

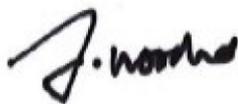
Modern Slavery Statement FY2025

This document is under consideration for approval by the Australian Attorney-General's Department, and has not been officially published on the Australian Modern Slavery Statement Register.

Message from us

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

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



Francesca Woodward

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



Jaime Cortes

Chief Executive Officer

December 2025

Reporting entity

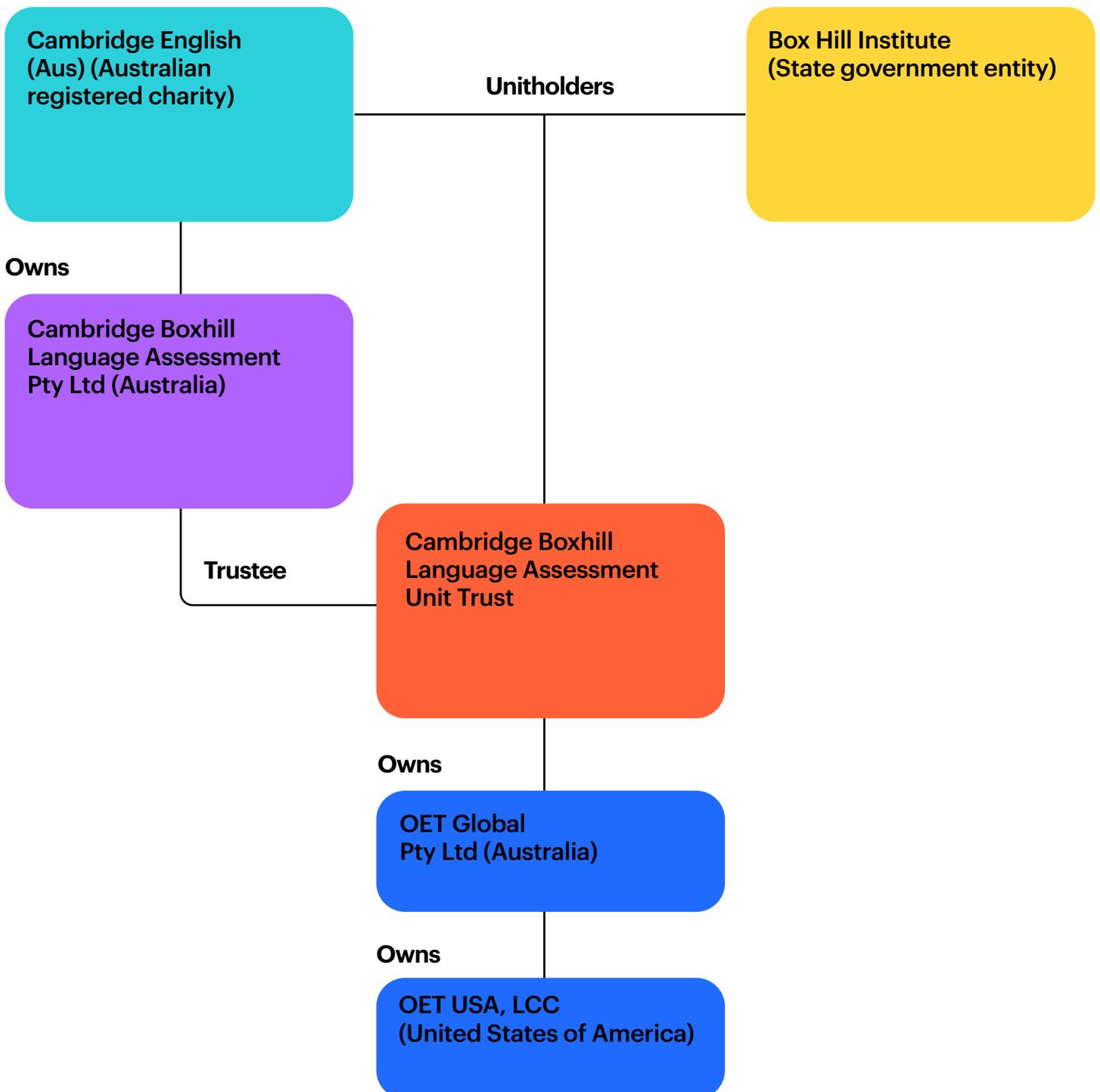
Name	Cambridge Boxhill Language Assessment Pty Ltd ATF Cambridge Boxhill Language Assessment Unit Trust
ABN	51 988 559 414
Trading name	OET
Entity type	Unit Trust
Registered office	Level 17, 452 Flinders Street, Melbourne VIC 3000
Place of incorporation	Australia
Status	Corporate Trustee is Registered

This modern slavery statement relates to the 1 August 2024 to 31 July 2025 reporting period for the purposes of the Modern Slavery Act 2018 (Cth) in Australia and Modern Slavery Act 2015 in the United Kingdom.

Our structure

OET is owned by Cambridge Boxhill Language Assessment Pty Ltd as trustee for the Cambridge Boxhill Language Assessment Unit Trust, a venture between Cambridge English (Australia) and Box Hill Institute.

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



Our operations

We are a global business that delivers the OET Test and related services to healthcare professionals. The OET Test is a high stakes English proficiency test that is administered in over 160 countries and recognised by healthcare boards and councils in Australia, Canada, New Zealand, the United Kingdom, the United States of America, Ireland, Dubai, Singapore and more. There are three forms of the OET Test: OET Test on Computer, OET@Home™ (remote-proctored) and OET Test on Paper.

Our service offering primarily relates to:

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

Our head office is in Victoria, Australia. As at the 31 July 2025, we have 96 employees globally, 92 of whom are based in Australia. From time to time, via a services agreements Cambridge University Press & Assessment employs individuals to work within our operations internationally.

Our supply chains

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

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

Test delivery partners

Test delivery partners are our largest supplier category.

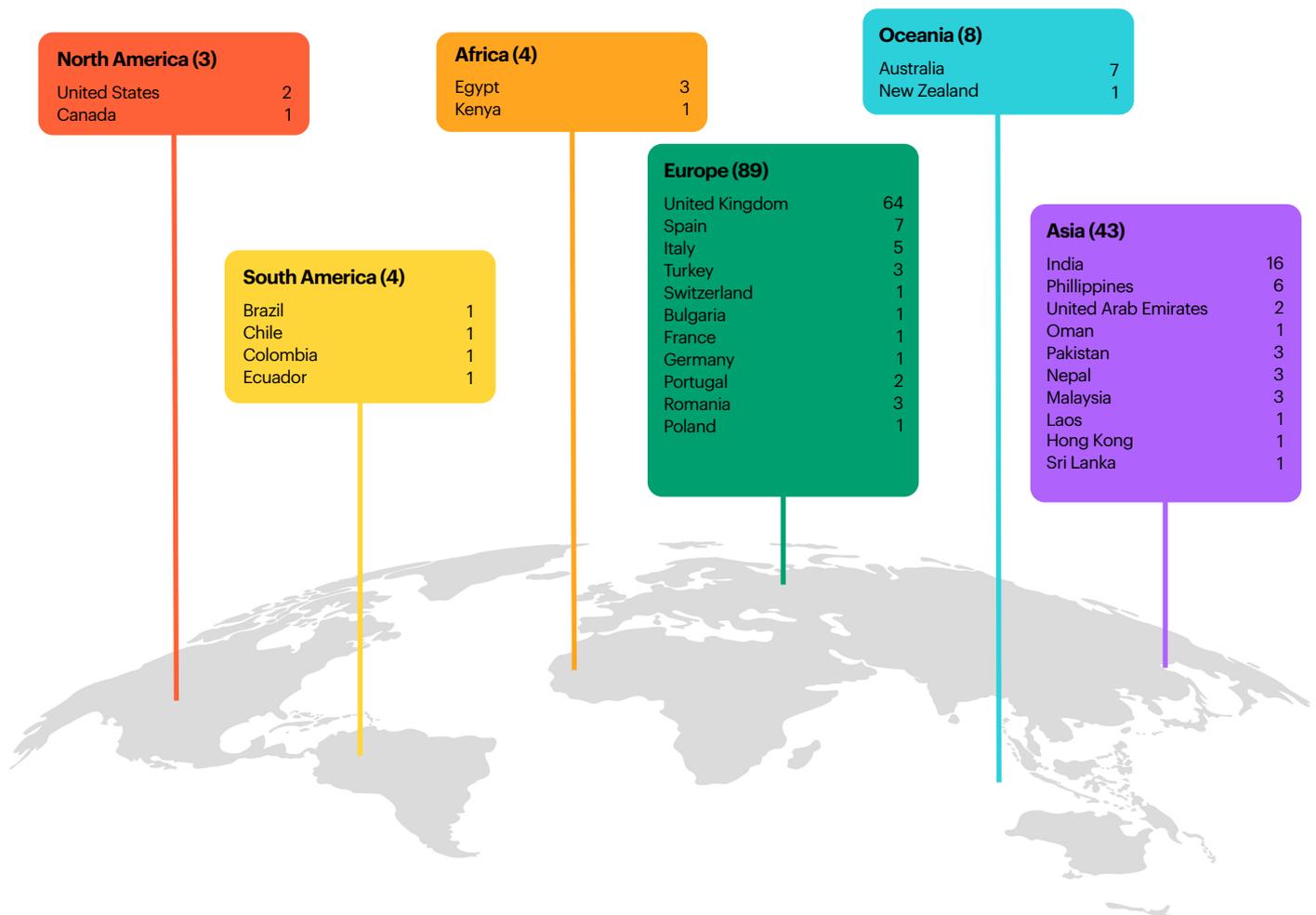
They provide venues for us to conduct the OET Test and help deliver the OET Test to candidates, including performing the operational processes required on OET Test days. Information on our test delivery partners can be found [here](#).



Preparation partners

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

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



Other suppliers

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

Risks of modern slavery practices

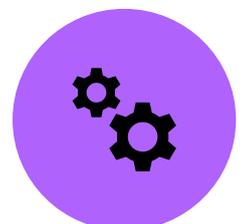
Operations and supply chain

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

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

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

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



Actions taken to assess and address risks

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

- ➔ Standard contract templates
- ➔ Policies and procedures
- ➔ Venue optimisation
- ➔ Country level risk assessments
- ➔ Regular test delivery partner meetings
- ➔ Employee training
- ➔ Supplier due diligence

Standard contract templates

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

Modern slavery

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

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

Health and safety

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

Audit rights and dispute resolution procedures

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

Termination

Our standard contract templates give us broad rights to terminate a contract with a supplier.



Policies and procedures

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

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

Risk Management Framework

The Risk Management Framework documents our approach to risk management for making business decisions. It sets out matters such as our tolerance for doing business, and how risks should be rated, documented and reviewed.

Country level risk assessments

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

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

Venue Optimisation program

Our Venue Optimisation program is an ongoing program that started in FY24 and includes:

- ➔ Uplifting all contracts in our test delivery partner network to our standard contract template with appropriate focus on modern slavery risk. In FY25, we renegotiated 5 agreements to which we applied the appropriate modern slavery clauses.
- ➔ All new venues were onboarded with our standard contract agreements.
- ➔ We have removed small, non-compliant and high-risk venues. In FY25 we concluded this initiative with the closure of 27 venues.

Regular test delivery partner meetings

As part of our commitment to preventing modern slavery, we have regular meetings with our test delivery partners. These engagements provide us with a platform to discuss their supply chain and operational challenges, including staffing and workforce management. Through these discussions, we aim to identify and address any concerns related to modern slavery, ensuring transparency, accountability, and continuous improvement across our partnership network.

Employee training

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

Effectiveness of our actions

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

Enforcing contractual rights

We have strong relationships with our test delivery partners as our engagement with them provides significant opportunities for them to grow their businesses. For this reason, our contracts with test delivery partners have been effective in addressing any concerns we may have with their businesses or conduct. Our standard form agreements with test delivery partners and other suppliers explicitly require adherence to modern slavery obligations, which also extend to their subcontractors and associated entities. Each supplier is further required to promptly report any actual or suspected breaches. We also have rights to suspend a venue provider's authority to administer the OET Test (and have previously done so) if we have reasonable cause to believe that they have materially failed to fulfil their obligations under the contract. The suspension process allows us to provide a recommended action plan and leverage our working relationship to help improve and effect change within their businesses.

Audits

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

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

Policy reviews

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

Key achievements in the FY25 financial year

Action

Required all employees to complete modern slavery training available on our employee online training platform.

Conducted country/region level Risk Assessments including topics such as modern slavery.

Commenced work on our Third Party Risk Management Framework, which incorporates modern slavery risks.

Through our standard contract template, embedded modern slavery clauses in all new test delivery partner contracts.

As per our FY24 Modern Slavery Statement, commenced work on developing an enhanced due diligence program for countries / regions with a high / very high risk of modern slavery.

Performance against FY25 planned actions

As part of our commitment to demonstrating year-on-year continual improvement, we have summarised how we have performed against our two planned actions for FY25, as set out in our FY24 Modern Slavery Statement:

Planned Action	Performance
Develop an enhanced due diligence program for countries/ regions with a high/very high risk of modern slavery	Modern slavery enhanced due diligence was progressed in FY25 alongside the development of a broader Third-Party Risk Management Framework. We will continue this work into FY26.
Renegotiate 103 test venue partner contracts based on our standard contract terms	<p>Our focus in FY25 shifted from renegotiating test venue partner contracts to seeking to reduce our footprint of test venue partners.</p> <p>We will continue to renegotiate with test venue partners in FY26 as those contracts come up for renewal.</p>

Planned actions for the FY26 financial year

In FY26, we will continue to embed the modern slavery mitigations in our business and in our supply chain. We have developed an action plan for FY26 that is both cognisant of our need to embed and the need to improve our approach to modern slavery risk management.

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

Action

Continue to develop an enhanced due diligence program for countries/regions with a high/very high risk of modern slavery, as we progress work on our Third Party Risk Management Framework.

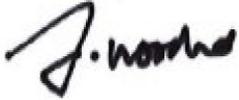
Continue to renegotiate our test venue partner contracts based on our standard contract terms as they come up for renewal.

Consultation with entities we own or control

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

Approval

This modern slavery statement was approved by the Board of Directors of Cambridge Boxhill Language Assessment Pty Ltd ATF Cambridge Boxhill Language Assessment Unit Trust on 27 November 2025.



Francesca Woodward

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



Jaime Cortes

Chief Executive Officer

Appendix

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

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



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