



2024 MODERN SLAVERY STATEMENT

NextEd Group Limited

ABN 75 105 012 066

Table of Contents

1. Our commitment	3
2. What is modern slavery?.....	3
3. The “Reporting Entity”	4
4. Our structure, operations and supply chain.....	4
5. Identifying our Modern Slavery Risks.....	12
6. Actions: how we address modern slavery	13
7. Assessing effectiveness & consultation	15
8. Approval	16
Appendix – NextEd entities.....	17

1. Our commitment

This Modern Slavery Statement outlines NextEd Group Limited's activities to support its commitment to zero tolerance of modern slavery and human trafficking.

NextEd is committed to acting ethically and with integrity in all aspects of its operations, business dealings and supplier relationships. We seek to implement and maintain effective systems and controls to ensure that modern slavery and human trafficking are not occurring anywhere within our own businesses or in our supply chains.

NextEd is committed to ensuring there is transparency in our approach to addressing modern slavery throughout our business and supply chains, in a manner consistent with our disclosure obligations under the Modern Slavery Act 2018 (*Cth*) (the **Modern Slavery Act**).

NextEd understands that prevention, detection and reporting of any modern slavery or human trafficking activities in any part of the organisation is the responsibility of its people. Employees and contractors are encouraged to report any concerns about possible breaches within the organisation or our supply chain to the Group Quality, Accreditation & Compliance Manager (email pivacyofficer@nexted.com.au or to a member of the NextEd Senior Executive Team.

2. What is modern slavery?

Modern slavery describes situations where offenders use coercion, threats, or deception to exploit victims and undermine their freedom.¹

Modern slavery is a criminal offence² and is defined in the Modern Slavery Act as including:

- trafficking of persons;
- slavery;
- servitude;
- forced marriage;
- forced labour;
- debt bondage;
- deceptive recruiting for labour or services; or
- child labour in situations where children are subjected to slavery or similar practices or are engaged in hazardous work. This includes but is not limited to

¹ Attorney General's Dept www.ag.gov.au/crime/modernslavery.

² Divisions 270 and 271 of the Commonwealth Criminal Code.

orphanage trafficking and slavery in residential care institutions, sexual exploitation, as well as child labour practices in factories, mining and agriculture.

3. The “Reporting Entity”

NextEd Group Limited (the **Reporting Entity**), is an ASX listed company (ASX:NXD). This 2024 Modern Slavery Statement covers NextEd Group Limited and its controlled entities, as described in section 4.1 below and listed in the Appendix for the reporting period 1 July 2023 to 30 June 2024 (**Reporting Period** or **FY24**). Throughout this statement, we refer to the Reporting Entity and its controlled entities collectively as **NextEd**.

In the Reporting Period, NextEd had an annual turnover of \$111.4 million, just in excess of the minimum statutory reporting threshold under the Modern Slavery Act for the first time.

This is NextEd’s second Modern Slavery Statement. While NextEd has comprehensive and robust governance and compliance frameworks in place, it is still in the early stages of formalising programmes for identifying, assessing and addressing potential modern slavery risks.

NextEd is committed to a culture of continuous improvement and, as we expand and enhance our frameworks, policies, procedures and actions, directed towards the detection and mitigation of modern slavery and human trafficking risks in our operations and supply chain, that progress will be reported in future Modern Slavery Statements.

4. Our structure, operations and supply chain

4.1. Our structure

NextEd includes the entities listed in the Appendix.

The NextEd businesses presently operate in 4 main divisions:

- Technology & Design;
- Domestic Vocational;
- International Vocational (including English language); and
- Go Study Australia.

4.2. Our operations

NextEd is one of Australia’s largest listed private education organisations, delivering education and services to more than 15,000 students annually at its 9 campuses around Australia, online, and at its 10 student recruitment offices. The organisation

delivers quality courses across the English Language, Vocational and Higher Education sectors, to both domestic and international student, as described in more detail below.

Our Businesses

Technology & Design



Founded in 1999, Academy of Interactive Technology (**AIT**) has trained over 5,000 students to be leaders of the future in the digital and creative industries. AITs programs and philosophy transform creative minds into the industry's most sought-after graduates.

AIT specialises in delivering Higher Education qualifications with specialisations including Mobile App Development, 2D Animation, 3D Design, Game Design, and Film. In addition to be an approved Institute of Higher Education, AIT is an approved Registered Training Organisation (RTO) delivering Vocational qualifications in Interior Design, IT and Graphic Design.

AITs students having access to some of the country's best technologies, creative sector educators and industry practitioners. AITs long-standing relationships with industry experts, associations and companies gives its graduates a competitive edge.



Launched as a brand of AIT in 2015, Coder Academy Australia (**CA**) delivers accelerated-learning vocational and higher education accredited Bootcamps to help people transform careers at pace. CA is the original Australian-owned coding Bootcamp, offering a range of courses in tech sector skills development which are designed to be intensive and immersive; delivering accredited qualifications that traditionally take up to 2 years or more into shorter periods of 6 or 10 months without compromising learning outcomes.

What makes CA unique is the bringing together of industry experience and expertise in education, with industry leaders designing courses to directly fill skills gaps. Our internship program is well-respected throughout the tech sector, with graduates going on to work for companies such as Dropbox, Commonwealth Bank, Gorilla Stack, Code Nation and Lexicon Digital, to name a few.



The International School of Colour and Design (**iscd**) offers industry driven vocational interior decoration and design that incorporate the fundamentals of design. Courses are delivered online.

The strength of iscd's reputation and its long history in this sector has resulted in many graduates going on to become some of Australia's most respected interior designers.

Domestic Vocational



Celtic Training & Consultancy (**Celtic**) has built its reputation on 16 years of empowering students to discover their pathways. Celtic provides nationally recognised vocational qualifications through virtual and in-person training across Queensland and South Australia. It currently specialises in healthcare and community services qualifications.

Since its founding in 2005, Celtic has created a community of students, trainers, and employers. As a result, students who study with Celtic are given the best work connections, expert resume support and a network of friendly, like-minded workers who want to see them succeed.



Brisbane Career College trading as SERO Institute (**Sero**) is an Australian registered vocational education and training provider for domestic students. Sero delivers vocational qualifications in cookery, hospitality, community services, sport and fitness. Under the slogan 'create your tomorrow today', Sero is passionate about providing industry-ready skills for today's fast-paced world.

Since launching in 2014, Sero has been dedicated to creating world-class study experiences for every student by using the latest industry equipment, specialist trainers, and quality campus resources.

International Vocational



Greenwich College (**Greenwich**) is one of the largest and most respected private tertiary education colleges delivering courses to international students in Australia.

Greenwich operates campuses in Sydney, Melbourne, Brisbane, Adelaide, Gold Coast and Perth. It delivers courses to more than 10,000 English language students each year, and to more than 6,000 vocational students undertaking courses in business, marketing, leadership & management, project management, cookery & hospitality, and healthcare. Greenwich operates under the following brand names: Greenwich College, Greenwich English College, Greenwich Management College, Greenwich Hospitality College and Greenwich Health & Care College.

Greenwich College is recognised as an innovative leader within the international tertiary education industry and has been presented with a series of awards to recognise the excellent quality of the services and products it offers to its international students.

Student Recruitment



Go Study Australia (**Go Study**) is one of Australia's largest student recruitment agencies, providing education advice, enrolment support, visa administration and lifestyle support for students looking to live, work and study in Australia.

Go Study has recruitment and marketing agreements with more than 300 universities and colleges located across Australia, Canada, Latin America, and the UK supporting the enrolment of more than 5,000 international students each year.

Go Study has 16 offices located in Europe (France, Italy and Spain), Latin America (Chile, Columbia and Mexico) and around Australia.

Our NextEd Vision

We share a vision to unleash potential through inspiring learning and experiences, ensuring graduates are equipped with the skills to fulfil their personal and career ambitions.

Unleashing potential



We are helping people succeed through education. We are breaking down barriers and we operate with high energy and high engagement. We promote strength within our students and across the organisation. Most of all, we empower our students to achieve personal growth.

Inspiring



We aim to be uplifting, visionary and creative in order to make engaging and relevant courses that promote out of the box thinking and building connections.

Learning and experiences



Education is more than just what happens in the classroom. The entire experience of learning, community and industry mentorship should be our focus to ensure our students achieve positive outcomes.

Our NextEd Values



Be Bold

Courageous and forward-thinking people who are inspired to deliver and support impactful innovation and growth strategies.



Be Inclusive

Diverse and engaged teams who are agile, connected and aligned to putting collective success before individual achievements.



Be Respectful

Honest and considerate people who show gratitude for the efforts of others and take responsibility for their actions.



Be Excellent

Passionate and results driven people who are renowned for delivering great student experiences and outcomes.

4.3. Our supply chain

Our supply chain comprises:

- Education agents – providers of advice and support to international students about choices of study destinations, colleges, courses, and visa requirements. Agents help students with visa and enrolment documentation as part of the process of recruiting them into courses and receive a percentage of the tuition that the student pays to a college for the services they perform. In addition to its own agency Go Study, NextEd works with approximately 800 education agencies from over 80 different source countries.
- Professional service providers – includes audit, accountancy, legal services, insurance, consultancy, and regulatory compliance experts.
- Labour hire and recruitment companies – providers of casual staff and permanent staff recruitment services across all organisational functions.
- IT suppliers - supply IT hardware and software solutions to the organisation, which in some cases includes external data hosting and storage services.
- Construction workers and project managers – are engaged by NextEd to work on campus and office fit-out projects and maintaining and upgrading of premises, all in Australia.
- Property leasing, licensing, and hire – NextEd does not own the properties it operates from, and instead leases or licenses premises from third party landlords. In addition, NextEd will occasionally hold social or working events at external premises.
- Cleaning and maintenance companies – provide cleaning services to NextEd offices and campuses.
- Stationery and printing suppliers – provide office stationery, learning resources, marketing collateral and other general office equipment.
- Course textbooks and learning kit suppliers – provide online textbooks and custom learning kits for NextEd students to use when undertaking their courses.
- Cookery and Hospitality kits, design kits, and IT software packages are sourced from domestic and international suppliers.
- Clothing and merchandise suppliers – provide NextEd with branded products and clothing.
- Travel and accommodation providers – Some NextEd employees undertake work-related travel to perform their roles. The organisation works with travel booking companies, airlines and hotel accommodation groups both domestically and overseas.

5. Identifying our Modern Slavery Risks

5.1. Risks in our operations

NextEd employs over 600 full-time, part-time, sessional, and casual employees across its operations in Australia and overseas. We understand that the education industry is not considered to be a high-risk industry for modern slavery due to the high levels of regulatory oversight and the fact that many of our employees are skilled and hold tertiary qualifications relevant to their roles. We believe that this, combined with NextEd's employment and corporate governance policies and practices, reduce the risk of modern slavery within our employed workforce.

We recognise that the risk of modern slavery varies by geography, and are influenced by local laws, customs and practices. NextEd operates in 7 countries, 2 of which (Colombia & Mexico) are considered to have a higher risk of modern slavery, as measured by the Global Slavery Index 2022. We therefore are alert that there may be a higher risk that our staff and contractors in those countries may be exposed to modern slavery practices.

5.2. Risk in our supply chain

Education agents

NextEd considers that the education agent relationships present the greatest risk of possible modern slavery in its supply chain. This aligns with the findings of the Nixon Rapid Review commissioned by the Home Affairs Minister in 2023. Many of the agents who refer students to NextEd residing in Southeast Asia, South Asia, Latin America and Europe. Countries in some of these regions are considered to present a higher risk of modern slavery.

Whilst some Australian legislation in particular Standard 4 of the National Code 2018, Education Services for Overseas Students 2000, the London Statement 2012, and Australian Consumer Laws provide a framework for education agent operations, there is a likelihood that some agents may knowingly or unwittingly provide incomplete or inaccurate information to international students during the recruitment process, or have payment practices for their employees (especially those located overseas) which may be considered as modern slavery.

Goods and services

NextEd purchases a variety of goods and services to operate its businesses as outlined above and recognises that there is potential for NextEd to contribute to or be directly linked to modern slavery practices through the procurement of goods and services used in our operations.

Higher risk areas are likely to be where goods are sourced from overseas manufacturing facilities, or where services are delivered by overseas located employees.

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

- Purchase of electronic equipment which is manufactured overseas;
- Purchase of branded promotional goods and clothing which is manufactured overseas; and
- Sourcing of furniture for fit out of new campuses from overseas manufacturers.

NextEd intends to continue the prioritisation of assessment of these possible higher risk areas, and mitigation where appropriate.

5.3. Reporting mechanisms

NextEd understands that prevention, detection and reporting of any modern slavery and human trafficking in any part of the organisation is the responsibility of its people. Employees and contractors are encouraged to report any concerns about likely breaches within the organisation or its supply chain to the Group Quality, Accreditation & Compliance Manager (email eve.ollerenshaw@nexted.com.au or telephone +61 424 141 279), the Group Privacy Officer (email privacyofficer@nexted.com.au, or to a member of the NextEd Senior Executive Team.

6.Actions: how we address modern slavery

6.1. Our approach

NextEd acknowledges that addressing modern slavery requires a whole of organisation response that addresses each of the following areas:

- Our organisation's operations and culture;
- Collaboration with suppliers and other stakeholders;
- Systems and processes;
- People and management;
- Governance and oversight; and
- Reporting, review and remediation as required.

As this is NextEd's second Modern Slavery Statement, we are still in relatively early stages of formalising programmes for identifying, assessing and addressing modern slavery risks across the organisation and our supply chain.

6.2. NextEd's embedded governance and compliance frameworks

NextEd has in place robust governance and compliance frameworks, policies and procedures including (among other things):

1. Whistleblower Policy;
2. Annual Corporate Governance Statement;
3. Discrimination, Bullying and Harassment Policy;
4. Fraud and Corruption Policy;
5. Diversity Policy;
6. Risk Tolerance Statement;
7. Privacy Policy;
8. Modern Slavery Policy; and
9. Code of Conduct.

NextEd also has a comprehensive Agent Management Framework to provide guidance to its staff and agents in relation to compliance and best practice. NextEd has updated its Agents Agreement to include direct reference to compliance with Australia's requirements on Modern Slavery.

6.3. Awareness raising and training

After the end of the current reporting period and prior to approval of this 2024 Modern Slavery Statement, a second tranche of senior staff reporting directly to the Senior Leadership Team have completed training about modern slavery, our legislative obligations and best practice. This training was in the form of a comprehensive online module with detailed content, Q&A and a mandatory test. This is in the process of being extended to other key functional and operational staff.

6.4. Our outlook

NextEd's focus during the balance of the next reporting period (FY25) will be on creating and embedding an appropriate Modern Slavery governance framework and supporting procedures across the organisation.

Since the end of the current Reporting Period, NextEd has established a Modern Slavery Steering Committee comprising:

- CEO;
- CFO;
- Exec GM Quality, Accreditation & Compliance;

- Group Privacy Officer, and
- Company Secretary

The Committee will report to the Audit & Risk Management Committee of the Board of Directors of NextEd at least twice annually. The Committee will be supported by a working group including appropriate representatives from support function and business units as appropriate from time to time.

Other future actions intended to be undertaken include:

- Completing the develop and implementation of policies and processes to support the identification, management, and remediation of modern slavery risks;
- Continuing to roll out modern slavery training to employees;
- Undertake a risk review and analysis of areas considered to be possible higher risk areas in our supply chain, including education agents who operate in higher risk countries and suppliers of goods sourced from higher risk countries, with mitigation where appropriate;
- Review education agent and supplier agreements for the inclusion of appropriate modern slavery provisions; and
- Review NextEd policies, manuals and training materials for the inclusion of appropriate modern slavery information.

7. Assessing effectiveness & consultation

7.1. Assessing effectiveness

Only being the second year of reporting NextEd is moving cautiously down the path of reviewing and assessing its diverse operations and various supply chains for compliance and risk in accordance with the Modern Slavery Act. As such we are yet determine the impact and effectiveness of measures taken to date.

We confirm there have been no reports relating to possible modern slavery or human trafficking submitted under our Whistleblower Policy, Code of Conduct, or otherwise.

7.2. Consultation

In preparing this Modern Slavery Statement, NextEd consulted with its directors, the NextEd Senior Leadership Team as well as other key functional and operational managers. It has also undertaken consultation with some suppliers and benchmarked against similar organisations operating within the tertiary education sector.

As noted in section 6.3 above, since the completion of the current Reporting Period, but prior to approval of this Modern Slavery Statement, comprehensive Modern Slavery Awareness training, has been completed by the Senior Leadership team,

their direct reports and is being rolled out to further employees in order to raise awareness.

8. Approval

In accordance with section 13 of the Modern Slavery Act 2018 (Cth) this statement was approved by the Board of Directors of NextEd Group Limited 20th December 2024.

Signed by responsible authorised representative:

Name: Catherine (Cass) O'Connor

Position: Board Chairperson, NextEd Group Limited

Date: 13 December 2024

Signature:

A handwritten signature in dark ink, appearing to read 'C. O'Connor', with a stylized flourish at the end.

Appendix – NextEd entities

Name	Principal Activity	Place of incorporation and operation	Ownership interest	
			2024	2023
RedHill Education Pty Ltd ⁶	Educational Services	Australia	100%	100%
Go Study Australia Pty Ltd ¹	Student Recruitment	Australia	100%	100%
Academy of Interactive Technology Pty Ltd ¹	Educational Services	Australia	100%	100%
International School of Colour and Design Pty Ltd ¹	Educational Services	Australia	100%	100%
Greenwich College Pty Ltd ¹	Educational Services	Australia	100%	100%
Go Study Australia Intercambio Cultural Ltda ²	Student Recruitment	Brazil	100%	100%
Go Study Australia S.A.C. ²	Student Recruitment	Peru	100%	100%
Go Study Australia Sociedad Limitada ³	Student Recruitment	Spain	100%	100%
Go Study Colombia SAS	Student Recruitment	Colombia	100%	-
iCollege International Pty Ltd	Educational Services	Australia	100%	100%
Management Institute of Australia Pty Ltd ⁴	Educational Services	Australia	100%	100%
Management Institute of Australia No.1 Pty Ltd ⁴	Educational Services	Australia	100%	100%
Management Institute of Australia No.2 Pty Ltd ⁴	Educational Services	Australia	100%	100%
Celtic Training & Consultancy Pty Ltd	Educational Services	Australia	100%	100%
Brisbane Career College Pty Ltd	Educational Services	Australia	100%	100%
Capital Training Institute Pty Ltd ⁵	Educational Services	Australia	100%	100%

1. 100% owned by Redhill Education Pty Ltd

2. 75% owned by Go Study Australia Pty Ltd and 25% owned by RedHill Education Pty Ltd

3. 100% owned by Go Study Australia Pty Ltd

4. Companies were all acquired at the same time and are now in liquidation waiting deregistration

5. Ceased trading May 2024

6. change of entity legal status from Limited to Proprietary Limited during 2024