

Bond University Modern Slavery Act Statement

2024

Bond University
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Australia

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Our commitment to Australian Aboriginal and Torres Strait Islander people

Bond University acknowledges the people of the Yugambeh language, upon whose ancestral lands our University now stands, and celebrates the contribution that Aboriginal and Torres Strait Islander people make to our institution.

Bond University has a long-standing and deeply embedded commitment to building strong relationships with the Aboriginal and Torres Strait Islander communities, with the primary goal of improving educational opportunities and providing culturally safe and supportive learning environments for our Indigenous students.



Introduction

Modern slavery is a persistent and deeply rooted global issue, encompassing forced labour, forced marriage, servitude, debt bondage, and child labour. These forms of exploitation thrive on coercion, stripping individuals of their freedom, rights, and dignity. Too often, modern slavery is hidden in plain sight, embedded in the products we buy and the services we use—often without awareness of the human cost involved.

According to the Global Slavery Index 2023 by Walk Free, an estimated 50 million people were living in modern slavery on any given day. In Australia, while we rank second globally for our government's response—including the enactment of the Modern Slavery Act 2018 (Cth)—approximately 41,000 people, or 1.6 per 1,000, are still estimated to be living in conditions of modern slavery.

Bond University remains unwavering in its commitment to combating modern slavery. We are dedicated to upholding the rights and wellbeing of all individuals within our sphere of influence—through our staff, students, suppliers, and collaborative efforts with peers across the Australian University Procurement Network (AUPN)

Bond University is proud to present this Modern Slavery Statement for the period January to December 2024. Aligned with our financial reporting year and in accordance with the Modern Slavery Act 2018 (Cth), this statement underscores our steadfast determination to address modern slavery and promote ethical practices within our operations and beyond.



Part A – Reporting entity (Criterion 1)

Bond University was founded in 1989 as Australia's first private, not-for-profit university and, in 2024, was ranked as the Top university for Teaching in the Australian Financial Review Rankings and within the top 50 in the world by the Times Higher Education (THE) Young University Rankings list. In 2024, the University, on average, enrolled 4,356 students each semester, employed 1,387 staff each month, and generated an annual turnover of circa \$255 million.

The Modern Slavery Act's reporting requirement applies to large businesses and other entities in the Australian market with annual consolidated revenues of at least AUD \$100 million.

ABN: 88 010 694 121

Registered Address: 14 University Drive,
Bond University,
QLD 4229



Part B – Structure, operations, and supply chains (Criterion 2)

Structure

Bond University Limited is incorporated as a company limited by guarantee. Pursuant to the constitution of the company, the Membership of Bond University Limited comprises 30 members, drawn from alumni, staff, students and the external community.

The University has three campuses located in Australia. The University's controlled entities are Campus Operations Pty Ltd (100% ownership) and Lashkar Pty Ltd (100% ownership). Campus Operations Pty Ltd operates student accommodation including food and beverage facilities. Lashkar Pty Ltd holds and manages properties for the University, including the Bond Institute of Health and Sport buildings located in Robina, Queensland. Risk assessment, reporting and data presented within this statement is for the consolidated group.

For the purposes of the Modern Slavery Act, the Bond University Council is the principle governing body operating as the Board of Bond University Limited. Comprising 10 councillors, the Bond University Council is accountable to university stakeholders and the wider community to ensure the University is managed prudently, efficiently, and in compliance with all relevant regulations. Council leads the University's community of students, staff and others to meet and advance the University's goals and objectives. Apart from the Vice Chancellor, all Councillors are non-executive and are elected based on the skills and experience they bring to the Council. Bond's Constitution provides for the rotation of Councillors, whereby no Councillor may serve for more than the maximum term allowed under the Constitution being eight years.

The University is organised into five academic groups being:

- Bond Business School
- Faculty of Health Science and Medicine
- Faculty of Society and Design
- Faculty of Law
- Transformation CoLab

A comprehensive array of professional administration services supports the University's students, staff and teaching, learning and research activities.

Operations

As Australia's first private not-for-profit university, Bond University seeks to be recognised internationally as a leading independent university, imbued with a spirit to innovate, a commitment to influence and a dedication to inspire tomorrow's professionals who share a personalised and transformational student experience. As a not-for-profit entity, the institution reinvests its surplus from operations back into the University.

In 2024, the University continued expanding its Medicine program and community-accessible health clinics within the new state-of-the-art Allied Health facility to support innovative teaching and learning in health-related fields.

In 2024 operations are summarised as below

- Revenue - \$254 million
 - \$221 million Student Tuition and Research income
 - \$9 million Student services/Amenities/Accommodation
 - \$8.5 million Food and Beverages
 - \$8.5 million Investment Income
 - \$3 million Donations/prizes
 - \$1 million Consultancy
 - \$3 million Other
- Operational Expenditure \$228.5 million
 - \$162 million Employee Expenditure
 - \$66.5 million Other Operational Expenditure
- Property, Plant and Equipment (Excluding Land) - \$13 million

Teaching delivery occurs across three campus locations consisting of the main campus on the Gold Coast, an institute specialising in Allied Health within proximity of Robina Hospital, and a Brisbane site focused on postgraduate and executive education. Almost 100% of tuition revenue generated requires in-person, face to face delivery at these campus locations with online material being supplemental only. Bond University manages and owns all food and beverage outlets and accommodation facilities on campus.

Supply Chains

Supporting the operations of the University requires purchasing of a diverse range of goods and services from a wide range of suppliers across many categories including staffing. The University is committed to purchasing in a responsible manner, proactively supporting local and indigenous first nations suppliers where possible to leverage our supply chain for positive social change within our sphere of influence.

Procurement Supply chains (excluding salaried staff)

The University has made a considerable investment in collaborating with the Australian Universities Procurement Network (AUPN) to ensure its spend categories align with their uniform reporting taxonomy. Through sharing data, the AUPN facilitates aggregated spend analysis, bench marking, reporting and transparency across the Higher Education sector, including through the implementation of a supplier risk portal.

At the highest level there are four categories. These four categories have been built up from a granular level consisting of a mapping exercise of 300+ base level categories.

1. ***Property and Facilities*** - Maintenance and construction of buildings and facilities - All university facilities and buildings are located on the Gold Coast and Brisbane.
2. ***Research and Teaching*** - Procurement to support delivery of innovative and agile teaching and learning including student placements, library/laboratory services and direct teaching expenses.
3. ***Business Services*** - Professional services such audit and insurance, marketing and media, travel, office related supplies, storage and logistics.
4. ***Technology*** - Environments with the increasing use of technology and online platforms including expenditure on IT hardware, audio visual, software and telecommunications.

The Australian university sector spend in 2024 was approximately \$12.8 billion across 91,000 unique suppliers. Bond University procurement spend (operational expenditure and asset purchases excluding land purchases and financing costs) was \$76.78 million across 1,809 unique suppliers.



OPEN DAY

OPEN DAY

TO
Open
Day!



Part C – Risks of modern slavery practices in operations and supply chains of the University and subsidiaries (Criterion 3)

Risks in Operations

Bond's primary source of revenue is generated from tuition revenue and the main input to deliver this operation is salaries. Comprising 71% of operational expenditure and engaging approximately 1,400 staff each month, predominantly domiciled in Australia, salaries are Bond's single largest expenditure item. The Bond University Act 1987 makes provision for two staff associations. Professional staff are engaged under a Collective Agreement in the Federal jurisdiction and a negotiated agreement (MOU) between the University and Staff Association. Academic staff are covered by a Federal Award and a negotiated MOU.

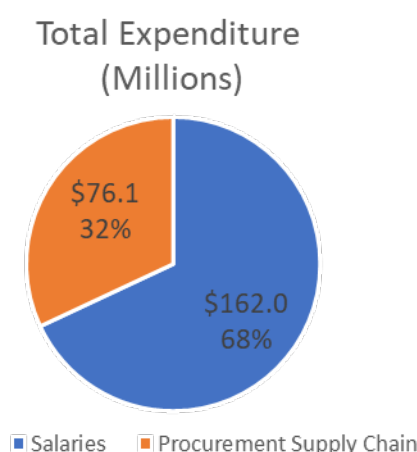
Location of employees in 2024

NSW	QLD	SA	WA	OVERSEAS	TOTAL
2	1,382	1	1	1	1,387

With operations based primarily in Australia, the University assesses the risk of modern slavery to be low. This assessment is supported by several key factors: the in-house delivery of auxiliary services—including accommodation, food, and beverage outlets—which is atypical within the sector; a highly educated workforce; staff employed under applicable Awards, Collective Agreements, and MOUs; and oversight by a professional central HR team. Additionally, only a small portion of services such as cleaning and security are outsourced, and these are contracted through reputable suppliers who also report on modern slavery.

Risks in Subsidiaries

The University's subsidiary entities, Campus Operations Pty Ltd and Lashkar Pty Ltd, are 100% owned and managed by Bond University Ltd. This statement is for the consolidated group.



Risks in our Supply Chain



~\$76.1 million



1,800+ Suppliers



40 Countries

There are greater risks within the University's supply chain compared to operations given the diverse range of products and services procured. Bond University's Modern Slavery Framework identifies three primary risk factors (Country, Category and Spend) that have and will continue to apply to our risk methodology and our overall supplier risk rating. This framework assists in developing a more targeted and impactful strategy to combat human rights violations.

Country Risk - Level of risk or vulnerability that a country exhibits concerning the prevalence and enforcement of laws related to modern slavery. The Global Slavery Index (GSI) ([Walkfree Org](#)) is a tool that assesses and ranks countries based on their efforts to address modern slavery and the prevalence of modern slavery within their borders. Total Vulnerability rating is weighted at: Low 0-25, Medium 25-50, High 50-75, Very High 75-100.

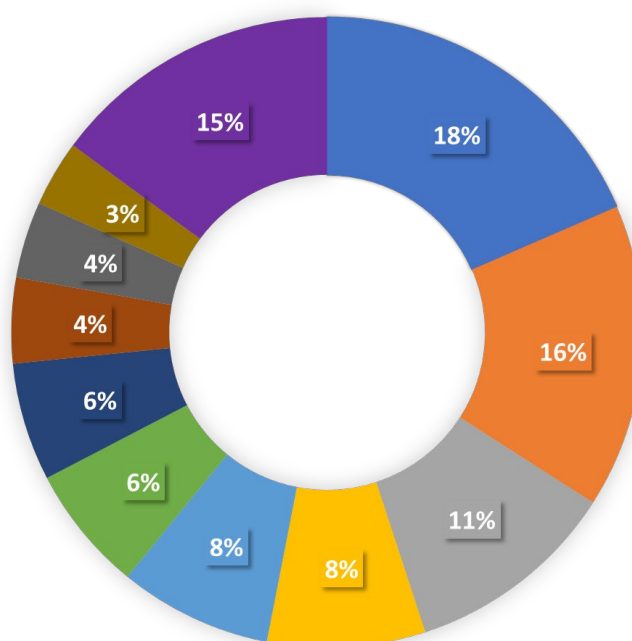
Over 96% of Bond's expenditure is directed to low-risk countries. The table below summarises our supply chain expenditure based on the head office location of the supplier. The only high-risk country identified below is the Solomon Islands, where Bond partners with the Kirakira Hospital on Makira Island to provide health services and clinical experience for our medicine students.

Country	Global Slavery Index rating*	Expenditure	%
Australia	Low	67,319,703	88%
United States of America	Low	2,340,157	3%
Ireland	Low	1,523,576	2%
Netherlands Antilles	Medium	1,483,691	2%
United Kingdom	Low	899,696	1%
Canada	Low	782,621	1%
Solomon Islands	High	314,672	0%
China	Medium	312,078	0%
Sweden	Low	300,655	0%
Denmark	Low	255,115	0%
Other (30 Countries)		592,171	1%
Total		76,124,136	100%

Category Risk - Level of risk associated with specific categories or sectors where modern slavery is prevalent or has a higher likelihood of occurrence. Each of the 300+ base level expenditure categories have been assigned a low, medium, or high rating. Risk ratings have been developed in conjunction with the AUPN using sources including the Global Slavery Index, The Responsible and Ethical Private Sector Coalition against Trafficking ([RESPECT](#)) and the NSW Anti-Slavery Commissioner [GRS Inherent Risk Identification Tool](#) and industry consulting specialist ArcBlue.

The Universities spend breakdown per category in 2024 was as follows.

Category		Low	Medium	High	Total	% of total procurement spend
	Marketing & Events	44,423	8,048,936	5,972,613	14,065,972	18%
	IT Services			11,874,073	11,874,073	16%
	Facilities Maintenance	288,998	991,814	7,010,201	8,291,012	11%
	Infrastructure			6,163,850	6,163,850	8%
	Student Services	819,911	5,141,598		5,961,508	8%
	Corporate Services	2,225,927	6,759	2,689,331	4,922,018	6%
	Library Services		4,061,138	549,122	4,610,260	6%
	Contracted Services/Advice	2,873,043		456,680	3,329,723	4%
	IT Hardware			2,991,304	2,991,304	4%
	Security Equipment & Services			2,579,347	2,579,347	3%
	Other	362,455	4,879,884	6,092,729	11,335,068	15%



Spend Risk - Level of risk weighted per supplier at Low for \$0-10,000, Medium \$10,000-50,000, High \$50,000-100,000, Very High >\$100,000.

Overall Procurement Supply Chain Risk Rating - The risk ratings for country, category, and spend are consolidated into overall risk rating with category having a significant higher weighting. Overall Risk Rating = (Category*5) x Country Risk x Spend Risk.

In 2024, the overall risk profile showed 61% of the University’s procurement spend was rated in the second highest risk category. When benchmarked against the other Universities within the AUPN with a total procurement spend of \$12.8 billion, the Bond profile was found to be consistent with variations of less than 10%. This highlights the risk that modern slavery could exists behind many items procured by universities within Australia. At Bond, the overwhelming majority of that spend goes to Australian entities that share our commitment to combatting modern slavery. However, the risk remains deep within the raw materials and manufacturing supply chain.

Overall Procurement Supply Chain Risk Rating

Risk Rating	Expenditure	%
Very High	990,386	1%
High	46,464,191	61%
Medium	581,827	1%
Low	28,087,733	37%
Total	76,124,136	100%



Part D – Actions taken to assess and address risks (Criterion 4)

Bond University undertakes the following actions to assess and address modern slavery risks in our operations and supply chain.

Supplier Media Monitoring and Collaboration with AUPN

A supplier media monitoring process has been implemented. Bond University is a member of the Australian Universities Procurement Network (AUPN), a collaborative group comprising 38 Universities, and the Modern Slavery Working Group (MSWG). All AUPN member universities actively contribute resources and data in relation to Modern Slavery. This collaborative approach engaged industry expert [FRDM](#) (pronounced Freedom) who are a specialist in supply chain risk management software. This software monitors and provides notification services of modern slavery reported within the media throughout the world. Bond University proactively manages its supply chain, dealing primarily with known, regular suppliers and in 2024 of the 1,495 suppliers with ABN's engaged no suppliers of goods or services to Bond University were identified.

High Risk Rating Reviews

As highlighted in the Category Risks section, IT Services represent Bond University's largest high-risk category of expenditure in 2024. The university is acutely aware of the increased risks inherent in the IT Services category due to the wide range of materials and inputs procured for technology equipment, as well as the transition from software on in-house local servers to SaaS cloud-based storage and support.

To address these risks, Bond University has engaged Electronics Watch.org for a pilot project in 2025. This initiative aims to gain a deeper understanding of the factories where our high-volume IT infrastructure is manufactured. By doing so, the university seeks to improve its risk assessment processes, mitigate potential risks, and provide remedies for workers who have experienced harm.

Furthermore, Bond University's membership in the University Procurement Hub (UPH) enhances its ability to influence upstream supply chains. Initially utilized for leveraging purchasing power to achieve better pricing, this collaboration now also focuses on preventing modern slavery. By working together with other institutions, Bond University can

exert significant influence to ensure ethical practices and safeguard workers' rights throughout the supply chain.

Reviews of other high risk rated expenditure areas were undertaken. The vast majority of these are existing suppliers and expenditure has not materially changed compared to prior reporting periods, hence prior period supplier surveys and supply chain mapping remain active. Contract renewals incorporate updated contracts specifically referencing Modern Slavery commitments. Although suppliers may be classified as high risk in our internal risk rating due to the inherent category risk, Bond University is comfortable that the organisations we have engaged with have strong governance structures, high ethical standards and are endeavouring to identify and eradicate Modern Slavery within their supply chains.

Training and Education

Bond University has continued to enhance its custom in-house training material in 2024, expanding its reach beyond key procurement staff to include a broader range of staff members. In 2024, the university introduced three new initiatives to further its commitment to combating modern slavery other than its own supply chain.

Student Education: It is recognised that international students are more likely to face criminal labour exploitation. During the September 2024 student orientation presentations resources from Australian Red Cross Student Work Right Hub were incorporated informing students and empowering workers and frontline responders about the risks of exploitation and avenues of support.

Staff Education: During Sustainability Week, a dedicated presentation on modern slavery was delivered to staff, highlighting the importance of sustainable practices and the role of staff in preventing modern slavery. Key procurement staff continue to be supported with continued professional development to ensure knowledge and skills are maintained and improved. Examples of such initiatives includes monthly AUPN modern slavery forums with expert guest speakers, training tools via the AUPN portal and case study presentations.

Community Education: CPA Australia Industry Presentation: Bond University collaborated with CPA Australia to deliver an industry presentation on modern slavery, targeting professionals and raising awareness within the broader community.

Guiding Policies and Procedures

Bond University has developed and maintains the policies listed below, which assist in addressing overarching risks of modern slavery within our operations and supply chains. Procurement guides for tendering incorporate specific assessment of modern slavery.

- Ethical Conduct
- Code of Conduct
- Conduct for Working with Children and Young Persons
- Public Interest Disclosure
- Sexual Exploitation, Abuse, Assault and Harassment
- Human Research Ethics
- Bullying and Harassment
- Workplace Health and Safety
- Procurement
- Student Regulation and Code of Conduct

Part E – Assessment of the effectiveness of actions (Criterion 5)

Bond University is committed to enhancing our processes to tackle the challenging and complex issue of modern slavery. Monitoring and reviewing the progress of our initiatives to eradicate modern slavery from our operations and supply chains is crucial for enhancing our approach over time and addressing emerging issues. In pursuit of this goal, evaluation of our approach throughout 2024 against our Action Pillars are summarised below.

Action Pillar	Effectiveness
Understand the Legislation	No legislation changes have occurred in 2024. Bond University understands the intent of the legislation and takes action to continue to comply and support making a genuine impact on modern slavery.
Engage with Industry Experts	Continuing engagement throughout 2024 with AUPN, ArcBlue, FRDM and the UPH (University Procurement Hub) provides the University with access to specialist advisors, synergies to seek in depth supply chain data and the ability to influence suppliers to ensure modern slavery is eliminated.
Procurement Process & Policies	Our procurement and tender guidelines incorporate specific assessment when conducting new tenders to ensure compliance with the Act. In 2024 training and education extended to students and the business community.
Ongoing Supplier Analysis	Continuously monitoring and evaluating suppliers to identify and mitigate risks related to labour practices and human rights violations has continued throughout 2024. The university believes there is a culture that promotes ethical sourcing and corporate responsibility, safeguarding the rights and well-being of workers throughout its supply chain.

Part F – Consultation (Criterion 6)

The University's subsidiary entities, Campus Operations Pty Ltd and Lashkar Pty Ltd, are 100% owned by Bond University Limited and management across the three entities are consistent. The risk assessment, reporting and data for this statement is for the consolidated group.



Part G – Other information and conclusion (Criterion 7)

Bond University is proud of the meaningful progress made in our ongoing efforts to address modern slavery and remain firmly committed to expanding our impact beyond the supply chain. We actively collaborate with stakeholders across academia, industry, and government to amplify our collective efforts and drive broader, systemic change.

As part of our continuous improvement, we are focused on several key areas:

1. **Strengthening Supplier Assurance:** We are enhancing the maturity of our supplier assurance program and deepening our understanding of supply chain dynamics to better identify and mitigate modern slavery risks. In 2025 this includes understanding the factory location of high-volume IT hardware such as laptops and via external agency monitor these factories.
2. **Expanding Education and Awareness:** As an education institute our sphere of influence is significant. Increasing awareness across our community—including students, staff, suppliers, and contractors—is central to our strategy. In 2025, this continues to include:
 - a. Sharing academic research with industry partners to support better risk understanding and prevention.
 - b. Introducing tailored initiatives for international students engaged in part-time work, helping them understand their rights and obligations.
 - c. Developing a new micro-credential through the Beyond Bond program to educate students on modern slavery and empower them to identify and respond to risks in their future careers.
 - d. Continuing to enhance training and support tools for staff involved in assessing and responding to modern slavery.
3. **Refining Policies and Governance:** We are conducting regular reviews of university policies and procedures to align with best practices and evolving regulatory requirements, ensuring a robust governance framework.

By fostering a culture of vigilance, accountability, and collaboration, Bond University remains dedicated to advancing ethical practices and making a lasting impact in the fight against modern slavery.

Signed

A handwritten signature in black ink that reads "Tim Brailsford". The signature is written in a cursive, flowing style.

Professor Tim Brailsford
Vice Chancellor and President

This statement was approved by the council of Bond University Ltd.

