Navitas Policy – Navitas Educational Advisors Management Policy and Procedures

Navitas Pty Limited
ABN 69 109 613 309

Document

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Responsibility	Channel Partner Services Manager
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Version Control

Issue Date:	Summary of Changes	Review Date
10/09/2012	Initial version	Annually
December 2013	Procedures and Policies Added	Annually
January 2014	Various Edits	Annually
March 2014	Group Internal Audit and Risk Manager's recommendations implemented	Annually
February 2015	Various Edits	Annually
July 2015	Various Edits	Annually
January 2016	Various Edits	Annually
July 2016	Various Edits	Annually
September 2016	Added Advisor Reference Check Policy	Annually
November 2017	Various Edits	Annually
February 2019	Various Edits	Annually
July 2020	Various Edits, updates to legislation and process	Annually
December 2020	Updated list of BUs	Intermittent
June 2021	Various Edits, updates to process	Annually
July 2021	Updated list of BUs, remove reference to referral status	Intermittent
January 2022	Updated StudyLink list, update list of BUs	Intermittent
March 2022	Updated list of BUs, update Studylink list	Intermittent
April 2022	Various Edits – EA Application changed to Expression of Interest	Intermittent
June 2022	Update to list of Studylink Business Units	Intermittent
July 2022	Removal of SAE Europe	Intermittent
June 2023	Various Edit	Annually

1. PURPOSE AND SCOPE

The purpose of this policy is to ensure that Navitas Educational Advisors are suitably engaged, informed and monitored, according to set terms and conditions to ensure compliance with the requirements of the Australian ESOS Act and the National Code, and reciprocal laws and regulations in Canada, New Zealand, Singapore, United Kingdom, the United States of America, United Arab Emirates, Netherlands and Germany.

This policy comes into effect immediately, and applies to:

- All Educational Advisors who actively recruit students for Navitas; and
- Staff of Navitas involved in the recruitment and monitoring of Educational Advisors.

For the purpose of this policy, Navitas incorporates the following Business Units:

Navitas Professional Institute Pty Limited ABN 94 057 495 299 CRICOS Provider Code 01328A, trading as Australian College of Applied Professions
Colleges of Business and Technology (WA) Pty Limited ABN 13 092 155 970 CRICOS Provider Code 02042G, trading as Curtin College
Melbourne Institute of Business and Technology Pty Limited ABN 11 074 633 668 CRICOS Provider Code 01590J, trading as Deakin College
Educational Enterprises Australia Pty Limited ABN 20 008 194 689 CRICOS Provider Code 00561M, trading as Eynesbury College
Edith Cowan College Pty Limited ABN 35 064 377 993 CRICOS Provider Code 01312J
Queensland Institute of Business & Technology Pty Limited ABN 38 076 195 027 CRICOS Provider Code 01737F, trading as Griffith College
Hawthorn Learning Pty Limited ABN 50 124 208 171 CRICOS Provider Code 02931G, trading as Hawthorn-Melbourne
Navitas Australia Pty Limited ABN 88 070 919 327 CRICOS Provider Code 00026A (USFP & HAPP), CRICOS Provider Code 01682E (ELICOS), trading as Taylors College
Navitas Bundoora Pty Limited ABN 92 143 736 789 CRICOS Provider Code 03312D, trading as La Trobe College Australia
Navitas English Services Pty Limited ABN 13 002 069 730 CRICOS Provider Codes 00289M (NSW), 00711B (QLD), 02252G (WA)
South Australian Institute of Business and Technology Pty Limited ABN 12 087 769 097 CRICOS Provider Code 02193C, Centre for English Language in the University of South Australia
Sydney Institute of Business and Technology Pty Limited ABN 18 074 470 447 CRICOS Provider Code 01576G
Western Sydney University International College Pty Limited ABN 25 604 796 189 CRICOS Provider Code 03663C

Fraser International College CRA BN 81210 5146
International College of Manitoba CRA BN 84676 4181
Toronto Metropolitan University International College CRA BN 77086 3678
Wilfrid Laurier International College CRA BN 73095 3536

School of Audio Engineering (N.Z.) Limited 457722 (NZBN: 9429039254900)
SAE Institute of Technology (Nashville) Corp NOL214F51735000
SAE Institute of Technology (Miami) Corp MIA214F01607000
SAE Institute of Technology (New York) Corp NYC214F01687000
SAE Institute of Technology (Chicago) Corp CHI214F55427000
SAE Institute of Technology (Atlanta) Corp ATL214F01977000
SAE Institute Inc (Vancouver) Registration No: BC0709422
SAE Institute Pty Limited ABN 21 093 057 973 CRICOS Provider Codes 00312F, trading as SAE Creative Media Institute

Lancaster University, Leipzig HRB 35377

Navitas Eduservices PVT. LIMITED. CIN: U74900DL2009FTC190112, operator of the UniSmarter Program

Twente Pathway College CCI: 72176571; RSIN 859016493
The Hague Pathway College CCI: 72176571; RSIN 859016493

Christchurch Institute of Business and Technology CN 4164958, trading as UC International College NZQA Provider number 7177
Navitas NZ Limited NVBN 9429037376802 in respect to the University of Waikato College

Curtin Education Centre Pte Limited CRN 200804822R, operating as Curtin Singapore
Curtin Education Centre Pte Limited CRN 200804822R, operating as Navitas English Singapore

Australian College of Business and Technology (Pvt.) Limited. CN PV10622, trading as Edith Cowan College Sri Lanka and Edith Cowan University Sri Lanka

Navitas Middle East FZ-LLC as service provider to Murdoch University Dubai CRICOS Provider Code 00125J

Cambridge Ruskin International College Limited CN 6407773, trading as ARU College
Birmingham City International College Limited CN 07445570
London Brunel International College Limited CN 05171106, trading as Brunel University London Pathway College
Hertfordshire International College Limited CN 5163612
International College Portsmouth Ltd. CN 06770123
International College at Robert Gordon University Limited CN 07154254
Keele University International College Limited CN 13631343
Leicester Global Study Centre Limited CN11669456
SwaN Global Education LLP CN OC418307, trading as The College, Swansea University
UA92 Global Limited CN12985058
Northampton IC Limited CN 09332824, trading as University of Northampton International College
Plymouth Devon International College CN 6822402, trading as Plymouth University International College

Navitas New York LLC as operator of the Queens College Global Student Success Program, pathway to Queens College New York
Navitas South Prince George LLC as operator of the Richard Bland College of William & Mary Global Student Success Program
Navitas Boston LLC as operator of the UMass Boston Navitas Global Student Success Program, pathway to University of Massachusetts Boston

2. POLICY

Navitas must abide by all legislative and regulatory standards, as specified under the Australian ESOS Act and the National Code, and reciprocal laws and regulations in Canada, New Zealand, Singapore, United Kingdom, United States of America, United Arab Emirates, Germany, and the Netherlands when appointing and managing its Educational Advisors.

Navitas must enter into a written agreement with each Educational Advisor it engages to formally represent it. The agreement must specify the responsibilities of the Educational Advisor and Navitas and the need to comply with the Australian ESOS Act and the National Code, and reciprocal laws and regulations in Canada, New Zealand, Singapore, and United Kingdom, the United States of America, United Arab Emirates, Netherlands and Germany. The agreement must also include:

- A process for Educational Advisor selection and review;
- A process for Educational Advisor monitoring;
- Corrective and preventative actions; and
- Termination conditions.

3. DEFINITIONS

Prospective Student	A person who intends to become, or who has taken any steps towards becoming a student, an 'overseas Student' or 'intending overseas Student' as defined by any laws and regulations applicable to Australia, Canada, New Zealand, Singapore, the United Kingdom, Germany, the United States of America, United Arab Emirates, and the Netherlands.
Student	A person who holds a Student Visa and is an 'overseas Student' as defined by the applicable regulation in Australia, Canada, New Zealand, Singapore, the United Kingdom, the United States of America, United Arab Emirates, Germany, and the Netherlands; or a person who holds a Permanent Residency in those countries and applies to study at Navitas through an Educational Advisor.
Educational Advisor	A person or an organisation with the authority to promote Navitas college's programs and services to prospective students or students in nominated territories.
Educational Advisor Expression of Interest	The Expression of Interest form is issued by Account Managers, marketing or admissions staff on behalf of Navitas. The form is used to evaluate an Educational Advisor's suitability to represent the group.
Educational Advisor Agreement and Agreement Terms & Conditions	The official agreement issued by Navitas includes terms and conditions that apply to all appointed on-shore and off-shore Educational Advisors, covering all entities of the group in Australia, Canada, New Zealand, Singapore, the United Kingdom, the United States of America, United Arab Emirates, Germany, and the Netherlands.
Educational Advisor Agreement Paragraph 'E'	Paragraph 'E' of the agreement states "Navitas may terminate this agreement at any time and with immediate effect by giving notice to the Educational Advisor" (generally applied where the Educational Advisor breaches any provision of the Agreement).
Educational Advisor Certificate	The official certificate of representation for the Educational Advisor to represent the Navitas group.

Educational Advisor Agreements may be 12 or 36-months	The length of service and engagement agreed between Navitas and the Educational Advisor, as specified in the Educational Advisor’s agreement.
Agreement Criteria	Navitas will engage in a formal written agreement with an Educational Advisor where they meet the criteria, assessed using a variety of measures including: a) Information recorded on the Navitas Educational Advisor Expression of Interest form. b) Due Diligence and Questionnaire Form, which includes a risk assessment. c) Positive referee reports. d) Clear sanction screening results. e) The Advisor agreeing to comply with its stated responsibilities. f) The Advisor agreeing to fulfil the requirements of any laws and regulations applicable in Australia, Canada, New Zealand, Singapore, the United Kingdom, the United States of America, United Arab Emirates, Germany, and the Netherlands.
Navitas Educational Advisor Identifier (client code)	The official and unique identifier code generated in the database (Salesforce) by Channel Partner Services Team, used to identify each Educational Advisor’s account in the database.
CRICOS	The Australian Commonwealth Register of Institutions and Courses for Overseas Students, as amended from time to time.
ESOS	The Education Services for Overseas Students Act 2000 of the Commonwealth of Australia, as amended from time to time.
National Code	The Australian National Code of Practice for Registration Authorities and Providers of Education and Training to Overseas Students, established pursuant to the ESOS Act, as amended from time to time.

Relevant Legislation and Regulations

Australia

- ESOS Act 2000 (Cth);
- ESOS National Code;
- Migration Act 1958 (Cth);
- Australian International Education and Training Agent Code of Ethics;
- Privacy Act and Australian Privacy Principles.

United Kingdom

- British Council - Guide to Good Practice for Education Agents;
- Immigration Rules, points-based immigration system (from Mar 2022);
- The Consumer Protection (Distance Selling) Regulations 2000Data Protection.

Singapore

- Private Education Act 2009;
- Consumer Protection (Fair Trading) Act 2003.

New Zealand

- The Education (Pastoral Care of Tertiary and International Learners) Code of Practice 2021;
- NZQA's Student Fee Protection Rules 2022.

Canada

- Immigration and Refugee Protection Act 2001;
- CBIE Code of Ethical Practice;
- Manitoba International Education Act (Bill 44)
- The Guide to the Code of Practice and Conduct Regulation for Manitoba Designated Education Providers, their Staff, Recruiters, and Contracted Agents.

United States of America

- American International Recruitment Council (AIRC) Certification Standards 2013;
- AIRC Best Practices in International Recruitment.

United Arab Emirates

- Advisors must hold a current business license/registration to work as an Educational Advisor.

Germany

- General Civil Law Regulations;
- National Code of Conduct for German Universities Regarding International Students;
- British Council's Guide to Good Practice for Education Agents.

Netherlands

- Code of Conduct International Student Higher Education.

Other

- The London Statement;
- EU General Data Protection Rules (GDPR).

4. PROCEDURES & RESPONSIBILITIES

1.1 General Appointment of Educational Advisors

Educational Advisors are appointed to represent the Navitas group or an individual Navitas college based on requests from the business units (college) or Source Country Office staff. All appointed Educational Advisors are issued with a *Navitas Agreement*, *Certificate of Representation* and the *Agreement Terms & Conditions* which confirms their status as authorised representatives for Navitas and ensures they understand their compliance responsibilities for any and all legislative and/or regulatory requirements Navitas adheres to within Australia, Canada, New Zealand, Singapore, the United Kingdom, Germany, the United States of America, United Arab Emirates, and the Netherlands.

Step 1: Request made by Educational Advisor for appointment as a Navitas Partner

Responsible	Action
Educational Advisor	Educational Advisor contacts Navitas Source Country Office, Business Unit, Account Manager or Regional Director requesting to represent Navitas.

Step 2: Contact Educational Advisor to initiate agreement process

Responsible	Action
Business Unit	Forward Educational Advisor's request to the nearest Regional Director or Account Manager.
Account Manager	Send "**Navitas Educational Advisor Expression of Interest Form**" to the Educational Advisor via email with explanation of all required supporting documentation the EA will need to submit to support their application.
Educational Advisor	Complete the "**Navitas Educational Advisor Expression of Interest**" and return to the Account Manager. Form can only be accepted as a typed PDF file, completed in full, with all required supportive documentation attached (as per Expression of Interest Form).

Step 3: Application review and initial Due-Diligence assessment

Responsible	Action
Account Manager	Review Educational Advisor Expression of Interest form and supporting documentation to ensure all sections of the form have been completed corectly and all requested supportive documentation is included. If any section is incomplete or missing, request the Educational Advisor to complete errors. If the form has been returned handwritten, as a JPG, or any other file type other than a PDF, request the Educational Advisor resubmit the typed form as a PDF. Assess Expression of Interest against internal Source Country Office metrics on Educational Advisor suitability. This may also include one or more of the following: • Educational Advisor office visit (if possible), or Google search, office photos supplied by the Advisor, and notes that confirm the office is legitimate and is located in a safe part of town (where students visit the office); • Educational Advisor location intel (market growth); • Market development (against internal market strategies);

	• Eligibility specific to market location (market risk rating); Level of professionalism of the Educational Advisor (industry intel); • Knowledge and skill level of the Educational Advisor; and/or • Reputation of the company.

If Educational Advisor passes Step 3, go to Step 4
If Educational Advisor does not pass Step 3, go to Step 5b

Step 4: Due Diligence Assessment & Reference Checks

Responsible	**Action**
Account Manager	Undertake Due Diligence Assessment using "**Due Diligence Checklist & Questionnaire Form"** (also see DD Risk Assessment Guidance Notes to ensure all possible risks have been considered). Account Manager to provide a supporting statement with reasons why the Educational Advisor is recommended for appointment (i.e. office visit, recommendation from third party provider etc). Source referee reports. Email the '**Navitas Educational Advisor Referee Report'** template to two of the referees noted on the Educational Advisor's Expression of Interest. Referees should be senior manager or executive level from another Education Provider with whom the Educational Advisor has worked with and successfully recruited quality students to for a minimum of 12 months.
Educational Advisor's Referees	External education provider to complete and return "**Navitas Educational Advisor Referee Report**" to Account Manager.
Account Manager	Once **Navitas Educational Advisor Referee Reports** are returned, assess quality of responses to determine the EAs suitability. Where both referee reports meet all criteria, proceed. *Note: Where an EA has received one suitable referee report and the second report is less than 12-months, the AM is required to seek written endorsement from the relevant General Manager Marketing & Recruitment (GM). GM to provide justification notes of how the decision was made to waive the requirement of both referee reports being more than 12-months.* *GM endorsement is not applicable where both referees are less than 12-months, the EA is not suitable for an agreement at this stage.*
	External referees should use the provided form and encouraged to return the report within one week. AM to follow up with referees as required. In cases where referees are unable to complete and return the form for a legitimate reason such as they are travelling, or their institute has a policy against completing the form: • Account Manager may conduct a phone interview with the referee and complete the form on their behalf with verification signature to be the Navitas staff member conducting the check.

Step 5: Submit complete Educational Advisor Expression of Interest form along with all required supporting documenation to Channel Partner Services Team

<table>
<tr><th>Responsible</th><th>Action</th></tr>
<tr><td>Account Manager</td><td>Email AgentManagement@navitas.com with the following:
Educational Advisor Expression of Interest form and all requested supportive documentation including:
Business registration certificate (Original and English translation where original not in English)
Any other relevant documents (i.e PIER or MARA papers/licenses)
Taxation registration details for entities required to claim GST or VAT
Educational Advisor 2x positive references
Completed Due Diligence Checklist and Questionnaire with recommendations including:
Justification of why the Educational Advisor should be appointed
Specify which business units or destination countries are to be included in the agreement
General Manager Marketing & Recruitment's endorsement (where applicable)
(Optional) email trail between Account Manager and the Educational Advisor</td></tr>
<tr><td>Channel Partner Services Team</td><td>Conduct initial assessment of whether forms are completed correctly, in full, and that all required documents have been submitted together.

Only set up account on Salesforce with 'Contract Pending' status where forms and supporting documents have been completed correctly, in full, and all required supporting documentation has been received.

Where Expression of Interest packs are incomplete, notify the Account Manager that no profile will be set up on Salesforce until all requirements are met in full. AM required to resubmit all required documents as one email once all errors are addressed.</td></tr>
</table>

Step 6: Channel Partner Services Team Compliance Assessment

<table>
<tr><th>Responsible</th><th>Action</th></tr>
<tr><td rowspan="2">Channel Partner Services Team</td><td>Before processing, double check that forms are complete. Return to AM for correction where incomplete or supportive documentation is missing.

If suitable for progression to compliance assessment, set up profile on Salesforce with 'Contract Pending' status. Upload and save all documentation received from the Account Manager or Business Unit. .</td></tr>
<tr><td>Conduct compliance assessment and sanction checks.

Where all sanction checks are cleared, tick 'sanction checked' and enter a note in the 'Notes and Attachments'</td></tr>
</table>

	section called 'Refinitiv Sanction Cleared' confirming the details of what has been sanction screened (business name, person/s with 50% or more ownership/control of the company and the companies banking institution). Enter approval note in Chatter, Tag Account Manager.
Channel Partner Services Team and Account Manager	***Successful:*** Where compliance assessment and sanction screening checks are complete, and the EA is approved for an agreement – Change Educational Advisor status to 'Contracted' on CRM.
	Unsuccessful: Where the compliance assessment and/or sanction checks are not successful – Change Educational Advisor status to 'Rejected' on CRM. Enter a note in the 'Notes and Attachments' section confirming why the EA agency was rejected. Send an 'Expression of interest has been unsuccessful notification' via email to the Account Manager who is responsible for forwarding onto the Educational Advisor.

If Educational Advisor is to be Contracted, go to Step 7

Step 7: Update Salesforce with Details for New Agreement

Responsible	Action
Channel Partner Services Team	Ensure all fields on Salesforce are complete for the Contract Pending Educational Advisor, ensuring the following is included on SF: • Principal Contact Name • Office Address • Main Email Address • Navitas Account Manager • Busines Registration Identification Number • Remittance email address • All documentation and communication attached to their record • Sanction check box ticked
	Enter the Business Units that should be included on the new agreement into the "Business Units in Agreement" field on Salesforce.
	Enter the Recruitment Territory/ies that should be included on the new agreement into the "Recruitment Territories in Agreement" field on Salesforce.
	AGREEMENT Create a new agreement number in the agreement's field. Enter agreement start date and end date: 36-month Service Agreement 1 April / 1 September 12-month Service agreement 1 July / 1 December • Change agreement status to "Sent to Agent". • Change the 'Agreement Owner' within the agreement number

	ACCOUNT STATUS • Change Educational Adviser's status from 'Contract Pending' to 'Contracted' • Select PPP Status to PLUS – Account NVT PLUS • Create a new entry under 'Navitas Plus Overviews • Select 'Club' within the Navitas Plus Starting Tier • Tick Navitas Plus Active box • Select 'Currency' (AUD OCEANIA and USD all other regions) • Add Navitas Plus Region • Add Navitas Plus Account Name

Step 8.1: StudyLink Process

Responsible	Action
Channel Partner Services Team	**STUDYLINK PROCESS** Set up access to StudyLink where the EA will be recruiting to one of the following Colleges using StudyLink: • Birmingham University Internaitonal College (BCUIC) • Brunel University Lodon Pathway College (BPC) • Cambridge Ruskin University International College (ARUC) • Curtin College • Curtin Collage Singapore (CSING) • Deakin College • Edith Cowan College (ECC) • Eynesbury College • Griffith College • Hertfodshire University International College (HIC) • International College Portsmouth (ICP) • International College of Robert Gordon University (ICRGU) • Keele University International College • Lancaster University Leipzig (LULC) • Leicester Global Study Centre • La Trobe College (LTCA) • La Trobe University Sydney Campus (LTUSC) • Murdoch Dubai • Plymouth University International College (UPIC) • South Australian Institute of Business and Technology (SAIBT) • Sydney Institute of Business and Technology (SIBT) • The College, Swansea University (TCSU) • The Hague Pathway College (THPC) • Twenty Pathway College (TPC) • UA92 • UCIC (New Zealand) • University of Northampton International College (UNIC) • Western Sydney University International College (WSUIC) • WSU Sydney City Campus (WSUSCC) Send email to support@studylink.com requesting StudyLink access to be provided to the EA, including • Advisor's Code • Advisor's Name • Business Unit/s

	• Screen shot of the *Contact Details* and *Address Details and Account Manager email* from SF Email to be cc to the Account Manager **ORACLE PROCESS** Send an email to FSD *Finance Service Desk* requesting for ONE vendor code and site to be created. Email must include: • Agent's code • Agent's full name • Type of agreement ie: AUS/UPE/CAN • Commission rates ie: Standard commission rates/HM 25%/NES 20% • Bank, country and sanctions clearance confirmation ie: HSBC GBR – Sanctions cleared • Screen shot of Educational Advisor *Miscellanous* section from SF including: Account Owner and Remittance email address • FSD will then proceed to create ONE vendor and site code on ORACLE • FSD will then proceed to update SF and add the ONE vendor code and site on SF • FSD will email Navitas global finance/commission teams to record regional specific finacial data in Oracle.

Step 8.2: Channel Partner Services Team to Generate Agreement and notify Account Manager when Agreement is Ready

Responsible	**Action**
Channel Partner Services Team	Generate the new agreement via Adode eSign, and send a copy directly to the EA with a cc to the AM (via Adobe)
Account Manager	Account Manager to follow up with the Educational Advisor for the return of the signed copy to Channel Partner Services Team within 30 days of issue.
Channel Partner Services Team	If the signed agreement is not returned within 30 days via Adobe eSign, SF automatically changes the status of the account from: 'Contracted' to '*Suspended'* (with an alert message – Advisor on temporary suspension)

Step 9: Agreement Accepted

Responsible	**Action**
Educational Advisor	The terms of the agreement is accepted and signed by the Educational Advisor and a copy is returned directly to the CPS via Adobe eSign. Status of account is automatically updated to 'C*ontracted',* including all child accounts.

Step 10: Educational Advisor Induction

Responsible	**Action**
Account Manager	Organise the provision of induction and initial product training with the Educational Advisor.
	Update CRM with notes about the Educational Advisor meeting, induction and initial product training.

4.2 Monitoring of Educational Advisor Conduct & Practice

Navitas regularly reviews Educational Advisor's conduct and practice according to the obligations under the Educational Advisor agreement terms and conditions. If, during the review process or at any time within the contracted period, areas of non-compliance are identified, Navitas will inform the Educational Advisor in writing of these concerns. The Educational Advisor will then be required to address areas of concern, to the satisfaction of Navitas within a specified timeframe. Navitas can terminate the agreement at any time by exercising clause 'd' or 'e' of the agreement where an Educational Advisor fails to adequately address issues of non-compliance either by remedial action or within what is considered by Navitas as a reasonable period of time.

Step 1: Educational Advisor Visits and Contact

<table>
<tr><th>Responsible</th><th>Action</th></tr>
<tr><td rowspan="3">Account Manager</td><td>Keep in regular contact with Educational Advisors, and conduct ongoing monitoring, support and training activities and office visits. Provide Educational Advisor with marketing collateral including:
• Navitas Program Matrix;
• Navitas Program and Fee Schedule;
• Navitas Regional Guides;
• Navitas College/Division Specific Brochures.</td></tr>
<tr><td>Ensure Educational Advisors have the latest Navitas marketing information (i.e. college brochures, college and course updates, and any changes to relevant legislation/regulations) on display. Findings to be included within the Trip Report.</td></tr>
<tr><td>CRM updated with 'Trip Reports' requesting information on all Educational Advisor visits and outcomes. Appendix B – Navitas Trip Report outlines the questions required in the Trip Report.</td></tr>
</table>

Step 2: Review Peformance of Educational Advisor

<table>
<tr><th>Responsible</th><th>Action</th></tr>
<tr><td>Account Manager</td><td>Review performance and conduct of Educational Advisor and forward any issues to Channel Partners Services Team via (AgentManagement@navitas.com) to determine the next appropriate course of action.</td></tr>
<tr><td rowspan="2">Channel Partner Services Team</td><td>Follow up with Account Manager (via email) on any performance issues. Send a Show Cause notice to request Educational Advisor to respond with explanation within 14 days. Change the Agents Account status to Suspended on Salesforce and StudyLink pending the outcome.</td></tr>
<tr><td>If consensus is reached between Regional Sales Directors and Chanel Partner Services Manager on terminating an agreement, the Educational Advisor will be formally notified of the Intent to Terminate the agreement in writing.</td></tr>
<tr><td>Educational Advisor</td><td>Respond to Navitas Channel Partner Services or Account Manager within 14 days providing explanation for performance.
Nil response from the Educational Advisor, after 14 days, will result in the cancellation of the agreement and an official letter of termination will be issued.</td></tr>
</table>

Step 3: Provide Educational Advisor's feedback to Account Manager (where applicable) and Marketing Team

Responsible	Action
Channel Partner Services Team	Forward Educational Advisor response to the Account Manager and Regional Director for discussion.

Step 4: Determine follow-on action and notify Educational Advisor

Responsible	Action
Account Manager and Regional Director	Review feedback from Educational Advisor and determine what action will be taken (i.e. to continue or terminate agreement) and advise Channel Partner Services Team.
Channel Partner Services Team	Notify Educational Advisor via email of action to be taken by Navitas as advised by the Account Manager and/or Regional Director.
	On the CRM, create a note recording the action taken and upload a copy of the letter on the Educational Advisor's SF account.

4.3 Renewing of Expired Educational Advisor Agreements

Educational Advisor 12-month Service Level agreements are issued for a term of one (1) year, with two set expiration points throughout the year – 1 July and 1 December.

Educational Advisor 36-month Service Level agreements are issued for a term of three (3) years, with two set expiration points throughout the year – 1 April and 1 September.

Note: Staggering Educational Advisor agreement expirations/renewals mitigates agreements expiring sporadically throughout the year. In the expiry year, Channel Partner Services Team will collate data and review the Educational Advisor's overall performance and engagement, recommending archive or renewal of the agreement.

The Account Manager are provided with the renewals list and required to provide their recommendation for renewing or archiving accounts. Where Channel Partner Services Team have recommended archiving an account and the Account Manager recommends renewal, clear justification and/or supporting evidence is required for reconsideration. The final determination on whether the expired Educational Advisor agreement will be renewed or archived is made by Channel Partner Services Manager.

Step 1: Determine agreements to be renewed

Responsible	Action
Channel Partner Services Team	Compile the list of Educational Advisor agreements up for expiration. Indicate Educational Advisor's engagement and performance (Offers/Acceptances/Enrolments) for the term of the agreement.
	Send data to Account Manager for their input on Educational Advisor performance.
	Review Educational Advisor performance against the following criteria to determine if agreement should be renewed or archived: • The Educational Advisor's compliance with the Navitas Educational Advisor Agreement, and Navitas Agreement Terms & Conditions; • Number and conversion rate of students the Educational Advisor has recruited during the term of agreement:

Account Managers	○ Student applications to offers; and ○ Offers to actual enrolment of students; • Feedback from Account Manager and/or Business Units as to why applications from potential students did not proceed to student enrolment status; • Number of student visa refusals for students recruited by the Educational Advisor; • Any feedback or information from students or third parties regarding the Educational Advisor; and • The quality, accuracy and currency of information and advice provided by the Educational Advisor to students. Make recommendation to renew or archive the account.

Step 2: Collate Account Manager & Business Unit feedback

Responsible	Action
Channel Partner Services Team	Collate Account Manager and Business Unit feedback. Conduct compliance check, make final determination to archive or renew agreements.

Step 3.1: Issue renewed Agreement

Responsible	Action
Channel Partner Services Team	Generate the new agreement via Adode eSign, and send a copy directly to the Educational Advisor, with the Account Manager copied into the notification (via Adobe).
Account Manager	Follow up with the Educational Advisor to ensure the new agreement is signed and returned to Channel Partner Services Team.
Channel Partner Services Team	Where the new signed agreement is not returned within 30 days via Adobe eSign, SF automatically changes the status of the account from: Contracted to *Suspended* (with an alert message – Advisor on temporary suspension).

Step 3.2: **OR** Issue Letter of Expiry

Responsible	Action
Channel Partner Services Team	Where the Account Managers have advised not to renew the agreement: 1. Send the 'non-renewal notification' directly to the EA via Adobe with a cc to the AM. 1. In SF, update the Educational Advisor status as "Archived". • Note on the record, the reason for the agreement not being renewed and archive the record. • Change the agreement status to "Expired". • Upload all review documentation as well as a copy of the letter. Send email to maggie.yang@studylink.com (StudyLink administrator) with a list of accounts that had authorisation to recruit to the following BUs, requesting to deactivate their StudyLink access (see step 8.1 for list of BUs on StudyLink).

4.4 Termination of an Educational Advisor Agreement

If during the process of monitoring an Educational Advisors performance, or at any time, it is determined that an Educational Advisor has acted unsatisfactorily, unethically and/or breeched the Navitas Agreement, or Agreement Terms and Conditions, the Navitas group can terminate the agreement in accordance with clauses 'd' and 'e' of the representative agreement.

Step 1: Escalate Educational Advisor Performance

Responsible	Action
Account Manager	Escalate any issues where an Educational Advisor has acted unsatisfactorily, unethically and/or breeched the Terms and Conditions of the Navitas agreement to Channel Partner Services Team for investigation.

Step 2: Suspend Educational Advisor Pending Investigation Outcome

Responsible	Action
Channel Partner Services Team	• Send a **Show Cause** notice to request Educational Advisor to respond with explanation within 7 days. • Change the Education Advisor's status in CRM to 'Suspended'.

Step 3: Investigate the Issue/Concern

Responsible	Action
Account Manager (under the guidance of the Channel Partner Services Team)	Perform a comprehensive investigation, which may include but is not limited to: • Review of the Educational Advisor's response to Show Cause notification; • Seeking feedback on the Educational Advisor from all Business Units and Account Manager (where applicable); • Meeting with the Educational Advisor to discuss the issue; • Seeking feedback on the Educational Advisor from the in-country Department Home Affairs office, Austrade, Embassy or reciprocal organisations.
	Collate documenation regarding the investigation and forward to the Channel Partner Services Manager. Specifiy the chosen course of remediation for approval.

Step 4: Regional Director and Channel Partner Services Manager Approval (where no consensus is made, escalate to Executive General Manager, Global Engagement)

Responsible	Action
Regional Director and Channel Partner Services Manager	Review all documentation from Account Managers investigation and determine appropriate remediation measure.
Executive General Manager, Global Engagement	Review and approve remediation measure.

Step 5: Communication

Responsible	Action
Channel Partner Services Team	Communicate approved course of action to Business Units/Account Manager.

Step 6.1: Remediation Action – Warning Letter

Responsible	Action
Channel Partner Services Team	Issue the Educational Advisor with a "First and Final Warning" letter. This letter must clearly outline the matter and list the supporting evidence. The warning letter must also address why the Educational Advisor has been permitted to continue working with Navitas as well as what measures will be required (from both the Educational Advisor and Navitas) to ensure such circumstances do not reoccur. Change the Educational Advisor's account status from 'Suspended' to 'Contracted'.

Step 6.2: Remediation Action – Cancellation Letter

Responsible	Action
Channel Partner Services Team	Issue the Educational Advisor with either an immediate termination notice citing claue 'e' or; issue a Intent to Terminate Contract letter citing clause 'd' 'Either party can terminate the agreement at any time by giving 14 days written notice to the other party.'
Account Manager	If the Educational Advisor has any concerns relating to the cancellation, it is the Account Manager who should manage these queries on behalf of Navitas.

Step 7: Communication with the Department of Home Affairs, Austrade, Embassies and/or Reciprocal Organisations (if necessary)

Responsible	Action
Channel Partner Services Team/Business Units/Account Manager	Communicate findings to governing bodies and partner institutions (where applicable).

Step 8: Account Management

Responsible	Action
Channel Partner Service Team	Upload all relevant documentation and warning/cancellation letter to the Educational Advisor's record on the CRM.

Step 9: Account Management – Educational Advisor Status

Responsible	Action
Channel Partner Services Team	Update the Educational Advisor status in the CRM to "**Cancelled**". Note on the record, the reason for the the agreement being cancelled, and archive the record. Change the agreement status to "**Cancelled**".

4.5 Reactivation of an Educational Advisor Agreement

Reactivation requests are submitted to Channel Partner Services Team for processing and compliance assessment. Where an agreement has been archived and the Account Manager requests to reactivate the account, a full new Expression of Interest pack is required where no/limited records exist on Salesforce, or the information on SF was recorded prior to 1 June 2020. Note: any original document not in English must be translated.

Step 1: Request to reactivate an agreement

Responsible	Action
Account Manager	Submit request to reactivate an account to Channel Partner Services Team including: • Reason for reactivation (i.e. advisor requested to represent NVT again, has a potential student, and a new marketing strategy which demonstrates ongoing potential). • New EA Expression of Interest Form (if not on file, or previous application submitted prior to 1 June 2020). • Business Registration Certificate or Sole Trader Registration (if not on file). • Tax registration details for entities required to claim GST or VAT. • DD Checklist & Questionnaire (if previous DD assessment conducted prior to 1 June 2020). • Two new referee reports (if none on file, or reports on file are older than 12 months). • Where all above information is already on file and current (recorded after 1 June 2020 and not more than 12 months old), submit the reason for reactivation along with the Educational Advisor Details Form to Channel Partner Services Team.

Step 2: Account Management

Responsible	Action
Channel Partner Services Team	• Process reactivation expression of interest. • Undertake trade sanction checks. • Conduct compliance assessment (if approved proceed, otherwise seek additional information from AM as required before proceeding to approve). • Once approved, change the Education Advisor Status from 'Archived' to 'Contracted' and notify the Account Manager • Follow steps 7 to 10

5. REVIEW

This Policy is reviewed annually by the Channel Partner Services Manager to ensure alignment to appropriate strategic direction and its continued relevance to Navitas' current and planned operations.

6. RELATED DOCUMENTS

This policy is to be read in conjunction with following documents which are reviewed annually:

- Navitas Educational Advisor Expression of Interest Form
- Due Diligence Checklist & Questionnaire
- Educational Advisor Details Form
- Educational Advisor Agreement and Terms & Conditions
- Navitas Educational Advisor Management Strategy.