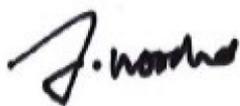


# Modern Slavery Statement FY2024

# Message from us

CBLA supports international efforts to prevent modern slavery in businesses and supply chains. Slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour, forced marriage, debt bondage and human trafficking, whether adults or children, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain. CBLA has a zero-tolerance approach to modern slavery. That means we are committed to acting ethically and with integrity in all our business dealings and relationships and committed to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business, or in any of our supply chains.

With this modern slavery statement, CBLA is strengthening its commitment to sustainability and human rights. We know there is much to do in this space and are committed to reviewing and improving our operations to prevent modern slavery.



**Francesca Woodward**

Chair | On behalf of the Board of Directors of  
Cambridge Boxhill Language Assessment  
Pty Ltd ATF Cambridge Boxhill Language  
Assessment Unit Trust



**Jaime Cortes**

Chief Executive Officer

12 November 2024

# Reporting entity

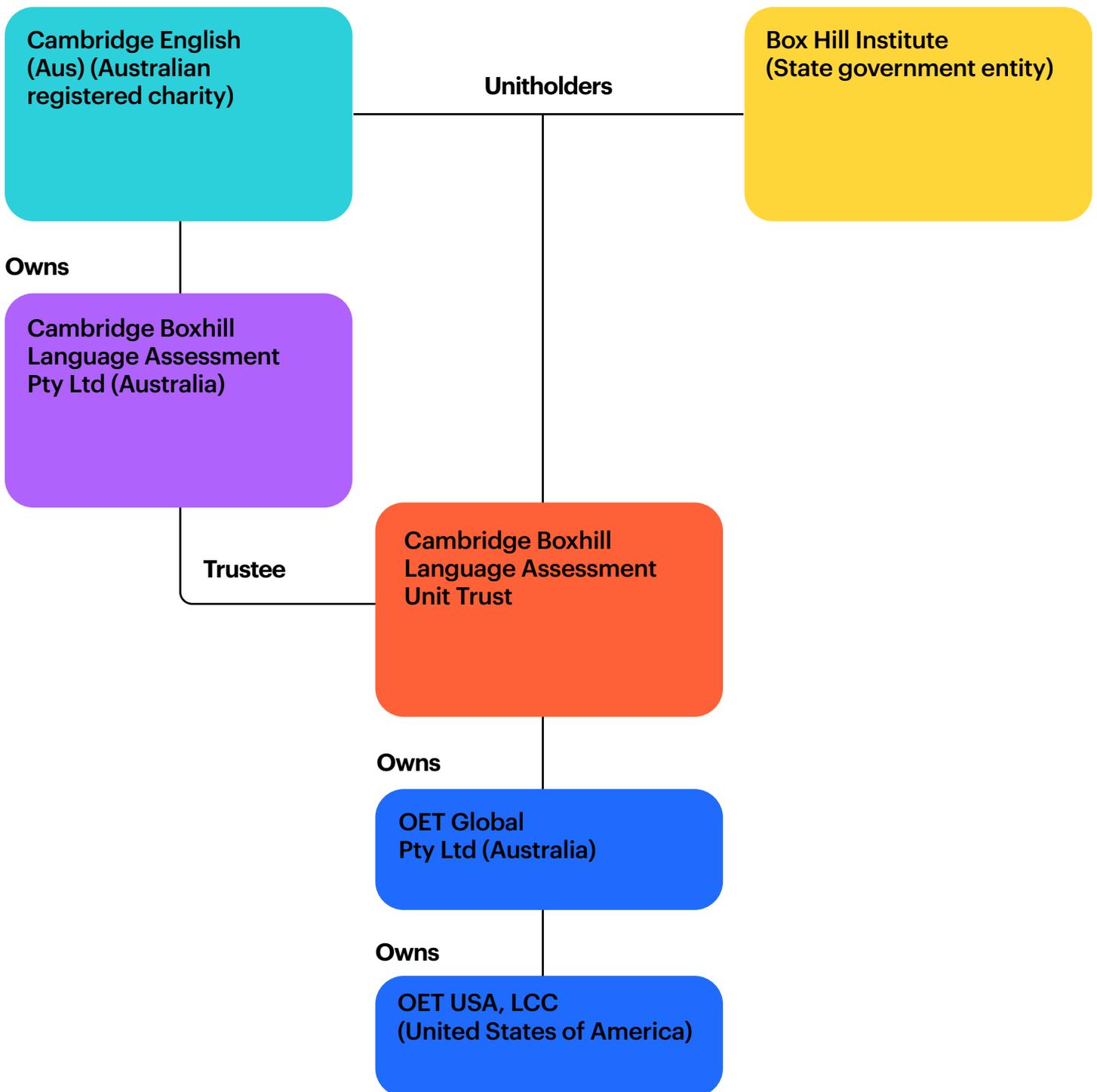
<b>Name</b>	Cambridge Boxhill Language Assessment Pty Ltd ATF Cambridge Boxhill Language Assessment Unit Trust
<b>ACN</b>	159 885 257
<b>Trading name</b>	OET
<b>Entity type</b>	Australian Proprietary Company
<b>Registered office</b>	Level 17, 452 Flinders Street, Melbourne VIC 3000
<b>Place of incorporation</b>	Australia
<b>Status</b>	Resgistered

This modern slavery statement relates to the 1 August 2023 to 31 July 2024 reporting period for the purposes of the Modern Slavery Act 2018 (Cth) in Australia and Modern Slavery Act 2015 in the United Kingdom.

# Our structure

OET is owned by Cambridge Boxhill Language Assessment, a venture between Cambridge English (Australia) and Box Hill Institute.

In this modern slavery statement, “we”, “us” or “our” refers to Cambridge Boxhill Language Assessment Pty Ltd as trustee for the Cambridge Boxhill Language Assessment Unit Trust and its subsidiaries.



# Our operations

We are a global business that delivers the OET Test and related services to healthcare professionals. The OET Test is a high stakes English proficiency test that is administered in over 60 countries and recognised by healthcare boards and councils in Australia, Canada, New Zealand, the United Kingdom, the United States of America, Ireland, Dubai, Singapore and more. There are three forms of the OET Test: OET Test on Computer, OET@Home™ (remote-proctored) and OET Test on Paper.

Our service offering primarily relates to:

- ➔ OET Test delivery and administration
- ➔ OET Test preparation support

Our head office is in Victoria, Australia. As at the 31 July 2024, we have 201 employees globally, with 182 employees based in Australia. From time to time, via a services agreement Cambridge University Press & Assessment employs individuals to work within our operations internationally.

# Our supply chains

We have an extensive network of suppliers who assist us in providing the OET Test and related services worldwide.

Our supply arrangements are ongoing, on a fixed term, or ad hoc for a specific project or task.

## Test delivery partners

Test delivery partners are our largest supplier category.

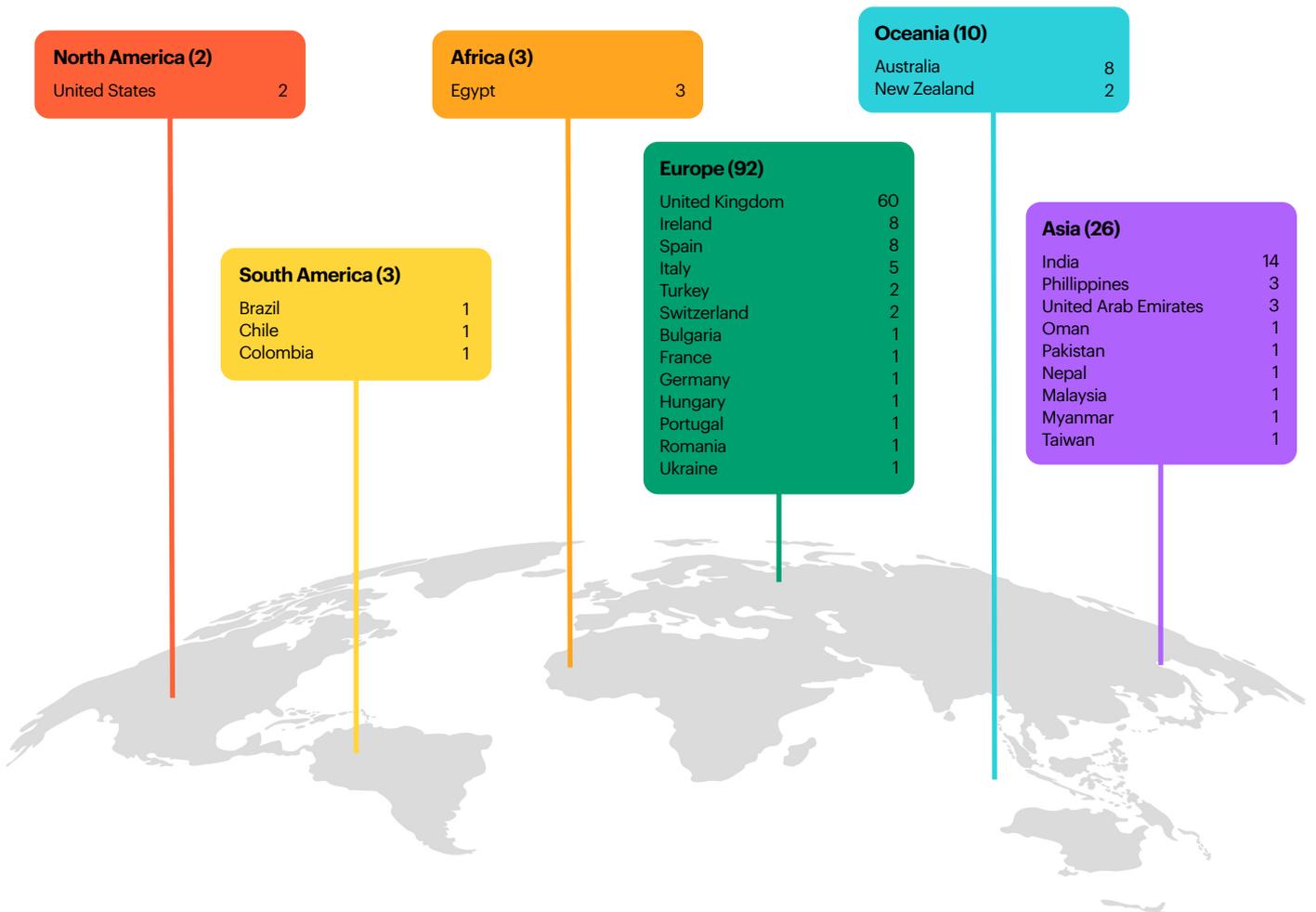
They provide venues for us to conduct the OET Test and help deliver the OET Test to candidates, including performing the operational processes required on OET Test days. Information on our test delivery partners can be found [here](#).



## Preparation partners

We have two types of preparation partners who assist candidates with preparing for the OET Test:

- 1 **Premium Preparation Partners**, who have successfully completed an OET teaching skills program and demonstrated high levels of quality in material creation and curriculum planning. We have endorsed them to offer courses with specific entry level requirements and course lengths that provide candidates with the required English language level and skills to reach their targeted OET Test score. They are permitted to display the OET Premium Preparation Partner logo.
- 2 **Preliminary Preparation Partners**, who have completed a preliminary OET training program. They have not completed the full OET teaching skills program but have indicated to us that they meet certain criteria expected of a reputable English language course.



## Other suppliers

We also have a range of suppliers who provide day-to-day goods and services to us, including office supplies, catering, cleaning and general office maintenance services, printing and scanning, software subscriptions and IT services, labour hire services, content preparation, marking and assessment, design services, brand protection services, and legal, taxation, accounting, audit and consultancy services.

# Risks of modern slavery practices

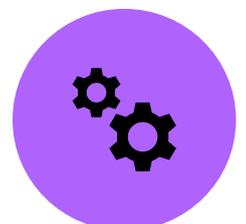
## Operations and supply chain

Our internal operations are primarily within Australia. Based on the key risk indicators for modern slavery, we believe the risks of modern slavery practices within our operations and in relation to our Australian-based suppliers are low.

There is also a low risk of modern slavery in relation to our local and overseas preparation partners because they are generally well-educated teachers who operate as sole traders or small businesses.

However, there are inherent modern slavery risks associated with a global supply chain, particularly given the countries in which our suppliers operate and their sectors. During the reporting year, no modern slavery risks have materialised in our supply chain or operations. However, we are actively enhancing our maturity in this area to strengthen our ability to manage modern slavery risks. While we have not identified any incidents of modern slavery, we recognise that we may be directly linked to the following risks of modern slavery practices due to our relationships with overseas suppliers:

- ➔ **Test delivery suppliers** – several of our test delivery partners operate in countries reported by the Global Slavery Index and international labour organisations to have a high prevalence of modern slavery and corruption and/or weak rule of law, including Saudi Arabia, Turkey, United Arab Emirates, Kuwait, India, Pakistan, Myanmar, Brunei, Greece and the Philippines. The sector also commonly uses temporary or unskilled labour and short-term contracts in providing services. These factors, together, indicate a modern slavery risk that we are mitigating by optimising our test delivery partner network, removing small, non-compliant, high-risk venues and continuing to prioritise our supplier due diligence program.
- ➔ **Labour hire** – labour hire providers often use temporary, overseas labour on short-term contracts. Our labour hire providers typically provide services remotely and from overseas, which means there is low visibility into the working conditions of the individuals performing the services.
- ➔ **Office supplies** – some of our office supplies are manufactured in countries reported to have a high risk of labour exploitation or typically involve the use of seasonal, temporary or unskilled labour.
- ➔ **Sub-suppliers** – our suppliers procure goods and services from other suppliers (i.e. sub-suppliers). At this stage, we do not know the identities and business practices of all sub-suppliers, which means there may be modern slavery risks associated with their businesses, as well as the businesses of suppliers further down the supply chain. However, we will seek to address this gap in our supplier due diligence program.



# Actions taken to assess and address risks

We are committed to doing business ethically and with integrity and have several controls in place to assess and address modern slavery risks that arise within our operations and supply chains. Below are the actions we have taken during the reporting period to assess and address the risks identified above:

- ➔ Standard contract templates
- ➔ Policies and procedures
- ➔ Risk management framework
- ➔ Venue optimisation
- ➔ New country entry due diligence
- ➔ Regular test delivery partner meetings
- ➔ Employee training

## Standard contract templates

Given the modern slavery risks we have identified are primarily associated with our supply chain, we have standard contract templates that we continue to endeavour to use with suppliers, including test delivery partners, printing and scanning providers, premium preparation partners and IT development suppliers. Those standard contracts contain several important clauses, including the following:

### Modern slavery

Our standard contracts with test delivery partners, premium preparation partners and other suppliers require them to:

- ➔ Comply with applicable modern slavery laws
- ➔ Maintain policies and procedures to ensure compliance with applicable modern slavery laws
- ➔ Agree to not utilise slave, prisoner, child or any other form of forced labour in providing services to us
- ➔ Notify us if they become aware of these forms of labour in their businesses or the businesses of their subcontractors

### Health and safety

Our standard contracts with test delivery partners contain comprehensive health and safety requirements.

Our Test Delivery Partner Manual supplements our test delivery contracts by prescribing certain test venue conditions and minimum staff training requirements.

### Audit rights and dispute resolution procedures

Our standard contracts with test delivery partners, premium preparation partners and other suppliers allow us to inspect and audit suppliers' premises or documents at any time, and our dispute resolution procedures allow us to engage with suppliers to resolve any concerns or disputes we have.

### Termination

We have broad rights to terminate a contract with a supplier.



## Policies and procedures

Our policies and procedures set out our high expectations in relation to the conduct of our employees and are designed to provide avenues for employees and suppliers to raise concerns about conduct that they observe.

<p><b><u>Code of Conduct</u></b></p>	<p>Our Code of Conduct was updated in FY24 and references modern slavery. In addition, our Code sets the standards of behaviour expected from employees. It requires employees to:</p> <ul style="list-style-type: none"> <li>➔ Ensure their professional and personal conduct is consistent with our values</li> <li>➔ Treat all people with respect and dignity and challenge any form of harassment, discrimination, intimidation, exploitation or abuse</li> <li>➔ Protect the health, safety and welfare of all employees, contractors and other stakeholders</li> <li>➔ Adhere to high business integrity standards and maintain high quality standards</li> <li>➔ Ensure our suppliers adhere to our contracts (which commonly contain modern slavery clauses)</li> <li>➔ Raise any serious concerns relating to their work, our organisation or the conduct of others</li> </ul> <p>The Code of Conduct is part of the onboarding process for all new employees, which includes annual compliance training, and any breach by an employee is considered a breach of their employment contract.</p>
<p><b>Procurement Policy &amp; Procedure (Non-public policy)</b></p>	<p>Sets out our procurement framework for new products and services, which employees and contractors must comply with. Some of the key objectives of the Procurement Policy &amp; Procedure which were updated in FY24 are to ensure probity, accountability and transparency in our procurement operations, and to reduce or mitigate the risks in our engagements with suppliers. It also requires any procurement decisions to consider economic, social and environmental impacts.</p>
<p><b><u>Anti-Bribery and Corruption Policy</u></b></p>	<p>Bribery and corruption are serious risks for doing business in Australia and around the world, where bribery and corruption is increasingly in the spotlight. The purpose of an Anti-Bribery and Corruption Policy is to clearly state CBLA's position on bribery and corruption, establish procedures and requirements to ensure compliance with all relevant laws and to ensure that CBLA conducts business in a lawfully and socially responsible manner. CBLA is committed to ensuring that it complies with all relevant legislation and will take action to ensure that compliance is embedded within our CBLA culture.</p>
<p><b><u>Whistleblower Policy</u></b></p>	<p>Provides a mechanism for all stakeholders (including employees and suppliers) to report concerns and outlines the protections we have in place to ensure employees can report concerns confidentially and without fear of intimidation, disadvantage or reprisal.</p> <p>Stakeholders have the option of reporting concerns through Stopline, an independent and confidential reporting service. Stopline also accommodates a number of languages, which is vital for our global business.</p>
<p><b>Staff Grievance Policy (Non-public policy)</b></p>	<p>Provides a mechanism for employees to raise grievances about the workplace or other employees, including any grievances involving health and safety. This policy aims to ensure grievances are handled in a fair and transparent manner, fostering a safe and inclusive work environment where employees feel safe and supported, without fear of vilification, victimisation or reprisal.</p>

---

## Risk management framework

The Risk Management Framework documents our approach to risk management for making business decisions. It sets out matters such as:

- ➔ Our risk tolerances for doing business, which include a zero tolerance for arrangements which breach ethical standards.
- ➔ How risks should be rated, documented and reviewed (including frequency of review).

During FY24, we continued to build maturity within our risk management process by:

- ➔ Implementing risk registers for each of the seven business functions. This has enabled us to identify control gaps and treatment plans to reduce our risk exposure to modern slavery.
- ➔ We have developed and implemented a value chain risk management approach that allows for greater insight into where in our value chain modern slavery risk exists.
- ➔ We have developed a Risk Library that recognises the following sustainability risks that apply to modern slavery risk, namely,
  - ➔ The risk that OET's reputation is damaged because of a failure to respond to current or emerging social risks, including salient human rights themes, faced by OET, by our candidates and in our supply chain.
  - ➔ The risk that OET fails to consider geopolitical risks across the jurisdictions in which it operates and / or delivers the test.
  - ➔ Potential for loss of reputation with current stakeholders due to operations in geographies with questionable or unpredictable governance, potential for unexpected taxes or levies, and threat to workforce safety where we have a local presence.
- ➔ Three key treatment plans have been identified through this process and are incorporated in the FY25 Modern Slavery action plans.
- ➔ The supplier due diligence program, which is underway, will inform the Third-Party Risk Management (TPRM) Framework, which is yet to be developed. However, the TPRM Framework remains a priority in future financial years and will align to the principles in the Risk Management Framework.

---

## New country entry due diligence

Before we decide to start operating in a new country, we undertake a standard due diligence process that documents the regulatory requirements and risks associated with entering into, and operating in, that country. This includes considering any sanctions or geographic or geopolitical risks relating to the country, which would include any geographic or sector modern slavery risks. If modern slavery risks are raised, we consider whether those risks can be adequately mitigated and, if so, how.

Maturing the capability approach around this process remains a focus going forward.

---

## Venue Optimisation program

Our Venue Optimisation program is a three-year program that started in FY24 and includes:

- ➔ Uplifting all contracts in our test delivery partner network to our standard contract template with appropriate focus on modern slavery risk. In FY24, we renegotiated 11 agreements to which we applied the appropriate modern slavery clauses.
- ➔ All new venues were onboarded with our standard contract agreements.
- ➔ We have removed small, non-compliant and high-risk venues. In FY24 we concluded this initiative with the closure of 42 venues.

---

## Regular test delivery partner meetings

We have regular meetings with test delivery partners to discuss operational performance, which includes staffing issues.

Those meetings provide a platform for any modern slavery-related concerns to be discussed and addressed.

---

## Employee training

Our employees must complete online mandatory compliance training yearly. Included in that training program are courses on anti-bribery and corruption.

We have implemented a Modern Slavery Policy, which has training associated with it as part of the annual compliance training program.

# Effectiveness of our actions

Our focus during the financial year was to continue developing our procurement and risk management frameworks to incorporate due diligence requirements for identifying and managing modern slavery risks present in our operations and supply chain.

---

## Enforcing contractual rights

We have strong relationships with our test delivery partners as our engagement with them provides significant opportunities for them to grow their businesses. For this reason, our contracts with test delivery partners have been effective in addressing any concerns we may have with their businesses or conduct. For example, we have rights to suspend their authority to administer the OET Test (and have previously done so) if we have reasonable cause to believe that they have materially failed to fulfil their obligations under the contract. The suspension process allows us to provide a recommended action plan and leverage our working relationship to help improve and effect change within their businesses.

---

## Audits

Our random audits of test delivery partners during the financial year also provided visibility into their businesses and helped us proactively identify any issues that may require remediation.

The independent audits are focused on test delivery rather than modern slavery, but we expect that the auditors would notify us of any modern slavery concerns identified during the audits.

---

## Policy reviews

To ensure our policies remain current and fit for purpose, we review them every three years or more frequently if there is a change in law or business strategy.

# Key achievements in the FY24 financial year

Action
Conducted regular Modern Slavery Working Group meetings throughout the year to deliver consistent progress on modern slavery action items.
Required all employees to complete modern slavery training available on our employee online training platform.
Conducted country/region level Risk Assessments including topics such as modern slavery.
Updated the Procurement Policy & Procedure and supplier on boarding process to expressly incorporate the Modern Slavery Policy, supplier questionnaire and modern slavery risks.
Developed a standard framework for including modern slavery clauses in supplier contracts where we are unable to use our standard contracts.
Through our standard contract template, embedded modern slavery clauses in all new test delivery partner contracts.
Implemented business unit level Risk Registers and a Value Chain Risk Management approach to ensure we identify and document key modern slavery risk at a business unit level across our value chain.

# Planned actions for the FY25 financial year

In FY25, we will continue to embed the modern slavery mitigations in our business and in our supply chain that we have developed over the last two years. We have developed an action plan for FY25 that is both cognisant of our need to embed and the need to improve our approach to modern slavery risk management.

Our measures are modest but ensure that we maintain our commitment to eliminate modern slavery from our operations and supply chain. We will measure our performance against this roadmap in the next modern slavery statement. The roadmap of actions will be regularly reported and reviewed by the CBLA Audit & Risk Committee and reported to the CBLA Board along with any future statement.

Action
Develop an enhanced due diligence program for countries/regions with a high/very high risk of modern slavery.
Renegotiate 103 test venue partner contracts based on our standard contract terms.
Uplift the Enterprise-wide Risk Management Framework with modern slavery risks identified at a process level (FY26).
Develop a Third-Party Risk Management Framework (FY26).

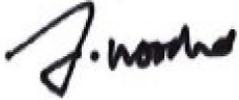
## Consultation with entities we own or control

---

OET Global Pty Ltd and OET USA, LLC had opportunities to provide input into the preparation of this modern slavery statement and did not require significant consultation as their operations are not independent to those of Cambridge Boxhill Language Assessment Pty Ltd.

# Approval

This modern slavery statement was approved by the Board of Directors of Cambridge Boxhill Language Assessment Pty Ltd ATF Cambridge Boxhill Language Assessment Unit Trust on 28 November 2024.



**Francesca Woodward**

Chair | On behalf of the Board of Directors of Cambridge Boxhill Language Assessment Pty Ltd ATF Cambridge Boxhill Language Assessment Unit Trust



**Jaime Cortes**

Chief Executive Officer

# Appendix

This Modern Slavery Statement was prepared in accordance with the criteria set out in the Modern Slavery Act 2018 (Cth). The table below outlines where information related to each mandatory reporting criteria can be located within the report.

Mandatory Criteria	Page
Identify the reporting entity.	3
Describe the reporting entity's structure, operations and supply chains.	4-7
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	8
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.	9-12
Describe how the reporting entity assesses the effectiveness of these actions.	13-14
Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls.	16
Any other information that the reporting entity, or the entity giving the statement, considers relevant.	15



**OET**  
**PO Box 16136 Collins St West**  
**Melbourne VIC 8007 Australia**

**[oet.com](http://oet.com)**