

Modern Slavery Statement 2025





Principal registered office in Australia

Level 10
697 Collins Street
DOCKLANDS VIC 3008
AUSTRALIA
Ph: +61 3 9612 4400

IDP Education Limited ABN 59 117 676 463 and IELTS Australia Pty Ltd ABN 84 008 664 766.

Further information on our broader approach to community and corporate responsibility is available at www.idp.com/partners/corporate-responsibility.

This joint statement has been prepared in consultation with each reporting entity covered by this statement. It has been approved by the Board of Directors of IDP Education Limited and the Board of Directors of IELTS Australia Pty Ltd.

A handwritten signature in black ink that reads 'Tracey Horton'.

Tracey Horton
Chair
IDP Education

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Our commitment

01

IDP Education is a trusted leader in international education, championing innovation and insight to shape the future of the international education sector.

Our leadership extends beyond our global scale; it's about setting the standard for the international education sector. Across student placement, English language testing, and research, we consistently lead with deep insight, genuine care, and an unwavering commitment to helping both individuals and clients thrive in our of evolving global landscape.

For us, sustainability is woven into our purpose: **transforming lives through international education**. With a presence in over 60 countries, we have the influence and reach to enact real change.

We're a company built on trust, with a proud history of guiding students and test takers to take life-changing steps toward their future and supporting our clients. We remain committed to creating value by staying focused on quality and managing with discipline in today's environment while positioning the business to grow in the future.

Our commitment to being a trusted partner extends to how we operate, doing business ethically and responsibly, with a commitment to upholding human rights and preventing modern slavery in our operations and supply chain.

In FY25, we improved our supply chain risk management approach by partnering with Fair Supply; an ESG risk intelligence and compliance solution to support our modern slavery risk assessment and due diligence process. The insights gained from this approach included an in-depth understanding of our supplier risk profile beyond tier 1 suppliers and supported targeted supplier engagement with identified higher risk suppliers across our global supply chain, through supplier self-assessment questionnaires.

In FY25, we did not uncover any instances of modern slavery within our operations, supply chain, or among our partners. We acknowledge the realistic possibility of modern slavery occurring in any value chain, and we remain committed to diligently monitoring and proactively address these risks on an ongoing basis.

This statement outlines our approach to addressing modern slavery in compliance with the requirements of the Modern Slavery Act 2018 (Cth) for the reporting period from 1 July 2024 to 30 June 2025 (FY25).



About IDP

02

IDP is a global leader in international education services, helping people transform their lives through international education.



Founded in Australia in 1969, we now operate in more than 60 countries and support thousands of students and test takers every day through a unique combination of trusted partnerships, digital innovation and human expertise.



We partner with more than 1,000 quality universities and institutions across Australia, Canada, Ireland, New Zealand, the United Kingdom and the United States.



IDP has more than 2,000 expert education counsellors around the world. Our unbiased guidance helps students build personalised pathways to success.



IDP also makes IELTS available in more than 2,000 test locations, and online options. We focus on building trusted human relationships, supported by the innovative use of data and digital technology.

Our global presence

IDP operates around the world, both directly and through our wholly owned subsidiary companies and foreign branches.

We have subsidiaries in Australia, Bangladesh, Cambodia, Canada, China, Egypt, Hong Kong, India, Indonesia, Japan, Kenya, Nepal, New Zealand, Nigeria, Pakistan, the Republic of Korea, Singapore, Sri Lanka, Taiwan, Thailand, the Philippines, Türkiye, the United Kingdom, the United States and Vietnam.

Additionally, IDP has branch offices in Ghana, Malaysia, Mauritius, Oman, Saudi Arabia and the United Arab Emirates. For more detailed information on our subsidiaries, please refer to our Annual Report, available through our Investor Centre.

Beyond our direct presence, IDP also extends its services to other countries through third-party arrangements where we do not have a local office. This strategy allows us to make our services accessible to more individuals in more locations worldwide.

Reporting entities covered by the statement

This Statement is a joint modern slavery statement for the financial year ended 30 June 2025 covering IDP Education Limited ("IDP") and its wholly owned subsidiary IELTS Australia Pty Ltd ("IELTS Australia"), with both IDP and IELTS Australia being reporting entities under the Modern Slavery Act 2018 (Cth) (the Act).

IDP Education Limited and its wholly owned subsidiaries, including IELTS Australia, operate under shared internal policies and procedures. Therefore, any actions detailed in this statement regarding IDP's assessment and mitigation of modern slavery risks have been undertaken on behalf of both reporting entities.

For clarity, when we use "IDP," "we," or "our" in this statement, we are referring specifically to IDP Education Limited and its wholly owned subsidiaries, including IELTS Australia. No other IDP subsidiary meets the reporting entity criteria as defined by the Modern Slavery Act.

Global operations workforce and value chain

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IDP is a global international education company providing services in over 60 countries around the world to help people achieve their study or career goals.

Our purpose is to transform lives through international education. We do this through our international network of teams who serve our customers and clients across our four main businesses.

Our workforce

As of June 30 2025, our global team at IDP numbers 6,195 dedicated individuals across 31 countries. Ninety five per cent of our team members are located outside Australia, with the largest cohorts in South Asia and South East Asia.

We acknowledge that operating and employing people in countries identified by the Global Slavery Index as highly vulnerable to modern slavery presents potential labour rights risks. To address this, we've undertaken a thorough risk assessment of our direct workforce, identifying inherent geographic and role-based vulnerabilities.

We conduct ongoing reviews of our recruitment and employment practices across our entire network including the workforce of organisations we have acquired, through our country audit program and other people-related audits such as pay equity program. Our goal is to ensure that all our team members are employed under conditions that not only meet but exceed compliance and minimum requirements, fostering an environment where every individual feels valued and secure.

Our value chain

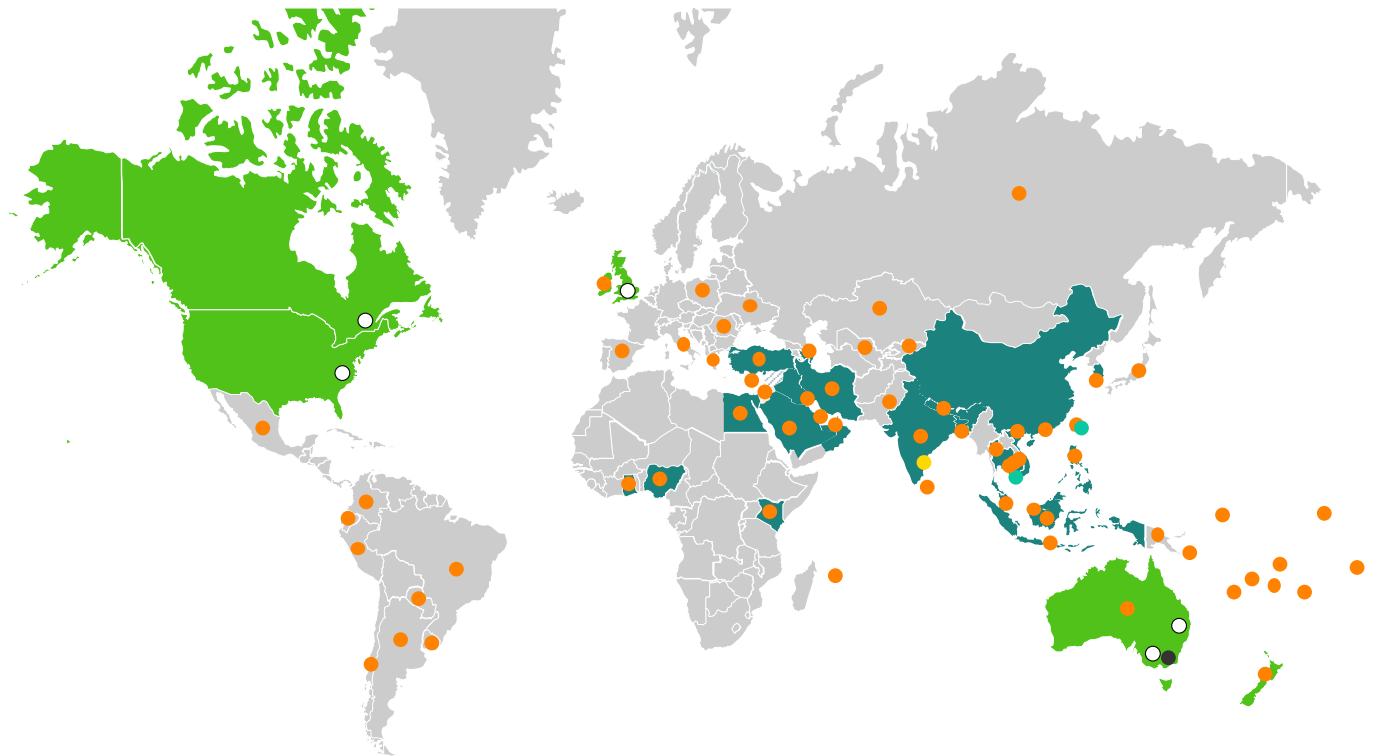
We work closely with a diverse range of suppliers and partners, including third-party test centre providers, contractors, and other service providers - to deliver our services. These relationships are absolutely critical to our success, and we take our responsibility to ensure our supply chains are free from modern slavery and human trafficking very seriously.



Our customers and services



Our locations



- Destination country (Student Placement)
- Source region (Student Placement)
- IDP Education IELTS testing countries
- English Language Teaching campuses
- Head office – Melbourne
- IDP Partnership offices
- Digital Campus – Chennai

Student Placement

- 200+ offices
- 35 source countries
- 1,000 institutions
- 6 destination countries
- 900,000+ students placed

English Language Testing

- 2,000 test locations
- Over 60 countries
- 12,500+ recognising institutions

English Language Teaching

- 6 campuses
- 2 countries

Our suppliers and partners

IDP procures products and services from suppliers based all over the world. Whilst global contracts are often procured from suppliers in Australia and the United Kingdom, we also engage with many local suppliers located in the same countries as our office locations.

In FY25:

- IDP's estimated total value of spend with suppliers was A\$236 million.
- IDP engaged with more than 6,000 suppliers from over 30 countries.
- Approximately 70% of our total spend was for the procurement of services.
- Major suppliers¹ represent 74% of our total spend.

1. Our classification of "major supplier" is based on a supplier having expenditure equal to or more than A\$100,000 in a single financial year.

Supplier spend in FY25 was higher than the previous year. Supplier categories were also updated this year for the purposes of modern slavery reporting, which altered the spread of categories of spend as described in the table on the following page.



The table below sets out IDP's key categories of spend and sourcing countries in the reporting period.

	Spend category	Description	Key sourcing countries ²	% of spend
	Financial and professional services	IDP partners with business and professional service suppliers to access specialised resources and expertise, complementing the work of its employees to meet specific technical and product requirements. <ul style="list-style-type: none"> • Technical consulting services • Systems implementation services • Legal, professional and audit services • Specialist contractor agencies 	Australia, India, United Kingdom	16%
	Building and facilities	IDP engages a range of suppliers to help us provide safe, productive and enjoyable facilities for employees, students and test-takers. <ul style="list-style-type: none"> • Office leasing and fit-out • Maintenance, cleaning and security services, waste management 	Australia, Bangladesh, Cambodia, China, India, The Philippines, Vietnam	19%
	IT hardware, services and software	IDP partners and procures a range of technology to enable us to deliver products and services to our customers. <ul style="list-style-type: none"> • IT consulting • Software and systems licenses • Computer and IT hardware • Web hosting and cloud and data center services 	Australia, Ireland, United States	10%
	Marketing and print	IDP procures a range of products and services to enable us to reach clients, students and test-takers. <ul style="list-style-type: none"> • Advertising services • Printed media and collateral • Promotional items 	Australia, India	18%
	Human resource services	IDP engages specialised services to support critical human resource functions. <ul style="list-style-type: none"> • Payroll services • Executive recruitment • Organisational development 	Australia, India, Indonesia	7%
	Insurance	IDP partners with reputable organisations to provide insurance products over different aspects of our operations.	India, United Arab Emirates	1%
	Other	<ul style="list-style-type: none"> • Office supplies • Shipping and couriers • Telecommunications • Travel and events • Staff benefits 		29%

We engage third-party testing centres as IELTS delivery partners to run our English-language testing in locations where we do not have a local presence. These delivery partners lease venues and engage staff such as invigilators and proctors to manage the delivery of IELTS tests. IDP manages the booking process and administration, as well as the marking and assessing tests and communicating results to test-takers.

IDP also has relationships with third parties as part of our Student Essentials offering. These partners provide essential services to students at their study destination. These services are important for supporting students' success on shore. Student Essentials include services such as health insurance, student accommodation and financial services.

2. Sourcing country denotes the invoicing location of the vendor.

How we identify and assess modern slavery risks

04

IDP remains vigilant in monitoring and addressing any identified modern slavery risks in our operations.

Direct workforce risks

To assess inherent modern slavery risks within our direct workforce, we considered the geographical distribution of our workforce against data that indicates the risk and prevalence of modern slavery in different jurisdictions globally. This analysis confirms that we have direct employees in high-risk geographies³, including:

- Bangladesh
- Cambodia
- Egypt
- India
- Kenya
- Nigeria
- Pakistan
- Saudi Arabia
- Sri Lanka
- The Philippines
- Türkiye

All these countries have a Global Slavery Index “Vulnerability Rating” over 50.

IDP is a service-based international education business, which means the vast majority of IDP employees are engaged in professional or office-based roles. However, our analysis has identified several roles that have been traditionally more vulnerable to exploitation across some of the countries outlined above, including office support staff such as cleaners, drivers and security guards.

The identified high-risk geographies were then considered against IDP’s risk and assurance activities, specifically the program of internal audit reviews at a country level that tests the compliance of local adherence to country obligations and IDP’s global policies. As such, we are satisfied that there is a sufficient review of controls relating to compliance with employment policies, laws and regulations for each country-level internal audit conducted.

Supply chain risks

Risk identification






Each year, IDP continues to enhance our modern slavery risk assessment process. In previous years, this has included improving the data quality that informs our risk identification process, to make more confident assessments of where modern slavery risks may occur.

This year, IDP partnered with Fair Supply, an ESG risk management and compliance tool that identifies and assesses modern slavery footprints of suppliers, and conducts detailed risk assessments using internationally recognised datasets. The analysis incorporates a range of risk factors, including the supplier’s geographic location, their industry, and the nature of the goods or services procured.

Over 90% of IDP suppliers were analysed for modern slavery risk through the Fair Supply platform. The output of this analysis has provided a more detailed yet nuanced approach to modern slavery risks across IDP, including identifying risks in tiers below our immediate suppliers. Major suppliers in industries of concern with high, moderate-high and moderate modern slavery risks were then considered for deeper assessment.

The UN Guiding Principles consider whether risks were ‘caused’, ‘contributed to’ or ‘may be directly linked to’ an organisation. Using this methodology, we did not identify any risks ‘caused’ or ‘contributed to’ by IDP. All the risks identified were in the category of ‘may be directly linked to’ IDP.

3. Referencing the high-risk countries from the Walk Free Global Slavery Index

Industry of concern	Nature of risk
 Business Services including Financial and Professional Services	There is a risk that suppliers of these services do not meet minimum requirements for minimum wage and conditions in higher risk geographies.
 Building and Facilities including Construction	There is a risk that building, facilities management and construction providers do not meet minimum requirements for minimum wage and conditions in higher risk geographies. There is a risk that materials sourced for facilities improvements and construction are produced in ways that do not meet minimum requirements for minimum wage and conditions in higher risk geographies.
 Marketing, Print and Media	There is a risk that the production of goods used for marketing and promotion could be associated with vulnerable populations in higher risk geographies due to it being a low-cost manufacturing activity.
 Travel and Events	There is a risk that venue suppliers of these services do not meet minimum requirements for minimum wage and conditions in higher risk geographies.
 Wearing Apparel	There is a risk that the materials and component parts sourced through apparel providers are produced in ways that do not meet minimum requirements for minimum wage and conditions in higher risk geographies.



Risk identification methodology

Fair Supply's supply chain risk analysis is performed using supply chain data from 190 countries and in relation to more than 15,000 industry sectors. Risk is quantified using a range of economic datasets and modelling coupled with human rights standards including with, the United Nations' System of National Accounts; UN COMTRADE databases; the Walk Free Global Slavery Index and the International Labour Organisation Global Estimates of Modern Slavery.

The results of this process, combined with IDP's spend data, are used to quantify the estimated number of people in forced labour per million dollars spent with each supplier, as well as a modern slavery risk profile down to tier 10 of the supply chain.

Risk assessment

The risk assessment conducted in the reporting period was based on the total FY24 procurement spend and supplier database. From the insights gained through the Fair Supply platform, IDP considered some suppliers for further due diligence assessment to better understand their work practices and supply chain in relation to modern slavery.

Further due diligence was required for suppliers with:

- An elevated risk of modern slavery
- Goods or services from an industry of concern
- IDP definition of major suppliers

A supplier with elevated risk means a supplier that has a high or medium-high risk profile through Fair Supply's assessment. Industries of concern for IDP's procurement activities means suppliers are categorised as providing Business Services, Building Services, Construction, Marketing, Print and Media, Travel and Events, and Wearing Apparel.

In FY25, 101 suppliers were identified for further modern slavery due diligence.

Suppliers are required to complete a questionnaire, with suppliers receiving a residual risk score based on their responses. The questionnaire also required suppliers to provide evidence of policies, procedures, controls and practices they have in place to minimise the risk of modern slavery occurring within their operations and supply chains.

At 30 June 2025, 14% of IDP's elevated risk suppliers had been assessed for residual modern slavery risk. The pace of assessments was slower than we had anticipated. Feedback from Regional Procurement Leads indicated that the new Supplier Questionnaire delivered through the Fair Supply platform was challenging for many of our suppliers to understand and complete, particularly for smaller and medium-sized enterprises. This resulted in some assessments being completed outside of the reporting period, supported by a member of the IDP Procurement team. Supplier assessments have continued into FY26.

Addressing risks

We continue our commitment to partnering with our suppliers to collectively improve human rights practices throughout our supply chain. If our due diligence assessment reveals a high residual risk of modern slavery, IDP collaborates directly with the relevant suppliers to mitigate these concerns. Our engagement with these suppliers involves:

- highlighting identified risks: we pinpoint specific responses that indicate modern slavery risks.
- recommending actions: we suggest clear steps for suppliers to adopt to address these risks.
- providing support: we assist suppliers in implementing the recommended actions.

In line with IDP's Supplier Code of Conduct and Modern Slavery Response and Remedy Framework, if an existing supplier is unwilling or unable to take satisfactory steps to address identified control gaps, IDP will initiate proportionate remedial actions. These actions could ultimately lead to contract termination. To date, we have not terminated any supplier contracts due to modern slavery.

Operational controls to address our modern slavery risks

Supplier governance



- Supplier Terms & Conditions clearly outline IDP's commitment to combating modern slavery, which are incorporated into all purchase orders for goods and services. These terms clearly outline IDP's requirements, enabling us to drive compliance with our direct suppliers and ensure they extend these expectations throughout their own supply chains.
- IDP has a Modern Slavery Response and Remedy Framework. This framework, inspired by Walk Free's guidelines, adopts a victim-centred approach and details our strategy for responding to and remedying identified instances of modern slavery.
- We partner with Fair Supply to strengthen our approach to modern slavery risk assessments and investigate suppliers and partners beyond Tier 1.

Audit and compliance



- Consistent management of our key compliance obligations across all global operations through our global Compliance Management Framework. This framework provides an integrated, strategic approach at the group level.
- Dedicated Group Internal Audit function that regularly tests the design and operational effectiveness of internal controls throughout our network, encompassing country management, operations and supplier governance. The team maintains a regular schedule of country audits to ensure adherence to IDP's global policies, procedures, and processes.
- Global Governance, Risk and Compliance (GRC) Management System implemented in the reporting period, to enable central monitoring of the areas within our Compliance Framework, including modern slavery risks.

Modern slavery training and resources



- Regional ESG Committees were established in IDP's most material regions of North Asia, South Asia, South East Asia and Middle East & Africa in FY25. Committees are responsible for managing and monitoring ESG risks and activities within their regions. Members of the Committees include Regional Directors and their leadership teams in Finance, Procurement, People Experience and Country Managers as required.
- Committees are supported by global Risk and Sustainability teams to develop relevant Action Plans and are provided training in utilising the Fair Supply platform and the Governance, Risk and Compliance Management System.

Measuring effectiveness

Modern slavery risks are constantly changing, and IDP is committed to continuously measuring the effectiveness of our supply chain initiatives.

This ongoing monitoring confirms that our risk framework is being effectively implemented. It also helps us identify and act on opportunities for improvement, ensuring our suppliers receive the support they need to enhance their practices.

Key metrics and insights from the modern slavery risk assessment process help IDP to measure the effectiveness of our programs. In our first year partnering with Fair Supply, we can report the metrics below.



While no instances of modern slavery have been reported, we continue to closely monitor this area across all IDP countries that engage with suppliers.

Governance and consultation

Protection against modern slavery is a key element of IDP's Corporate Governance Framework.

Corporate governance

We acknowledge that our global business model operates in diverse environments, some of which present a heightened risk of modern slavery. Our Corporate Governance Framework ensures responsible management, ethical conduct, and robust protection against modern slavery through comprehensive policies, internal controls, and risk and compliance management. Details of our corporate governance practices for the year ended 30 June 2025 are available in our 2025 Corporate Governance Statement.

The Board, through the Audit and Risk Committee, is responsible for oversight and management of material risks,

including modern slavery and human rights. Management of modern slavery issues and risks at IDP is led by the Sustainability and Risk functions and supported by regional procurement teams, who are accountable for implementing modern slavery activities and supplier engagement within their regions.

IDP's Sustainability and Risk teams keep our Group Sustainability Management Committee updated on key actions and insights. Ultimately, this Committee sets the overall direction for all our sustainability efforts, including modern slavery and human rights, across both our operations and supply chain.

Our governance structure



Policies and practices

Our IDP Code of Conduct sets the behavioural standards for everyone who works with us. It details how we conduct business, outlining the core principles and minimum expected behaviours. This code clearly states our commitment to ethical business practices and strictly prohibits any form of modern slavery or human trafficking. This applies globally to everyone representing IDP, including all team members, our Board of Directors, officers of IDP and its subsidiaries, and anyone engaged in a representative capacity.

We make sure everyone knows about the Code. It is part of our onboarding process, accessible on our intranet and website, and forms the basis of our annual mandatory compliance training. This training covers important areas such as risk management, anti-bribery and corruption, privacy, and bullying and harassment. We also regularly review our Code of Conduct and global policies to ensure they stay relevant and clearly define the behaviours we expect.

Every team member is responsible for understanding and following the policies that apply to their role. They also annually read and acknowledge the Code of Conduct and other relevant policies. Our leaders are accountable for fostering a work environment that encourages ethical behaviour and compliance. We investigate all alleged Code breaches and take appropriate action. This might involve investigations by our Group Internal Audit team, or the People Experience Global Investigations team. Any significant breaches of the Code are regularly reported to the board's Audit and Risk Committee.

In FY25, we received no reports related to modern slavery issues in our supply chain through our whistleblower channels. While this is positive, we understand it does not mean modern slavery issues don't exist. We continue to work to improve the effectiveness of our reporting mechanisms to ensure any such incidents are brought to our attention.



Supplier Code of Conduct

Our Supplier Code of Conduct clearly outlines the expectations we have for our suppliers and partners. This includes their adherence to human rights, fair labour practices, environmental protection and strict prohibitions against human trafficking. It also covers health and safety, anti-bribery and corruption, data protection, and overall ethical business conduct.

We expect all our suppliers to comply with this code, as well as with all local, national and other applicable laws and regulations in the jurisdictions where they operate.

The Code also provides a clear mechanism for suppliers to report any actual or suspected breaches, including concerns related to modern slavery, directly to IDP's global procurement team.



Whistleblower Protection Policy

Our Whistleblower Protection Policy gives everyone a safe and clear way to report concerns about serious issues such as modern slavery or human rights. We strongly encourage honest and ethical behaviour, and we are committed to providing an environment where employees feel secure raising concerns if something does not seem right. The policy also outlines a clear process for escalating these concerns.

Last year, we updated our policy to specifically include suppliers as whistleblowers and added more confidential contact channels to reach IDP's dedicated whistleblower investigations team.

All reports made under this policy are thoroughly investigated by our Whistleblower Investigations Team. All whistleblower activity is regularly reported to the board's Audit and Risk Committee.



Sustainability Policy

Our Sustainability Policy provides a clear framework that guides our decisions, operations, and activities. It ensures we always act ethically and responsibly, aiming to go beyond the expectations of both our stakeholders and ourselves.

A core principle of this policy is our deep respect for human rights. This includes a firm commitment to ensuring our supply chain remains free from all human rights violations, including modern slavery.

In last year's statement, IDP committed to further embed human rights considerations into our business practices by developing and implementing a global Human Rights Policy for IDP's operations and supply chain. A Human Rights Policy would explicitly demonstrate IDP's commitment to respect and support human rights, which demonstrates good international business practice.

In developing the foundations for the human rights policy, we reviewed our existing policies and practices for gaps in FY25. We found that human rights are explicitly referenced within two existing global policies – our Supplier Code of Conduct and the Sustainability Policy, but there is an opportunity to elaborate on the Company's commitment to respect and support human rights within operational policies and in the overarching business Code of Conduct. It was also concluded that our existing Modern Slavery Response and Remedy Framework is consistent with the UN Guiding Principles for Business and Human Rights and would meet the necessary requirements for dealing with possible human rights impacts.

In February 2025, the Group Sustainability Management Committee discussed and debated draft policy principles for a Human Rights Policy. IDP decided to continue progressing human rights due diligence through the sustainability and modern slavery program of work, assessing actual and potential human rights impacts in priority areas of our operations, without formalising a Human Rights Policy at this time.

Consultation

IDP operates directly and through wholly owned subsidiary companies and branches in over 60 countries globally.

In preparing this statement, we have engaged in consultation and communication with our Global Leadership Team, the Group Sustainability Management Committee and various teams and individuals across IDP. This collaborative effort helps us continuously strengthen our approach to identifying and addressing modern slavery risks. As part of this, we ensure the directors of IDP Education are fully informed about our obligations under modern slavery legislation and our reporting processes.

Collaboration and engagement

As part of our commitment to combating modern slavery within our supply chain, IDP participates in several professional networks. These groups meet regularly to discuss critical sustainability topics, including modern slavery. This includes a dedicated network of sustainability professionals specialising in sustainable supply chains.





IDP will continue to seek out opportunities to broaden our collaboration and engagement on our modern slavery programs.



Continuing our progress

IDP continues to develop our approach to supplier governance, risk management and controls to assess and address our modern slavery risks.

This year, we completed the commitments as set out in our 2024 Modern Slavery Statement to progress our approach to modern slavery. Looking ahead, we will be implementing key activities as part of a broader Procurement uplift program. These priorities, while not all specifically related to modern slavery risk, will support the overall supplier governance and risk framework that governs our approach to modern slavery.

	Focus area	How this will improve our approach to modern slavery
	Continue supporting suppliers to complete supplier assessment questionnaires	<ul style="list-style-type: none"> Complete due diligence of identified high-risk suppliers. Strengthen relationship with suppliers and build awareness of modern slavery risks.
	Rationalisation of IDP's supplier base to improve procurement efficiency	<ul style="list-style-type: none"> Reduce modern slavery risks in non-major suppliers in geographies of concern. Consolidate suppliers related to industries of concern to reduce category risks.
	Compliance and governance uplift to ensure consistent, compliant procurement practices across all regions and categories	<ul style="list-style-type: none"> Improve modern slavery due diligence at the supplier selection phase through improved ESG questionnaires and internal reviews managed by the Sustainability team. Supplier performance assessments to include ESG metrics throughout supplier lifecycle.
	Create a centralised Procurement Centre of Excellence (CoE) to drive strategic sourcing and governance	<ul style="list-style-type: none"> Support our established ESG Committees with procurement frameworks and track procurement outcomes.





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IDP Education Limited
ACN 117 676 463