

# Cambridge Boxhill Language Assessment Pty Ltd (CBLA) Modern Slavery Policy

Owner:CEOAuthor:People, Culture and Risk

Version. Issue:1.0Approved By:BoardStatus:FINALClassification:Internal and External

Date: 8 December 2022

ALL PRINTED COPIES ARE UNCONTROLLED.

# **Table of Contents**

Or	gan	isation Vision & Mission	3
1.	Ir	ntroduction	3
2.	0	Dur Commitment	3
3.	S	cope	3
4.	V	/hat is Modern Slavery?	3
5.	Ν	lodern Slavery Statement	3
6.	0	overall Responsibility	4
7.	R	esponsibilities of Personnel	4
8.	0	Our Procedures	4
	8.1	Procurement Policy & Procedure	5
	8.2	Risk Assessments for New Projects, Business Plans and Markets	5
	8.3	Standard Contracts with Suppliers	5
	8.4	Whistleblower Policy	5
	8.5	Staff Grievance Policy	5
9.	Т	raining	5
10		Breach of Policy	6
11		Related Legislation	6
12		Policy Review	6

# **Organisation Vision & Mission**

#### Our Vision is to connect the world to better healthcare

#### Mission

- 1. To improve global healthcare services
- 2. To enhance the lives of patients & healthcare professionals
- 3. To create a sustainable enterprise where all stakeholders enjoy long term success

# 1. Introduction

This Modern Slavery Policy applies to Cambridge Boxhill Language Assessment Pty Ltd and its subsidiaries, OET Global Pty Ltd and OET USA, LLC (collectively, **we**, **us** or **our**). The policy sets out our expectations regarding modern slavery and the measures that we take to assess and address modern slavery in our operations and supply chains.

# 2. Our Commitment

CBLA is a global business and acknowledged that operating globally creates greater risks of unwittingly being involved with supply chains which have modern slavery risks. Therefore, CBLA is taking extra measures as set out in this policy. We have a zero-tolerance approach to modern slavery. We are committed to:

- (a) acting ethically and with integrity in all our business dealings and relationships;
- (b) implementing and enforcing effective systems, processes and controls to ensure modern slavery is not taking place anywhere in our own operations or supply chains; and
- (c) ensuring there is transparency in our own operations and supply chains.

We expect the same high standards from all of our internal staff and external contractors, suppliers and business partners.

#### 3. Scope

This policy applies to all persons working for us or on our behalf in any capacity, including the personnel in the following table, as well as agency workers, seconded workers, interns, agents, third-party representatives, suppliers and business partners (collectively, **personnel**);

Emp	loyees	Board Directors	Officers	Contractors (Including employees of contractors)	Volunteers	Suppliers	Consultants	Visitors
	√	$\checkmark$	$\checkmark$	$\checkmark$	$\checkmark$	$\checkmark$	$\checkmark$	$\checkmark$

This policy does not form part of any employee's contract of employment, and we may amend it at any time.

# 4. What is Modern Slavery?

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, including slavery, servitude, forced and compulsory labour, forced marriage, debt bondage, human trafficking, deceptive recruiting for labour services and the worst forms of child labour. These all have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

# 5. Modern Slavery Statement

CBLA is required to comply with the *Modern Slavery Act 2018* (Cth) in Australia and *Modern Slavery Act 2015* in the United Kingdom (collectively, **Acts**). This includes publishing a publicly available

annual modern slavery statement that sets out certain matters, such as the risks of modern slavery practices in our operations and supply chains, the actions taken to assess and address those risks and how we assess the effectiveness of those actions. Our modern slavery statements are available <u>here</u>.

It is important for all personnel to comply with this policy to ensure we are aware of the modern slavery risks in our operations and supply chains.

# 6. Overall Responsibility

The board of directors of CBLA is responsible for approving this policy and any material changes to it. It is also responsible for approving our annual modern slavery statement and ensuring that it complies with our reporting obligations under the Acts.

The CBLA Executive Team has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all personnel under our control comply with it.

The General Counsel and the Risk and Compliance Manager, collectively have primary and day-today responsibility for implementing this policy, monitoring its use and effectiveness and dealing with any queries about it. These responsibilities extend to:

- (a) monitoring, consulting, and auditing internal controls and procedures to identify risks of modern slavery practices in our operations;
- (b) monitoring and consulting with our suppliers, contractors and business partners to identify risks of modern slavery practices in our supply chains;
- (c) developing measures to assess and address any risks of modern slavery practices, including due diligence;
- (d) monitoring the effectiveness of those measures;
- (e) developing appropriate training materials and programs for personnel to comply with this policy; and
- (f) preparing our annual modern slavery statement.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on modern slavery and this policy.

# 7. Responsibilities of Personnel

Personnel must:

- (a) ensure that they read, understand, and comply with this policy;
- (b) prevent, detect, and report any actual or suspected modern slavery in our operations and supply chains;
- (c) avoid any activity that might lead to modern slavery or a breach of this policy;
- (d) provide this policy and communicate our zero-tolerance approach to modern slavery to suppliers, consultants, contractors, and other business partners; and
- (e) if they believe or suspect that there is modern slavery in our operations or supply chains or a conflict or breach of this policy:
  - for internal personnel, notify their manager or a member of the People, Culture and Risk team ; and
  - for external personnel, notify via the <u>privacy@oet.com.au</u> mailbox,
  - or make a report in accordance with our Whistleblower Policy.

Any personnel who is unsure whether a particular act, treatment of workers, or their working conditions within our operations or supply chains constitutes modern slavery should raise it with the General Counsel or the Risk and Compliance Manager.

#### 8. Our Procedures

We have several procedures in place to identify, assess and address modern slavery risks in our operations and supply chain, including:

#### 8.1 Procurement Policy & Procedure

The Procurement Policy & Procedure sets out our procurement framework for new products and services. We expect all personnel who are involved in procurement decisions to conduct due diligence into prospective suppliers, including considering any modern slavery risks associated with those suppliers, any modern slavery policy or other controls implemented by those suppliers to prevent modern slavery in their businesses and supply chains, and whether those suppliers have published their own modern slavery statements.

Contracting with a supplier who engages in, or condones, modern slavery breaches our zero tolerance approach to modern slavery and has significant social responsibility and reputational risks for us.

#### 8.2 Risk Assessments for New Projects, Business Plans and Markets

In addition to procurement, we also consider the modern slavery risks associated with new projects, business plans and markets. In particular:

- (a) our Global Market Risks Steering Committee was formed to oversee our global strategic objectives and ensure any risks are identified, evaluated, minimised and monitored;
- (b) we undertake a standard due diligence process to document any regulatory requirements and risks associated with entering into, and operating in, a new market; and
- (c) our Risk Management Framework sets out our risk management approach for making business decisions and risk tolerances, which include a zero tolerance for arrangements which breach ethical standards.

#### 8.3 Standard Contracts with Suppliers

We have standard contract templates that we endeavour to use with suppliers, including test delivery providers, printing and scanning providers, premium preparation providers and IT development suppliers. Those standard contracts contain modern slavery clauses that impose obligations on suppliers, such as to comply with applicable modern slavery laws, agree to not utilise slave, prisoner, child or any other form of forced labour in providing services to us, and to notify us if they become aware of those forms of labour in their businesses or the businesses of their subcontractors.

We expect that our suppliers will hold their own suppliers to the same high standards.

#### 8.4 Whistleblower Policy

Our Whistleblower Policy provides informal and formal mechanisms for all personnel (including suppliers and other business partners) to report concerns they observe, including any instances of modern slavery.

Whistleblower reports can be made through <u>Stopline</u>, an independent and confidential reporting service that is available in a number of languages and 24 hours a day, 7 days a week. Stopline can be contacted at:

- 1300 304 550 in Australia; and
- +61 3 9811 3275 for Overseas callers.

#### 8.5 Staff Grievance Policy

We aim to encourage openness and will support staff who raise genuine concerns in good faith under this policy, even if they turn out not to be modern slavery. We are committed to ensuring no one suffers any detrimental treatment (such as dismissal, disciplinary action or other unfavourable treatment) as a result of reporting in good faith their suspicion that modern slavery is or may be taking place in any part of our operations or supply chains.

#### 9. Training

The modern slavery training modules on GO1 are mandatory for all employees. We will also provide regular independent modern slavery training that will cover how to identify modern slavery risks and

the particular parts of our business operations and supply chains that are subject to a greater risk of modern slavery practices.

# **10. Breach of Policy**

Any employee who breaches this policy may face disciplinary action, up to and including termination of employment.

We may suspend and/or terminate our relationship with suppliers, consultants, contractors, and other business partners who breach this policy.

# **11. Related Legislation**

Modern Slavery Act 2018 (Cth) Modern Slavery Act 2015 (UK)

# **12. Policy Review**

This Modern Slavery Policy is a 'living' document that will be altered and amended as required. Reviews of the policy are completed every two years to ensure it is still relevant, up-to-date, effective and encompasses all of our obligations.