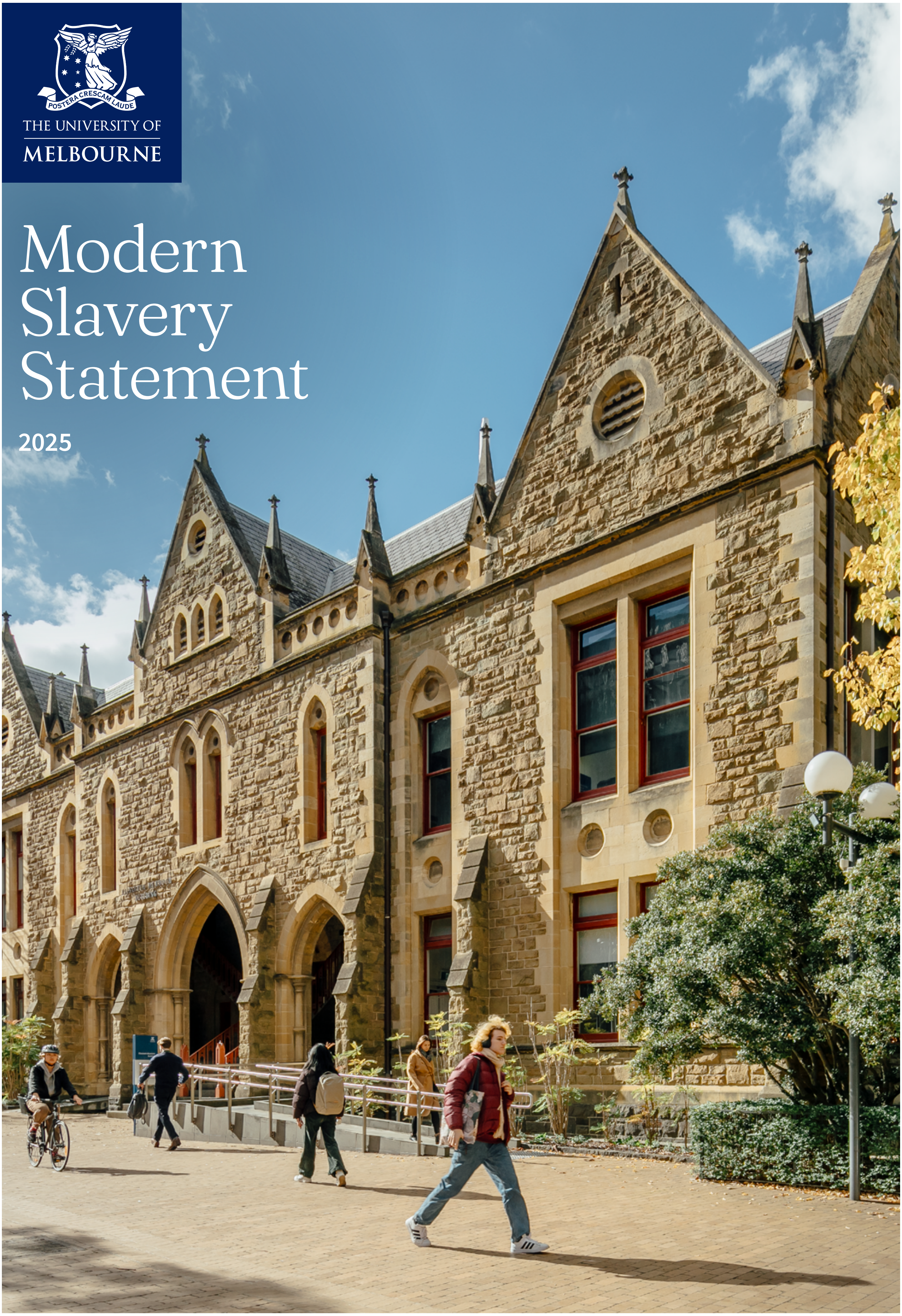
THE UNIVERSITY OF MELBOURNE

Modern Slavery Statement

2025



Contents

Acknowledgement of Traditional Owners

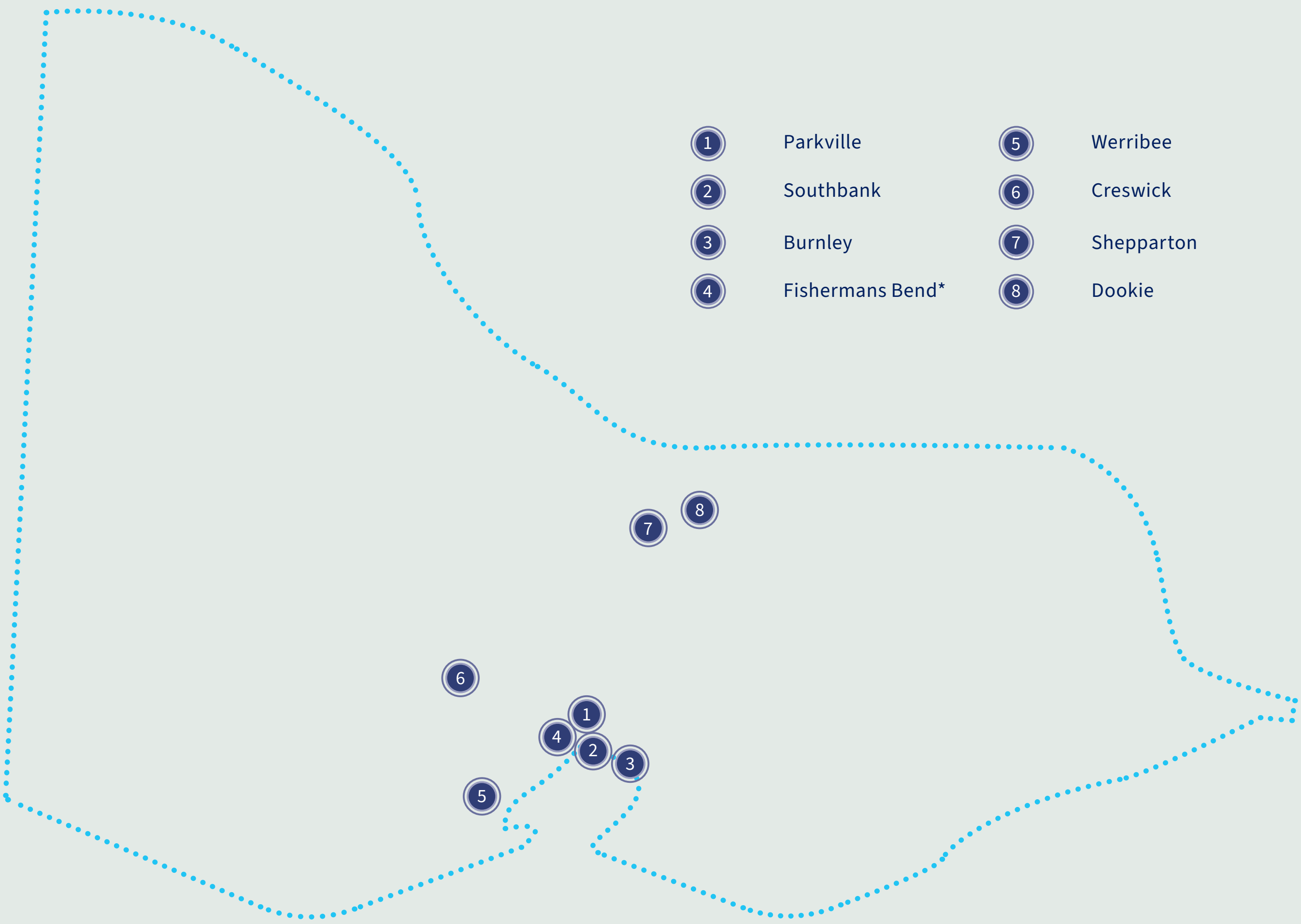
The University of Melbourne acknowledges the Traditional Owners of the unceded land on which we work, learn and live: the Wurundjeri Woi Wurrung and Bunurong peoples (Burnley, Fishermans Bend, Parkville, Southbank and Werribee campuses), the Yorta Yorta Nation (Dookie and Shepparton campuses), and the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

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

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

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

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



* Work on Fishermans Bend campus is paused.

Introduction

This statement has been prepared pursuant to the *Modern Slavery Act 2018* (Cth) and outlines actions taken by the University of Melbourne to identify, assess and address modern slavery risks in its operations, supply chains and controlled entities from 1 January 2025 to 31 December 2025.

This Statement is made on behalf of the University of Melbourne and the following entities it owns or controls[1]:

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

This is our sixth Modern Slavery Statement and was approved by Council on 24 June 2026.

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

Understanding modern slavery

Modern slavery refers to situations where individuals are exploited through coercion, threats, or deception, resulting in the loss of their freedom. These severe forms of exploitation include:

- Human trafficking
- Slavery
- Servitude
- Forced labour
- Debt bondage
- Forced marriage
- Child labour

Modern slavery risk categories

In this Statement, the University reports its actions across three key categories. This approach is aligned to the University's regulatory framework.

1. Operations

i) Students: Protecting students from exploitation
ii) Research: Ensuring innovation is not built on exploitation
iii) Investments: Ensuring responsible financial investments

2. Supply Chain

i) Cohort risk: Suppliers where the University's environment makes up a high market share of their sales
ii) Category of spend risk: High-risk industries including textiles, electronics, cleaning and agriculture
iii) Geographic risk: Locations where modern slavery is more prevalent due to weak labour protections, political instability or systemic poverty

3. Controlled Entities

i) Supporting consistent application of modern slavery risk management across the University's controlled entities

Our commitment

The University of Melbourne is committed to identifying, preventing and managing modern slavery risks across its operations, supply chains and controlled entities. It is equally committed to upholding ethical conduct, responsible procurement and respect for human rights.

The University considers that its actions demonstrate an ongoing commitment to the prevention of modern slavery but acknowledges its approach could be further strengthened.

Additional actions, as outlined in this Statement, will support the University in continuing to minimise the risk of exploitation across its operations, supply chains and controlled entities.

The University of Melbourne's Modern Slavery Statement is endorsed by the University Council and signed by the University's Interim Vice-Chancellor, Professor Glyn Davis AC.

About the University of Melbourne

Established in 1853, The University of Melbourne is one of Australia's oldest universities and the first in Victoria. Today, the University's vibrant community comprises more than 76,000 students[1]. This includes international students from more than 150 countries who enrich the experience of all who work and study at the University. Students are supported by more than 13,000 academic and professional staff[2], who play a vital role in fulfilling the University's mission.

University Council formally approves the 2025 Modern Slavery Statement with the support of the following Committees:

01. **University of Melbourne Council (Council) –** The University's Peak Governance Body

02. **Audit and Risk Committee (ARC) of Council –** The University's Governance Level Risk Committee and subcommittee of Council.

03. **University Executive (UE) –** The University's Principal Management Committee that includes Deans and the Vice Chancellor's Advisory Group

04. **Risk Management and Compliance Sub-Committee (RMCC) of the University Executive –** The University's Management Level Risk Committee

05. **Modern Slavery Compliance Processes and Operation Activities –** Overseen by Modern Slavery Working Group that reports to the CFO as Sponsor

Modern slavery risk governance structure 2025

As part of its commitment to continuous improvement, the University of Melbourne has established a governance framework to identify, manage and mitigate modern slavery risks.

The Modern Slavery Working Group reports annually to the Chief Financial Officer. It includes representatives from Research, Student and Scholarly Services (SASS), Procurement, Investment, Legal and Risk and University Governance. The Working Group is responsible for monitoring and reviewing modern slavery risks.

1 This figure represents total enrolled student headcount.

2 This figure represents headcount.

Modern slavery regulatory framework 2025

This governance structure is supported by University policies and frameworks, which provide guidance and establish guardrails for its operation.

Operational

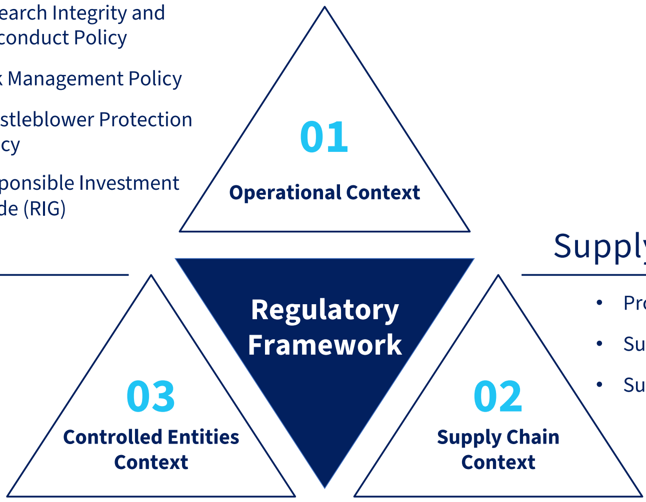
- Appropriate Workplace behavior Policy
- Child Safety Policy
- Contracts Policy
- Fraud and Corruption Management Policy
- Research Integrity and Misconduct Policy
- Risk Management Policy
- Whistleblower Protection Policy
- Responsible Investment Guide (RIG)

Controlled Entities

- Controlled Entities Policy

Supply Chain

- Procurement Policy
- Supplier Code of Conduct
- Supplier onboarding process



Risk management practices

Operations

Students

The University of Melbourne has more than 76,000 students, including 46 per cent international students. Students participate in work-integrated learning (WIL) opportunities, discipline-specific placements, co-curricular programs and experiential activities that enrich learning and the campus experience.

Risks

Student-related modern slavery risk varies by setting. Off-campus activities, including employment, placements and internships, are considered higher risk and apply to at least 20 per cent of students. Risk also varies by cohort with international students at heightened risk of exploitation.

Risk management

The University manages student-related modern slavery risks through a range of preventative and support measures.

The Student and Scholarly Services (SASS) portfolio provides an integrated, end-to-end trusted support function across the student lifecycle - from enquiry and enrolment through to wellbeing, academic skills, careers and employment services, into graduation, transition to work and alumni engagement.

Staff involved in coordinating student-facing recruitment and placement activities undertake mandatory compliance training to build awareness of modern slavery risks to students and appropriate risk management practices.

The University also delivers a student volunteer induction module, which includes content to educate students on modern slavery risks associated with volunteering.

The Work Rights Hub provides free, confidential support to migrant and temporary workers on their workplace rights. It is funded by the Commonwealth Government's Modern Slavery Grants Program and delivered by the Australian Red Cross in collaboration with universities. The Hub is promoted to students and helps reduce the risk of exploitation, particularly among international students. It also offers referrals and connects individuals with trusted support services.

Research

The University of Melbourne is a comprehensive research institution addressing complex global challenges through innovative, investigator-led and interdisciplinary collaboration. The University works with academic and industry partners to explore solutions to major societal issues. In 2025, the University received $672m in research income and managed approximately 5,000 externally funded research projects.

Risks

Modern slavery risks may arise within research supply chains, including in the procurement of equipment, data collection activities, external collaborations and subcontracted arrangements.

Risk management

The Deputy-Vice Chancellor (Research) is responsible for research and oversees all research activity across the University. A central research support function manages research funding, contracts and shared services. This function works with specialist teams responsible for ethics, integrity and research infrastructure to ensure research activities are conducted in accordance with the *Australian Code for the Responsible Conduct of Research* (2018) and relevant University policies.

All research activities are assessed to identify potential risks, including exposure to modern slavery. This includes considering the nature of the work and any external partners, particularly those operating in higher-risk countries with weaker labour protections. Research involving human participants, their data or biological samples undergoes formal ethics review and approval prior to commencement.

The University undertakes due diligence for activities involving external partners or suppliers assessed as higher risk. Lower risk activities proceed with appropriate approvals, while higher risk matters are escalated to Faculty leadership and subject to senior oversight. This ensures risks are effectively managed and remain within acceptable limits.

Investments

The University holds financial investments as part of its assets. These funds are externally managed by the University's Implemented Consultant, JANA, and are made up of diverse asset classes including Australian and international equities, private equity, debt, infrastructure and property.

Risks

The University recognises that modern slavery risks can arise through investment portfolios, particularly via the operations and supply chains of investee entities. These risks involve actual or potential harm to people, including workers engaged directly or indirectly by investee companies and their suppliers.

The University does not generally hold direct ownership of shares or exercise operational control over investee companies. However, it acknowledges potential indirect exposure to modern slavery risks through their operations and supply chains, particularly in higher-risk sectors or jurisdictions.

In assessing its exposure, the University considers the following:

- Causing: Risk is considered low, as the University does not employ workers or manage investee operations or labour practices.
- Contributing: The University may indirectly contribute where its investment capital supports activities with elevated labour or supply chain risks, especially in higher-risk sectors or locations.
- Directly linked: While the University has no direct relationship with underlying investee companies due to pooled investment vehicles and external managers, it may still be indirectly linked to risks through investee activities and supply chains, including beyond Tier 1 suppliers.

JANA applies a risk-based approach to modern slavery due diligence conducted by appointed external investment managers. It has identified that higher modern slavery risks occur in international investments, particularly in emerging markets and higher-risk sectors such as materials and agriculture, as well as in property assets, including construction, building works, and services like cleaning.

Risk management

Modern slavery risks within the University's investment portfolio are managed in accordance with the University's **Responsible Investment Guide (RIG)**.

JANA requires all external investment managers to demonstrate strong sustainability practices and to integrate environmental, social and governance (ESG) factors, including modern slavery risks, into investment decision-making. Where required, JANA engages managers to strengthen risk identification, improve supply chain oversight and drive engagement with high-risk investee companies.

Effectiveness is monitored through regular reporting by JANA and investment managers, ongoing assessment of managers' ESG practices and periodic University reviews of JANA's performance and responsible investment capability. The University reviews its RIG on an 18-month cycle to ensure it remains current and aligned with evolving best practice.

Supply chain

The University's supply chain encompasses all goods and services needed to operate a global institution, supporting education, research, campus life, and corporate functions. It spans construction, research, teaching, facilities management, technology and corporate operations.

Each year, over $1.06 billion flows through this network, connecting the University to suppliers across many sectors and countries. The scale, complexity and diversity of this supply chain make it a critical focus for managing modern slavery risks and ensuring the University's values are upheld.

2025 spend profile*

$1.06bn
Spend
(↓ $40m since 2024)

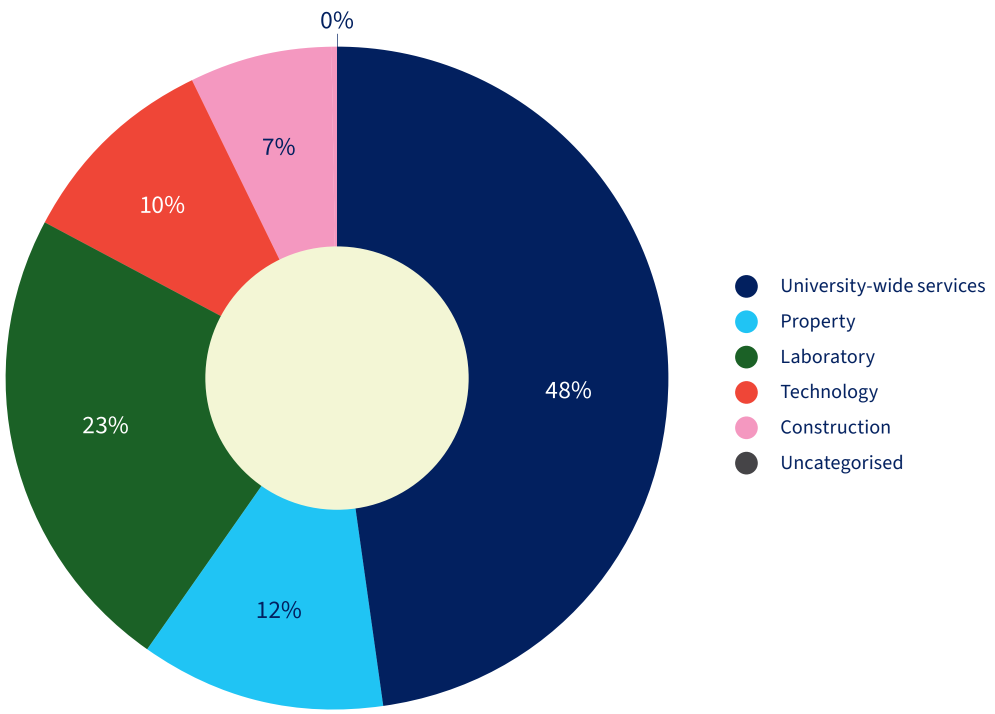
11,286
Suppliers
(↓ 9% since 2024)

57
Countries
(+ 15 since 2024)

80%
of spend with **794** suppliers
(↑ 213 since 2024)

* 2025 data reflects University expenditure on the procurement of goods and services, excluding grants and payments to affiliates. For comparison with prior year, these categories have also been excluded from 2024 data.

2025 Third-party spend by category

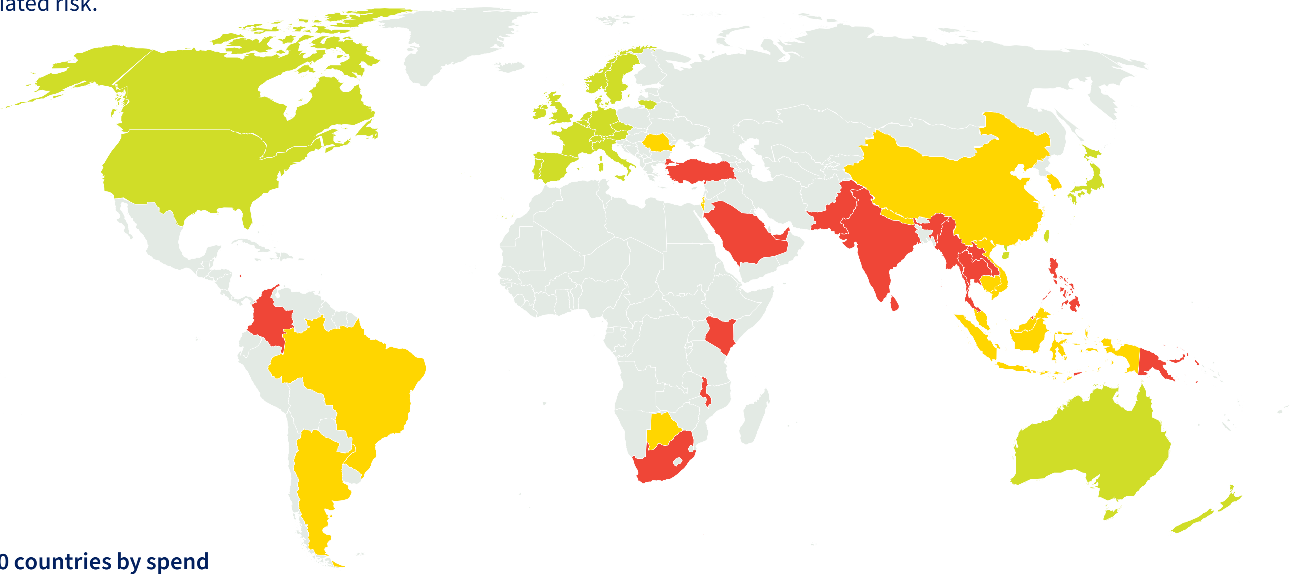


University-wide services	Property	Technology	Construction	Laboratory
Human resources Library services Logistics & storage Marketing Office consumables Professional services Student services Teaching Travel & entertainment	Facilities management Property management Research services Utilities & renewables Vehicle & plant	Audio visual IT hardware IT networks IT services IT software Telecommunications	Consultant services Furniture & fittings Works contractors	Laboratory consumables Scientific equipment

Geographical risk

In 2025, the University purchased from 57 countries worldwide. The map shows the location of these suppliers and the level of associated risk.

- Green: low risk
- Yellow: moderate risk
- Red: high risk



Top 10 countries by spend

Country	Risk status	% of 2025 spend	Number of suppliers
Australia	Low	87.18%	5,137
United States of America	Low	1.44%	217
Hong Kong	Low	0.66%	20
United Kingdom	Low	0.52%	100
Singapore	Low	0.43%	27
China	Medium	0.41%	38
New Zealand	Low	0.35%	31
India	High	0.33%	38
United Arab Emirates	High	0.22%	3
Ireland	Low	0.22%	8
TOTAL	—	**92.36%**	**5,619 (~50% of suppliers)**
Total medium and high risk	—	**0.96%**	**79**

Category of spend risks

The University uses a widely accepted list of at-risk spend categories to assess and evaluate modern slavery risk across its procurement activities. These categories of spend are considered at risk due to:

- Low supply chain transparency arising from multi-country contract manufacturing
- Potential exposure of low-wage and migrant workers to exploitation

Cohort risks

Cohort risks are associated with three specific categories of spend where there is either high category of spend and/or geographical risk, and where the University's spend is a high market share of a supplier's sales.

1. Research and medical consumables

This category remains a priority high-risk area due to:

- Highly fragmented, multi-tier supply chains
- Potential exposure to high-risk manufacturing sectors (e.g. laboratory consumables and medical disposables) and high-risk jurisdictions
- Limited direct visibility beyond Tier 1 suppliers

2. Research equipment

This category has been identified as a priority high-risk area in 2025 due to:

- Highly fragmented, multi-tier supply chains
- Likely inclusion of components sourced from higher-risk geographic regions
- The University's position as a key customer with greater potential influence

3. Education agent agreements

This category has been identified as a priority high-risk area in 2025 due to:

- Category of spend and contract type that is unique to the University sector
- Service delivery that may involve higher-risk regions

Risk management

In previous years, the University assessed supply chain modern slavery risk using two key salient risk factors: geographic region of manufacture or delivery and category of spend. These factors were used to identify focus areas.

In 2025, to maximise impact in target areas of greatest influence, the University introduced a third salient risk factor: cohort risk. This refers to suppliers with a high market share of sales tied to the University's environment.

The University continues to support a dedicated portal for reporting concerns related to modern slavery. The functionality and access protocols for this platform remain unchanged from previous reporting periods to ensure continuity and trust in the reporting process.

Previously, supplier assessment processes — including modern slavery risk assessment — were manual with data dispersed across systems. This resulted in inconsistent monitoring and occasional gaps in visibility. In 2025, the University rolled out Workday, which is helping to revolve these issues. Legacy risks associated with historical processes remain relevant.

Controlled entities

The University's controlled entities, both in Australia and overseas, are detailed in the table to the right. Oversight of controlled entities is an integral part of the University's broader governance and compliance framework.

Risk

The modern slavery risk is low for most controlled entities. This is due to operations being predominantly Australian-based, professional workforces, direct recruitment practices and small domestic supply chains.

Higher inherent risk exists for entities with international operations or external delivery partners. These entities are subject to improved monitoring and tailored support, as outlined in this Statement.

Risk management and consultation

Controlled entities actively identify and manage modern slavery risks, including recruitment, child labour and supply chain risks.

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

Modern Slavery Risk	Controls
Recruitment	Australian-based entities primarily use direct hiring models, with associated processes and onboarding aligned to University practices. Most entities no longer use recruitment agencies or labour-hire intermediaries, ensuring full oversight of the recruitment chain. For higher-risk overseas operations, such as in China and India, zero-fee recruitment policies have been adopted. These are supported by contractual prohibitions on charging recruitment fees or retaining identity documents. For example, Australia India Institute Private Limited ensures strict compliance with ethical recruitment standards in accordance with Indian labour laws and international best practice and does not engage recruiters who further subcontract recruitment activities. All recruitment is undertaken through verified and transparent processes, supported by strict monitoring arrangements, contractual compliance obligations, audit requirements and a zero-tolerance approach to unethical practices. In jurisdictions including China and Singapore, licensed local HR and payroll providers (such as FESCO) are engaged to ensure strict compliance with host country labour laws.
Child labour	A universal prohibition on employing individuals under the age of 18 is enforced, supported by mandatory verification of government-issued identification during recruitment. The nature of subsidiary operations, which often require specific professional qualifications, provides further institutional safeguards against child labour risks.
Supply chain	Controlled entities apply the University's Supplier Code of Conduct and Procurement Policy. Entities such as Melbourne University Publishing Ltd and Australian Music Examinations Board (Vic) Ltd conduct annual supply chain risk reviews. Major supplier contracts in overseas operations require approval at Director or Board level. Higher-risk entities have introduced additional controls to strengthen oversight of subcontracting and supplier arrangements. • For example, Nossal Institute Limited's subcontracting arrangements require external organisations to adhere to modern slavery obligations and mitigation practices. This is supported by an internal due diligence assessment process applied during supplier onboarding and ongoing monitoring. • For supplier risk assessments, Australia India Institute Private Limited requires mandatory modern slavery risk assessments at the onboarding stage and as part of periodic annual reviews. These assessments are supported by supplier questionnaires, contractual obligations and ongoing compliance monitoring arrangements.

The **University's Controlled Entities Policy (2024)** establishes a consistent reporting and oversight framework across financial management, risk management and operational policies. Governance requirements relating to modern slavery include the adoption of key integrity and accountability policies such as the **Whistleblower Protection Policy** and the **Fraud and Corruption Management Policy**. Risk registers and risk management frameworks are submitted to the Executive Director of Risk and Assurance. This strengthens University oversight of entity-level modern slavery risks and mitigation.

Biannual entity information sessions and guidance materials are provided to support entities' reporting and compliance obligations. Staff involved in procurement or engagement with groups and individuals overseas are offered targeted training.

Entities complete an annual modern slavery survey, providing information on modern slavery risks within their operations and supply chains, and the actions taken to identify, address, and monitor these risks. The University engages with entities, as required, to evaluate the effectiveness of risk mitigation measures implemented by each entity.

Modern slavery actions in 2025

Operations

Students

The Student Placements Working Group concluded in 2025, delivering recommendations to strengthen risk mitigation in placement settings, including improved mechanisms for identifying and reporting incidents. These recommendations are being considered with an implementation plan due in 2026.

The Student Volunteering Framework was strengthened through the introduction of a Student Volunteer Induction module and a dedicated Leaders of Volunteers online resource, providing guidance and best-practice tools. Employment conditions training for student-facing hiring managers, including modern slavery risk awareness, achieved a 96 per cent completion rate. The remaining 4 per cent is largely comprised of new supervisors, with further measures planned.

Student engagement remained strong, with over 1,200 subscribers to the Student Volunteering Program newsletter and 370 completions of the Student Volunteer Induction Module via the Learning Management System. This engagement will be further supported in 2026.

The University has agreed to include high-risk clauses in its approximately 70 Education Agent Agreements as they are renewed. A supplier guidance resource has been developed to assist education agents in establishing tailored modern slavery risk management plans. The first of these updated agreements, incorporating the strengthened clauses and guidance, will be implemented in 2026.

Research

The Research, Innovation and Commercialisation (RIC) team conducted 237 partner risk assessments, including checks for modern slavery-related activity.

New Research Management and Enterprise Resource Planning (ERP) systems were introduced to optimise risk identification, including system-based flags to trigger due diligence.

Investments

Modern slavery due diligence was conducted by JANA through questionnaires issued to external investment managers. These were informed by the Responsible Investment Association Australasia and Financial Services Council (RIAA–FSC) industry template, assessing:

- Modern slavery policies, governance and accountability
- Identification of modern slavery risks within the external investment managers' own operations and supply chains
- Integration of modern slavery and human rights considerations into investment analysis and stewardship activities, including beyond Tier 1 supply chains
- Geographic, sectoral and asset-class risk factors were assessed

Ongoing qualitative reviews were undertaken through regular research meetings between JANA and external investment managers, including discussion of modern slavery and broader human rights risks. JANA conducted a targeted follow-up review in response to public allegations of labour exploitation at a factory of a third-party supplier in Southeast Asia, as shown in the case study. JANA assessed both the likelihood of modern slavery risks and the level of investor influence across asset classes, recognising variation by jurisdiction and investment type.

Case study: Investments

As part of its investment oversight, the University received reporting from JANA on a modern slavery-related issue involving a listed investee company with global operations and a complex international supply chain. The case arose following public allegations of labour exploitation at a factory of a third-party supplier in Southeast Asia.

JANA engaged the external investment managers holding exposure to the investee company to understand the allegations, the company's involvement and actions taken. It was determined that the investee company was not directly involved in the exploitation of workers, but that gaps existed in their supplier's labour practices and compliance with international labour standards.

The investee company, alerted by a labour rights activist, commissioned an audit of the supplier, which confirmed non-compliance with international standards. Remediation efforts were attempted but ultimately unsuccessful, leading the investee company to suspend its commercial relationship with the supplier. The supplier represented a small portion of the company's operations, and auditing all suppliers was challenging due to scale. Notably, the exploitation identified was permitted under local law but did not meet international labour standards.

Throughout the process, JANA continued to engage with the external investment managers to evaluate supply chain risk management, remediation adequacy and the need for further escalation. The external investment managers maintained that the supply chain risk remained elevated and continued to engage with the investee company.

This case study highlights how modern slavery risks can emerge within complex, multi-tier investment supply chains. It underscores the importance of investor engagement, monitoring, escalation, and stewardship, as well as the limitations of investor influence in addressing risks in large, international supply networks.

Supply chain

The University strengthened supply chain controls to improve the identification and assessment of modern slavery risks. Actions focused on improving risk visibility, embedding modern slavery considerations into core procurement processes, and enabling proportionate responses based on risk severity.

Supplier onboarding and risk assessment

As part of the ERP system upgrade, the University rationalised its supplier base from approximately 13,000 to 7,000 suppliers. A retrospective review of all suppliers was undertaken using the internally developed risk calculator tool.

A total of 2,399 goods and services suppliers were assessed using the risk tool.

This approach applied a practical risk-based lens, ensuring that higher-risk suppliers received additional scrutiny and that the University proactively managed risk across its supply chain.

18 High-risk suppliers	17 suppliers were onboarded after committing to proactively prepare, implement and comply with a Modern Slavery Risk Management Plan. — One supplier was not onboarded due to non-completion of mandatory assessments.
560 Moderate-risk suppliers	548 suppliers remain onboarded following the review process. — All suppliers were asked to attest to seven additional Modern Slavery questions. These help to better understand the risks for both the supplier and the University as purchasers. Suppliers committed to training and policy development with follow-up required during the contract period. Suppliers that failed to answer or did not resolve their risks were offboarded within three months.
1,821 Low-risk suppliers	All suppliers were onboarded.
13 Supplier disengagements	One high-risk supplier and 12 moderate-risk suppliers. — Suppliers failed to respond to the request for additional information.

Systems, tools and processes

In late 2025, the University piloted iPro, a specialist modern slavery assessment platform, within the high-risk furniture category. The platform evaluates supplier operations and extended supply chains against trusted global frameworks and international standards. The platform was used to address identified gaps in risk controls and to support targeted supplier engagement and improvement planning.

The pilot delivered stronger, evidence based visibility of modern slavery risks across key suppliers and their upstream supply chains. It enabled a shift from ad hoc assessments to a consistent, comparable approach that distinguishes between inherent and unmitigated risks

Following assessment, all suppliers within the furniture panel were reduced from an initial high-risk rating to a low-risk rating. Insights have been integrated into the University's standard approach of proactively working with suppliers in high-risk categories to uplift supplier knowledge and internal processes.

In addition, the University uplifted the standard Modern Slavery clauses in its contracts to improve the identification and management of Modern Slavery risks. This includes the provision of a Modern Slavery Risk Management Plan for high-risk engagements.

Case study: Furniture

In 2025, the University tested the iPro modern slavery assessment and reporting tool on furniture suppliers. While the assessment did not find any high-risk issues, the trial reinforced the inherent complexity and global nature of furniture supply chains.

Furniture is made from timber, metals and textiles that come from many different countries. Some of these countries have known problems with child labour, forced labour or illegal logging, especially during raw material extraction and processing.

The approach to making furniture also creates risks. Elements of production can occur in small workshops, subcontracted factories or home-based settings where regulatory oversight is limited. These environments may increase vulnerability to exploitative practices, including forced labour, servitude, misleading recruitment and exploitation of migrant workers.

Although no high-risk suppliers were identified in 2025, the University recognises that structural and geographic risk factors remain inherent in furniture supply chains. These insights will continue to inform targeted due diligence, monitoring, and risk management strategies within this procurement category.

Case study: Research and medical consumables, PPE and rubber gloves

During the annual bulk buy of research and medical consumables valued at approximately $2 million, the University worked with suppliers to include high-risk clauses in purchase order terms for the first time. The University used the creation of an Essential Laboratory Equipment panel to uplift the modern slavery clauses and signal a heightened focus on this category. High-risk modern slavery clauses are now included as standard in larger research equipment purchase agreements.

Research and medical consumables, including personal protective equipment (PPE) and rubber gloves, remain among the University's highest risk procurement categories. These supply chains are complex and multilayered, often involving multiple intermediaries and products moving across several countries before reaching the University. Many of these products are made in places where labour protections are weak, third-party labour agencies are common, and migrant or temporary workers are regularly engaged.

The University usually works with distributors or resellers, not the actual manufacturers. This makes it hard to see what is happening further down the supply chain, including how workers are recruited, whether subcontracting is used, and what working and living conditions look like beyond Tier 1. Because of this limited visibility, there is a higher chance of forced labour occurring in the raw material and component production stages.

In 2025, media reporting highlighted modern slavery concerns at a major rubber glove manufacturer. Its products were listed in the University supplier catalogues. Reported issues included recruitment fees, holding workers' documents, compulsory overtime and harsh disciplinary practices. These reports underscore the potential for purchasing decisions to be indirectly linked to risks in sub-tier factories, where independent verification and oversight can be difficult to obtain.

In response to these sector-wide risks, a dedicated Australian Universities Procurement Network (AUPN) high-risk management project has been set up to focus on research and medical consumables and related PPE.

Controlled entities

The University's Risk and Assurance team reviewed reporting and risk assessment requirements for entities with offshore operations to support the inclusion of modern slavery risks in entity-level risk registers. Controlled entities received a dedicated modern slavery briefing as part of the biannual entity information sessions, with focus on current supply chain risks and relevant case studies. The annual modern slavery survey identified no high-level risks.

The University engaged with individual entities, as required, to provide targeted guidance and support, particularly for those with overseas operations.

Sector collaboration

Australian Universities Procurement Network (AUPN)

The University is an active member of the AUPN Anti-Modern Slavery Working Group. This sector-based initiative supports enhanced human rights transparency across university supply chains, reduces duplication of effort and costs across institutions, facilitates collaboration on shared risks, and strengthens compliance with modern slavery reporting obligations.

2025 key initiatives and highlights

- **Engagement and knowledge sharing**
  The Working Group hosted eight forums in 2025, featuring presentations and interactive discussions with suppliers, university representatives, industry associations and modern slavery organisations. Key topics included data and monitoring, supplier risk and engagement, tools and guidance, and international student risk.
- **Collaborative data analysis**
  Participating institutions continued joint efforts to collect and analyse supplier data, improving visibility of supply chain risks and enabling shared learning opportunities.
- **Supplier remediation pilot**
  A pilot involving five suppliers was launched to explore a collaborative approach to remediation planning, supporting consistent and constructive responses to identified risks across participating institutions.

Case study: IT Hardware category of spend

In response to program members prioritising IT hardware risk in 2025, the Australasian Universities Procurement Network (AUPN) launched the Electronics Watch pilot program. The initiative supports a collaborative approach to mitigating modern slavery risks in ICT supply chains through a formal partnership with the independent monitoring organisation Electronics Watch.

The program leverages independent, worker-driven monitoring to improve visibility across complex, multi-tier electronics supply chains and strengthen due diligence capabilities. During the pilot, 30 supply chain cases were identified relating to a major electronics supplier across six countries: China, Democratic Republic of Congo, India, Malaysia, Taiwan and Thailand.

The ICT sector continues to present significant challenges in further mitigating modern slavery risks, particularly in relation to the use of metals in the production of computer chips. Given the complexity of ICT supply chains and increasing global focus on this sector, the University will prioritise cohort-based salient risks in 2026 as part of its evolving risk management approach.

2026 actions

Operations

Students

- Job rights and scams awareness content will be more prominently featured on the Careers Online site, the University's central job board, and amplified through coordinated campaigns via a recently implemented Employability Hub.
- High-risk modern slavery clauses will be progressively incorporated into Education Agent Agreements as they are renewed. This will be supported by the rollout of a tailored Modern Slavery Risk Management template and guidance for agents.

Research

- RIC will continue refining its approach to managing modern slavery risks in research activities.
- Development of a partnership-level risk assessment tool will progress, designed to evaluate partner suppliers, sector exposure and research activity risks. Scoping was undertaken in 2025, with implementation planned for 2026.

Investments

- JANA will update its ESG assessment questionnaire for external investment managers to enhance coverage of modern slavery risks.
- JANA will continue reviewing data provider tools that assess modern slavery risks within supply chains of listed companies, identifying actual or potential adverse human rights impacts.

Supply chain

The University will prioritise mitigation of cohort-based salient risks across key areas:

- Research consumables
  A dedicated AUPN high-risk management project will address identified risks in this category during 2026. Meanwhile, the University will build on the Education Agent approach to explore similar templates and support mechanisms for suppliers in this category.
- Continue to improve systems, tools and processes to identify risk with continued roll out of iPro and sector collaboration.

Controlled entities

The University will further strengthen modern slavery risk management across controlled entities by:

- Ensuring modern slavery risks are integrated into all entity-level risk registers.
- Providing role-specific procurement training, focusing on international operations, and refining tools for entities to assess supplier risk.
- Assisting entities in incorporating modern slavery concerns into their existing grievance mechanisms, particularly for entities with international operations.

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