

MODERN SLAVERY STATEMENT



UNIVERSITY OF
NEWCASTLE

2024



CONTENTS

3	Introduction
4	Mandatory criteria for reporting
5	Approval by principal governing body
6	Our University
8	Our locations
9	Our controlled entities
10	Key achievements in 2024
12	Australasian Universities Procurement Network
13	Our risks
15	Supply chain
16	Country and geographic risk
17	Product risk
18	Mitigation
19	Actions taken
21	Action plan
22	Due diligence
24	Controlled entity NUServices
25	Controlled entity NUsport
27	Investments
28	Assessing effectiveness
29	Grievance mechanisms and remediation
30	Looking ahead 2025
31	Version history

ABOUT THIS STATEMENT: This Modern Slavery Statement (Statement) is made in accordance with the Australian Modern Slavery Act 2018 (Cth). It applies to and describes the steps taken by the University of Newcastle (the University - ABN 15 736 576 735) in its entirety during the year ending 31st December 2024 to mitigate modern slavery within the University supply chains and other operations.

INTRODUCTION

In accordance with our University's commitment to human rights, we continuously improve our response to addressing modern slavery risks in our operations and supply chains. This Modern Slavery Statement reflects our commitment and fulfills the University's obligations under Part 2 of the Modern Slavery Act 2018 (Cth) for the period 1 January 2024 to 31 December 2024.

Our response to addressing modern slavery risks is facilitated by our Anti-Slavery Working Group, which includes representatives from diverse areas of the organisation and our four controlled entities. This group leads the implementation of the University's Modern Slavery Action Plan and wherever possible ensures alignment with the NSW Anti-Slavery Commissioner's Guidance on Reasonable Steps (GRS).

Our University takes great pride in ensuring that we take action to prevent and not contribute to modern slavery practice within our operations and supply chains.

We do this through:

- assessing areas of risk;
- making an effort to eliminate any connections to modern slavery practices we identify;
- educating staff and students to build capacity to identify, report, and respond to red flags or actual instances of modern slavery;
- providing support for members of our community who have been affected by modern slavery; and,
- working closely with partners and suppliers with the objective of eliminating modern slavery within our sphere of influence.



ACKNOWLEDGEMENT OF COUNTRY

The University of Newcastle acknowledges the Traditional Custodians of the lands on which our campuses are located - The Worimi nation and the Pambalong clan of the Awabakal nation (Newcastle) Darkinjung people (Central Coast) and the Gadigal clan of the Eora nation (Sydney). We pay respect to Elders past, present and emerging. We also acknowledge and pay respect to the other Aboriginal and Torres Strait Islander nations from which our students, staff and community are drawn.

MANDATORY CRITERIA

HOW THIS STATEMENT MEETS THE REPORTING REQUIREMENTS OUTLINED IN SECTION 16 OF THE ACT

CRITERION	PAGE NUMBER
a) Identify the reporting entity.	5
b) Describe the reporting entity's structure, operations and supply chains.	7-9, 15-17
c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	13-17
d) Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	10-12, 18-27
e) Describe how the reporting entity assesses the effectiveness of these actions.	28
f) Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls. A joint statement must also describe consultation with the entity covered by the statement.	3,31
g) Any other information that the reporting entity, or the entity giving the statement, considers relevant. (Summary of Action Plan included)	21,30



APPROVAL OF THIS STATEMENT



Approval

This Modern Slavery Statement was approved by University Council in April 2025. Council is the principal governing body of the reporting entity as defined by the Modern Slavery Act 2018 (Cth). The University of Newcastle is the parent entity of The University of Newcastle Research Associates Ltd (TUNRA), NUServices Pty Ltd, Newcastle University Sport (NUSport) and Newcastle Australia Insititute of Higher Education Pte Ltd (NAIHE Singapore), each included in this Statement, although not otherwise reporting entities as defined by the Modern Slavery Act 2018 (Cth).



Signature of Responsible Member

This Modern Slavery Statement is signed by a responsible member of the reporting entity's principal governing body (University Council).

A handwritten signature in black ink, appearing to read 'A Zelinsky', written in a cursive style.

2 May 2025
Professor Alex Zelinsky AO
Vice Chancellor and President

THE UNIVERSITY OF NEWCASTLE



TOP 10

university in Australia for
Graduate Employability¹



TOP 200

university in the world²



TOP REGIONAL UNIVERSITY

One of the top regional
universities in Australia³



36,000

over 36,000 students from over
100 different countries⁴



6500

international students from over
100 different countries⁵



5-STAR

maximum rating for social
equity⁶



180 PARTNERSHIPS

in 32 countries student exchange
and study abroad programs

1 Innovation Connections IC Report 2014 - 2020 2 QS World University Rankings 2025 3 QS World University Rankings 2022 4
University of Newcastle Data Warehouse 2023 5 University of Newcastle Data Warehouse 2023 6 The Good Universities Guide
2022

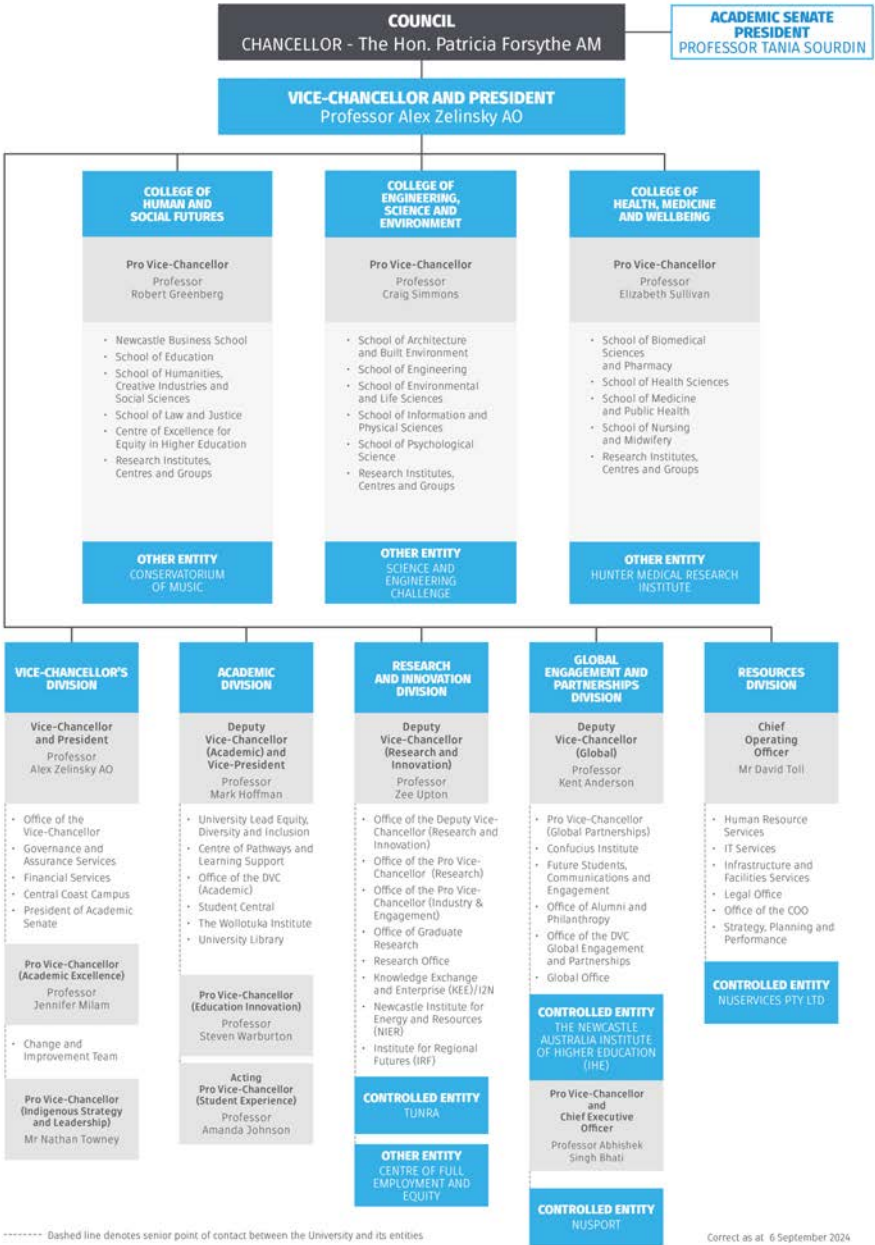
STRUCTURE AND OPERATIONS

Since 1965, the University of Newcastle has delivered superior education and world-class research. We are Australia's largest provider of enabling programs, offering a range of alternate entry pathways to university for students from 100 countries. The University is one of the largest employers in the Hunter Region, employ around 2700 FTE staff, with many additional casuals and University affiliates. Our staff and community come from a wide range of professional and cultural backgrounds.

The University's principal governing body is the Council. It is responsible for acting in the University's best interest, setting the risk appetite and driving performance through strategy and stewardship.

Council operates in accordance with the University of Newcastle Act 1989 and the University of Newcastle By-law 2017, which set out the powers and functions of the University and how these must be performed.

An Executive Leadership Team defines and focuses the University's strategic direction. It is a forum for the Executive to share information and provide advice to the Vice-Chancellor on matters of operational significance. It operationalises the strategic plan through business planning processes and prioritisation of operational decisions.





We are ranked in the world's top 200 universities by QS World University Rankings and top ten in climate action globally. Our degrees are shaped around flexible and transferable skills, work placements and entrepreneurial opportunities.

Across our campuses in Newcastle, the Central Coast, Sydney and Singapore, the University of Newcastle enrolls more than 36,000 students from diverse backgrounds, with a focus on equity and developing the world's next generation of socially-oriented leaders, entrepreneurs and innovators. We are fully committed to building on our strengths in Indigenous higher education, and providing a supportive space for our Indigenous students and communities.

THE UNIVERSITY OPERATES ACROSS THE FOLLOWING LOCATIONS:

- Callaghan Campus (Newcastle)
- Newcastle City Campus - NUspace & Honeysuckle
- Central Coast Campus - Ourimbah & Gosford
- Sydney Campus
- Singapore Campus
- John Hunter Hospital (Newcastle)
- Wallsend Hospital (Newcastle)
- Orange regional office
- Tamworth regional office
- Taree regional office
- Armidale regional office
- Moree regional office
- Coffs Harbour regional office
- Muswellbrook (Upper Hunter regional office)

OUR CONTROLLED ENTITIES

The University of Newcastle Research Associates Limited (TUNRA)

In 1969, the University formed The University of Newcastle Research Associates (TUNRA) as a vehicle to build and promote applied research opportunities for the University and industry. As a wholly owned subsidiary of the University, TUNRA plays an important role in the University's strategy by further leveraging research capabilities and assets to create additional value for the institution. TUNRA employs around 80 staff and enables business, industry and government to connect with experts. Specific Divisions within TUNRA facilitate a wide range of services for numerous Australian and international clients. 'TUNRA Connect' provides a platform for University experts to collaborate with partners on consulting, testing services and industry short courses to deliver research led solutions. 'TUNRA Bulk Solids' (TBS) provides consulting and contract research services for the resource and process sectors.

TUNRA also hosts two key major research projects with partners ImmVirX, focused on developing novel oncolytic viruses to create powerful cancer immunotherapy combinations, and Mineral Carbon International (MCI), pioneers of carbon innovation, developing a carbon capture and use solution to transform CO₂ into saleable minerals.

In 2024 TUNRA reported an income of AUD\$13.7m.

NUServices Pty Ltd

NUServices provides campus-based services to students, staff and the community. Services include retail, food and beverage, venue management and hire, commercial leases and University merchandise. NUServices Pty Ltd shares the University's commitment to sustainability and excellence.

In 2024 NUServices reported an income of AUD\$2.9m

THE UNIVERSITY OPERATES FOUR CONTROLLED ENTITIES

Newcastle Australia Institute of Higher Education Pte Ltd

Established as a controlled entity of the University in 2006, UON Singapore (NAIHE) has continued to deliver and expand both its full-time and part-time programs. Our strong partnerships with leading local institutions provide our diverse range of local and international students access to a broad variety of professional networks when they graduate.

Researchers work with world-class organisations and institutions in the Singapore region and across the globe on research projects, research seminars, and faculty-specific collaborations.

In 2024 Newcastle Australia Institute of Higher Education reported an income of AUD\$16.1m.

Newcastle University Sport (NUSport)

NUSport enables the students, staff and community members to participate in sport, health, fitness and wellbeing activities through facilities, programs and services delivered from The Forum Sports and Aquatic Centre and Sports Precinct, Callaghan, The Forum Health and Wellness Centre at Honeysuckle and a pop up gym at Ourimbah. It oversees the NUSport Performance Centre, the University of Newcastle Elite Athlete Program, University representative sport, multiple sports clubs, social sport competitions, community programs and services, including Learn to Swim programs. In 2022 NU Sport adopted the University's Procurement Policy.

In 2024 NUSport reported an income of AUD\$9.4m.



YEAR IN REVIEW

In 2024, the NSW Anti-Slavery Commissioner visited our Callaghan campus, engaging in constructive discussions with the Executive Leadership Team, key members of the Anti-Slavery Working Group, and some of our international students. The Commissioner provided valuable insights into current modern slavery risks affecting the higher education sector, particularly vulnerable international student populations.

Our University developed and adopted an inaugural University-wide Modern Slavery Policy. This followed extensive consultation across the University, its controlled entities and external stakeholders. The Policy applies to all areas of the University.

Our Anti-Slavery Working Group expanded its membership (which now includes representatives from each controlled entity), and our staff contributed valuable insights for future priorities. Progress was assessed against our Anti-Slavery Action Plan, and measures were implemented to ensure that University community members will have access to high-quality training modules in 2025.



COLLABORATION – A SECTOR RESPONSE

AUPN ANTI-SLAVERY PROGRAM

We work closely with the Australasian Procurement Professionals Network (AUPN). The AUPN comprises 38 Australian and three New Zealand member institutions collaborating to improve procurement practices and to develop the skills of procurement professionals in the higher education sector. The objective of its Anti-Slavery Program (Program) is to support members to improve supply chain human rights transparency, reduce individual university costs and resources, collaborate on risks and issues for greater impact, and contribute to reporting requirements.

Five University representatives attended monthly forums organised by the AUPN Program to hear from guest speakers and share knowledge. Two staff were actively engaged with AUPN Anti-Slavery Working Group providing leadership for the Program. In 2024, the key areas of focus for the Program related to the risk software utilised by members, capability uplift, engagement with suppliers and external collaborators, inter-university collaboration on specific risk areas, and third-party program support.

Together, member universities made significant progress in 2024. Supplier data was uploaded into ArcBlue platform for 91,000 suppliers across 33 universities. Suppliers were risk assessed for a \$12.8 billion combined spend. 2807 suppliers across member universities are assessed as very high risk.

72 supplier self-assessment questionnaires were issued, with only four suppliers declining and 20 not completed as at time of reporting. Insights from the responses show that for university suppliers, there is an overall lack of policies and controls, with approximately a third of suppliers not having mapped and assessed the risks across their supply chain, half of the suppliers not conducting supplier training, and many suppliers reporting they are not aware they source materials from countries at risk, but conversely confirming they source copper, minerals, silver, rubber and/or timber (high risk commodities with high country risk).

The AUPN Program established a process to leverage collective university resources to create a transparent, effective, and scalable process to manage and remediate shared supplier's modern slavery risk. Five suppliers will pilot a Collaborative Remediation Plan Approach in 2025. The initiative will enable the measurement of annual improvement and allow universities to collaborate and report on compliance.

The Australian Red Cross International Student Worker Exploitation Hub project was initiated and our university promoted the 2024 National Temporary Migrant Survey to students. This survey collects data international students' experiences of modern slavery indicators. The Migrant Justice Institute will present the international student results and provide a sector wide report in early 2025 so that we can create an evidence-based sector wide response.

Representatives from our University assisted the Australian Catholic Religious Against Trafficking in Humans (ACRATH) Project Advisory Group to review some newly developed online modern slavery micro credential modules. This "Education for Change" package aims to address the drivers of modern slavery and empower victims and survivors by raising awareness of modern slavery within the higher education sector. We plan to roll out these modules to staff and students in 2025.

In 2025 the AUPN Program expects to scale up supplier self-assessment processes and remediation plans; facilitate deeper collaboration on shared risks and issues; provide further engagement with third party collaborators; ensure capability uplift; and, promote sector adoption of a data spend analytics tool.

In 2025 our University expects to make further progress in our approach to identifying modern slavery risks, documenting our risk profile, educating our staff, and reporting on outcomes against our Action Plan.

OUR VISION

For the Australian and New Zealand universities to be recognised as being at the forefront of delivering procurement impact and excellence internationally

OUR MISSION

Continuously improve operational, strategic and responsible procurement practices through collaboration and knowledge sharing



MODERN SLAVERY RISK IN OUR OPERATIONS AND SUPPLY CHAINS

Modern slavery is a global issue. The nature and extent of modern slavery means there is a high risk that it may be present in many industries and sectors, including higher education. Universities in Australia have been found to have supply chains that include goods and services from countries where slavery and exploitation are prevalent. This means our University is certainly at risk of supporting or benefiting from modern slavery practices.

THE NATURE OF RISKS IN THE HIGHER EDUCATION SECTOR

Some of the specific risks in an Australian university include:

Labor exploitation:

Universities may use contractors who engage in exploitative labour practices, such as paying workers below minimum wage or forcing them to work in hazardous conditions. Industries such as cleaning can be higher risk.

Procurement of goods:

Universities may purchase goods and services from suppliers who engage in modern slavery practices, such as forced labour, debt bondage, or human trafficking. Such practices may be more difficult to detect if they are further down the supply chain. Some areas of spending that present very high risk include new build works, temporary labour, laboratory consumables, scientific equipment and marketing and promotional items.

Student exploitation:

International students can be particularly vulnerable to modern slavery for a number of reasons, including:

- language and cultural barriers and social isolation;
- restrictions on working hours that combine with cost of living pressures to incentivise riskier work and tolerance of abuse, harassment, discrimination or coercion in the workplace, as well as underpayment;
- limited willingness to speak up often due to concerns about potential loss of visa status or retaliation against themselves or their families;
- a limited understanding of Australian workplace and immigration regulations and rights; and
- limited access to support from civil society, unions and government.

Domestic students can also be vulnerable to labour exploitation involving dangerous or substandard working conditions that infringe upon their rights. This includes situations directly linked to the University. For example, higher degree research students could be asked or pressured to perform unpaid work associated with their supervisor's research or personal interests.

While some of the above examples may not amount to modern slavery, such forms of exploitation are still unacceptable at the University. Modern-slavery risks are identified through the Anti-Slavery Working Group with actions designed to address areas of most risk. From time to time, the Anti-Slavery Working Group also develops strategies where simple steps can be taken to prevent or address some of the less extreme forms of exploitation that could potentially impact the University community.

We assess the risk that our University is causing, contributing to, or being directly linked to modern slavery.

Risk that we may cause modern slavery:

Our existing processes for recruitment, employee management, labour hire, contract management, and volunteering roles, have strong protections for individuals in relation to exploited labour. One area of risk for us however is the potential for our students, particularly international higher degree research students, to be manipulated into undertaking unfair unpaid work associated with the University. This is an area of focus for our Anti-Slavery Working Group. It is our aim that educational materials, Codes of Conduct and the support services provided to our students and student-facing staff will ensure any such instances are promptly identified, reported and acted upon.

Risk that we may contribute to modern slavery practice:

We have considered the risks that our University may be involved in acts or omissions that facilitate or incentivise modern slavery. This was an important consideration when recently awarding a cleaning contract to a new supplier. This new partnership is with a contractor certified under the Cleaning Accountability Framework (CAF) 3-Star Prequalification, ensuring compliance with ethical labour standards, and reducing modern slavery risks within the high-risk cleaning services category.

Another example of ways we try to minimise the risk of contributing to modern slavery is when setting targets, timeframes and contract conditions for construction suppliers. We aim to ensure we are not inadvertently limiting ourselves to suppliers that must rely upon exploited labour to deliver projects for us.

Risk that we may be directly linked to modern slavery practice:

This is where the most attention for our Anti-Slavery Working Group is focused. We have made significant progress in how we review the activities of entities we have a relationship with to reduce the risk of being linked to modern slavery practice.

With some support and guidance from the AUPN, we consider our spend for the year, our suppliers and products and services sourced, the countries within our supply chain, and the various commodities in within that chain. For example, we have a significant spend in the area of electronic goods, which is consistent with other universities. We accept there is a strong possibility that electronic goods we purchase could be manufactured by an entity that uses minerals sourced from a third entity which could have been mined by a fourth entity that uses forced labour. This risk is a good example of why the University made the decision to start collecting additional information from our suppliers, adding modern slavery clauses in contracts, and undertaking other due diligence steps.

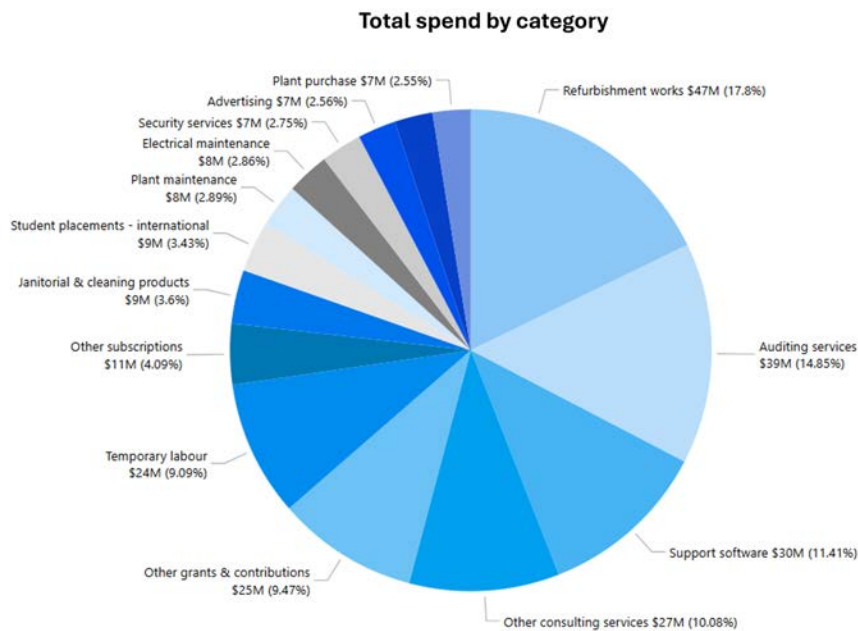


SUPPLY CHAIN

OVERVIEW

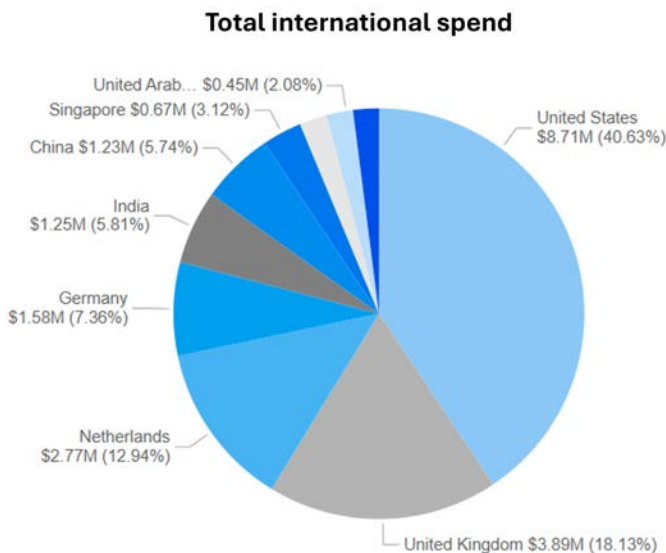
In 2024 our total non-salary spend was **\$391 million**. The University and its controlled entities engaged directly with **3178** trade creditors (suppliers) of which **541** were based outside of Australia.

Suppliers were assessed for risk of modern slavery by utilising the Global Slavery Index (GSI) to the yearly data. The GSI presents national estimates of the scope and composition of modern slavery for 160 countries.



Our 2024 spend data highlights that **223** suppliers made up **80%** of total University spend on third party goods and services. When risk analysis was conducted on the University's suppliers based on total spend, we found that **94%** of the third party goods and services sourced were provided by suppliers whose country of origin is **Australia**.

The image below illustrates the country of origin of the majority of our tier one suppliers located **outside of Australia**:



RISKS AND IMPACTS

COUNTRY OF ORIGIN RISK IN OUR SUPPLY CHAIN

The University of Newcastle acknowledges that it is likely to be exposed to some level of modern slavery risk in its supply chains - millions of people in the Asia Pacific are engaged in forced labour as an example of our potential exposure. In 2024, **98%** of the University spend on third party goods and services is with suppliers based in low-risk countries, as defined by Global Slavery Index. This includes the Australian-based suppliers and suppliers from non-Australian countries that are categorised as low risk. In 2024, no money was spent in a country categorised as extreme risk.

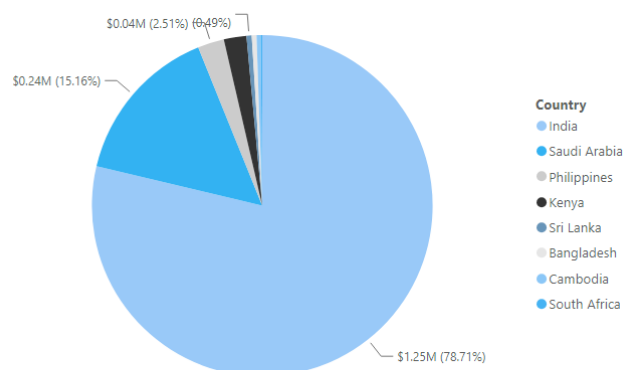
The majority of the University's suppliers have Australian-based subsidiaries with whom we deal directly. As a result, a high percentage of our direct sourcing is conducted within Australia.



Our controlled entity, NIAHE, located in **Singapore**, has a distinct risk profile. In 2024, we carried out minor office renovation work in our rented office and teaching space in Singapore. Generally, there are potential labor risks associated with migrant workers in Singapore, especially those hired by contractors for construction work. The Global Slavery Index profile for Singapore indicates that some of these workers may find it challenging to leave abusive employers without risking visa loss, deportation, or forfeiting security deposits. We are currently exploring ways to ensure that all contractors engaged in Singapore are committed to preventing and eradicating these practices in their operations.

High Risk Countries by Spend

Our University spent \$1.58 million in countries categorised as **high risk** by the Global Slavery Index. Approximately 92% of this was spent across two countries - **India and Saudi Arabia** with the majority of this spend relating to student placements, education consultants and advertising.



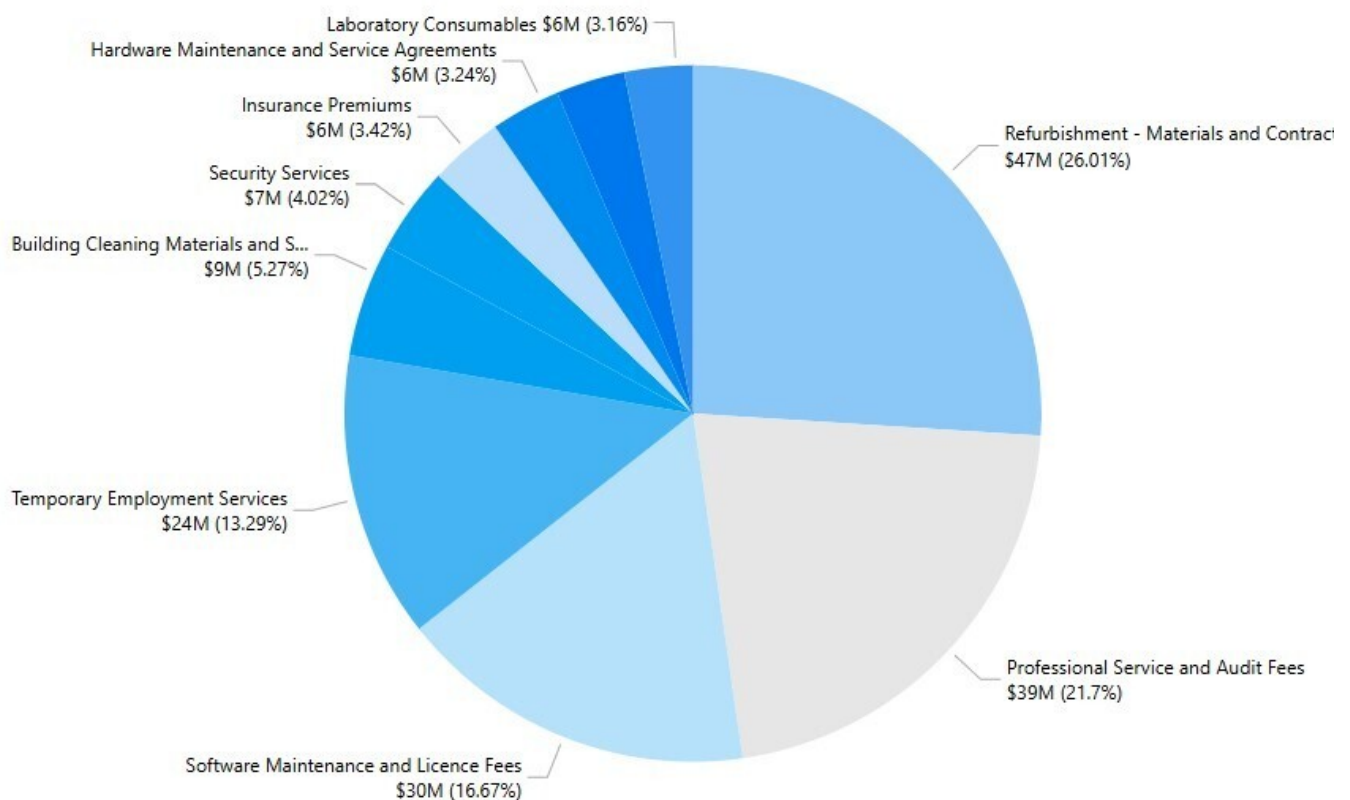
RISKS AND IMPACTS

PRODUCT RISK IN OUR SUPPLY CHAIN

- **3178 SUPPLIERS**
- **94% OF GOODS AND SERVICES PURCHASED IN AUSTRALIA**
- **98% OF SPEND IN LOW-RISK COUNTRIES**



High Risk Spend by Category



MITIGATION

APPROACH TO MANAGING RISKS

The University employs a range of controls to manage any potential or actual risks of modern slavery within both its operations and supply chain.

Policy and Procedure

The policies and procedures are available to all staff and relevant training is provided where responsible parties are directly involved and accountable.

POLICY/ PROCEDURE	PURPOSE
Staff Code of Conduct	Sets behavioural expectations including ethical obligations.
Enterprise Agreements (EA's)	Ensure lawful workplace obligations are met for Professional Staff and Academic Staff.
Procurement Policy	Contains ethical obligations that must be met when procuring goods and services on behalf of the University.
Complaint Management Policy and Procedure	Establishes how the University will manage and assess formal complaints and grievances.
Ethical Framework	Guides and supports decision-making at all levels. Intended to be a 'compass' for navigating the University's complex ethical landscape.
Engagement of Contractors and Consultants Procedure	Sets out risk mitigation strategies when engaging contractors and consultants.
Risk Management Framework	Sets out the University's commitment to managing risk and outlines key roles and responsibilities.
Support for Students Policy	Outlines mechanisms for ensuring that students are aware of relevant support services.
Modern Slavery Policy	Framework for a strong response to modern slavery risk through a University wide approach.

Probity Principles

University staff are required to consider the following through all stages of the procurement process:

- Open competitive process
- Fairness, consistency and transparency
- Identification and resolution of conflicts of interest
- Accountable decision making
- Monitoring and evaluating performance

Contract Clauses

The University has embedded Modern Slavery compliance into its standard contracts.

Following is an excerpt of a modern slavery clause in contracts for the procurement of goods and/or services.

Compliance

The Supplier must ensure that:

- (a) in performing its obligations in connection with this document, the Supplier and its Representatives:
 - (i) do not engage in any conduct or omission which may contravene any Modern Slavery Laws; and
 - (ii) comply with any University Policies relating to modern slavery;
- (b) it does all things required or necessary to mitigate or reduce modern slavery risks in its operations and supply chains and stay in compliance with all applicable Modern Slavery Laws; and
- (c) the terms of the contractual commitment entered into with any personnel engaged by the Supplier to provide goods or services in connection with this Agreement, permit termination of commitments where the Supplier has reasonable grounds to believe there has been or is likely to be a breach of any applicable Modern Slavery Laws.

Obligations

The Supplier must:

- (a) promptly notify the University if it becomes aware of a possible, potential, suspected or actual breach by it or its Representatives of any Modern Slavery Laws;
 - (b) cooperate in good faith with the University in investigating the circumstances relevant to any possible, potential, suspected or actual breach of any Modern Slavery Laws, whether or not notification has been given under clause (a);
 - (c) give assistance and access to the agreements and the Supplier Representative as the University may reasonably require under clause 43.3 and must provide (at the Supplier's cost) all reasonable assistance (including the provision of information) to the University to allow the University to comply with its obligations under the Modern Slavery Laws;
 - (d) establish and maintain policies and procedures to ensure that the Supplier and the Supplier Representative comply with the obligations set out in this clause 43.
- The Supplier must ensure that its policies and procedures as contemplated in this clause (d) contain requirements that training will be provided to the Supplier Representative, as the case may be, in relation to the matters addressed by those policies and procedures; and
- (e) require its suppliers to implement their own binding guidelines for ethical behaviour and compliance with Modern Slavery Laws.

ACTIONS TAKEN

ACTIONS TAKEN TO ASSESS AND ADDRESS RISKS

The University's Anti-Slavery Working Group met four times in 2024 with subgroups of members working on various initiatives between meetings. A detailed Action Plan was developed and progress is tracked (see following page).

In 2024 we adopted a more robust and systematic approach to managing modern slavery risks in our supply chains. We took some specific actions to reduce the risk that goods and services procured were a product of modern slavery, including:

- Embedding modern slavery clauses across all standard forms of contracts with suppliers and service providers.
- Implementing a Supplier Code of Conduct that explicitly addresses modern slavery expectations.
- Conducting modern slavery risk assessments for all procurement activities valued over \$250,000 using the NSW Anti-Slavery Commissioner's GRS Inherent Risk Identification Tool (procurements flagged with a 'heightened' modern slavery risk undergo additional evaluation, including assessment against weighted criteria for supplier responses to Modern Slavery schedules).
- Collaborating with the Australian Universities Procurement Network (AUPN) Anti-Slavery Working Group to:
 - o Promote knowledge sharing and strategies for addressing modern slavery.
 - o Develop and refine supplier self-assessment questionnaires to deliver consistency across the sector.
 - o Aggregate sector wide procurement data for trend analysis and shared risk management.
 - o Leverage sector wide supply chain risk management platforms, to monitor and address inherent risks.
- Integrating modern slavery considerations within the University's Investment Policy and conducting ESG reviews to assess and mitigate risks across the investment portfolio.
- Undertaking work to expand modern slavery training to all staff involved in procurement and contract management.
- Increasing sourcing and partnerships with local, small, and medium enterprises (SMEs) that meet ethical labour standards, supporting community development while reducing modern slavery risks.
- A new partnership established for the provision of cleaning services with a contractor certified under the Cleaning Accountability Framework (CAF) 3-Star Prequalification, ensuring compliance with ethical labour standards, and reducing modern slavery risks within the high-risk cleaning services category.

How we are addressing the risk presented to our vulnerable student cohorts (particularly international students):

We have a number of initiatives that aim to provide international students with information to help them understand safe and respectful relationships, and avoid and report exploitative arrangements.

The International Student Support (ISS) Team has implemented a comprehensive Orientation and Onboarding Program, consisting of five thorough pre-arrival modules which students coming to Australia to study are required to complete before their arrival. The University's Student Wellbeing Team developed an 'International Student Survival Guide' in booklet form, that is provided to arriving students.

The type of information provided to students includes addressing situations where employment and accommodation leases are linked or there are cash-in-hand working arrangements. Students receive education around the Australian regulatory framework governing employment and Awards and their rights as an Australian worker. They are made aware of sources of help such as support services available to them, legal services available, and how they can contact the Fair Work Ombudsman and International Student Ombudsman. In 2024 we partnered with Youthlaw to conduct employability sessions that consolidate some of these learnings.

Our ISS teams partner with the Careers Service, Campus Care and external agencies to support international students who may want to raise issues, be connected with services, or potentially make formal reports related to modern slavery practices or situations. Further specialist support is available to students through the International House Drop-In Centre, Wellbeing Services (counselling and prevention services and our Student Advocates) as well as the Chaplaincy Service.

We have ensured representation on our Anti-Slavery Working Group includes members in critical student facing roles, with an invitation to be extended to our Chaplains and student counselling service in 2025.

We have gained commitment to promoting the new ACRATH Educating for Change Modules for staff and students as soon as they are available. This will provide us with capacity to track staff completion rates by hosting the SCORM package on our learning management system, 'Discover'.

We facilitated a meeting between some of our international students and the NSW Anti-Slavery Commissioner in 2024, to ensure further awareness raising for this cohort.



2025 ACTION PLAN

ACTIVITY	PERFORMANCE MEASURE	IN PLACE	UNDER DEVELOPMENT
Modern slavery awareness training	Completion rate - for staff (Procurement Module) and in 2025 the 'Educating for Change' modules for staff and students. Currently waiting SCORM package from ACRATH.	X	-
Ongoing review of all policies relevant to modern slavery	Three yearly review of Modern Slavery and Procurement Policies embedded within Council Cycles	X	-
Modern slavery risk awareness across the University	Risk Profiles for Colleges and Divisions identify modern slavery risk events and associated controls where relevant	-	X
Risk mitigation - supplier risk	Supplier onboarding undertaken; ArcBlue /risk scores checked and/or self assessment questionnaires completed	X	-
Stakeholder engagement	Sufficient participation in Anti-Slavery Working Group - multiple teams represented and collaboration with controlled entities	X	-
Clauses and provisions in contracts	Incorporating specific Modern Slavery clauses into all contractual templates	X	-
Modern slavery embedded into procurement processes	Procurement workflows and records reflecting appropriate steps	X	-
Sector benchmarking and collaboration	Participation in AUPN and engagement with NSW Anti-Slavery Commissioner	X	-
Supplier code of conduct	Embedded in process	X	-
Grievance mechanisms	Complaints Management Framework includes multiple safe avenues for concerns to be raised by stakeholders	X	-
Regular reporting - supplier information and risk	Upload university data to ArcBlue for inclusion in supplier reports for sector produced via AUPN Anti-Slavery Program	X	-
Supplier onboarding	Proportion of questionnaires returned. Reasons for non-completed questionnaires. Follow-up undertaken where potential concerns identified.	X	-
NSW Anti-Slavery Commissioner's GRS	Implementation of steps and strategies that are applicable to, or of value to, the University. This includes having a Modern Slavery Risk Management Plan documented by July 2025.	-	X
Returnable Schedules - Procurement	Further alignment with NSW GRS model tender schedules for higher risk procurements. Review drafted Schedule against risk factors.	-	X
Data and reporting	Procurement risk assessments are in place. TechOne needs to support Arcblue, AUPN and GRS requirements. Modern Slavery Assessments for all contract >\$150K will be able to be reported from 2025.	-	X
Improving response to international student vulnerability	Updates to international students' guide, pre-arrival modules in Canvass, employability sessions and other resources	-	X
Red Flag monitoring	Regular review of complaint categories and themes from Complaints Office and potentially Student Advocacy / Wellbeing services	-	X
Engagement of Boards within Controlled Entities	Ensure Boards are engaged in the process of preparing the Modern Slavery Statement.	-	X
Improving risk management in Singapore operations	Further collaboration between Singapore Finance Team and Strategic Procurement to inform risk assessment and required strategies for contractor engagement	-	X
Engagement with Electronics Watch	Participation in pilot program to understand supply chains - desktop hardware	-	X
Effective functioning of Anti-Slavery Working Group	Membership includes a cross section of staff - attendance at meetings and completion of action plan items	X	-

DUE DILIGENCE

Due Diligence is a cornerstone of the University's Risk Framework and is incorporated into all we do across the business. The University considers how it may cause, contribute to, or be directly linked to modern slavery practices and its ongoing risk management process of human rights diligence aims to identify, prevent and mitigate adverse impacts.

ArcBlue software provided via our AUPN membership offers a risk assessment solution relevant to the University's supply chain for products, countries, industries, and suppliers. It allows the University to stay on top of risk through data visualisations, reports, and alerts. We have visibility of end-to-end supply chains to identify possible risks.

Our continuous review of policies and procedures ensures we are on target for meeting our obligations.

We have Enterprise Agreements to protect our staff from exploitation, unfair work practices, conditions or environments.

Our Staff Code of Conduct ensures compliance with ethical standards, legal obligations and other University expectations and commitments. Our Supplier Code of Conduct helps to control supplier risk.

Modern slavery risk is outlined within the Operational Risk Profile for Strategic Procurement. Risk events and associated controls will be identified and documented across all Divisions and Colleges as relevant.

Supplier Self-Assessment Questionnaires allow suppliers to identify any real or potential breaches of Modern Slavery Act; and a

Code of Conduct for Suppliers helps to ensure they abide by the University's expectations.

Partnerships are crucial. The University works with its suppliers to identify any breaches and continues to work with them to mitigate any risks collaboratively.

Training will be enhanced and more widely available in 2025. Staff will be better equipped to identify and respond to modern slavery risk. Staff who procure goods on behalf of the University will continue to be particularly targeted for training.

We are working to ensure our international students are informed about modern slavery related risks and are aware of support services available to reduce their risk of exploitation, or to support themselves or student colleagues in risky or unsafe situations.

Our collaborative engagement with the AUPN will strengthen our ability to identify potential or real risks for our sector.



SUPPLIER CODE OF CONDUCT

The University is committed to understanding and managing social, ethical and environmental issues along its supply chain in a responsible manner. The Supplier Code of Conduct outlines the minimum terms and conditions of doing business with the University.

The Supplier Code of Conduct is mandatory for all suppliers, including:

- construction vendors;
- ICT vendors;
- research vendors and partners including those subject to a Funding Agreement; and
- all procurement vendors.



SOME KEY FEATURES OF THE SUPPLIER CODE OF CONDUCT

Employment is freely chosen

Freedom of association and the right to collective bargaining are respected

Working conditions are safe and hygienic

Child labour is not used

Living wages are paid

Working hours are not excessive

No harsh or inhumane treatment is used

The University requires these suppliers to comply with the standards set out in the Code and to work with the University to assess and manage compliance in their supply chain.

The Code is based on the University's own Ethical Framework and the Ethical Trading Initiative (ETI) Base Code.

Contractors working for the University, have reporting channels available under the University's Public Interest Disclosure Policy, and the NSW Independent Commission Against Corruption (ICAC) in instances of actual or suspected fraud, corruption, misconduct or maladministration.

SUPPLIER ANALYSIS - CONTROLLED ENTITY

NUSERVICES PTY LTD



Our controlled entities are committed to detecting and addressing modern slavery risk in their supply chains. For significant procurement activities, they follow University procedures.

Nuservices manages on-campus commercial activities, campus services and amenities (such as food services and dining). NUservices takes its commitments to trade ethically and to protect human rights in the supply chain very seriously, having a rigorous supplier onboarding process and meticulous risk-assessment processes guaranteeing high standards when it comes to working conditions, environmental impact, and sustainability.

In 2024 NUservices only procured \$18,000 of goods from countries other than Australia.

When undertaking procurement direct from suppliers in high-risk countries and high-risk procurement categories, NUservices look for the following supplier accreditations when undertaking due diligence:

- **SGS Certification:** SGS are one of the world's leading inspection, verification, testing and certification company. The SGS certification process involves factory inspections and can be relied upon to verify claims made by overseas suppliers. We insist upon SGS certification to ensure adequate working conditions when undertaking procurement in high-risk product categories and from high-risk countries.
- **ISO 45001 Certification:** ISO 45001 is the worldwide accepted standard and contains requirements for a healthy and safety management system regarding work conditions. A company who demonstrates they have held ISO45001 certification over a long period of time (several years or more) demonstrates a commitment to adequate work conditions and guarantees zero tolerance for slavery-like conditions, forced labour, or child labour.
- **SAI SA8000 Certification:** SA8000 is one of the world's leading social certification programs. The standard and the rigorous certification program provides a framework for suppliers to conduct business in a way that is fair and decent for workers. SA8000 Certification ensures a supplier is compliant with International Labour Organisation (ILO) conventions and international human rights law as set out in the UN Declaration of Human Rights.

In addition to externally recognised certification programs, Nuservices also employ the following risk controls:

- Meaningful and credible supplier engagement
- University Code of Conduct
- University Procurement Policy
- University Ethical Framework

SUPPLIER ANALYSIS - CONTROLLED ENTITY

NUSPORT

NUsport is responsible for The Forum venues based at The University of Newcastle Callaghan Campus and at Harbourside in the Newcastle Honeysuckle precinct. The Forum is a leader in providing quality health, fitness, sport & recreation services to its Newcastle community and surrounds.

Throughout its history NUsport has grown and succeeded because it understands and adds value to the role that sport and recreation plays within the University of Newcastle and the wider community. It has worked with students and staff of the University of Newcastle, sporting authorities and groups and with the wider community to promote sport as an essential part of life.

Supported by the knowledge and experience of our highly skilled team, our activities and our programs are designed to help our community lead a healthy lifestyle. The Forum is actively part of its community and through our partnerships we work towards the right outcomes for our members and the wider community.

NUsport takes its commitments to trade ethically, ensuring that human rights are upheld, dignity is respected, and all individuals are free from exploitation. Aligning with University of Newcastle Procurement Policy ensures that our supply chains are transparent and at low risk of forced labour, human trafficking, and child labour.

Furthermore, we make a firm commitment to raise awareness of modern slavery risks and promote a culture of accountability. Ethical practices also include collaborating with stakeholders, to combat modern slavery on a broader scale, ensuring that all people can live and work freely, without fear of exploitation.

When undertaking procurement direct from suppliers in high-risk countries and high-risk procurement categories, NUsport verify supplier compliance with the following supplier accreditations when undertaking due diligence:

SGS Certification: SGS are one of the world's leading inspection, verification, testing and certification company.

The SGS certification process involves factory inspections and can be relied upon to verify claims made by overseas suppliers. We insist upon SGS certification to ensure adequate working conditions when undertaking procurement in high-risk product categories and from high-risk countries.

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SA8000 Certification ensures a supplier is compliant with International Labour Organisation (ILO) conventions and international human rights law as set out in the UN Declaration of Human Rights. In addition to externally recognised certification programs, NUsport also employ the following risk controls: · Meaningful and credible supplier engagement · University Code of Conduct · University Procurement Policy · University Ethical Framework

OUR INTERNATIONAL STUDENTS

The University of Newcastle recognises that international students face increased risks of exploitation in various aspects like employment, accommodation, and situations involving debt bondage. To address these concerns and mitigate the vulnerabilities faced by our international students, the International Student Support (ISS) Team has implemented a comprehensive Orientation and Onboarding Program, consisting of five thorough pre-arrival modules which students coming to Australia to study are required to complete before their arrival. Additionally, the University's Student Wellbeing Team developed an 'International Student Survival Guide' in booklet form, that will be provided to arriving students from Semester 1, 2024.

These initiatives aim to provide international students with information to help them understand safe and respectful relationships, avoid arrangements where employment and accommodation leases are linked, avoid cash-in-hand work, understand the Australian regulatory framework governing employment and Awards and their rights as an Australian worker. Students are made aware of sources of help such as the internal and external support services available to them, legal services available, and how to contact the Fair Work Ombudsman and International Student Ombudsman.

ISS also partner with the Careers Service, Campus Care and external agencies to support international students who may want to raise issues, be connected with services, or potentially make formal reports related to modern slavery practices or situations. Further specialist support is available to students through the International House Drop-In Centre, Wellbeing Services (counselling and prevention) and other resources such as the Chaplaincy Service.

As a member of the Australian Universities Procurement Network (AUPN), the University is currently engaged in a multi-stakeholder project addressing international student worker exploitation risk with the Australian Red Cross and Australian Catholic Religious Against Trafficking in Humans. The aim is to develop resources to educate international students on working conditions and to educate student-facing staff on signs of exploitation with the launch of materials planned for early to mid 2025. The University's Anti-Slavery Working Group is identifying staff who have contact with international students to ensure appropriate upskilling and engagement and will disseminate information to relevant staff.



RESPONSIBLE INVESTING



OUR APPROACH

The University of Newcastle is committed to responsible investment. Our investment strategy is governed by an Environmental, Social and Corporate Governance (ESG) Framework outlined within our Investment Policy. This Framework sets out the University's overall philosophy, commitment and methodology for addressing environmental, social and governance factors within its investment portfolio.

All amounts invested are invested in a manner consistent with this Framework and in accordance with the University's Ethical Framework and Environmental Sustainability Plan.

The University seeks to understand any material ESG risks embedded in its investments and manage them accordingly.

Mercer is the University's fund manager and undertakes activities to ensure compliance and progress with the ESG objectives set by University's Finance Committee.

Mercer's approach to assessing and addressing modern slavery risks includes:

- avoiding causing or contributing to modern slavery through its investment activities;
- seeking to assess and address modern slavery risk linked to its investment practices, through its appointed investment managers and in the portfolio; and
- providing appropriate access to remedy if there are any instances where Mercer's investments or linked entities are found to have caused or contributed to modern slavery (Mercer state that they expect to apply their influence to encourage proper access to remedy).

Mercer analyses its listed equity and corporate credit funds for modern slavery incident flags as aligned to the Principles of the UN Global Compact regarding forced labour and child labour. During the latest ESG review completed by Mercer, no funds were identified in the University's investments assessed as being of high severity risk level (red flag incidents), although there were four holdings with an amber flag (medium severity). These are being monitored on a watchlist that feeds into Mercer's manager engagement prioritisation. The holdings are: Carrefour SA, Sony Group Inc., Fast Retailing Co. Ltd and Target Corporation. Each has faced allegations of failing to prevent forced labour in supply chains within China. Carrefour is additionally alleged to be benefiting (through its supply chain) from the State-sponsored labour of Uyghur and other Muslim minority groups.

ASSESSING EFFECTIVENESS



What we are doing to check whether our actions to address modern slavery risk are working:

- Our Anti-Slavery Working Group regularly reviews actions taken and risk areas to be prioritised
- We are cross-referencing prioritised risk areas against risks and controls outlined in operational risk profiles created by University teams
- We undertake information sharing and benchmarking against other AUPN member universities
- The University's risk team are guiding the Working Group's approach to enhance risk assessment practice and documentation for 2025
- We engage with suppliers for heightened risk procurements
- We have proactive engagement with the Complaints Team to identify reports or grievances that may amount to modern slavery instances or allegations

Number of formal complaints received in 2024 alleging or indicating modern slavery practice: Zero

GRIEVANCE MECHANISMS AND REMEDIATION

GRIEVANCE

The University has a strong grievance framework which can be utilised for reporting of any suspected instances of modern slavery practice, or any breaches of related laws, policies or procedures. The framework includes:

- Complaint Management Policy and Complaint Management Procedure
- Public Interest Disclosures Policy as per Public Interest Disclosures Act 2022
- Compliance Management Policy including a breach reporting function through Legal and Compliance
- Comprehensive range of support services for students

REMEDIATION

The University is committed to providing remediation in an open and transparent manner to ensure that appropriate action has been taken to prevent future occurrences.

The University will provide for, or cooperate in, remediation where the University has caused or contributed to an adverse impact.

Where we did not cause or contribute to the harm, but are directly linked to modern slavery, we will use our leverage to work with the entity that caused the harm, or consider ending the business relationship. Our grievance processes (Complaint Management Procedures, Public Interest Disclosures Policy and others) and Supplier Code of Conduct are promoted widely in our internal and external communications.

Remedying or counteracting negative human rights impacts may include apologies, termination of relationship or contract, or efforts to ensure non-repetition and similar future occurrences.

Our actions will depend on factors such as:

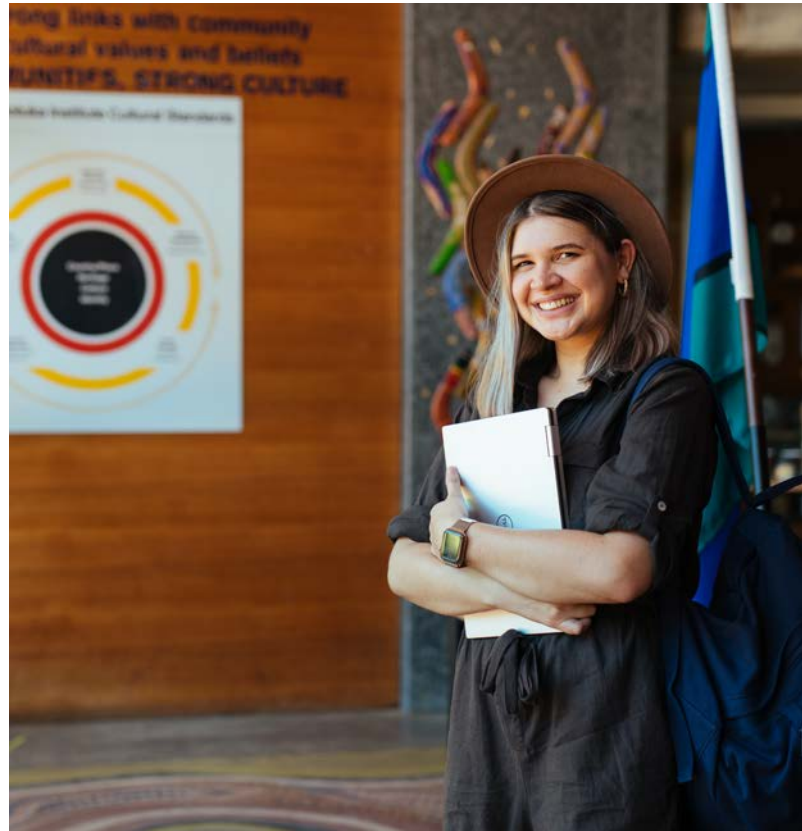
- leverage over the entity concerned;
- how crucial the relationship is;
- severity of the impact (victim focused);
- the risk appetite of the University; and/or
- whether termination of the relationship will potentially create adverse human rights impacts.



LOOKING AHEAD

IMPROVING OUR RESPONSE TO MODERN SLAVERY WILL INVOLVE:

- promoting and socialising our new Modern Slavery Policy
- rolling out training to staff, students and interested community members
- continued sector benchmarking and collaboration with other universities
- thorough consideration of the NSW Anti-Slavery Commissioner's Guide on Reasonable Steps
- further scoping of high risk products and industries
- making sure all the right people are involved
- promoting grievance mechanisms
- working with suppliers
- engaging with senior leadership and our controlled entities
- more mature systems for documenting assessment and management of modern slavery



WHAT WE WILL DO IN 2025

Our Anti-Slavery Working Group will meet at least quarterly.

Subgroups will work on the items outlined in our Modern Slavery Action Plan.

As training is rolled out, we will measure completion rates.

We will continue our participation in the AUPN Program.

Resources from the NSW Anti-Slavery Commissioner will continually be reviewed to guide our response to modern slavery risks.

We will embed processes to ensure that we can meet all reporting requirements required under both Commonwealth and State Modern Slavery legislation.

VERSION HISTORY

VERSION	EDIT	DATE	APPROVED BY
1	Document Creation	07/03/2024	Council



How we consulted with controlled entities on the development of this statement

The University Anti-Slavery Working Group consulted with each of the University's four controlled entities in the development of this Statement. Consultation occurred through representatives on the Anti-Slavery Working Group throughout the year and specific requests for information during the preparation of the document. As per the University's Anti-Slavery Action Plan, for its 2025 Statement, the University will consider involving the Boards of each reporting entity prior to final approval by University Council.

We value all feedback. Please forward any comments on this statement or requests for additional information to
strategicprocurement@newcastle.edu.au
This statement has been endorsed by the University of Newcastle's Council.



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