



# Modern Slavery and Human Trafficking Statement FY24

Published: November 2024



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

This statement 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.

This statement is also made by MGH's subsidiaries in the UK: Marron Group UK Holdings Limited (Company Number 11846150) and Navitas UK Holdings Limited (Company Number 6009965) in accordance with section 54 of 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 2023 to 30 June 2024.

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>. In this report we are referring to these entities collectively as "Navitas", "we" or "us".

1 Registered address: Level 26, 101 Collins Street, Melbourne VIC 3000

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

3 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.



Navitas acknowledges the Traditional Owners of the land in Australia and respects all First Nations peoples in the countries in which we operate.

We recognise and respect the continuing living cultures of First Nations peoples throughout the world, and recognise their connections to lands, seas, waterways, sky and Community. We pay our respects to Elders past and present.

Artwork by Whadjuk, Ballardong and Yamatji  
Aboriginal Woman Marcia McGuire.



# MESSAGE FROM GROUP CEO

At Navitas, we're committed to improving our impact.

Last year was a big year for Impact at Navitas. In 2023, we were thrilled to launch our renewed Impact initiative to drive forward our key ESG priorities, with an approach aligned to the United Nations' Sustainable Development Goals (SDGs). Our goal is to understand, measure, and improve the impact we create in our changing world. This includes in the area of Human Rights and Modern Slavery, one of our 12 priority impact topics. We take our responsibilities as an educator, an employer, and a global citizen seriously.

When it comes to modern slavery prevention and eradication, our commitment is to actively identify and mitigate potential modern slavery risks to students, our supply chain, the workforce and our partnerships; to comply with all relevant laws; and, to educate our communities. In producing our first Modern Slavery reports over the past few years, we have identified risks in our supply chain and to our students. This year, committed to research and better understanding our responsibilities, we have reviewed our risk areas and aligned them to our new findings. This has resulted in the addition of a specific risk area related to the risks our students face while studying our programs

In FY24, we established a Modern Slavery working group with representatives from across our global divisions to consider and mitigate potential modern slavery risks facing our students. To date, the working group has conducted a gap analysis on modern slavery resources across our colleges and campuses; developed a reporting tool integrated into our current Wellbeing Health & Safety (WHS) incident reporting system, soon to be available on external channels; and started to develop specific resources to inform students about modern slavery.

This year we also launched essential staff awareness training on modern slavery risks in our supply chain which was completed by more than 700 of our frontline staff and included information to raise awareness, guidance on how to identify potential incidents of modern slavery and instructions on what to do in those instances.

Aside from direct action within our own organisation, I am also proud we have supported work related to Modern Slavery and Human Rights through the Navitas Education Trust (NET)'s support of Adara in Nepal. Adara's NET-supported program brings more education opportunities to communities and decreases the risk of trafficking and modern slavery by keeping kids in school and educating the community on the risks of modern slavery.

We are proud of the work we have achieved so far, but also remain aware of the work that lies ahead of us. We plan to increase business capability to identify and mitigate the risks to students, building on our work from previous years and starting work in other risk areas, including our education agents and operational goods and services supply chains. And as always, we will continue to work alongside our partners to create a better world.

As an educator first and foremost, we are committed to providing the education, resources, and data necessary for our teams to continue learning and improving. Human Rights and Modern Slavery is a global issue, affecting millions of people every year. Creating a world where all individuals can live a safe, dignified, and fulfilling life is something we can and must take responsibility for. In this spirit, we are proud to share our FY24 Modern Slavery and Human Trafficking Statement as just one more step in our ongoing Impact journey.



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

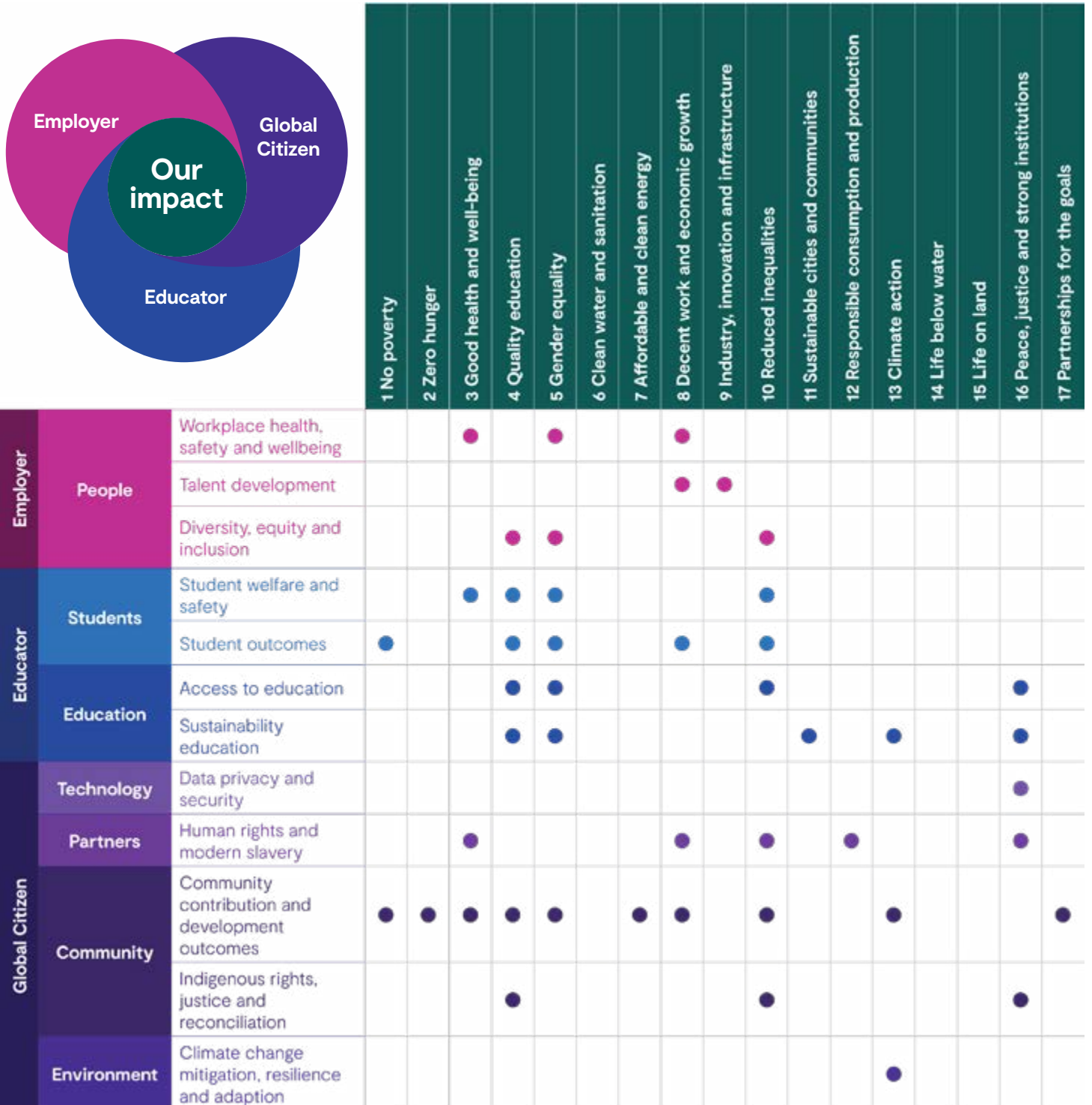




# United Nations' Sustainable Development Goals (SDGs)

The Sustainable Development Goals were established by the United Nations to promote sustainable development worldwide and to facilitate global collaboration and action. They outline focus areas for improving societies, economies and the environment. The SDGs provide a framework for action that can guide governments, organizations, and individuals in their efforts to create a more sustainable world, and we have used them as a framework for our own ESG planning.

Here you can see how our 12 priorities map against the 17 SDGs.



# 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.



60,000  
students yearly



Operating in  
27 countries



5000  
employees



98 colleges and  
campuses across  
global network



Partnerships with  
39 universities



\$3.4million 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.

### Accredited higher 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 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 CHAINS**



## 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 2023 – 30 June 2024, as well as the Global Student Success Programs that operated in North America during that period at Richard Bland College of William & Mary and UMass Boston, and the UNIC and University of Leicester Global Study Centre operations, that we ceased or are ceasing our involvement with after the end of the reporting period.

## University Partnerships Australasia



## University Partnerships North America





## University Partnerships Europe



## Careers & Industry

The Navitas Careers & Industry division delivers accredited higher education and language and employability skills to more than 25,000 learners worldwide.

Through its global network, 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.

## Accredited Higher Education



Sydney

## Language and Employability Skills



## Navitas Education Trust



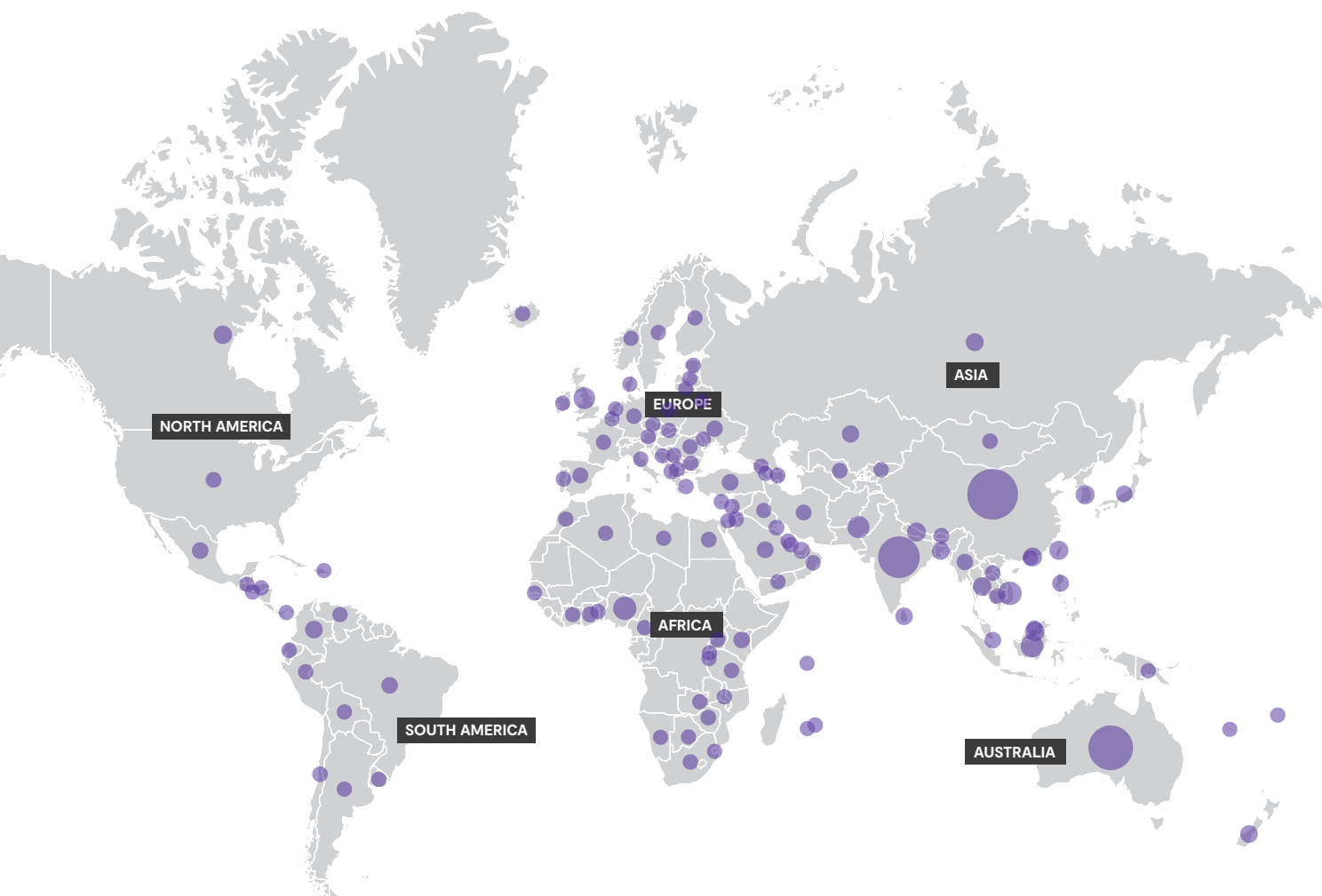
Our purpose of transforming lives through education extends beyond the experiences we offer to our students. The Navitas Education Trust (NET) provides support to not-for-profit development organisations with an education focus to bring about change where it is most needed.

Since 2013, Navitas has contributed annual funds to the NET, assisting numerous world-wide education-based projects. These projects, in turn, have helped many people gain better access to education, improved the quality of offerings, and contributed to teacher training and infrastructure.






# 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. During FY24 we worked with 2,300 contracted agents in 125 countries around the world.

## Navitas education agents by country

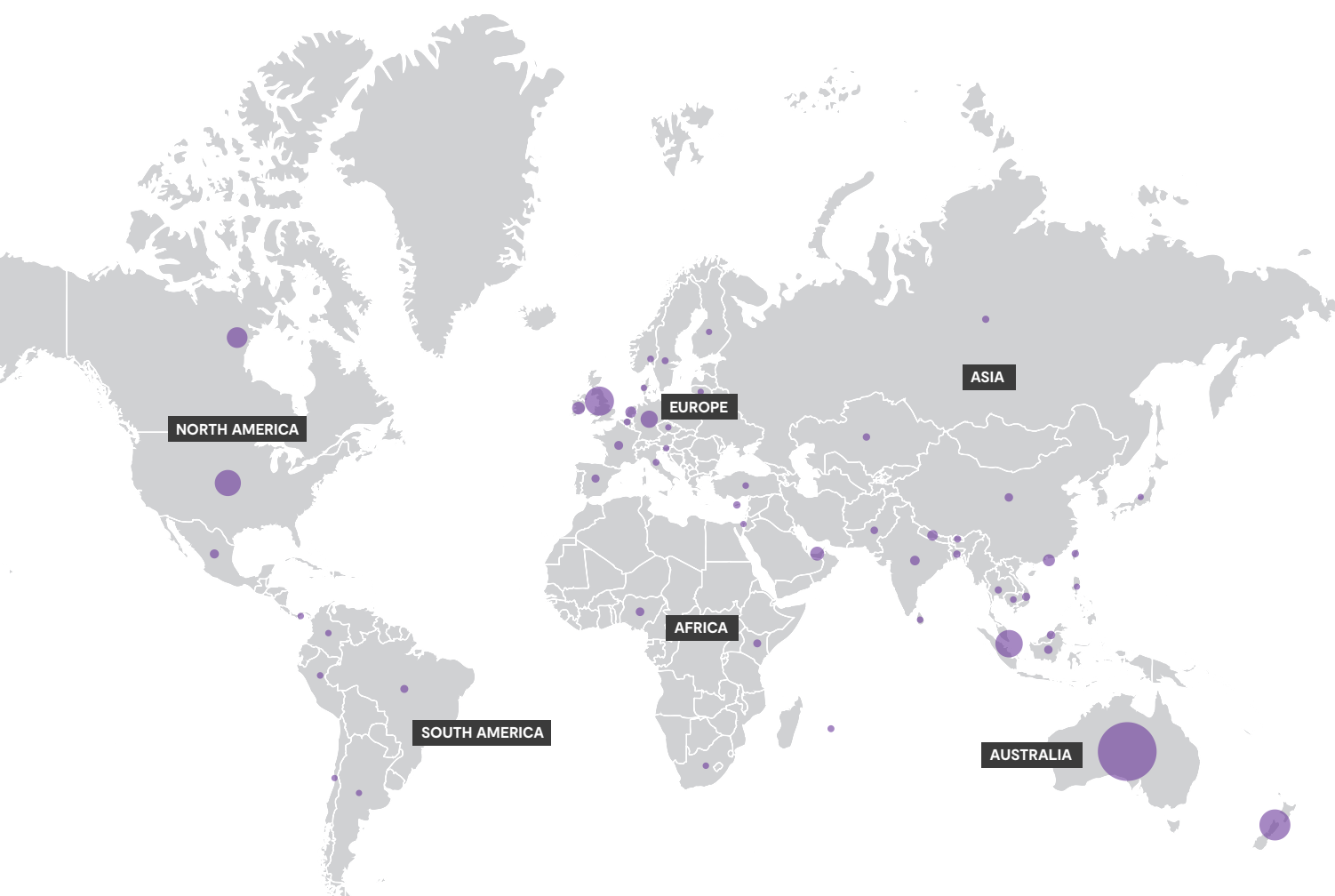


Other than expenditure on our educational agent commissions and incentive programs, analysis of our supply chain identified our procurement activity falls into one of seven categories:

Procurement Category	Example of goods and services procured
 <b>Real Estate</b>	Construction and fit out of premises, rent, utilities, repairs and maintenance.
 <b>Teaching and Learning Materials</b>	Books, teaching materials, examination materials and associated
 <b>Technology and Equipment</b>	Software, telecommunication, IT support services and technology hardware (such as laptops, monitors and peripherals), audiovisual equipment, gym and fitness equipment, musical instruments.
 <b>Brand, Marketing and Communications</b>	Advertising, banners, signage and promotional merchandise such as hats, t-shirts, umbrellas.
 <b>Professional Services</b>	Audit, accountancy, legal services, insurance, consultancy, research and analysis.
 <b>Workplace Services</b>	Office equipment, stationery, furniture and onsite services such as cleaning, catering, waste management, security.
 <b>Travel, Meetings and Events</b>	Venues, air travel, hotels and ground transportation.

Our businesses source from a range of locations with the largest volume of spend sourced from Australia, the United States, the United Kingdom, Singapore, Germany and Canada.

## Navitas suppliers by country







**MODERN SLAVERY RISKS  
IN OUR OPERATIONS  
AND SUPPLY CHAINS**



Navitas understands that all products and services carry the risk of modern slavery practices in their operations and supply chains and that no entity can declare themselves to be slavery free.

We have assessed our risk of modern slavery practices using the framework set out in the United Nations Guiding Principles on Business and Human Rights and also the Australian Government Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities. We have considered the risk that the Group may either cause, contribute or be directly linked to modern slavery through our operations or supply chain. These terms are explained below:

<b>Cause</b>	The risk that our operations directly result in modern slavery occurring (eg we use forced labour in our offices).
<b>Contribute</b>	The risk that our operations and/or actions contribute to modern slavery occurring. This includes acts or omissions that may facilitate or incentivise modern slavery (eg if our negotiations with suppliers to lower costs result in them using forced labour in their own operations or supply chain to meet our requirements).
<b>Directly Linked</b>	The risk that our operations, products or services may be connected to modern slavery through the actions of another entity we have a business relationship with. (eg Electronic goods we purchase to run our operations may have been manufactured by another entity using components produced by forced or child labour).

Source: Commonwealth Modern Slavery Act 2018: Guidance for Reporting Entities

Following a review of our risks during FY24, we have added a specific risk related to students (see below) to ensure we not only cover risks in our recruitment process, but also risks facing students while they are studying with us. Our previous risk areas had captured the risk to students only in our recruitment process (under the risk area 'Education Agents').

# Our operations



## STUDENTS

Young people, especially students, are at a heightened risk of experiencing modern slavery, whether in their home country or the destination country they may choose to study in.

For Navitas, students are a two-fold risk area: in their home country students may be at risk of modern slavery and human trafficking facilitated using student visas (see Education Agents section below). They may also be at risk after they arrive at the destination country for study.

Young people, especially students, are at a heightened risk of experiencing modern slavery, whether in their home country or the destination country they may choose to study in.

We recognise that international students are especially vulnerable to exploitation in the workplace as they have less immediate support when living overseas, a lower level of English or local language skills, and may be unaware of the workplace laws and their entitlements.

Students may be subjected to wage theft, sham contracting, threats of dismissal, excessive hours and deceptive recruitment, in any country where we provide education. This type of exploitation is considered an indicator that modern slavery, such as debt bondage, forced labour and/or forced marriage may be present.



## EMPLOYEES

Navitas employs over 5,000 full time, part time, sessional, fixed term and casual employees across our global operations. The education industry is not recognised as a high-risk industry from a modern slavery perspective due to its regulated nature and skilled nature of work. Additionally, the majority of our workforce is employed on fixed-term or permanent contracts. These factors, combined with our employment policies and processes, reduce the risk of modern slavery being caused by the Group within our directly employed workforce.

We recognise that the risk of modern slavery varies by geography, depending on local laws, customs and practices. Navitas has presence in 27 countries of which UAE is considered to have 'highest' prevalence of modern slavery, as measured by the Global Slavery Index 2023. We therefore consider there to be a high risk that our staff or contractors in UAE may be subjected to modern slavery practices such as excessive working hours, unpaid work, underpayment, or forced labour.



## NAVITAS EDUCATION TRUST (NET)

We conduct due diligence on all the not-for-profit organisations we support through the NET. We only make 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. There is a risk these local organisations may be based in countries where there is a higher prevalence and acceptance of modern slavery practices. This increases the risk that Navitas may be unwittingly linked to modern slavery practices.

In FY24 the NET made grants totalling \$389,879 AUD to organisations delivering educational projects in Vietnam, Cambodia, Nepal, Indonesia, India, and Zambia. Some of these countries are considered to have a high prevalence of modern slavery, as per the Global Slavery Index 2018.



# Our supply chain



## EDUCATION AGENTS

International education agents play an essential role in ensuring Navitas and other organisations continue to provide life-changing learning opportunities for students around the world. Around 85% 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>4</sup>. Evidence suggests trafficking is sometimes facilitated using student, visitor/tourist, or working holiday visas<sup>5</sup>.

We recognise there is a risk that agents who recruit students for overseas education institutions may be directly or indirectly involved in modern slavery 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. There is therefore a risk Navitas could be linked to modern slavery through its network of education agents and their sub-contractors.

<sup>4</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>5</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.



## OPERATIONAL GOODS AND SERVICES

We recognise there is a potential for us to contribute to, or be directly linked to, modern slavery practices through the procurement of the goods and services use to operate our business. Procurement of goods and services that use low-skilled workers, short-term contracts, migrant workers or where sub-contracting and outsourcing is more prevalent increases the risk of being directly linked to modern slavery practices. Additionally, where the product or service is sourced or produced will also influence the risk of modern slavery practices.

Analysis of our supply chain has identified the following higher risk product or service categories that are relevant to our operations:

- electronic equipment
- cleaning services
- branded promotional goods, including clothing
- construction and fit out of new campuses.

In terms of geographic modern slavery risks, we source from 19,801 suppliers globally which are scattered across 85 countries in total. Out of these countries, we work with 71 suppliers located in countries that are identified in the Global Slavery Index by Walk Free (available on <https://www.walkfree.org/global-slavery-index/>) as 'most prevalent' countries for modern slavery.

## OPERATIONAL GOODS AND SERVICES (continued)

### Electronic equipment

Navitas relies on technology and equipment in its operations, including laptops, mobile phones, printers, and audiovisual equipment.

The systemic labour issues in the technology hardware industry are well documented. These include exploitative labour practices due to the low-skilled nature of the work and the low-cost model upon which the industry has been built.

We primarily use Dell technologies for our IT equipment. Dell is a founding member of the Responsible Business Alliance (RBA) and has adopted the RBA code of conduct to hold itself and its supply chain accountable.

However, review of our supply chain data suggests the use of many other suppliers of electronic equipment, particularly audiovisual equipment used by our SAE campuses. Further work is needed to understand the measures taken by these suppliers to reduce the risk of modern slavery within the supply chain.

### Cleaning services

The onsite cleaning services performed in our offices and campuses have been identified as presenting a moderate inherent risk of modern slavery practices.

The cleaning industry is widely known as having a heightened vulnerability to modern slavery practices due to the prevalence of migrant labour in the workforce, the low-skilled nature of the work and known controversies of underpayment and poor treatment of workers.

This risk would change depending upon the country we are operating in, eg cleaners in countries listed as 'high prevalence' on the Global modern slavery index by WalkFree might be at more risk.

### Branded promotional goods including clothing

We procure a variety of promotional products such as hats, lanyards, pens, t-shirts and bags to be used at student recruitment events and business conferences. These products are typically locally sourced from within the countries where the events take place and/or where our businesses are located.

These types of products are often made by low skilled workers in countries such as China, Malaysia, and Vietnam, where there is evidence of labour rights issues including excessive working hours, indentured labour and poor working conditions. The low-cost nature of these products and use of sub-contracting can increase the risk of modern slavery practices.

### Construction and fit out of new campuses

The property and construction sector faces an elevated risk of modern slavery within its operations and supply chains due to the use of lower-skilled workers who are vulnerable to exploitative practices, and the need for raw materials that are often sourced from high-risk geographies. Business models in the sector tend to be heavily based on outsourcing, which increases the complexity of operations and supply chains and decreases the visibility of labour risks and impacts.

In FY 24 we were involved in, or planning for, the construction and fit out of campuses or offices in Australia, Dubai and Vietnam. We engage only with reputable contracting companies registered with authorities, and with registered employees. This ensures full compliance of labour rights for their employees, and the overall site conditions are well monitored with a qualified engineer supervising at all times.









# **OUR RESPONSE TO OUR 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

In FY24, we established a Modern Slavery Working Group with the intent to address our gaps in the above assessment, specifically the newly identified risk to students. Additionally, we tied modern slavery into our annual ESG reporting framework to help us measure and track progress in this area.

The MGH Board has responsibility for overseeing the Group's response to modern slavery risks. The Board has approved the Group's Modern Slavery and Human Trafficking Policy which sets out our expectations of divisions to identify and manage the risk of modern slavery. The Executive Leadership Team (ELT) consists of divisional CEOs and reports to the Board. The appointment of an ESG director to the Executive Leadership Team in FY23 has enabled progress towards monitoring and managing the Modern Slavery risks across the organisation. The CEOs of each of our divisions are ultimately responsible for managing modern slavery risks in their areas of operation and are accountable to the Group CEO and the Board.

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### Marron Group Holdings Board

**Chair/ Representative:** Group CEO

- Receives periodic reporting.
- Provides governance over modern slavery risks.
- Reviews the effectiveness of policies and procedures to address modern slavery risks.
- Approves annual Modern Slavery and Human Trafficking Statement.

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### Executive Leadership Team (ELT)

**Chair/ Representative:** Director of Environment, Social, and Governance (ESG)

- Approves Group Modern Slavery Policies & Frameworks.
- Accountable for managing modern slavery risks.
- Appoints modern slavery risk owners who will sit on the ESG Steering Committee.
- Approves Group wide minimum procurement standards expected of divisions.
- Endorses the annual Modern Slavery and Human Trafficking Statement.

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### ESG Steering Committee

**Chair/ Representative:** General Counsel

- Proposes Group Modern Slavery Policies & Frameworks.
- Oversees progress in and provides support to the Group's ESG initiatives (including modern slavery)

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### Modern Slavery Working Group

**Chair/ Representative:** Group Risk & Assurance Manager

- Develops Modern Slavery Action plan.
- Shares best practice across the Group
- Drafts annual Group Modern Slavery and Human Trafficking Statement.
- Designs and implements reporting systems

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### Corporate and Divisions (GSM, C&I, UPA, UPE, UPNA)

**Chair/ Representative:** Nominated by divisions

- Designs and implements divisional policies and procedures to address modern slavery risks in line with group policies and frameworks.
- Designs and implements actions to address modern slavery risks.
- Designs and implements processes for remediating any instances where modern slavery is identified.
- Provides data and information to support annual Group reporting.



Our 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 our policies that are relevant in the context of modern slavery.

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### **Values in Action (Code of Conduct)**

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.

It includes how to report non-compliant, illegal, or unethical behaviour or actions via our [Speak Up portal](#).

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### **Whistleblowing Policy**

Defines reportable conduct and provides details of how people can report such conduct including via our [Speak Up portal](#) (see above).

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### **Environmental, Social and Governance (ESG) Policy**

Outlines our environmental, social, and corporate governance principles, including:

- supporting the protection of internationally proclaimed human rights, in particular to support initiatives to promote access to a quality education in disadvantaged communities and to not knowingly engage in business situations that could result in the Navitas Group causing, contributing to or being directly linked to human rights abuses;
- upholding freedom of association and the effective recognition of the right to collective bargaining;
- 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.

All employees are required to take these principles into account in their decision making.

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### **Group Delegations of Authority**

The Group Delegations of Authority embed the requirement for all staff to take ESG principles into account when exercising delegated authority.

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### **Modern Slavery and Human Trafficking Policy**

Sets out minimum standards expected of our divisions to address the risk of modern slavery and human trafficking in their operations or supply chains.

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### **Group Procurement Policy**

Outlines Navitas requirements for the procurement of goods and services. This includes:

- requirements that goods and services are sourced in a socially and ethically responsible manner
- expectations for due diligence and the minimum standards we expect our suppliers to meet, and
- requirements for ongoing monitoring of suppliers and reporting of concerns.

# Action taken in FY24 to mitigate identified risks

## Our operations



### RISK AREA #1 Students

#### ACTION TAKEN

We have mapped modern slavery risks against the student life cycle in order to identify key points of risk in the student journey. We are consulting with staff in our recruitment offices and colleges to validate the identified risk areas and develop activities to mitigate the risks.

This process identified a risk not previously captured in our Modern Slavery Statement, namely the risk students can face while studying relating to unethical employment practices. The Modern Slavery Working Group has been established to address this specific risk. It has three objectives for 2024:

1. To establish a mechanism for reporting instances of modern slavery
2. To conduct an audit of current information/ resources available to students at our colleges and campuses
3. To develop specific information for our international students about modern slavery and human trafficking to address gaps identified in the audit

To date the group has worked on integrating modern slavery incident reporting into our existing Workplace Health and Safety (WHS) incident reporting system, DoneSafe. This is planned to be operational and accessible from our intranet and internet by early 2025. The incidents will then be reported directly to the Workplace Health and Safety team at Navitas to enable timely triage, response and reporting.

The working group conducted a gap analysis on modern slavery resources across all our colleges and campuses. This review indicated the need to develop information and education for students that is accessible across all stages of the student lifecycle. Work has commenced to design and develop website content, training and other resources for students.

#### LOOKING AHEAD

We will continue to work towards increasing awareness about Modern Slavery risks, and to build awareness of the newly integrated DoneSafe for modern slavery incident reporting.

The planned reporting tool on DoneSafe will allow any modern slavery incident or hazard to be reported directly to the Workplace Health and Safety team at Navitas. This DoneSafe tool is scheduled to be rolled out in 2025.







## **RISK AREA #2** **Employees**

### **ACTION TAKEN**

We are 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.

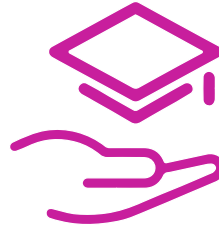
As set out in Navitas' Values in Action, we expect our staff to comply with all relevant laws and regulations in every country of operation at all times and to ensure written agreements formally document the organisation/employee relationship.

During FY24 we continued to raise awareness of modern slavery risks among employees and established a single point of contact for employees to ask questions or raise concerns related to modern slavery ([modernslavery@navitas.com](mailto:modernslavery@navitas.com)).

We also launched and promoted staff awareness training on Modern Slavery risks and mitigating actions in our operations and supply chain. We offered this training to our employees in student-facing roles, including the college-based staff in Australia, and the Sales and Marketing staff in Nigeria, Kenya, Pakistan, India, Bangladesh, China, Hong Kong, Singapore, Malaysia, Vietnam, Indonesia, Latin America, South Korea, and Dubai. Approximately 97%, or 296 staff from our Global Sales and Marketing teams completed the training.

### **LOOKING AHEAD**

We will continue to work towards increasing awareness about Modern Slavery risks, the reporting tools we currently have available (Whistleblowing platform and Modern Slavery mailbox), as well as the new Donesafe reporting tool once it is implemented. We will be rolling out the mandatory staff awareness training on Modern Slavery to our European and North American counterparts in FY25, and also developing Modern Slavery Awareness training that is specific to the education sector.



## **RISK AREA #3** **Navitas Education Trust**

### **ACTION TAKEN**

We have included modern slavery clauses within our NET funding agreement and made inquiries with grant recipients regarding their compliance with relevant elements of the Navitas Minimum Standards for Suppliers.

### **LOOKING AHEAD**

In future years we will strengthen our due diligence criteria and require short-listed applicants to demonstrate the processes and controls they have in place to oversee the activities of any third-party organisations they partner with.

# Our supply chain



## RISK AREA #4 Our education agents

### ACTION TAKEN

Modern Slavery and Human Trafficking considerations are now included within our pre-contract agent screening processes.

Modern slavery clauses are now included within our agent agreements.

In FY24, we developed a report analysing data on student behaviour and agents. This report is intended to identify red flags and prompt further scrutiny of agents where suspicious student behaviour is identified (eg students not arriving at college to start program).

### LOOKING AHEAD

In FY25 we plan to:

1. Develop improved agent selection and monitoring systems through our modern slavery working group.
2. Continue to improve our agent reporting systems to improve identification of suspicious activity
3. Improve agent awareness of modern slavery and human trafficking risks and inform them of their obligations and how they may inadvertently contribute to modern slavery and human trafficking. The working group has already started developing training content for agents.
4. Share information on modern slavery developed specifically for students on our websites. The reporting tool on DoneSafe referred to in Risk Area #1 above is also planned to be made available to access on the websites. We will then ensure that agents are aware of information available to students and the new reporting tool.



## RISK AREA #5 Operational Goods and Services

### ACTION TAKEN

In line with the Group Procurement Policy we have introduced a requirement for new suppliers to sign a compliance declaration committing to adhere to, or work towards, the Navitas Minimum Standards for Suppliers or otherwise have include equivalent terms in the relevant supply contract or the supplier's own code of conduct which it commits to comply with.

Divisions have considered the requirements of the Group Procurement Policy and are incorporating these requirements within their procurement processes.

### LOOKING AHEAD

We will develop tools to help staff assess the risk of modern slavery practices in any goods or services to be procured. We will require enhanced due diligence before engaging with suppliers of higher risk goods and services.

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.

We will also review our supply chain data for our suppliers of electronic equipment, particularly audiovisual equipment used by our SAE campuses to understand the measures taken by these suppliers to reduce the risk of modern slavery within the supply chain.



**ASSESSING THE  
EFFECTIVENESS  
OF OUR ACTIONS**



During this reporting period we have focused on identifying risks to our students and developing awareness resources for them, strengthening our modern slavery reporting systems, and training our staff on modern slavery risks in our business and mitigating actions.

We cannot easily or adequately assess the effectiveness of measures we are taking. However, we have established expectations for modern slavery risk management through our Modern Slavery and Human Trafficking Policy as summarised in the table below. Progress against these expectations is reported to the MGH Board as part of the Navitas risk-reporting process.

Criteria	Expectation
<b>Accountability for modern slavery issues, with an identified risk owner</b>	A risk owner has been identified for addressing modern slavery issues in operations and supplier chains.
<b>Policies</b>	Policies and procedures have been implemented to manage the risk of modern slavery.
<b>Supply chain mapping and risk assessment</b>	Supply chains have been mapped and understood. The risk of modern slavery in operations and supply chains has been assessed.
<b>On-boarding and contracting</b>	Due diligence is performed on new suppliers to determine their risk level in relation to modern slavery. Contracts contain appropriate modern slavery clauses.
<b>Audit and compliance program</b>	Supplier performance is monitored to confirm ongoing compliance.
<b>Training</b>	Team members receive adequate training in relation to modern slavery and any supporting processes applicable to their role.
<b>Complaints mechanism</b>	An accessible and well-publicised reporting mechanism is in place for disclosure of modern slavery concerns. The reporting mechanism allows for confidential and anonymous reporting and provides protection from reprisal. There must be clear processes for investigating and reporting on the issues raised through the reporting mechanism.
<b>Remediation</b>	Processes are in place to support suppliers to remediate breaches of the minimum standards.
<b>Stakeholder engagement</b>	Approaches to stakeholder engagement are in place.
<b>Review</b>	The effectiveness of the modern slavery risk management measures must be monitored and annually reviewed.

Our focus for subsequent reporting periods will be to develop meaningful Key Performance Indicators (KPIs) to measure the effectiveness of the actions taken to identify and address modern slavery practices in our operations and supply chains.

In FY24, we received five reports from whistleblowers. None were related to Modern Slavery. All reports capable of being addressed under the Whistleblower Policy were investigated and addressed. A summary of whistleblower reports is provided to the Board quarterly with any significant matters being reported immediately.

In FY24, there were zero modern slavery incidents reported in our operations and supply chain.



# **CONSULTATION AND APPROVAL**



## Consultation

In preparing this Modern Slavery and Human Trafficking Statement, Navitas has consulted with the Modern Slavery Working Group, 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, Group Risk, Group HR, Group Finance functions, and the NET Manager.

## Approval

This Modern Slavery and Human Trafficking Statement was approved by the Board of Directors of MGH on 23 October 2024.

A handwritten signature in black ink, appearing to read 'Rod Jones', written over a white background.

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

# **APPENDICES**



# 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 Australian 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	Not applicable	Australia
IBT Education Pty Ltd	Not applicable	Australia
IBT (Sydney) Pty Ltd	Not applicable	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
Navitas College of Health Pty Ltd	Not applicable	Australia
Navitas College of Public Safety Pty Ltd	Not applicable	Australia
Navitas Skilled Futures Pty Ltd	Navitas Skilled Futures	Australia

Entity Name	Trading Name(s)	Location
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 Professions	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	Not applicable	Australia
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
Newcastle International College Pty Ltd	Not applicable	Australia
SAE Institute Pty Limited	SAE Creative Media Institute SAE University 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	Women & Leadership Australia	Australia
Fraser International College Limited	Fraser International College	Canada
International College of Manitoba Limited	International College of Manitoba	Canada
Navitas Canada Holdings Inc	Not Applicable	Canada
SAE Institute Inc	SAE Creative Media Institute	Canada
International College of Toronto Limited	Toronto Metropolitan University International College	Canada
Wilfrid Laurier International College Limited	Wilfrid Laurier International College	Canada
Beijing Navitas Education Consulting Co. Limited	Not applicable	People's Republic of China
Navitas France SARL	ICN International College Paris	France
Navitas Germany GmbH	SRH International College Lancaster University – Leipzig Campus	Germany
Navitas Eduservices Private Limited	Not applicable	India
Anuvac Confab Worldwide Private Limited	Not applicable	India
Ausedken Limited	Not applicable	Kenya

Entity Name	Trading Name(s)	Location
Study Overseas (Mauritius) Holding Limited	Not applicable	Mauritius
Navitas Netherlands B.V.	The Hague Pathway College, Twente Pathway College	The Netherlands
Navitas Nigeria Pty Limited	Not applicable	Nigeria
Christchurch Institute of Business and Technology Limited	UC International College	New Zealand
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
Zunzil Invest S.L.	Not applicable	Spain
Australian College of Business and Technology (Private) Limited	ACBT ECU Sri Lanka	Sri Lanka
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	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
Keele University International College Ltd	Keele University International College	United Kingdom
Leicester Global Study Centre Limited	Leicester Global Study Centre	United Kingdom
London Brunel International College Limited	Brunel University London Pathway College	United Kingdom
Navitas UK Holdings Limited	Not applicable	United Kingdom
Navitas SAE 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	International College Robert Gordon University	United Kingdom
SC170551 Limited	Not applicable	United Kingdom
SC255447 Limited	Not applicable	United Kingdom
UA 92 Global Limited	UA 92 Global	United Kingdom
Women and Leadership International (UK) Limited	Not applicable	United Kingdom

Entity Name	Trading Name(s)	Location
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 South Prince George LLC	Richard Bland College of William & Mary Global Student Success Program	United States of America
Navitas Boston LLC	UMass Boston Global Student Success Program	United States of America
Navitas New York LLC	Queens College 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
ULethbridge International College Calgary Limited	ULethbridge International College	Canada
NVT Consulting Company Limited	Not applicable	Vietnam
Navitas SAE Holdings Limited	Not applicable	United Kingdom



# Appendix B – Mandatory Criteria Mapping

Modern Slavery Act Mandatory Criteria	Section Reference	Page Number
Identify the reporting entity	Contents	2
Describe the reporting entity's structure, operations and supply chains.	Our structure, operations and supply chains	8
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	Modern slavery risks in our operations and supply chains	14
Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	Our response to our modern slavery risks	20
Describe how the reporting entity assesses the effectiveness of these actions.	Assessing the effectiveness of our actions	28
Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).	Consultation and approval	30
Any other information that the reporting entity, or the entity giving the statement, considers relevant.	About Navitas	6



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