



# Modern Slavery and Human Trafficking Statement FY23

Published: November 2023



# CONTENTS

<b>Message from Group CEO</b>	<b>4</b>
<b>Our structure, operations and supply chains</b>	<b>8</b>
<b>Modern slavery risks in our operations and supply chains</b>	<b>14</b>
<b>Our response to our modern slavery risks</b>	<b>18</b>
<b>Assessing the effectiveness of our actions</b>	<b>24</b>
<b>Consultation and approval</b>	<b>26</b>
<b>Appendices</b>	<b>28</b>

This Modern Slavery and Human Trafficking Statement is the fourth 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 2022 to 30 June 2023.

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".

<sup>1</sup> Registered address: Level 26, 101 Collins Street, Melbourne VIC 3000

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

<sup>3</sup> 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 lands 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 and recognise their connections to lands, seas, waterways, sky and Community. We pay our respects to Elders past and present.



# MESSAGE FROM GROUP CEO

At Navitas, we're thinking a lot about impact. We're considering the impact we have as an organisation – on the students we teach, the colleagues we employ and the partners and communities we serve.

We have developed an ESG (Environment Social Governance) strategy and framework to better understand, measure, and improve the impact we create in our changing world. Our approach is built around our impact as an employer, an educator and a global citizen, and is aligned to the United Nations' Sustainable Development Goals (SDGs).

In FY23, our equity partner BGH Capital worked with colleagues from across our operations to complete an ESG materiality assessment. Through this process, Navitas identified 12 material ESG topics, one of which is 'Human Rights and Modern Slavery'.

Our commitment is not only to comply with relevant laws but to go beyond, actively identifying and mitigating any potential risks associated with modern slavery within our supply chain, workforce, and partnerships.

Modern Slavery is a global issue that affects millions of people, often in hidden and complex ways. As an organisation, we are dedicated to preventing and eradicating this issue in all its forms, including forced labour and human trafficking, within our sphere of influence. As an education organisation, we can go one step further, and ensure that we are increasing awareness about Modern Slavery and Human Rights among our students through our onboarding processes and the delivery of our programs. We have an important role to play in creating a world where all individuals enjoy the dignity and rights they deserve.



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







# 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.



56,000  
students yearly



Operating in  
29 countries



5000  
employees



98 colleges and  
campuses across  
global network



Partnerships with  
38 universities



\$3million 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.

## Higher and Vocational 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 **GENUINE** in the way we behave and deliver



We are **ADVENTUROUS** in mind and spirit

We demonstrate **RIGOUR** in enhancing our professional reputation and credibility



We have **CONVICTION** to our purpose and potential

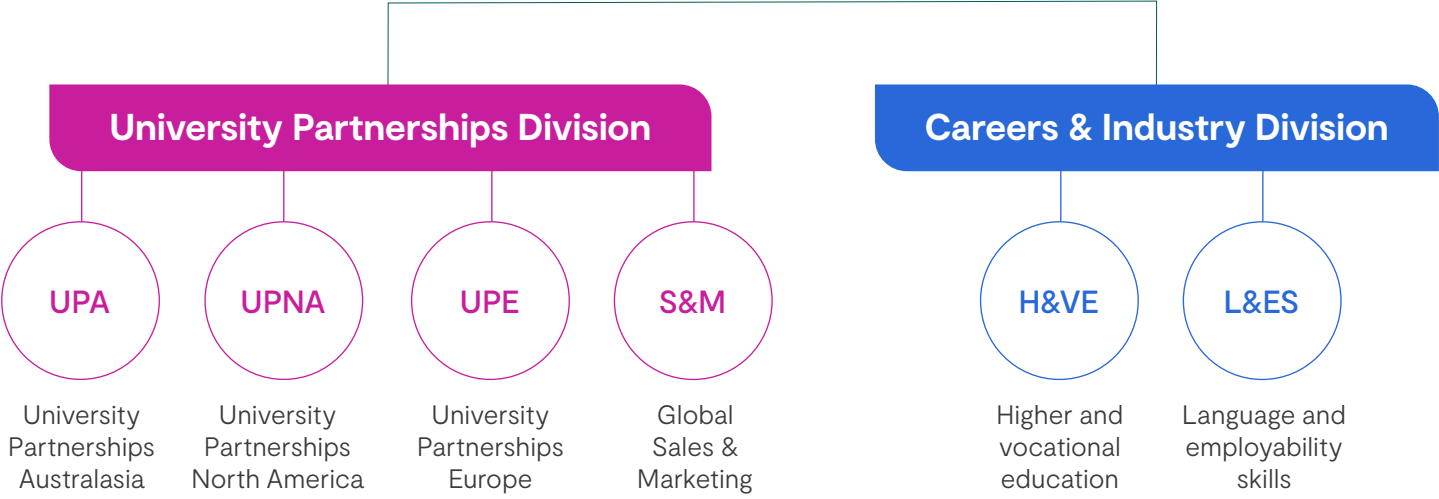


We show **RESPECT** by celebrating, valuing and caring for people and the environment

# **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 2022 – 30 June 2023.

### University Partnerships Australasia



### University Partnerships North America





## University Partnerships Europe



## Careers & Industry

The Navitas Careers & Industry division delivers higher education, vocational education and training, language, literacy, numeracy and employability skills programs and services 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.

## Higher and Vocational Education



## Language and Employability Skills



### Navitas Education Trust

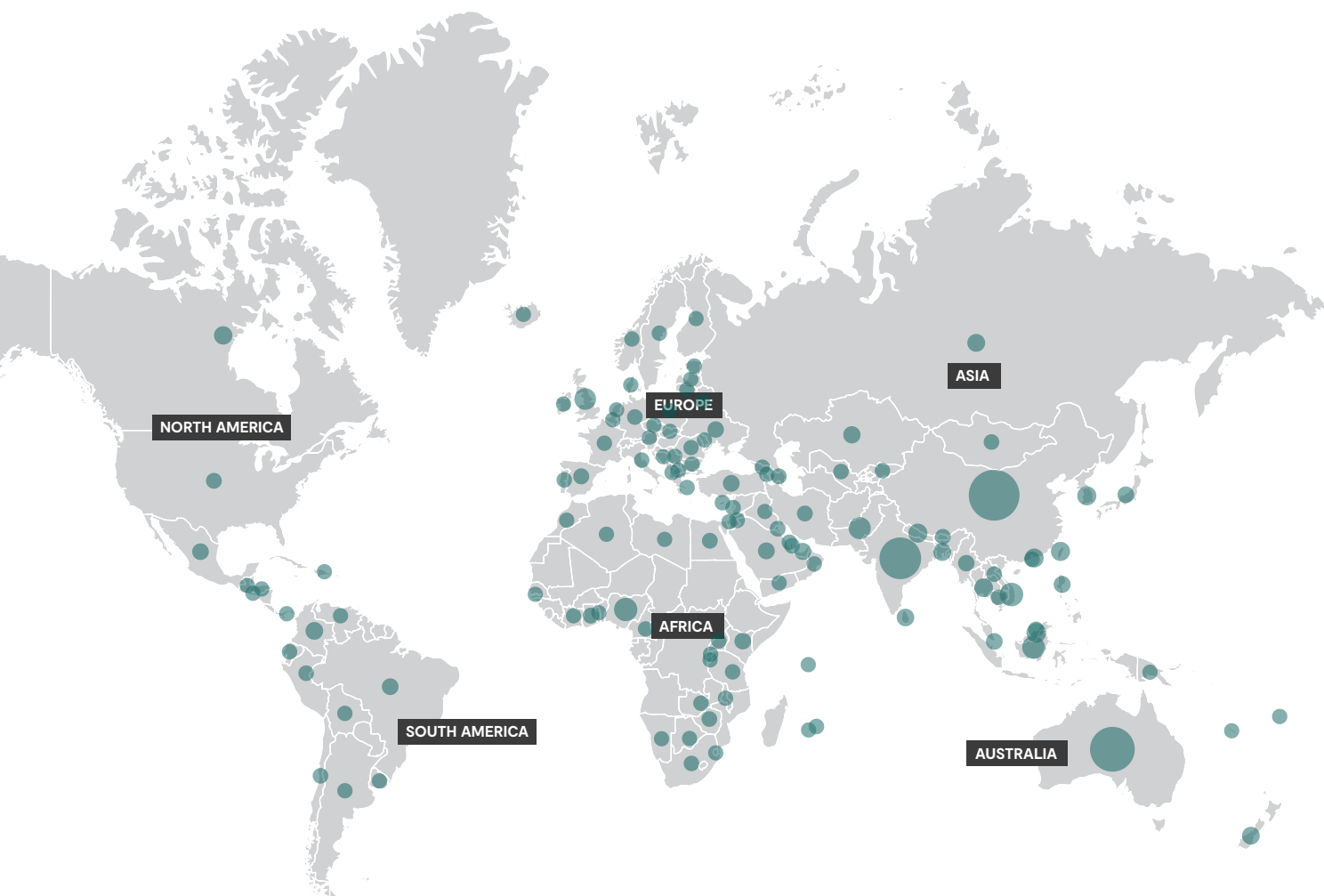
Our purpose of transforming lives through education extends beyond the experiences we offer to our students. The Navitas Education Trust (NET) provides support to development organisations with an education focus to bring about change where it is most needed.

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. We have about 2,300 contracted agents in 125 countries around the world.

## Navitas education agents by country



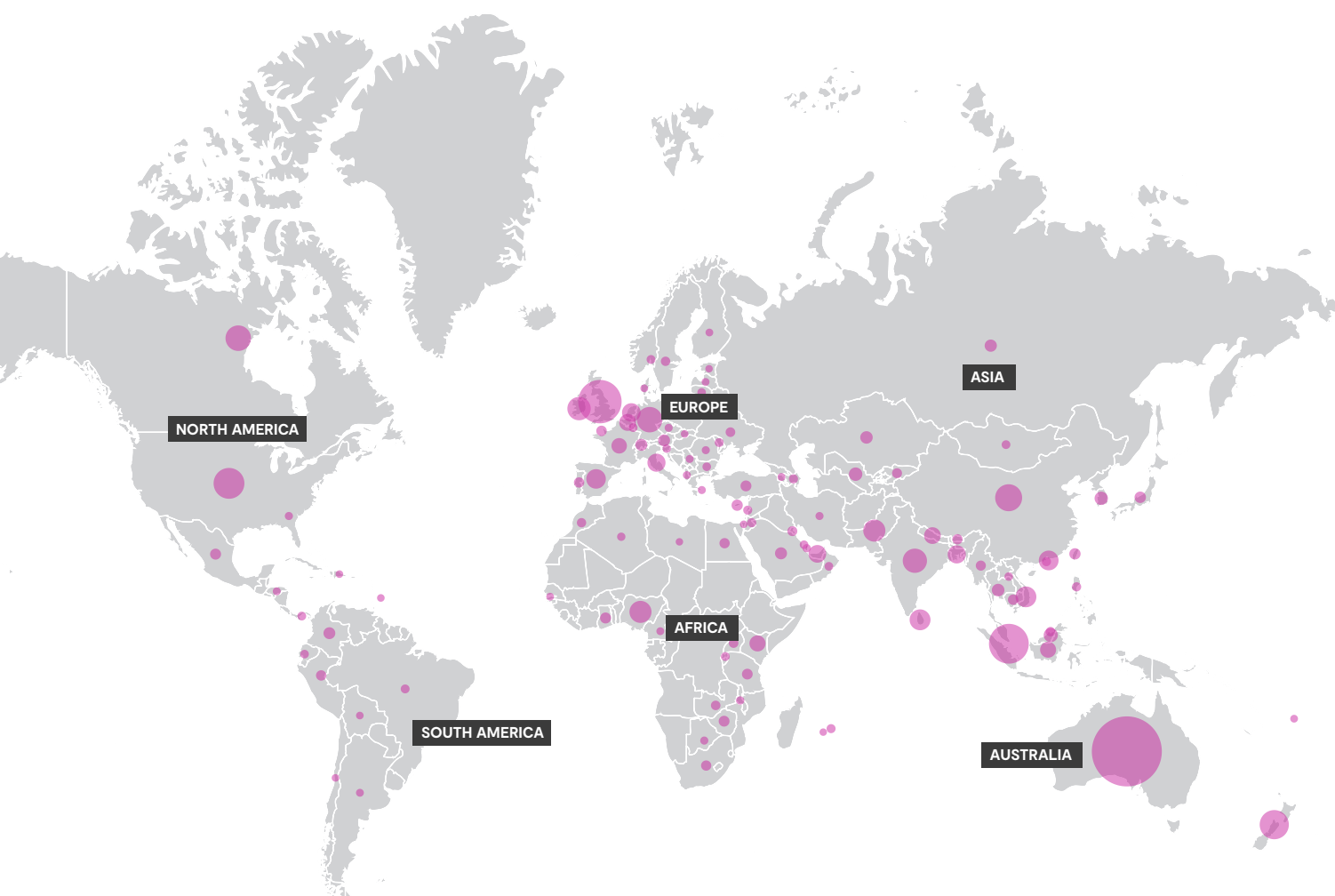


Other than expenditure on our educational agent commissions and incentive programs, analysis of our supply chain identified our procurement activity falls into one of seven categories:

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

Our businesses source from a range of locations with the largest volume of spend sourced from Australia, United States, 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 will be reviewing the risks in FY24. 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:

Cause	The risk that our operations directly result in modern slavery occurring (e.g. we use forced labour in our offices).
Contribute	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. (e.g. if our negotiations with suppliers to lower costs results in them using forced labour in their own operations or supply chain to meet our requirements).
Directly Linked	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. (e.g. 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

# Our operations



## 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 29 countries of which six<sup>4</sup> are considered to have a higher prevalence of modern slavery, as measured by the Global Slavery Index 2018. We therefore consider there to be a higher risk that our staff or contractors in these countries 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 charities we support through the NET and 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 FY23 the NET made grants totalling \$200k AUD to organisations delivering educational projects in Cambodia, Nepal, Indonesia and Zambia. Some of these countries are considered to have a high prevalence of modern slavery, as per the Global Slavery Index 2018.

<sup>4</sup> Pakistan, Thailand, Nigeria, Kenya, Malaysia and Turkey.



# Our supply chain

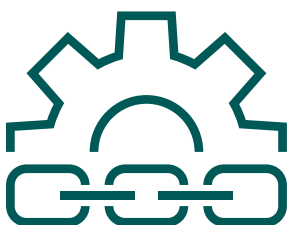


## EDUCATION AGENTS

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>5</sup>. Evidence suggests trafficking is sometimes facilitated using student, visitor/ tourist or working holiday visas<sup>6</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.



## 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 used to operate our business. Procurement of goods and services that utilize 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.

The impact of the COVID-19 pandemic on Navitas and the wider international education sector has resulted in an increased focus on cost management. Procuring goods and services at the lowest cost may contribute to 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, Navitas sources from 85 countries in total. Out of these, we work with 71 suppliers located in countries that are identified in the Global Slavery Index by Walk Free as 'most prevalent' countries for modern slavery.

### 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.

<sup>5</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>6</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.

## 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.

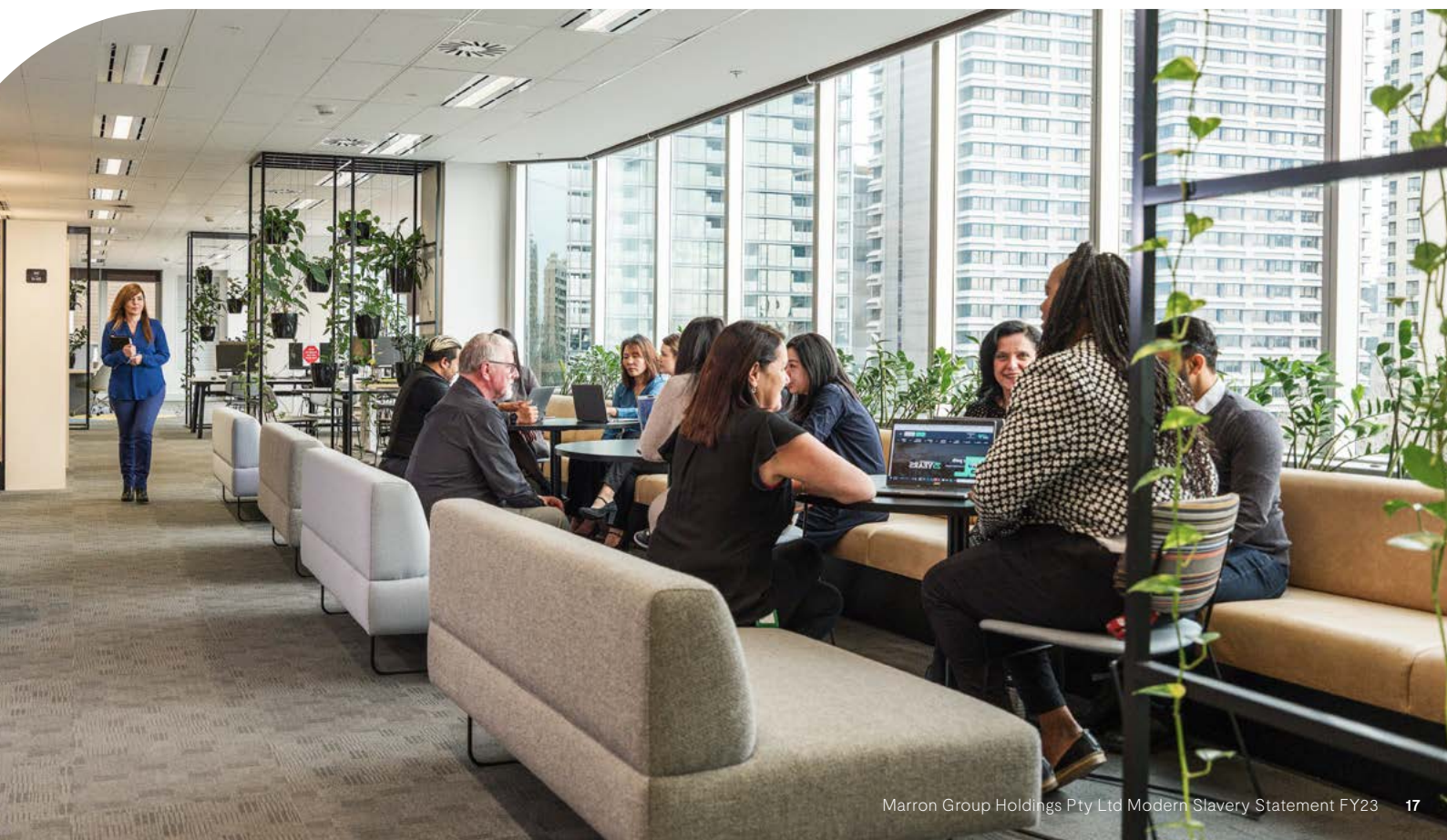
## Branded promotional goods including clothing

We procure a variety of promotional products such as hats, pens, t-shirts and bags to be used at student recruitment events. These products are typically sourced from companies in the countries where we have education institutions.

However, 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 such as 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.

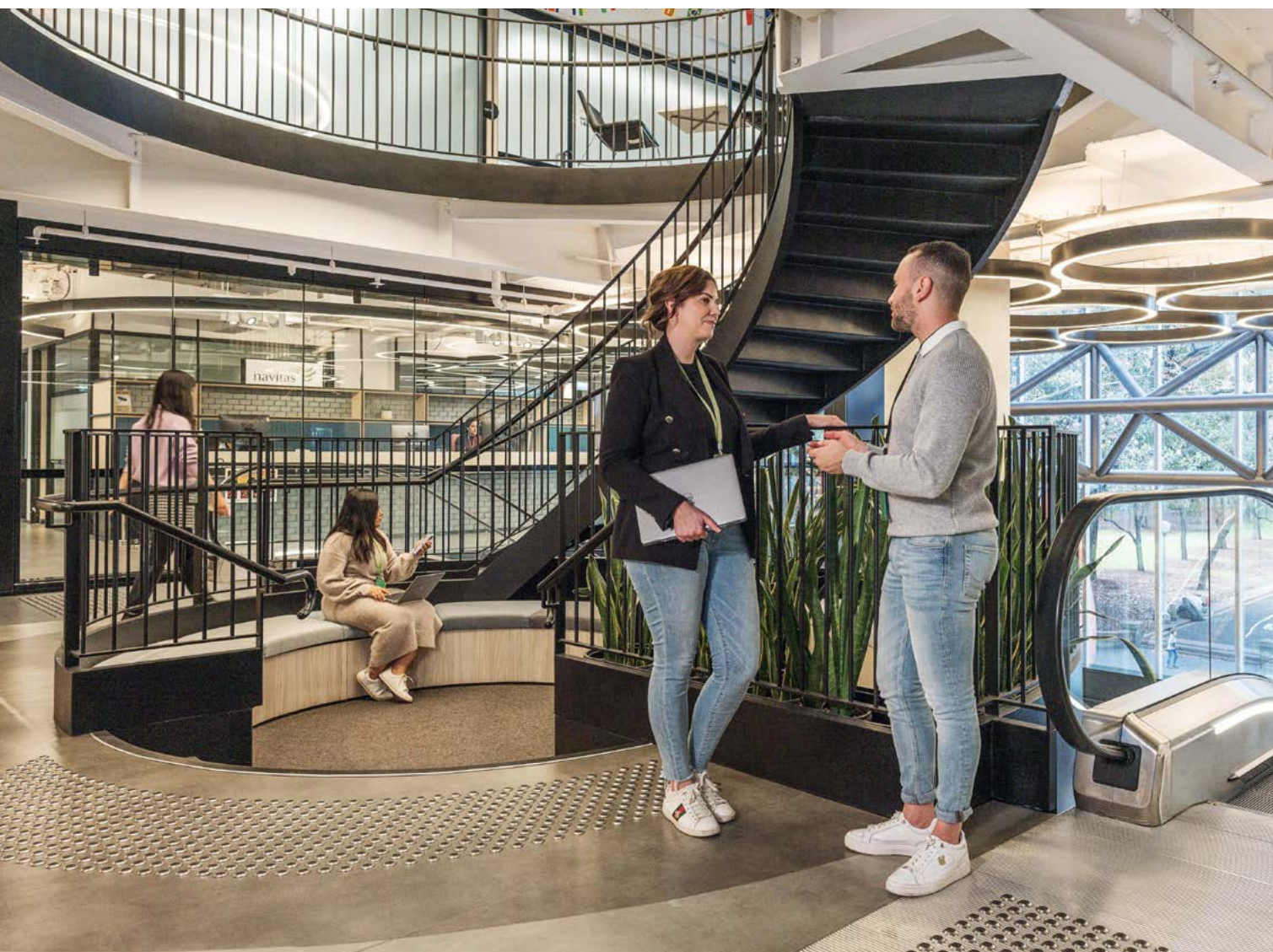
## Construction and fit out of new campuses

In FY23 we were involved in, or planning for, the construction and fit out of campuses in Australia, Sri Lanka, Germany and Singapore– some of which continued from FY22. The labour contract for our new campus construction in Sri Lanka included clauses on Modern Slavery to ensure that no form of forced, bonded, compulsory labour, slavery or human trafficking was performed. 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.



# **OUR RESPONSE TO OUR MODERN SLAVERY RISKS**





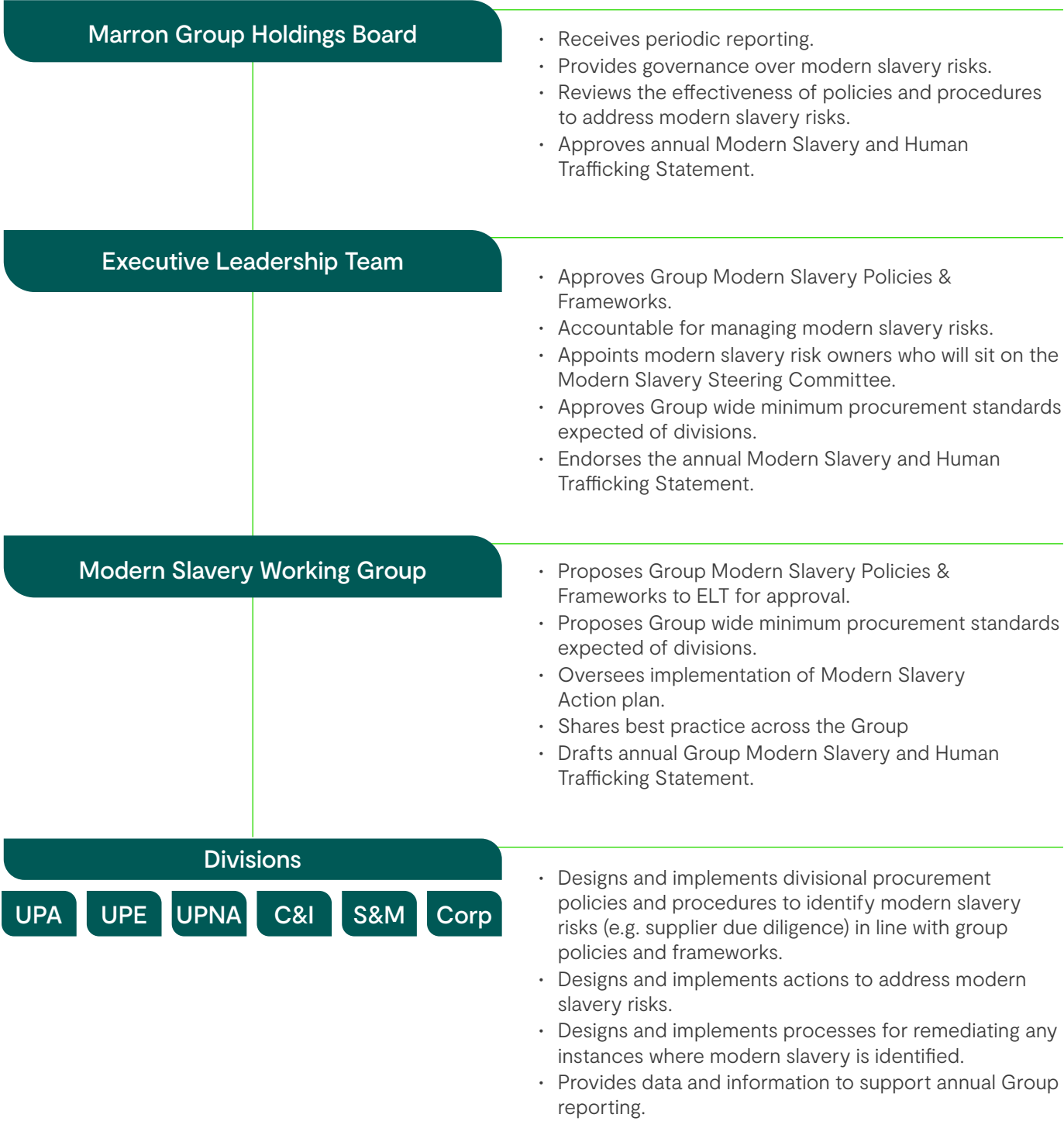
All entities owned and controlled by Navitas operate in the education sector, have similar supplier profiles and have been assessed as having the same risks of modern slavery in their supply chain. As a result, actions taken to address our identified modern slavery risks apply to all Navitas owned and controlled entities.

## Governance and policy

In FY23, our equity partner BGH Capital conducted a Modern Slavery maturity assessment in which Navitas was assessed against nine areas as shown in the image on the left. We stand 'Best-in-class' in one area and 'Established' in four out of nine areas. We are 'Developing' in the remaining areas except for 'Monitoring progress and effectiveness' wherein we are 'Basic/ ad hoc'. The findings and recommendations from this assessment are informing our approach to addressing the identified Modern Slavery risk within our business.

Criteria #	Criteria	Maturity assessed
1	Commitment	3 - Established
2	Policies	4 - Best in class
3	Governance and management	3 - Established
4	Identify and assess	3 - Established
5	Address modern slavery risks	2 - Developing
6	Respond and remediate	2 - Developing
7	Collaboration	2 - Developing
8	Monitoring progress and effectiveness	1 - Basic / ad hoc
9	External communication	3 - Established

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 appointment of an ESG director to the Executive Leadership Team in FY23 has also 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.







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.

<b>Values in Action (Code of Conduct)</b>	<p>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.</p> <p>It includes how to report non-compliant, illegal, or unethical behaviour or actions via our <a href="#">Speak Up portal</a>.</p>
<b>Whistleblowing Policy</b>	<p>Defines reportable conduct and provides details of how people can report such conduct including via our Speak Up portal (see above).</p>
<b>Environmental, Social and Governance (ESG) Policy</b>	<p>Outlines our environmental, social, and corporate governance principles, including:</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• Upholding freedom of association and the effective recognition of the right to collective bargaining.</li> <li>• 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.</li> </ul> <p>All employees are required to take these principles into account in their decision making.</p>
<b>Group Delegations of Authority</b>	<p>The Group Delegations of Authority embeds the requirement for all staff to take ESG principles into account when exercising delegated authority.</p>
<b>Modern Slavery and Human Trafficking Policy</b>	<p>Sets out minimum standards expected of our divisions to address the risk of modern slavery and human trafficking in their operations or supply chains.</p>
<b>Group Procurement Policy</b>	<p>Outlines Navitas requirements for the procurement of goods and services. This includes:</p> <ul style="list-style-type: none"> <li>• requirements that goods and services are sourced in a socially and ethically responsible manner.</li> <li>• expectations for due diligence and the minimum standards we expect our suppliers to meet.</li> <li>• Requirements for ongoing monitoring of suppliers and reporting of concerns.</li> </ul>



# Action taken in FY23 to mitigate identified risks

## Our operations



### **RISK AREA #1** **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.

The HR management system implemented in FY22 has provided better visibility of employment arrangements within our recruitment countries.

During FY23 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)).

#### **LOOKING AHEAD**

We will be working towards increasing awareness about Modern Slavery risks, and the reporting tools we have available (mailbox and whistleblowing platform). We will be rolling out mandatory staff training for Modern Slavery risks' awareness in our operations and supply chain in November 2023.



### **RISK AREA #2** **Navitas Education Trust**

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 #3 Our education agents

### ACTION TAKEN

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

Modern slavery clauses have been included within our agent agreements.

In May 2023, we mapped modern slavery risks against the student life cycle in order to identify key points or 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.

In FY23 we also initiated a quarterly agent monitoring report considering risk indicators such as the non-enrolment of a student.

### LOOKING AHEAD

In FY24 we will:

1. Further strengthen our agent monitoring systems and identify thresholds for further investigation
2. Roll out Modern Slavery awareness training for employees in recruitment markets
3. Improve agent awareness of modern slavery and human trafficking risks and how they may inadvertently contribute to modern slavery and human trafficking.
4. Provide students with information about modern slavery and human trafficking, including where they can access information and support.



## RISK AREA #4 Operational Goods and Services

### ACTION TAKEN

We have undertaken an exercise to cleanse our supplier data which will allow a more detailed analysis of our supply chain to be conducted.

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.

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

### LOOKING AHEAD

Tools will be developed to help staff assess the risk of modern slavery practices in the goods or services to be procured. Enhanced due diligence will be required before engaging 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.

# **ASSESSING THE EFFECTIVENESS OF OUR ACTIONS**







During this reporting period our focus has been on embedding our governance mechanisms, policies, and frameworks for the management of modern slavery risk across our operations and cleansing our supplier data to allow better analysis and understanding of our supply chains.

At this stage we are unable to adequately assess the effectiveness of measures we have taken. 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
Accountability for modern slavery issues, with an identified risk owner	A risk owner has been identified for addressing modern slavery issues in operations and supplier chains.
Policies	Policies and procedures have been implemented to manage the risk of modern slavery.
Supply chain mapping and risk assessment	Supply chains have been mapped and understood. The risk of modern slavery in operations and supply chains has been assessed.
On-boarding and contracting	Due diligence is performed on new suppliers to determine their risk level in relation to modern slavery. Contracts contain appropriate modern slavery clauses.
Audit and compliance program	Supplier performance is monitored to confirm ongoing compliance.
Training	Team members receive adequate training in relation to modern slavery and any supporting processes applicable to their role.
Complaints mechanism	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.
Remediation	Processes are in place to support suppliers to remediate breaches of the minimum standards.
Stakeholder engagement	Approaches to stakeholder engagement are in place.
Review	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 (KPI's) to measure the effectiveness of the actions taken to identify and address modern slavery practices in our operations and supply chains.

In FY23, we received two reports from whistleblowers. Neither 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.



# **CONSULTATION AND APPROVAL**



## Consultation

In preparing this Modern Slavery and Human Trafficking Statement, Navitas has consulted with 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, the NET Manager and Divisional Modern Slavery Risk Owners.

## Approval

This Modern Slavery and Human Trafficking Statement was approved by the Board of Directors of MGH on 26 October 2023.

**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 ACN 117 527 143	Not applicable	Australia
IBT Education Pty Ltd	Not applicable	Australia
IBT (Sydney) Pty Ltd	Not applicable	Australia
Learning Information Systems Pty Limited	Studylink	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

Entity Name	Trading Name(s)	Location
Navitas Skilled Futures Pty Ltd	Navitas Skilled Futures	Australia
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* ACN 087 590 010	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	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	Australian School of Applied Management Women and Leadership Australia Women & Leadership International Women & Leadership New Zealand The National Excellence in School Leadership Initiative	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 Eduservices Private Limited	Not applicable	India
Anuvac Confab Worldwide Private Limited	Not applicable	India



Entity Name	Trading Name(s)	Location
Ausedken Limited	Not applicable	Kenya
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	Not applicable	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
Learning Information Systems Limited	Studylink	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	Not applicable	United Kingdom
SC170551 Limited	Not applicable	United Kingdom
SC255447 Limited	Not applicable	United Kingdom

Entity Name	Trading Name(s)	Location
UA 92 Global Limited	UA 92 Global	United Kingdom
Women and Leadership International (UK) Limited	Not applicable	United Kingdom
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 Durham 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 Moscow LLC	Not applicable	United States of America
Navitas New York LLC	Queens College Global Student Success Program	United States of America
Navitas Boca Raton LLC	Not applicable	United States of America
Navitas Lowell LLC	Not applicable	United States of America
Navitas Dartmouth LLC	Not applicable	United States of America
Navitas Richmond LLC	Not applicable	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
International College of Lethbridge Calgary Limited	Not applicable	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	18
Describe how the reporting entity assesses the effectiveness of these actions.	Assessing the effectiveness of our actions	24
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	26
Any other information that the reporting entity, or the entity giving the statement, considers relevant.	About Navitas	6



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