



MACQUARIE
University
SYDNEY · AUSTRALIA



Modern Slavery Statement

JANUARY 2025 – DECEMBER 2025

*A dandelion reflects resilience
in the face of adversity.*

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ACKNOWLEDGEMENT OF COUNTRY

We acknowledge the Traditional Custodians of the land on which Macquarie University is situated, the Wallumattagal people of the Dharug Nation, whose cultures and customs have nurtured, and continue to nurture, this land since time immemorial. We also acknowledge the Elders, past and present, and pay our respects to them.

We further honour and pay our respects to the spirits of this land and its waterways. We humbly ask that all members of the Macquarie University community are granted the capacity to wingaru (think), to learn and to walk safely upon this ngurra (land). The University continues to develop respectful and reciprocal relationships with all First Nations people in Australia and throughout the world.



Introduction

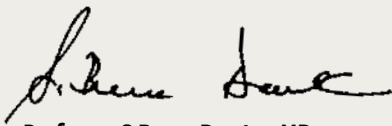
Macquarie University's commitment to addressing modern slavery is embedded across the University's operations, partnerships and supply chains. In 2025, this commitment was strengthened through a collaborative, research-informed approach that draws on the expertise of academics, research students and professional staff. Their insights continue to shape practical tools, strengthen training and enhance our ability to identify, assess and manage risk in meaningful ways.

Since our first statement in 2020, our approach has matured each year – from an initial response to the *Modern Slavery Act*, to established and enhanced practices, and then to more mature, embedded approaches through 2025. Over the years we have continued that progression by deliberately shifting from transparency-led reporting to more tangible, targeted action – further strengthening governance, improving risk visibility and prioritising interventions where the risk of harm is higher.

This work reflects a collective effort across the University community. Staff, students and partners have contributed to awareness raising, policy development and risk mitigation initiatives, reinforcing a shared understanding that addressing modern slavery requires sustained action, not just compliance. By integrating research into supply chain analysis and capability building activities, we continue to advance approaches that are evidence-based, practical and focused on real-world impact.

We also recognise the importance of strong and transparent relationships with our suppliers, industry partners and collaborators. These relationships are central to ensuring our actions are informed, proportionate and effective. Working together, we seek to respond to emerging risks, strengthen accountability and continuously improve our practices.

While acknowledging the progress made to date, Macquarie University remains focused on the work ahead. Our objective is clear: to ensure that our efforts extend beyond reporting to address modern slavery risks through robust oversight, evidence-based decision-making and proactive measures that support prevention, mitigation and continuous improvement across our operations and supply chains.



Professor S Bruce Downton MD
VICE-CHANCELLOR AND PRESIDENT

11 June 2026

Date

Criterion 1: The reporting entity

MACQUARIE UNIVERSITY GROUP AT A GLANCE

In accordance with the *Modern Slavery Act 2018* (Cth), this statement outlines the actions Macquarie University has taken during 2025 to strengthen its approach to identifying, assessing and addressing modern slavery risks across its operations and supply chains.

Macquarie University (ABN 90 952 801 237) was formally established in 1964 as a bold experiment in higher education. Built to break from traditions and work in tandem with industry, we strive for the extraordinary by challenging convention and embracing different views.

Led by our academic and professional staff, we continue our pioneering approach to enhancing graduate employability through personalised degrees and degrees co-designed with industry.

In recognition of the Aboriginal country on which Macquarie University is situated, our main campus is known as the Wallumattagal Campus, situated on 126 hectares of parkland in the Connect Macquarie Park Innovation District.

The University's principal functions are guided by the *Macquarie University Act 1989* (NSW). Our four faculties – Faculty of Arts; Faculty of Medicine, Health and Human Sciences; Faculty of Science and Engineering; and Macquarie Business School – offer an extensive range of undergraduate and postgraduate degrees, and research programs. We also operate a private, not-for-profit teaching hospital situated on campus, along with several controlled entities. In this statement, 'the Group' refers to faculties, portfolios and entities of the University.

PRINCIPAL FUNCTIONS

The principal functions of Macquarie University are those set out in the *Macquarie University Act 1989* (NSW) (the Act). In 2025, there were no changes to these functions:

- the provision of facilities for education and research of university standard
- the encouragement of the dissemination, advancement, development and application of knowledge informed by free inquiry
- the provision of courses of study or instruction across a range of fields, and the carrying out of research, to meet the needs of the community
- the participation in public discourse
- the conferring of degrees, including those of Bachelor, Master and Doctor, and the awarding of diplomas, certificates and other awards
- the provision of teaching and learning that engages with advanced knowledge and inquiry
- the development of governance, procedural rules, admission policies, financial arrangements and quality assurance processes that are underpinned by the values and goals referred to in the functions set out in this subsection, and that are sufficient to ensure the integrity of the University's academic program.

ACCESS MACQUARIE LTD (ACCESSMQ)

AccessMQ is a not-for-profit public company limited by guarantee and wholly owned by the University. It is an equity-holding and equity-trading vehicle for the University's interests in research-related startup and spin-out companies. This includes a promising pipeline of companies initiated by enterprising University research teams, with Access Macquarie to hold an equity position in each.

MACQUARIE UNIVERSITY SERVICES LTD

Macquarie University Services is a not-for-profit public company limited by guarantee and wholly owned by the University. Its principal activity is to operate the hospitality facilities that support the mission of the University.

MQ HEALTH PTY LTD

MQ Health is a not-for-profit company limited by shares and wholly owned by the University. Its objectives are to provide clinical services that are patient-centred, high-quality, evidence-based and efficient. MQ Health provides clinical placements for medical and allied health students, as well as junior doctors undergoing their postgraduate clinical training. It supports medical research with Macquarie University and other high-quality affiliated medical and research institutions.

MACQUARIE UNIVERSITY HONG KONG FOUNDATION LTD

Macquarie University Hong Kong Foundation is a not-for-profit public company limited by guarantee and wholly owned by the University. Its principal activities are to advance, promote and develop higher education. It focuses on the advancement of education and exchange of knowledge between the University, Hong Kong and China – and provides mobility scholarships and support for students, researchers and academics.

U@MQ LTD

U@MQ is a not-for-profit public company limited by guarantee and wholly owned by the University. Its objective is to provide facilities for members of the University community, including staff and students, which complement and support the University's academic activities. Services include sporting and recreational facilities; accommodation, food, beverage and retail services; and the provision of childcare.

The University's vision is to be a transformative force recognised for high-quality education

Performance overview

SUPPORTING STRATEGIC GROWTH AND SERVICE DELIVERY

\$4318 million
total assets

\$42 million
net result

\$139 million
in scholarships and grants
to students

1785
graduate research
students

\$191 million
in research income
and block grants

662
Macquarie University
College students

\$1438 million
revenue

34,252
domestic students

\$180 million
cash flows provided
by operating activities

12,206
international students
from 117 countries

Criterion 2: Structure, operations and supply chain

AS IT RELATES TO MODERN SLAVERY OBLIGATIONS

Macquarie University operates under the *Macquarie University Act 1989* (NSW). The Act, under Part 2 of Section 6(1), states: “The object of the University is the promotion, within the limits of the University’s resources, of scholarship, research, free inquiry, the interaction of research and teaching, and academic excellence.”

The University Council is the governing body of the University. According to Part 4 of the Act, the Council “may act in all matters concerning the University in such manner as appears to the Council to be best calculated to promote the object and interests of the University.” The Council is empowered to establish by-laws and rules governing the management of the University.

The Act also establishes the Academic Senate, which is the principal academic body of the University, and designates the Vice-Chancellor as the principal executive officer. The Office of the General Counsel maintains standard agreements and templates for common transactions. It also reviews and provides advice on deviations from standard agreements and on non-standard contracts, instruments and dealings.

The Office of General Counsel oversees the University’s compliance management framework and **Policy Central**, the online authoritative source for rules, policies, procedures, guidelines and related documents. Compliance is a shared responsibility across the Group to ensure that operational activities align with relevant laws and regulations.

Targeted consultation is undertaken to determine policy relevance across the University, its entities and various portfolios.

Unless otherwise stated, the data in this report covers the University Group. Table 1 shows the governance arrangements established to identify and address modern slavery risks.

Table 1: Macquarie’s governance arrangements to identify and address modern slavery risks

Macquarie University Council	Has reserved powers to approve and monitor systems of control and accountability for the University and its controlled entities
Audit and Risk Committee	Determines whether management has appropriately considered legal and compliance risks, and reviews the effectiveness of the system for monitoring compliance with applicable laws and regulations, and associated government policies
Vice-Chancellor and President	Has overall responsibility for academic, research, administrative, financial and development strategies at the University
Vice-President, Finance and Resources	Sponsors the development of a framework that identifies and addresses modern slavery risks across the University
Strategic Procurement	Identifies and manages risks and vulnerabilities in the University’s supply chains, and ensures that the University’s procurement processes support and encourage positive change in the conduct of suppliers and market practices
Office of the General Counsel	Provides advice on the University’s modern slavery reporting and compliance obligations under the <i>Modern Slavery Act 2018</i> – including developing and approving legal templates, contracts and agreements – and oversees the University’s compliance management framework, including the Modern Slavery Policy . Monitors, as part of that oversight, an inbox, the details of which are provided to other parties and contracts to notify of any alleged or suspected exploitative conduct. Oversees, guides and coordinates the development, review and approval of the University’s policies, including the Modern Slavery Policy

By fostering knowledge and building strong partnerships, we empower communities to prevent and address modern slavery risks.

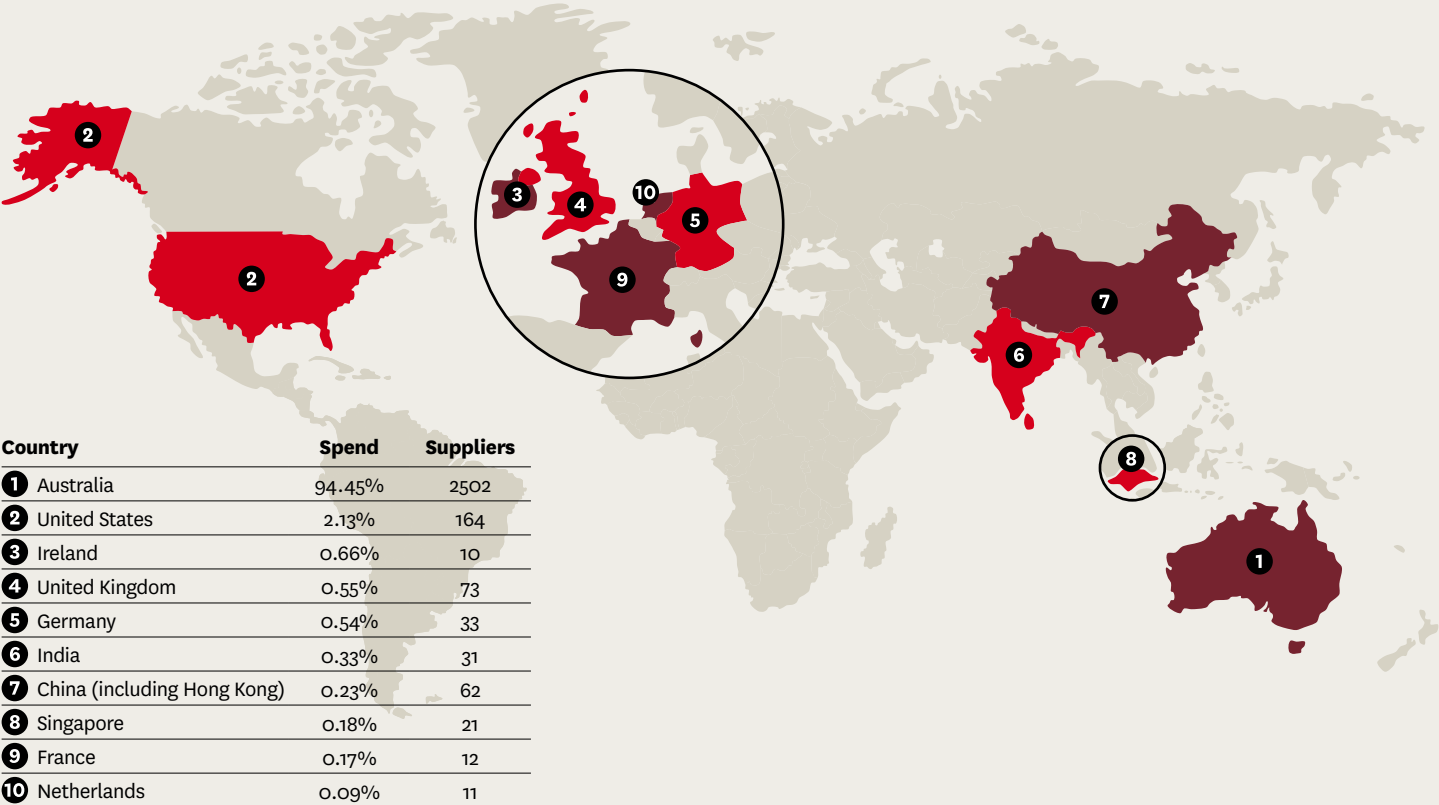
Figure 1: Supplier portfolio split



Figure 2: Procurement spend by Australasian Universities Procurement Network (AUPN) Category



Figure 3: Procurement spend by country (2025)



Criterion 3: Risks of modern slavery practices in operations and supply chains

Macquarie University recognises that modern slavery risks may arise where the University has the potential to cause, contribute to, or be directly linked to modern slavery through its operations and supply chains. These risks are most likely to occur in areas involving complex or global supply chains, outsourced and subcontracted services, international engagement, and activities involving vulnerable worker or student cohorts.

Consistent with the NSW Anti-slavery Commissioner's Guidance on Reasonable Steps to Manage Modern Slavery Risks in Operations and Supply-Chains, the University applies a risk-based approach to identifying and prioritising modern slavery risks. This approach focuses on where the severity of harm, scale of impact and difficulty of remediation are likely to be greatest, enabling the University to move beyond high-level risk identification to targeted action in higher risk activities, suppliers and relationships.

In 2025, the University continued its progression from transparency-led reporting towards more tangible and embedded action by strengthening its capability to identify and manage modern slavery risks. This included the integration of digital and data driven tools into risk assessment and supplier engagement processes, improving visibility of supply chain risks, enabling prioritisation of higher risk categories, and supporting earlier identification of emerging risks. These capabilities allow the University to take proportionate, timely and practical steps to prevent, mitigate and address potential harm.

Collaboration and shared learning remain central to this approach. Through participation in sector-wide initiatives led by the AUPN, and ongoing engagement with guidance and resources developed by the NSW Anti-slavery Commissioner, the University continues to strengthen the consistency, effectiveness and maturity of its modern slavery risk management practices across operations and supply chains.

*Macquarie University
is a university of
service, engagement
and empowerment.*

Criterion 4: Actions taken to address risks, due diligence and remediation process

Macquarie University applies a risk-based approach to preventing and addressing modern slavery in its operations and supply chains. This approach is embedded within the University's Risk Management Policy, which is aligned to AS ISO 31000:2018, and supports the systematic identification, assessment and management of ethical and human rights risks, including modern slavery, across University activities.

Modern slavery risks are addressed through defined governance structures, clear accountabilities and documented procedures that support consistent decision-making and appropriate escalation. Due diligence processes are applied proportionately based on the level of risk and are embedded across procurement, employment, partnerships, research activities and other relevant functions. Where risks are identified, controls are implemented to prevent or mitigate harm, and matters are escalated through established governance pathways.

The University maintains accessible reporting and support mechanisms to enable staff, students and third parties to raise concerns safely. Through its **Safety and Security online resources** and related support tools, the University promotes shared responsibility by providing clear pathways for reporting suspected unethical conduct, including potential modern slavery issues. These mechanisms support early identification, timely escalation and appropriate response.

Where allegations or indicators of modern slavery are identified, the University undertakes assessment and response actions consistent with its policies and legal obligations. This may include investigation, engagement with relevant internal or external stakeholders, remediation actions where appropriate, and review of controls to prevent recurrence. Through these measures, modern slavery risk management is integrated into the University's broader governance and risk framework and subject to ongoing oversight and continuous improvement.

*At our core, we stand for
a future free from modern
slavery, shaped by what
we teach, how we operate,
and who we empower.*

ADDRESSING STUDENT-RELATED RISKS

RISK MITIGATION AND STUDENT SUPPORT CONTROLS

MODERN SLAVERY RISK CONTEXT

Students can face heightened vulnerability to exploitation and modern slavery related harms, particularly where financial pressure, insecure housing, wellbeing challenges or limited awareness of rights and support pathways intersect. Macquarie University's approach is grounded in safeguarding student wellbeing and ensuring that students are supported, protected and able to seek help safely and confidently when concerns arise.

POLICY FRAMEWORK AND REPORTING PATHWAYS

Accessible and student-centred reporting mechanisms are in place to ensure concerns can be raised without fear of harm or disadvantage. Students may submit reports through the **Inappropriate and Unwanted Behaviour reporting system**, with the option to select 'Modern Slavery' as the report type. Where students are seeking wellbeing or practical support, **CARE forms** provide an alternative pathway, allowing students to identify relevant concerns – such as mental health, financial or welfare issues – and access tailored support, referrals and follow-up. These pathways are designed to prioritise student safety, enable early identification of risk, and ensure timely, confidential and appropriate responses.

RISK MITIGATION AND AWARENESS CONTROLS

Protective controls continue to be embedded across student-facing governance and engagement mechanisms. Modern slavery considerations are integrated into student group policies, event approval processes and risk assessment procedures, helping ensure potential risks are identified and addressed early.

Awareness is reinforced through digital platforms including iLearn, campus screens and student publications, supporting consistent messaging across the student lifecycle. Targeted training initiatives, such as the **Red Cross Work Right Hub** modules for student leaders, are monitored to strengthen understanding of workplace rights and exploitation risks. External partnerships with organisations including Red Cross and Anti Slavery Australia further support leadership capability and informed decision-making among student representatives.

STUDENT SAFEGUARDS AND WELLBEING SUPPORT

A comprehensive range of **wellbeing and support services** is available to protect students and respond where concerns arise. These include in-person support through the Thrive Hub, year-round wellbeing initiatives, and targeted assistance relating to housing, food security and personal safety. Students also have access to bulk-billed general practitioner services, free and confidential counselling, and interpreter support where required.

From 2026, the Study Without Stress (SWoS) program will further strengthen protective supports by equipping students with practical skills to manage stress associated with academic demands and broader life pressures.

COMMUNICATION AND ONGOING SAFEGUARDS

Clear, consistent communication supports early intervention and informed help seeking. Information on modern slavery, wellbeing and support services continues to be shared through the **Modern Slavery webpage**, onboarding materials, newsletters and digital signage. Engagement with training and awareness initiatives is monitored to inform continuous improvement, and additional safeguards are strengthened where gaps are identified.

Established policies – including the **Student Code of Conduct, Public Interest Disclosure Policy** and formal grievance and reporting systems – provide further protection. Proactive engagement with international students through tailored communications, welcome initiatives and participation in external forums, including the NSW Anti-slavery Commissioner's International Student Modern Slavery Risk Roundtable, helps ensure support is accessible to students who may face heightened vulnerability.

Through these integrated measures, Macquarie University prioritises student safety and wellbeing, moving beyond awareness-raising towards embedded, protective controls that support prevention, early intervention and meaningful action in addressing modern slavery risks.

STUDENT AND GRADUATE EMPLOYMENT

CAREER AND LEADERSHIP DEVELOPMENT

MODERN SLAVERY RISK CONTEXT

The University recognises that students seeking employment may be vulnerable to exploitation, particularly when entering the workforce for the first time or engaging in casual or part-time work. Risks may arise through limited awareness of workplace rights, reliance on third-party employers, or engagement in insecure work arrangements. Supporting students to understand their rights and access safe employment pathways is an important element of the University's approach to preventing modern slavery and related forms of harm.

To support this, Macquarie Student Employment offers a **range of resources** to help students secure and prepare for employment during their studies and after graduation. This includes access to AI-enabled tools, online learning materials and a jobs platform (CareerHub), alongside tailored support through individual appointments and group sessions focused on application preparation and interview skills. Prior to roles being advertised, checks are undertaken to ensure pay rates – while they may vary depending on the role – and employment conditions align with applicable laws, including awards, enterprise agreements and National Employment Standards. Students employed directly by the University are provided with clear information outlining their employment conditions and entitlements.

POLICY FRAMEWORK AND DUE DILIGENCE

The Macquarie Student Employment Service supports students in preparing for and undertaking job searches through individual appointments, group sessions, AI-powered tools, **online learning resources** and a jobs board delivered through CareerHub. These services are designed to provide reliable information, build employability capability and promote informed participation in the labour market.

RISK MITIGATION AND EMPLOYMENT CONTROLS

Where the University employs students, employment arrangements are governed by applicable employment laws, including relevant enterprise agreements, modern awards and the National Employment Standards. These frameworks establish minimum employment conditions and provide protections intended to prevent exploitative practices and support lawful, fair employment.

STUDENT SAFEGUARDS AND SUPPORT

Through the provision of career guidance, access to reputable employment opportunities and information on workplace rights, the University seeks to support students to make informed employment decisions and reduce exposure to exploitation risks. These measures form part of the University's broader approach to student wellbeing and ethical engagement with student employment pathways.

GLOBAL EDUCATION AND EXCHANGE

MODERN SLAVERY RISK CONTEXT

The global education, exchange and mobility programs involve engagement with international partners and jurisdictions that may present risks relating to exploitation, labour practices and modern slavery. These risks are managed through careful partner selection and structured oversight arrangements.

POLICY FRAMEWORK AND DUE DILIGENCE

Partners for student exchange and mobility programs are selected through a formal assessment process, with input from in-country representatives. Prior to entering into formal agreements, the University undertakes due diligence, including risk assessments and a documented business justification, to ensure alignment with legislative requirements and the University's ethical standards.

RISK MITIGATION AND CONTRACTUAL CONTROLS

Agreements governing global education and exchange partnerships include standard clauses that define exploitation, commit both parties to act against exploitative practices, require notification of alleged exploitation, and provide for termination where continued participation would cause the University to breach its obligations in relation to exploitation or modern slavery.

STUDENT PREPAREDNESS AND SAFEGUARDS

Students participating in global education and exchange programs are required to complete mandatory pre-departure training, which includes safety, wellbeing and regulatory information. Through these measures, the University seeks to support informed participation and reduce exposure to exploitation risks while students are undertaking overseas activities.

INTERNATIONAL STUDENT RECRUITMENT AND SUPPORT

MODERN SLAVERY RISK CONTEXT

International students form an important and diverse part of the University community. The University recognises, however, that international students may experience heightened vulnerability to exploitation, including wage theft, coercive practices and unsafe working conditions. These risks can arise due to unfamiliarity with Australian workplace laws, visa-related pressures, financial dependence, and reliance on third-party employers or accommodation providers. Addressing these risks is a key component of the University's approach to preventing modern slavery and related forms of harm.

POLICY FRAMEWORK AND DUE DILIGENCE

The University's international student onboarding framework incorporates measures designed to support awareness, early intervention and access to assistance. This includes strengthened pre-departure and arrival stage communications, online information sessions outlining workplace rights and minimum employment standards, and continued access to the Guide to Life resource to support students throughout their transition and study journey. These measures are intended to ensure students are informed of their rights and know how to seek support where concerns arise.

RISK MITIGATION AND EMPLOYMENT CONTROLS

In 2025, the University continued to provide paid opportunities for more than 60 international students to participate in recruitment and conversion activities. These roles are designed to offer meaningful work experience, build professional capability and reinforce the University's commitment to fair, lawful and inclusive employment practices. Employment arrangements are structured to align with enterprise agreement standards and are supported through appropriate supervision and oversight.

COMMUNICATION AND STUDENT SAFEGUARDS

To support consistent and transparent engagement across recruitment channels, the University continues to distribute a dedicated newsletter to offshore and onshore education agents. This communication mechanism supports alignment with the University's expectations, compliance requirements and student support initiatives, and reinforces shared responsibility for student wellbeing throughout the recruitment and enrolment lifecycle.

WORK INTEGRATED LEARNING (INCLUDING PACE)

MODERN SLAVERY RISK CONTEXT

Work-integrated learning (WIL), including PACE (Professional and Community Engagement) activities, provides valuable opportunities for students to gain practical experience. However, students participating in work-related learning activities may be vulnerable to risks of exploitation, including those associated with modern slavery practices and inequitable participation in the labour market. The University is committed to supporting safe, lawful and fair learning experiences that respect students' rights and wellbeing.

POLICY FRAMEWORK AND STUDENT PROTECTIONS

The University ensures that students have access to information and support regarding workforce participation and employment rights in Australia. WIL, including PACE, is governed by policies and processes designed to protect students while supporting academic outcomes.

RISK MITIGATION AND PARTNER ASSURANCE

WIL opportunities are approved and managed to ensure quality learning experiences aligned with academic requirements. Opportunities are endorsed only where they comply with applicable legislation, including the *Fair Work Act 2009* (Cth), such as the definitional requirements for unpaid vocational placements. Industry and employer partners are approved, reviewed and subject to quality assurance processes to manage risks associated with exploitation and unfair labour practices.

GOVERNANCE AND OVERSIGHT

Through these approval, monitoring and assurance mechanisms, the University seeks to minimise modern slavery and exploitation risks within work-based learning activities and to support equitable, ethical participation in the workforce.

ADDRESSING RESEARCH RISKS

INTERNATIONAL RESEARCH COLLABORATION

MODERN SLAVERY RISK CONTEXT

International research collaboration and engagement can give rise to a range of risks, including those associated with foreign interference, export controls and related ethical, human rights and modern slavery considerations. These risks can arise through partnerships, overseas activities, third-party service providers and research supply chains operating in higher risk jurisdictions.

POLICY FRAMEWORK AND DUE DILIGENCE

To support awareness and consistent practice across the institution, the University maintains a Countering Foreign Interference Community of Practice comprising staff involved in international relations and research arrangements. The University also maintains Counter Foreign Interference Due Diligence Advice to support transparent, consistent and procedurally fair approaches to international research collaboration. These frameworks inform the assessment of proposed research activities and partnerships, including consideration of modern slavery risks.

RISK MITIGATION AND GOVERNANCE CONTROLS

The Research portfolio applies structured review processes to research applications and international collaborations to identify and manage potential risks, including modern slavery concerns. These processes operate across the lifecycle of research activities and enable appropriate escalation where risks are identified. The Deputy Vice-Chancellor (Research) may modify, suspend or terminate research projects or collaborations where concerns cannot be adequately mitigated.

CAPABILITY BUILDING AND OVERSIGHT

During 2025, the Countering Foreign Interference Community of Practice continued to facilitate knowledge sharing and collaboration, particularly in response to evolving export control legislation and regulatory requirements. Through ongoing oversight, guidance and capability-building activities, the University seeks to support responsible international research engagement while managing foreign interference and related ethical risks.

ADDRESSING HUMAN CAPITAL RISKS: OUR PEOPLE AND PARTNERS

PROFESSIONAL AND ACADEMIC STAFF

MODERN SLAVERY RISK CONTEXT

Modern slavery risks in our workforce may arise through employment practices involving casual or contingent arrangements, labour hire, payroll errors, or the engagement of third-party recruitment providers. These risks are mitigated through strong governance, regulated employment frameworks and central oversight of recruitment and employment practices.

POLICY FRAMEWORK AND DUE DILIGENCE

In 2025, the University employed 3081 continuing and fixed-term professional and academic staff under the Macquarie University Professional Staff Enterprise Agreement 2023 and the Macquarie University Academic Staff Enterprise Agreement 2023. Staff employed within MQ Health are generally covered by the Macquarie University Hospital and NSW NMA/ANMF Enterprise Agreement 2024 or the MQ Health Staff (Support Services) Enterprise Agreement 2023. Staff engaged by U@MQ and Macquarie University Services who are not covered by a modern award are subject to the National Employment Standards, which establish minimum employment conditions. In 2025, a total of 1088 staff were employed across the University's entities.

Senior executives are engaged under individual employment contracts that comply with legislative requirements, while casual staff are engaged through casual employment contracts that regulate their terms and conditions. Where additional temporary workers are required, the University may engage licensed and accredited recruitment agencies to support ethical recruitment practices and appropriate remuneration.

RISK MITIGATION AND EMPLOYMENT CONTROLS

Employment arrangements at the University are governed by applicable legislation, enterprise agreements, modern awards, and internal policies and procedures. Measures to prevent and address modern slavery risks are embedded within enterprise agreements, compliant common law employment contracts, relevant modern awards and the National Employment Standards, providing clear protections for workers and consistent application of lawful employment conditions.

EMPLOYEE PAYMENTS REVIEW

The University has completed its review of issues giving rise to potential shortfalls in wage compliance to ensure staff payments remain accurate and consistent, reflecting the sector-wide focus on this issue. The University continues to finalise outstanding remediation payments from the review. Improvements have been made to systems and processes to ensure compliance with legal and industrial instruments and further work is planned. Engagement with the Fair Work Ombudsman is ongoing, and the University continues to keep affected current and former staff and unions informed of progress.

AWARENESS, CAPABILITY AND OVERSIGHT

Human Resources and Human Resources Shared Services oversee recruitment and employment processes across the University, including background screening and verification of a staff member's legal right to work in Australia. As part of the University's approach to managing modern slavery risks, awareness training is included in staff induction and is mandatory for all staff every two years. In 2025, 3319 staff members completed this compulsory training.

INTERNATIONAL EDUCATION AGENTS

Table 2: International agent network by region

Region	% (2025)
Oceania	14%
South Asia	28%
Southeast Asia	18%
Africa	2%
Americas (North and South)	5%
East Asia	23%
Middle East	4%
Europe	6%

MODERN SLAVERY RISK CONTEXT

International education agents form part of the University's student recruitment supply chain and may operate across multiple jurisdictions. The University recognises that this context can present heightened modern slavery risks, including unethical recruitment practices, excessive or opaque fee charging, unfair remuneration arrangements, or reliance on sub-agents without appropriate oversight.

POLICY FRAMEWORK AND DUE DILIGENCE

The University continues to apply the **International Education Agent Policy** and associated procedures as its primary control framework for managing these risks. This framework governs the appointment, management and review of international education agents in domestic and international contexts, and supports compliance with relevant legislation and regulatory requirements.

Comprehensive due diligence is undertaken prior to the appointment of any education recruitment agent. This includes referee checks, verification of company registration and governance arrangements, confirmation of training credentials, and assessment of historical performance and conduct. These measures are intended to identify potential indicators of unethical behaviour or labour exploitation within recruitment practices.

RISK MITIGATION AND CAPABILITY BUILDING

Agents are required to complete recognised professional training such as the Qualified Education Agent Counsellor program through industry bodies. This training addresses relevant legislation, international education standards and codes of ethical conduct, reinforcing expectations relating to lawful operation, transparency, and fair treatment of workers and students.

Regardless of location, agents are required to comply with New South Wales and Commonwealth legislation, including the *Education Services for Overseas Students Act 2000* (Cth), associated regulations, and the National Code of Practice for Providers of Education and Training to Overseas Students 2018.

CAPABILITY BUILDING, COMMUNICATION AND ENGAGEMENT

Capability building and information sharing support the effective operation of the agent governance framework. In 2025, the University conducted its inaugural Macquarie University Education Agency Perception Survey, gathering structured feedback from international education agents on their experience working with the University. The survey provided insight into student decision-making trends, the University's positioning as a study destination, and the effectiveness of recruitment and admissions support. Findings inform continuous improvement, including the identification of targeted training needs and priorities for future engagement activities, webinars and briefings.

Training, regulatory updates and University expectations are communicated through multiple channels, including direct engagement by Future Students team members, regular newsletters, webinars and the Agent Portal, which serves as a central resource hub. Targeted engagement activities in key markets further support consistent understanding of policies, processes and compliance requirements among agency directors, senior personnel and counsellors.

OVERSIGHT, MONITORING AND GOVERNANCE CONTROLS

The Future Students International team oversees the University's international education agent portfolio, including the management of formal agency agreements and the ongoing monitoring of agent performance and compliance. Agents are subject to annual reviews, with discretionary reviews undertaken where required, to assess performance indicators, conversion and attrition outcomes, and identify any emerging compliance or conduct issues.

As part of this quality assurance framework, the University conducts surveys of commencing international students who have engaged an education agent. These surveys support early identification of performance concerns, training needs or potential misconduct and enable timely intervention. Sub agents may not be engaged without the University's explicit written approval, ensuring oversight is maintained across recruitment networks and reducing exposure to opaque or uncontrolled recruitment practices.

Governance arrangements are underpinned by clear contractual controls. Agency agreements articulate expectations regarding lawful and ethical conduct and include termination provisions that enable prompt action in response to non-compliance, misconduct or identified modern slavery risks. These arrangements are supported by documented procedures set out in the International Education Agent Strategy and Operations Manual, providing a consistent framework for agent oversight, escalation and enforcement.

CONSULTANTS AND CONTRACTORS

MODERN SLAVERY RISK CONTEXT

Modern slavery risks may arise through the engagement of consultants and contractors, particularly where services are provided through third-party suppliers, labour hire arrangements or higher risk service categories. These risks are managed through a structured procurement and employment assessment framework designed to ensure appropriate engagement models and ethical labour practices.

POLICY FRAMEWORK AND DUE DILIGENCE

Strategic Procurement, in collaboration with Human Resources, applies the ProcureRight Framework and relevant employment law to determine the appropriate engagement model for consultants and contractors. This assessment considers the nature of the work, the relationship to the University's operations, and applicable regulatory and employment obligations to support consistent and compliant engagement decisions.

RISK MITIGATION AND CONTRACTUAL CONTROLS

Under the ProcureRight Framework's ongoing risk assessment process, suppliers operating in higher risk categories are subject to enhanced due diligence. This includes additional scrutiny of labour practices and supplier arrangements to support the identification and management of modern slavery risks prior to engagement and throughout the contract lifecycle.

OVERSIGHT AND MONITORING

Through coordinated oversight by Strategic Procurement and Human Resources, the University seeks to ensure that consultant and contractor engagements remain compliant with legislative requirements and aligned with the University's ethical standards. These arrangements support ongoing monitoring and proportionate responses where risks are identified.

ADDRESSING FINANCIAL, PROCUREMENT AND SUPPLY CHAIN RISKS

PHILANTHROPY AND ALUMNI RELATIONS

MODERN SLAVERY RISK CONTEXT

Philanthropic funding and donor engagement form part of the University's broader value chain, and may present modern slavery and human rights risks. These risks may arise where funds originate from unethical, illegal or exploitative activities, or where donor relationships give rise to reputational, legal or ethical concerns. While philanthropic support plays an important role in advancing the University's mission and enhancing the student experience, these activities require appropriate oversight to ensure alignment with the University's values, ethical standards and legal obligations.

POLICY FRAMEWORK AND DUE DILIGENCE

A clearly defined due diligence framework governs the acceptance of philanthropic gifts, donations and bequests. The Philanthropy and Alumni Relations Due Diligence Policy sets out the processes used to screen potential contributions, the levels of review required at different monetary thresholds, and requirements to ensure that donations are not connected to illegal activity or reputational risk. Due diligence is undertaken prior to entering into any gift agreement and may involve internal and/or external investigation to identify potential risks, including modern slavery and other unethical conduct.

RISK MITIGATION AND GOVERNANCE CONTROLS

The objectives of due diligence are to confirm, to the best of the University's knowledge, that donated funds are ethically sourced and to identify any reputational, legal or ethical risks associated with accepting contributions from prospective donors. Assessments may include consideration of donor background, source of funds and any conditions attached to a gift. Reporting is documented using the Prospect Development Investigation Brief template, which provides structured consideration of identified risks.

Key risks assessed may include involvement in illegal or unethical activities (including modern slavery), the possibility that funds originate from unlawful or unethical sources, attempts to improperly influence University decision-making, involvement in legal proceedings, participation in social or environmental controversies, association with controversial industries, potential for adverse media attention, and potential non-compliance with the *Foreign Relations Act 2021* and the University's Foreign Interference Taskforce Guidelines.

OVERSIGHT AND ETHICAL SAFEGUARDS

Through structured due diligence, risk assessment and governance controls, the University seeks to ensure that philanthropic engagement is conducted ethically, transparently and in a manner that respects human rights. These arrangements support responsible fundraising practices and form part of the University's broader commitment to continuous improvement in managing modern slavery and ethical sourcing risks.

INVESTMENT AND TREASURY MANAGEMENT

MODERN SLAVERY RISK CONTEXT

Investment activities can present modern slavery and human rights risks through exposure to external entities and financial markets. Macquarie University maintains a limited investment portfolio, which reduces the scale and complexity of these risks compared to many other Australian universities and institutions.

POLICY FRAMEWORK AND FINANCIAL STEWARDSHIP

The University's Investment and Treasury Risk Management Policy governs financial decision-making and ensures that all investment and treasury activities are conducted with integrity, ethical consideration and sound stewardship.

The policy is designed to support the University's long-term financial sustainability while maintaining high standards of probity and accountability.

GOVERNANCE AND CONTROLS

Financial probity is a core principle underpinning the University's investment approach. Through the application of its investment and treasury governance framework, the University seeks to manage financial risks responsibly and to minimise exposure to unethical practices, including modern slavery risks, within its limited investment activities.

PROPERTY SERVICES

MODERN SLAVERY RISK CONTEXT

Property services activities – including cleaning, security, waste management, maintenance and other facilities operations – present heightened modern slavery risks due to labour-intensive service delivery models, subcontracting arrangements and the engagement of vulnerable worker cohorts, including migrant and low wage workers. Where these factors are present, strong oversight is required to ensure ethical, lawful and fair labour practices.

POLICY FRAMEWORK AND DUE DILIGENCE

Property Services contracts are managed through structured procurement and contract management frameworks that embed requirements to identify, prevent and manage modern slavery risks. Contractors operating in higher risk service categories are subject to enhanced due diligence requirements, including assessment of labour practices, supply chain arrangements and workforce management systems. Although this requirement has not been invoked under the Property Services contracts, where heightened risk is identified, contractors will be required to develop a Modern Slavery Management Plan and comply with recognised standards, including the NSW Anti-slavery Commissioner's Migrant Worker Standard.

RISK MITIGATION AND CONTRACTUAL CONTROLS

Contracts governing property-related services include clear obligations requiring contractors to maintain appropriate policies, procedures and training to address modern slavery risks across their operations and supply chains. Contractors are required to cooperate with the University by providing access to relevant documentation and records, participating in audits, and supporting the University's reporting obligations under Australian modern slavery legislation. These controls reinforce expectations of transparency, accountability and continuous improvement.

OVERSIGHT AND MONITORING

The University monitors contractor compliance with modern slavery obligations through structured contract management and governance arrangements. Suppliers operating in higher-risk or vulnerable service categories, including cleaning, maintenance, security, facilities management, waste services, landscaping, and other labour-intensive services, are subject to regular oversight through established contract governance forums. These forums provide mechanisms to raise, document and address ethical, labour and compliance concerns through performance and compliance reviews, as well as contractor-submitted reporting. Where a potential modern slavery risk or issue is identified, contractors may be required to develop and implement an action or remediation plan, which is monitored through existing governance processes. To date, no such action plans have been required.

Contractual provisions also grant the University rights to access supplier information and conduct audits; these rights have been exercised in response to identified issues and will continue to be applied where necessary within vulnerable service categories. These arrangements support verification of compliance in practice, early identification and escalation of emerging risks, and continuous improvement across the University's service delivery portfolio.

PROCUREMENT, SUPPLY CHAIN AND SUPPLIER GOVERNANCE

MODERN SLAVERY RISK CONTEXT

Procurement activities present significant modern slavery risks due to complex global supply chains, diverse sourcing markets and the presence of vulnerable labour in higher risk goods, services and outsourced operations. As a large and multifaceted institution, these risks may arise across procurement activities supporting teaching, research, partnerships and investments, particularly where supply chains extend beyond Tier 1 suppliers or operate in higher risk jurisdictions.

POLICY FRAMEWORK AND DUE DILIGENCE

Building on foundational work from previous reporting periods, the University continues to embed modern slavery considerations into procurement processes, governance frameworks and supplier engagement practices. This includes strengthening due diligence procedures, improving visibility over outsourced services and ensuring suppliers understand and comply with the University's expectations for ethical conduct and responsible business practices. The University leverages sector-wide collaboration through the AUPN and engagement with the NSW Anti-slavery Commissioner's Office to inform supplier screening, risk assessment and capability building.

RISK MITIGATION AND CONTRACTUAL CONTROLS

Robust governance structures support the oversight and management of modern slavery risks within procurement. These include risk-based supplier categorisation, enhanced due diligence for higher risk suppliers, clear contractual expectations, and mechanisms to escalate, investigate and manage identified concerns. Suppliers are expected to demonstrate transparency, provide relevant documentation and cooperate with investigations or remediation activities where required. These controls promote accountability and alignment with legislative, sector and University standards.

OVERSIGHT, MONITORING AND CONTINUOUS IMPROVEMENT

In 2025, the University further enhanced its procurement operations through the integration of digital tools, including AI-enabled solutions, to strengthen monitoring and streamline modern slavery risk management. These technologies support automated data analysis, prioritisation of higher risk supply categories, improved supplier engagement and more efficient processing of due diligence information. Ongoing monitoring is undertaken through supplier reporting, performance reviews, issue tracking and collaboration with sector partners to identify emerging risks and support evidence-based interventions. Through continual monitoring, education and sector collaboration, the University continues to develop a resilient and ethically responsible procurement framework.

Criterion 5: Assessing the effectiveness of actions taken

Macquarie University assesses the effectiveness of actions taken to address modern slavery risks by monitoring the implementation of controls (inputs), the uptake and completion of key activities (outputs), and the extent to which these activities improve risk visibility and supplier engagement over time (outcomes). Effectiveness is assessed across procurement and supply chain governance, workforce awareness and capability, student vulnerability controls, and external collaboration and sector benchmarking. The University continues to mature its approach from foundational compliance activities to more systematic monitoring, digitised risk management, and evidence-based prioritisation of higher risk categories and cohorts.

Since the University's first statement in 2020, the modern slavery program has progressed from baseline risk recognition and sector engagement to increasingly structured governance, due diligence, and capability uplift across procurement, workforce awareness and student-related risk controls. Over 2021–2024, the University strengthened risk visibility and embedded processes, with a particular focus on procurement and higher risk external relationships. In 2025, the program continues this trajectory through enhanced spend-based analytics, digitised supplier engagement and monitoring, mandated staff training with recorded completion, and strengthened controls for international education agents and work-integrated learning governance.

Macquarie University has ongoing commitment to respect and protect the human rights of our staff, students and community members, and continues to look for ways to identify and prevent any instances of modern slavery in our operations and supply chains.

SUMMARY OF KEY GOVERNANCE ACTIONS

Macquarie University has established and maintained a structured governance framework to oversee the identification, management and mitigation of modern slavery risks across its operations and supply chains. Key governance actions include:

POLICY AND FRAMEWORK OVERSIGHT

A **Modern Slavery Policy** has been developed and is supported by a suite of related policies and frameworks, including the **Supplier Code of Conduct**. These instruments are reviewed periodically to ensure alignment with legislative requirements and evolving best practice.

CONTRACTUAL GOVERNANCE CONTROLS

Modern slavery-specific clauses are incorporated into contractual templates where an identifiable risk exists, providing rights to review, inspect, audit, require remediation or terminate agreements. These contractual provisions are regularly reviewed to maintain relevance and effectiveness.

PROCUREMENT GOVERNANCE INTEGRATION

Modern slavery requirements are embedded within the University's procurement governance framework through ProcureRight. This ensures that modern slavery considerations are applied consistently at key decision points and that supplier compliance with the *Modern Slavery Act* is assessed prior to engagement.

SUPPLIER GOVERNANCE AND RISK CATEGORISATION

A supplier governance framework has been established to support risk-based categorisation, enhanced due diligence for higher risk suppliers, and escalation of identified concerns. Suppliers are expected to demonstrate transparency and cooperate with governance processes.

SUPPLY CHAIN TRANSPARENCY MECHANISMS

Governance arrangements require the use of a modern slavery supplier questionnaire within tendering processes to support consistent data collection, risk assessment and decision-making.

EXTERNAL OVERSIGHT AND BENCHMARKING

The University participates in sector-wide governance initiatives, including those led by the AUPN and the University Procurement Hub (UPH), to benchmark practices, share insights and strengthen governance maturity.

REGULATORY ENGAGEMENT

Ongoing engagement with regulators and policymakers, including review of guidance issued by the NSW Anti-slavery Commissioner, supports alignment of University governance arrangements with emerging regulatory expectations.

YEAR-ON-YEAR PROGRESSION IN MODERN SLAVERY RISK MANAGEMENT (2020–2025)

	Supply chain operations	Our people – staff	Our people – students	Research
2020 INITIAL RESPONSE TO THE MODERN SLAVERY ACT	KEY OBJECTIVE Establishing initial understanding of modern slavery risks across operations and supply chains. KEY ACTIONS: - Identified high-level modern slavery risks in supply chains. - Conducted initial awareness sessions for staff on modern slavery and human rights. - Began mapping key suppliers and procurement categories for risk exposure.	KEY OBJECTIVE Establish baseline visibility of modern slavery risks across workforce and recruitment channels, including staff, labour hire and agent networks. KEY ACTIONS: - Identified risk scenarios; mapped recruitment and agent processes. - Identified potential exploitation points.	KEY OBJECTIVE Build initial foundations for student safety, wellbeing and reporting pathways, with early visibility of exploitation and modern slavery risks. KEY ACTIONS: - Mapped exploitation risk scenarios, including coercion, unsafe housing or work, wage theft and financial vulnerability. - Established early reporting and referral pathways for student wellbeing and safety concerns. - Published introductory guidance on rights, support services and help-seeking pathways for new and international students.	KEY OBJECTIVE Establish foundational protections in international research collaborations, ensuring agreements and due diligence processes reflect ethical, human rights and modern slavery considerations. KEY ACTIONS: - Updated research agreement templates to include modern slavery, anti-bribery and anti-corruption commitments. - Conducted due diligence on entities proposed for formal research collaboration. - Strengthened awareness of ethical responsibilities in international research engagement.
2021 ESTABLISHED PRACTICES	KEY OBJECTIVE Enhancing risk assessment processes to inform proactive due diligence. KEY ACTIONS: - Introduced structured supplier questionnaires to capture risk information. - Embedded risk considerations into procurement documentation and sourcing processes. - Began assessing suppliers based on their risk profile.	KEY OBJECTIVE Implement recruitment and employment controls to minimise exposure to high-risk practices across internal staff and external agents. KEY ACTIONS: Standardised recruitment checks; applied agent policy framework; embedded induction awareness.	KEY OBJECTIVE Formalise reporting, wellbeing and induction processes and introduce baseline controls across student wellbeing, employment and mobility. KEY ACTIONS: - Enabled online reporting pathways through the Inappropriate and Unwanted Behaviour system and CARE wellbeing referrals. - Expanded student onboarding resources to include rights, safety and support information. - Introduced minimum due diligence requirements for WIL and global mobility partner approval.	KEY OBJECTIVE Strengthen alignment with legislative obligations and formalise consistent due diligence requirements for international research collaborations. KEY ACTIONS: - Aligned research templates and due diligence processes with obligations under the Act. - Applied consistent human rights and modern slavery controls across research partnerships. - Reinforced expectations regarding ethical conduct within research collaborations.
2022 ENHANCED PRACTICES	KEY OBJECTIVE Strengthening organisational capability and culture through education, training and partnerships. KEY ACTIONS: - Ensured training availability and resources for staff on modern slavery risks. - Collaborated with industry partners to share best practices and tools. - Updated frameworks based on emerging global risks and operational learnings.	KEY OBJECTIVE Strengthen due diligence, onboarding verification and training frameworks for all personnel and recruitment partners. KEY ACTIONS: - Enhanced due diligence for staff hiring, labour hire and agent appointment, including governance checks, verification of training credentials, and review of performance and conduct history. - Established mandatory biannual modern slavery training with centralised completion tracking. - Clarified conditions for engaging licensed recruitment agencies.	KEY OBJECTIVE Embed modern slavery and workplace rights awareness across student leadership, peer programs and digital channels, and strengthen partner screening for WIL (including PACE) and Global Education and Exchange. KEY ACTIONS: - Embedded modern slavery and workplace rights content into student leadership and peer-to-peer programs. - Extended digital awareness through the Modern Slavery webpage, iLearn, campus screens and student publications. - Standardised pre-departure training for all global mobility participants.	KEY OBJECTIVE Embed structured ethical risk assessments into research processes, including modern slavery and human rights safeguards across research activities and outcomes. KEY ACTIONS: - Applied the Research Risk Review Procedure to identify modern slavery and human rights concerns in research activities and outcomes. - Embedded the Code for the Responsible Conduct of Research across all researcher cohorts. - Increased scrutiny of collaborators operating in higher risk jurisdictions.

	Supply chain operations	Our people – staff	Our people – students	Research
2023 MATURING PRACTICES	KEY OBJECTIVE Improving processes and frameworks to respond to emerging risks and operational insights. KEY ACTIONS: - Reviewed and refined supplier risk-assessment tools. - Strengthened internal governance and oversight mechanisms. - Incorporated learnings from previous years into updated policies.	KEY OBJECTIVE Integrate updated enterprise agreements and enhance governance over contingent staffing and international recruitment agents. KEY ACTIONS: - Implemented updated Professional and Academic Staff Enterprise Agreements (2023) and aligned employment templates across staff categories. - Strengthened governance arrangements for contingent and casual engagements. - Prohibited sub-agent activity without explicit approval and required recognised professional training (eg QEAC).	KEY OBJECTIVE Strengthen partner quality assurance and deepen external expert involvement in supporting students. KEY ACTIONS: - Strengthened WIL quality assurance to ensure placements meet <i>Fair Work Act</i> requirements. - Engaged external experts, including Red Cross and Anti Slavery Australia, to support student leaders and groups. - Improved CARE triage and response pathways for higher risk student cohorts.	KEY OBJECTIVE Expand governance capability by addressing foreign interference risks and contributing to national and global modern slavery research and policy discourse. KEY ACTIONS: - Strengthened governance through the establishment of the Countering Foreign Interference Community of Practice and adoption of sector-wide foreign interference due diligence tools. - Expanded modern slavery research impact, including the launch of the fourth edition of the Chocolate Scorecard in March 2023 and cross-institution collaborations influencing public policy and legislative review. - Enhanced external engagement through international publications, media contributions and participation in academic and sector forums.
2024 STRENGTHENING FOUNDATIONS FOR ACTION AND ACCOUNTABILITY	KEY OBJECTIVE Setting the stage for more formal monitoring and accountability processes across suppliers. KEY ACTIONS: - Planned implementation of supplier performance tracking and reporting mechanisms. - Designed audit and review processes for higher-risk suppliers. - Developed mitigation strategies informed by previous years' learnings.	KEY OBJECTIVE Move towards proactive monitoring and review of employment and agent related risks across all channels. KEY ACTIONS: - Increase monitoring and compliance checks for workforce arrangements and agent performance. - Conducted annual and discretionary agent reviews lined to emerging risk indicators. - Embed escalation, rectification and contract enforcement steps for any non-compliance.	KEY OBJECTIVE Shift from reactive support to proactive monitoring, targeted communications and consistent assurance across all student engagement channels. KEY ACTIONS: - Monitored completion of training modules and addressed emerging non-completion trends. - Conducted regular reviews of global mobility partners, applying exploitation and termination clauses consistently. - Delivered tailored communications for international students, informed by external roundtables and lived experience insights.	KEY OBJECTIVE Mature due diligence and governance mechanisms, ensuring transparent, procedurally fair assessments and strengthened escalation pathways for higher risk research collaborations. KEY ACTIONS: - Implemented Counter Foreign Interference Due Diligence Advice to support transparent, consistent and fair assessments. - Enabled the Deputy Vice-Chancellor (Research) to modify or suspend research where modern slavery or related risks are identified. - Advanced research impact through continued Coffee Scorecard work and contributions to legislative and policy development.

	Supply chain operations	Our people – staff	Our people – students	Research
2025 TRANSLATING TRANSPARENCY INTO STRUCTURED CAPABILITY	KEY OBJECTIVE Building strong, transparent relationships with suppliers while strengthening oversight and accountability. KEY ACTIONS: • Developed the Supplier Toolkit for higher-risk suppliers to support compliance and transparency. • Began structured supplier engagement activities for higher-risk categories.	KEY OBJECTIVE Maintain strong governance across employment and agent engagements through regulated frameworks, ethical recruitment practices and central oversight to mitigate modern slavery risks. KEY ACTIONS: • Applied enterprise agreements and National Employment Standards across staff cohorts, supported by compliant contracts for senior executives and casual staff. • Maintained central HR and HR Shared Services oversight of recruitment, background screening and right to work verification. • Required recognised agent training and compliance with the ESOS Act and National Code. • Conducted rigorous due diligence prior to agent appointment, with ongoing monitoring through annual reviews. • Ensured termination provisions enable timely action in response to misconduct or modern slavery indicators. • Undertook wage compliance reviews to support accurate and consistent staff payments.	KEY OBJECTIVE Deliver a mature, integrated framework that protects and empowers students through clear reporting pathways, ethical employment practices, robust mobility oversight and accessible wellbeing services. KEY ACTIONS: • Maintained dual reporting pathways through the Inappropriate and Unwanted Behaviour system and CARE wellbeing triage. • Embedded integrated awareness and capability programs, including student leader induction, Red Cross Work Right Hub modules and digital onboarding. • Ensured ethical student employment practices, including supervised paid opportunities for international students, mobility agreements with exploitation safeguards, and comprehensive access to wellbeing services (Thrive Hub, counselling, bulk-billed GP services, housing and safety advice).	KEY OBJECTIVE Operate an integrated, institution -wide governance system that manages modern slavery, human rights, export control and foreign interference risks across global research engagement while contributing sector leadership through influential research. KEY ACTIONS: • Applied lifecycle risk review processes for international research engagements, with escalation to modify, suspend or terminate projects where concerns could not be mitigated. • Maintained capability building through the Community of Practice in response to evolving export control and ethical requirements. • Led nationally significant modern slavery research through the A2J Lab, producing reforms-focused publications that strengthen Australia's modern slavery framework and inform corporate accountability.

*Bringing students
and staff together in
a hub of discovery*

Criterion 6: Consultation, collaboration and engagement

Macquarie University undertakes consultation, collaboration and engagement as an integral part of its approach to managing modern slavery risks across operations and supply chains. Building on previous work, the University maintains active engagement with internal stakeholders to identify priority risk areas, inform decision-making and support the consistent application of governance and control frameworks.

Internal consultation occurs across staff, students and key functional areas, enabling practical insights to inform risk prioritisation, training, student support mechanisms and operational processes. These engagements support early identification of risks and ensure that modern slavery considerations are embedded into everyday practices.

The University also collaborates with external partners and sector networks to strengthen its approach. Participation in initiatives led by the AUPN, UPH and Higher Education Services (HES) enables shared learning, benchmarking and the development of tools to enhance supply-chain transparency and risk management. Engagement with business partners and suppliers reinforces expectations for ethical conduct and supports the application of contractual controls, monitoring and remediation where required.

Guidance from regulators, including the Office of the NSW Anti-slavery Commissioner, informs the University's approach to supporting vulnerable cohorts and identifying opportunities to strengthen governance and practice. Through ongoing consultation, collaboration and capacity-building, Macquarie University ensures that modern slavery awareness is embedded across its operations and that insights from stakeholders continue to inform risk mitigation efforts.

STAKEHOLDER CONSULTATION AND COLLABORATION MECHANISMS

Stakeholder group	Purpose of engagement	Key mechanisms	How this informs practice
Internal stakeholders (staff and students)	Identify priority risk areas; embed awareness; test practicality of controls	Internal forums, working groups, training programs, induction materials, student engagement activities	Informs risk prioritisation, awareness materials, training content and operational controls
University leaders and functional areas	Ensure consistent governance, accountability and escalation	Cross-functional collaboration across procurement, HR, research, student wellbeing and legal	Aligns modern slavery actions with enterprise risk management and operational decision-making
Sector networks (AUPN, UPH, HES)	Share intelligence, tools and good practice; reduce duplication	Active participation in sector programs, benchmarking initiatives and shared resources	Strengthens supply chain risk tools, supplier engagement approaches and transparency
Business partners and suppliers	Reinforce expectations and monitor compliance	Contractual engagement, supplier communications, audits, due diligence processes	Supports ethical practices, remediation pathways and continuous improvement
Regulators and policy bodies	Align with evolving regulatory expectations	Engagement with guidance and materials from the NSW Anti-slavery Commissioner	Informs approaches to supporting vulnerable cohorts and strengthening governance
External experts and practitioners	Access specialist knowledge and emerging insights	Participation in forums, expert engagement and collaborative initiatives	Enhances capability, informs policy review and supports innovation

INDUSTRY COLLABORATION

Macquarie University participates in sector-wide collaboration to strengthen its approach to identifying, managing and addressing modern slavery risks, particularly within complex supply chains. A key element of this collaboration is the University's involvement in the AUPN Modern Slavery Program, a higher education initiative involving universities across Australia and New Zealand that leverages collective purchasing power, shared expertise and common tools to improve ethical procurement practices and compliance with the *Modern Slavery Act 2018* (Cth).

Through the AUPN program, the University contributes to and benefits from sector-wide risk assessments, which support the identification and prioritisation of higher risk supply categories. These data-driven activities enable targeted interventions and improved visibility of modern slavery risks across procurement activities, including in areas such as medical equipment, information and communications technology, and international student recruitment.

Collaboration also supports capability uplift across the sector. The AUPN program facilitates knowledge sharing through expert forums, case studies, regular communications and professional development initiatives. This includes access to sector-wide learning resources and microcredentials designed to strengthen understanding of modern slavery risks and practical responses among staff and students. Through initiatives such as the Temporary Migrant Survey, which captured international student experiences, and the International Student Risk Roundtable, universities came together in 2025 to share ideas and information. These efforts were aimed at developing best-practice guidance and coordinated responses across the sector.

Supplier engagement is another core focus of the program. Through coordinated use of supplier assessment questionnaires and targeted engagement with higher risk suppliers, the sector works collectively to assess supplier maturity, identify common risk themes and support remediation where required. In higher risk categories, such as medical and laboratory consumables and electronics, collaborative monitoring and engagement initiatives provide additional assurance and support more consistent responses to identified issues.

The program is underpinned by strong collaboration with external organisations and subject matter experts, including partnerships that provide independent monitoring, advocacy, training and remediation support. Through continued participation in the AUPN Modern Slavery Program, Macquarie University contributes to collective action, continuous improvement and sector-wide capability uplift, while strengthening its own governance, risk management and ethical procurement practices.

Criterion 7: Other relevant information

RESEARCH, EDUCATION AND PUBLIC ENGAGEMENT ON MODERN SLAVERY

CONTRIBUTION TO UNDERSTANDING MODERN SLAVERY RISKS

As a higher education institution, Macquarie University contributes to efforts to prevent and address modern slavery through research, education and public engagement, alongside its operational governance and risk management activities. Interdisciplinary research and collaboration with external stakeholders aim to improve understanding of how modern slavery risks arise, assess the effectiveness of existing responses, and inform policy, regulatory and organisational practice in Australia and internationally.

Research undertaken at Macquarie University has examined how modern slavery risks can be embedded within organisational and supply-chain structures, particularly in industries characterised by complex subcontracting, fragmented accountability and limited transparency. This work highlights that modern slavery is often concealed within routine business practices and that compliance-based approaches alone may be insufficient unless supported by effective governance, ethical leadership, organisational culture and integrated management controls (**Management controls and modern slavery risks in the building and construction industry; Australian modern-day slavery: A systems perspective**).

SYSTEMS-BASED AND CROSS-SECTOR PERSPECTIVES

Macquarie researchers have adopted systems-based approaches that frame modern slavery as a complex social and economic problem that cannot be addressed by regulation or organisational action in isolation. This research emphasises the interconnected roles of governments, businesses, civil society, professional communities and academia, highlighting the importance of collaborative, cross-sector responses to identify and address exploitation across global supply chains (**Overcoming evil with good: The role of NGOs in combating modern slavery**).

Further research has examined the role of non-government organisations in addressing modern slavery, recognising their contributions to advocacy, victim support and systemic change, while also identifying the practical, political and resource constraints under which many NGOs operate. These findings reinforce the importance of partnerships between organisations, regulators and civil society actors to address modern slavery beyond minimum compliance requirements.

SUPPLY-CHAIN TRANSPARENCY AND ASSURANCE

Macquarie University researchers have contributed to emerging debates on supply-chain transparency and assurance, including analysis of the limitations of traditional social compliance audits. This research identifies that audit effectiveness is shaped not only by audit methodologies but also by the working conditions, safety and independence of auditors themselves. The findings point to the need for more robust, human-centred approaches to supply-chain assurance to improve the detection of labour exploitation and modern slavery risks (**How auditor working conditions limit supply chain transparency**).

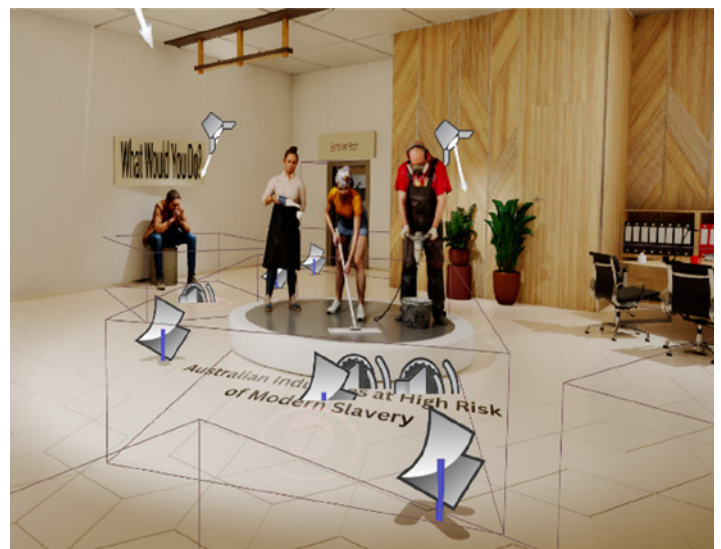
Recent publications in 2025 further explore related themes, including accountability, social and environmental challenges in supply chains, and value creation in agricultural industries:

- Dumay, J. (2025). 'Shared value in cocoa farming: Value for whom? And who gets the lion's share?'. *CAPCO Institute Journal of Financial Transformation*, 61 (September), 160–171.
- Perkiss, S., Dumay, J., Bernardi, C., Beattie, L.-R., & Harris, C. T. (2025). 'Accountability to tackle sustainability challenges in the cocoa supply chain'. *Accounting, Auditing & Accountability Journal*, 38(7), 1839–1867.
- Dumay, J. (2025). 'Being Critical About Intellectual Capital in 2024: Chocolate as a Manifesto for Social Change'. Springer Nature Switzerland.
- Dumay, J. (2025). 'Is eliminating poverty sustainable? A chocolatey critique on accounting for the Sustainable Development Goals'. Routledge.

EDUCATION AND CAPABILITY BUILDING

In parallel with research activity, the University continues to explore innovative educational approaches to build awareness, ethical capability and professional responsibility among students and future leaders. In 2025, this included the development of the Virtual Museum of Emancipation, an immersive virtual reality learning experience designed to engage accounting students with the historical and contemporary dimensions of modern slavery and the role of professional practice in addressing exploitation. Early findings indicate that immersive learning approaches can strengthen student awareness, ethical reflection and engagement with modern slavery issues.

The images below show the virtual museum environment, highlighting immersive exploration of historical and contemporary perspectives on modern slavery and professional responsibility.



BUSINESS AND HUMAN RIGHTS ACCESS TO JUSTICE LAB (A2J LAB)

The Business and Human Rights Access to Justice Lab (A2J Lab), based at Macquarie Law School, promotes corporate respect for human rights by supporting access to justice for individuals and communities affected by business-related human rights abuses in Australia, Asia and the Pacific. The Lab seeks to address power imbalances between corporations and rightsholders through applied research, development of practical tools, capacity building initiatives and pro bono support. Its work is undertaken in collaboration with academics, communities, businesses, trade unions, civil society organisations, legal practitioners, governments and United Nations agencies.

In 2025, Macquarie academics associated with the A2J Lab contributed to nationally significant research on modern slavery. This included **Options for action: Building an effective response to modern slavery in Australia (Professor Surya Deva, December 2025)**, commissioned by the Australian Anti-slavery Commissioner. The paper provides an evidence-based assessment of Australia's modern slavery framework, identifying limitations in enforcement, due diligence and access to remedy, and proposing reforms aligned with emerging international practice.

A second major publication, **Commitment gaps: A human rights assessment of top Australian companies (Georgette Haddad, Hayley Jago and Surya Deva, February 2025)**, examined the extent to which corporate human rights commitments are reflected in practice. The research identified persistent gaps in due diligence systems, worker protections and accountability mechanisms, highlighting how weaknesses in governance can allow modern slavery risks to remain unaddressed.



CONTRIBUTION TO THE UNIVERSITY'S MODERN SLAVERY APPROACH

Through these research, education and engagement activities, Macquarie University contributes to advancing knowledge, professional capability and leadership on modern slavery. This work complements the University's operational actions by informing policy development, strengthening organisational and professional practice, supporting regulatory reform and contributing to broader societal efforts to eliminate modern slavery.

POLICIES AND PRACTICES FOR PREVENTING AND MITIGATING MODERN SLAVERY

MODERN SLAVERY POLICY

The **Modern Slavery Policy** sets out the University's commitment to:

- identify, assess and minimise the risks of modern slavery in its operations and supply chains
- maintain responsible and transparent operations and supply chains.

POLICY FRAMEWORK – HUMAN RESOURCES

Our human resources policies and practices set out workplace rights and responsibilities at the University and include:

The **Staff Code of Conduct** confirms a commitment that staff are ethical, enquiring, creative, inclusive, agile and excellent. All staff are expected to perform their duties and conduct the academic and business activities of the University with efficiency, fairness, impartiality, integrity, honesty and compassion.

The **Discrimination, Bullying and Harassment Prevention Policy** outlines the rights and responsibilities of the University community for the achievement of a diverse, equitable, inclusive and safe campus environment, free from unlawful discrimination, bullying and harassment.

The **Public Interest Disclosure Policy** was updated in December 2023 in line with the **Public Interest Disclosures Act 2022** and the NSW Ombudsman Guidelines. The Policy establishes an internal system for receiving, assessing and dealing with internal reports of suspected wrongdoing. Staff undertake training of reporting wrongdoing as part of the onboarding to the University.

The University's complaint management process and procedures recognise that while the University aims to provide a high-quality teaching, research and learning environment that promotes respect and safety, and embraces diversity, there will be occasions when problems, misunderstandings or complaints arise that need to be managed in a fair, transparent and timely manner. Through Macquarie University's **complaints and misconduct reporting portal**, there are pathways for staff, students and members of the public to report complaints, including for threatening behaviour. The University also has a **Risk and Safety Reporting webpage** through which staff, students and members of public can report hazards, incidents, near miss incidents, injuries, illness and incidents that may involve an insurance claim.

POLICY FRAMEWORK – PROCUREMENT AND SUPPLY CHAINS

The University is committed to acting with integrity in all its dealings, relationships and supply chains. It expects the same standards from all its suppliers, contractors and others with whom we do business. In September 2019 the University launched the ProcureRight framework that governs all our procurement activities. The ProcureRight Instructions provide tools to enable a positive procurement experience while ensuring that all our activities are underpinned by the principles of business ethics, human rights and environmental protection. The ProcureRight Instructions incorporate the **Procurement Policy**, probity principles, relevant legislation and risk management. Strict approval processes embedded into the ProcureRight Instructions ensure that accountability for decisions reside with the authorised officers of the University.

POLICY FRAMEWORK – OTHER RELATED POLICIES AND PRACTICES

The University, through **Our University: A Framing of Dynamic Futures**, has made a commitment to adhering to the principles of sustainability in all it does, which is also reflected in the **Investment and Treasury Risk Management Policy** and the **Donations and Fundraising Policy**.

The **Code for the Responsible Conduct of Research** is central to the University's commitment to the highest standards of research integrity. We expect researchers to manage and conduct their research with the utmost professionalism and with respect and regard for humans, animals and the environment – irrespective of their funding situation, research area, experience or working arrangement. Our code is aligned with the standards set out in the Australian Code for the Responsible Conduct of Research.

In addition, the **Research Risk Review Procedure** enables the University to consider, control and mitigate the risk that outcomes of a research project or collaboration may be used by third parties to infringe human rights, and this includes considerations of modern slavery.

The **Controlled Entities Policy** establishes the University's governance framework for controlled entities.

STUDENT WELLBEING AND CODE OF CONDUCT

All University students have access to wellbeing assistance via **Student Wellbeing** at wellbeing@mq.edu.au and +61 (2) 9850 7497.

Students can submit a report through the **Inappropriate and Unwanted Behaviour reporting system** and specifically select 'Modern Slavery' as the report type. Alternatively, students seeking wellbeing support can submit a **CARE form**, select relevant subtopics such as 'mental health', 'financial', or 'welfare', and provide further details about their circumstances to access appropriate support and referrals.

Where the University does not have capacity or specialist skills to support complex wellbeing matters, external support and advice is sought.

The **Student Code of Conduct** gives students notice of general conduct that is prohibited. It is binding on all students, and any misconduct may be subject to disciplinary action.

Looking ahead: Progression and priorities for 2026

Over successive reporting periods, Macquarie University has progressed from establishing foundational governance and awareness measures to embedding modern slavery considerations into procurement, student engagement and operational practices.

In 2026, the University will continue this trajectory by deepening institutional capability, extending visibility beyond Tier 1 supply chains, and strengthening mechanisms to measure effectiveness and support remediation. Building on earlier investments in awareness, training and sector collaboration, the focus will shift from establishment to maturity, insight and impact.

Key actions:

- Enhancing modern slavery capability across the University through improved learning tools and educational resources for staff and students, ensuring awareness is embedded across operational areas and leadership pathways.
- Maintaining the central role of research, education and community engagement in supporting evidence-based practice and contributing to broader efforts to address modern slavery and related human rights risks.
- Extending supply chain risk visibility beyond Tier 1 by enhancing processes to identify and assess Tier 2 and lower tier risks with high-risk suppliers, in collaboration with the AUPN.
- Leveraging AUPN partnerships to strengthen independent monitoring and remediation in priority procurement categories.
- Applying contractual rights consistently to review, inspect, audit, remediate or terminate supplier agreements where risks are identified.
- Developing a centralised database to track supplier risk, quality and performance metrics over time, supporting more informed oversight and continuous improvement.

Student engagement and safeguards will continue to mature through a coordinated approach that strengthens awareness, wellbeing and protective supports. The University will build on existing initiatives to ensure students are informed, supported, and able to identify concerns and access help.

Key actions:

- Continuing modern slavery awareness through Red Cross Work Right Hub modules, integration into student leadership and peer-to-peer initiatives, and targeted outreach to international students.
- Monitoring engagement and completion rates to support continuous improvement of awareness activities.
- Expanding digital visibility through iLearn, student publications, and a clear, accessible website outlining reporting pathways and available supports.
- Maintaining comprehensive wellbeing and support services, including in-person assistance via the Thrive Hub, year-round wellbeing initiatives, and targeted support for housing, food security and personal safety.
- Ensuring access to health and support services such as bulk-billed GP appointments, free and confidential counselling, and interpreter services where required.
- Strengthening protective supports from 2026 through the Study Without Stress program, equipping students with practical skills to manage academic and broader life challenges.
- Sustaining the University's commitment to addressing modern slavery through education, innovation and collaboration, supported by consistent communication and engagement.

Through these next stage actions, Macquarie University moves from awareness and implementation towards measured impact, improved supply chain transparency and stronger support for vulnerable cohorts. This progression reflects the University's ongoing commitment to continuous improvement, responsible practice and the elimination of modern slavery across its operations and value chains.

Macquarie University is strongly committed to addressing modern slavery, through education, innovation and collaborative action.

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