



THE UNIVERSITY
of ADELAIDE

2025

Modern Slavery Act Statement



GROUP
OF EIGHT
AUSTRALIA

make
history.

Introduction

The University of Adelaide (ABN 61 249 878 937) (**the University**) is committed to protecting and respecting human rights and to taking steps to eliminate all forms of modern slavery.

Understanding our responsibility in this area, the University is working in accordance with the principles set out in the Modern Slavery Act 2018 (Cth) (the **Modern Slavery Act**). This Statement reflects the University's commitment and those of its controlled entities under Part 2 of the Modern Slavery Act during the University's 2025 financial year (1 January to 31 December 2025).

The University welcomes the opportunity to provide this annual Statement reflecting on the initiatives and the measures taken to identify, assess and act on these modern slavery risks.

A. About the University

The University is constituted by the [University of Adelaide Act 1971](#) (SA) for the purpose of:

The advancement of learning and knowledge, including the provision of university education.

Founded in 1874, the University of Adelaide is one of Australia's oldest universities and a member of Australia's Group of Eight research-intensive universities. Ranked among the world's top 100 universities¹; it is globally recognised as a leading research university.

The University is a diverse institution comprising students, scholars, and professional staff drawn from around the world. The student body consists of more than 30,000 students from over 100 countries. Students, along with over 3,900 members of staff, learn, teach and conduct research across the University's four campuses (three located in and around Adelaide, at North Terrace, Waite, and Roseworthy, and one in Melbourne).

As part of Australia's world-leading higher education sector, the University acknowledges the global challenges of sustainability and globalisation. It is committed to respecting human rights and reducing the risks of modern slavery in its operations and supply chains.

On July 1, 2023, the University of Adelaide and the University of South Australia began their historic integration, creating the new Adelaide University. Under the Adelaide University Act 2023, in March 2024, this integration aims to redefine higher education in South Australia and globally by leveraging the collective heritage and pursuing forward-thinking strategies. Adelaide University commenced operations in January 2026, the University's existing initiatives related to the Modern Slavery Act are available for adoption by Adelaide University, creating potential transitional risks that the University is aware of and managing. Any costs incurred by the University and activities undertaken through the integration process will be included in the University's modern slavery risk analyses and reporting.

B. The University's structure, operations and supply chains

Structure

Council is the principal governing body of the University and is chaired by the Chancellor, the Honourable Catherine Branson AC SC. The Vice-Chancellor and President, Professor Peter Høj AC FTSE FNAI (US), appointed by the Council, oversees and manages the University's academic standards,

¹ As measured by the best-known world university ranking methodologies available – US News Best Global Universities Rankings and QS World University Rankings. For more information visit <https://www.adelaide.edu.au/about/world-rankings>

management and administration. The Academic Board is responsible for overseeing the University's academic standards.

In 2025, the University was organised into three academic faculties and six administrative divisions:

- Faculty of Arts, Business, Law & Economics
- Faculty of Health and Medical Sciences
- Faculty of Sciences, Engineering and Technology
- Division of Academic and Student Engagement
- Division of External Engagement
- Division of Research and Innovation
- Division of University Integration
- Division of University Operations
- Division of the Vice-Chancellor and President

The University is a research-intensive institution that delivers excellence in research across a wide range of fields through its eight research institutes and approximately 50 research centres.

As a leading research and teaching institution, the University enjoys broad and successful relationships with government, industry, communities, strategic suppliers and research partners.

The University has established five controlled entities to support its core and strategic purposes. During the reporting period, three of the controlled entities were actively operating:

- Roseworthy Campus Farm Pty Ltd, ABN 56 007 936 834
- National Wine Centre Pty Ltd, ABN 75 117 597 592
- Innovation and Commercial Partners Pty Ltd, ABN 55 008 027 085
- Adelaide Unicare Pty Ltd (non-operating), ABN 13 056 443 059
- ACN 008 123 466 Pty Ltd (non-operating), ABN 31 798 859 716

Each operating entity is subject to governance, monitoring and reporting requirements directed and reviewed by various Standing Committees of Council and is required to regularly report directly to one of the University's assigned liaison officers (Deputy Vice-Chancellor (Research) or Chief Operating Officer).

Operations

The University's core business is teaching (including higher education, pathway programs and professional and continuing education) and research. While most of this work is undertaken in Australia, some employees and postgraduate candidates travel for work or reside overseas for varying periods. The University's controlled entities operate in various South Australian locations.

Supply Chains

Supporting the University's teaching and research activities, and campus operations requires a diverse range of goods and services from a large and complex supply chain. The University purchases materials for core teaching services, construction and facilities management, office equipment including computers and phones, catering, travel, accommodation, laboratory supplies including consumables, pharmaceuticals, and scientific equipment, and many other goods and services.

In 2025, the University spent over \$577m on goods and services from over 6,000 suppliers across 245 categories.

C. The risks of modern slavery practices in the operations and supply chains of the University and its controlled entities

The Chief Financial Officer (CFO) is responsible for implementing controls to address operational risks in Finance (including Procurement Services) and for ensuring compliance with regulatory obligations and codes of practice. The obligations, codes of practice, and the University's response to them are set out here.

Risk Identification and Management

Under the leadership of the CFO, the University's Finance branch has developed a response to modern slavery risks, including the risks described in this statement. This response has been supported by the University's membership in the Australasian Universities Procurement Network (AUPN). AUPN members collaborate to identify key supply chain risks in the higher education sector and share information on effectively managing them. Further details about this collaboration are in the 'Actions taken to assess and address risks' section below.

The University's Risk Management Framework guides oversight of all risks, which are reported to the University's Council via the Risk Committee, a Standing Committee of Council.

Supply Chain Risk Assessment

The University recognises that modern slavery is a risk in the supply chains of all the goods and services it purchases. The relative risks for any goods or services the University purchases can only be determined by assessing factors such as product or service type and manufacturing or operating locations. The University recognises additional modern slavery risk factors in supply chains beyond geography and industry, such as subcontracting. In 2025, it continued to use the AUPN's data analysis and risk mapping process to understand these risks through the Proxima Group (previously known as ArcBlue) Modern Slavery Risk Rating assessment tool, implemented by the University and other AUPN members to assess supply chain risks for the sector and individual participating universities.

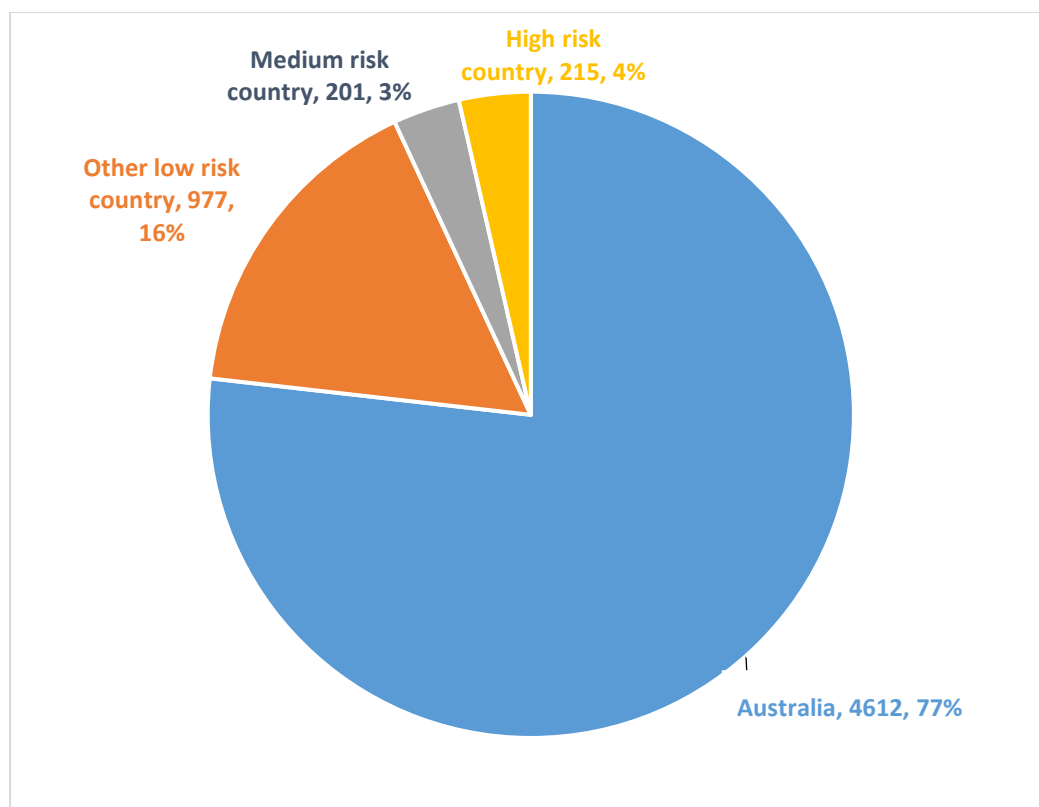
The University's classification of country and product risk factors for modern slavery was first developed in 2020 and refreshed in 2023. Updated data and information from a range of sources, including the Proxima Group Modern Slavery Risk rating methodology, were reviewed, and the University's risk criteria were updated accordingly. High risk categories have been identified based on the University's spend, country risk, and category risk, including commercial cleaning, IT accessories, construction, catering, and laboratory supplies.

In 2025, 21% of the University's spend was on high risk goods and services, 23% on medium risk, while 56% was on low risk categories.

Most suppliers (77%) were located in Australia, with 16% in low risk countries and only 4% in high risk countries. The University acknowledges global supply chains and anticipates that suppliers in low risk countries may have downstream supplier relationships with suppliers in high risk countries.

Adelaide University will continue to monitor worker locations and apply due diligence assessments, including compliance with the University's Supplier Code of Conduct and in accordance with the terms of University standard contracts. Adelaide University will continue to monitor the location of workers as a known risk indicator and, along with others in the AUPN, continue to apply due diligence assessments to its supply chains.

Figure 1: Number and proportion of University suppliers in 2025 by country risk level



Risk in Operations

The University has assessed the likelihood and consequences of modern slavery in core operations to be low. Given the nature of the University's workforce and operations and the robust legislative environment in which it operates, modern slavery risks are possible but not expected to arise routinely and can be monitored and controlled by a targeted management strategy.

The following sections describe in detail the basis for this assessment and the management measures that mitigate modern slavery risk.

Risk in the Management of Human Resources

The University's operations and staffing profile do not exhibit any characteristics that might indicate a higher risk of modern slavery. The University's workforce is highly skilled, and continuing, fixed-term, and casual staff are recruited using transparent, documented processes.

The University of Adelaide's continuing, fixed-term contract, and casual employees work under the University of Adelaide Enterprise Agreement 2023-2025, which has been approved by the Fair Work Commission.

The University diligently checks that all new employees have the right to work in Australia. Most employees are based in Australia; however, where work is undertaken overseas, University employees remain covered by Enterprise Agreement conditions.

In addition to the Enterprise Agreement, the University has a range of other policies, procedures, and supporting documents in place to help manage the risks of modern slavery in its operations:

- [Recruitment Policy and Procedure](#)
- [Behaviour and Conduct Policy](#)
- [Code of Conduct](#)
- [Public Interest Disclosure Policy](#)

The University's Integrity Unit receives and oversees reports of misconduct and inappropriate behaviour from University community members (including students, staff, titleholders, volunteers, visitors, and contractors). During the reporting year, the Integrity Unit received no reports relating to modern slavery.

Risk in Research Operations

The University's research operations are primarily service based. The scope of research services conducted by University staff may include developing prototypes and field-demonstrable products as a proof-of-concept stage in the application of knowledge to real world endeavours. However, the University is not a commercial producer or manufacturer of goods.

Most research services are undertaken by employees of the University, who are protected by the policies and procedures outlined above. Subcontractors are used when required, and these may be based either in Australia or overseas. When subcontractors are engaged, standard template agreements are used, and in the case of research funded by government sources, the terms of the University's agreement with its subcontractor will mirror those set out in the government funding agreement. Complex or unusual contracts are reviewed by the University's in-house legal counsel.

The University's research operations also include international research collaborations, in which academic research leaders create and foster collaborations with universities, companies, and other entities outside of Australia. The outcomes of these collaborations (including grants, academic papers, intellectual property, and student recruitment) benefit the University. These collaborations may be governed by formal agreements, but typical academic-to-academic collaborations are often informal. University staff are routinely required to complete a foreign engagement compliance review and report details of the scope and purpose of any international arrangements to the University.

Researchers associated with the University are expected to comply with the University's [Responsible Conduct of Research Policy and Procedure](#), which adopts the principles embodied in the Australian Code for the Responsible Conduct of Research 2018.

Risk in Teaching Operations

University teaching operations are also service based, with most teaching services delivered by continuing or casual employees who are protected by the policies and procedures outlined above. Contractors are used occasionally.

Most of the University's teaching operations are based in Australia; however, some are conducted overseas, through joint ventures with partner universities. Employees of the University who are located outside of Australia are still protected by the Enterprise Agreement and the suite of policies and procedures that apply to all University staff.

Spotlight: International Students and Workplace Exploitation

The University recognises that temporary work visa holders in Australia, including international student visa holders, are at higher risk of exploitative working conditions such as underpayment of wages². To support these students, the University provides targeted services and information as required under the Education Services for Overseas Students Act. This includes sharing information about working rights during the International Student Welcome for each study intake, in mandatory courses for new international students, and providing resources and links on its website³.

The University also includes information on working rights in international student newsletter editions coinciding with the two major intakes of the year (Semester 1 and Semester 2), as well as sharing relevant events and initiatives organised by external stakeholders via both the international and all-student newsletters. Additionally, the University partners with StudyAdelaide to share information and resources with current and prospective students on working rights in Australia⁴. Adelaide University is committed to ensuring a positive experience for international students in Australia and will continue to raise awareness of their rights and where to seek help if they encounter exploitative working conditions and/or modern slavery-like practices.

Risk in Controlled Entities

The University's operating controlled entities and the risks of modern slavery in their operations and supply chains are detailed below:

Roseworthy Campus Farm Pty Ltd

Roseworthy Campus Farm manages the University's cropping, sheep, and cattle operations, crucial for teaching and research. It operates commercially, with income supporting agricultural and livestock research. Employees are covered by professional awards, with contract labour hired during peak times. The supply chain includes animal care supplies, facilities management, and IT equipment, with some goods sourced from the University's preferred suppliers.

National Wine Centre Pty Ltd

The National Wine Centre of Australia is one of the country's most awarded venues for conferences, meetings and events, showcasing the Australian wine industry. Employees are covered under the

² Walk Free Foundation 2025, Modern Slavery Index Country Profile: Australia, <https://www.walkfree.org/global-slavery-index/country-studies/australia/>

³ <https://international.adelaide.edu.au/international-student-support/working-while-studying/>

⁴ <https://studyadelaide.com/work/work-rights>

Hospitality Industry (General) Award 2020, with payroll compliance audited annually. Temporary staff may be hired through an Australian labour hire agency. The supply chain includes food, beverages, facilities management, and IT equipment, with some goods and services sourced from the University's preferred suppliers.

Innovation and Commercial Partners Pty Ltd

Innovation and Commercial Partners Pty Ltd (ICP) is a wholly owned subsidiary of the University, established to commercialise and develop the University's intellectual property.

ICP has no employees and, as it does not conduct purchasing activity, has no supply chain.

D. Actions taken by the University to assess and address risks

Sector Due Diligence Activities

The University of Adelaide is a member of the AUPN, the peak body for strategic procurement in the higher education sector in Australia and New Zealand. The AUPN comprises 42 member institutions from Australia and New Zealand. The University recognises that more meaningful and effective change is achievable through collaboration with other higher education institutions, and, through its representation on the AUPN University Anti-slavery Program, the University has played an active role in shaping this sector response.

During 2025, the AUPN's efforts were focussed on risk software refresh and implementation, capability uplift, engaging additional support through third party program resources, collaboration on issues and risks, and engagement across the sector and with external groups and experts. This included continuing to participate in discussions with other universities and the Australian Red Cross – Student Work Right Hub regarding the workplace exploitation risks international students face, to review and redesign resources and further determine preferred internal dissemination channels.

Since the last reporting year, the University and other AUPN members implemented the Proxima Group Modern Slavery Risk Rating tool to assess supply chain risks for the sector and individual participating universities; this tool has refined and improved the university supply chain mapping and risk analysis solution.

During 2024, the AUPN, on behalf of the University (and all sector members), issued detailed Supplier Assessment Questionnaires (SAQ) to key Medical Equipment and Laboratory Consumables suppliers. This program of activities has provided deeper due diligence insights during the reporting period. A pilot process was initiated with a small sample of selected suppliers in 2025. Further details about this activity are set out in 'The University's assessment of the effectiveness of its actions' section.

The AUPN also began a detailed review into modern slavery risks in the medical gloves product category. This process builds on a 2021 review and will be finalised in 2026.

In 2025, the University, with 18 other AUPN members, also participated in the Migrant Justice Institute (MJI) National Temporary Migrant Survey. This survey allowed individual universities to collect data on their own international students' experiences of modern slavery indicators; for further details, refer to 'The University's assessment of the effectiveness of its actions' section.

A total of 97% of the University's purchase data from 2025 is analysed through the Proxima Group Modern Slavery Risk Rating Tool (purchases made on corporate credit cards, which represent approximately 3% of the University's spend in 2025, are not included due to data limitations).

Supplier Due Diligence Activities

The University put in place several due diligence processes during 2019-20, in preparation for the University's first reporting year under the Modern Slavery Act. The University has continued to build on this foundation with the following activities conducted during the 2025 reporting year:

- University contracts relating to the purchase of goods and/or services include standard contract clauses which require suppliers to:
 - Comply with the intent and the requirements of the Modern Slavery Act;
 - Include similar modern slavery clauses in contracts with their own suppliers and subcontractors;
 - Notify the University as soon as the supplier becomes aware of any actual or suspected slavery in a supply chain connected to the contracted goods and/or services; and
 - Remedy any identified instances of modern slavery within a reasonable timeframe.
- The University's Supplier Code of Conduct ("the Code") conveys its public commitment to undertaking procurement activities in an environmentally, socially, ethically, and economically responsible manner. During the 2025 reporting year, the University's standard contracts for the purchase of goods and/or services included a clause requiring the supplier to comply with the Code. In instances where an alternate contract was used (for example, supplier's own contracts), suppliers were requested to sign the Code and confirm they agree to it and understand their expectations as a supplier to the University.
- When undertaking formal approaches to market in 2025, the University asked suppliers to respond to questions relating to their reporting status under the Modern Slavery Act; their policies, education, and training practices relating to modern slavery; and the steps they have taken to ensure the risks of modern slavery have been identified and addressed in their supply chains and operations. Supplier responses to these questions helped the University identify and manage risk. For high risk modern slavery procurement categories, the University may additionally engage with third party providers of Environmental, Social, and Governance (ESG) research, ratings, and analytics to support the identification, assessment and management of modern slavery related risks, including those related to sustainability, human rights, and ethical supply chains.

Training and Awareness

Strategic Procurement and Purchasing are centralised activities at the University. In 2025, all new staff in the Strategic Procurement and Purchasing teams received training in modern slavery, ensuring these key staff are aware of the University's proactive approach to addressing modern slavery risks and meeting its obligations under the Modern Slavery Act. Targeted outreach activities occurred when University staff outside of the Strategic Procurement team were involved in evaluating high risk purchases.

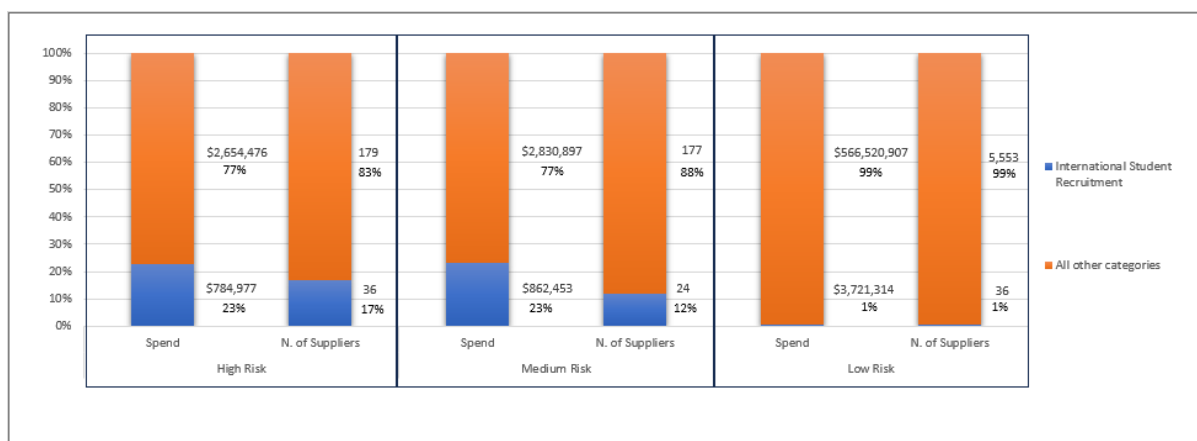
During the reporting year, the University published information on its intranet to promote general awareness of modern slavery.

Spotlight: International Student Recruitment

The University engages third-party international student recruitment agents to connect it with potential students worldwide. These organisations provide detailed information and guidance to potential students, match students to universities that best meet their needs, and assist students with university and visa application processes and documentation. The University pays agents' commissions when students successfully enrol in and complete a portion of a course of study at the University.

International student recruitment agents may be based in Australia but are also commonly based (or have staff located) overseas in any market where potential students may be found. At the University, this means agents appear as suppliers in countries which are classified as high and medium risk of modern slavery. As shown in Figure 2, these suppliers represent a significant proportion of spend and suppliers in high and medium-risk countries, including 23% of all University spending in medium-risk countries in 2025. This significant representation in countries at higher risk of modern slavery has prompted a deep dive into the sector and a close review of how the risk of modern slavery can be managed in this supplier category.

Figure 2: International student recruitment as a proportion of spend and supplier count by country risk profile, 2025



In working with international student recruitment agents, the University complies with the Education Services for Overseas Students Act 2000 (ESOS Act) and the National Code of Practice for Providers of Education and Training to Overseas Students 2018 (National Code).

The University does not work with uncontracted agents or engage with agents who make unsolicited approaches to the University. Agents are typically selected to work with the University after being recommended by similar institutions, and only after completing a comprehensive due diligence process. The University's agent contracts contain strict terms for agent conduct, set out the University's requirements for performance review and monitoring, and contain terms describing the corrective actions the University may take if the agent, an employee, or a subcontractor does not meet their responsibilities under either the University's contract or the National Code.

The University's agent contracts allow the termination of the agreements immediately if prohibited conduct or failure to take corrective action occurs. Based on the information available to the

University, no instances of prohibited conduct relating to modern slavery were identified during the reporting period.

The University is a member of the Australian Universities International Directors Forum, a sector-wide platform for facilitating cooperation and cohesion in university international engagement activities⁵. This network allows the University to contribute to and benefit from information and resource sharing across the higher education sector, including sharing information relating to agent conduct and reputation.

The University acknowledges that there are risks presented in outsourcing student recruitment activities to third party providers, particularly those in countries with weak governance and regulatory environments, and that there is particular risk in business models that include subcontracting. Since 2024, the University has taken additional steps to help manage these risks, including introducing clauses specific to modern slavery in Adelaide University's agent contracts and maintaining an Education Agent Engagement Policy.

E. The University's assessment of the effectiveness of its actions

Sector Risk Assessment Approach

During 2024, as part of our ongoing commitment to addressing modern slavery risks across the higher education sector, AUPN evaluated high spend value categories across the sector and nominated the Medical Equipment and Laboratory Consumables category as the area of focus for selected suppliers to complete a Self Assessment Questionnaire (SAQ). The AUPN engaged with these selected suppliers to complete the SAQ. This initiative enabled universities to gain insights into their business processes and identify potential risks, with 47 of 72 suppliers completing the questionnaire.

In 2025, AUPN conducted further engagements with five suppliers representing the highest levels of risk within the medical and laboratory consumables category. These engagements were undertaken to pilot the implementation of Supplier Remediation Plans. Of the five suppliers, one was assessed by the University as high risk and selected for closer collaboration as part of this process. No incidents were self-reported.

Key findings from the pilot highlighted suppliers' limited understanding of modern slavery, alongside a strong willingness to collaborate with universities to improve transparency and reduce risk. Suppliers also expressed a need for clearer guidance on practical actions they could take. In response, the AUPN University Anti-slavery Program developed a concise, user-friendly Supplier Anti-slavery Toolkit outlining six recommended actions to support suppliers in strengthening their awareness of modern slavery and managing related risks. The University has access to this toolkit and may distribute it to suppliers as required.

⁵ <https://www.auidf.org/>

Addressing International Student Risk

As part of the University's ongoing commitment to address potential international student exploitation risk, the University promoted the 2024 National Temporary Migrant Survey launched by MJI nationally. The survey also provided migrants with important information about their rights and work referrals to support services.

317 students who participated in the survey identified the University of Adelaide as their current education provider. Over the next twelve months, MJI intends to release several public reports and briefs on the survey findings, which will guide the AUPN University Anti-slavery Program in developing an evidence-based, sector-wide response throughout 2026.

In addition, during the reporting year, the AUPN facilitated an International Student Risk Roundtable, a major sector collaboration initiative that brought together 11 universities from multiple states and leading stakeholders, including the MJI, Australian Red Cross, Fair Futures, the Australian Federal Police, and the NSW Anti-Slavery Commissioner. These efforts have deepened shared understanding and reinforced a sector-wide commitment to student protection.

In 2024, six universities (representing AUPN) worked with the Australian Red Cross to adapt the Work Right Hub (WRH) materials to help international students identify signs of exploitation and understand the avenues for support. The resources were published on the WRH digital platform and formally launched as a sector in June 2025, with an online one-hour free session promoting the new Work Right Hub resources and featuring experts on steps to take when seeking advice or support.

In addition, the Work Right Hub has redesigned its landing page and added a new section for seeking support by job type. It has been designed to strengthen workers' awareness of safe and fair work, and of where to go for advice and support. Additional promotional materials were provided to participating universities for internal use and promotion.

F. Consultation with Controlled Entities

The University's controlled entities currently operating were consulted during the development of this report. The supplier data from the National Wine Centre has been combined with the University's data for the 2025 risk identification and analysis activities, enabling the University to undertake a risk assessment for 109 unique suppliers not previously captured.

G. Other information

Next Steps

Having identified systems and processes that have collectively supported the University's approach to managing modern slavery risks, the following activities are available for Adelaide University to adopt:

- Ongoing requirements for contracts with suppliers to include clauses specific to modern slavery, for suppliers to conform with the University's Supplier Code of Conduct, and for data relating to modern slavery from suppliers participating in market activities to be provided;
- Using the Proxima Group tool, or alternate tool/s identified by the higher education sector through the AUPN, to monitor risk and identify any instances of modern slavery in our supply chain, and conducting detailed assessments of high risk suppliers;
- Working to implement contracts for high risk goods and service categories not currently under contract;
- Continuing to improve awareness of the risk of modern slavery and responsibilities under the Modern Slavery Act within the central Procurement Services team and across the wider institution;
- Working to include the supply chains of all operating controlled entities into the University's ongoing risk identification and analysis process;
- Continuing to share best practices in addressing modern slavery risks and human rights as they relate to the higher education sector;
- Continuing to gain insights from academics employed in Australian universities working in research fields related to modern slavery and human rights;
- Continuing to look for best practices in addressing modern slavery risk across industries, including by engaging with third party organisations established to identify and mitigate modern slavery risks; and
- Using the upcoming outcomes from the Migrant Justice Institute National Temporary Migrant Survey to identify current risks and required support needs for international students.

Approval

This statement was approved by the University of Adelaide Council in its role as principal governing body on 30 March 2026.



.....
Professor John Williams AM

Acting Vice-Chancellor,
The University of Adelaide

30/3/26
.....
Date

Contents

Mandatory criteria	Page number/s
Identify the reporting entity A. About the University	1
Describe the reporting entity’s structure, operations, and supply chains B. The University’s structure, operations and supply chains	1 - 2
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls C. The risks of modern slavery practices in the operations and supply chains of the University and its controlled entities	3 – 7
Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes D. Actions taken by the University to assess and address risks	7 – 10
Describe how the reporting entity assesses the effectiveness of these actions E. The University’s assessment of the effectiveness of its actions	10 - 11
Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls F. Consultation with Controlled Entities	11
Any other information that the reporting entity considers relevant G. Other information	12