

# PROCEDURE

## Procedure Title

Modern Slavery Procedure

## Parent Policy

Modern Slavery Policy

## Preamble

Monash College Pty Limited (the College) is committed to detecting, preventing, reporting and promoting awareness of modern slavery occurrences within its own operations and supply chains and also with its offshore partners.

The College is required by Modern Slavery Act 2018 (Cth), (**the Act**) to publish an annual Modern Slavery statement if it has a revenue of at least \$100million for any given year. This must be submitted within 6 months after the end of the financial year. This procedure outlines the procedure for Board approval of the Colleges' annual Modern Slavery Statement.

## Definitions

### Modern Slavery

Refer to the [Modern Slavery Act 2018 \(Cth\)](#);

## Responsibilities

### Board of Directors

The College Board of Directors has the responsibility for Monash College's strategy and management of modern slavery risks, including approving the signing of the annual Modern Slavery statement.

### Senior Leadership Team

The Senior Leadership Team is responsible for ensuring compliance with the Modern Slavery policies, procedures and controls; including ensuring adequate resources are in place to ensure slavery and human trafficking isn't taking place within the College's operations, supply chains and offshore operations.

### Governance

Governance is responsible for developing and monitoring action plans to effectively manage modern slavery risks within Monash College's offshore partnerships to ensure compliance with the Modern Slavery Act.

### Procurement

Procurement is responsible for developing and monitoring action plans to effectively manage modern slavery risks in the supply chain.

### People and Culture

People and Culture is responsible for addressing modern slavery risks in the recruitment process particularly when dealing with consultants and agencies in the recruitment of personnel, teachers, contract workers, consultants, casual workers, interns and others.

## Requirements

As required under the Act, the Modern Slavery Statement must cover the following:

- a) identify the reporting entity\*;
- b) describe the structure, operations and supply chains of Monash College; and
- c) describe the risks of modern slavery practices in the operations and supply chains of Monash College; and
- d) describe the actions taken by Monash College; or
- e) controls, to assess and address those risks, including due diligence and remediation processes; and
- f) describe how Monash College assesses the effectiveness of such actions; and
- g) any other information considered relevant.

\*Regardless of whether Monash College is the reporting entity or Monash University is the reporting entity issuing a consolidated report on behalf of its subsidiaries, Monash College will prepare the statement incorporating all the requirements mentioned above in collaboration with Monash University.

The statement should be:

1. Written in simple language.
2. Succinct, but cover all relevant points and link to relevant documents.
3. In English, but may be provided in other languages that are relevant to the supply chain.
4. The statement must include either a statement of the steps the College has taken during the financial year to ensure that slavery and human trafficking is not taking place in any of its supply chains and in any of its own business, or that the College has taken no such steps.

The Board is responsible for approving and signing the annual modern slavery statement for the financial year on the recommendation of the Audit and Risk Committee. As the signed statement must be submitted by 30 June of each year, the draft statement must be tabled to the Audit Risk Committee in the first quarter of the following year. It will then be approved and signed by the Chair of the Board and submitted to Monash University.

**Procedure - Monash University is the reporting entity issuing a consolidated statement covering its subsidiaries.**

| <b>Ref</b> | <b>Steps</b>   | <b>Responsibility</b>   |
|------------|--|---|
| 1.         | <p>Finance will prepare the statement with input from Procurement/Operations and People and Culture. The respective Divisional Directors are responsible for jointly preparing the Modern Slavery Statement. This will be completed within the first quarter of the year.</p> <p>The draft statement will be developed by seeking comment from the relevant people at Monash University.</p> | CFO /Company Secretary, Director People and Culture and Assistant Company Secretary |
| 2          | The draft statement will be tabled at the SLT meeting for endorsement and referral to the Audit & Risk Committee.  | CFO/Company Secretary and SLT   |
| 3          | Once finalised by SLT, the statement will be tabled at the Audit and Risk Committee (ARC) for endorsement and referral to the Board.   | CFO/Company Secretary and ARC   |
| 4          | Board to approve statement and Chairperson of the Board to sign statement.   | Board of Directors  |
| 5          | It will be submitted to Monash University for incorporation in the Monash University Statement.  | CFO/Company Secretary   |
| 6.         | <p><b>Record Keeping</b></p> <p>The College will ensure the Modern Slavery statement process is adequately evidenced by appropriate records and those records are securely maintained.</p>   | CFO/Company Secretary, Procurement, People & Culture                                |

## Records Management

The Modern Slavery Procedure is a Level 1 Governance Policy. The latest approved version of the Modern Slavery Procedure will be stored on the Policy Bank on the Monash College intranet. The policy owner will maintain a record of issues relevant to the Modern Slavery Policy for consideration at the time of review.

## Legislation and Standards

[Modern Slavery Act 2018 \(Cth\)](#)

|  |   |
|--|---|
| <b>Reference Policies and Supporting Documentation</b> | <p>Modern Slavery Policy<br/> Fraud, Bribery, Foreign Bribery and Corruption<br/> Staff Personal and Professional Code of Conduct<br/> Whistleblowers Policy<br/> Whistleblowers Procedure<br/> Procurement Policy<br/> Procurement Procedure</p> |
| <b>Responsibility for Implementation</b>               | <p>Chief Executive Officer<br/> Monash College Senior Leadership team<br/> Chief Financial Officer and Company Secretary</p>  |
| <b>Status</b>  | <p>Revised</p>  |
| <b>Key Stakeholders</b>                                | <p>Monash College Board of Directors<br/> Audit &amp; Risk Committee<br/> MCPL Senior Leadership Team.</p>  |
| <b>Approval Body</b>                                   | <p>Board of Directors</p>   |
| <b>Date Effective</b>                                  | <p>1/11/2020</p>  |
| <b>Next Review Date</b>                                | <p>31/10/2025</p>   |
| <b>Owner<br/>Job Title<br/>Division</b>                | <p>CFO/Company Secretary<br/> Finance</p>   |
| <b>Procedure Author</b>                                | <p>Compliance Specialist</p>  |

## Change History

| <b>Version number</b> | <b>Approval date</b> | <b>Approved by</b> | <b>Brief outline of changes</b>   |
|-----------------------|----------------------|--------------------|---|
| 1.0                   | 22 October 2020      | Board of Directors | New   |
| 1.1                   | 20 October 2022      | Board of Directors | Revised – Roles and responsibilities for new company structure. Removal of procedure if MC is reporting entity. |