for and on behalf of **Torrens Global Education Services Pty Ltd** by:



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Linda Brown  
Director