

Modern Slavery Statement

MTC Australia

Reporting Period: 1 January 2024 to 31 December 2024

1. Introduction

MTC Australia is committed to upholding the highest standards of ethical conduct and human rights throughout our operations and supply chains. This Modern Slavery Statement outlines the steps taken during the reporting period to identify, assess, and address modern slavery risks in our business and supply chains. Modern slavery – including forced labour, human trafficking, and child labour – remains a global human rights challenge. While Australia is a low-prevalence country, we recognise that risks can exist in supply chains and operations both domestically and overseas. This statement has been prepared in accordance with Section 16(1) of the Commonwealth Modern Slavery Act 2018 (Cth) and details our governance framework, supplier engagement processes, staff training initiatives, and remediation steps.

2. Reporting Entity

This Modern Slavery Statement is made by Management & Training Corporation Pty Ltd (MTC Australia) (ABN 25 602 791 364, ACN 602 791 364). We are incorporated in Australia and headquartered at Level 3, 6 Yoga Way, Springfield Central, Queensland. MTC Australia is a wholly owned subsidiary of Management & Training Corporation (MTC), a global provider of correctional, educational, and rehabilitation services operating in the United States, United Kingdom, New Zealand, and Australia.

3. Structure, Operations and Supply Chains

MTC Australia delivers a range of services in correctional and immigration detention contexts, including:

- Management of Parklea Correctional Centre in New South Wales and the Nauru Regional Processing Centre.
- Throughcare reintegration program for post-release community support.
- Immigration detention services through subsidiary Secure Journeys.

Our supply chains involve procurement of goods and services including correctional supplies (uniforms, bedding, stationery, catering), services (cleaning, security, maintenance, logistics), program delivery materials, IT hardware and systems, and accredited health services. Procurement is primarily from Australian suppliers, with no known direct overseas suppliers. We recognise upstream supply chains for goods like textiles and electronics may extend into higher-risk jurisdictions.

4. Risks of Modern Slavery in Our Operations and Supply Chains

Operational Risks:

- Vulnerability of contracted services (e.g., cleaning, security) relying on low-skilled or temporary workers.
- Engagement with vulnerable populations in correctional and detention environments requiring safeguards against coercion.

Supply Chain Risks:

- Textiles and manufactured goods potentially sourced from high-risk labour regions.
- Electronics and IT equipment components sourced from jurisdictions with labour rights concerns.
- Service contractors using sub-contracting arrangements with limited transparency.

5. Actions to Assess and Address Modern Slavery Risks

Policies and Procedures:

- Supplier Code of Conduct prohibiting forced and child labour, requiring compliance with workplace laws.
- Contractual clauses enabling termination for breaches of the Modern Slavery Act.
- Ethical procurement standards embedded in sourcing practices.

Training:

- Modern slavery awareness training for procurement, contract management, and operational leaders.

Risk Assessment & Due Diligence:

- Pre-qualification questionnaires assessing supplier practices.
- Enhanced due diligence for higher-risk categories.

Remediation:

- Supplier engagement to address risks, implementation of corrective action plans, termination and authority notification where needed.

Continuous Improvement:

- Expanding training coverage.
- Increasing supplier audits.
- Updating Supplier Code of Conduct with stronger recruitment safeguards.

6. Assessing the Effectiveness of Our Actions

- Supplier screening rate: Target 100% completion before onboarding.
- Training completion: Target 95% annual completion for relevant staff.
- Incident reporting and resolution tracking.
- Annual supplier risk profile review and action plan updates.

7. Consultation

Prepared in consultation with MTC global leadership and Australian operational teams. Input from Corporate Services, Procurement, Human Resources, and Operational Management through workshops and document review. Reviewed and approved by the MTC Australia Board.

8. Future Commitments

- Conduct targeted audits of higher-risk supply chain categories.
- Expand modern slavery training to all staff.
- Strengthen responsible recruitment clauses.
- Increase engagement with industry networks and government initiatives.

9. Finalisation

This statement was approved by :
Troy Ittensohn
Director, Management & Training Corporation Pty. Ltd.
Signed: Signed:
Date: 22-08-2025