

MODERN SLAVERY AND HUMAN TRAFFICKING POLICY

INTRODUCTION

The Janison Education Group Limited ('Janison') is committed to acting ethically and with integrity in all our business dealings and relationships. To that end we intend to pursue best practices to combat slavery in all forms and to take a zero-tolerance approach to modern slavery. We are committed to implementing and enforcing robust systems and controls to ensure that there is no slavery or human trafficking in our own business or in our supply chains.

Janison is also committed to ensuring that there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains. We expect the same high standards from all of our contractors, suppliers and other business partners.

This Policy sets out our overall approach to the fight against modern slavery and human trafficking.

JANISON'S STRUCTURE

Janison is a provider of innovative learning and assessment solutions in the information technology sector. The Janison Education Group is the 100% owner of Janison Solutions Pty Ltd, LTC Hold Co Pty Ltd, LTC Language & Testing Consultants, Academic Assessment Services Pty Ltd, Janison Asia Pte Ltd (incorporated in Singapore) and Janison Education Inc (Incorporated in USA). We have our head office in Australia with over 190 employees worldwide. We provide our services to over 100 countries around the globe.

Janison had a global annual revenue for the financial year 2020/2021 of \$A30.2 million.

Our supply chains include the services provided by external exam supervisors, contractors and subcontractors and also include the provision of office services and supplies, such as cleaning and IT equipment.

WHAT IS MEANT BY MODERN SLAVERY

- Modern slavery is a crime and a fundamental violation of basic human rights. It takes various forms including slavery, servitude, forced or compulsory labour and human trafficking all of which have in common the deprivation of a person's liberty in order to exploit them for personal or commercial gain.
- In all cases, some of the most vulnerable people in society are stripped of their dignity and basic freedoms and forced to work for someone else's gain or benefit.

POLICY STATEMENT

- Janison is committed to taking steps to ensure that modern slavery is not taking place:
 - in any part of our own business; and
 - in any of our supply chains.
- Janison expects all members of staff:
 - to work with us as we take these steps;
 - to remain vigilant in identifying circumstances where there is a risk that modern slavery might be occurring in any part of our business or in any of our supply chains;
 - to report any such circumstances to senior management in full and without delay; and
 - to conduct their own personal and domestic affairs in such a way to ensure that they are in no way connected with modern slavery either through the commission of a criminal offence or through actions or omissions that might bring themselves and Janison into disrepute.
- For the purposes of this Policy, "members of staff" means all persons working for or with Janison in any capacity including: officers and directors, employees, workers, contractors, secondees, interns, agents, consultants and agency workers.
- Janison expects the same standards from all of its contractors, suppliers and other business partners. We will seek to ensure, where reasonably practicable, that our contractors, suppliers and other business partners are contractually obliged to comply

with terms that reflect the spirit and intention of this Policy in their own businesses and in their own supply chains in support of the general eradication of modern slavery.

- Janison will from time to time assess and review the risk that modern slavery may be occurring in any part of our own business and in any of our supply chains. In light of any such risk assessments we may from time to time seek specific reassurances from our contractors, suppliers and other business partners; and we will seek to carry out due diligence or specific audits either ourselves or through third parties to satisfy ourselves that modern slavery is not occurring.
- Janison is committed to transparency in our approach to tackling modern slavery consistent with the principles set out in the Modern Slavery Act 2018 (Cth) and the Modern Slavery Act 2018 (NSW). Due to the extent of our global network we will also comply, as required, with the U.K. Modern Slavery Act 2015.

DUE DILIGENCE PROCESSES FOR SLAVERY

We have, or intend to, put in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistleblowers.

As part of our initiative to identify modern slavery and mitigate associated risks in our business and supply chain, we intend to:

- Review our existing suppliers on a periodic basis.
- Map the supply chain broadly to assess particular products or geographical risks relating modern slavery and human trafficking
- Evaluate the modern slavery and human trafficking risks of each new supplier
- Conduct supplier audits or assessments which have a greater degree of focus on slavery and human trafficking where general risks are identified.

SUPPLIER ADHERENCE TO OUR VALUES AND ETHICS

We have zero tolerance of slavery. To ensure all those in our supply chain and contractors comply with our ethics we intend to put in place a supply chain compliance programme. This will consist of establishing a dedicated compliance team which will comprise representatives from the following departments:

- Legal.
- Finance.
- Human resources.
- Procurement.
- Sales.

TRAINING

As well as providing annual training to relevant members of staff responsible for compliance with this Policy, Janison intends circulating information to employees to raise awareness of modern slavery issues. The aim of the training will be to explain:

- The basic principles of the Australian Commonwealth and State Modern Slavery legislation;
- How employees can identify and prevent slavery and human trafficking;
- What employees can do to flag potential slavery and human trafficking issues to the relevant people within Janison; and
- What external help is available, for example, relevant government and independent websites.

OUR EFFECTIVENESS IN COMBATING SLAVERY

Due to the nature of the IT industry, we anticipate that some of our global operations may be susceptible to risks of modern slavery.

We will manage those risks to our organisation by maintaining consistent and high standards of due diligence and risk mitigation processes to monitor for and avoid modern slavery in all environments in which we operate, regardless of whether the environment or the suppliers with

whom we work are more or less vulnerable to modern slavery.

APPLICATION OF THIS POLICY

- This Policy applies to all members of staff.
- All members of staff are expected to:
 - read, understand and comply with this Policy; and
 - raise concerns with the Head of People and Culture. Please also refer to our Whistleblowing Policy about any suspicion that modern slavery might be occurring in any part of our business or in any of our supply chains at the earliest possible opportunity.
- Janison wishes to encourage openness and will support anyone who raises a genuine concern that modern slavery might be taking place in any part of our business or in any of our supply chains, even if that concern ultimately turns out to be mistaken.
- This Policy also reflects the expectations that Janison has of its contractors, suppliers and other business partners.

This modern slavery policy is made by the **JANISON EDUCATION GROUP LIMITED** on behalf of it and its subsidiaries

This policy statement was approved by our Board of Directors on 24th March 2022.

Michael Hill, Chairman
JANISON EDUCATION GROUP LIMITED

DATE: 24th March 2022