

# *Modern Slavery Policy*

Version: 1.0





POLICY NAME	Modern Slavery Policy
POLICY MANAGER	Company Secretary
APPROVAL AUTHORITY	Board
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Contents

1. Introduction ..... 3

1) Purpose ..... 3

2) Scope ..... 3

3) What is modern slavery? ..... 3

4) Principles ..... 4

2. Policy ..... 4

1) NextEd’s approach to address modern slavery risks ..... 4

2) Reporting mechanisms..... 5

3. Reference and Supporting Information ..... 6

1) Relevant legislation..... 6

2) Supporting policies..... 6

3) Change History..... 6



# 1. Introduction

## 1) Purpose

This policy underpins NextEd Group Limited's commitment to combat modern slavery throughout our operations and supply chains, reflecting our core values of integrity, accountability, and respect for human rights. It aligns with our corporate responsibility to adhere to ethical practices as stipulated by the Modern Slavery Act 2018 and supports our strategic vision of maintaining transparent and responsible business practices.

## 2) Scope

This policy is an overarching Group policy and applies to:

- i) All employees and officers of NextEd Group Limited (NextEd) including employees and contractors;
- ii) All suppliers and business partners of NextEd;
- iii) All contractors and other business entities associated with NextEd;
- iv) All employees and officers (domestic and international) of NextEd brands:
  - a. Academy of Interactive Technology Pty Ltd (also trading as Coder Academy Australia, and ISCD) RTO: 90511, Registered Higher Education Provider PRV12005, CRICOS: 02155J
  - b. International School of Colour and Design Pty Ltd (iscd) RTO: 91439
  - c. Greenwich College Pty Ltd (also trading as Greenwich English College, Greenwich Management College, Greenwich Hospitality College) RTO: 91153, CRICOS: 02672K
  - d. Brisbane Career College Pty Ltd (trading as SERO Institute) RTO: 32303, CRICOS: 03528K
  - e. Capital Training Institute Pty Ltd RTO: 88145, CRICOS: 0399B
  - f. Celtic Training Pty Ltd RTO: 40179

## 3) What is modern slavery?

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

Modern slavery is a criminal offence and is defined in the Modern Slavery Act as including:

- trafficking of persons;
- slavery;
- servitude;
- forced marriage;
- forced labour;
- debt bondage;
- deceptive recruiting for labour or services; or
- child labour in situations where children are subjected to slavery or similar practices or are engaged in hazardous work.

<sup>1</sup> Attorney General's Dept [www.ag.gov.au/crime/modernslavery](http://www.ag.gov.au/crime/modernslavery).

<sup>1</sup> Divisions 270 and 271 of the Commonwealth Criminal Code.



## 4) Principles

NextEd is committed to the following principles:

- Acting ethically and with integrity in all its operations, business dealings and supplier relationships.
- It seeks to implement and maintain effective systems and controls to ensure that modern slavery is not occurring anywhere within its own business operations or in its supply chains.
- It is committed to ensuring there is transparency in its approach to addressing modern slavery throughout its business and supply chains in a manner consistent with its disclosure obligations under the Modern Slavery Act 2018 (Cth) (the Modern Slavery Act).
- It understands that prevention, detection and reporting of any modern slavery and human trafficking in any part of the organisation is the responsibility of all those working for it or under its control.

# 2. Policy

## 1) NextEd's approach to address modern slavery risks

NextEd acknowledges that addressing modern slavery requires a whole of organisation response that addresses each of the following areas.

- Our organisation's operations and culture
- Collaboration with suppliers and other stakeholders
- Systems and processes
- People and management
- Governance and oversight
- Reporting, review and remediation as required

### Awareness raising and training

Employees and students at NextEd Group Limited will receive training and informational resources designed to enhance their awareness of the root causes and consequences of modern slavery. This includes detailed insights into our Modern Slavery Policy and the strategies we implement to manage and reduce the risks of modern slavery in our operations and supply chains. Additionally, key personnel engaged in procurement will undergo specialised training on understanding and applying our modern slavery policy, managing supplier relationships effectively under these guidelines, and utilising tools and processes for conducting thorough due diligence with our suppliers.

### Governance

NextEd has in place robust governance and compliance frameworks, policies and procedures including:

1. Whistleblower Policy;
2. Annual Corporate Governance Statement;
3. Discrimination, Bullying and Harassment Policy;
4. Fraud and Corruption Policy; and
5. Employee Code of Conduct.

NextEd also has a comprehensive Agent Management Framework to provide guidance to its staff and



agents in relation to compliance and best practice.

### **Modern Slavery Steering Committee**

NextEd has established a Modern Slavery Steering Committee comprising:

- CEO
- CFO
- Exec GM Quality, Accreditation & Compliance

The Committee will report to the Audit & Risk Committee of the Board of Directors of NextEd periodically. The Committee will be supported by a working group including appropriate representatives from support function and business units as appropriate from time to time.

The committee's functions will include:

- Risk review and analysis on higher risk areas in our supply chain, including education agents in higher risk countries and any goods sourced from higher risk countries, with mitigation where appropriate.
- Issuing modern slavery statements to higher risk suppliers.
- Review of education agent and supplier contracts, ensuring appropriate modern slavery provisions that comply with the Modern Slavery Act 2018. See 'Supplier Code of Conduct' below.
- Review of relevant manuals and training materials for the inclusion of appropriate modern slavery information.
- Preparation and approval of a Modern Slavery Statement that outlines NextEd's activities to support its commitment to zero tolerance of modern slavery and human trafficking. This will be prepared for each financial year in which the company's revenue meets or exceeds \$100 million.

### **Code of Conduct**

Consistent with our principles, all employees, as well as members of the Board and its committees who are not employees, must adhere to NextEd's Code of Conduct. This code outlines our core values and expected standards of behaviour, which include compliance with all relevant laws, respect for human rights, and conducting oneself honestly and with integrity. Non-compliance with these standards may lead to an investigation under the misconduct terms specified in the Code of Conduct and relevant employee contracts.

### **Supplier Code of Conduct**

We adhere to the highest standards of excellence, ethical behaviour, and engagement, and we expect our suppliers to uphold these same principles throughout their supply chains. To this end, we require our suppliers to ensure that their employees, affiliates, their own suppliers, and subcontractors are informed about, understand, and comply with our Modern Slavery Policy and the Modern Slavery Act 2018. Additionally, our suppliers are expected to take appropriate actions to address any breaches of the Act, including those committed by their workforce or partners. Suppliers must also cooperate with us in carrying out third-party audits, due diligence assessments, or investigations to verify compliance with the Act.

## **2) Reporting mechanisms**

NextEd understands that prevention, detection and reporting of any modern slavery and human trafficking in any part of the organisation is the responsibility of its people. Employees and contractors are encouraged to report any concerns about likely breaches within the organisation or its supply chain to the:

- Group Quality, Accreditation & Compliance Manager (email [eve.ollerenshaw@nexted.com.au](mailto:eve.ollerenshaw@nexted.com.au)); or



- to a member of the NextEd Senior Executive Team.

## 3. Reference and Supporting Information

### 1) Relevant legislation

Modern Slavery Act 2018

### 2) Supporting policies

Document name	Document type	Location
Whistleblower Policy	Group Policy	Website
Annual Modern Slavery Statement	Annual statement	Website
Discrimination, Bullying and Harassment Policy	Group Policy	Website
Fraud and Corruption Policy	Group Policy	Website
Employee Code of Conduct	Group Policy	Website

### 3) Change History

Version	Approval date	Approved by	Change
V1.0	1 February 2024	Company Secretary	Development of new Modern Slavery Policy
		Board	