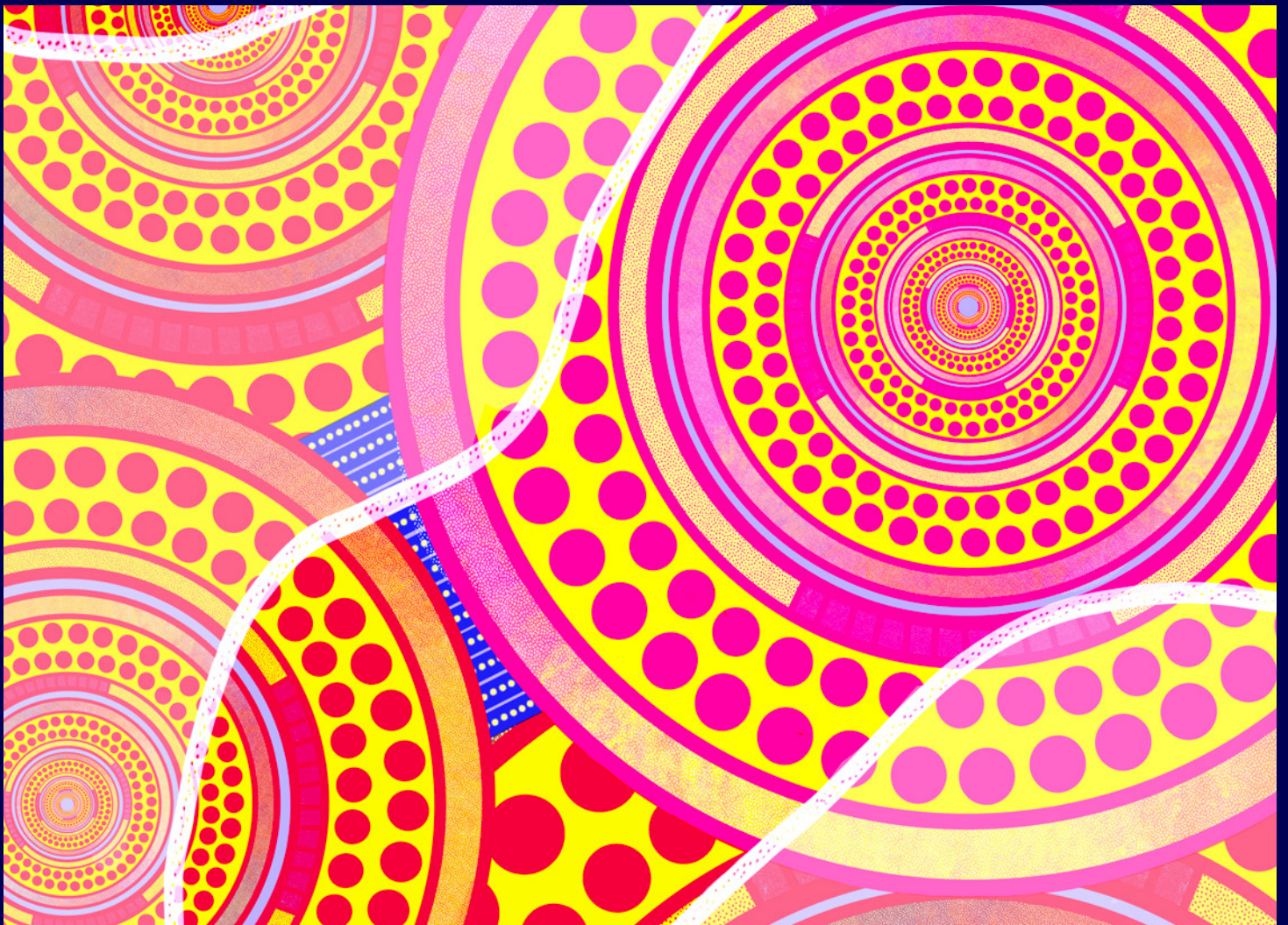# Modern Slavery Statement

2021

Introduction

The Royal Melbourne Institute of Technology (RMIT) recognises modern slavery risk as a complex global human rights issue, and we continue to further our actions in pursuing the elimination of modern slavery across our operations and supply chains.

In responding to our reporting obligations under the Modern Slavery Act 2018 (Cth) (the Act), this statement describes:

- The RMIT structure, operations and supply chains

- Our consultation processes with controlled entities

- Potential risks of modern slavery risks across our operations and supply chains

- Actions taken to assess and address risks of modern slavery across our operations and supply chains

- How we assess the effectiveness of our actions

- Our consultation processes with the controlled entities

The reporting entity for this statement, RMIT, trading as RMIT University, comprises the owned and controlled entities: RMIT Holdings Pty Ltd, RMIT University Vietnam LLC, RMIT Spain S.L., RMIT Training Pty Ltd, and RMIT Online Pty Ltd. These entities are primarily based in Australia, Spain, and Vietnam, and consist of all RMIT's owned and controlled entities under the Act.

In 2021, we have continued to build upon the progress outlined in our previous statement. Our focus for the year has been on enhancing our core capabilities for the identification of, and response to, modern slavery risks. This primarily comprised improvements in governance and risk oversight, greater integration into our risk and audit programs, and enhancements in procurement systems.

We understand that effective action towards the eradication of modern slavery requires sustained and long-term effort. Whilst we have made initial progress in improving the maturity of our practices, focused and strategic attention is needed to continue to enhance our approach in the years to come.

Compliant with the requirements, the RMIT Modern Slavery Statement for the 2021 calendar year is endorsed by the RMIT Council and signed by the Vice-Chancellor and President.

The Modern Slavery Act

The Modern Slavery Act 2018 (the Act) has established Australia's national modern slavery reporting requirement.

'Modern slavery' describes situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom. The Act defines modern slavery as including eight types of serious exploitation: trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for abour or services,and the worst forms of child labour.

It is important to emphasise that modern slavery is only used to describe serious exploitation that involves the loss of freedom. Modern slavery does not include practices like substandard working conditions or underpayment of workers. However, these practices are also illegal, harmful, and may be present in some situations of modern slavery.

Our approach to addressing Modern Slavery

At RMIT we are committed to identifying and addressing modern slavery risk across our own operations and contributing to global efforts where its presence may be obscured in supply chains. We are a values-led University, focused on making a positive contribution within the local and global communities where we operate, so this is fundamental.

At RMIT we are committed to identifying and addressing modern slavery risk across our own operations and contributing to global efforts where its presence may be obscured in supply chains. We are a values-led University, focused on making a positive contribution within the local and global communities where we operate, so this is fundamental.

We take modern slavery risk seriously and acknowledge our responsibility to play our part toward its long term eradication. As a global tertiary education institution, we also have a unique opportunity to make a difference through our research and innovation capabilities. As a result, it is incumbent on us to use our expertise and influence to educate and inform on human rights issues across business more broadly.

The Business and Human Rights Centre (BHRIGHT), located in RMIT's College of Business and Law, addresses the human rights impact of business through research, education, innovation and collaboration. BHRIGHT is the first centre for business and human rights in Australia, running masterclasses, consultancies and design labs to generate and share innovation and train current and future leaders to develop and integrate human rights standards in their respective industry contexts.

BHRIGHT proactively participates in law reform and public policy debates and conducts empirical studies to build evidence of human rights and business impact. This amplifies the voices of affected communities and workers through a range of conceptual frameworks and methods to develop solutions for a future that is fairer, more equitable and sustainable.

RMIT is in the early stages of our modern slavery journey. Since our first statement, we have worked to strengthen engagement and collaboration with our suppliers and develop processes to improve the transparency of risks. We are signatories to the UN Global Compact and members of the UN Global Compact Network Australia and Supply Chain Sustainability School, reflecting our strong track record on sustainability that is supported by practical partnerships with industry and community.

Looking ahead, we will remain vigilant in our commitment and informed on emerging developments in modern slavery risk and human rights issues. At RMIT we see education as a path to choice and opportunity in a world where this kind of abuse has no place.

Professor Alec Cameron
Vice-Chancellor and President

1. About RMIT

RMIT is a multi-sector university of technology, design and enterprise, with 96,277 students and close to 10,000 staff globally.

The University's mission is to help shape the world through research, innovation and engagement, and to create transformative experiences for students to prepare them for life and work. Postgraduate, undergraduate, vocational education, foundation studies and online programs offer students a variety of work-relevant pathways.

RMIT's three campuses in Melbourne – Melbourne City, Brunswick and Bundoora – are located on the unceded lands of the people of the Woi Wurrung and Boon Wurrung language groups of the Eastern Kulin Nation.

As a global university, RMIT has two campuses and a language centre in Vietnam as well as a research and industry collaboration centre in Barcelona, Spain. Programs are also offered through partners in locations including Singapore, Hong Kong, Sri Lanka and mainland China, with research and industry partnerships on every continent.
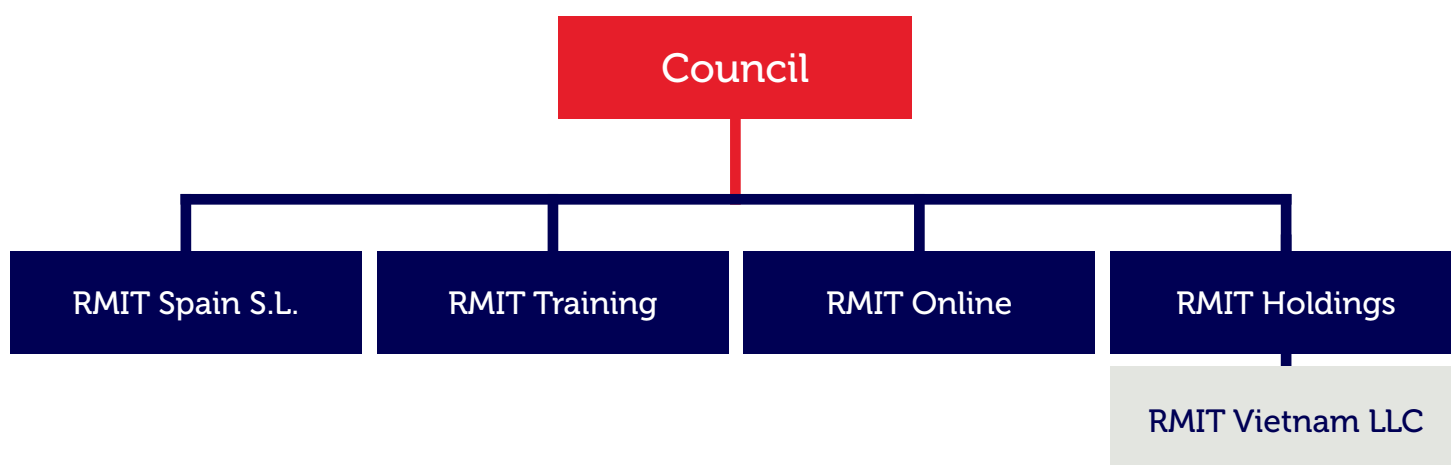
We are driven to serve the communities who rely on us, and no time in our history has been more filled with challenge and change than right now. Our values are central to our ability to respond to this challenge and guide our modern slavery response.

Controlled Entities

RMIT, trading as RMIT University (ABN 49 781 030 034), is the reporting entity for this statement.
This entity comprises the following owned and controlled entities, which have been included in this statement:

Entity	Identifier	Description
RMIT Holdings Pty Ltd	ABN 74 096 911 312	A wholly owned entity of RMIT that supports research aiming to help solve critical global problems and to deliver significant economic, social and environmental impact.
RMIT Training Pty Ltd	ABN 61 006 067 349	A wholly owned entity of RMIT that provides a range of education solutions to students, academics and professionals located in Melbourne and overseas
RMIT Online Pty Ltd	ABN 38 614 454 170	A wholly owned entity of RMIT. Its purpose is to advance education and life-long learning through online modern technology and pedagogy and to provide digital learning experiences
RMIT Spain S.L.	CIF B65886012	A wholly owned entity of RMIT. Its purpose is to promote our global teaching and research activities in Europe and serves as a gateway for the University to European research, industry, government and enterprise
RMIT University Vietnam LLC	MSDN 0302169193	A wholly owned entity of RMIT Holding Pty Ltd. The University's Asian Hub operates across three locations in Hanoi, Ho Chi Minh City and Da Nang

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│ S.L.         │ │ Training     │ │              │ │ Holdings     │
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                                                    │ RMIT         │
                                                    │ Vietnam LLC  │
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These entities were consulted in the development of this statement, making enquiries with relevant business areas to gain an understanding of modern slavery risks in their respective operations and supply chains. For the 2021 reporting cycle, we focused on improving our understanding of modern slavery risks in the operations of RMIT Vietnam and RMIT Spain. RMIT Online and RMIT Training operate within the core structures of our Australian processes and systems.

As we move forward, our controlled entities will continue to actively participate in our Modern Slavery Statement Working Group.

Governance

RMIT University was established and is governed in accordance with the Royal Melbourne Institute of Technology Act 2010 (Vic). The responsible Minister is the Hon. Gayle Tierney MP, Minister for Training and Skills and Minister for Higher Education.

RMIT Council

Consistent with the Act, the RMIT Council is the University's highest governing body and has responsibility for the general direction and superintendence of the institution.

One of the primary responsibilities of the Council is to oversee and monitor the assessment and management of risk across our organisation, including university commercial activities. The Council continues to provide accountability and oversight for our modern slavery risk management approach, bearing responsibility for the review and endorsement of this statement.

In 2021, the RMIT Council consisted of:

- The Chancellor
- The Vice-Chancellor
- The Chair of the Academic Board
- Three persons appointed by the Governor in Council
- One person appointed by the Minister
- Four persons appointed by the Council
- One person elected by students
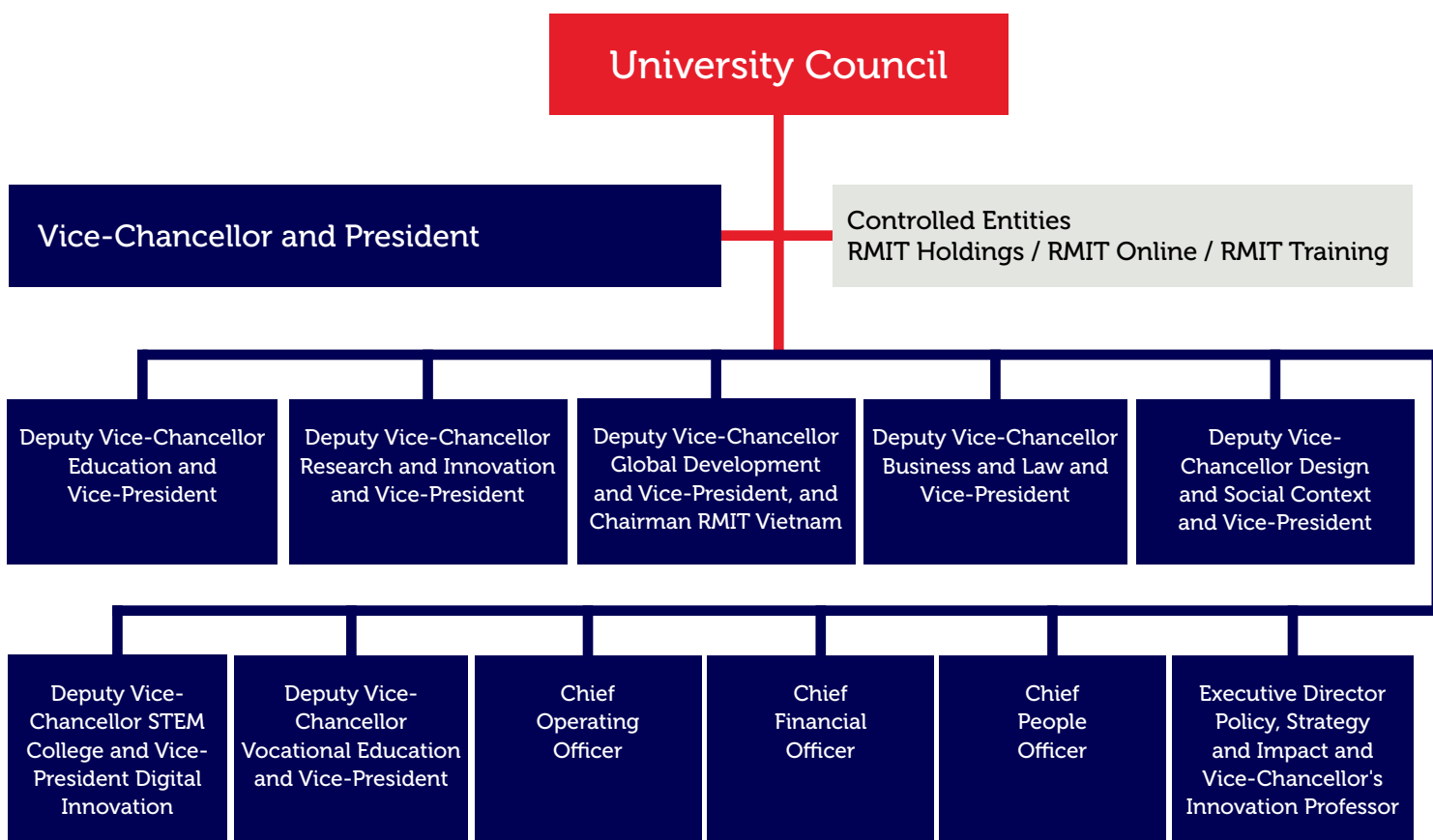- One person elected by staff.

Council members participate in the approval of the University's strategic direction, annual budget and Annual Operating Plan, and in monitoring the University's performance. The Council appoints the Vice-Chancellor and President.

The Audit and Risk Management Committee (ARMC) of Council maintains responsibility for oversight of modern slavery risk management practices, assisting the Council to fulfil its responsibilities in relation to the university's external and internal audit functions, risk management framework, and compliance framework.

In 2021, the ARMC continued to receive regular updates on our modern slavery practices throughout the year.

University Structure

Led by our Vice-Chancellor and senior executives, our structure is comprised of several operational portfolios, as well as academic colleges and schools.

University Council

Vice-Chancellor and President

Controlled Entities
RMIT Holdings / RMIT Online / RMIT Training

Deputy Vice-Chancellor Education and Vice-President	Deputy Vice-Chancellor Research and Innovation and Vice-President	Deputy Vice-Chancellor Global Development and Vice-President, and Chairman RMIT Vietnam	Deputy Vice-Chancellor Business and Law and Vice-President	Deputy Vice-Chancellor Design and Social Context and Vice-President

Deputy Vice-Chancellor STEM College and Vice-President Digital Innovation	Deputy Vice-Chancellor Vocational Education and Vice-President	Chief Operating Officer	Chief Financial Officer	Chief People Officer	Executive Director Policy, Strategy and Impact and Vice-Chancellor's Innovation Professor

For more information on the RMIT Governance Structure, see the 2021 Annual Report.

Risk management

The risk of modern slavery in our operations and supply chains has been identified within the organisation's enterprise risk management approach, and this risk was elevated as part of our annual risk review process in 2021. During the year, our Key University Risks (KURs) were reviewed and updated to include two risks relating to modern slavery:

- KUR 2 – Regulation and Compliance
- KUR 9 – Environmental and Social Sustainability

The elevation of modern slavery risk within these two risks reflects the prominence of this issue and highlights its importance. The updated Key University Risks were endorsed by the Vice-Chancellor's Executive in December 2021.

Modern Slavery Working Group

A Modern Slavery Working Group was formed in 2020 to lead the research and discovery process and formulation of our inaugural statement. In 2021, RMIT prioritised resilience in the face of significant disruptions from COVID, working tirelessly to support our students, keep our community safe and ensure that our culture of care extended to all.

As on-campus activity in Australia and Vietnam was reduced due to lockdowns, the focus shifted to improving internal processes and reflecting on the actions outlined in our previous statement.

The Modern Slavery Working Group has now been formally adopted as a sub-group of the RMIT Sustainability Committee. The Sustainability Committee has the responsibility and oversight for the coordination of sustainability initiatives across all areas of the University. Its goal is to ensure sustainability principles and practices are embedded within the University's core teaching and learning, research, governance and operational activities.

The Sustainability Committee reports through the Chair (the Chief Operating Officer) to the Vice Chancellor's Executive on the University's sustainability performance and makes recommendations about sustainability-related commitments, policies, planning and partnerships.

It is also responsible for oversight of the University's commitment to the UN Sustainable Development Goals.

The Modern Slavery Working Group is required to:

1. Provide guidance and input into RMIT's annual Modern Slavery statements.

2. Monitor and report on compliance obligations under the Modern Slavery Act (2018) to the RMIT governance bodies, as required.

3. Bring together the key stakeholders from across RMIT, including the controlled entities, to drive continuous improvement in the University's response to addressing modern slavery.

The Working Group will support the ongoing development of a framework of governance, systems and processes to ensure compliance obligations are met under the Act and focus on continuous improvements.

Our policies

Our approach is guided by a university-wide policy framework that outlines our requirements and expectations for managing modern slavery risk areas across our operations and supply chain.

Where stated below, these policies embed consideration of modern slavery risk. We have identified an opportunity to review and align some of these policies to clearly articulate our stance and approach towards modern slavery risk, namely our Code of Conduct, Risk Management Policy, Compliance Policy, and Complaints Governance Policy. We commit to the review of these policies as they expire in the coming years.

Policy	Description
Code of Conduct	Provides guidance and defines the enforceable standards for our ways of working, ways of knowing and ways of being. Outlines how we work together as a community of professionals, academics, education practitioners and researchers, setting the standard for ethical behaviour, and guiding our culture and attitude towards the elimination of modern slavery.
Sustainability Policy	Expresses the University's commitment to advancing its sustainability ambitions as an organisation that models institution-wide excellence. Explicitly requiring the University to assess and address the risks of modern slavery in our operations and supply chains through due diligence and remediation processes, as well as implement tools to assess the effectiveness of these actions.
Risk Management Policy	Sets out the key principles and expectations to support the effective management of risks to our activities, objectives and strategy, and promotes transparency and integrity in our decision making.
Compliance Policy	Defines our framework and objectives for the management of compliance obligations and promotes a positive compliance culture as an integral part of ensuring good governance and operational excellence.
Corporate Social Responsibility Framework	Provides a screening methodology to identify individuals, businesses, or organisations that have the potential to create an ethical or reputation risk to the university so that we can implement appropriate risk mitigation and ensure Corporate Social Responsibility (CSR) obligations are met as a signatory to the UN Global Compact. This includes specific consideration of human rights issues (including modern slavery), labour practices, corruption, and environmental concerns.
Supplier Code of Conduct	Describes our minimum requirements regarding the conduct of our suppliers of goods and services in the areas of labour and human rights, protection against modern slavery, environmental management, health and safety, corporate governance, and ethical business practices.
Complaints Governance Policy	Sets out the principles and governance framework that inform our approach to complaint handling.
Diversity, Inclusion and Equal Opportunity Policy	Sets out our commitments to ensure that all staff members and students are educated to recognise and prevent institutional or systemic issues that lead to discriminatory practices and/or behaviours that may constitute discrimination.

2. Our Progress

We are at the initial stages of modern slavery awareness and maturity, having continued to build our core foundational capabilities for the identification of, and response to, modern slavery risks.

Our understanding of modern slavery risk areas considers a number of factors and assesses inputs from a range of sources. Our approach is informed by external specialists, the Global Slavery Index 2018, government advice, and ongoing news and developments on modern slavery risks and issues both globally and in Australia.

Our key areas of risk as relating to modern slavery remain:

- Staff
- Students
- Supply chains
- Philanthropic investments

Our most recent modern slavery risk assessment over our operations and supply chain was performed in developing our 2020 statement and has been carried forward to the current year.

The modern slavery risk profile of our operations and supply chain was deemed to be comparable to our previous risk assessment.

In reviewing our focus areas for 2021, as found within our previous statement, we recognise that we have made progress in vendor engagement and capability, supplier due diligence, supply chain mapping, and data and indicators of effectiveness. In the 2021 calendar year, we made progress in three key areas as outlined below.

Area	Improvements
Continuing improved risk governance	In 2021, the RMIT Audit and Risk Management Committee (ARMC) provided greater oversight and visibility of modern slavery risk, increasing its mandate, and continued to acknowledge areas where this risk may be present, for example, supply chain, supplier registration, contracts landscape, tender processes. During the year, our Key University Risks (KURs) were reviewed and updated to include two risks relating to modern slavery: ■ KUR 2 – Regulation and Compliance ■ KUR 9 – Environmental and Social Sustainability
Greater integration into our risk and audit programs	**Enterprise risk management** – within our enterprise risk management framework, the risk of modern slavery was re-assessed during the annual review and update of our risk profile, and now receives greater oversight as a Key University Risk, the highest level within our risk framework. **Future internal audit programs** – in late 2021, we prepared for a review of our updated procurement practices, including treatment of modern slavery risk, which will be performed by our Internal Audit function in early 2022.
Enhanced supplier data and systems	In June 2021, RMIT implemented Workday as its Enterprise Resource Planning System. It has enabled greater analysis and reporting of supplier activity, including information on location, spend and number of suppliers by category. The system and associated processes cover all RMIT entities, which aids transparency and consistency of approach. The supplier registration process built into the system also enhances tracking of supplier compliance with university policies, such as whether new and renewing suppliers have acknowledged the RMIT Supplier Code of Conduct through the Workday supplier portal.

Further information on these improvements can be found in Section 6 of this statement. In some areas, such as awareness raising and deepening risk understanding, we have made initial progress in relevant business areas such as our procurement function but recognise that more work is needed.

Our areas for future attention and action have been outlined at the end of this statement. To continue to address these areas, we will work with an external specialist to develop a staged maturity model in 2022. This model will inform our prioritised and practical strategies to improve the maturity of our modern slavery program over the short, medium, and long term.

In addition to describing our key improvements, this statement provides further detail on our operations and supply chains, and the modern slavery risks in these areas. This statement provides greater insight into our workforce in Vietnam and Spain, the higher risk areas of our supply chain, and our investments. This information can be found in Sections 3-5 of this statement.

The 2021 statement describes the actions taken to respond to modern slavery risk, including both governance arrangements and policies and procedures, as well as the actions taken to address specific types and forms of modern slavery risk identified.

3. Our People

Staff

RMIT employs close to 10,000 staff globally, comprising a workforce of professional and academic staff based at one of our three campuses in Melbourne – Melbourne City, Brunswick and Bundoora. Approximately 4,000 of our staff are employed on a casual basis.

All Australian onshore employees are covered by Enterprise (Collective) Bargaining Agreements RMIT Vietnam's workforce of approximately 900 staff is comprised of two employee types, definite (fixed term) and indefinite (continuing), in accordance with the Vietnam Labour Code 2019.

Fixed-term and continuing are salaried staff while our casual employees are paid an hourly rate.

At RMIT Spain, our 34 employees in Spain are engaged as either permanent/ongoing, temporary/fixed term, or under an internship agreement.

All employment contracts are issued in accordance with the Spanish National Collective Agreement for Private Universities and in compliance with Spanish labour laws.

Area of risk

The inherent level of modern slavery risk within our operations for directly employed staff in Australia is deemed low, given the workplace protections in place that comply with applicable labour rights legislation. A comparable approach is taken for our staff in Vietnam and Spain.

Information on the protections in place for our workforce is described in the following section.

Improvements

- All Australian onshore employees are covered by Enterprise (Collective) Bargaining Agreements and we continue to ensure compliance with our obligations under relevant labour rights legislation, such as the Fair Work Act 2009 (Cth).

- Employment agreements for our RMIT Vietnam workforce are prepared by our human resources team and then reviewed by an independent legal advisor. All agreements comply with Vietnam labour rights legislation, including labour code, statutory insurance and tax laws. We continue to provide worker benefits that exceed legislative requirements under the Vietnam Labour Code 2019.

- RMIT Spain's employment contracts are prepared by a third-party provider, and all current contracts have been prepared in accordance with the Spanish National Collective Agreement for Private Universities and are compliant with Spanish labour laws. Due to legislative changes in Spain, from January 2022 RMIT Spain will no longer issue temporary employment contracts.

Students

As of 31 December 2021, we had 96,277 enrolled students, with 10,500 students in Vietnam.

Beyond involvement in their course of study, our student population may be engaged in other activities, either as a component of their study or as volunteering. This may include involvement in Work Integrated Learning (WIL) programs, work experience, internships or volunteering. Students volunteering can be participation in one of our clubs, societies, collectives or as part of a community project or event.

Area of risk

The risk of modern slavery amongst our student population is not deemed high. However, there are risk factors arising from the activities of our student body that may give rise to substandard treatment, including their involvement in Work Integrated Learning (WIL) programs, unpaid work experience, internship arrangements and volunteering. We understand that in such situations, students may not be afforded the same protections as that provided under an employer-employee arrangement and that there is a potential for exploitation.

Improvements

To manage the risk of substandard treatment of students, we continue to maintain a number of practices:

WIL programs

- **Partner screening** – we perform a screening process for prospective WIL partners and other relevant third-party organisations. This process utilises a desktop scan to assess the appropriateness and legitimacy of potential partners, and for some of our student experience programs, a third party is used to identify partners and allocate students to these partners.

  This is an area for future improvement, to centralise oversight and formalise due diligence processes across our colleges, expand processes to include self-sourced WIL partners, and ensure coverage for WIL program students based outside Australia.

- **Partner agreements** – the WIL Partner Agreement defines the partner's responsibility for student welfare, including the provision of a safe & secure working environment.

Global Experience Programs

The Global Experience Program uses third-party agents to arrange and oversee placements. Contracts and agreements are in place to ensure that the health, safety and wellbeing of our students is paramount during their global experiences, these include:

- Education Agent Services Agreement

- Global Experience Service Provider Agreement

- Student Mobility Agreement

All students undertake a compulsory 'Preparing for Learning Abroad' training module in which they are supported to create a safety plan in preparation for an unforeseen incident while overseas. The module includes how to respond in the event of a travel or safety incident, how to maintain good health while abroad and responding to a medical emergency.

Volunteering programs and activities

- We commenced a review of existing practices and controls in late 2021, identifying the need for a number of improvements. These include the design and implementation of a volunteering governance framework, creation of position descriptions for volunteer roles, and implementation of volunteer training programs including health & safety and bystander intervention. This program will be developed and delivered in 2022.

4. Our Supply Chain

As one of Australia's largest tertiary institutions, RMIT has a significant impact through the University's operational footprint and supply chain. This allows the University to leverage its buying power to drive improved practices in the supply chain and support the strategic objective of shaping the world.

Context

Guided by the Sustainable Procurement Plan, RMIT integrates sustainability considerations into its procurement practices including processes, responsibilities and governance. The University's approach to sustainable procurement is aligned with the international standard, ISO 20400:2017 Sustainable procurement – guidance (ISO 20400). The standard defines sustainable procurement as "procurement that has the most positive environmental, social and economic impacts possible over the entire life cycle".

RMIT has a sector-specific supply chain to procure the goods and services needed to conduct our activities, which includes our entities outside of Australia.

Throughout this statement, Tier 1 in our supply chain represents the supplier with whom we have a direct relationship – we directly purchase goods and services from them. Tier 2 represents the suppliers of our Tier 1 supplier(s), Tier 3 represents the suppliers of Tier 2, and so on. We maintain formal and long-standing relationships with our contracted suppliers and undertake regular reviews of supplier relationships and contracts on an ongoing basis.

Through our Workday procurement platform, we have been able to present our total Tier 1 supplier spend for 2021, including Vietnam and Europe. This new way of reporting provides a more consistent methodology and transparency across our entities, and more granular data than was provided in our first statement.

In 2021, RMIT engaged with 3,572 distinct suppliers across all entities.

Number of Suppliers and Total Spend by RMIT Location

Entity	Number of suppliers	Total Spend AUD*
RMIT AUS	2,906	$416,174,301
RMIT VTN	599	$29,701,629
RMIT Spain	67	$512,577

*These figures include total supplier spend across CAPEX and OPEX and may be slightly different to the RMIT Annual Report due to pre-payments and accruals. RMIT Vietnam and RMIT Spain spend data is captured from June-Dec 2021, with currencies converted from VND and EUR.

RMIT Percentage of Total Spend by Region (includes all entities)

Region	Percentage
Australia	82.737%
Asia	6.662%
North America	6.160%
Europe	4.378%
Oceania (inc NZ)	0.015%
Africa	0.012%
South America	0.002%

Approximately 83% of our overall spend across all entities was paid to suppliers based in Australia. Supplier expenditure from other locations has been grouped as is practical, by region. Suppliers based in countries with a higher risk of modern slavery may be present in the regional groupings shown. We take a risk to people approach, recognising that supplier spend does not correlate to modern slavery prevalence and that the risk of modern slavery may be present even in our smallest suppliers.

Our supplier expenditure is ordered by spend categories, which are explained below:

Spend category	Description
Advertising, Marketing & Promotional Expenses	This includes our promotional, media, marketing and event management expenditure.
Consumable Materials	This includes our office consumables, printing, lab supplies and educational materials.
Contractors and Consultants	This includes those providing professional services to RMIT.
Equipment, Repairs & Maintenance	This includes all property and building maintenance, equipment and IT hardware.
Facilities Management, Lease & Rental	This includes all facilities management and leasing, including cleaning, waste removal, utilities, security services and car park management.
Finance, Tax, Insurance & Other	This includes all banking, insurance and investment management.
General & Administrative Expenses	This includes document management and storage as well as items such as memberships and subscriptions.
IT Support & Maintenance	This includes IT software licensing and managed services
Staff & Student Related Expenses	This includes OHS support, professional development and awards.
Telecommunications & Postage	This includes freight, logistics, postage, storage and telecommunications.
Travel	This includes all University travel requirements, such as flights, hotels and car hire.

**Below is the spend data by category for each RMIT Global Entity**

RMIT Australia

Modern Slavery Categories	% of spend
Equipment, Repairs & Maintenance	29%
Contractors & Consultants	21%
IT Support & Maintenance	13%
Facilities Management, Lease & Rental	12%
Finance, Tax, Insurance & Other	7%
Advertising, Marketing & Promotional Expenses	6%
General & Administrative Expenses	5%
Consumable Materials	3%
Telecommunications & Postage	1%
Travel	1%
Staff & Student Related Expenses	1%

RMIT Spain

Modern Slavery Categories	% of spend
Contractors & Consultants	34%
Facilities Management, Lease & Rental	27%
Advertising, Marketing & Promotional Expenses	17%
Staff & Student Related Expenses	6%
Equipment, Repairs & Maintenance	5%
Telecommunications & Postage	5%
Consumable Materials	2%
General & Administrative Expenses	1%
IT Support & Maintenance	1%
Finance, Tax, Insurance & Other	1%
Travel	0%

RMIT Vietnam

Modern Slavery Categories	% of spend
Finance, Tax, Insurance & Other	33%
Equipment, Repairs & Maintenance	22%
Contractors & Consultants	13%
Facilities Management, Lease & Rental	13%
Advertising, Marketing & Promotional Expenses	8%
General & Administrative Expenses	3%
IT Support & Maintenance	3%
Staff & Student Related Expenses	3%
Telecommunications & Postage	2%
Consumable Materials	1%
Travel	1%
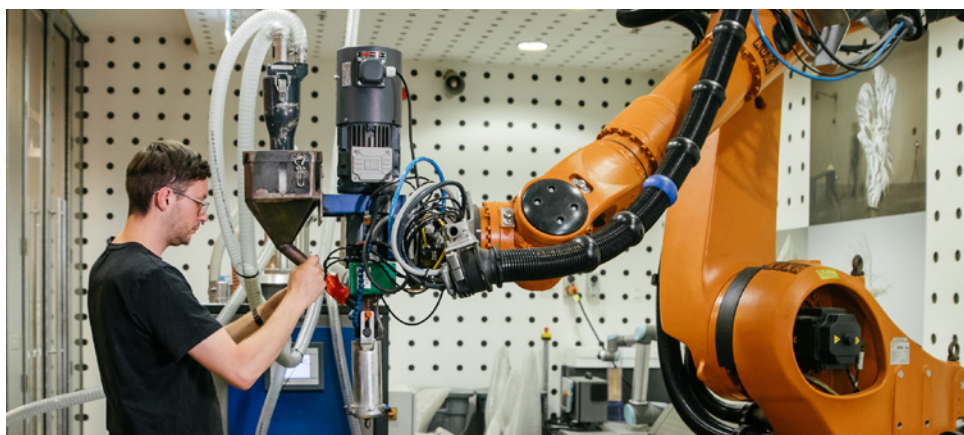
Managing our supply chain risks

We acknowledge that whilst the majority of our Tier 1 suppliers are based in Australia, some of these suppliers may have complex supply chains, and source inputs from higher risk geographies. Due to the limited visibility of our extended supply chain, we recognise the risk that we are causing, contributing, or directly linked to modern slavery practices.

At this time, we have not yet performed an analysis of modern slavery risks beyond our Tier 1 suppliers. However, we aim to expand our visibility of Tier 2 and beyond as we improve the maturity of our practices.

Corporate Social Responsibility framework

The RMIT Corporate Social Responsibility (CSR) framework is applied in the procurement process to meet these principles and to ensure that suppliers meet the minimum requirements regarding their own ethical practices. The CSR framework includes a comprehensive screening process for all prospective suppliers and the signing of the RMIT Supplier Code of Conduct as a requirement of the contract process.

All Australian tenders have a weighting for sustainability, Indigenous and student engagement outcomes and sustainability outcomes are also driven through the contract management process with existing vendors.

Supplier and partner contracts and agreements

Our supplier and partner agreements were updated during 2020 to include specific clauses on modern slavery, including the University's standard Services Agreement, Licence to Occupy, and Purchase Order Terms and Conditions. Localised versions of these contracts are now in full use by our owned and controlled entities outside of Australia to ensure compliance with relevant legislation in the respective region.

These agreements do not require updating each year, and our legal and compliance teams were consulted during the development of the 2021 statement and have confirmed the currency and appropriateness of the relevant clauses.

Current supplier and partner agreements include a right to audit clause. In 2021, we did not engage in any supplier audits, but we do engage with our high-risk vendors throughout the year to ensure they remain compliant.

Due diligence processes and procurement systems

During 2021, we continued to operate our supplier due diligence program, applying the screening methodology defined within our CSR Due Diligence Guideline to all new and renewing Tier 1 suppliers across all entities. Informed by the RMIT Corporate Social Responsibility Framework, and underpinned by the RMIT Risk Management Process, the Guideline outlines the approach taken to assess and mitigate potential risks associated with the proposed supplier or partner, including modern slavery risk.

To complete this screening process, prospective suppliers are required to complete the University's Supplier / Partnership Questionnaire, which includes specific questions on modern slavery risks.

In June 2021, we implemented the Workday Enterprise Resource Planning System, incorporating a common supplier registration process for all new suppliers.

The newly implemented Supplier Registration Form captures key information on each supplier during onboarding, including their acknowledgement of our Supplier Code of Conduct, and requests supplier responses on human rights (including modern slavery) labour standards, and environmental practices.

This information is then made visible in summary format to all RMIT staff who use the Supplier search function in the Workday system, so they are able to better identify those that have acknowledged the Supplier Code of Conduct and considered their obligations on human rights, labour standards and modern slavery.

Training and awareness

In 2021, our Procurement Team were provided with focused training to improve their awareness of modern slavery risks within our supply chain.

Looking ahead, there is an opportunity to extend our modern slavery awareness and training more broadly within the University and amongst external parties, in line with our role as a reputable academic institution.

High-risk spend categories

The following information outlines the associated risks and actions we are taking to address the specific categories of suppliers which have higher risks of modern slavery:

Property Services Vendors – Business As Usual Operations

Inherent modern slavery risks

Services delivered by our Property Services vendors are essential to the operation of our campuses. Within the 'Equipment, Repairs & Maintenance' and 'Facilities Management' spend categories, a variety of Property Services vendors are engaged on an ongoing basis to support our on-campus operations. These vendors include cleaning services, security, building maintenance, waste management, vertical transport (lifts and elevators), removals and mail room services.

Industries of this nature may pose a key modern slavery risk relevant to service procurement, where personnel may be subject to the withholding of wages, immigration-related coercion and threats, debt bondage, confiscation of personal and travel documents, and dangerous and substandard working conditions.

Actions Taken

In addition to the contractual clauses on modern slavery and the supply chain due diligence practices as previously outlined, we continue to apply actions and controls to reduce the identified level of modern slavery risk.

This includes:

■ Centralised engagement and management of the Property Services vendors and supplier panels. This ensures a consistent approach in raising vendor awareness of and discussing concerns associated with modern slavery risk. It also ensures that vendors and supplier panels obtain and discuss changing contractual & legislative obligations related to modern slavery risks as they arise.

■ In Property Services monthly labour law compliance checks are performed by our vendor management team for our high-risk vendors, supported by quarterly and half-yearly ethical audits for all vendors.

Property Services Vendors – Construction

Inherent modern slavery risks

The construction work performed in upgrading and constructing new buildings may present risks of modern slavery. Property Services also has a range of panels in place to provide access to pre-qualified suppliers for building services, construction, Hazmat removal and furniture supplies.

The construction industry can be vulnerable to sub-standard working conditions, poor safety practices and worker exploitation. The risks are primarily driven by the construction industry's competitive bidding process.

In addition, construction companies may source materials from countries considered at a higher risk of modern slavery

Actions Taken

Centralised management of Property Services vendors and supplier panels includes the Builders Panel, in which members are prequalified for construction projects under $5M subject to demonstrated continual compliance with panel agreements including the upholding of labour standards and modern slavery risk minimisation.

Non-panel construction services are subject to tender and include a comprehensive CSR screening process and the signing of the RMIT Supplier Code of Conduct as a requirement of the contract process. All tenders also have a weighting for sustainability, Indigenous and student engagement outcomes and sustainability outcomes. In 2021, RMIT did not commission any non-panel construction services.

Electronics and IT hardware (computers, audio-visual, etc.)

Inherent modern slavery risks

The use of electronics is essential for students and staff during our everyday operations, including the use of computers, projectors, audio-visual equipment, and associated networking and peripheral devices on our campuses. Electronics and hardware have a high modern slavery risk, most prevalent in the raw material extraction that occurs to supply the electronics industry, including the mining of conflict minerals, where workers may be subject to dangerous and life-threatening working conditions.

The risk of modern slavery is also present during the manufacture of electronic goods in high-risk geographies, where forced labour may be present.

Actions Taken

The procurement process for electronics and IT hardware follows our organisation-wide due diligence procedures, screening for suppliers that may have indicators of higher modern slavery risk. This process has been described on page 20.

The Agreements for the supply of IT and audio-visual hardware give RMIT the right to audit to ensure Ethical Employment and legislative rights are fully complied with, including labour standards and modern slavery obligations. The two supply arrangements are to be reviewed in 2022 for further legislative and operational improvements, including supply chain reporting comprehensiveness and audit.

IT development and hosting services

Inherent modern slavery risks

As a technology-driven university, we continue to rely on our hosted IT services, including learning and administrative platforms. As such services are often hosted and supported overseas, the risk of exploitation and mistreatment for offshore technology providers is present in these sectors, including IT development, hosting and support.

Actions Taken

Acting on the modern slavery risk indicators present in IT development and hosting services; we continue to utilise our standard Services Agreement for new and renewing IT suppliers. In 2021, we engaged with a prospective IT supplier to assess the level of modern slavery risk, raising awareness of this issue and ensuring understanding of modern slavery clauses in our agreement.

Laboratory supplies, office supplies and furniture

Inherent modern slavery risks

In many areas of our campus operations, we utilise products such as laboratory and classroom supplies (e.g., rubber gloves, chemicals, paper, and stationery) as well as equipment for ongoing use (e.g. tables, chairs, desks, and other furniture). The manufacturing of the associated input materials has a high risk of modern slavery as they may include forced labour, child labour and more broadly, instances of sub-standard and exploitative labour conditions, where informal and unregulated suppliers are common.

These risks may come from activities such as the harvesting of natural rubber for rubber glove production, and the cultivation of plants and timber used in furniture and paper processing.

Actions Taken

All new and renewing suppliers of laboratory supplies, books and printing, furniture and stationery undergo our procurement screening procedures, with specific steps for assessing modern slavery risk indicators of suppliers.

As of 2021, all RMIT Lab Consumables Panel Agreements explicitly require that the suppliers ensure their suppliers also comply with the RMIT Supplier Code of Conduct, relevant human rights and modern slavery obligations. RMIT has full right to access and audit operations & records to verify compliance.

The RMIT Furniture Panel is required to ensure that they only supply furniture to RMIT which complies with the RMIT Furniture Standards. The standard requires furniture supplied to meet all relevant Australian standards, including but not limited to sustainable product certification schemes such as GECA FFM v.3.0-2017 and GreenRate Level A. Assessments under many of these certification schemes take into account corporate social responsibility, labour standards and modern slavery risk management. The Panel will formally commence in May 2022, having been through a rigorous tender process.

RMIT has a single whole-of-university supplier for office supplies and stationery in order to ensure products are sustainably sourced. As of 2021, the Agreement explicitly requires that this Tier 1 supplier ensures its suppliers also comply with the RMIT Supplier Code of Conduct, relevant human rights and modern slavery obligations. RMIT has full right to access and audit operations & records to verify compliance.

The existing centrally managed agreements for printing services were also amended in 2021 to incorporate similar human rights and modern slavery risk management obligations.

RMIT Store (clothing and merchandise)

Inherent modern slavery risks

The RMIT Store has a range of branded products, such as jumpers, shirts, and merchandise sold online and on campus. Though not a large category of spend, items available to students, staff and the public are highly visible, branded items are produced by third-party clothing and textile manufacturers.

Clothing and merchandise products have the potential to have a high risk of modern slavery, this is mainly during the sourcing of input materials and manufacturing. These risks are often in the form of forced or slave labour.

Actions Taken

For several years, the RMIT Store has engaged with the University's Sustainability Team and external guidance to improve its ethical sourcing and supply chain transparency practices. In 2021, the RMIT Store has continued to enhance its approach, performing extensive supplier screening practices that seek information beyond Tier 1 suppliers, including supplier audit reports and corrective action plans.

The RMIT Store's purpose-built tools have been used throughout the year, including its Supplier Risk Assessment, Supplier Self-Assessment, and Supplier Traceability Form.

The ethical sourcing practices of the RMIT Store are distinct and bespoke, catering for the modern slavery risk profile of the goods sold. These practices are in addition to our broader supplier due diligence processes.

Directly procured food and beverages
(RMIT kitchens, tea points and meeting rooms)

Inherent modern slavery risks

RMIT has kitchens, tea points and meeting rooms that provide beverage supplies such as tea, coffee, and sugar. Food procurement may present a risk of forced labour and instances of sub-standard and exploitative labour conditions in supply chains and during processing.

Actions Taken

As a Fair Trade University since 2009, RMIT preferences products that maintain a third-party certification that provides for fair and equitable protection of food producers, namely Fair trade certified products. This is in addition to our standard procurement due diligence processes.

On-campus retailers

Inherent modern slavery risks

Retail and hospitality industry workers can be vulnerable to sub-standard working conditions and underpayment of wages, industry-specific factors driven by the casual and seasonal nature of this work. Certain goods, such as seafood, dried fruit and nuts, coffee, palm oil, cocoa, coconut, and rice are at high risk of forced labour, human trafficking and debt bondage.

RMIT leases space to external vendors who operate on-site to sell food and beverages. These are treated as RMIT tenants and therefore operate outside of our centralised procurement practices.

Actions Taken

Contractual arrangements are in place with our on-campus retailers via our Licence to Occupy agreement. We have identified that the current agreement template speaks to legal compliance, but does not include clauses specific to modern slavery risk, human rights, or fair working conditions for retailer personnel.

5. Our Philanthropic Investments

A tertiary education can transform the lives of students, giving them the opportunity to access knowledge and pursue their passion.

RMIT Philanthropy connects the University's community of supporters – donors, staff, alumni, industry partners and students - with University initiatives they are passionate about to deliver strategic funding and support that advances RMIT's ambitions.

To effectively manage and further the impact of donations, the executive-led Philanthropy Committee is responsible for managing the RMIT Philanthropy Fund, including implementing the RMIT Responsible Investment Principles.

As of 31 December 2021, we held $102.3m in philanthropic funds across a range of investments, including equities, bonds and cash.

One hundred per cent of the equity component of our philanthropic funds are invested in two responsible investment products:

- Russell Investments Sustainable Global Shares ex Fossil Fuels Fund: a fund that invests in a broad range of global shares, with a 60% reduced exposure to carbon emissions compared to the MSCI ACWI ex Australia Index.

- Russell Investments Australian Responsible Investment ETF: a fund that invests in Australian shares and trusts listed on the ASX that also excludes companies with fossil fuel reserves.

Additionally, RMIT utilises a small component of its philanthropic funding to undertake 'impact investing' which is an investment designed with the intention of generating a measurable, beneficial social or environmental impact alongside a financial return.

Since 2019, RMIT has been working with Skalata Ventures, a not-for-profit organisation that runs an independently funded seed program to scale and grow early-stage companies into significant and sustainable businesses. This fund supports future pathways and seed investments for the start-up community such as those which are developed through the RMIT Activator program.

Inherent modern slavery risks

There is a level of risk of modern slavery within the underlying asset holdings of any investment product. The combined modern slavery risk profile across the underlying assets is complex, with many of these assets being exchange listed companies with global operations and international, multi-tiered supply chains. Some of these companies are required to produce a modern slavery statement under the Act, with this level of reporting providing greater transparency of asset level modern slavery risk programs to investors.

Actions Taken

The University invests through a 'pooled funds' structure, where investments are not directly held by the University. Pooled funds are those where there are several different types of investors whose money is 'pooled' and invested together.

The use of pooled funds means that direct investment decisions, such as whether to buy the shares in an individual company are not made by the University. Instead, RMIT works with an asset consultant to set parameters on the Environmental, Social and Governance (ESG) impacts of its investments. The asset consultant then assists the University in finding suitable investment products that best match the University's ESG parameters.

The RMIT Responsible Investment Principles guide our investment managers, to ensure that our portfolio minimises activities that have a material impact on climate change, including involvement in fossil fuels, while screening for issues relating to public health and wellbeing, including human rights and modern slavery. We will also monitor the portfolio in relation to globally accepted norms on corporate sustainability behaviours to ensure we meet our commitments to the UN Global Compact.

RMIT also requires our investment managers engaged to be a signatory to the UN Principles for Responsible Investment (PRI). PRI is the world's leading proponent of responsible investment. The PRI works with its international network of signatories toput the six Principles for Responsible Investment into practice. Its goals are to understand the investment implications of environmental, social and governance issues and to support signatories in integrating these issues into investment and ownership decisions.

During 2021, RMIT did not perform a dedicated modern slavery risk assessment on our portfolio of investments due to our indirect investment structure. Despite the absence of a modern slavery risk assessment, we have deemed the inherent risk of modern slavery within our investment holdings to be low, considering the responsible investment screening practices in place throughout the year. RMIT's external investment manager Russell Investments publish their own Modern Slavery Statement which can be found online.

6. Continuing Our Journey

Grievance reporting and remediation

Our Whistleblower Procedure is our primary mechanism for anyone to report concerns they may have about illegal, unethical or improper conduct involving RMIT or its staff, Council members, students or researchers while protecting the person making the report. We continue to operate an externally managed whistleblower hotline, Stopline, and in 2021 did not receive any whistleblowing allegations or complaints that included indicators of modern slavery.

We are committed to improving the level of awareness of our whistleblower service, and in 2022 we will take action to communicate this service to our external stakeholders, including suppliers and partners.

For our student population, Safer Community is our dedicated service for students and staff to report unwanted or threatening behaviour, including whether they are experiencing, or know someone who is experiencing, substandard treatment.

We have identified the need to develop dedicated procedures to effectively respond to identified instances of modern slavery in our operations or supply chain. At present, any such instances would be responded to in accordance with our existing policies and procedures, however, this has been identified as a focus area for future action.

Assessing our Effectiveness

In 2021, we retained our focus to establish core capability and commence capacity building, improve data, initial risk awareness, and due diligence activities.

Key achievements in improving processes to monitor the effectiveness of our actions include:

1. Increased regularity of updates to RMIT's Audit and Risk Management Committee.

2. Enhanced data capture of supplier information in our procurement platform, to provide for better measurement and reporting of supplier compliance to University policies and procedures. Whilst implemented in 2021, this functionality was not fully utilised, and is an area of development in 2022 – monitoring of supplier compliance will enable us to measure the effectiveness of our modern slavery risk program in future.

3. Integration with our internal audit program, with the commencement of planning in late 2021 for future audits over our procurement function, including recent improvements to identify and manage modern slavery risk. The first audit of this program was conducted in early 2022.

More broadly, our assessment of effectiveness continues to mature through the enhancement of our risk framework and compliance framework, drawing upon the Deming cycle of Plan, Do, Check, Act as we cycle through development, implementation, analysis, and improvement.

Looking to the future

We recognise that our response to modern slavery is in its developing stages and we remain committed to improving our capabilities and practices in years to come.

Our focus in the short-term centres on key priority actions outlined below:

- Review how modern slavery can be further incorporated into the RMIT Policy Framework.

- Utilise the Modern Slavery Working group fostering engagement between relevant business areas and owned controlled entities to validate and implement the maturity model, and input into the preparation of each year's modern slavery statement.

- Improve visibility of our supply chains, extending beyond tier one, and ensure adequate oversight of owned and controlled entities' unique modern slavery risk profile.

- Communicate our whistle-blower service to staff, students, suppliers, and any third parties, providing training on when and how to use the service.

- Enhance grievance handling and remediation processes, developing a policy and procedures defining how we will respond to identified instances of modern slavery in our operations or supply chain.

- Expand training and awareness programs to staff, suppliers, and students as relevant and appropriate, utilising Workday to allocate training courses and modules, and measure completion.

- Add a specific clause on fair and safe working conditions for retailer personnel, and modern slavery risks to future Licence to Occupy agreements for on-campus retailers.

- Roll out the new due diligence processes and procedures to provide for student safety and care, during WIL programs and volunteering activities.

In 2022, we will work with an external specialist to develop a staged maturity model. This model will inform our prioritised and practical strategies to improve the maturity of our modern slavery program over the short, medium, and long term, focusing on policy and governance, risk assessment, supply chain transparency, staff development, and remediation.

Index

The Modern Slavery Act sets out seven mandatory criteria for the content of statements:

Criteria	Reference
Identity of reporting entity	P 6
Description of structure, operations and supply chains	P 5 - 10, 16 - 18
Description of identified modern slavery risks	P 11
Description of actions taken to assess and address modern slavery risks	P 13 - 26
Description of how the reporting entity has measured the effectiveness of those actions	P 27 - 28
Description of the process of consultation with owned or controlled entities	P 6, 9
Other relevant information	Throughout

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