



# Modern Slavery Statement 2022

ONLINE EDUCATION SERVICES PTY LTD ACN 148 177 959 (OES)

## About this statement

This Modern Slavery Statement (**Statement**) has been prepared in line with the requirements of the Australian *Modern Slavery Act 2018 (Cth)* (**Act**). This Statement covers the activities of OES and its owned and controlled entities during the financial year ended 30 June 2022 (FY2022).

Previously, OES has jointly reported under the Act with its then parent, SEEK Limited. OES is producing this first standalone statement for FY2022.

## About OES

Online Education Services Pty Ltd (OES) is a company incorporated in Australia with its registered office and principal place of business at Level 1, 60 Cremorne Street, Cremorne, Victoria 3121, Australia.

OES is an online education enabler that provides a market-leading range of tailored solutions for online learning, partnering with universities, training institutes and professional bodies worldwide. OES was established in 2011 by SEEK Limited and Swinburne University of Technology to give people a chance to change their lives through online education. For over a decade, global partnerships have been formed to develop and enable immersive online, on-campus and blended learning experiences and solutions.

Modern slavery is an issue of global significance and OES recognizes that as a global citizen, it has a role to play in mitigating its impact. In FY2022, OES has built on its prior year modern slavery due diligence and is committed to further strengthening its initiatives in FY2023. We make this commitment even though our due diligence indicates exposure to modern slavery is limited.

## Structure and operations

### Our structure

OES is a private company limited by shares, incorporated under the laws of Australia. SEEK Limited held an 80% interest in OES up until 19 October 2021, when SEEK's interest was transferred to the SEEK Growth Nominees Pty Ltd.

OES has two significant wholly-owned and controlled entities domiciled in Australia and the United Kingdom: Gradability Pty Ltd (Gradability) and Proversity.org Limited (Construct Education).

During FY2022, OES acquired 100% of Gradability. Gradability delivers Australia's largest single employability program. Gradability provides online and in-person skills training for students and recent graduates directly relating to employability.

OES acquired a 58.6% interest in Construct Education in FY2021. Construct Education produces digital content for higher education and directly employs professional office-based employees in South Africa, the United Kingdom and the United States.

OES also has two small subsidiaries based in the UK, Online Education Services Limited (OES Ltd) and The Interactive Design Institute Limited (IDI), providing online education design services.

None of OES' controlled entities themselves meet the definition of modern slavery reporting entities.

### Our operations

OES provides online higher education courses and services to students in partnership with universities in Australia and the United Kingdom. OES employs more than 500 people, professional staff for office-based management and administration roles. OES also engages more than 400 active, part time sessional academic tutors. All employees of OES, including tutors are located in Australia. Employees of OES Ltd and IDI are located in the United Kingdom. Both countries have low inherent modern slavery risk.

OES has followed up on its commitment in FY21 to integrate Construct Education's modern slavery risk assessment into its own and is discussed separately in this document.

OES has sought to understand what modern slavery risk mitigation strategies that Construct Education and Gradability have in place. None of these entities meet the criteria to be considered a reporting entity by the Modern Slavery Act 2018, even if domiciled in Australia.

## **Our supply chain**

OES has worked with over 1,500 suppliers in FY2022. Inherent risk analysis was undertaken on the top 100 suppliers as measured by total spend. The top 100 suppliers made up 96% of the total spend.

## **Risk analysis methodology**

The risk analysis was based upon (i) country of supply, (ii) supplier industry and (iii) type of goods or service provided by that supplier. The methodology is simple and effective. For any of the 100 that initially identified as a moderate or high risk in any of the three categories, further desktop probing and internal enquiries were undertaken to ascertain whether there was in fact an elevated risk.

If there still remained an elevated risk, then a Modern Slavery Assessment questionnaire would be sent to the supplier.

The questionnaire relates to operations, particularly employment practices and the suppliers own supply chains. The questionnaire is in a Yes/No format, providing a score out of 12 (0 = no identifiable risk and 12 = maximum risk). There were no suppliers identified with any elevated risks that required the questionnaire being sent to the supplier.

One challenge with risk identification and mitigation is addressing risk in tier 2 and tier 3 suppliers. OES will be seeking to address this in FY2023 by introducing a supplier code of conduct and revised supplier contract terms.

## **Country of supply**

Of the 100 suppliers, only 13 suppliers were located outside Australia. Three of the 13 suppliers were located in moderate risk countries (Singapore and India) and all 13 suppliers were providing services considered 'low risk'.

## **Industry & type of goods/service**

OES's analysis of industry and type of goods/service identified three suppliers as having elevated risk of modern slavery within its supply chains: OES's office cleaning services and a computer supplier.

Cleaning services have an elevated risk of modern slavery as there is little transparency within the cleaning industry. This can result in employers taking advantage of workers, including withholding wages and providing dangerous and sub-standard working conditions. During FY2022, OES engaged a cleaning supplier to service its previous office. The office was closed due to COVID-19 restrictions for much of the time and cleaning services were limited.

In November 2022, OES moved its offices to co-locate with SEEK Limited at its headquarters in Cremorne, where OES shares SEEK Limited's cleaning services. SEEK Limited has already worked with this cleaning serviced supplier, which undertook an internal review of its own operations and supply chain in 2021. The review found no evidence of modern slavery practices and SEEK Limited received the full report and supporting attestations. The supplier has committed to ongoing monitoring to ensure modern slavery does not occur. OES is comfortable with this review, attestation and monitoring and will be updated by SEEK if any future issues arise.

The computer supplies purchased in Australia are sourced from an overseas supplier where there is less visibility and therefore a higher risk of modern slavery in the secondary levels of the supply chain. Our Australian based supplier of computer supplies has confirmed in its own modern slavery statement that it has engaged with its suppliers and has built a strong understanding of its suppliers' operations and supply chains. OES is comfortable with this assurance, considers the supplier's risk of modern slavery to be low and will continue to monitor the supplier.

## **Construct Education**

OES holds a 58.6% interest in Construct Education. Construct Education produces digital content for higher education. OES consulted with Construct Education to understand its modern slavery risks and mitigation process. OES considers the risks and mitigation processes to be effective, but is committed to continuous review and improvement.

Most of Construct's 174 employees are located in South Africa; others are located in the United States and United Kingdom. Given the nature of the business, other than temporary contractors, Construct does not have a supply chain of any note. Construct is compliant with local legislation that regulates aspects such as minimum wage, employment conditions and employee health & safety.

## **Gradability**

During FY2022 OES acquired 100% of Gradability. Gradability delivers Australia's largest single employability program. Gradability provides online and in-person skills training for students and recent graduates directly relating to employability.

OES consulted with Gradability to understand its modern slavery risks and mitigation process. OES considers the risks and mitigation processes to be effective, but is committed to continuous review and improvement.

Given the nature of the business, other than temporary contractors, Gradability does not have a supply chain of any note. Gradability engaged 8 full time professional staff on contract in Fiji on a trial basis. The contractors receive remuneration and benefits in excess of local Fijian award rates. All other employees are located in Australia.

## Governance and accountability framework

OES has in place corporate governance practices which are formally embodied in corporate governance policies and codes adopted by OES's Board of Directors. The aim of the policies is to ensure that OES is effectively directed and managed, that risks are identified, monitored and assessed, and appropriate disclosures are made.

OES's Audit and Risk Committee (**ARC**) assists the Board in fulfilling its corporate governance and oversight responsibilities in relation to OES's financial and non-financial risk management systems.

The Board of OES receives reports on the Modern Slavery risk and approves this Statement.

The Chief Executive Officer at OES is accountable for the modern slavery risk analysis, management and reporting.

## Policies and procedures

OES has a number of policies and procedures in place to ensure strong governance frameworks that enable OES to assess and address modern slavery risks. These include:

- **Code of Conduct** that sets out expectations for honest, ethical and accountable conduct standards by which all directors, employees, contractors of OES are required to abide;
- **Whistleblower Protection Policy** that supports and encourages employees, contractors and suppliers to raise concerns anonymously regarding improper behaviour at OES, including conduct relating to modern slavery; and
- **Anti-Bribery and Corruption Policy** that reinforces our commitment to high ethical and socially responsible standards in our procurement practices. Training on these core policies is mandatory for all employees both at induction and every two years.

## Assessing our effectiveness

As OES continues its journey to understand and mitigate the risks of modern slavery in our operations, including our supply chain, we are committed to reviewing the effectiveness of our actions by:

- annually reviewing OES's modern slavery risks and process to address risks; and

- keeping up with initiatives and practices engaged in by other reporting entities and considering if adoption would increase the effectiveness of OES’s modern slavery prevention practices.

## Commitment to continuous improvement

In FY2022, OES had undertaken a modern slavery risk analysis of its top suppliers and reviewed that risk analysis. OES proposes to review the risk management methodology in FY2023, as shown on the table below.

	FY2021	FY2022	FY2023
	Joint Statement with SEEK Ltd	Stand-alone Statement	Stand-alone Statement
<b>1. Risk analysis of top suppliers</b>	✓	✓	✓
a. Risk analysis of Top 100 contractors for OES	✓	✓	✓
b. Review what risk analysis/or equivalent steps the OES Subsidiaries are currently taking		✓	✓
c. Review risk management methodology for the OES Group to assess its effectiveness			✓
<b>2. Questionnaires/assessment for High Risk Companies</b>		✓	✓
a. OES - Includes cleaners/Top 100 Suppliers identified as High Risk		✓	✓
b. OES Subsidiaries - Includes cleaners/Top Suppliers identified as High Risk			✓
<b>3. Introduce Supplier Code of Conduct and commence rollout of revision to supplier contract terms for OES</b>			✓

## Consultation

The Modern Slavery Working Group, comprising representatives from the key business units including procurement and finance reviewed the policies, procedures, governance and reporting on modern slavery across the business.

During the reporting period, OES actively engaged with each of its owned and controlled entities on OES’s approach to modern slavery and the development of this statement.

The working group briefed key members of its Executive Team, including the Chief Finance Officer and the Executive Director Human Resources in preparation for this Statement. The Chief Growth Officer provided oversight of the modern slavery risk assessment.

The working group:

- maintained a modern slavery supplier risk assessment matrix;
- Identified the level of risk of modern slavery across OES’ network of suppliers;

- prepared a plan to implement modern slavery mitigation practices, such as a supplier code of conduct and amending supplier terms for new and existing suppliers

## Approval of the Modern Slavery Statement

This Statement was approved by the Board of OES and is signed by the Chairperson of OES on behalf of OES.

*Wendy Thorpe*

Chairperson

20 December 2022

## Mandatory criteria of this statement

Mandatory criteria	Reference in this Statement
1. Identify the reporting entity	About this statement: page 1
2. Describe the reporting entity's structure, operations and supply chains	About OES: page 1 Structure and operations: pages 2-4
3. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	Structure and operations: pages 2-4
4. 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	Structure and operations \ Risk Management Methodology: page 3
5. Describe how the reporting entity assesses the effectiveness of these actions	Assessing our effectiveness: page 5
6. Describe the process of consultation with any entities the reporting entity owns or controls, and	Consultation: page 6
7. Provide any other relevant information.	✓