



navitas

Modern Slavery and Human Trafficking Statement FY22

Published: November 2022

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This Modern Slavery and Human Trafficking Statement is the third 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 2021 to 30 June 2022.

MGH is a privately held company registered in Australia¹. MGH is the ultimate parent company of the Navitas Group, including the entities² listed in Appendix A³. In this report we are referring to these entities collectively as "Navitas", "we" or "us".

¹ Registered address: Level 26, 101 Collins Street, Melbourne VIC 3000

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

³ 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 Custodians
of the lands on which
we operate and pay our
respects to their Elders
past and present,



Message from Group CEO

The process of compiling our first two Modern Slavery and Human Trafficking Statements has improved our awareness and understanding of the complex issues relating to modern slavery, human trafficking, forced labour and human rights abuses.

For many of us, the concept of modern slavery seemed far removed from the education sector and the Navitas purpose of transforming lives through education, but over the past 24 months we have come to terms with the uncomfortable truth that no sector is immune to this problem.

At Navitas, we are taking our obligations in this area seriously. At every level of our organisation we are more aware of the risks and the actions we need to take to mitigate them. During FY20, as reported in our first Modern Slavery and Human Trafficking Statement, we identified four primary risks in our operations. During FY21, we focused on building a strong governance and policy framework to hold ourselves and our suppliers to account. In FY22 we have built on these foundations, taking action in each of our identified areas to reduce risk within our organisation.

We will continue to raise awareness about modern slavery, invest in resources, and establish accountability throughout our own operations, our supply chain, our education agent community and the Navitas Education Trust to ensure that no person connected to Navitas is subject to behaviour or threats that may amount to modern slavery, human trafficking, forced labour or similar human rights abuses.



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.



70,000
students



More than **120 colleges** and campuses across global network



Operating in
33 countries



Partnerships with more than **30 universities**



5,500
employees



Over **\$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 **ADVENTUROUS** in mind and spirit



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



We are **GENUINE** in the way we behave and deliver



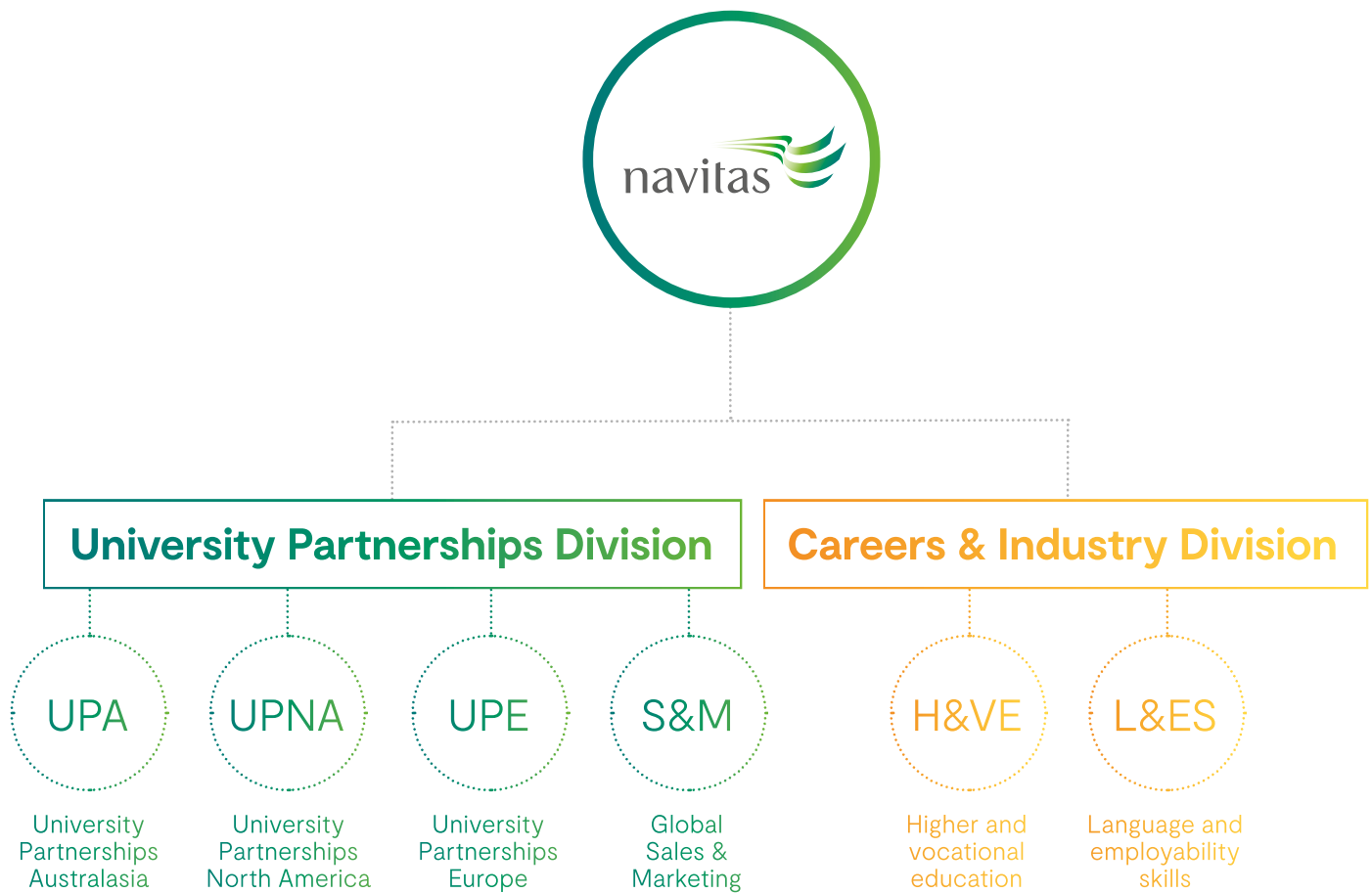
We demonstrate **RIGOUR** in enhancing our professional reputation and credibility



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 2021 – 30 June 2022.

University Partnerships Australasia

Australia



New Zealand



Sri Lanka



Dubai



Singapore



University Partnerships North America

Canada



United States of America



United Kingdom



The Netherlands



Germany



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

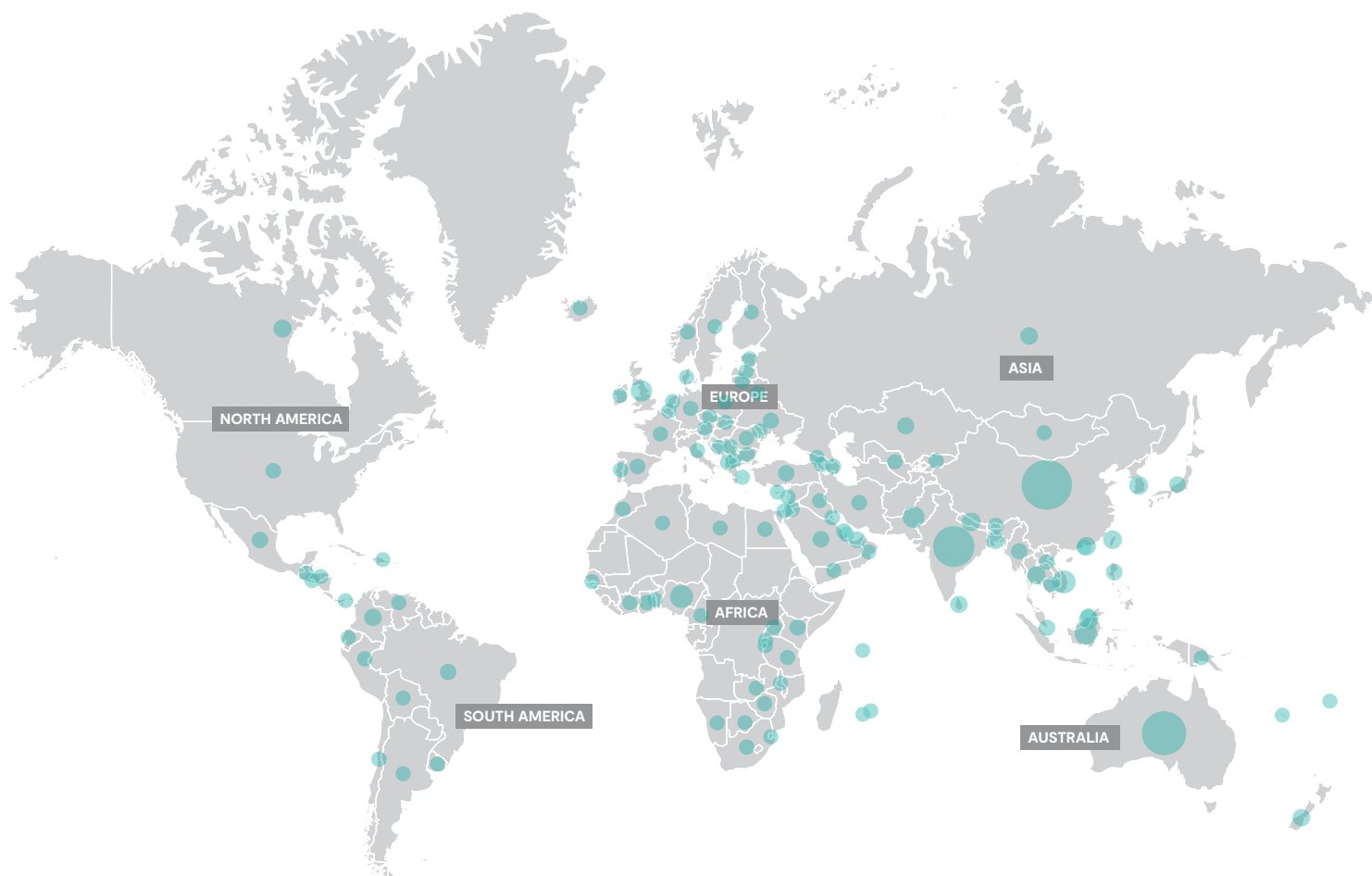
In addition to our commercial operations, the Navitas Education Trust (NET) was established in 2013 to support charitable organisations and activities with an education focus. Since 2014, the NET has made grants of almost \$3million to help numerous not-for-profit organisations deliver positive educational outcomes around the world.

For more information about the Navitas Education Trust please refer to our website navitas.com/who-we-are/navitas-education-trust

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 5,000 contracted agents in 122 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 reassessed 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 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 5,500 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 operates across 33 countries of which six⁴ 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 directly linked to modern slavery practices.

In FY22 the NET made grants totalling \$277k AUD to organisations delivering educational projects in Cambodia, Nepal, India, Indonesia and Kenya. Cambodia and Kenya are considered to have a high prevalence of modern slavery, as measured by the Global Slavery Index 2018.

⁴ 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 80% 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 labour⁵. Evidence suggests trafficking is often facilitated using student, visitor/tourist or working holiday visas⁶.

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 directly 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 62 countries and we work with 25 suppliers located in countries within the Global Slavery Index 2018 top 50 for prevalence of 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.

⁵ International Organisation for Migration and the Minderoo Foundation Walk Free Initiative (2019) Migrants and their vulnerability to human trafficking, modern slavery and forced labour

⁶ 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 our main operating countries (Australia, UK, US, Canada, Germany and the UAE).

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 FY22 we were involved in, or planning for, the construction and fit out of new campuses in Australia, Sri Lanka, Germany and Singapore. 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.

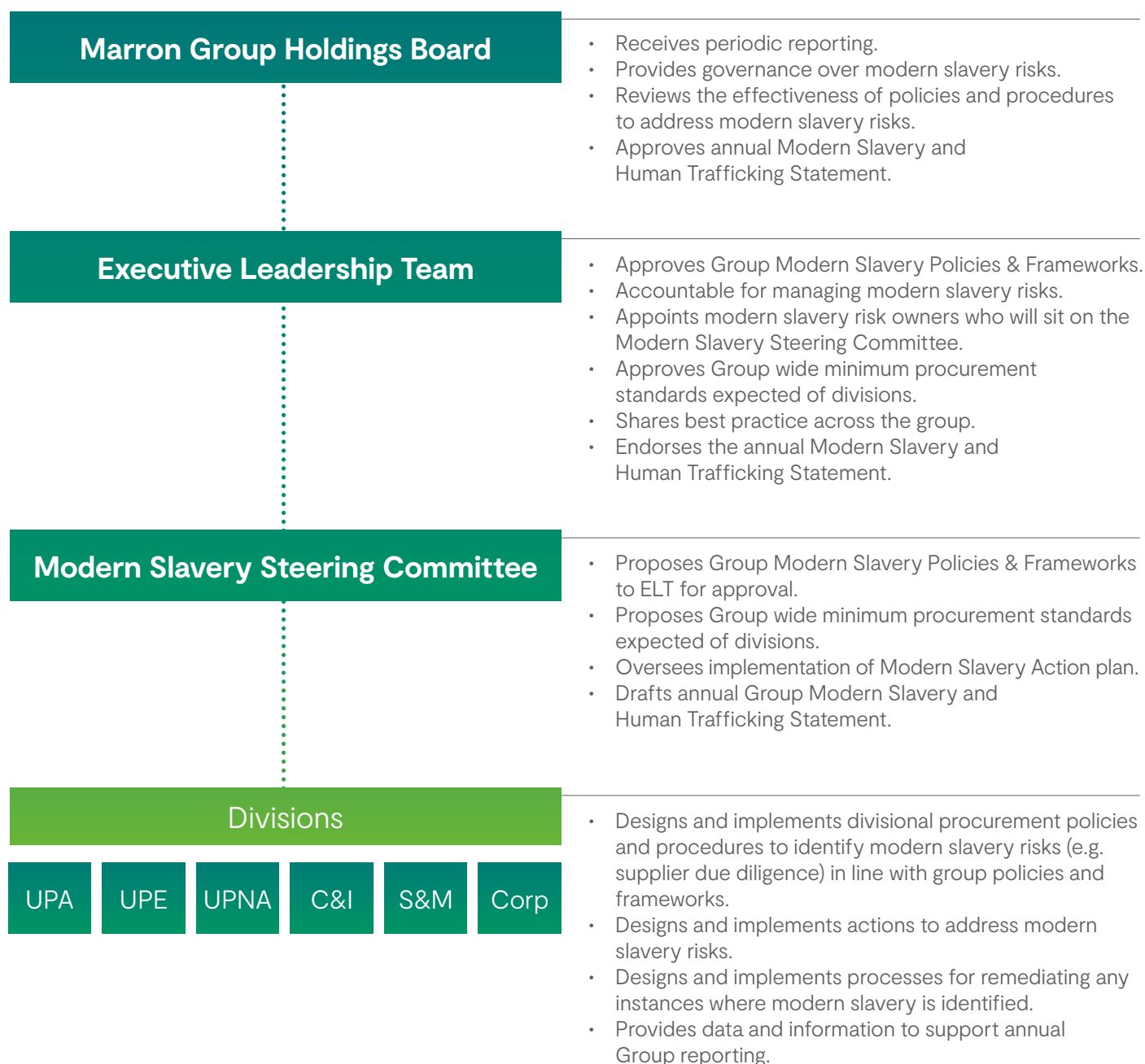
Our response to our modern slavery risks

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

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 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.

Divisional CEOs have nominated divisional modern slavery risk owners who make up the steering committee and share good practice between the divisions. The steering committee report to our Executive Leadership Team (made up of the Group CEO, Group CFO and Divisional CEOs).



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.

Values in Action (Code of Conduct)	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. It includes how to report non-compliant, illegal or unethical behaviour or actions via our Speak Up portal.
Whistleblowing Policy	Defines reportable conduct and provides details of how people can report such conduct including via our Speak Up portal (see above).
Environmental, Social and Governance (ESG) Policy	Outlines our environmental, social, and corporate governance principles, including: • 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. • Upholding freedom of association and the effective recognition of the right to collective bargaining. • 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. All employees are required to take these principles into account in their decision making.
Group Delegations of Authority	The Group Delegations of Authority embeds the requirement for all staff to take ESG principles into account when exercising delegated authority.
Modern Slavery and Human Trafficking Policy	Sets out minimum standards expected of our divisions to address the risk of modern slavery and human trafficking in their operations or supply chains.
Group Procurement Policy	Outlines Navitas requirements for the procurement of goods and services. This includes: • requirements that goods and services are sourced in a socially and ethically responsible manner. • expectations for due diligence and the minimum standards we expect our suppliers to meet. • Requirements for ongoing monitoring of suppliers and reporting of concerns.



Action taken in FY22 to mitigate identified risks

Our operations



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.

A new HR management system has been implemented for our sales and marketing staff in our source countries. As a result of this implementation, employee policies and procedures have been reviewed and improved where required.

LOOKING AHEAD

We will continue to review our suite of HR policies and procedures to ensure appropriate consideration of human rights and modern slavery.



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.

LOOKING AHEAD

We intend to:

1. Strengthen our agent monitoring systems to include consideration of modern slavery and human trafficking risk indicators, such as the non-enrolment of a student.
2. Ensure that information relating to agent behaviour is aggregated and shared globally.
3. Continue to improve awareness of modern slavery and human trafficking risks among our employees, particularly those that work with agents and students.
4. Improve agent awareness of modern slavery and human trafficking risks and how they may inadvertently contribute to modern slavery and human trafficking.
5. Provide students with information about modern slavery and human trafficking and 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 FY22 we received three reports from whistleblowers. Disclosures raised concerns about staff conduct and adherence to policies. All reports capable of being addressed under the Whistleblower Policy were investigated and addressed. A summary of whistleblower reports is provided to the Board twice yearly 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 2022.

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
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

Entity Name	Trading Name(s)	Location
Navitas Ventures Pty Ltd	Not applicable	Australia
National Excellence in School Leadership Institute Pty Ltd	Not applicable	Australia
Newcastle International College Pty Ltd	Newcastle International College	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
SAE Austria GmbH	SAE Creative Media Institute	Austria
SAE Institute Belgium SPRL	SAE Creative Media Institute	Belgium
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
School of Engineering France SARL	SAE Creative Media Institute	France
SAE Germany Holdings GmbH	Not applicable	Germany
SAE-Institute GmbH	SAE Creative Media Institute	Germany
SAE Alumni GmbH	Not applicable	Germany
Navitas Germany GmbH	Lancaster University Leipzig	Germany
SAE HELLADOS Monoprosopi E.P.E.	SAE Creative Media Institute	Greece
Navitas Eduservices Private Limited	Not applicable	India
Anuvac Confab Worldwide Private Limited	Not applicable	India
SAE Italia S.R.L. International Technology College	SAE Creative Media Institute	Italy
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
SAE Technology Group Holdings B.V.	Not applicable	The Netherlands
SAE Netherlands B.V.	SAE Creative Media Institute	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

Entity Name	Trading Name(s)	Location
Navitas Asia Holdings Pte Ltd	Not applicable	Singapore
Navitas Education Centre Pte Ltd	Not applicable	Singapore
SAE Institute Pte Ltd	Not applicable	Singapore
SAE Institute, izobraževanje ma področju audio, video in filmske tehnike, d.o.o., Ljubljana	Not applicable	Slovenia
SAE Technology Group Spain SL	SAE Creative Media Institute	Spain
Zunzil Invest S.L.	Not applicable	Spain
Australian College of Business and Technology (Private) Limited	Not applicable	Sri Lanka
School of Audio Engineering Sweden Aktiebolag	Not applicable	Sweden
SAE Institute Switzerland AG	SAE Creative Media Institute	Switzerland
SAE Gesellschaft für Studiotechnik mbH	Not applicable	Switzerland
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
SAE Education Limited	SAE Creative Media Institute	United Kingdom
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

Entity Name	Trading Name(s)	Location
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
National Excellence in School Leadership Institute, LLC	Not applicable	United States of America
NVT Consulting Company Limited	Not applicable	Vietnam

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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