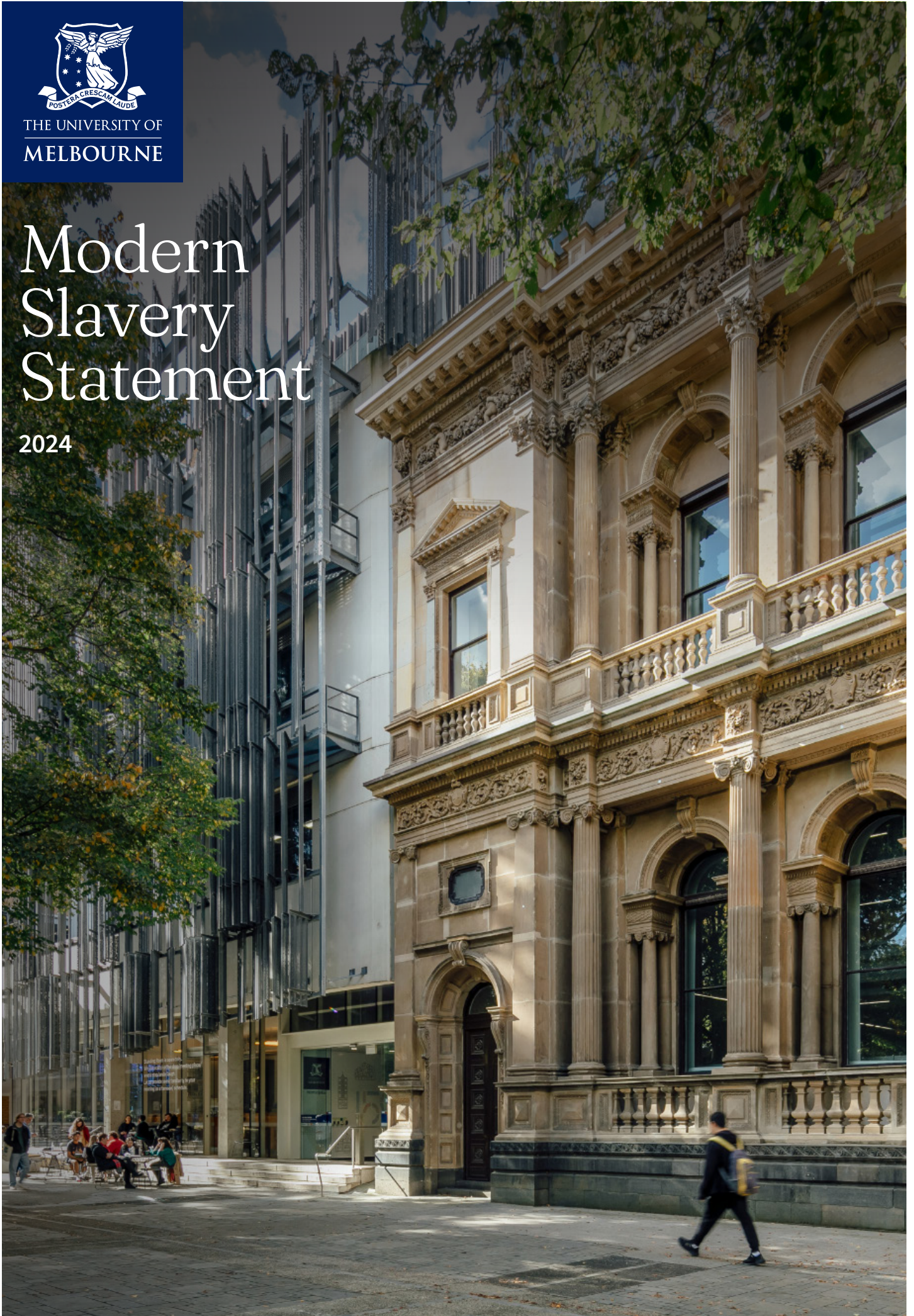




THE UNIVERSITY OF
MELBOURNE

Modern Slavery Statement

2024



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Acknowledgement of Traditional Owners

The University of Melbourne acknowledges the Traditional Owners of the unceded land on which we work, learn and live: the Wurundjeri Woi Wurrung and Bunurong peoples (Burnley, Fishermans Bend, Parkville, Southbank and Werribee campuses), the Yorta Yorta Nation (Dookie and Shepparton campuses), and the Dja Dja Wurrung people (Creswick campus).

The University also acknowledges and is grateful to the Traditional Owners, Elders and Knowledge Holders of all Indigenous nations and clans who have been instrumental in our reconciliation journey.

We recognise the unique place held by Aboriginal and Torres Strait Islander peoples as the original owners and custodians of the lands and waterways across the Australian continent, with histories of continuous connection dating back more than 60,000 years. We also acknowledge their enduring cultural practices of caring for Country.

We pay respect to Elders past, present and future, and acknowledge the importance of Indigenous knowledge in the Academy. As a community of researchers, teachers, professional staff and students we are privileged to work and learn every day with Indigenous colleagues and partners.

In making this Acknowledgment of Country we commit to respectful and responsible conduct towards all others according to the Traditional lores of this land, particularly at times of formal ceremony.

A note from the Vice-Chancellor

Global universities help to shape attitudes and ethical practices within our domains of research, education and operations. As the Vice-Chancellor of the University of Melbourne, I am committed to ensuring that our institution not only upholds the highest standards of integrity, but also actively contributes to addressing critical global issues, including modern slavery.

Modern slavery is a pervasive and systemic problem infiltrating supply chains and affecting millions of lives worldwide. Universities, with diverse procurement networks, extensive research partnerships and large cohorts of students, researchers and professional staff, are uniquely positioned to combat this issue. Our influence extends beyond the academic realm, reaching into the communities we serve and the industries we engage with.

The University's commitment to the highest ethical practices in our operations and supply chain activities is reflected in our policies and partnerships. We continuously strive to ensure that our procurement processes are transparent and that our suppliers adhere to ethical standards that prevent exploitation and abuse.

Addressing modern slavery requires more than just internal vigilance. It demands ongoing collaboration and transparency across all sectors. By working together with other institutions, businesses and government, we can create a unified front against this abhorrent practise. Our students, research initiatives and sector collaborations play a crucial role in this effort, driving innovation and raising awareness to support vulnerable members of our community.

Our collective actions have the power to influence change. By continuing to foster a culture of integrity, transparency and collaboration, we can make significant strides towards eradicating modern slavery and promoting human rights.

The University of Melbourne considers that the actions we have taken to date in addressing modern slavery risk demonstrates our commitment to the prevention of modern slavery, and we acknowledge there is more work to be done. Further actions, as outlined, will be important to continue to minimise risks of exploitation in our operations and supply chains.

This is our fifth Modern Slavery Statement and was approved by University Council on 7 May 2025.



Professor Emma Johnston AO
Vice-Chancellor



“By continuing to foster a culture of integrity, transparency and collaboration, we can make significant strides towards eradicating modern slavery and promoting human rights.”

Introduction

This statement has been prepared pursuant to the *Modern Slavery Act 2018* (Cth) and outlines actions taken by the University of Melbourne to identify, assess and address modern slavery risks in operations and supply chains from 1 January 2024 to 31 December 2024.



Statement

1. Reporting entity and structure

The University of Melbourne (ABN 84 002 705 224) was established by an Act of the Victorian Parliament in April 1853. It is a body politic and corporate and continues in existence under the *University of Melbourne Act 2009* (Vic). Under this Act, the University Council is the governing body of the University, overseeing its direction and superintendence. The University Council is therefore the appropriate authority to approve the University’s 2024 Modern Slavery Statement.

Entities owned or controlled by the University

The University’s network includes subsidiary companies, affiliated bodies and non-academic University departments.

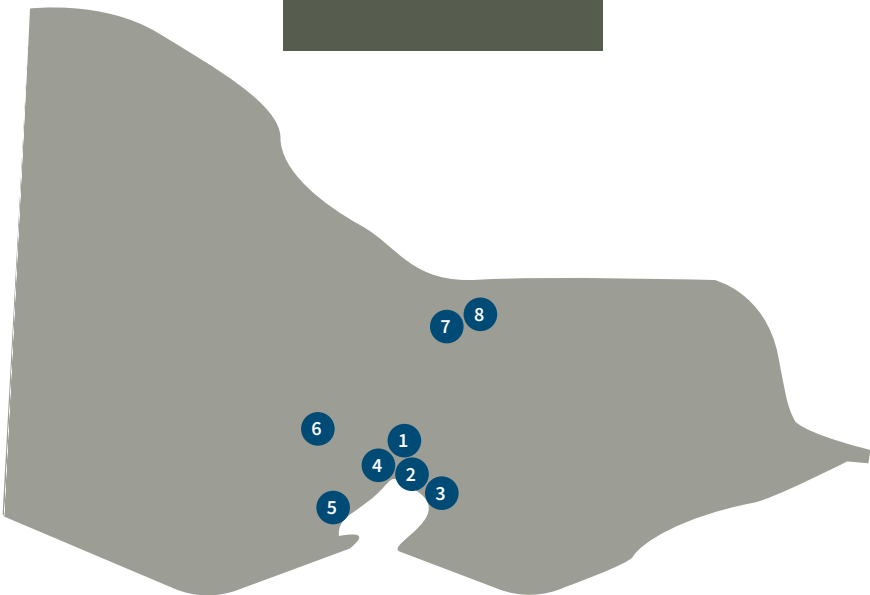
This statement is made on behalf of the University and the following entities it owns or controls³:

- Australia India Institute Private Limited (India)
- Australian Music Examinations Board (Vic) Ltd
- Doherty Clinical Trials Ltd
- Goulburn Valley Equine Hospital Pty Limited
- Melbourne Business School Ltd
- Melbourne Teaching Health Clinics Ltd
- Melbourne University Publishing Ltd
- Nossal Institute Ltd
- UMELB Pte Ltd (Singapore)
- UoM Commercial Ltd
- UM Commercialisation Pty Ltd
- UoM International Holdings Pty Ltd

Campus locations

University operations are located in Victoria, Australia. The University of Melbourne operates eight campuses across Victoria, with most operations occurring in metropolitan Melbourne.

1. Parkville (main campus)
2. Southbank (music, visual and performing arts)
3. Burnley (horticulture and agricultural science)
4. Fishermans Bend (heavy engineering and infrastructure, under development)
5. Werribee (veterinary medicine immersion)
6. Creswick (environmental and forest science)
7. Shepparton (rural health)
8. Dookie (agricultural science)

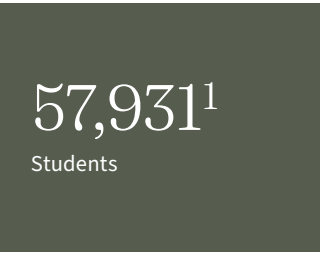


1 Equivalent Full-Time Student Load (EFTSL)

2 Total staff full-time equivalent (FTE) including continuing, fixed-term and casual staff

3 The University has 12 entities that it owns and/or controls. Doherty Clinical Trials Ltd (DCTL) is a controlled entity under the Corporations Act 2001 but is not a controlled entity under the Accounting Standards definition of control used in the Modern Slavery Act 2018. DCTL is included in this Statement as it is 100% owned by the University of Melbourne. References to controlled entities in this Statement are taken to include all 12 listed entities.

Key facts



2. Governance

The governance of modern slavery risks at the University of Melbourne is robust and consists of direct oversight by the Chief Financial Officer and review and monitoring by senior governance and management bodies.

The University Risk Management and Compliance Management Frameworks support identification and mitigation of modern slavery risks in the University's operations and supply chain.

University Council (Council)

Council is the University's peak governing body. Council has established a committee structure to ensure that detailed consideration of key areas such as finance, audit, risk management and academic affairs occurs and is reported through to the governing body. These committees play a crucial role in supporting Council's decision-making processes and ensuring comprehensive oversight of the University's activities. Council has considered and approved the modern slavery risks and mitigations outlined in this statement.

Audit and Risk Committee (ARC)

ARC supports Council in overseeing and monitoring the assessment and management of risk across the University, including in relation to University commercial activities. ARC reviews the Risk Management Framework and risk management practices and receives regular reports on significant strategic and operational risks and their management to an acceptable level. ARC advises Council, and other committees as appropriate, about existing and emerging risks and mitigations, practice improvements and progress, and recommends the Risk Management Framework, including updates to the Risk Register, Risk Management Policy and Risk Appetite Statement, to Council for approval.

During 2024, ARC continued to oversee risks associated with the activities of the University and its subsidiaries. ARC has considered the modern slavery risks and mitigations outlined in this statement and endorsed it for Council approval. This endorsed statement was subsequently approved by University Council.

University Executive (UE)

UE is the University's principal management committee. Its membership includes members of Chancellery Executive, the President of the Academic Board, and Deans of Faculties.

UE is responsible for overseeing matters relating to University strategy, management and administration. It oversees finalisation of the University's strategic plan and preparation of the annual University budget. University Executive monitors divisional performance against plans and budgets, the University's capital program and major projects. University Executive has considered and endorsed the modern slavery risks and mitigations outlined in this statement.

Risk Management and Compliance Sub-Committee

Risk Management and Compliance Sub-Committee of UE is the University's risk committee at management level and, as such, provides advice to UE and Council through ARC.

The sub-committee comprises a cross section of institutional leaders and specialist risk owners who are ultimately responsible for advising and supporting UE, ARC and Council in overseeing and monitoring the assessment of risk across the University, including University commercial activities.

The sub-committee identifies and monitors all risks, including emerging risks, risk controls and treatment plans, and provides relevant information and updates in accordance with the Risk Management Framework. The Sub-Committee has considered and endorsed the modern slavery risks and mitigations outlined in this statement.

Modern slavery compliance process

This process is a partnership model which involves a University senior executive who is accountable for compliance with the *Modern Slavery Act 2018* (Cth) as a 'compliance obligation sponsor'. The University's Chief Financial Officer has been the compliance obligation sponsor since 2023. The sponsor is supported by other University roles including the Modern Slavery Working Group.

The University's Modern Slavery Working Group is comprised of employees from multiple functions across the organisation with a focus on different components of University operations that may lead to modern slavery risks, including Legal and Risk, Student and Scholarly Services, Research Innovation and Commercialisation, University Governance and Procurement Services.

Regulatory framework 2024

The University Statute and Regulations are administered in accordance with provisions of the *University of Melbourne Act 2009*. The University's regulatory framework comprises the University of Melbourne Statute, three regulations – the Council Regulation, Academic Board Regulation and Vice-Chancellor Regulation – and University policies and processes.

The following University policies and procedures assist in supporting the University's activity to prevent and address modern slavery risks. University staff and students are required to understand their responsibilities and comply with University policies when carrying out their duties or studies. Supplier compliance with relevant policies and procedures is addressed in the Supplier Code of Conduct and, where relevant, applicable contracts.

Policy/Procedure – Operations	Principle
Appropriate Workplace Behaviour Policy	Sets out the standards, values and expectations for appropriate behaviour in the workplace.
Child Safety Policy	Outlines appropriate standards of behaviour towards children.
Contracts Policy	Governs the negotiation, execution and management of contracts.
Fraud and Corruption Management Policy	Provides guidance on behaviour that constitutes fraud and corruption and outlines the responsibilities of staff and management to report and deal appropriately with this conduct.
Managing Conflicts of Interest Policy	Outlines obligations to ensure that conflicts of interest are effectively identified, declared and managed by those undertaking the work of the University and its controlled entities
Research Ethics and Bio Risk Management Policy	Outlines the University's obligations to conduct research that meets relevant ethics requirements.
Research Integrity and Misconduct Policy	Prescribes the University's expected standards of responsible and ethical research conduct.
Risk Management Policy	Outlines the University's risk management approach and establishes staff responsibilities in managing risks.
Whistleblower Protection Policy	Provides guidance on the University's commitment to protecting whistleblowers and how the University deals with whistleblower disclosures.

Policy/Procedure – Supply chain	Principle
Procurement Policy	Sets out ethical and appropriate sourcing decision making and conduct throughout the supply chain.
Supplier Code of Conduct	<p>Outlines the minimum standards of behaviour that the University expects its suppliers to meet in the areas of human rights, labour, environment and anti-corruption.</p> <p>Based on various principles and standards, including the United Nations (UN) Declaration of Human Rights, and International Labour Organisation conventions, the Code is aligned to the UN Global Compact's ten principles and reflects the University's strong commitment to the UN Sustainable Development Goals.</p>
Supplier onboarding process	<p>Sets out the due diligence approach including compliance with legal and regulatory requirements.</p> <p>An uplift project commenced a phased implementation in 2024 which currently includes a manual risk assessment incorporating modern slavery. This is completed for all new suppliers. In 2025, the University is trialling new tooling to support enhanced modern slavery reviews across its supply base. We have, however, yet to find a tool that provides a comfortable level of due diligence and as such are also considering alternative approaches, such as using automation to transition effort from administration to outcomes due diligence.</p>

Policy/Procedure – Controlled entities	Principle
Controlled Entities Policy	Sets out the governance and reporting framework for the University's controlled entities.

3. Operations, supply chain and investments

Operations

Our faculties and Chancellery work together to deliver on our academic mission and all University activities. Our faculties and research institutes lead the delivery of our teaching and learning, research and engagement activities. Chancellery develops the overall strategic direction and policy settings for the University, allocates resources, builds capability, leads operations and delivers shared services.

Research

The University is a comprehensive research organisation addressing complex problems in innovative ways with investigator-led, interdisciplinary research collaborations. We work with academic and industry partners to explore solutions to the major challenges of our times.

In 2024, the University of Melbourne received \$685.6m in annual research income. Research is a global magnet for prospective students, graduate researchers, academics and partners. Currently, there are 5000 externally funded research projects.

The Chief Operating Officer (COO) portfolio delivers University-wide services and operational support for the organisation. The COO portfolio includes functions relating to the University’s research and innovation services, along with finances, property, technology, legal and risk management, student and academic support, operational performance, business services and sustainability, and works with the faculties and Chancellery to deliver the research agenda.

Students

The University’s Student and Scholarly Services (SASS) portfolio provides end-to-end student support. Faculties also provide opportunities for work integrated learning (WIL) and other teaching and learning support services, including co-curriculum and student experience activities.

Controlled entities

The University’s controlled entities, both in Australia and overseas, are detailed in the table below. Oversight of controlled entities is an integral part of the University’s broader compliance framework (see Section 3: Modern slavery risks).

Supply chains

The diverse and complex supply chains of the University reflect the breadth of activities that are undertaken to support the provision of higher education services, the University community and its campuses. This includes products and services that range from construction, research, teaching and learning, through to corporate services and facilities management.

Investments

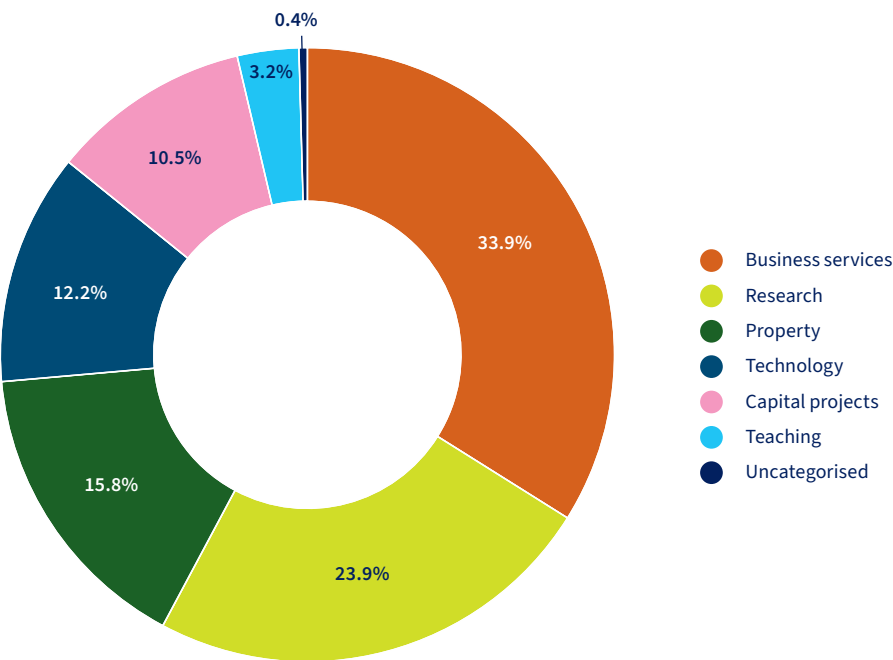
The University holds financial investments as part of its assets. These funds are externally managed by the University’s Implemented Consultant JANA and our portfolio is made up of diverse asset classes, including Australian and international equities, private equity, debt, infrastructure and property. Modern slavery is a risk within this portfolio and is managed through the University’s Responsible Investment Guide.

Name of controlled entity	Key business activities and operations	Countries the controlled entity operates in (in addition to Australia)
Australia India Institute Private Limited	Engagement activities relating to the relationship between India and Australia; student recruitment	India
Australian Music Examinations Board (Vic) Ltd	Provision of public examinations in music, speech and drama in Victoria, with around 26,000 examinations typically conducted per annum	None
Doherty Clinical Trials Ltd	Medical research, including delivery of clinical trials	None
Goulburn Valley Equine Hospital Pty Ltd	Referral and first opinion equine veterinary practice for elective and emergency cases, with placement opportunities for final year Doctor of Veterinary Medicine students	None
Melbourne Business School Limited	Provision of educational services, academic research and engagement with alumni and organisations	Malaysia
Melbourne Teaching Health Clinics	Provision of clinical placements for students and clinical care for patients attending the clinics	None
Melbourne University Publishing Ltd	Publishes scholarly writing from Australia and overseas, both within and independent of the tertiary sector	None
Nossal Institute Limited	Provision of teaching in the area of public health; specialist applied research consulting to donors (World Bank, ADB, UN Agencies) and research councils (National Health and Medical Research Council, Australian Research Council)	Papua New Guinea, Pakistan, Fiji, Solomon Islands, Cambodia, Vietnam, Laos, India, Uganda, Thailand, Philippines, Indonesia
UMELB Pte Ltd	Undertakes University profiling, student recruitment, alumni support and donor relationship development	Singapore
UOM Commercial Ltd	Commercialisation of research and teaching from the University of Melbourne	None
UM Commercialisation Pty Ltd	Trustee for Trust holding UoM equity in start-up companies	None
UoM International Holdings Pty Ltd	Oversight and governance of the University’s offshore entities in China and Germany	China, Germany (the entity in Germany is currently being wound up)

2024 spend profile



2024 third party spend category breakdown



Business services	Research	Property	Technology	Capital projects	Teaching
Human Resources Logistics and storage Marketing Office consumables Professional services Student recruitment Travel and entertainment	Grants Research consumables Research equipment Research services	Facilities management Plant and vehicles Property management Utilities and renewables	Audio visual IT hardware IT networks IT services IT software Telecom	Consultant services Furniture and fittings Works contractors	Library services Student services Teaching services

4. Modern slavery risks

The University of Melbourne is committed to taking all steps necessary to identify, assess, address and mitigate modern slavery risks.

Research

The Deputy Vice-Chancellor (Research) is the key accountable officer who oversees research at the University of Melbourne. The Research, Innovation and Commercialisation (RIC) division manages the funding, administration and signing of research-related contracts that support academics in achieving research impact and translation. RIC also provides key shared services, including risk advice conducted by the Research Due Diligence team, the Office of Research Ethics and Integrity (OREI) and Research Infrastructure, which is aligned with the Australian Code for the Responsible Conduct of Research (2018) and the University's internal policies. In the University's research operations, modern slavery risks can occur in supply chains for research equipment, data collection measures, collaboration with external research partners and subcontracts. Considering this, RIC facilitates risk assessments related to the University's collaborations, with consideration for the research activity and external research partners. This risk assessment considers partners who are owned or who operate in foreign jurisdictions where there may be poor labour regulations or higher risks of modern slavery. With respect to research-related engagements, RIC endeavours to understand whether there are risks of transaction with third parties that could, or do, perpetuate modern slavery or the likelihood of forced labour in the partner supply chain.

Additionally, human ethics approval is required for all research conducted with or about people, and their data and tissue. The purpose of the University's ethics review process is to facilitate research that fulfils the principles of human research ethics: research merit and integrity, justice, beneficence and respect. Administration of the University's human ethics review processes is supported by the Ethics Shared Service within the OREI. The Central Human Research Ethics Committee (CHREC) has oversight of all matters pertaining to ethics review of human research at the University and reports to the Research Ethics and Integrity Strategy Committee (REISC), which provides advice to the Deputy Vice-Chancellor (Research).

Students

The University is committed to mitigating modern slavery risk as they relate to students. The University acknowledges potential risk to students both within Australian and overseas and provides students with accessible information on support services to mitigate this risk.

In assessing risk across cohorts and student activities, the University identified student employment, placements and internships as areas at greatest risk of modern slavery. International students continue to be identified as being at higher risk. In 2024, the University has focussed on gauging student understanding of exploitation in the workplace and working on better promoting work rights to all students. Findings from collaboration with the Migrant Justice Institute will inform improvements to communication and support in 2025. Also, the University's active participation with the Australasian University Procurement Network (AUPN) and Red Cross in launching a Work Rights Hub will include the distribution of promotional collateral to raise student awareness and understanding of workplace rights and exploitation (see Section 5).

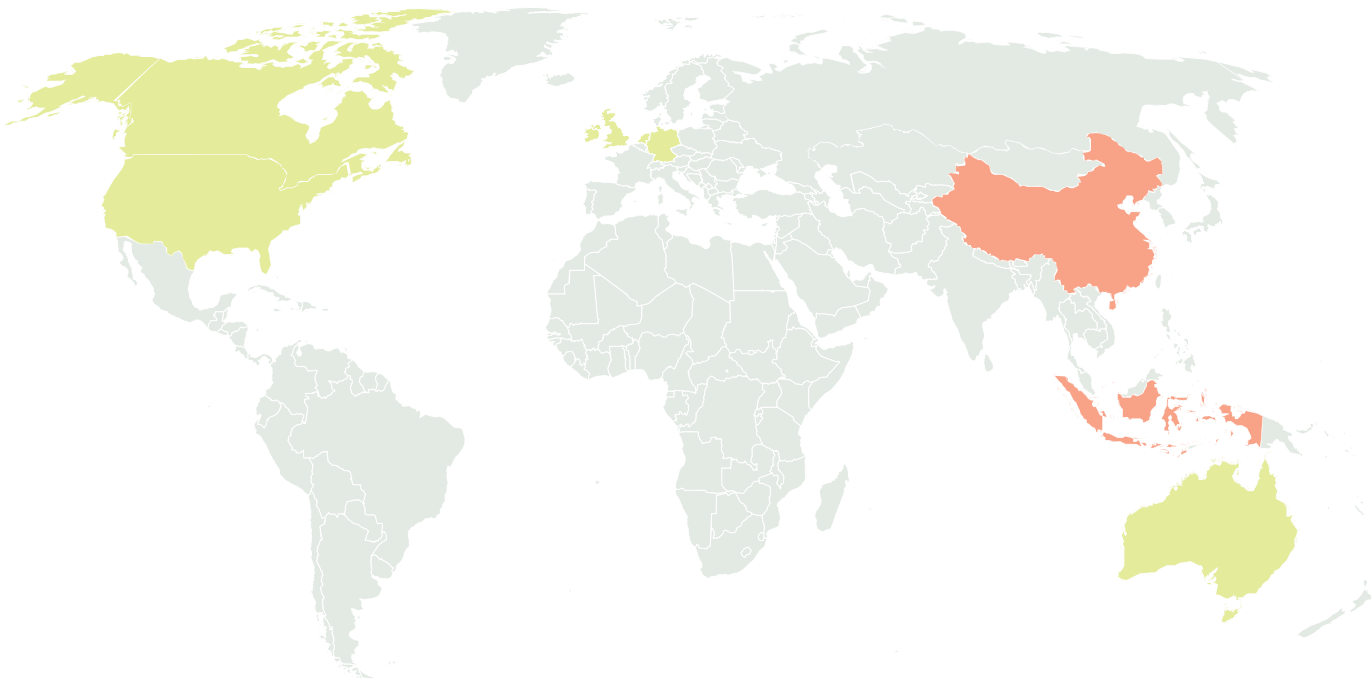
The University also acknowledges the intersections of modern slavery risk with other compliance obligations, such as child safety. With the appointment of a Child Safety Advisor, work in 2025 will include developing a better understanding of child safety across the University, and particularly the risks around modern slavery.

Controlled entities

The University's controlled entities are not located in any of the top 10 countries with the highest prevalence of modern slavery, as identified in the 2024 Global Slavery Index published by WalkFree. However, five entities reported activities in several countries within the Asia-Pacific region - including India, Pakistan, China, Papua New Guinea, Philippines, Malaysia, Lao PDR, Cambodia, Thailand, Indonesia and Vietnam. These regions have a high incidence of modern slavery practices, such as debt bondage among migrant workers, hereditary forms of bonded labour, forced marriage in South Asia, and state-imposed forced labour.⁴ The University acknowledges that these entities' activities in the region heighten their exposure to modern slavery risks, increasing the potential for exploitation and related practices to occur.

⁴ Global Slavery Index/Regional Findings – Modern Slavery in Asia and the Pacific, [Asia and the Pacific](#) | Walk Free

Modern slavery risks in University supply chain



Supply chain overview

The University operates a multifaceted and extensive supply chain. The University acknowledges the inherent risks of modern slavery existing within its supply chain and that these risks can be amplified by factors, including the geographic origin of products and materials. The University also acknowledges that limited transparency in certain international markets heightens the potential for modern slavery, especially within the lower tiers of the supply chain and in the procurement of raw materials. High-risk sectors such as research consumables and equipment have been identified as a particular focus given the specialism of these products to the University sector.

In 2024, research equipment accounted for 3.2 per cent of total University spend with 896 suppliers (6.6 per cent of total suppliers), while research consumables accounted for 2.9 per cent of total spend with 2778 suppliers (20.5 per cent of total suppliers). These categories are particularly vulnerable due to the complexity of their supply chains and geographic risk due to manufacturing in areas with weak labour regulations and high risk of forced and child labour. Visibility of suppliers with potential modern slavery risk, due diligence and potential mitigation measures have been improved in 2024 through the supplier onboarding process uplift and commencement of the AUPN sector risk approach.

2024 country spend breakdown – direct spend

Top 10 countries of spend	Country risk level*	% of 2024 spend
Australia	Low	97.18%
United States	Low	1.30%
United Kingdom	Low	0.48%
Netherlands	Low	0.36%
Germany	Low	0.24%
Singapore	Low	0.13%
Indonesia	High	0.09%
Canada	Low	0.06%
China	High	0.03%
Ireland	Low	0.02%

*Based on Global Slavery Index

High risk supplier Level 1 category spend breakdown

Risks in the University of Melbourne’s supply chain
Works contractors 6.7% of total spend 149 suppliers 1.1% of total suppliers
Research equipment 3.2% of total spend 896 suppliers 6.6% of total suppliers
Research consumables 2.9% of total spend 2778 suppliers 20.5% of total suppliers
IT hardware 2.1% of total spend 72 suppliers 0.5% of total suppliers
Facilities management 1.9% of total spend 95 suppliers 0.7% of total suppliers
Office consumables 0.9% of total spend 1017 suppliers 7.5% of total suppliers

Controlled entities

Annual surveys are undertaken with controlled entities to systematically identify and assess modern slavery risks within their operations, with specific questions focused on supply chains. All controlled entities have been engaged with identifying risks in their supply chains on an ongoing basis, with annual reviews supplemented with University training resources to enhance risk identification and mitigation efforts.

In 2024, supply chain risks were assessed through a survey conducted by a third party modern slavery survey provider, as well as through discussions between the controlled entities and University Governance team. In the follow-up meeting with the survey provider to discuss the results, and in subsequent discussions between the University and the controlled entities, no high-level supply chain risks were identified.

Investments

In recognition of the Australian Modern Slavery Act 2018, the University’s Implemented Consultant JANA has an approved Modern Slavery Policy. As part of adherence to this policy, JANA monitors the modern slavery considerations of our underlying investment managers through regular questionnaires and engagements.



5. Actions taken to assess and address risk

Research

A comprehensive due diligence assessment is conducted on the research activity for all relevant partner(s) that operate in a sensitive jurisdiction, or where domestic partners operate in higher risk industries, and for corresponding reputational or compliance risks. This process is triggered when a contracts or grants officer is reviewing a grant proposal or research agreement. Within this process, individual partnerships are reviewed for potential modern slavery risks related to technology or research activity, or evidence of complicity in modern slavery by the research partner. If any modern slavery risks identified in the assessment can be adequately managed, the agreement is signed by an appropriate officer of the University, as defined in the University's Delegations Framework. This provides an additional level of oversight.

If there are reputational concerns, including modern slavery risks, identified in a research agreement that are unable to be managed within tolerance, the project is escalated to the faculty and the Research Due Diligence Advisory Group for consideration and advice. The Research Due Diligence Advisory Group is composed of senior representatives from areas across the University and is chaired by the Deputy Vice-Chancellor (Research). There were no matters escalated to the Advisory Group related to modern slavery risks in 2024.

Students

In 2024, the University built on its commitment to support students and enhance its assessment and addressing of modern slavery risks, with the following initiatives:

- The establishment of a Student Placements Working Group and emerging recommendations to further improve consistent adoption of systems, processes and communications to minimise risk to students, hosts and the University. In particular, the working group has established a risk register that highlights the need for universal reporting and monitoring of student incidents in placement settings and improving the incident reporting and complaints handling process more consistently across the University. The working group has also identified the need for universal preparation of students for their placements. Current learning modules on the University's Learning Management System are utilised by some but not all faculties.
- A SASS Volunteering Framework that clarifies what a volunteering opportunity is and distinguishes this from paid and non-paid experiential opportunities. This framework will help various departments with clearly identifying opportunities for which students must be paid and the work conditions required for such work.
- Active involvement in the Red Cross Work Rights Hub and Migrant Justice Institute survey to better understand international students' perception and awareness of modern slavery. Over 200 University of Melbourne students participated in the survey and the findings are to be released early in 2025. This will identify improvements to further enhance student understanding of workplace rights and help-seeking options. The Work Rights Hub collateral will be distributed to students once endorsed and released to the University with the potential to participate in a work rights week later in 2025.

In addition, the University continued to review existing work-ready training for the Students@Work programs (internships and casual employment) and compliance training for hiring managers of student employees. This will ensure students are aware of their work rights when engaged as employees of the University, and that hiring managers are trained to ensure those work rights are adhered to.

Supply chain

During 2024, the University continued to address high-risk suppliers primarily through direct management of its Tier 1 suppliers. This includes integration of the University's Supplier Code of Conduct (the Code) in the University's supplier onboarding process and continued inclusion of modern slavery clauses in the University's standard goods and services contracts. The Code expects that suppliers ensure their own supply chains adhere to established standards regarding human rights and labour practices including dissemination of the Code to their affiliates, suppliers and subcontractors involved in supporting their provision of goods and services to the University. Standard University contracts for goods and services require that suppliers take reasonable steps to identify, assess and address the risks of modern slavery within their operational practices and the supply chains used in supplying to the University.

Key improvement actions in 2024 included:

- Supplier onboarding uplift, a project that focused on effective risk identification and mitigation, including modern slavery due diligence. See Section 6 for more detail.
- Sector collaboration leveraged collective resources and fostered expertise to effectively identify, manage and remediate modern slavery risk and share better practise. This included ongoing participation in the AUPN Anti-slavery Program, joining the UN Global Compact Modern Slavery Community of Practise and connecting with the Property Council Modern Slavery Human Rights and Modern Slavery Working Group Chair. Specific AUPN collaborative sector risk and incident management approaches are outlined further at Section 6.
- Uplift of the University's standard modern slavery clauses to include a notification requirement for suppliers to report any actual or suspected modern slavery practices to the University. The updated clause was embedded in the University's standard procurement contracts that did not already include such a requirement.
- Improved tender questions to better identify modern slavery risk and appropriate mitigations.

Controlled entities

All subsidiaries have been engaged on an ongoing basis in assessing and addressing modern slavery risks, with annual reviews supplemented by targeted support from the University's resources to enhance risk identification and mitigation efforts. Conversations with subsidiaries have confirmed that training and assessment of supply chain risk is being regularly undertaken and that resources, such as the Supplier Code of Conduct, have assisted in outlining minimum standards in this regard.

Investments

The University's Implemented Consultant JANA developed a modern slavery questionnaire and requires all investment managers to complete this on a regular basis. The questionnaire was developed with the objective of understanding how each manager incorporates modern slavery risks at both the organisational level and as part of their investment activities to ascertain how the investment managers integrate, engage on and manage modern slavery risks. The responses support the University in outlining how its investment managers are considering modern slavery risks when managing investments on its behalf.

The University acknowledges that the identification of modern slavery risks is somewhat challenging for some sub-asset classes, such as securitised fixed interest and alternatives. While modern slavery risks are not entirely absent from these investments, assessment and identification is challenging.

Case study: Melbourne Business School's (MBS) assessment and management of modern slavery risks in its overseas operations and supply chain

MBS has implemented robust measures to ensure that modern slavery risks in its operations, including overseas operations and supply chains, are well assessed and addressed through a structured compliance framework, including:

- **Mandatory modern slavery training:** All staff with purchasing delegations must complete modern slavery training. MBS conducted a due diligence assessment on the best training for them with respect to modern slavery compliance and uses Safetrac as its training provider.
- **Supply chain and procurement compliance:** For at least six months, MBS has been including modern slavery clauses by default in all supply and procurement contracts, ensuring alignment with the University of Melbourne's standard modern slavery clause. Additionally, MBS is subject to modern slavery clauses when acting as a supplier of services to Federal Government agencies.
- **Overseas suppliers:** MBS performs due diligence on any overseas suppliers confirming that any residual risks are manageable and acceptable.
- **Subsidiary operations in Malaysia:** MBS operates a wholly owned subsidiary in Malaysia with approximately 10 employees delivering training. These employees are subject to the same mandatory modern slavery training requirements as the Australian-based team. The team in Malaysia has been provided with a template modern slavery clause to use in procurement contracts in Malaysia.
- **Ethical sourcing of merchandise:** MBS has taken proactive steps to ethically source its merchandise (e.g. caps, water bottles) by conducting due diligence and only engaging ethically rated/accredited suppliers.

These actions demonstrate MBS' commitment to strengthening risk mitigation and ethical sourcing across its global operations, ensuring that modern slavery risks are identified and addressed in line with the University's governance framework.

In 2025, the University will provide additional guidance to subsidiaries about supply chain risks and will further promote its Supplier Code of Conduct. The University will also assist with the provision of template clauses for supplier tender and contract documents where needed.



6. Effectiveness of University actions

Research

The RIC function continues its commitment to developing and maturing its processes to identify and mitigate modern slavery risk in research-related activities. Currently, checks for modern slavery are relatively simple, and the University will seek to refine its review of foreign grants and research agreements by incorporating a risk assessment at the individual research partnerships level to target modern slavery risks. The risk assessment involves checks for partner suppliers, industry sectoral participation and a research activity's susceptibility to modern slavery practices.

In 2024, RIC conducted 355 partner risk assessments which included checks for modern slavery risks and implemented modern slavery risks training as part of the onboarding process for new staff.

In 2025, the University will implement new Research Management and Enterprise Resource Planning systems. RIC aims to ensure there are systems-based flags to trigger comprehensive due diligence assessments.

Students

- There was 99 per cent completion of compliance training (supervising casual professional staff) by hiring managers in SASS. This means as an employer of students, hiring managers are trained in work rights and conditions expected for student employees and this mitigates the risk of workplace exploitation.
- The Students@Work Work-ready Training was reviewed and significantly uplifted with a focus on respect and compliance at the University as a workplace. The training module went live for students in November 2024. This training module is mandatory for all student employees and aims to clarify a student's work rights during their employment at the University.
- A promotional campaign supporting the Migrant Justice Institute migrant worker research survey targeting international students' experiences or problems in the workplace and understanding of workplace rights resulted in 207 University-specific responses. In April 2025, a University-specific report will be available with details of our students' experiences in the workplace and levels of understanding and awareness around rights and help seeking. This report will inform enhancements/improvements and priority focus areas for the University to improve its support services.
- Initial planning has been done to assess the best way to capture student voices and student feedback on the effectiveness of modern slavery activities for 2025.
- We commenced informed development of a Work Rights Hub (as a member of the AUPN and Red Cross collaborative working group) which includes education and triaging for international workers. In 2025, this Hub will be embedded within University-led initiatives such as Employability Week.



Supply chain

In 2023, the University committed to developing and trialling transparent processes for high-risk supply chains, while measuring effectiveness through mapping, gap identification and continuous review mechanisms. This was addressed through 2024 activities that will continue into 2025 as outlined below.

1. Supplier onboarding uplift:

- The 2023 retrospective third-party risk profile assessed 49,000 suppliers for inherent modern slavery risk, with 41 determined to be potential high risk based on geographic location and procurement category. In 2024, this work was deepened with an extended supply chain review that identified seven suppliers with potential high modern slavery risk in the research consumables category, a focus category for the University. The review aimed to gain deeper understanding of the supplier's modern slavery awareness, supply chain management and due diligence approach. Learnings highlighted the difficulty in obtaining information retrospectively from suppliers (after delivery and payment for goods and services) and reinforces the University's current approach to focus risk identification and mitigation efforts at supplier onboarding.
- The risks associated with these 41 suppliers have been managed through further due diligence to determine their ability to identify and mitigate modern slavery risk.
- In 2024, an integrated supplier onboarding process was implemented.
- Manual desktop risk assessments were initially trialled for 60 new supplier onboarding requests, including inherent modern slavery risk based on geographic location and industry, modern slavery and human rights violation allegations, and sanctions using a risk assessment tool.
- In 2024, as an output of the supplier onboarding uplift design, the first phase of implementation included all research suppliers, selected as a focus as it was evaluated to be the University's highest risk category. In the second phase, this was broadened to include technology suppliers.
- 18 of the 60 suppliers that were assessed as medium and high risk subsequently had further due diligence undertaken to gain insight into their ability to identify and mitigate modern slavery risk. Supplier responses were reviewed by the Procurement Environmental Social Governance Lead in Procurement Services.
- While no sanctioned suppliers or adverse allegations were found through the trial, stronger controls were implemented for those with high residual risk i.e. high-risk contract clauses.
- The process has been rolled out for all new supplier onboarding requests from 2025, and a planned review will assess potential gaps in suppliers onboarded that were not included in the 2024 onboarding trial.

2. AUPN sector risk approach (research consumables):

- 2024 actions focused on establishing a working group and commencing high-risk medical equipment and laboratory supplies self-assessment questionnaires (SAQ)
- SAQs were sent to 72 medical equipment and laboratory suppliers, of which 47 responded
- Five suppliers were then identified to pilot a collaborative continuous improvement plan approach in 2025, with a focus on risk opportunities identified in the 2024 SAQ responses.

Case study: AUPN sector incident response

- In 2024, a University supplier was identified as potentially high risk for modern slavery through the AUPN Anti-slavery Program's risk management service. This flagging was due to potential connections with sanctioned suppliers.
- The University led a response on behalf of four other universities who also used the supplier, requesting information regarding their interactions with flagged sanctioned suppliers.
- The supplier's investigation revealed no direct or indirect transactions with sanctioned entities.
- This scenario provided the University and AUPN members the opportunity to formulate a co-ordinated response approach to a potential modern slavery incident. Improvement opportunities learned through the management of this scenario include updating University incident response process documents and sharing with relevant stakeholders to ensure effective replication in future high-risk management scenarios.
- The University has also recommended that AUPN review the process for escalation and understanding high-risk triggers to better address potential risk and consideration of improving coordination of multi-University responses.

Controlled entities

The University’s Controlled Entity Policy came into effect in 2024 and provides for a consistent reporting framework in areas such as financial management, risk management and policies and procedures against which to measure controlled entity activities. Governance requirements relating to modern slavery include the adoption of policies in a range of matters including a Whistleblower Protection Policy and a Fraud and Corruption Management Policy. University controlled entities are also required to report their risk management frameworks and risk registers to the Executive Director, Risk and Assurance, to increase University oversight of controlled entity risks and mitigations, including those relating to modern slavery.

In 2024, the University used a third-party modern slavery survey provider to survey its entities and assess modern slavery risk. In the follow-up meeting with the survey provider to discuss the results, the University was advised that no high-level risks were detected. The survey, together with follow-up discussions between the University and the entities about modern slavery risks and information sessions provided for entities, have resulted in a more thorough understanding of modern slavery and will inform the 2025 activities.



7. Consultation with controlled entities

The University's controlled entities were consulted in preparation of this statement and share our commitment to addressing modern slavery risks. Following the completion of the annual modern slavery survey, the University of Melbourne communicated with controlled entities to evaluate the potential for modern slavery practices within the entities and to gain insights into the risk mitigation strategies employed by each entity.

The responses contained valuable information including:

- Geographical location of operations and suppliers
- Identification of due diligence practices and risk mitigation strategies

All entities were asked to provide information about the risk of modern slavery within their operations and supply chain, and describe actions taken to identify, address and monitor these risks.

Training was offered to all staff involved in procurement and engagement of groups or individuals in other countries. As part of the implementation of the University's Controlled Entity Policy in 2024, an information session was held covering reporting and compliance obligations including modern slavery, and modern slavery information resources were provided.

Modern slavery risk management activities over the next 12 months will include:

- Regular information and training sessions to foster ongoing compliance with the Controlled Entity Policy, including in relation to Modern Slavery
- An online modern slavery training program for the staff of controlled entities to assist with their modern slavery risk mitigation activity.

The working group will also continue to engage with controlled entities to ensure robust policies and practices are in place to mitigate modern slavery risks.

8. Any other relevant information

During the reporting period, the University's ongoing modern slavery program continued its close monitoring of the Government's review of modern slavery legislation and will continue to do so in 2025 to effectively address any legislative changes.





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