

**EDU Holdings SPV Pty Limited
EDU Investment SPV Pty Limited
Study Group Pty Limited
Study Group Finance Pty Limited
Study Group Australia Pty Limited**

**JOINT MODERN SLAVERY STATEMENT
FOR THE YEAR ENDED 31 DECEMBER 2020**

We are committed to the prevention of modern slavery
in our operations and supply chains

EDU Holdings SPV Pty Limited ACN 143 998 127

Registered office
Level 1, 63 Oxford Street,
Darlinghurst
NSW 2010
Australia

1. Reporting entities

The Modern Slavery Act 2018 (Cth) requires an Australian entity with annual consolidated revenue of at least A\$100 million to prepare a Modern Slavery Statement (**Statement**).

This is a joint Statement on behalf of the following reporting entities (collectively, **EDU**) for the year ended 31 December 2020:

- EDU Holdings SPV Pty Limited (**EDUH**)
- EDU Investment SPV Pty Limited (**EDUI**)
- Study Group Pty Limited (**SG**)
- Study Group Finance Pty Limited (**SGF**), and
- Study Group Australia Pty Limited (**SGA**).

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

Practices that constitute modern slavery can include:

- human trafficking – the recruitment, harbouring and movement of a person for exploitation through modern slavery
- slavery – where an offender exercises power of ownership over a victim, including the power to make the person an object of purchase and use their labour in an unrestricted way
- servitude – where a victim’s personal freedom is significantly restricted, and they are not free to stop working or leave their place of work
- forced labour – where the victim is either not free to stop working or not free to leave their place of work
- debt bondage – where the victim’s services are pledged as security for a debt and the debt is manifestly excessive or the victim’s services are not applied to liquidate the debt, or the length and nature of the services are not limited and defined
- forced marriage – where coercion, threats or deception are used to make a victim marry or where the victim does not understand or is incapable of understanding the nature and effect of the marriage ceremony
- the worst forms of child labour – where children are exploited through slavery or similar practices (including sexual exploitation), engaged in hazardous work which may harm their health, safety or morals or used to produce or traffic drugs.

2. Structure, operations and supply chains of EDU

2.1 Structure and operations

The information in this section relates to the year ended 31 December 2020 and remains current at the date of this Statement.

EDU is part of the Study Group group of companies (**Study Group**), a leading provider of international education, headquartered in the UK. The Study Group vision is to create a better world through education, and its mission is to be the leading provider of international education, driving success for our students and partners.

Study Group works with leading universities across the UK, Europe, North America and Australasia. We nurture ambitious students from diverse academic backgrounds and prepare them for success at their chosen university.

EDUH is registered in Australia, operates as a holding company and controls the following entities:

Company name	Company number
Applied Training Pty Limited (AT)	ACN 600 726 403
Australian Institute of Applied Sciences Pty Limited (AIAS)	ACN 083 349 722
EDU Investment SPV Pty Limited (EDUI)	ACN 144 017 425
Study Group Australia Pty Limited (SGA)	ACN 070 919 327
Study Group Finance Pty Limited (SGF)	ACN 120 929 811
Study Group Pty Limited (SG)	ACN 120 929 311
Study Group New Zealand Limited (SGNZ)	1012808
Taylors Institute of Advanced Studies Limited (TIAS)	ACN 005 432 155

AT, AIAS, EDUI, SG and TIAS are registered in Australia and are non-trading entities.

SGA is registered in Australia and operates as an education provider in Australia. SGF is registered in Australia and provides centralised services to Study Group. SGNZ is registered in New Zealand and operates as an education provider in New Zealand.

SGA has a 50% interest in a joint venture with the University of Sydney, called The University of Sydney Foundation Program Pty Limited (**USFP**). USFP provides University of Sydney Preparation Programs and sub-contracts to SGA to undertake operational and teaching obligations under an Administration & Services Agreement. Under this significant contractual relationship, USFP utilises SGA's supply chains. Further details of these supply chains are provided below.

SGA has pathway agreements with The Australian National University, Flinders University and The University of Western Australia. SGA has an agreement with Charles Sturt University to provide metropolitan International Study Centres (currently in Brisbane, Melbourne and Sydney) at which SGA delivers higher education courses (under-graduate and masters programmes) on behalf of the university. SGNZ has pathway agreements with The University of Auckland and The University of Waikato.

SGA and SGNZ pathway programmes are specially designed, university-recognised courses that help students to gain entry to top universities in Australia and New Zealand. Our pathway programmes include Academic English Preparation, Access English, English & Wellbeing Enhancement Series (EWES) workshops, Foundation Studies, diplomas, bachelors, under-graduate degrees, and pre-masters programmes. Our programmes provide the academic, English language and learning skills students need to succeed.

2.2 Supply chains

The information in this section relates to the year ended 31 December 2020.

EDU only engages with vendors through its subsidiaries SGA and SGNZ (collectively, **SGANZ**). SGANZ's supply chains include:

- Products and services provided directly to SGANZ by vendors
- Products and services used by indirect vendors in SGANZ's supply chain

SGANZ deals with the following types of vendor:

- Accountants, academic/business consultants, lawyers, insurance brokers and insurers
- Banks and financial services companies
- Book, periodical and stationery suppliers
- Caterers, food/beverage retailers and suppliers
- Cleaning and sanitation
- Couriers, transport and postal services

- Document management providers
- Education agencies*
- Facilities management providers, landlords and rental agents*
- Event management companies, hotels and other venues
- Independent contractors who work within the business
- IT services, hardware, software, printing and peripheral suppliers*
- Miscellaneous small retailers e.g. florists, newsagents and gift suppliers
- Office equipment suppliers
- Promotional merchandise suppliers
- Professional associations, institutes and unions
- Recruitment agencies
- Security providers
- Student accommodation and welfare providers
- Training companies
- Travel agents and travel companies
- Uniform and academic dress hire providers
- Universities
- Utilities and telecommunications providers

* These are SGANZ’s largest vendors by expenditure.

3. Risks of modern slavery practices in the operations and supply chains of SGANZ

Having considered the inherent modern slavery risks in its operations and supply chains (**Risks**), EDU has concluded that there is a risk of EDU being directly linked to any of the modern slavery practices defined in section 1 of this Statement, through the activities of an external entity.

During the year ended 31 December 2020, EDU operated exclusively in Australia and New Zealand. According to the Global Slavery Risk Index risk ratings, these are low risk countries. However, the education sector is not immune from the risks of modern slavery practices. It is possible that by using an intermediary to apply for enrolment at an education provider, international students could be subjected to forms of modern slavery such as debt bondage. Students may also experience forced labour, forced sexual exploitation, forced marriage or servitude.

EDU has completed a desktop assessment of the Risks by analysing SGANZ vendors for the year ended 31 December 2020. Having reviewed the ‘Initial list of goods at risk of being produced by modern slavery’ in The Global Slavery Index 2018 (Walk Free Foundation), EDU has concluded that electronics (laptops, computers and mobile phones) are highest risk goods likely to feature in its supply chains.

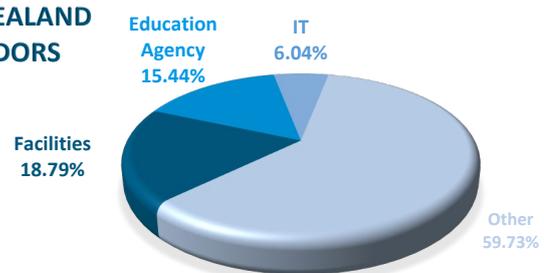
SGANZ’s largest vendor categories are shown in the pie charts below.

AUSTRALIAN VENDORS



Pie chart of 3 largest vendor categories

NEW ZEALAND VENDORS



Pie chart of 3 largest vendor categories

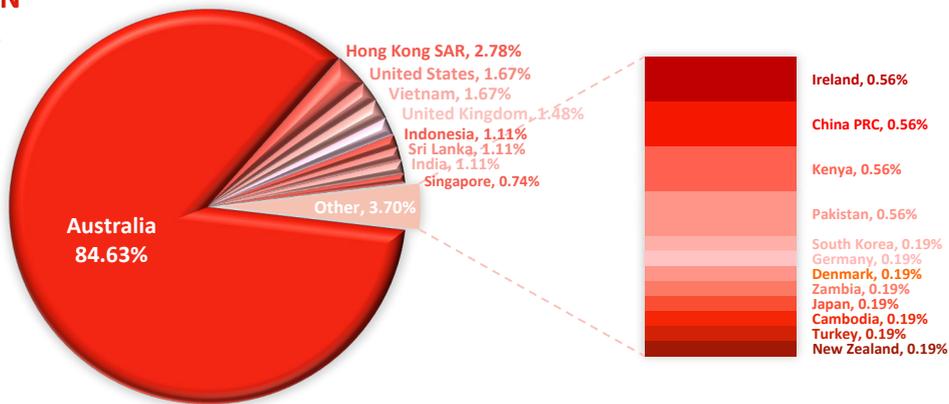
SGANZ has also mapped its vendors' country of origin against the Global Slavery Index. The pie charts overleaf show the countries of origin of SGANZ vendors during the year ended 31 December 2020. Based on the Global Slavery Index risk ratings:

- 1% of SGA's vendors are located in high risk countries.
- None of SGNZ's vendors are located in high risk countries.

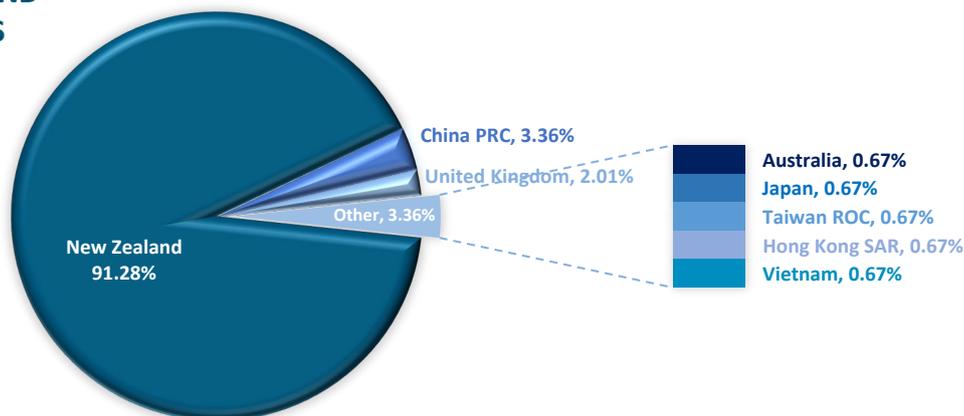
All SGANZ vendors located in high risk countries are education agencies. Study Group has contractual relationships with a wide range of education agencies, who recruit international students and assist them with the process of applying and enrolling at our SGANZ colleges.

Global Slavery Index	SGANZ Vendor Countries of Origin
Low Risk	Australia, China PRC, Denmark, Germany, United Kingdom, Hong Kong SAR, Ireland, Japan, New Zealand, South Korea, Sri Lanka, Taiwan ROC, United States
Medium Risk	India, Indonesia, Singapore, Vietnam, Zambia
High Risk	Cambodia, Kenya, Pakistan, Turkey

AUSTRALIAN VENDORS



NEW ZEALAND VENDORS



4. Actions taken by EDU to assess and address the Risks

EDU has identified the following actions to assess and address the Risks:

4.1. *University partner engagement*

EDU has engaged with a number of its university partners to assess whether there are likely to be incidences of modern slavery practices in its operations.

4.2. *Student awareness*

Although substandard working conditions or underpayment of workers are not the same as modern slavery, these practices may be present in some situations of modern slavery, or can escalate into modern slavery if not addressed. Many students choose to work during their studies. This work can often be low paid and temporary/casual in nature. SGA provides information to students about their employment rights in Australia and how to resolve workplace issues, such as through the Fair Work Ombudsman. SGNZ provides information to students about their employment rights in New Zealand and how to access support in resolving workplace issues, such as through the Citizens Advice Bureau and Community Law Centres.

4.3. *Education agency monitoring*

The standard terms and conditions for education agencies require compliance with all applicable laws, including modern slavery legislation. The high ethical standards required of Study Group education agencies are reinforced in the Global Agent Code of Conduct.

Study Group's Partner Management team and ANZ Product Sales team are involved in managing SGA's relationship with its education agents. Partner Sales Managers perform monitoring activities including but not limited to reviewing student and staff feedback, observing agents at work at education fairs, regular communication and meetings with the agent and data analysis. By building close relationships with agents, the Sales team is well positioned to monitor education agencies' practices and behaviour.

4.4. *Study Group staff conduct*

Study Group has a global Code of Conduct for staff, which emphasises the importance of following legal requirements and emphasises Study Group's commitment to navigate our global business ethically, responsibly, with moral integrity and having regard to our impact on the environment, business ethics and employment practices. We can only accomplish this if consideration for these objectives is integrated into our decision making.

4.5. *Delegation of authority policy*

Study Group has a global Delegation of Authority Policy, which defines who can enter into binding business commitments such as contracts or agreements with third parties and who can approve expenditure. Authorised delegates are expected to exercise good business judgement and only approve contracts, agreements or expenditure in line with Study Group's strategies, budgets and procedures. Study Group's global procurement team requires authorised delegates to complete a New Supplier Request Form before entering into a contract or agreement.

4.6. *Encouraging the reporting of wrongdoing*

Study Group has a global whistleblowing policy that encourages the reporting of wrongdoing, including violations of human rights such as modern slavery. A whistleblowing hotline and online reporting tool is available, which is hosted by an external third party. All whistleblowing reports will

be thoroughly investigated, and remedial action taken.

4.7 Establishing a position on remediation

If EDU discovered that it was directly linked to modern slavery through an external entity, we would use our leverage to work with the entity to prevent or mitigate the harm and its recurrence. If our engagement with the entity was unsuccessful, we would consider terminating our business relationship with that entity, depending on the nature of the breach and the external entity's ability to remedy it.

4.8 Public commitment to addressing modern slavery risks

EDU is publicly communicating its actions to address modern slavery risks by publishing this Statement.

5. Effectiveness of actions to assess and address the Risks

EDU has assessed the effectiveness of its actions to date by preparing and reviewing this Statement.

EDU will assess the effectiveness of its actions through annual reviews of its processes, including student awareness and staff training, reviewing whistleblower incidents, partnering with its university and education agent network and making periodic compliance reviews.

6. Consultation process

A Director of EDUH engaged in a consultation process with EDUH's operating subsidiaries by:

- discussing modern slavery risks with the SGA and SGNZ Directors,
- discussing modern slavery risks with an SGF Director,
- seeking information on modern slavery risks from the Study Group Legal team, Study Group Procurement team, SGANZ Governance, Compliance, Quality and Risk team and SGANZ Colleges, and
- obtaining and analysing data on SGANZ vendors.

EDUH did not consult with AT, AIAS, EDUI, SG or TIAS because they are non-trading entities.

7. Other information that EDU considers relevant

EDU plans to take a number of actions to assess and address the Risks.

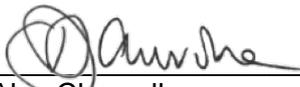
EDU will improve the way in which it assesses and addresses Risks to its operations as follows:

- by continuing to collaborate with our university partners to share information about identifying and managing Risks
- by enhancing orientation materials to include information about modern slavery and the risks to students
- by providing an awareness module to help students identify and understand the risks of modern slavery and to provide information and contact details for assistance and support
- by providing information to College staff about how to identify modern slavery, potential signals of modern slavery and requiring Colleges to monitor and report any concerns
- by expanding its Safeguarding Reports to include a reporting line on any students affected by modern slavery.

EDU will improve the way in which it assesses and addresses Risks to its supply chains as follows:

- by improving supplier due diligence, including by updating the Study Group New Supplier Request Form to include a request for a copy of the supplier's modern slavery statement
- by providing communications to help all staff understand the risks of modern slavery
- by contacting a risk-based audit of a targeted group of vendors (based on expenditure during the year ended 31 December 2020 and on risk exposure) to obtain a copy of their modern slavery statements or to require that they complete a modern slavery survey about their supply chains
- by assessing vendors' modern slavery statements or survey results
- by engaging with vendors to discuss any areas of concern in their modern slavery statements or survey results
- by surveying confirmed students and offer holders to gain a better understanding of their experience with agents and to identify any actions insights
- by reviewing whistleblowing incidents
- by developing and progressively rolling out standard contract clauses that require vendors to assist SGANZ to comply with the Modern Slavery Act 2018 (Cth).

This Statement has been approved by the Boards of EDU Holdings SPV Pty Limited, EDU Investment SPV Pty Limited, Study Group Pty Limited, Study Group Finance Pty Limited and Study Group Australia Pty Limited (being the principal governing bodies of the reporting entities)



Alex Chevrolle

Managing Director, ANZ

For and on behalf of

EDU Holdings SPV Pty Limited, EDU Investment SPV Pty Limited, Study Group Pty Limited, Study Group Finance Pty Limited and Study Group Australia Pty Limited

[16] June 2021