Modern Slavery Statement

2024

RMIT UNIVERSITY

Contents

Vice-Chancellor's statement

At RMIT we take our responsibility as a substantial and international university, seriously. Inherent in our culture is the belief that everyone deserves opportunity, and this perspective informs our decisions. We endeavour to leverage our scale and our reach to both role model good practice and make a genuine impact through our own efforts to eliminate modern slavery across our operations and supply chains.

We welcome the appointment of Australia's inaugural Anti-Slavery Commissioner, marking a significant milestone in the nation's commitment to this important issue. We await the development of the Strategic Plan by the Commissioner's Office, which will be instrumental in guiding the implementation and evolution of the *Modern Slavery Act* (2018). This initiative promises to strengthen our collective efforts to eradicate modern slavery and safeguard human rights across the country.

Within RMIT we continue to fine tune our approach to managing modern slavery risk. Our compliance management system explicitly addresses the *Modern Slavery Act 2018* (Cth) and a new Third-Party Educational Delivery Policy now ensures compliance with Australian and foreign jurisdiction (where applicable) legislation, regulatory requirements and standards for all third-party programs and courses program providers.

2024 marked the first full year of the Modern Slavery Roadmap, outlining practical short to long-term actions to strengthen modern slavery risk management. Tender and supplier registration processes have been refined and, along with our new procurement guidance, ensure we take the decisions of our suppliers and contractors as seriously as we would our own.

We are leveraging the Australian Universities Procurement Network (AUPN) Anti-Slavery Program, gaining access to supplier risk benchmarking tools and sector-wide data insights, and our global, centralised complaints management system is now providing a public-facing digital platform for anonymous complaints regarding allegations of modern slavery breaches.

Year on year, as a community, we will stand together against modern slavery. As a university committed to civic contribution and with leading academics in the Human Rights field, the work we do creates pathways to choice and opportunity that we would like to be enjoyed by all.

Professor Alec Cameron
Vice-Chancellor and President

About this statement

This is RMIT's fifth Modern Slavery Statement (Statement) under the *Modern Slavery Act 2018* (Cth) (the Act) and covers the 2024 calendar year.

In responding to our reporting obligations under the Act, this Statement describes:

- RMIT's structure, operations and supply chains
- our consultation processes with RMIT's controlled entities
- potential for modern slavery risks across our operations and supply chains
- actions taken to assess and address risks of modern slavery across our operations and supply chains
- how we assess the effectiveness of our actions.

The reporting entity for this Statement is the Royal Melbourne Institute of Technology (ABN 49 781 030 034, trading as RMIT University) (RMIT). RMIT is the parent entity of the following wholly owned and controlled entities:

- RMIT Holdings Pty Ltd
- RMIT University Vietnam LLC (RMIT Vietnam)
- RMIT Spain S.L. (RMIT Europe)
- RMIT Online Pty Ltd
- RMIT Training Pty Ltd (trading as RMIT University Pathways/RMIT UP)

These entities are primarily based in Australia, Spain, and Vietnam, and consist of all RMIT's wholly owned and controlled entities under the Act (further details about these entities are set out in Appendix 1).

RMIT's controlled entities are all governed by a Board of Directors and are focused on supporting important strategic initiatives in pathways, online, and international operations. Financial performance is reported regularly, and operational highlights and risk management are reported at least annually to RMIT University Council.

All entities were involved in the drafting of this Statement and the development of the RMIT Modern Slavery Roadmap to ensure the modern slavery risks related to their operations and supply chains are fully understood and appropriately reflected in this Statement.

As required by the Act, RMIT's 2024 Modern Slavery Statement was endorsed and approved by the RMIT Council on 11 June 2025.
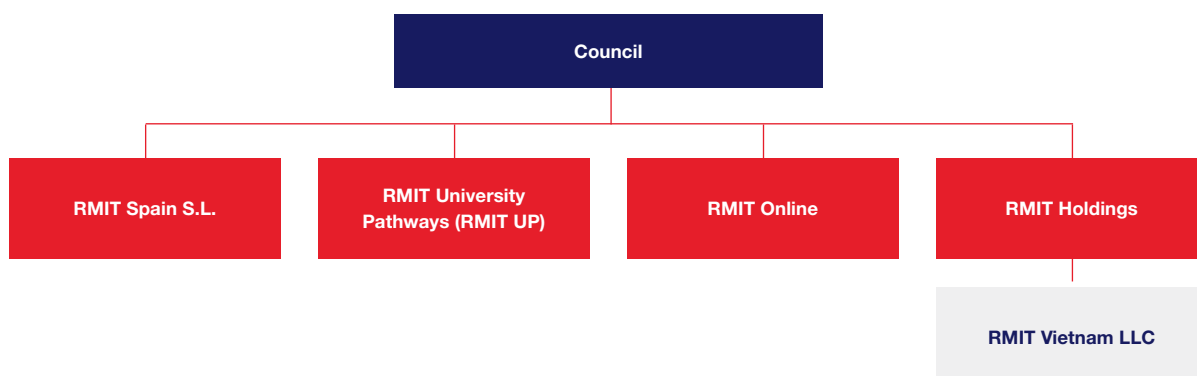
Introduction

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RMIT recognises modern slavery risk as a complex global human rights issue, and we continue to pursue the elimination of modern slavery across our operations and supply chains. This Statement outlines our work during 2024 to assess and address modern slavery risks as we continue to enhance our modern slavery response.

'Modern slavery' describes situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom. The Act defines modern slavery as including eight types of serious exploitation: trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services, and the worst forms of child labour.

It is important to emphasise that modern slavery is only used to describe serious exploitation that involves the loss of freedom. Modern slavery does not include practices like substandard working conditions or underpayment of workers. However, these practices are also illegal, harmful, and may be present in some situations of modern slavery.

The University's understanding of modern slavery risk areas considers a number of factors and assesses inputs from a range of sources. Our approach is informed by expert business and human rights advisors, the UN Guiding Principles on Business and Human Rights (UNGPs), the Global Slavery Index, government advice, and ongoing developments in modern slavery risks and issues both globally and in Australia.

Our key areas of potential risk relating to modern slavery are:

- third-party partnerships
- staff
- students
- supply chains (labour and materials).

As a signatory to the **UN Global Compact**, RMIT must operate in ways that, at a minimum, meet fundamental responsibilities in the areas of human rights (including modern slavery), labour, environment and anti-corruption. RMIT's awareness and actions to address modern slavery are maturing, and we continue to strengthen our approach each reporting period.

About RMIT

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RMIT is an international university of technology, design and enterprise with over 99,200 students and just over 12,000 staff globally. We empower people and communities to adapt and thrive across generations, with education, research and civic engagement that are applied, inclusive and impactful. Postgraduate, undergraduate, vocational education, foundation studies and online programs offer students a variety of work-relevant pathways.

Our three substantial campuses in Melbourne are located in the City, Brunswick and Bundoora, along with other Victorian locations. We also have two campuses and an English language centre in Vietnam and a research and innovation hub in Spain. In addition, programs are offered through partners in Singapore, Hong Kong, Sri Lanka, Indonesia, India and China, with research and industry partnerships across the globe.

Strong industry connections, forged over 137 years, remain integral to RMIT's leadership in education, applied and innovative research, and to the development of our graduates as skilled global citizens. This is why our alumni community is known for being highly employable and ready to adapt in complex times.

Alongside industry-relevance, creativity and inclusivity are hallmarks of an RMIT education. Our diverse global community of more than 500,000 alumni live, work and contribute in more than 150 countries around the world. Recognising that education is lifelong, many also return throughout their careers to refresh and update their skills or change career direction altogether.

For more information, visit **rmit.edu.au/about**.

Governance

RMIT University was established and is governed in accordance with the Royal Melbourne Institute of Technology Act 2010 (Vic). The responsible Minister throughout 2024 was the Hon. Gayle Tierney MP, Minister for Skills and TAFE and Minister for Water.

RMIT Council

The RMIT Council is the governing body that has overall responsibility for the general direction and superintendence of the University.

In 2024, the RMIT Council consisted of:

- The Chancellor
- The Vice-Chancellor
- The Chair of the Academic Board
- three persons appointed by the Governor in Council
- one person appointed by the Minister
- four persons appointed by the Council
- one person elected by and from students
- one person elected by and from staff.

Its primary responsibilities include setting the strategic direction and financial plans, monitoring University performance, ensuring effective risk management, overseeing academic activities, and monitoring major strategic projects.

Council held six meetings in 2024, including two strategic workshops. Council's focus for 2024 was monitoring progress of RMIT's Knowledge with Action strategy. This year also saw the further refinement of the key risk domains and Council-approved risk appetite statements as well as deliberation on the strategic implications from the Australian Universities Accord recommendations.

RMIT complies with the Universities Australia and University Chancellors Council's Voluntary Code of Best Practice for the Governance of Australian Public Universities (version that was in effect prior to December 2024).

Council has three standing committees. The Audit and Risk Management Committee; the Nominations, Remuneration and People Committee; and the Infrastructure, Information Technology Committee. These Committees provide advice, make recommendations, and where relevant, exercise delegated powers and report on these to Council.

- **Audit and Risk Management Committee (ARMC)**

  ARMC provides independent assurance regarding the University's risk, control and compliance frameworks and has oversight of its financial affairs, including statutory financial reporting. It is responsible for oversight of both the Internal Audit and External Audit functions.

  The ARMC holds the Council's responsibility for oversight of modern slavery risk management practices.

- **Infrastructure, and Information Technology Committee (IITC)**

  The purpose of IITC is to provide oversight of key infrastructure and information technology strategies and monitor key strategic projects to ensure they produce measurable benefits for the University.

- **Nominations, Remuneration and People Committee (NRPC)**

  NRPC has oversight of the appointment and remuneration of senior staff, Council members, and directors of controlled entities. It is responsible for the awarding of Honorary Degrees and for monitoring progress against key elements that make up the People Strategy, Audit and External Audit functions.
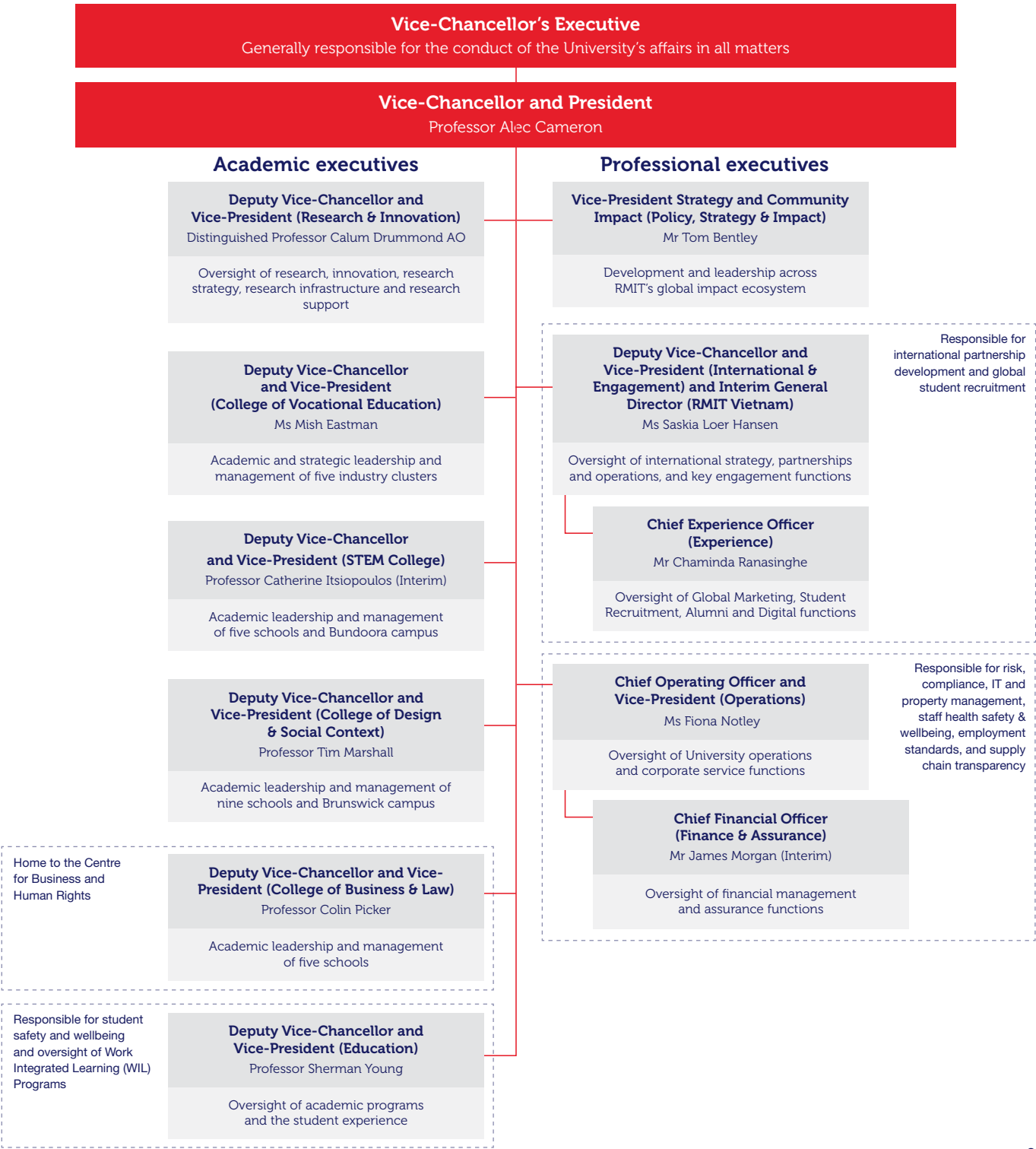
University Structure

Led by our Vice-Chancellor and senior executives, our structure is comprised of several operational portfolios, as well as academic colleges and schools.

For more information on the RMIT Governance Structure, see the **2024 Annual Report**.

RMIT 2024 Organisational Structure

RMIT, its people, its partners and supply chain all have a role in addressing modern slavery. The diagram below highlights key areas of responsibility across our functional organisational chart.

Vice-Chancellor's Executive
Generally responsible for the conduct of the University's affairs in all matters

Vice-Chancellor and President
Professor Alec Cameron

Academic executives

Deputy Vice-Chancellor and Vice-President (Research & Innovation)
Distinguished Professor Calum Drummond AO

Oversight of research, innovation, research strategy, research infrastructure and research support

Deputy Vice-Chancellor and Vice-President (College of Vocational Education)
Ms Mish Eastman

Academic and strategic leadership and management of five industry clusters

Deputy Vice-Chancellor and Vice-President (STEM College)
Professor Catherine Itsiopoulos (Interim)

Academic leadership and management of five schools and Bundoora campus

Deputy Vice-Chancellor and Vice-President (College of Design & Social Context)
Professor Tim Marshall

Academic leadership and management of nine schools and Brunswick campus

Home to the Centre for Business and Human Rights

Deputy Vice-Chancellor and Vice-President (College of Business & Law)
Professor Colin Picker

Academic leadership and management of five schools

Responsible for student safety and wellbeing and oversight of Work Integrated Learning (WIL) Programs

Deputy Vice-Chancellor and Vice-President (Education)
Professor Sherman Young

Oversight of academic programs and the student experience

Professional executives

Vice-President Strategy and Community Impact (Policy, Strategy & Impact)
Mr Tom Bentley

Development and leadership across RMIT's global impact ecosystem

Deputy Vice-Chancellor and Vice-President (International & Engagement) and Interim General Director (RMIT Vietnam)
Ms Saskia Loer Hansen

Responsible for international partnership development and global student recruitment

Oversight of international strategy, partnerships and operations, and key engagement functions

Chief Experience Officer (Experience)
Mr Chaminda Ranasinghe

Oversight of Global Marketing, Student Recruitment, Alumni and Digital functions

Chief Operating Officer and Vice-President (Operations)
Ms Fiona Notley

Responsible for risk, compliance, IT and property management, staff health safety & wellbeing, employment standards, and supply chain transparency

Oversight of University operations and corporate service functions

Chief Financial Officer (Finance & Assurance)
Mr James Morgan (Interim)

Oversight of financial management and assurance functions

Our compliance landscape

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Policy

Our policy approach is guided by an enterprise-wide Policy Governance Policy (PGP), which describes the processes for developing, approving, reviewing and maintaining policy documents at RMIT. The PGP applies to all policy documents developed for and on behalf of the University and its controlled entities and is intended to fulfil the following objectives:

- articulate how RMIT complies with legislative and regulatory obligations
- support the implementation of RMIT's strategic objectives and operational and academic plans
- reflect RMIT's cultural and organisational values
- embed delegations of authority and the limits of those
- reduce organisational risk, and
- enhance both academic and research integrity.

RMIT has committed to addressing modern slavery and broader human rights risks in all relevant policies.

Policies are subject to a major review at least every five years, or more frequently where changes to legislative or other requirements necessitate a review. The PGP was reviewed in 2024 and enhancements approved that give policy owners greater responsibility to:

- assure that compliance with the policy is being monitored, and material policy breaches are being reported to the relevant governing bodies
- prepare implementation and communication plans for every new or revised policy and evidence that these are being actioned
- conduct a post-implementation review of new or revised policies within two years of their approval to ensure they are working as intended.

During the review and consultation process, an assessment is made to determine whether the policy can be strengthened to support human rights issues, including modern slavery.

The table below outlines policies that either directly link to our approach to managing modern slavery risks or provide a governance mechanism through which modern slavery can be addressed. For more information about this policies visit the **RMIT Policy Portal**.

Policy	Context and relevance to modern slavery
Anti-Corruption and Fraud Prevention Policy	This policy defines the illegal or unacceptable, high-risk behaviours that constitute corruption and fraud, and reinforces RMIT's position of no tolerance for such conduct. Corruption and fraud can be enablers for modern slavery. The policy outlines strategies for the management of corruption and fraud risks. Encourages the highest level of integrity in organisational culture as an essential part of RMIT's management and corporate governance framework. This policy will be subject to consultation and a significant review in 2025. **Whistleblower Procedure** This procedure provides a way for anyone to report concerns they may have about illegal, unethical or improper conduct involving RMIT or its staff, Council members, students or researchers while providing protection to the person making the report. It does not replace existing complaints, conduct or compliance policies but provides an additional avenue for matters to be raised in relation to specific types of conduct. Authority for this document is established by the Anti-Corruption and Fraud Prevention Policy.
Code of Conduct	Provides guidance and defines the enforceable standards for our ways of working, ways of knowing and ways of being. Outlines how we work together as a community of professionals, academics, education practitioners and researchers, setting the standard for ethical behaviour, and guiding our culture and attitude towards the elimination of modern slavery.
Compliance Policy	Affirms RMIT's commitment to compliance management and describes RMIT's compliance management system. The compliance management system explicitly covers the *Modern Slavery Act 2018* (Cth), and processes include bi-annual compliance control assessments, in-depth review, reporting to Executive Management and ARMC, and monitoring through check-ins, allowing for greater assurance, as well as visibility and awareness across leadership. The program also assists RMIT in monitoring legislative changes pertaining to the Act. The policy itself promotes a positive compliance culture that fosters ethical conduct and supports good governance and operational excellence at RMIT.
Complaints Governance Policy	Sets out the principles and governance framework that inform our approach to complaint handling. ▪ To promote a culture where complaints are welcomed as an important component of our commitment to an inclusive, professional and productive work, research and learning environment. ▪ To establish the principles and governance framework that inform the RMIT Group's approach to complaint handling. ▪ To ensure complainants are treated with procedural fairness and respect. **Third-Party Complaints Procedure** This procedure applies to any third party wishing to make a complaint or raise a concern about any aspect of the operations and business activities of the RMIT Group. A third party for the purposes of this procedure is any person not eligible to raise a complaint under the various staff and student policies and procedures. Authority for this document is established by the Complaints Governance Policy.

Policy	Context and relevance to modern slavery
Controlled and Non-Controlled Entity Policy	Establishes the governance framework for the University's controlled and non-controlled entities to ensure the University operates in accordance with its obligations under the RMIT Act and that the RMIT University Council has appropriate oversight of all functions and activities conducted by entities.
Inclusion, Diversity and Equity Policy	Sets out our commitment to providing an accessible and inclusive learning and work environment that promotes diversity, inclusion and equal opportunity and is free from discrimination, sexual harm, victimisation and vilification.
Procurement and Expenditure Policy	Ensures all procurement and expenditure activities support RMIT's strategic objectives, comply with legislative and regulatory requirements, and include consideration of quality, service, environmental and social impacts. Making explicit reference to the *Modern Slavery Act 2018* (Cth), this policy strengthens oversight of the RMIT-controlled entities to ensure greater compliance, risk management and governance.
Risk Management Policy	Sets out the key principles and expectations to support the effective management and oversight of risks to the RMIT Group strategy, objectives, and activities, and promote transparency and integrity in the RMIT Group decision-making processes.
Supplier Code of Conduct	Outlines our minimum requirements regarding the conduct of our suppliers of goods and services in the areas of labour and human rights, protection against modern slavery, environmental management, health and safety, corporate governance, and ethical business practices.
Sustainability Policy	Articulates RMIT's commitment to advancing its sustainability ambitions as an organisation that models institution-wide excellence. Ensuring our strategies, processes, supply chains and partnerships meet fundamental responsibilities in the areas of human rights, labour, environment and anti-corruption to achieve a culture of integrity. The policy explicitly requires RMIT to assess and address the risks of modern slavery in our operations and supply chains through due diligence and remediation processes, as well as implementing tools to assess the effectiveness of these actions. The 2024 update moved this policy from the 'Talent and Culture' category to the 'Governance' category which meant it had to be approved by the RMIT Council. **Corporate Social Responsibility Framework** The framework, an asset under the Sustainability Policy, provides a screening methodology and a range of tools to identify individuals, businesses or organisations that may pose an ethical or reputational risk to the University. allows us to implement appropriate risk mitigation and meet our CSR obligations as a signatory to the Compact.
Third-Party Educational Delivery Policy	This new policy and its associated processes establish the principles for the delivery of RMIT programs and courses by third-party providers. It ensures that RMIT complies with relevant Australian and foreign jurisdiction (where applicable) legislation, regulatory requirements and standards for all programs being delivered through third-party arrangements and has responsibility to ensure that third parties comply with all legislative and regulatory requirements, including the Modern Slavery Act and broader human rights due diligence.

Risk Management

RMIT's risk management framework establishes a systematic process of identification, management and monitoring of risk.

RMIT fosters a positive risk aware culture. Risk is everyone's responsibility and is embedded in the way work is conducted across all RMIT Group academic, research and non-academic operations. It encourages open and transparent discussion about risk and opportunity.

Modern slavery risks within the University's operations, entities and supply chains are considered in numerous risk domains, including sustainability, property, education, technology and procurement risk domains.

Subject matter experts across the University continually engage with key external sources, external advice and peer practice, through groups like the Australian Universities Procurement Network (AUPN), to inform their active management and review of key risks.

The risk management framework is supported by:

- A defined Risk Management Policy based on ISO31000:2018 Risk Management, that articulates RMIT's approach to risk management and the key principles and responsibilities required to facilitate the effective management of risks.

- Council-appointed Audit and Risk Management Committee (ARMC) which regularly monitors and reports on the adequacy of arrangements in place to ensure that risks are effectively managed and reflective of the strategy across the group.

- An annual review and update of the RMIT Risk Appetite Statement (RAS). The RAS contains several risk tolerance statements which articulate the University's strong stance on a culture of compliance, alignment to values and due diligence, which underpins our approach addressing to human rights and modern slavery.

- Risk is a life cycle: Risks change over time. Risks are monitored, reviewed and assured to ensure RMIT's position remains relevant and appropriate, and in line with our risk appetite.

- The World Economic Forum (WEF) publishes its annual Global Risks Report to assess the most pressing global threats in the short and long term each year. The Enterprise Risk Management Team provides the ARMC with a high-level analysis of the WEF Global Risks Report each year to determine any material shifts or impacts across our risk domains.

- Active management and monitoring by all Colleges, Portfolios and Controlled Entities of their risk profiles to ensure that appropriate mitigation measures are in place and risk exposures remain consistent with RMIT's objectives.

- Provision of risk management support, advice, assessment tools and training for RMIT staff with a formal Risk Champion Forum in place.

- Nominated Risk Champions in each of our Colleges, Portfolios and Controlled Entities who play an important role in risk management across the University. Champions are responsible for supporting their respective business area in applying enterprise-wide risk management processes and techniques with the aim of increasing awareness, ownership and management of risks leading to improved business performance.

- Execution of the annual internal audit plan, which is primarily concerned with evaluating the effectiveness of internal controls and is risk-based to place greater emphasis on those areas of higher risk to RMIT.

- An insurance program that protects RMIT from financial impacts as a result of physical loss of, or damage to, assets and activities, as well as injuries to RMIT staff, students and third parties.

Third Party Due Diligence

Third parties can be engaged by RMIT for numerous reasons and through varied pathways. Examples of third parties include new suppliers, new research partners, new Work Integrated Learning (WIL) partners and new philanthropic partners. It is critical that any risks introduced by these third parties are evaluated in a timely and accurate manner utilising the input of all relevant subject matter experts and a consistent risk assessment methodology.

Throughout this Statement due diligence processes are outlined to demonstrate how modern slavery risks are screened and managed by a range of functional areas.

One such example is the Global Partnership Approval Process.

The **RMIT Global Partnership Approval Process** (GPAP) plays a crucial role in maintaining the University's high standards and delivery of strategic objectives for partnerships across the RMIT Group.

The GPAP is a high-level due diligence assessment which helps to ensure that proposed partnerships align with our strategy and values and do not present significant risk to RMIT, as guided by the RMIT Group Risk Appetite Statement.

With the implementation of the new Third-Party Educational Delivery Policy from 1 July 2024, the GPAP was expanded to cover domestic education delivery arrangements.

The GPAP assesses modern slavery risk at both the country engagement level (referencing sites such as the Global Slavery Index, Human Rights Watch and Amnesty International) and partner engagement level (via checks for current modern slavery policies and/or statements on the proposed partner websites), with additional information and assurance requested directly from the partners if required. The GPAP findings are documented and submitted to the Executive Director, International for review and approval. Proposals are not approved where the GPAP has raised significant concerns, or where the proposed partnership or engagement does not meet the criteria of the RMIT Group Risk Appetite Statement.

The International team is responsible for conducting the GPAP, which must be completed before formal agreements can be arranged with third-party partners – both domestically and outside of Australia.

Over the next two years, the Risk Team will lead a project to streamline third-party due diligence. The team will design, implement and facilitate the embedment of a consistent process in assessing risks arising from significant new third-party activities across the organisation, allowing for risks to be identified and be managed adequately in line with the University's Risk Appetite.

Modern Slavery Roadmap

The **Sustainability Committee** has the responsibility and operational oversight for the coordination of sustainability initiatives across all areas of the University. Its goal is to ensure sustainability principles and practices are embedded within the University's core teaching and learning, research, governance and operational activities.

The Sustainability Committee reports through the Chair (the Deputy Vice-Chancellor, Education) to the Vice-Chancellor's Executive on the University's sustainability performance and makes recommendations about sustainability-related commitments, policies, planning and partnerships. It is also responsible for oversight of the University's commitment to the UN Sustainable Development Goal and compliance with the Modern Slavery Act.

The RMIT Modern Slavery Roadmap aligns with the expectations for business to respect human rights set out in the UN Guiding Principles on Business and Human Rights (UNGPs). The roadmap identifies a suite of applied practical actions the University can take over the short, medium and long term to further improve and refine our modern slavery risk management.

The actions were developed through consultation with key business units and sit across the following categories:

- policy commitment
- identifying and assessing risks
- integrating responses and addressing risks
- tracking effectiveness
- communicating actions, and
- grievance mechanisms and remediation.

2024 marked the first full year of implementation for the RMIT Modern Slavery Roadmap, with a range of key initiatives undertaken. These included:

- Tender and supplier registration processes were streamlined to ensure tenderers and new suppliers understand their modern slavery and CSR obligations, with all medium to high-risk suppliers required to complete a comprehensive CSR questionnaire.
- New procurement guidance, including a triage matrix, was introduced to support the identification and management of modern slavery risks in procurement activities and contracts.
- A global, centralised complaints management system was launched, providing a public-facing digital platform for anonymously lodge complaints regarding allegations of modern slavery breaches.

The Sustainability Committee actively monitors this work and has been engaging with subject matter experts from across the University and with external human rights experts to support the implementation.

Our people

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Staff

RMIT employs just over 12,000 staff globally, comprising a workforce of professional and academic staff.

Australian onshore staff, including those employed by RMIT University, RMIT UP (RMIT Training) and RMIT Online, are based at one of our three campuses in Melbourne – Melbourne City, Brunswick and Bundoora. All RMIT University and RMIT UP staff are covered by Enterprise (Collective) Bargaining Agreements.

As at 31 December 2024, RMIT's Australian entities had 4,368 continuing, 1,371 fixed term and 4,964 casual staff.

In terms of gender breakdown RMIT's Australian entities are represented by 5,879 females (54.9% of headcount), 4,680 males (43.7% of headcount) and 144 other gender categories (1.4% of headcount).

When considering worker types across RMIT's Australian entities, 5,324 were academic staff teaching in higher education, undertaking research and engaging with industry, 1026 were vocational education teachers, and 4,353 were professional staff supporting both the operation of the University, and academic and vocational education activities.

Enterprise Agreements

In 2024, RMIT was in active bargaining for two new agreements: the *RMIT University Enterprise Agreement 2024* for academic and professional staff members and the *RMIT University Vocational Education Enterprise Agreement 2024* which covers all vocational education teachers and senior educators.

RMIT's goal is to have enterprise agreements that reward and recognise our staff, address their needs and concerns, provide new and enhanced benefits and conditions and are sustainable in supporting the University through our next phase of growth.

We are pleased that both agreements were supported by the overwhelming majority of employees who voted 'yes' for their relevant agreement.

The *RMIT University Enterprise Agreement 2024* was endorsed by academic and professional staff in mid-October and received formal approval by the Fair Work Commission in late November. The new agreement commenced operation on Friday 29 November 2024.

The *RMIT University Vocational Education Enterprise Agreement 2024* was endorsed by vocational education staff in mid-November and received formal approval by the Fair Work Commission in early January 2025. The new agreement commenced operation on Wednesday 15 January 2025.

For more information on the benefits included in the new agreements see the **RMIT Annual Report**.

RMIT Vietnam operates across three locations: with campuses in Ho Chi Minh City (Saigon South) and Hanoi, and an English Language Centre in Danang.

RMIT Vietnam's workforce is comprised of two employee types, definite (fixed term) and indefinite (continuing), in accordance with the Vietnam Labour Code 2019. Fixed term and continuing are salaried staff while our casual employees are paid an hourly rate.

As at 31 December 2024, RMIT Vietnam had 327 continuing, 743 fixed term and 282 casual staff.

At RMIT Europe (based in Barcelona, Spain), 40 employees in Spain were engaged as either permanent/ongoing, training contracts, or under internship agreements. All employment contracts are issued in accordance with the Spanish National Collective Agreement for Private Universities and in compliance with Spanish labour laws, under which very few situations for temporary employment are allowed.

Area of risk

The inherent level of modern slavery risk within our operations for directly employed staff in Australia is deemed low, given the workplace protections in place that comply with applicable labour rights legislation and the types of roles typically undertaken by our people. A comparable approach is taken for our staff in Vietnam and Spain.

Information on the protections in place for our workforce is described in the following section.

Actions taken

- All Australian onshore employees are covered by either an applicable Enterprise Agreement or the relevant modern award and we work to ensure compliance with our obligations under relevant employment legislation, such as the *Fair Work Act 2009* (Cth).
- Labour contracts for RMIT Vietnam's employees are prepared by our People Team (Human Resources) using templates created in accordance with the prevailing Labour Code and reviewed by an independent legal advisor. All agreements comply with Vietnam labour rights legislation, including the labour code, statutory insurance and tax laws. We continue to provide worker benefits that exceed legislative requirements under the Vietnam Labour Code 2019.
- RMIT Spain's employment contracts are prepared by a third-party provider, and all current contracts have been prepared in accordance with the Spanish National Collective Agreement for Private Universities and are compliant with Spanish labour laws. Due to recent legislative changes in Spain, RMIT Spain can only issue temporary employment contracts for very limited reasons, e.g. maternity leave cover.

Students

In 2024, RMIT had 99,268 students enrolled globally.

Beyond involvement in their course of study, our student population may be engaged in other activities, either as a component of their study or as volunteering. This may include involvement in Work Integrated Learning (WIL) programs, work experience, internships or volunteering. Volunteering can include participation in one of our clubs, societies, collectives or as part of a community project or event.

RMIT prides itself on being a unique institution whose reach extends beyond its campuses in Melbourne and Vietnam, with programs offered through partners in Singapore, Hong Kong, Sri Lanka, Indonesia, India and China, with research and industry partnerships across the globe.

Area of risk

The risk of modern slavery among our student population is not deemed high overall. However, there are risk factors arising from the activities of our student body that may give rise to substandard treatment, including their involvement in WIL programs, unpaid work experience, internship arrangements and volunteering.

We understand that in such situations, students may not be afforded the same protections as those provided under an employer-employee arrangement and that there is a potential for exploitation.

We also recognise that students may undertake work with third parties not connected to their studies (such as part time work) and that this may involve risks of exploitation. These risks may be heightened for international students who may not be aware of their workplace rights and help seeking pathways.

We also acknowledge that we have a role to play in educating students that may take up future careers in sectors that are at high risk for modern slavery (such as sectors that may rely on higher risk goods or services). Engaging with these students during their time at university can help ensure they are aware of how modern slavery might occur in these sectors and position them to drive change.

Actions taken

To manage the risk of substandard treatment of students, we continue to maintain a number of practices:

Work Integrated Learning (WIL) programs

Partner screening – all prospective WIL partners and other relevant third-party organisations are screened via a due diligence form designed in consultation with Legal and the central Health, Safety & Wellbeing (HSW) team to assess their appropriateness and legitimacy. For student experience programs, a third party is used to identify partners and allocate students to these partners.

Industry partner due diligence has been implemented across all Colleges. RMIT requires all new WIL industry partners to complete the WIL due diligence form prior to signing the WIL agreement. A discipline-based, risk assessment process has been developed to identify and assess any industry-specific requirements, which provides an opportunity to look at specific sectors that are at high risk of modern slavery.

Partner agreements – the WIL Partner Agreement defines the partner's responsibility for student welfare, including the provision of a safe and secure working environment.

Volunteering programs and activities

The RMIT Students Group supports best practice management of university volunteering programs in line with the **National Standards for Volunteer Involvement**, Volunteering Australia.

This approach utilises the application of quality assurance instruments including:

- A Student Volunteering definition, Volunteer Agreement and Volunteer Activity Descriptions endorsed by RMIT Legal.
- A Volunteer Program Management Health Check.
- Standardised 'Volunteer Training' covering volunteer rights, responsibilities, volunteer and child safety, conduct and privacy policy, communication, inclusion and accessibility, wellbeing and support information.

Further activities relating to the Student Volunteer program endorsement, evaluation and volunteer recognition are continuously delivered as BAU and monitored via the Student Volunteer Community of Practise and Steering Group.

RMIT Student Clubs

The RMIT Clubs Program cultivates community, fosters skill development, and facilitates networking and connection building for students and RMIT members through diverse activities. Skill and professional development are offered and aligned with RMIT's active, applied and authentic pedagogical approach.

Although the University has not directly engaged with our student clubs on the issue of modern slavery to date, there are a range of processes in place to ensure they are supported to operate safely, respectfully and in compliance with RMIT policy, these include:

- **Incident Reporting:** Clubs and their leaders are encouraged to report any incidents, including near misses, via the RMIT SafetyNow portal for effective management and risk mitigation.
- **Risk Management:** Student Life club events and activities are registered and approved by RMIT staff to ensure compliance with university rules. This includes submitting attendee lists with emergency contact information and appropriate risk assessments.
- **Safer Community:** Club leaders are briefed and encouraged to report any unwanted behaviours to the RMIT Safer Community team.

Future improvements include:

- In 2025, a Student Life Club Member Code of Conduct will be introduced. This will outline the incident reporting procedures and expected behaviours for club leaders and members.
- Currently, Student Life clubs can purchase merchandise from a variety of suppliers. These items are not subject to the same level of supplier screening as those directly purchased by RMIT. The introduction of a standard payment system in early 2025 will allow for better tracking of these purchases, providing insights into sales and purchasing patterns.

RMIT Global Learning

RMIT Global Learning engages third-party providers to support students spending time overseas. Contracts and agreements are in place to ensure that the health, safety and wellbeing of our students is paramount during their global experiences, these include:

- International Student Exchange Agreement
- Third Party Provider Agreement
- Work Integrated Learning Agreement

All students undertake a compulsory 'Preparing for Learning Abroad' training module in which they are supported to create a safety plan in preparation for any unforeseen incidents while overseas. The module includes how to respond in the event of a travel or safety incident, how to maintain good health while abroad and responding to a medical emergency. International SOS are engaged to provide 24/7 support to students if they need urgent assistance overseas.

Any new partnership goes through the Global Partner Approval Process (GPAP), with extensive due diligence undertaken to understand country and partner risks and to ensure partners have strong values alignment with RMIT.

Our supply chain

5

Context

As one of Australia's largest tertiary institutions, RMIT has a significant impact through the University's operational footprint and supply chain. This allows the University to leverage its buying power to drive improved practices in the supply chain and support the strategic objective of contributing to the communities we serve.

Guided by the RMIT Procurement Policy and Procedure, RMIT integrates sustainability considerations into its procurement practices including processes, responsibilities and governance. The University's approach to sustainable procurement is aligned with the international standard, ISO 20400:2017 Sustainable Procurement – guidance (ISO 20400). The standard defines sustainable procurement as "procurement that has the most positive environmental, social and economic impacts possible over the entire life cycle".

RMIT has a sector-specific supply chain to procure the goods and services needed to conduct our activities, which includes our entities outside of Australia.

Throughout this statement, Tier 1 in our supply chain represents the supplier with whom we have a direct relationship – we directly purchase goods and services from them. Tier 2 represents the suppliers of our Tier 1 supplier(s), Tier 3 represents the suppliers of Tier 2, and so on. We maintain formal and long-standing relationships with our contracted suppliers and undertake regular reviews of supplier relationships and contracts on an ongoing basis.

Through our Workday procurement platform, we have been able to present our total Tier 1 supplier spend for 2024, including Vietnam and Europe. This new way of reporting provides a more consistent methodology and transparency across our entities, and more granular data than was provided in our previous statements.

In 2024, RMIT engaged directly with 4,930 distinct Tier 1 suppliers across all entities (suppliers may be engaged by multiple entities).

Figure 1 – Number of Tier 1 Suppliers by RMIT Location

Entity	Number of suppliers			
	2021	**2022**	**2023**	**2024**
RMIT AUS	2,906	3,587	3,724	3910
RMIT VTN	599	834	894	898
RMIT Spain	67	113	111	122

Figure 2 – Total Spend by RMIT Location

Entity	Total Spend AUD			
	2021	**2022**	**2023**	**2024**
RMIT AUS	$395,650,062	$391,126,660	$438,018,330	$438,062,629
RMIT VTN*	$19,251,002	$20,419,165	$48,091,943	$48,715,619
RMIT Spain*	$502,051	$1,090,260	$1,088,502	$1,527,465

*These figures are based on date of invoice issued, and include total supplier spend across CAPEX and OPEX. They may be slightly different to the RMIT Annual Report due to pre-payments and accruals. RMIT Vietnam and RMIT Spain spend data is captured in AUD, with currencies converted from VND and EUR based on the average exchange applicable for the relevant calendar year.

Figure 3 – RMIT Percentage of Total Spend by Region (includes all entities)

Region	Percentage Spend			
	2021	**2022**	**2023**	**2024**
Australia	82.67%	80.29%	78.46%	79.62%
Asia	6.52%	12.01%	13.92%	13.91%
Europe	3.99%	3.92%	3.38%	3.49%
North America	6.53%	3.67%	4.09%	2.91%
Oceania (inc NZ)	0.28%	0.07%	0.10%	0.03%
Africa	0.01%	0.02%	0.02%	0.03%
South America	0.00%	0.02%	0.03%	0.01%

In 2024, approximately 79.62% of our overall spend across all entities was paid to suppliers based in Australia. The above spend-by-country map reflects RMIT campus activity and the suppliers' registered domicile, covering student recruitment agencies, partner institutions, publishers and scientific equipment suppliers.
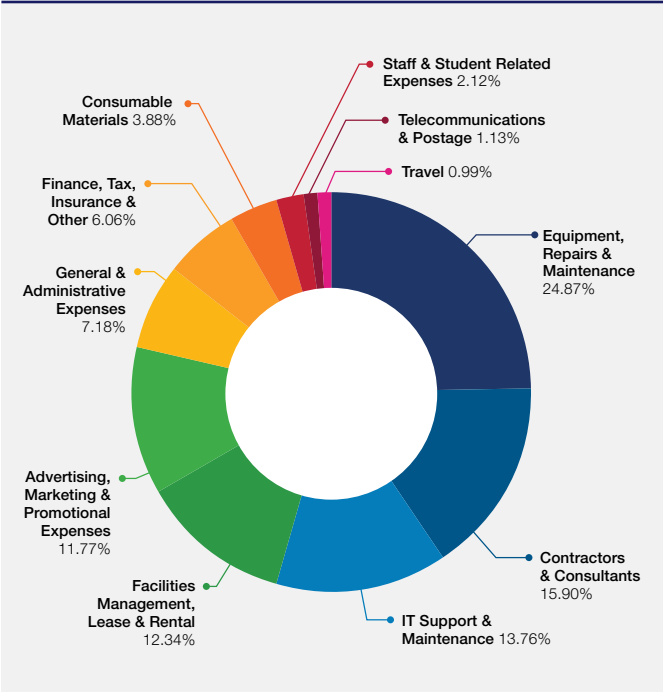
RMIT takes a risk-to-people approach, recognising that supplier spend does not correlate to modern slavery prevalence and that the risk of modern slavery may be present even in our smallest suppliers.

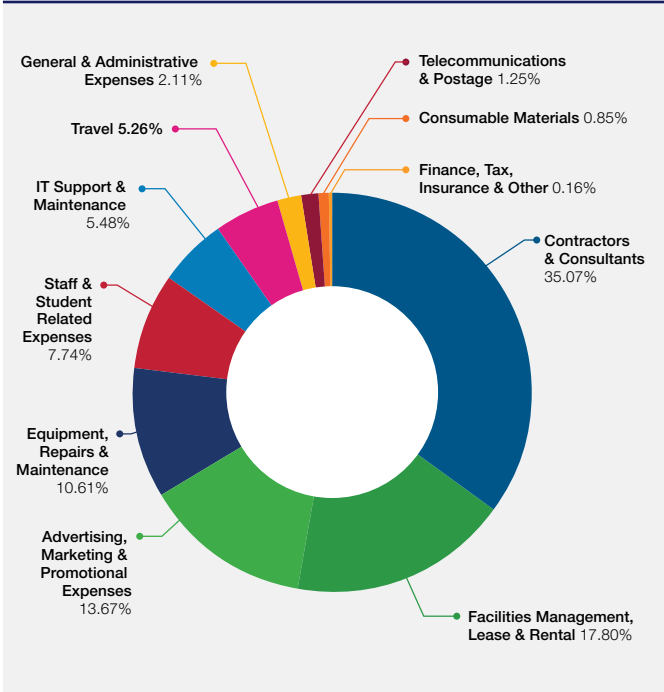Our supplier expenditure is ordered by spend categories, which are explained below:

Spend category	Description
Advertising, Marketing & Promotional Expenses	Promotional, media, marketing and event management expenditure.
Consumable Materials	Office consumables, printing, lab supplies and educational materials.
Contractors and Consultants	Includes those providing professional services to RMIT.
Equipment, Repairs & Maintenance	Property and building maintenance, equipment and IT hardware.
Facilities Management, Lease & Rental	Facilities management and leasing, including cleaning, waste removal, utilities, security services and car park management.
Finance, Tax, Insurance & Other	Banking, insurance and investment management.
General & Administrative Expenses	Document management and storage as well as items such as memberships and subscriptions.
IT Support & Maintenance	IT software licensing and managed services.
Staff & Student Related Expenses	OHS support, professional development and awards.
Telecommunications & Postage	Freight, logistics, postage, storage and telecommunications.
Travel	University travel requirements, such as flights, hotels and car hire.

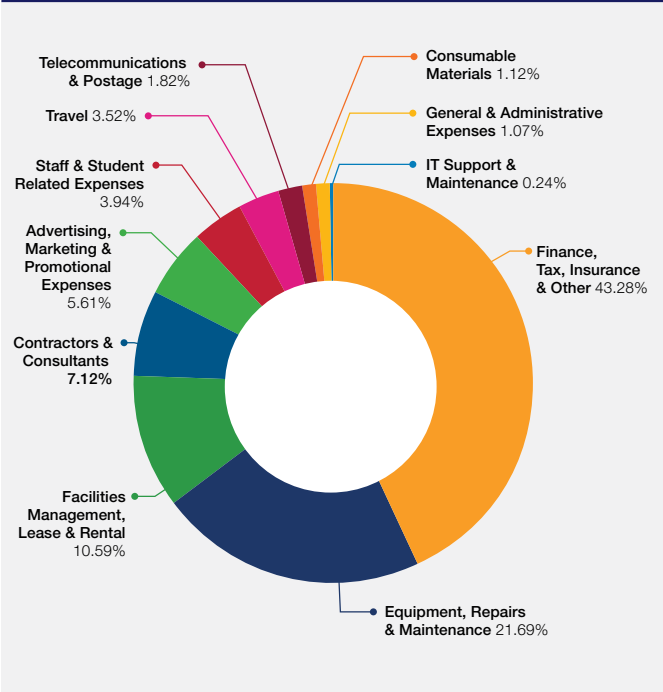Below is the spend data by category for each RMIT entity:

RMIT Australia

- Staff & Student Related Expenses 2.12%
- Telecommunications & Postage 1.13%
- Travel 0.99%
- Consumable Materials 3.88%
- Finance, Tax, Insurance & Other 6.06%
- General & Administrative Expenses 7.18%
- Advertising, Marketing & Promotional Expenses 11.77%
- Facilities Management, Lease & Rental 12.34%
- IT Support & Maintenance 13.76%
- Contractors & Consultants 15.90%
- Equipment, Repairs & Maintenance 24.87%

RMIT Spain

- General & Administrative Expenses 2.11%
- Travel 5.26%
- IT Support & Maintenance 5.48%
- Staff & Student Related Expenses 7.74%
- Equipment, Repairs & Maintenance 10.61%
- Advertising, Marketing & Promotional Expenses 13.67%
- Telecommunications & Postage 1.25%
- Consumable Materials 0.85%
- Finance, Tax, Insurance & Other 0.16%
- Contractors & Consultants 35.07%
- Facilities Management, Lease & Rental 17.80%

RMIT Vietnam

- Telecommunications & Postage 1.82%
- Travel 3.52%
- Staff & Student Related Expenses 3.94%
- Advertising, Marketing & Promotional Expenses 5.61%
- Contractors & Consultants 7.12%
- Facilities Management, Lease & Rental 10.59%
- Consumable Materials 1.12%
- General & Administrative Expenses 1.07%
- IT Support & Maintenance 0.24%
- Finance, Tax, Insurance & Other 43.28%
- Equipment, Repairs & Maintenance 21.69%

Managing our supply chain risks

We acknowledge that while over half of our Tier 1 suppliers are based in Australia, some of these suppliers may have complex supply chains and source inputs from higher-risk geographies. We also recognise that Australia is not immune to modern slavery risks and are committed to also monitoring our onshore suppliers for risks. Due to the limited visibility of our extended supply chain, we recognise the importance of understanding our relationship to potential modern slavery risks, in line with the UNGPs. As such, in identifying our risks, we endeavour to consider whether there is potential that we could cause, contribute to, or be directly linked to modern slavery practices.

Supplier and partner contracts and agreements

Our supplier and partner agreements all include specific clauses on modern slavery, including the University's standard Services Agreement, Licence to Occupy, and Purchase Order Terms and Conditions such as the following:

> The Contractor will, and will ensure that the Contractor's personnel, contractors and agents (Personnel) and the Contractor's Supply Chain Participants:
>
> 1. comply with Human Rights;
>
> 2. notify the Principal promptly and in any event within 10 days of becoming aware of any actual, alleged or suspected breach of this clause by the Contractor, any of the Contractor's Personnel, or any of the Contractor's Supply Chain Participants; and
>
> 3. cooperate with and assist the Principal in relation to any investigation or legal proceedings in relation to any actual, alleged or suspected breach under this clause.
>
> *Human Rights means rights and freedoms that have been universally recognised in international law, domestic law or international declarations or standards which relate to the rights of employees in the workplace including but not limited to those that are set out in The Universal Declaration of Human Rights, The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the rights and obligations enshrined in any Modern Slavery Law.*
>
> *Supply Chain Participant means, in relation to a business, any organisation or individual involved in the chain of production or provision of particular goods or services to that business.*

Localised versions of these contracts are in full use by our controlled entities outside of Australia to ensure compliance with relevant legislation in the respective region.

Current supplier and partner agreements include a right-to-audit clause which RMIT can exercise at its discretion. In 2024, without-notice payslip audits were undertaken on 10% security personnel as well as 20% facilities services direct and subcontractor employees selected at random. No non-compliances against employment contract and award were identified. Changes to awards and sector modern slavery risk issues continue to be monitored and discussed with affected RMIT vendors to ensure the vendors continue to comply with legislative obligations as well as RMIT expectations and their applicable Modern Slavery Statement commitments.

Due diligence processes and procurement systems

The RMIT Procurement Policy and Procedures applicable to the RMIT Group explicitly prioritise compliance with the Modern Slavery Act and commitment to the triple bottom line approach regarding environmental, social and financial sustainability, including labour and human rights principles. All RMIT staff are required to proactively assess the risk profile of any proposed procurement and refer high-risk expenditures to the RMIT Procurement Team.

The RMIT Workday Enterprise Resource Planning System incorporates a common supplier registration process for all new suppliers. A supplier registration form captures key information on each supplier during onboarding, including acknowledgement of RMIT's Supplier Code of Conduct, and requests supplier responses on human rights (including modern slavery), labour standards, and environmental practices. This is then assessed based on sector and geographical risk for modern slavery. The information is made visible in summary format to all staff who use the supplier search function in the Workday system, allowing them to better identify those that have acknowledged the Supplier Code of Conduct and considered their obligations on human rights, labour standards and modern slavery.

Supplier Registration – CSR Questionaire process
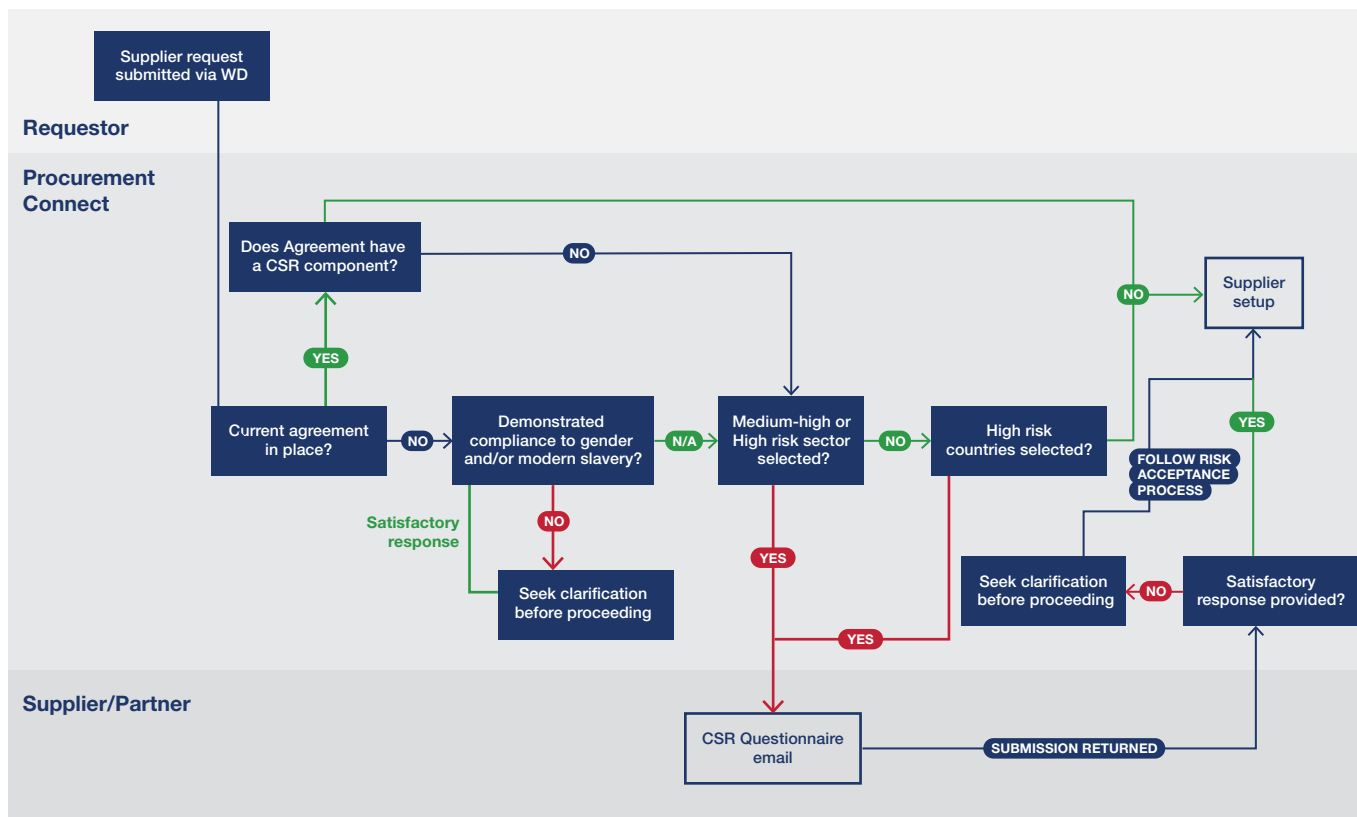
In 2024, 4.2% new supplier registrations were rejected due to suppliers not submitting a completed CSR questionnaire.

The CSR Framework is fully embedded into core procurement process and includes a comprehensive screening process for all prospective suppliers and the signing of the RMIT Supplier Code of Conduct as a requirement of the contract process. The Workday Strategic Sourcing module is in full operation as of 2024 and has strengthened and further standardised processes. Non-panel goods and services subject to tender include a comprehensive CSR screening process and signing of the RMIT Supplier Code of Conduct as a requirement of the contract process. All tenders also have a weighting for sustainability, Indigenous and student engagement outcomes. This module is used across RMIT's global operations.

Sustainability outcomes are also driven through the contract management process with existing vendors.

Sector collaboration

Since 2023, RMIT has been a member of the **Australian Universities Procurement Network** (AUPN), a group which represents the Australasian and New Zealand higher education sectors and works to improve excellence in procurement practice and in the skills of procurement professionals.

Part of the AUPN's offering is the University Anti-Slavery Program. The AUPN is leading a sector collaboration to support member universities to meet the challenge of human rights transparency and risk management in their supply chains and contribute to the fulfilment of *Modern Slavery Act 2018* (Cth) reporting requirements. By working together, it is designed to minimise the duplication of activities and associated costs across individual universities, including risk assessment, implementation of systems and remediation.

As a member of this program, RMIT participates in monthly forums to share best practice and improve capability uplift on the topic of modern slavery. In late 2024, the AUPN enabled RMIT to review our supplier risk profile and data quality against our counterparts in the sector via dashboards and data quality scorecards. In 2025, we will continue to build out our use of the AUPN tools and pilot program outcomes.

High-risk spend categories

The following information outlines the associated example actions undertaken in 2024 to address specific categories of suppliers which have been identified as having a higher risk of modern slavery:

Property Services Vendors – Business as Usual Operations
Inherent modern slavery risks
Property Services vendors are essential to the operation of our campuses. Within the 'Equipment, Repairs & Maintenance' and 'Facilities Management' spend categories, a variety of Property Services vendors are engaged on an ongoing basis to support on-campus operations. These vendors include cleaning services, security, building maintenance, waste management, vertical transport (lifts and elevators), removals and mailroom services. Industries of this nature may pose a key modern slavery risk relevant to service procurement, where personnel may be subject to the withholding of wages, immigration-related coercion and threats, debt bondage, confiscation of personal and travel documents, and dangerous and substandard working conditions.
Examples of actions taken
In 2024, RMIT Australia appointed a single vendor to be fully responsible for campus security and electronic security arrangements. The contract has express contractual obligations built upon from the previous campus security contract, including provider obligation to comply with regulatory requirements, particularly anti-slavery provisions, RMIT right to audit and no subcontracting without RMIT pre-approval. RMIT Vietnam has similar labour obligations on its Property Services vendors, and plans to expand its vendor panels to cover scope such as Mechanical Electrical and Plant repairs and maintenance in 2025 to further improve compliance and monitoring.

Property Services Vendors – Construction (labour and materials)

Inherent modern slavery risks

Construction work performed in upgrading and constructing new buildings may present risks of modern slavery. The construction industry can be vulnerable to sub-standard working conditions, poor safety practices and worker exploitation. The risks may be driven by the construction industry's competitive bidding process and post-pandemic labour shortages.

In addition, construction companies may source materials from countries considered at a higher risk of modern slavery.

Examples of actions taken

Property Services has a range of panels in place to provide access to pre-qualified suppliers for building services, construction, hazardous material removal and furniture supplies.

Centralised management of Property Services vendors and supplier panels includes the RMIT Australia Builders and Minor Works Panel, in which members prequalified for refurbishment and construction projects under $10M are subject to demonstrated continual compliance with panel agreements including the upholding of labour standards and modern slavery risk minimisation. The Panel's scope and membership have been expanded to minimise the risk of non-panel appointments which in turn reduces the risk of unscrutinised supply chain and employment arrangements.

The vendor on the current solar panel provision project in RMIT Australia is obliged to report on its progress in managing high risk labour and supply chains via its Modern Slavery Statement. It has a direct relationship with a primary manufacturer and has panel traceability reports from this supplier which provide assurance that solar panels are being manufactured outside the Xinjiang Uyghur Autonomous Region. As an additional risk management process, the vendor has continued regular manual screening of the Uyghur Forced Labor Prevention Act (UFLPA) Entity List and media reports to remain abreast of any specific linkages between its primary solar supplier and allegations of forced labour risks.

Electronics and IT hardware (computers, audio-visual, etc.)

Inherent modern slavery risks

The use of electronics is essential for students and staff during our everyday operations, including the use of computers, projectors, audio-visual equipment, and associated networking and peripheral devices on our campuses. Electronics and hardware have a high modern slavery risk, most prevalent in the raw material extraction that occurs to supply the electronics industry, including the mining of conflict minerals, where workers may be subject to dangerous and life-threatening working conditions.

The risk of modern slavery is also present during the manufacture of electronic goods in high-risk geographies, where forced labour or other modern slavery practices may be present.

Actions and Developments

The procurement process for electronics and IT hardware follows our organisation-wide due diligence procedures and screening for suppliers that may have indicators of higher modern slavery risk. The Agreements for the supply of IT and audio-visual hardware give RMIT the right to audit to ensure ethical employment and legislative rights are fully complied with, including labour standards and modern slavery obligations.

In 2024, RMIT's computer hardware provider was acquired by CHG-Meridian, which is subject to the UK & European Union Modern Slavery laws including annual public reporting on its work in mitigating against modern slavery and human rights violations. RMIT will work with the provider in 2025 to gain better supply chain visibility and reporting on its compliance with labour standards and modern slavery obligations.

IT development and hosting services

Inherent modern slavery risks

As a technology-driven university, we continue to rely on hosted IT services, including learning and administrative platforms. As such services are often hosted and supported overseas, the risk of exploitation and mistreatment for offshore technology providers is present in these sectors, including IT development, hosting and support.

Examples of actions taken

Acting on the modern slavery risk indicators present in IT development and hosting services, we prioritise using RMIT terms and conditions incorporating CSR and modern slavery standards in new and renewing IT suppliers. Where the vendor's terms and conditions are utilised instead, we require RMIT standards to be incorporated. Audit clauses are now incorporated in all new contracts. Since 2022, RMIT's core hosting arrangements have been via the Australian Government. Most IT development resources used by RMIT are now either internal teams or in Australia subject to compliance with Australian laws. Where offshore resources are utilised, the vendor is required to get RMIT pre-approval, keep records demonstrating compliance with Australia's modern slavery laws and notify RMIT within 10 days in the event of any actual, suspected or alleged breach.

Laboratory supplies, office supplies and furniture

Inherent modern slavery risks

In many areas of campus operations, we utilise products such as laboratory and classroom supplies (e.g. rubber gloves, chemicals, paper, and stationery) as well as equipment for ongoing use (e.g. tables, chairs, desks, and other furniture). The manufacturing of the associated input materials has a high risk of modern slavery as they may include forced labour, child labour and more broadly, instances of sub-standard and exploitative labour conditions, where informal and unregulated suppliers are common.

These risks may come from activities such as the harvesting of natural rubber for glove production, and the cultivation of plants and timber used in furniture and paper processing.

Examples of actions taken

The RMIT Lab Consumables Panel Agreements set up in 2024 explicitly require that suppliers ensure their own suppliers also comply with the RMIT Supplier Code of Conduct, relevant human rights and modern slavery obligations. RMIT has the full right to access and audit operations and records to verify compliance. The new Panel's scope and suppliers have widened in comparison to the last Panel to minimise off-panel lab consumables purchases and therefore suppliers at risk of contravening Australian modern slavery laws.

Any off-panel lab consumables purchases are subject to CSR due diligence per the supplier registration process.

The RMIT Furniture Panel ensures that only furniture which complies with the RMIT Furniture Standards is supplied to the University. The Standard requires furniture to meet a range of sustainability rating/certification schemes, which take into account CSR, labour standards and modern slavery risk management. Where builders and architects propose alternative furniture not available from the RMIT Furniture Panel, the alternative furniture supply arrangements are also subject to the RMIT Furniture Standards.

RMIT Australia and RMIT Vietnam respectively have a single, whole-of-university supplier for office supplies and stationery to ensure products are ethically and sustainably sourced. The Agreement explicitly requires that as a Tier 1 supplier, their suppliers also comply with the RMIT Supplier Code of Conduct, relevant human rights and modern slavery obligations. RMIT has the full right to access and audit operations and records to verify compliance.

The existing centrally managed agreements for printing services incorporate similar human rights and modern slavery risk management obligations. In 2024, RMIT Vietnam went to market to assess whether a panel or single provider arrangement is the optimal solution for RMIT Vietnam from 2025 onwards.

Clothing and merchandise

Inherent modern slavery risks

The RMIT Store owned and operated by the University is responsible for providing a range of official branded clothing, accessories and course equipment which is sold online and on campus. Despite a small category of spend, the items sold remain highly visible and are produced by third-party clothing and textile manufacturers locally and offshore.

Some products sold through the RMIT Store may carry modern slavery risks due to the involvement of third-party sourcing of materials and manufacturing as well as the risk of practices such as unauthorised subcontracting.

Examples of actions taken

The RMIT Store continues to utilise strong supplier screening practices and onboarding requirements. Information and evidence is required beyond Tier 1 suppliers, including supplier audit reports and corrective action plans.

The ethical sourcing practices of the RMIT Store have been uniquely tailored to the size, scale and types of goods sold in the Store and the values of the University. These practices have been developed to mitigate against the risk of forced and slave labour of the goods sold and are in addition to the broader due diligence requirements embedded into standard procurement. In 2025, the Store aims to move supplier screening to an online process, which should help streamline submissions and improve collection rates over time.

More broadly, sustainability outreach and engagement with students through key events such as Sustainability Week and Fashion Revolution speak to how students can buy ethically.

Directly procured food and beverages (RMIT kitchens, tea points and meeting rooms)

Inherent modern slavery risks

RMIT has kitchens, tea points and meeting rooms that provide beverage supplies such as tea, coffee and sugar. Food procurement may present a risk of forced labour and instances of sub-standard and exploitative labour conditions in supply chains and during processing.

Examples of actions taken

As a Fair Trade University since 2009, RMIT preferences Fairtrade certified products which maintain third-party certification providing for fair and equitable protection of food producers. This is in addition to our standard procurement due diligence processes. We continue to work with our stationery suppliers (who supply this category) to ensure we encourage local buyers across RMIT to select these products.

On-campus retailers

Inherent modern slavery risks

Retail and hospitality industry workers can be vulnerable to sub-standard working conditions and underpayment of wages, due to industry-specific factors driven by the casual and seasonal nature of this work. Certain goods, which may be sold by retailers, such as seafood, dried fruit and nuts, coffee, palm oil, cocoa, coconut and rice are also at high risk of forced labour, human trafficking and debt bondage.

RMIT leases space to external vendors who operate on-site to sell food and beverages. These vendors are treated as RMIT tenants and therefore operate outside of our centralised procurement practices.

Examples of actions taken

Contractual arrangements are in place with on-campus retailers via our Licence to Occupy agreement. The templates now refer to a general obligation for licensees to comply with all applicable laws and there is a specific schedule attached to our licenses which calls out compliance with the RMIT Supplier Code of Conduct, Sustainability Policy and sustainability commitments, including Fair Trade.

Actions taken across other procurement categories

RMIT's new Academic Dress Supply Agreement enforces audit rights, modern slavery and human rights management obligations on the vendor. The vendor sources RMIT gowns and accessories from a Victorian-based wholesaler who supplies to other major Australian fashion retailers. The wholesaler provided clear information on its Chinese supply chain conditions and has committed to providing RMIT further information during the Agreement, including updates on its setting up a parallel supply chain in India to ensure all modern slavery and labour rights obligations are met.

Philanthropic & Other Investments

About

RMIT Philanthropy connects our community of supporters – donors, staff, alumni, industry partners and students – with University initiatives they are passionate about, to deliver strategic funding and support that advances RMIT's ambitions.

In 2024, AUD$3.6 million was spent supporting 1,396 students through scholarships, prizes and travel grants. A further AUD$18,000 in philanthropic funding was provided to help students experiencing hardship to continue their studies and a further AUD$26,000 raised in the end-of-year appeal to help with hardship in 2025. In 2024, AUD$2.6 million was raised to support research, including AUD$751,000 in Higher Education Research Data Collection (HERDC) funding categorised as philanthropic.

The RMIT Responsible Investment Principles guide the University's investment managers to ensure the portfolio minimises activities that have a material impact on climate change, including involvement in fossil fuels, while screening for issues relating to public health and wellbeing.

As at 31 December 2024, RMIT held $151.2 million across two funds managed by Russell Investments, with $82.7 million held in the Philanthropic Fund and $68.5 million in the Long Term Investment Fund. Both funds follow an identical strategic asset allocation, comprising equities, bonds, and cash. Importantly, 100 per cent of the equity component across both funds is invested in two responsible investment products.

- **Russell Investments Sustainable Global Shares ex Fossil Fuels Fund:** a fund that invests in a broad range of global shares, designed with Russell Investments' robust decarbonisation strategy and excludes companies with fossil fuel reserves, as well as companies with significant involvement in fossil fuels. In addition to the decarbonisation strategy, other controversial industries are excluded, and the portfolio is positively tilted towards companies with higher-than-average material ESG scores reflecting best practice in sustainable investing.
- **Russell Investments Australian Responsible Investment (RARI) ETF:** a fund that invests in Australian shares and trusts listed on the ASX that also excludes companies with fossil fuel reserves. The fund is weighted towards companies that demonstrate positive ESG characteristics after negatively screening for companies that have significant involvement in a range of controversial activities. RARI has been certified by Responsible Investment Association Australasia (RIAA) to the strict operational and disclosure practices required under the Responsible Investment Certification Program.

Inherent modern slavery risks

There is a level of risk of modern slavery within the underlying asset holdings of any investment product. The combined modern slavery risk profile across the underlying assets is complex, with many of these assets being exchange-listed companies with global operations and international, multi-tiered supply chains. Some of these companies are required to produce a modern slavery statement under the Act, with this level of reporting providing greater transparency of asset-level modern slavery risk programs to investors.

Actions Taken

The University invests through a 'pooled funds' structure, where investments are not directly held by RMIT. Pooled funds are those where there are several different types of investors whose money is 'pooled' and invested together.

The use of pooled funds means that direct investment decisions, such as whether to buy shares in an individual company are not made by the University. Instead, RMIT works with an asset consultant to set parameters on the Environmental, Social and Governance (ESG) impacts of its investments. The asset consultant then assists the University in finding suitable investment products that best match the University's ESG parameters.

The **RMIT Responsible Investment Principles** guide our investment managers, to ensure that our portfolio minimises activities that have a material impact on climate change, including involvement in fossil fuels, while screening for issues relating to public health and wellbeing, including human rights and modern slavery. We monitor the portfolio in relation to globally accepted norms on corporate sustainability behaviours to ensure we meet our commitments to the UN Global Compact.

RMIT also requires our investment managers to be a signatory to the UN Principles for Responsible Investment (PRI). PRI is the world's leading proponent of responsible investment. The PRI works with its international network of signatories to put the six Principles for Responsible Investment into practice. Its goals are to understand the investment implications of ESG issues and to support signatories in integrating these issues into investment and ownership decisions.

RMIT's external investment managers, Russell Investment Management Ltd is subject to the requirements of the *Modern Slavery Act 2018* (Cth). The company publishes an annual Modern Slavery Statement on its **website**.

Russell Investments is required to formally report annually to the RMIT Investment Advisory Group on the actions it has undertaken to address modern slavery. This reporting occurred in March 2024.

Grievance mechanisms and remediation

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RMIT's Whistleblower Procedure is the primary mechanism for anyone wishing to report concerns they may have about illegal, unethical or improper conduct involving RMIT or its staff, Council members, students or researchers, while protecting the person making the report, including disclosures in relation to modern slavery. We continue to operate an externally managed whistleblower hotline, via our third-party vendor Stopline.

Modern slavery has been a category in the overall RMIT Group Complaints report since 2023. Any allegations or complaints of modern slavery would be highlighted in the report to the ARMC on a quarterly basis.

In 2024, RMIT did not receive any whistleblowing allegations or complaints that alleged breaches of the Modern Slavery Act. We acknowledge this does not necessarily indicate that no modern slavery occurred during this period, and we remain committed to ensuring our whistleblowing mechanisms are trusted and accessible to our stakeholder groups.

In 2024, a new centralised digital complaints management system was launched by the Central Complaints and Investigations Team. The new global, public-facing complaints portal has a clear mechanism where anyone can anonymously lodge a complaint regarding allegations of modern slavery breaches. For more information visit our **complaints page**.

Safer Community is our dedicated service for students and staff to report unwanted or threatening behaviour, including whether they are experiencing, or know someone who is experiencing substandard treatment.

As part of RMIT's commitment to addressing identified modern slavery issues within its operations and supply chains, a response and remediation protocol is being developed as a key component of the RMIT Modern Slavery Roadmap. At present, any such instances would be responded to in accordance with our existing policies and procedures.

Impact

7

Since its founding, RMIT has been an active and influential member of civil society, working to build trust and create shared benefits in the communities where we operate. To meet future challenges and shape the world, RMIT expects all graduates to demonstrate a wide range of practical skills and expertise whatever their program of study, including being ethical global citizens. RMIT's collaborative approach to research means we work together with our partners to develop and apply knowledge to shape a better world. It is with this lens of learning, teaching, research and partnership that RMIT can have the greatest impact in helping to address global challenges such as human rights and modern slavery. This section provides a brief snapshot of the work undertaken in 2024. For more information on RMIT's sustainability impact, read our latest **Sustainability Annual Report**.

RMIT Business and Human Right Centre

A good example of the positive impact the University can have through research and industry outreach is the **RMIT Business and Human Rights Centre** (**BHRIGHT**). Located in the College of Business and Law, the Centre addresses the human rights impact of business through research, education, innovation and collaboration. BHRIGHT is the first centre for business and human rights in Australia, running masterclasses, consultancies and design labs to generate and share innovation and train current and future leaders to develop and integrate human rights standards in their respective industry contexts.

BHRIGHT amplifies the voices of affected communities and workers through a range of conceptual frameworks and methods to develop solutions for a future that is fairer, more equitable and sustainable.

Examples of impact from BHRIGHT in 2024:

Australian Research Council Discovery Grant success:

Professor Shelley Marshall, along with UNSW colleagues Prof. Justine Nolan and Professor Natalie Klein, received an Australian Research Council Discovery Grant ($742,000) for a project addressing modern slavery in the fishing industry in the Indo-Pacific.

Advocating for stronger modern slavery protection:

BHRIGHT member Professor Shelley Marshall was invited to appear at a public hearing of the Legal and Constitutional Affairs Legislation Committee to give evidence to its Inquiry into the Modern Slavery Amendment (Australian Anti-Slavery Commissioner) Bill 2023. In her co-authored piece for The Conversation, 'More forced marriages and worker exploitation — why Australia needs an anti-slavery commissioner' Professor Marshall wrote that although modern slavery is on the rise around the world, convictions have fallen. Failure to provide an Australian anti-slavery commissioner with this independence, adequate resourcing and relevant powers, could undermine the effective functioning of Australia's Modern Slavery Act.

Society 5.0 Ethics – A festival of ideas:

Co-hosted by RMIT's Enabling Impact Platforms and the University of Utrecht, The Society 5.0 Ethics festival of ideas conference was held in mid-2024.

BHRIGHT member, Professor Shelley Marshall, was joined by Professor Chris Berg, RMIT University and Leigh Ashlin, Simbl for a panel discussion on 'Supply Chain Governance, Human Rights and Ethics'. BHRIGHT Co-Director Jonathan Kolieb hosted a roundtable event at the conference, 'Should Australia Recognise a Right to the Internet? A roundtable exploring human rights priorities in Society 5.0.'

A panel discussion, 'When Tools Become Weapons: The dark side of everyday technology' explored the causes, prevalence, nature and impacts of technology-facilitated abuse, as well as different research, law, policy and practice responses to this growing problem. The panel included BHRIGHT member, Dr Nicole Shackleton and former BHRIGHT PhD, Dr Laura McVey.

UN Special Rapporteur on contemporary forms of slavery:

BHRIGHT Co-Director Dr Kate Grosser and Professor Shelley Marshall contributed to a roundtable with Professor Tomoya Obokata, the UN Special Rapporteur on contemporary forms of slavery, hosted by the Castan Centre
for Human Rights Law and the Human Rights Law Centre. This was part of the Special Rapporteur's country visit to Australia, and an opportunity for academics and members of civil society organisations to share knowledge and insights.

BHRIGHT participation in Business and Human Rights week in Geneva:

BHRIGHT Co-Director Dr Jonathan Kolieb headed to Geneva, Switzerland in late November for the UN Annual Forum on Business and Human Rights along with over 3,000 other BHR-interested delegates. Dr Kolieb spoke at several side-events, and helped convene the Business and Conflict Community of Practice's annual workshop.

RMIT Online

Since 2017, **RMIT Online** has focused on its mission to create 'a community of lifelong learners successfully navigating the world of work'. RMIT Online has a strong focus on the future of work and supplying the skills that organisations and Governments need to compete in rapidly evolving marketplaces.

To address these skills gaps, RMIT Online has established partnerships with over 90 industry organisations to build an innovative portfolio of online micro-credential short courses and accredited degrees centred around digital, business and sustainability skills. Course areas range from programming and AI, through to business skills that are vital to our digital present and future, such as AI strategy and Digital Marketing.

The micro-credential short courses are industry-led, addressing in-demand skills and designed around activity-based learning experiences with real-world project assessments that are often applied to a learner's work or interest areas. RMIT Online has been addressing the emerging skills needs for sustainability and social impact within organisations both in Australia and in Europe.

In 2024, RMIT Online partnered with Deloitte, Thankyou and Humanitech, to launch a new course in **Sustainability and Social Impact**. The short course, led by industry experts from a range of sectors, empowers participants to drive impactful change by learning how to build and execute a strategic ESG plan within their organisation, gain
the necessary skills to lead operational change and achieve stakeholder approval.
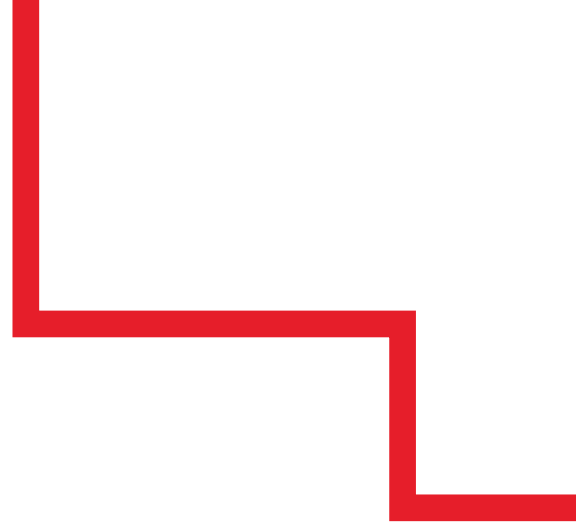
As part of the course student learn about modern slavery and broader human rights issues, including the complex challenges, reporting requirements, and strategic actions required to address these serious ESG issue.

In its first year, the course had 187 enrolments across six program runs, providing real world training to both individuals wanting to upskill and businesses looking to improve staff capabilities.

Appendix 1 — Controlled Entities

Appendix 1 – Controlled Entities Entity	Identifier	Description
RMIT Holdings Pty Ltd (Australia)	ABN 74 096 911 312	RMIT Holdings Pty Ltd (Australia) is the holding company for RMIT University Vietnam LLC (private Vietnamese company) operating the business of RMIT University Vietnam.
RMIT University Vietnam LLC	MSDN 0302169193	A wholly owned entity of RMIT Holding Pty Ltd. Its purpose is to conduct education and training activities for both undergraduate and postgraduate levels in Vietnam. It also supports research activities with an aim to help solve critical global problems and to deliver significant economic, social and environmental impact.
RMIT Training Pty Ltd, trading as RMIT University Pathways (RMIT UP)	ABN 61 006 067 349	RMIT UP is an international education provider owned by RMIT University, providing a range of solutions to students, academics and professionals in Australia and overseas. RMIT UP houses a number of other operations and services, spanning a broad cross-section of education and learning, including Informit, a leading digital destination connecting people across the globe with credible, current and hard-to-find information from trusted international thought leaders and academics. Previously trading as RMIT Training Pty Ltd, RMIT UP officially adopted its new trading name in August 2024, coinciding with the opening of its bespoke building at Franklin Street, Melbourne.
RMIT Online Pty Ltd	ABN 38 614 454 170	A wholly owned entity of RMIT. Its purpose is to advance education through online modern technology and pedagogy and to provide best-in-class digital learning experiences. It provides undergraduate, postgraduate and short courses of study to support people through a lifelong learning journey.
RMIT Spain S.L.	CIF B65886012	A wholly owned entity of RMIT. Its purpose is to promote RMIT's global teaching, industry and research activities in Europe and serves as a gateway for the University to European research, industry, government and enterprise. Trading as RMIT Europe, the University's European hub was established in 2013 and is based in Barcelona, where it connects RMIT to Europe for research and innovation outcomes including collaborative research and development with industry, European research project consortia membership, HDR opportunities as well as student experiences.

Index

Final index to be incorporated in the final design to page references for the RMIT response in the statement.

The Modern Slavery Act sets out seven mandatory criteria for the content of statements:

Reporting criteria	Section of statement that addresses reporting criteria	Page
Identify the reporting entity.	About this statement	3
Description of reporting entity's structure, operations and supply chains.	About RMIT	6
	Our people	18
	Our supply chain	24
Description of the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	Our people	18
	Our supply chain	24
Description of the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes.	Our compliance landscape	10
	Our people	18
	Our supply chain	24
	Grievance Mechanisms and Remediation	38
Description of how the reporting entity assesses the effectiveness of such actions.	Throughout	
Description of the process of consultation with any entities the reporting entity owns or controls.	About this statement	3
Other relevant information.	Impact	40