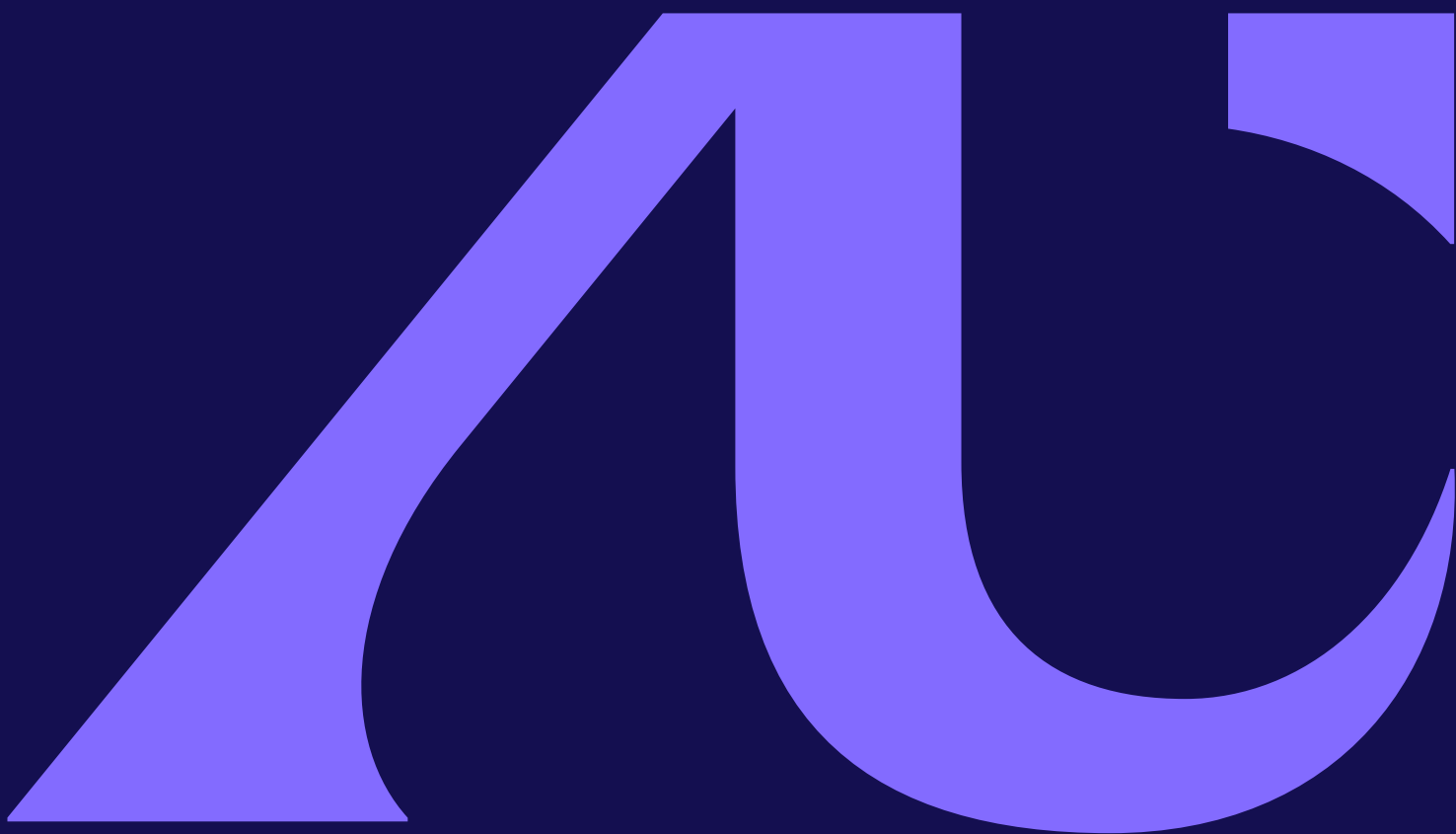


**2025**

# **Modern Slavery Statement**



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### **Acknowledgement of First Nations Peoples**

Adelaide University respectfully acknowledges the Kaurna, Boandik and Barngarla First Nations Peoples and their Elders past and present, who are the Traditional Owners of the lands on which our campuses are located across South Australia.

We also acknowledge the many other First Nations of lands across Australia with which we conduct business, their Elders, ancestors, cultures and heritage. We recognise Aboriginal and Torres Strait Islander peoples as the original custodians of the lands and waters across Australia and respect their enduring cultural practices and knowledge systems.



## A note from the Vice-Chancellor

Adelaide University is committed to upholding the highest standards of integrity, ethical conduct and respect for human rights across our operations and supply chains. As a newly established institution, formed through the merger of the University of Adelaide and the University of South Australia, we recognise our responsibility to build upon the strong foundations of our founding universities while embedding consistent, robust and transparent approaches to managing modern slavery risks.

Modern slavery is a serious and pervasive issue that can exist within complex and multi tiered supply chains across all sectors, including higher education. While Adelaide University's activities during the 2025 reporting period were primarily focused on establishment and transition, we acknowledge the importance of maintaining vigilance and strengthening controls during periods of organisational change.

This Statement outlines how Adelaide University has identified, assessed and addressed modern slavery risks during the reporting period, drawing on the established policies, systems and sector collaborations of our founding universities. It reflects our commitment to continuous improvement and to strengthening our approach further as Adelaide University becomes fully operational from 1 January 2026.

This Statement has been approved by the Adelaide University Transition Council as the University's principal governing body on 12 May 2026.

**Professor Nicola Phillips**  
Vice Chancellor and President, Adelaide University

# Introduction

This Statement has been prepared pursuant to the Modern Slavery Act 2018 (Cth) and outlines actions taken by Adelaide University (ABN 41 202 953 738) to identify, assess and address modern slavery risks in its operations and supply chains from 1 January 2025 to 31 December 2025.

# Statement

## 1. Reporting entity and structure

Adelaide University (ABN 41 202 953 738) was established on 8 March 2024 pursuant to the *Adelaide University Act 2023 (SA) (Adelaide University Act)* and combines The University of Adelaide and the University of South Australia (**Foundation Universities**).

Modern Slavery Statements have been submitted by the Foundation Universities for the reporting period.

The operational commencement date for Adelaide University was 1 January 2026.

During the reporting period of 2025, Adelaide University was being established and was not yet fully operational. Its activities were limited to transition and establishment functions, including the integration of the Foundation Universities and preparation for full operational readiness in 2026. These activities included, but were not limited to, governance

establishment, systems and data integration, operating model design, workforce transition, infrastructure planning, and other preparatory activities necessary for operational commencement of Adelaide university.

Adelaide University did not have any controlled entities during the reporting period.

Adelaide University meets the reporting threshold under the Act due to revenue associated with transition and establishment activities undertaken during 2025.

### Structure

The structure of Adelaide University during the reporting period was prescribed in Divisions 2 to 5 of Part 7 of Schedule 1 to the Adelaide University Act. Further details are available on the **Governance Page** of the Adelaide University website.

### Staff

During the year professional staff and academic staff transitioned from the Foundation Universities to Adelaide University

Employment conditions for staff applied under the enterprise agreements of the Foundation Universities during the reporting period.

 **~8,109**  
**total staff**



## 2. Governance

During the reporting period, the Transition Council established under the Adelaide University Act was the governing body of Adelaide University. The functions and responsibilities of the Transition Council included:

- Oversight of the transition of tertiary education and research being provided and conducted by the Foundation Universities to being provided and conducted by Adelaide University.
- Preparation of Adelaide University to commence providing courses and other tertiary education programs under the Adelaide University Act.

The Transition Council is therefore the appropriate governing body to approve Adelaide University's 2025 Modern Slavery Statement.

Under the Adelaide University Act, on and from operational commencement on 1 January 2026 or on and from the dates prescribed in the legislation:

- Foundation Universities ceased to exist as independent institutions. Assets, contracts and liabilities of the Foundation Universities will transfer to Adelaide University.
- References to a Foundation University in any contract or instrument will be taken to be referenced to Adelaide University.
- Adelaide University becomes the successor in law of each Foundation University; and
- Any obligation of a Foundation University to provide a report or other information will become an obligation of Adelaide University.

The Adelaide University Act also authorised each Foundation University to take steps and provide resources to facilitate the establishment of Adelaide University, including making available staff, resources and facilities to support transition and establishment activities.

## 3. Operations and supply chain

### Scope of activities during the reporting period

The descriptions of Adelaide University's operations, workforce and supply chains in this Statement relate to activities undertaken during the reporting period of 1 January 2025 to 31 December 2025. During this period, Adelaide University undertook transition and establishment activities only and was not fully operational. Where reference is made to governance, procurement practices or workforce arrangements, these reflect the transitional arrangements in place during the reporting period, including reliance on the systems, policies and supply chains of the Foundation Universities.

### Operations

During the reporting period, as Adelaide University was not fully operational, its activities were limited to transition and establishment functions required to prepare for commencement of operations in 2026.

These activities included:

- Governance establishment
- Systems, data and process integration
- Workforce transition and planning
- Infrastructure and service planning
- Procurement of professional, technical and advisory services supporting merger and establishment activities.

Operational activities relevant to modern slavery risk management including procurement, recruitment and contractor engagement were undertaken using the existing structures, policies and systems of the Foundation Universities, which continued to operate as separate legal entities during 2025.

### Workforce

During the reporting period:

- Professional staff transitioned from the Foundation Universities from January 2025
- Academic staff transitioned from May 2025
- New staff were employed directly by Adelaide University where required.

Employment conditions for staff applied under the enterprise agreements of the Foundation Universities during the reporting period.

Adelaide University's combined workforce was **8,109 staff**.



### Supply chains

Adelaide University’s supply chain during 2025 primarily reflected the supply chains of the Foundation Universities.

Procurement activity during the reporting period focused on transition related goods and services, particularly:

- Professional, scientific and technical services
- Information media and telecommunications
- Administrative and support services.

To support Adelaide University specific procurements, **Interim Procurement Guidelines** were introduced, establishing:

- Risk based sourcing and approval thresholds
- Centralised procurement validation
- Consideration of ethical sourcing and modern slavery risks
- Escalation pathways for higher risk or higher value procurements.

In 2025, Adelaide University:

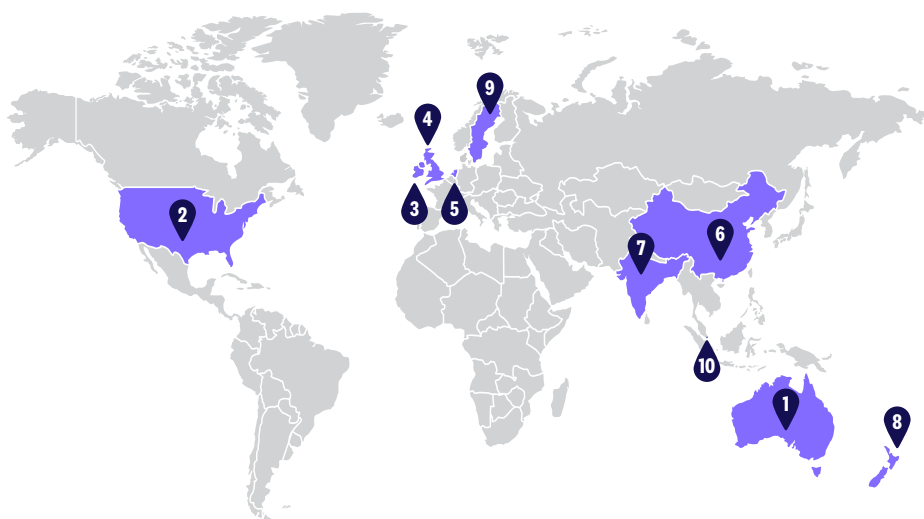
- Spent approximately **\$283 million** on goods and services
- Engaged **541 suppliers**
- Identified **no suppliers rated as high risk**

Approximately **96%** of supplier spend occurred within Australia.

These suppliers were distributed as follows:



### Top 10 countries by supplier spend in 2025



1. Australia	96.0%
2. United States	1.2%
3. Ireland	1.0%
4. United Kingdom	0.4%
5. Netherlands	0.2%
6. China	0.1%
7. India	0.1%
8. New Zealand	0.1%
9. Sweden	0.1%
10. Singapore	0.1%

## 4. Modern slavery risks

### Operations:

The risk of modern slavery occurring within Adelaide University's direct operations during the reporting period was assessed as low.

This assessment reflects:

- Predominantly Australian based workforce
- Compliance with Australian workplace relations and employment legislation
- Coverage by existing enterprise agreements through the Foundation Universities
- Established governance frameworks applied through the Foundation Universities

No students were enrolled by Adelaide University during 2025.

### Supply Chain:

Adelaide University recognises that modern slavery risks can arise within complex and multi tiered supply chains, including those supporting professional services, ICT, construction related activities, cleaning, catering and laboratory supplies.

Modern slavery risk exposure during the reporting period was managed through:

- Reliance on Foundation University procurement policies and procedures
- Participation in sector wide risk identification initiatives
- Use of the Proxima Group modern slavery risk rating tool via the Australasian Universities Procurement Network (AUPN).

The following categories were identified as higher risk across the higher education sector:

- Building repair and construction
- Information and communications technology
- Scientific equipment and laboratory supplies
- Commercial cleaning.

No new or unique categories of modern slavery risk were identified as arising solely from Adelaide University's establishment activities.

In addition to sector wide risk categories, Adelaide University recognised that its own supply chain risk profile during the reporting period was influenced by the concentration of spend on transition related professional services and information and communications technology. These categories supported merger integration, systems implementation and advisory services and accounted for the majority of procurement activity during the reporting period. While these engagements were primarily with Australian based Tier 1 suppliers assessed as low risk, Adelaide University acknowledges that such services may involve extended

subcontracting arrangements. Accordingly, modern slavery risks associated with labour practices within subcontracted services were considered through the application of inherited due diligence controls, contractual requirements and sector based risk assessments.

## 5. Actions taken to assess and address risks

### Due diligence and risk assessment

During 2025, Adelaide University relied on established modern slavery risk management programs of the Foundation Universities, including:

- Risk based procurement and tender processes
- Modern slavery clauses in supplier contracts
- Supplier Codes of Conduct
- Mandatory modern slavery questionnaires for relevant tenders
- Centralised procurement oversight

A retrospective third party supplier risk profile covering **541 suppliers** was completed in December 2025. No suppliers were assessed as high risk.

### Sector collaboration

Adelaide University, through the Foundation Universities:

- Remained an active member of Australasian Universities Procurement Network (AUPN)
- Participated in sector wide risk mapping and information sharing
- Participated in the South Australian Modern Slavery Network
- Contributed to the AUPN University Anti Slavery Program
- Participated in modern slavery roundtables and collaborative supplier engagement pilots.

### Remediation processes

No confirmed instances of modern slavery were identified during the reporting period.

If modern slavery risks or incidents were to be identified, Adelaide University would:

- Escalate the matter through procurement, legal and risk governance pathways
- Engage with suppliers to investigate and remediate identified issues
- Require corrective actions within agreed timeframes
- Terminate supplier arrangements where remediation is not feasible or effective
- Refer matters to appropriate authorities where required.

## 6. Assessing effectiveness of university actions

The University has relied on Foundation University governance, procedures, supporting tools and awareness in relation to the identification, management and reporting of modern slavery risks. The effectiveness of these frameworks is reviewed periodically under the requirements of the Foundation University governance. The University has not yet identified any known risks or instances of modern slavery which have necessitated action.

Effectiveness of actions during the reporting period was assessed through:

- Reliance on Foundation Universities' governance, audit and risk frameworks
- Review of Proxima Group risk mapping outcomes
- Retrospective supplier risk profiling

Key indicators for 2025 included:

- 541 suppliers assessed through sector and institutional risk tools
- 96% of spend with Australian Tier 1 suppliers assessed as low risk
- No suppliers rated high risk
- Absence of identified modern slavery incidents.

Adelaide University acknowledges that, as a newly established institution, its effectiveness assessment during the reporting period was inherently limited by reliance on inherited frameworks. These limitations are expected to reduce as Adelaide University embeds its own systems in 2026.

Adelaide University considers this assessment approach to be appropriate and proportionate for a transition year reporting entity and will further enhance its effectiveness measures as standalone systems, policies and training programs are embedded from 2026.



## 7. Consultation

Consultation for this Statement included:

- Management teams across Adelaide University
- Management teams across both Foundation Universities
- People and Culture, Finance and Procurement functions.

Consultation was undertaken through targeted discussions and document reviews to confirm operational context, risk exposure and existing controls.

As Adelaide University had no controlled entities during the reporting period, no consultation was required under joint or controlled entity arrangements.

Consultation outcomes informed confirmation of Adelaide University's transitional operating context, validated reliance on Foundation University procurement and risk management frameworks and supported the identification of transition specific modern slavery risk factors, including those associated with professional services, ICT procurement and supplier subcontracting arrangements.

Legal advice was sought and confirmed that this Statement is compliant with the mandatory reporting requirements of the Modern Slavery Act 2018 (Cth).

## 8. Other relevant information

Adelaide University is committed to continuous improvement in managing modern slavery risks.

From 1 January 2026, the University will:

- Implement new procurement policies and procedures
- Consolidate modern slavery governance frameworks
- Enhance staff awareness and training
- Strengthen supplier engagement and monitoring.

Adelaide University will continue to monitor legislative developments and sector best practice to ensure ongoing compliance with the Modern Slavery Act 2018 (Cth).



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## Further enquiries

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**Adelaide University**  
SA 5005 Australia

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