



Modern Slavery Statement

2025

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Acknowledgment of Country

UniSC is a place where Aboriginal and Torres Strait Islander people’s perspectives, culture and knowledge is acknowledged, valued, and respected. We share deep pride in, and seek to uplift, empower, and give a voice to Aboriginal and Torres Strait Islander people and perspectives.

If you are an Aboriginal and Torres Strait Islander person, we encourage you to join the long tradition of trailblazers at UniSC, impacting our University and our world.

We acknowledge the Traditional Custodians of the land on which we work and live, and recognise their continuing connection to land, water, and community. We pay our respects to Elders past, present and emerging.

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All amounts are in Australian dollars. University of the Sunshine Coast is registered on the Commonwealth Register of Institutions and Courses for Overseas Students. CRICOS Provider Number: 01595D.

Introduction

The Modern Slavery Statement for the University of the Sunshine Coast (The University or the University) sets out the actions taken to identify, assess and address risk of modern slavery across our operations and supply chain in the financial year ending 31 December 2025.

This statement is made in compliance with the *Modern Slavery Act 2018* (Cth). The purpose of this statement is to outline our commitment to be an ethically and socially responsible organisation committed to ensuring our practices combat slavery and human trafficking. We recognise our role in respecting and promoting the fundamental human rights of our people, suppliers and customers.

The University supports the Australian Government's global leadership in preventing modern slavery. By working with our sector, employees, contractors, partners and suppliers on processes and practices to effectively manage modern slavery risk. The University aims to create and maintain an environment in which there is no place for modern slavery, and to contribute to this achievement in the wider Australian community and in the global supply chains of Australian goods and services.

About modern slavery

Modern slavery (MS) is defined as slavery that involves exploiting other people for personal or commercial gain. It is a serious global issue and breaches human and labour rights. Modern slavery is an umbrella term for human trafficking, forced labour, child labour, forced marriage, debt bondage, removal of organs and other slavery like practices.

1 Reporting entity

The University is an Australian higher education institution which provides a wide range of teaching, research and education-related activities.

The University is established under the *University of the Sunshine Coast Act 1998* (an Act of Queensland Parliament) and is a statutory body as defined by the *Financial Accountability Act 2009*. The University is parent to a single wholly owned subsidiary, USC Capital and Commercial Pty Ltd, which was non trading during the relevant period and was deregistered in November 2025. Accordingly, the ownership of this entity is immaterial to this report.

2 Structure, operations and supply chains

Structure

The University was founded by its community in 1996 with the belief that opportunity is everywhere, especially in regional Queensland. As the first greenfield university to open in Australia since 1971, The University has helped unlock the innovation, productivity and potential of its regional communities.

Its impact on economic, social, cultural and environmental development is clear. With more than 20,700 students, over 85 programs in five campuses spread across Southeast Queensland and one in South Australia, 2,383 staff, the University has \$700 million invested in infrastructure and more than \$9 billion flowing into the local economy, including through the contributions of more than 42,900 graduates.

Academic schools

The University is organised into five academic groups:

- School of Business and Creative Industries
- School of Education and Tertiary Access
- School of Health
- School of Law and Society
- School of Science, Technology and Engineering

Executive committee

The University has six executive committee members:

- Vice-Chancellor and President
- Deputy Vice-Chancellor (Academic)
- Deputy Vice-Chancellor (Research and Innovation)
- Pro Vice-Chancellor (Global and Engagement)
- Chief Operating Officer (COO)
- Chief Financial Officer*

More information about UniSC, our activities and performance is available via the University's Annual Report and at unisc.edu.au

* At the date of this report the Chief Financial Officer was also performing the role of Interim COO.

Operations

We provide the hands-on learning and practical skills needed by the people of our diverse regions from Moreton Bay to the Fraser Coast: the nurses, teachers, mental health and medical professionals, environmentalists, scientists, engineers, lawyers, problem solvers, creators and creative thinkers, high-performance athletes, entrepreneurs and the leaders of tomorrow who improve the lives of people at home and abroad.

Campus locations

The University operates from six campuses in Australia:

- Sunshine Coast (Sippy Downs)
- Moreton Bay (Petrie)
- Caboolture
- Gympie
- Fraser Coast (Hervey Bay)
- Adelaide

Research and teaching centres

- K'gari Research and Learning Centre (Dilli Village)
- Thompson Institute (Birtinya, Sunshine Coast)
- Sunshine Coast Health Institute (Birtinya, Sunshine Coast)

The University's teaching operations are delivered in Australia through an on-campus experience complemented by technology-enabled learning. The University partners with industry, institutions and all levels of government to deliver innovative and high-quality research with real impact.

Research operations are largely undertaken in Australia with some overseas delivery, particularly in the Pacific and Southeast Asia regions.

Ranking

As a university with a strong commitment to achieving sustainability in terms of teaching, research and how we operate, we are the top ranked Queensland university in the 2025 THE Impact Rankings. The Times Higher Education Impact Rankings are the only global performance tables that assess universities against the United Nations' Sustainable Development Goals (SDGs) and measure the social and economic impact of an institution:

- The University ranked first place in Queensland in two categories – Zero Hunger and Climate Action – and second in Australia for Zero Hunger
- The University placed 7th globally in the Life on Land Category
- The University has five SDGs in the global top 25, and seven in the global top 100, six of which scored 100 from 100.

Among public universities, the University is number one in Queensland for undergraduate overall educational experience, and number one in Queensland for postgraduate teaching quality.

The University moved 97 places to be in the top 110 institutions in the prestigious Times Higher Education (THE) Young University Rankings (2024).

Students

In 2025, the University had a total of:

- 20,782 Students headcount (up from 18,911 in 2024)
- 3,426 International students (up from 2,291 in 2024)
- 773 First Nations students (up from 699 in 2024)
- 67 percent female students, 33 percent male students.

Staff

In 2025, the University had a total of:

- 2,383 staff (down from 2,386 in 2024)
- 1,400 are full time and part time (up from 1,321 in 2024)
- 983 are casual staff (down from 1,065 in 2024)
- 938 are Academic staff (down from 986 in 2024)
- 1,417 are Professional staff (up from 1,368 in 2024)
- two percent of staff are Aboriginal and Torres Strait Islanders.

Key facts

 **≈ 20,782** students

 **≈ 2,383** staff

 **5** schools

 **6** campuses

 **1,725** suppliers

Supply chains

The University purchases goods and services from a wide range of suppliers across a number of categories and countries. In 2025 we engaged with more than 1,700 suppliers across 44 countries. Our supply chain is varied and includes individuals, small-to-medium enterprises (SMEs) and multi-national organisations. We are committed to responsible purchasing and ensuring that the procurement practices of our suppliers avoid elements of modern slavery in their supply chains.

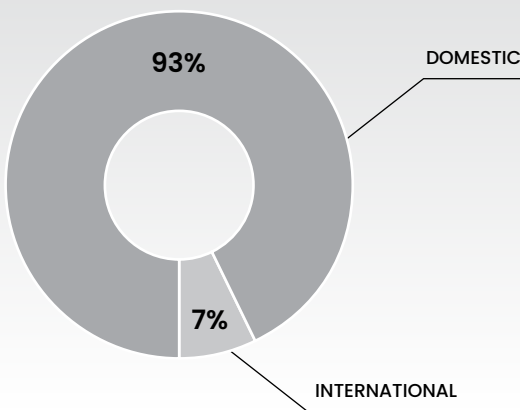
We acknowledge that our supply chains are global and, in cases involving multi-tier suppliers, inherently complex. As such, we prioritise the analysis and monitoring of key expenditure categories to minimise risk and continually strengthen our due diligence processes.

Supplier engagements are monitored in accordance with the University's obligations under the *Modern Slavery Act 2018* (Cth). The University Procurement Framework consists of policies and procedures adhering to the requirements of the *Queensland Procurement Policy* (QPP). While considering the traditional aspects of procurement in value for money, integrity, probity and accountability, the framework reflects the expectations of advancement of economic, environmental and social objectives, particularly for Queensland communities.

In 2025, the University goods and services spend was over \$85 million with suppliers worldwide:

- 93 percent (\$79.4 million) with first-tier domestic suppliers
- 7 percent (\$5.7 million) with first-tier international suppliers.

Domestic vs international spend 2025



3 Modern slavery risk

In accordance with the Act, the University has considered the potential to cause, contribute to, or be directly linked to modern slavery. Given that the University's operations are largely undertaken in Australia, a country rated by the Global Slavery Index as low in prevalence of and vulnerability to modern slavery practices, it considers itself low risk in this respect. However, the University recognises the potential risk of being directly linked to modern slavery practices through its business relationships and the possible increased risk from downstream supply chains.

University approach

The University's approach to implementing the Modern Slavery Act is based around a three-stage process: identify, address and maintain.

IDENTIFY

- Understand modern slavery risk as a whole
- Sector collaboration and similar networks
- Identify high risk industries and geographical locations
- Identify areas within the University to be reviewed



ADDRESS

- Review policies, procedures, tender process
- Preventative contract clauses
- Review supplier base and onboarding process
- Analyse data available in modern slavery tools and address risk areas as required
- Increase staff knowledge of potential risks



MAINTAIN

- Continue, maintain, and adapt from previous stages to address the future approach
- Develop ongoing initiatives
- Continue to collaborate with industry networks and utilise capture and reporting dashboards
- Continuous review and improvement

Risk within operations

UniSC considers the risk of modern slavery occurring within its direct operations to be low. This assessment is based on the robust legislative and regulatory frameworks that govern the University's operations, as well as the internal safeguards embedded across policies, agreements, and institutional practices.

These frameworks and safeguards promote ethical conduct, fair treatment, safe working conditions, and protection for vulnerable individuals — key elements in preventing modern slavery. While approximately seven percent of UniSC's supply chain spend is associated with international suppliers, the majority is domestic and assessed as low risk. The University's commitment to these principles is reflected in the following governing documents, listed in order of relevance to addressing modern slavery risks:

- ☑ **Working with vulnerable people (including Child Protection) – Governing Policy**
- ☑ **Anti-discrimination and Freedom from Bullying and Harassment Staff – Operational Policy**
- ☑ **Equity, Diversity and Inclusion – Operational Policy**
- ☑ **Staff Code of Conduct – Governing Policy**
- ☑ **Health, Safety and Wellbeing – Governing Policy**
- ☑ **Student Complaints Resolution – Academic Policy**
- ☑ **Student Conduct – Governing Policy**
- ☑ **Enterprise Agreement 2023**

Together, these policies reinforce a culture of integrity and accountability, and articulate clear principles for preventing, identifying, and responding to risks of modern slavery. UniSC remains committed to upholding human rights and continually strengthening its approach to ethical and responsible operations.

AUPN modern slavery program

The Australasian Universities Procurement Network (AUPN) runs a sector wide modern slavery program involving 41 universities across Australia and New Zealand. The program uses collective purchasing power and shared expertise to strengthen ethical procurement and meet obligations under the *Modern Slavery Act 2018* (Cth).

2025 Program Pillars and Initiatives

In 2025, the AUPN MS program operates under five program pillars.

1. Risk data

Universities assessed over 180,000 suppliers (worth \$14 billion in spend) to map high risk categories such as medical equipment, ICT, and international student recruitment. This data supports targeted interventions and compliance activities.

2. Capability uplift

The sector expanded training through forums, newsletters, case studies, and Australian Catholic Religious Against Trafficking in Humans (ACRATH) Educating for Change micro credentials. By the end of 2025, 32 universities had adopted the six-module online program.

3. Supplier engagement

Further reviews were carried out with five high risk suppliers in medical and laboratory consumables. A deeper review of the medical gloves sector is underway, due for completion in 2026.

In ICT, 22 universities joined an Electronics Watch pilot monitoring factories in seven countries, identifying issues such as wages, safety, discrimination, excessive hours, and forced labour. Remediation is in progress in 13 cases.

4. Industry collaboration

Universities collaborated through initiatives such as the Temporary Migrant Survey (with 18 universities contributing over 150 responses) and the International Student Risk Roundtable. Insights are informing sector wide guidance to be delivered in 2026.

5. Third party support

Partnerships with groups like ACRATH and Electronics Watch provide training, independent monitoring, and specialist expertise to strengthen university responses to modern slavery risks.

The program continues to build capability, deepen supplier engagement, enhance risk assessment, and develop student related guidance.

For more information, visit

hes.edu.au/university-anti-slavery-program

Our modern slavery risks by country

UniSC’s supplier base is predominantly domestic and low risk, with only around seven percent of total procurement spend directed to international suppliers. Of this, less than one percent of total spend is associated with countries rated as high or very high risk for modern slavery.

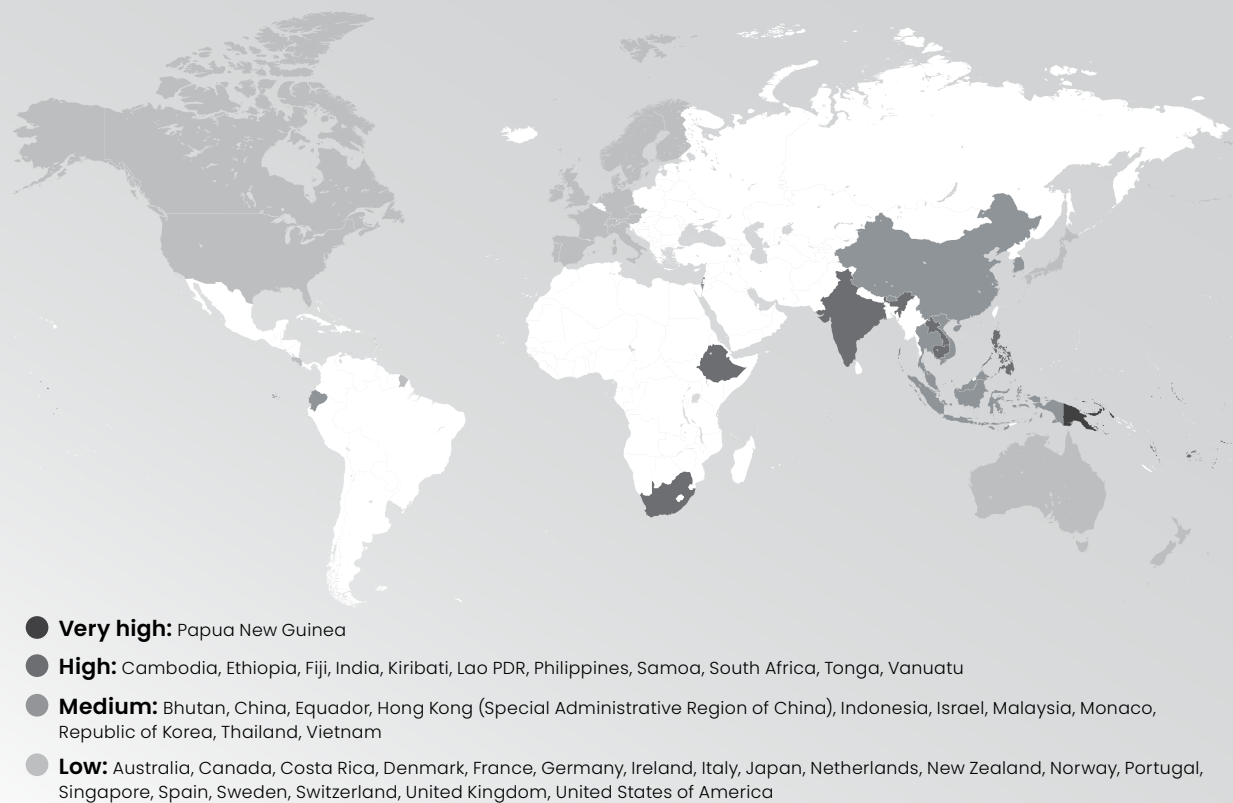
To monitor and assess potential exposure the AUPN has engaged with the ArcBlue (part of Bain & Company) modern slavery dashboard.

The assessment is based on three key factors: geography, sector and commodity and is determined using source data from:

- Global Slavery Index (GSI)
- Responsible and Ethical Private Sector Coalition against Trafficking (RESPECT)
- Australian Catholic Anti-Slavery Network (ACAN).

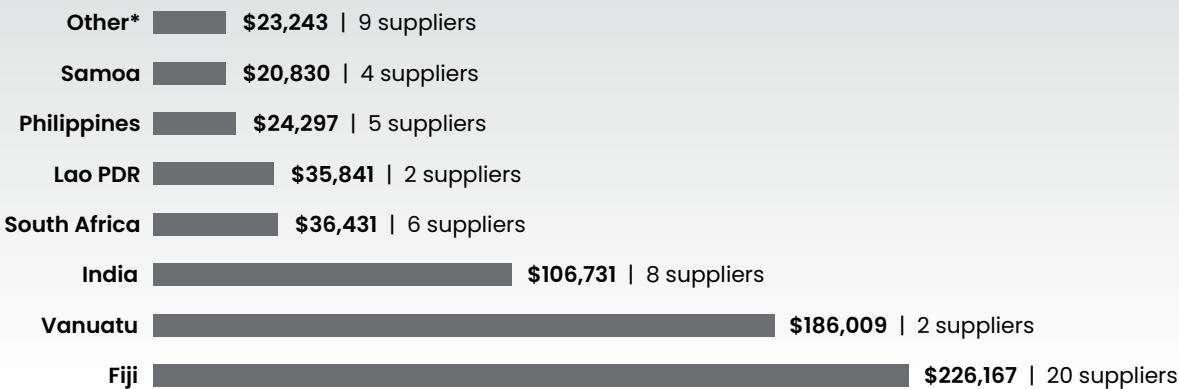
The map below outlines the University’s suppliers in 2025 by country in relation to the prevalence of modern slavery risk as per the ArcBlue dashboard.

Geographical spread of suppliers and inherent risk levels



In 2025, the dashboard’s insights revealed that the university’s procured with 56 suppliers from countries which are inherently high-risk for modern slavery, equating to a spend just under \$660,000.

2025 High risk country spend and supplier numbers



* Includes Tonga, Papua New Guinea, Ethiopia, Cambodia and Kiribati.

Further details of the predominant spend area for the high and very high-risk countries are in the table below.

Breakdown of high-risk country spend areas

High/very high-risk countries	No. of suppliers	Predominant spend areas
Fiji	20	• Agency contractors and temporary workers • Agricultural supplies and services • Catering, banquet and food services • Clinical trial services • Commissions and honorariums • Educational partnerships • Meals, entertainment and incidentals • Research collaborations • Student counselling • Subject matter specialist (business) • Travel management fees • Travel passes
India	8	• Agency contractors and temporary workers • Clinical trial services • Commissions and honorariums • Meals, entertainment and incidentals • Research collaborations • Student placements
South Africa	6	• Animals, dead or alive • Graduation managed services • Meals, entertainment and incidentals • Research collaborations • Travel passes
Philippines	5	• Auditing services • Clinical trial services • Entertainers and non academic speakers • Media and advertising • Research collaborations
Samoa	4	• Accommodation • Meals, entertainment and incidentals • Scholarships • Travel passes
Tonga	3	• Agency contractors and temporary workers
Lao PDR	2	• Agency contractors and temporary workers • Clinical trial services
Papua New Guinea	2	• Clinical trial services • Energy and environment
Cambodia	2	• Awards and gifts • Project and program management (including change management)
Vanuatu	2	• Clinical trial services
Kiribati	1	• Meals, entertainment and incidentals
Ethiopia	1	• Agency contractors and temporary workers

Our modern slavery risks by category

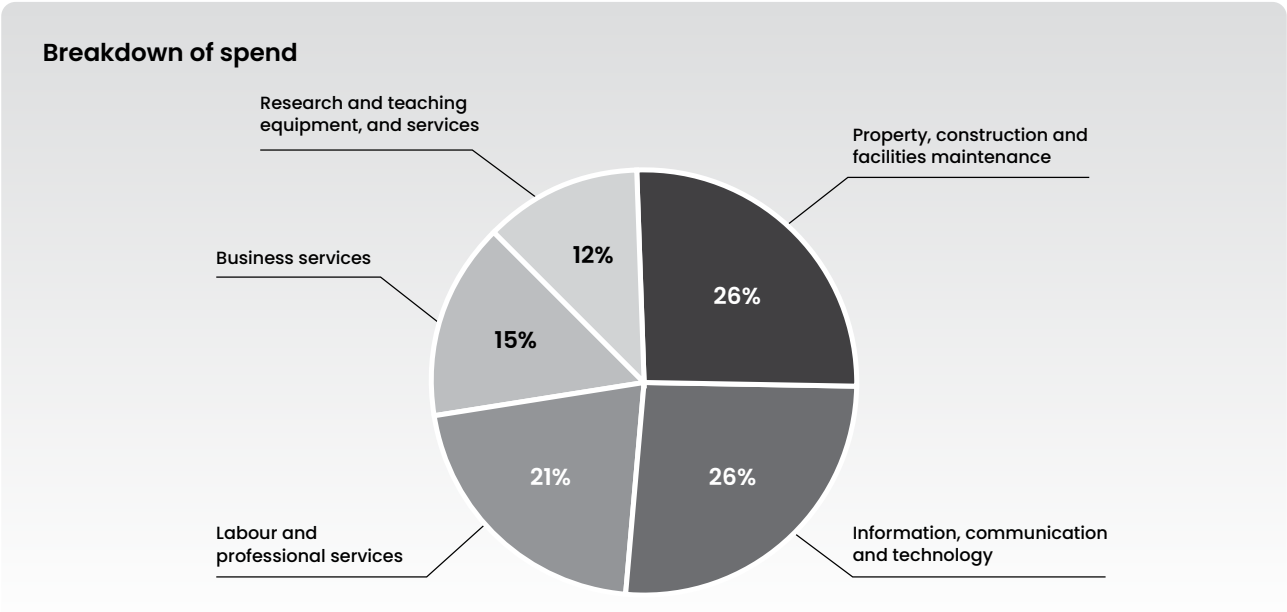
Based on the taxonomy of the AUPN, our procurement spend can be grouped into five broad categories:

- **Property and facilities (around 26 percent)** – eg building construction and maintenance, campus services, utilities and energy.
- **Technology (around 26 percent)** – eg IT hardware and software, telecommunications services.
- **Labour and professional services (around 21 percent)** – eg recruitment, contracted services and training.
- **Business services (around 15 percent)** – eg professional consulting services, human resources and staffing services, marketing, travel and accommodation.
- **Research and teaching (around 12 percent)** – eg laboratory equipment and research supplies, library resources, academic conferencing and related expenses.

Each of these areas has different risk profiles. We recognise that some categories (such as IT hardware or certain facilities services) inherently carry higher modern slavery risks due to the nature of those industries and their supply chains.

In summary, UniSC’s structure and operations are those of a growing, regionally rooted university with an increasing global reach, and our supply chains are diverse and largely low-risk by spend distribution. However, we do not assume low risk equates to no risk – especially deeper in our supply chain – and as a result we have established a proactive framework to identify and manage modern slavery risks wherever they may arise.

The University’s spend can be split into five key areas. See the following breakdown in the diagram below.



Property, construction and facilities maintenance 26%	Information, communication and technology 26%	Labour and professional services 21%	Business services 15%	Research and teaching equipment, and services 12%
• Energy and utilities • Facilities maintenance • Infrastructure • Property management • Security equipment and services	• IT hardware • IT services • IT software • Telecommunications	• Contracted services/advice • Recruitment • Training and development	• Corporate services • Logistics and storage • Marketing and events • Stationery, office supplies and clothing • Travel and fleet	• Collaborations • Education services • Laboratories and research • Lecturer and teaching expenses • Library services • Student services

4 Actions to assess and address modern slavery risks

As part of this continued annual reporting, the University remains committed to improving how it identifies, assesses and addresses modern slavery risks across its supply chains, and to strengthening transparency, accountability and responsibility for the people working within them. Many of the actions undertaken in 2025 build on commitments identified in the prior reporting period, with a particular focus on progressing and embedding those commitments through the University's broader procurement maturity uplift and responsible procurement agenda. During 2025, UniSC continued to mature its approach to modern slavery risk management through the strengthening of Strategic Procurement and the broader procurement and contract management frameworks. This included capability uplift, policy and process reform, stronger procurement and contract controls, improved risk visibility, and continued sector collaboration through the AUPN Modern Slavery Program. This reflects a shift from establishing baseline settings toward more deliberate implementation and integration across procurement, contracting and supplier engagement practice.

The University strengthened modern slavery awareness and capability in 2025 through the rollout of ACRATH's Educating for Change program, an awareness-raising initiative designed for university staff and students. All Procurement and Finance staff completed the training, and discipline-specific modules were made available to students through the University's learning management system (LMS). The program is intended to support university staff in addressing modern slavery in their current roles, while also equipping future professionals with the skills to identify and respond to modern slavery in their fields. The training remains accessible to both staff and students, supporting ongoing awareness and capability uplift across the University community. The University is focused on ensuring appropriate actions are taken to alleviate risk of modern slavery in its supply chain.

The key actions undertaken to date are outlined in the following table.

Task	Achievements
Education and awareness	- Continued to strengthen capability through targeted modern slavery education, including ACRATH's Educating for Change short courses for key buyers and our students in 2025. - This was supported by broader awareness materials and training made available to staff and students through the University's LMS platforms, helping build understanding of modern slavery risks and the role individuals can play in identifying and responding to them. ACRATH publicly frames Educating for Change as short courses designed to combat modern slavery.
Strategic procurement maturity program	- Continued implementation of the University's Strategic Procurement Maturity Program to strengthen procurement capability, governance and institutional oversight. - This program is supporting a more structured and mature approach to responsible sourcing, supplier engagement and contract management across the University. - Modern slavery considerations were further embedded through procurement policies, procedures and tender documentation as part of this broader uplift.
University section-wide response	- Continued active participation in the sector-wide response to modern slavery through the AUPN (Australian Universities Procurement Network). - Continued use of the ArcBlue dashboard to support visibility of inherent modern slavery risk across the supply chain and assist with reporting requirements. - Continued participation in the AUPN Anti-slavery Working Group, which has supported the development and ongoing progression of the sector-wide Anti-slavery Program. Strategic Procurement attends the Working Group as part of this ongoing program of work. - Participated in the AUPN Electronics Watch pilot and related sector-led activity to support collaboration and shared learning on ICT supply chain risk. - Monitored alerts against relevant reportable supply chain activity to determine whether any University intervention or follow-up was required.

Task	Achievements
High-risk category sourcing and contract controls	• The procurement strategy and tender documentation for the University's cleaning and waste services procurement were intentionally structured to strengthen transparency and labour-related assurance in a higher-risk service category. • This included requirements for transparent commercial pricing and supporting reporting mechanisms, such as invoice and payslip audits, to demonstrate compliance with award obligations and statutory payment requirements. These measures provide greater confidence during evaluation and contract management that workers are being paid appropriately, including in line with applicable awards and statutory entitlements. • These measures were designed to support more informed due diligence and reduce the risk of procurement settings inadvertently encouraging labour practices inconsistent with the University's expectations and modern slavery obligations. • Undertook a targeted review of international agent agreements to ensure appropriate contractual provisions relating to modern slavery were in place.
Risk management	• Leveraged industry tools, including annual supplier data imported into the ArcBlue dashboard, to support risk analysis across the supplier chain. • Monitored, managed and responded to impacts relevant to the modern slavery risk environment through the ArcBlue dashboard.

5 Evaluating effectiveness

The University assesses the effectiveness of its modern slavery response through a combination of internal capability uplift, procurement and contract management reform, supplier engagement, and sector-informed risk monitoring. In 2025, this approach continued to mature, with modern slavery considerations becoming more consistently embedded into broader procurement practice rather than being treated as a standalone compliance activity.

A key indicator of effectiveness has been the strengthening of procurement capability and governance through the University's broader Strategic Procurement Maturity Program. This has supported a more structured approach to responsible sourcing, supplier oversight, and risk-based decision-making, and will increasingly support a stronger institutional foundation for identifying and responding to modern slavery risk over time.

The University has also observed improving supplier awareness and responsiveness through procurement processes. Earlier in its reporting journey, supplier responses, particularly from non-reporting entities, were often limited in depth. During 2025, supplier responses increasingly reflected greater familiarity with modern slavery expectations and more developed engagement with related due diligence questions. This indicates a maturing market response and a stronger basis for supplier dialogue and assessment.

The University's continued participation in the AUPN Anti-slavery Working Group has also remained an important source of sector collaboration, benchmarking and shared learning. Sector initiatives, including the ArcBlue dashboard, supplier assessment approaches, grievance mechanisms and remediation guidance, have helped support more consistent practice across the higher education sector and strengthened UniSC's ability to assess and respond to supply chain risk in a more informed and proportionate way.

As part of this sector-wide approach, the University has continued to have regard to monitoring insights arising through the AUPN affiliation with Electronics Watch. These insights have contributed to broader visibility of labour rights and modern slavery risks in ICT supply chains and have helped inform UniSC's understanding of higher-risk category settings, including where further review or supplier engagement may be appropriate.

Internal awareness and capability have also been strengthened through targeted education. During 2025, the University rolled out ACRATH's Educating for Change training, with all Procurement and Finance staff completing the training, alongside discipline-specific modules made available to students through the University's learning platforms. This has strengthened awareness of modern slavery risks, supported clearer understanding of procurement and decision-making responsibilities, and contributed to a more informed institutional response.

The University continues to assess effectiveness through a range of practical indicators, including:

- **Capability uplift:** whether relevant staff are better equipped to identify, escalate and respond to modern slavery risks
- **Supplier engagement:** whether suppliers demonstrate stronger awareness, transparency and responsiveness through sourcing and due diligence processes
- **Risk visibility:** whether tools such as the ArcBlue dashboard and sector alerts provide better visibility of higher-risk suppliers, categories and issues
- **Framework embedding:** whether modern slavery considerations are being more consistently reflected in procurement policies, procedures, tender documentation and contractual controls
- **Sector collaboration:** whether participation in shared sector initiatives continues to strengthen UniSC's approach and support more consistent practice.

Taken together, these measures indicate continued progress in the University's approach to modern slavery risk management during 2025. While this remains a developing area of institutional maturity, the University's systems, capability and governance settings are becoming more structured, more informed, and better placed to support ongoing improvement over time.

6 Consultation with controlling entities

The University reviewed the structure and status of USC Capital & Commercial Pty Ltd, its sole wholly owned subsidiary, as part of preparing this Statement. The subsidiary was non trading during the reporting period and was deregistered in November 2025. As it held no revenue or assets and is not required to report under the Modern Slavery Act 2018 (Cth), its ownership is immaterial to this Statement.

7 Other information

As the University moves into the next reporting period, we remain committed to strengthening and refining our approach to addressing modern slavery. In 2026, a key priority will be the continued rollout of modern slavery training for staff and students, ensuring that awareness of risks and responsibilities is embedded across the University community. Alongside this uplift in capability, we will continue to enhance our spend data analysis to support more effective identification and assessment of modern slavery risks within our operations and supply chains.

This Statement was approved by the University of the Sunshine Coast Council on 17 June 2026.



Professor Helen Bartlett
Vice Chancellor and President
University of the Sunshine Coast

