Curtin University

Modern Slavery Statement 2024

Western Australia, Malaysia, Singapore, Dubai, Mauritius, Sri Lanka

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Statement of Compliance

This Modern Slavery Statement has been prepared in accordance with the provisions of the Modern Slavery Act 2018.

It was approved by the University's Council in its role as principal governing body on 30 April 2025.

Dr Vanessa Guthrie AO
Chancellor

Professor Harlene Hayne CNZM
Vice-Chancellor

About the Chancellor

Dr Vanessa Guthrie has served on Curtin's governing body, University Council, since 1 April 2017 — and was appointed as Pro-Chancellor from 1 April 2020, then as Chancellor from 1 April 2024. Dr Guthrie is a highly accomplished executive and Non-Executive Director with broad and strategic experience across a portfolio of Board positions. Dr Guthrie is a Non-Executive Director of Santos Limited, Lynas Rare Earths Limited, Orica and North American Construction Group Ltd; a Non-Executive Director of Cricket Australia; and Chair of FITE Brain Cancer.

Dr Guthrie has substantial experience in the mining industry in diverse roles including operations, environment, community, Indigenous affairs, corporate development and sustainability. She was made an Officer of the Order of Australia in 2021 for her contribution to sustainability in the mining industry and as a role model for women in business. She is a Fellow of the Australian Institute of Company Directors (FAICD), the Australian Academy of Technological Sciences and Engineering (FTSE) and the Australasian Institute of Mining and Metallurgy (FAusIMM).

Dr Guthrie has qualifications in geology, environment, law and business management, including a Doctor of Philosophy in Geology and an Honorary Doctor of Science from Curtin University.

Dr Vanessa Guthrie AO
Chancellor

Introduction from the Vice-Chancellor

About the Vice-Chancellor

Professor Hayne has been the Vice-Chancellor of Curtin University since April 2021, prior to this she was the Vice-Chancellor of the University of Otago, in New Zealand, since 2011. She served as Chair of the Australian Technology Network of Universities from April 2023 to April 2024.

Originally from the United States, Professor Hayne received a Bachelor of Arts from Colorado College, and a Master of Science and PhD in Behavioural Neuroscience from Rutgers University. She spent three years as a post-doctoral fellow at Princeton before joining the University of Otago in 1992, subsequently serving as Head of the Psychology Department and as Deputy Vice-Chancellor Research and Enterprise before being appointed as Vice-Chancellor. Professor Hayne continues to teach and conduct research. She has published widely in the areas of memory development and adolescent risk taking and continues to provide expert testimony in cases of wrongful conviction.

During her tenure at Otago, Professor Hayne was Chair of Universities New Zealand and the Universities New Zealand Research Committee and a member of the Board of Treasury and the Board of Fulbright New Zealand. In 2009 she was awarded the New Zealand Order of Merit (ONZM) for services to scientific and medical research. She received an Honorary Doctor of Science degree from Colorado College, USA, in 2012, and an Honorary Doctor of Laws degree by the University of Otago in 2021. In 2022, she was made a Companion of the New Zealand Order of Merit (CNZM), in recognition of her services to health and wellbeing.

Foreword

Curtin University recognises modern slavery as a serious global human rights concern and is committed to upholding human dignity and rights across all aspects of our operations. As an institution dedicated to serving society, we take our responsibility to prevent exploitation seriously and strive to embed social responsibility across our teaching, research operations and engagement.

Modern supply chains are complex and Curtin understands the sustained and concerted effort required to influence change and make a difference in the exploitation of vulnerable victims of modern slavery.

The university sector through the Australian University Procurement Network (AUPN) continues to leverage our collective power, influence and expertise to drive best practice in preventing, mitigating and remediating the risks of modern slavery in our supply chains.

Curtin has refined its sourcing and supplier engagement approach led by our centralised Strategic Procurement team driving a consistent and strategic approach to supplier relationships and transparency in the supply chain.

Professor Harlene Hayne CNZM
Vice-Chancellor

Criterion 1: Reporting Entity

This statement is for Curtin University (ABN 99 143 842 569). Curtin is a statutory body established under an Act of the Western Australian Parliament, the Curtin University Act 1966, with its registered office at Kent Street, Bentley, WA, 6102, Australia.

Criterion 2 (A): Structure & Operations

Structure

Curtin University is Western Australia's largest university, with 65,033 enrolled students across its Australian and international campuses in 2024*.

Established in 1986 and opening its doors to students in 1987, the University takes its name from John Curtin, the influential and widely respected former prime minister of Australia and continues to embrace his philosophy to 'look ever forward', instilling a culture of innovation in its teaching and research, and inspiring staff and students to strive for a better future for all.

Curtin is a globally focused institution that offers a wide range of undergraduate and postgraduate courses in business, humanities, health sciences, resources, engineering and science. A culturally diverse university, Curtin fosters tolerance and encourages the development of career-ready, well-rounded individuals.

A combination of first-rate resources, staff and infrastructure makes Curtin a major contributor to tertiary education, both within Australia and internationally.

Curtin has campuses in Australia, Malaysia, Singapore, Dubai, Mauritius and Sri Lanka. The University's largest campus, Curtin Perth, is in the suburb of Bentley, six kilometres south of the centre of Perth, Western Australia. Curtin has four other sites in the Perth central business district, a campus in east metropolitan Midland and a regional campus in Kalgoorlie.

Curtin University is a body corporate established under the *Curtin University Act 1966*, an Act of the Western Australian Parliament. It is domiciled in Australia.

The University is not an incorporated company under the Corporations Act 2001. Therefore, it does not have an Australian Company Number, nor does it have a Certificate of Incorporation.

*The number of enrolled students includes those studying in non-award Open Universities Australia programs.

Curtin 2030: Vision, Values and Strategic Framework

Curtin University is a dynamic, globally connected university dedicated to making a positive impact through teaching, research and engagement. Known for its innovative spirit and future-focused approach, Curtin produces career-ready graduates who are highly sought after and fosters strong, lasting partnerships with students, industry and communities.

At Curtin, learning is immersive and experiential, encouraging critical thinking and ethical leadership among students and alumni worldwide. Guided by strong values, the University champions diversity and inclusion, fostering a deep sense of belonging. Curtin remains committed to reconciliation, actively partnering with First Nations people to amplify their voices and perspectives, shaping new ways of working together.

With a strong focus on sustainability, Curtin is working to create a better world for future generations. The University leverages its network of campuses across the Indian Ocean rim to drive global collaboration, connecting students, staff and partners to tackle pressing challenges facing our communities.

As Curtin looks toward 2030, it will continue to strengthen its research and teaching culture across all disciplines, increasing its global impact. Through the implementation of Curtin 2030, the University is committed to transforming the experience for staff, students, partners and the broader community – working together to make a lasting difference for people and the planet.

PEOPLE

The PEOPLE theme is focused on three strategic objectives:

- **Student Experience**
  Deliver a sector-leading student experience that build aspirations, fosters critical thinking, nurtures ethical leadership and creates life-changing memories.

- **Staff Engagement**
  Cultivate a culture and working environment that provides an inspiring, rewarding and meaningful experience for staff so that they can deliver world-class teaching and a sector-leading student experience.

- **Community Belonging**
  Develop our people to champion diversity, inclusion and belonging to make a difference to our community.

PLANET

The PLANET theme is focused on three strategic objectives:

- **Social Responsibility**
  Strengthen our teaching, research and outreach activities that support the United Nations Sustainable Development Goals to develop a sustainable future for all.

- **Sustainable Operations**
  Prioritise our own operational activities to significantly reduce our carbon footprint, food waste, water usage and help others do the same.

- **Global Impact**
  Strengthen our position around the Indian Ocean Rim by developing further opportunities for learning, research and community engagement at our global campuses.

PARTNERSHIP

The PARTNERSHIP theme is focused on three strategic objectives:

- **First Nations Voices and Perspective**
  Embed voices and perspectives of First Nations peoples at the forefront of our decision-making to create an environment in which everyone thrives.

- **Strong Relationships**
  Create strong, meaningful relationships with external stakeholders, driven by our culture of innovation, thought leadership and action to make a difference.

- **Community Outcomes**
  Create new partnerships that deliver real engagement and outcomes for our local and global communities and enhance opportunities for students.

Governance

The Council is the governing body of the University and its powers are set out in the Curtin University Act 1966 (WA). It has responsibility for the management and control of the property and affairs of the University and may do all such acts and things as it may think best calculated to promote the interest of the University.

There are sixteen members of the Council, and several committees and subcommittees, including:

— Audit, Risk and Compliance Committee

— Data and Digital Governance Committee

— Executive Committee

— Finance Committee

— Legislative Committee

— Nominations Committee

— University Council Health and Safety Committee.

The Academic Board is also a committee of the Council and forms part of the overall governance framework of the University. The Academic Board is responsible to the Council for helping to ensure the academic quality and integrity of the University's operations as an academic institution. The Academic Board is assisted in the performance of its responsibilities by the following sub-committees:

— Academic Board Executive

— Courses Committee

— Global Positioning Committee

— Learning and Student Experience Committee

— Research Committee.

Risk and Compliance

As part of Curtin's governance, Curtin has established a Compliance Management System (CMS) based on the best practice model and procedures contained in International Standards ISO 19600:2014. The CMS is reviewed regularly by the Audit, Risk and Compliance Committee and includes:

— Policy and Procedures

— Compliance training for staff and students

— Compliance Risk Assessment process (including risk identification, analysis, controls and assessing residual risk)

— Reporting, Internal and External Audit Improvement mechanisms

In compliance with the CMS, Curtin has developed and implemented a framework for assessing and managing the risk of modern slavery occurring in our supply chain and operations.

Academic Operations

The University's educational and research programs are spread across five teaching areas. Each teaching area equips its graduates with the knowledge, skills and industry experience needed to excel in their chosen profession:

Faculty of Business and Law

— Curtin Law School

— Curtin Business School

    — School of Accounting, Economics and Finance

    — School of Management and Marketing

Faculty of Health Sciences

— Curtin Medical School

— Curtin School of Nursing

— Curtin School of Allied Health

— Curtin School of Population Health

Faculty of Humanities

— School of Design and the Built Environment

— School of Education

— School of Media, Creative Arts and Social Inquiry

Faculty of Science and Engineering

— School of Civil and Mechanical Engineering

— School of Earth and Planetary Sciences

— School of Electrical Engineering, Computing and Mathematical Sciences

— School of Molecular and Life Sciences

— WA School of Mines: Minerals, Energy and Chemical Engineering

Centre for Aboriginal Studies

— The Centre for Aboriginal Studies offers a range of pathway, undergraduate, postgraduate and research programs which aim to broaden Indigenous knowledge and contribute to Aboriginal communities and their wellbeing.

Other Operations

In 2024, Curtin's administrative functions were organised into the following areas:

– Corporate Services

– Strategy and Planning

– Legal Services

– Financial and Commercial Services

– Research Operations

– Learning and Teaching

– Curtin Global

– People and Culture

– University Advancement

International Operations

Curtin has established a global presence through developing a network of global Curtin campuses in various offshore locations, including Malaysia, Singapore, Dubai, Mauritius and Sri Lanka. The international campuses are operated and run by our partners and supported through the harnessing of Curtin's resources under our One Curtin global strategy.

Curtin locations

Perth

Kent Street,
BENTLEY WA 6102

Postal address:
GPO Box U1987,
PERTH, WA 6845
curtin.edu.au

Perth city

Graduate School of Business
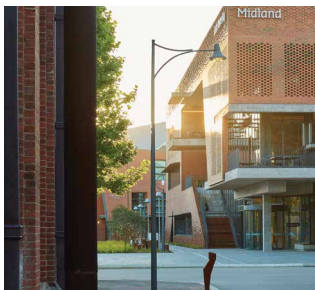78 Murray Street, PERTH, WA 6000

Perth city

Curtin Law School
57 Murray Street, PERTH, WA 6000

Perth city

Curtin St Georges Terrace
137 and 139 St Georges Terrace
PERTH WA 6000

Midland

Curtin Centennial Place
Centennial Place,
MIDLAND, WA 6056

Kalgoorlie

Curtin Kalgoorlie
117 Egan Street,
KALGOORLIE, WA 6430

Malaysia

Curtin Malaysia
CDT 250, Lutong, 98009 Miri,
SARAWAK, MALAYSIA
curtin.edu.my

Mauritius

Curtin Mauritius
Telfair, MOKA,
REPUBLIC OF MAURITIUS
curtinmauritius.ac.mu

Singapore

Curtin Singapore
10 Science Park Road, The
Alpha, Science Park II, Level
3, Unit 03-08, SINGAPORE
117684
curtin.edu.sg

Dubai

Curtin Dubai
Block 11, 4th floor,
Dubai International Academic
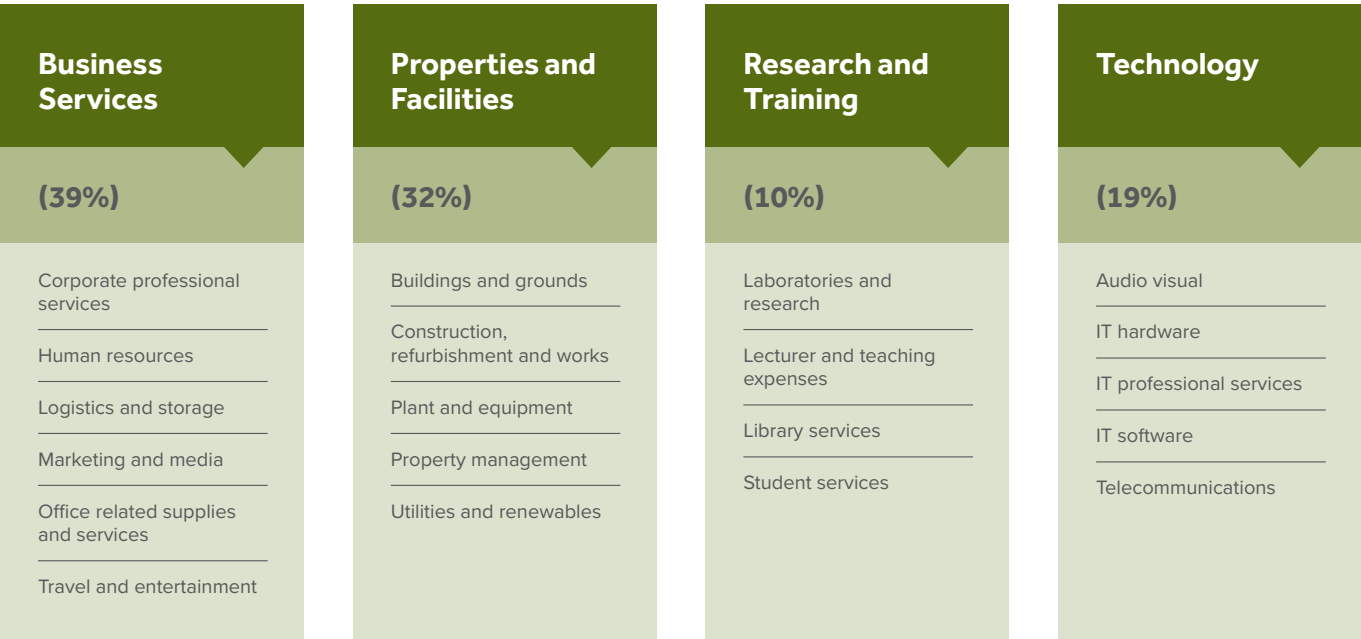City, DUBAI
curtindubai.ac.ae

Sri Lanka

Curtin Colombo
80 Nawam Mawatha
COLOMBO, SRI LANKA
curtincolombo.lk

Criterion 2 (B): Supply Chains

Spend Categories

Curtin's non-payroll expenditure for both operational and capital expenses in 2024 was $428.6 million, across more than 2,700 vendors.

Curtin is a member of the Australian University Procurement Network (AUPN). AUPN is an unincorporated body established for procurement collaboration and consortium buying across the higher education members of Universities Australia. AUPN classifies Curtin's external spend across four key categories as set out in the figure below:

Business Services	Properties and Facilities	Research and Training	Technology
(39%)	**(32%)**	**(10%)**	**(19%)**
Corporate professional services	Buildings and grounds	Laboratories and research	Audio visual
Human resources	Construction, refurbishment and works	Lecturer and teaching expenses	IT hardware
Logistics and storage	Plant and equipment	Library services	IT professional services
Marketing and media	Property management	Student services	IT software
Office related supplies and services	Utilities and renewables		Telecommunications
Travel and entertainment			

2024 Expenditure: Business Services

Curtin spent $167.53 million on general business services, representing 39% of Curtin's overall expenditure. Significant areas of spend in this category included:

- Professional services including financial services, legal services
- Insurance
- Marketing, media and advertising
- HR Services including temporary staff expenses and staff recruitment

2024 Expenditure: Properties and Facilities

Curtin has continued its significant investment in creating a globally competitive campus, through partnerships providing onsite accommodation and construction and refurbishment and delivery of various campus services. Our key areas of expenditure in the Properties and Facilities category, representing $138.07 million or 29% of overall expenditure, included:

- Construction, refurbishment and works
- Property management
- Utilities
- Cleaning

2024 Expenditure: Research and Teaching

Curtin's expenditure in the Research and Teaching category over 2024 equalled $42.02 million, or 10% of overall expenditure. Our key areas of expenditure within this category included:

- Research services
- Laboratory consumables (including gases)
- Academic publications
- Major scientific and laboratory equipment

2024 Expenditure: Technology

Curtin spent $80.99 million, or 19% of overall expenditure, on technology to support learning, teaching, research, and operations. The key areas of expenditure in this category included:

- IT hardware (including end user computing, network hardware and servers)
- Cloud computing services
- Professional IT services
- Software and software as a service
- Telecommunication services and equipment

Location of Suppliers

Approximately 91.4% of Curtin's expenditure is with companies and organisations based in Australia, equating to over 2,220 of Curtin's vendors. The remaining expenditure is broken down over 55 other countries, with the top 10 in 2024 as follows:

1. Australia (91.4%)

2. United States (2.9%)

3. United Kingdom (1.3%)

4. Malaysia (0.6%)

5. India (0.5%)

6. Singapore (0.4%)

7. Ireland (0.4%)

8. Nepal (0.4%)

9. Germany (0.2%)

10. Hong Kong (0.2%)

Sourcing Approach

Curtin has a centralised Strategic Procurement team which maintains a category management sourcing approach to engagement and management of suppliers. This involves aggregating demand across the University to establish long term supply agreements that support its pricing, risk and sustainability goals.

Curtin supply agreements are established through various strategies including:

- Competitive sourcing through closed tenders
- Establishing supply panels for whole of university arrangements
- Preferred supplier arrangements
- Sole source negotiation with suppliers
- Purchasing from various Commonwealth and State supply panels

Collaborating with other universities through various Higher Education buying consortiums, such as AUPN, CAUDIT (Council of Australian University Directors of IT), CAUL (Council of Australian University Librarians) and the University Procurement Hub.

Curtin ensures that a suitable strategy and plan is in place prior to approaching the market which addresses market constraints and Curtin's pricing, risk allocation and sustainability objectives.

Through its Strategic Procurement function, Curtin has implemented a consistent and strategic approach to prequalifying suppliers, running tenders and negotiations, and contracting and engaging with suppliers.

Criterion 3: Modern Slavery Risks

What is Modern Slavery?

Modern slavery describes situations where offenders use coercion, threats or deception to seriously exploit victims and undermine or deprive them of their freedom. While the definition of modern slavery does not include practices like substandard working conditions or underpayment of workers, these practices are also illegal and harmful and may be present in some situations of modern slavery. Additionally, if not addressed, these practices also run the risk of escalating into modern slavery.

Higher Education Sector Wide Approach in Australia

In 2018, higher education providers in Australia identified an opportunity to develop a collaborative approach to addressing the reporting requirements under the Modern Slavery Act 2018. As a first step, a working group was established under AUPN.

The first objective was to map the supply chain for the higher education sector and analyse the modern slavery risks using a consistent and research informed approach. Through this process, a modern slavery risk analysis framework for the sector was developed under the supervision of an Academic Advisory Board established for that purpose. The framework includes a modern slavery risk rating based on category of spend and country of the supplier.

As with previous years, Curtin's modern slavery risk has been mapped using these risk ratings. This provides an overview of the first tier of our supply chain at both a country level and a category level.

Modern Slavery Risk Analysis of our Supply Chain (By Country)

Countries that have a high risk of slavery are typically in poorer regions, with lower socioeconomic outcomes, poor worker protection and high levels government corruption. Nevertheless, it is important to recognise that modern slavery exists in all countries, including developed countries such as Australia, the United States and the United Kingdom.

The top 10 countries with the highest prevalence of modern slavery, as per the Walk Free Global Slavery Index, are:

1. North Korea

2. Eritrea

3. Mauritania

4. Saudi Arabia

5. Türkiye

6. Tajikistan

7. United Arab Emirates

8. Russia

9. Afghanistan

10. Kuwait

Curtin's modern slavery risk analysis of our supply chain based on supplier country demonstrated that only a small proportion of our direct total spend (1.07%) is with suppliers based in countries that are classified as high-risk.

Modern Slavery Risk Analysis of our Supply Chain (By Category)

Curtin's analysis of our modern slavery risk against spend categories demonstrated that in 2024:

- **LOW:** 52% of our spend is on goods and services that have a low risk of modern slavery in their supply chain. These are typically purchased from Australian organisations, with a high level of knowledge workers, or which are locally owned managed and controlled. These categories include utilities, cloud services and insurance.

- **MEDIUM:** 20% of our spend is on goods and services with a medium risk of modern slavery in their supply chain. These include construction, trade services or temporary labour services that are provided by local suppliers subject to Australian labour laws.

- **HIGH:** 19% of Curtin's spend occurs in the categories that have been identified as high risk of having modern slavery in their supply chains. These include catering and construction services that are provided by local suppliers subject to Australian labour laws, however the employees can be lower skilled and from vulnerable backgrounds.

- **VERY HIGH** – 8% of Curtin's spend is in categories that have been identified as very high risk. In general, the spend in this category is primarily on manufactured goods imported into Australia or low skilled services with a low margin, such as cleaning. These purchases have the following factors in common:

  - The supply originates from countries where labour laws are weak or poorly enforced and workers may be subject to long working hours, low pay and poor working conditions.

  - The supply requires the use of raw materials, such as plastics and chemicals, which may be linked to human rights abuses, including forced labour, child labour and human trafficking, where workers are coerced into working against their will, often under the threat of violence or intimidation.

  - The supply relies heavily on sub-contracting, with multiple tiers of suppliers and sub-suppliers, making it difficult to trace the origin of raw materials and labour used in the production process. This lack of transparency creates opportunities for labour exploitation and human rights abuses in the supply chain.

Categories with a Very High Risk of Modern Slavery in our Supply Chain

The following table sets out the types of goods and services Curtin buys in high-risk categories, and provides some detail to further understand the risks for these markets:

Laboratory Equipment and Consumables, including PPE (<3% total spend)	Curtin, as an educational and research institution, acquires a variety of laboratory and instructional materials and supplies, encompassing lab chemicals, gases, glassware, plasticware, lab equipment, life science reagents and medical personal protective equipment (PPE). Among these, laboratory and instructional consumables have one of the highest number of suppliers and are categorised as a high-risk category. The risk of modern slavery within the manufacturing and distribution of lab consumables often mirrors the factors influencing labour exploitation seen in other industrial sectors. Numerous lab consumables, in particular medical PPE, are manufactured in regions with lax or inadequately enforced labour regulations, exposing workers to prolonged work hours, meagre wages and substandard working conditions. Additionally, the urgent need to meet global PPE demand fostered exploitative conditions. The production of lab consumables frequently involves the utilisation of raw materials, such as plastics and chemicals, which have been associated with human rights violations like forced labour, child labour and human trafficking. Workers in these circumstances often face coercion, compelled to work under threats of violence or intimidation. This sector heavily relies on subcontracting, leading to complex supply chains with multiple tiers of suppliers and sub-suppliers. Consequently, tracing the origins of raw materials and labour utilised in the manufacturing process becomes challenging, fostering opportunities for labour exploitation and human rights violations within the supply chain due to a lack of transparency.
Clothing & Apparel (<1% total spend)	Curtin acquires various types of clothing and apparel for diverse purposes, including uniforms for students, faculty, and staff, attire for sports teams, promotional events or volunteering endeavours. Examples of acquired clothing and attire encompass regalia, t-shirts, sweatshirts, hoodies, caps, jackets, bags and accessories such as socks, gloves and ties. The clothing and apparel sector stands out as one of the industries with the highest vulnerability to modern slavery and labour exploitation, owing to its intricate and non-transparent supply chains, dependence on low-wage labour and the pervasive demand for inexpensive, fast fashion. Modern slavery encompasses a spectrum of exploitative practices, including forced labour, child labour, debt bondage and human trafficking. Numerous clothing and attire brands and retailers source their products from developing nations where labour regulations are inadequate or poorly enforced. Workers in these regions may endure prolonged work hours, meagre wages, and substandard working conditions, potentially leading to scenarios of forced labour, debt bondage, and other forms of modern slavery, where individuals are coerced into working against their volition, often under duress or intimidation. Moreover, the industry heavily relies on subcontracting, involving multiple tiers of suppliers and sub-suppliers, complicating efforts to track the origins of raw materials and labour utilised in the manufacturing process. This lack of transparency fosters conditions ripe for the exploitation and mistreatment of vulnerable workers.

IT Hardware (<6% total spend)	Curtin procures IT hardware to facilitate its operations, research and teaching. This includes a broad spectrum of equipment, ranging from audio-visual and multimedia tools to teleconferencing equipment, networks and servers. Additionally, Curtin procures a diverse range of IT devices such as laptops, desktops, tablets, printers, phones and mobiles, along with various accessories like keyboards, mice, cables, data storage devices and headsets, amounting to thousands of items per annum.
	Modern slavery poses a significant and widespread challenge within the global electronics sector and its likelihood is elevated by the intricate and opaque supply chains that underpin the industry. The electronics domain is characterised by significant fragmentation, featuring numerous tiers of suppliers and sub-suppliers, complicating efforts to track the origin of raw materials and labour involved in the manufacturing process. This lack of transparency fosters an environment conducive to the exploitation and mistreatment of vulnerable workers.
	The electronics industry heavily depends on unskilled labour, frequently sourced from developing nations where labour regulations are lax or inadequately enforced. Within these regions, workers may endure extended work hours, paltry wages and substandard working conditions. Such circumstances can precipitate instances of forced labour, debt bondage and other manifestations of modern slavery, wherein individuals are coerced into labour against their volition, often under threats of violence or intimidation.
	The risk of modern slavery in the electronics sector is exacerbated by the utilisation of conflict minerals like tin, tungsten, tantalum and gold, commonly procured from countries characterised by feeble governance structures and heightened levels of conflict. The extraction and trade of these minerals are frequently associated with human rights violations, including forced labour, child labour and exploitation.
Cleaning (<1%)	Curtin engages external suppliers to provide cleaning services, including a broad range of routine cleaning services. These are administered on a regular basis, addressing diverse areas including public teaching spaces, research facilities, offices and communal zones. Additionally, the cleaning regimen incorporates proactive measures targeting high-touch surfaces to mitigate the transmission of germs and viruses.
	Contracts for cleaning services entail modern slavery risks caused by several factors. These include subcontracting arrangements, potentially leading to inadequate scrutiny of labour practices; substandard wages and working conditions, posing risks to the health and well-being of cleaning personnel; language barriers, which may hinder workers' comprehension of their rights and impede their ability to voice concerns; lack of transparency, complicating Curtin's ability to detect and rectify modern slavery risks; and the employment of migrant workers, who may face heightened vulnerability to exploitation due to their immigration status.

Modern Slavery Risks in our Domestic and International Operations

Curtin conducts ongoing evaluation of the potential for modern slavery within our employment and staffing practices and has found no discernible factors that might elevate the risk of modern slavery. Our workforce largely comprises highly skilled individuals whose employment is primarily governed by the terms outlined in Curtin's Enterprise Agreement (2023), which has received approval from the Fair Work Commission.

We do not engage overseas recruitment agencies who might impose recruitment fees or personal and/or property security deposits from our employees. Additionally, we diligently verify the eligibility of all employees to work in Australia.

Our international campuses are managed and operated by our partners, who are required to adhere to all relevant laws, including those pertaining to modern slavery. A comprehensive review of campus agreements was undertaken to confirm compliance. While Curtin holds no direct operational responsibility, we acknowledge the integral role these campuses play in our overarching responsibilities.

We have again assessed the country-specific risks associated with each campus location, as outlined in the provided table. We maintain collaborative efforts with international campus operators to comprehensively assess and address any potential modern slavery risks.

Extracts from Global Slavery Index 2023 (Walk Free Foundation) Report:

Campus Location	Estimated Prevalence of Slavery[1] (per 1,000 population)	Government Response Score[2] (Weighted Score of 1 to 100)	Vulnerability to Modern Slavery[3] (Weighted Score of 1 to 100)
Australia	1.6	67%	7%
Malaysia (Miri)	6.3	45%	37%
Mauritius	1.5	36%	20%
Singapore	2.1	47%	24%
United Arab Emirates (Dubai)	13.4	50%	40%
Sri Lanka	6.5	49%	56%

Source: Global Slavery Index 2023 (Walk Free Foundation) Report
(1)   Table 26: Estimated Prevalence and Number of People in Modern Slavery, By Country
(2)   Tables 6, 13 & 18: Government Response Score, By Country and Milestone
(3)   Table 7, 12 & 17: Level of Vulnerability to Modern Slavery, By Country

Modern Slavery Risks for our Students

Curtin assessed the potential for modern slavery among our domestic student body, finding no identifiable traits that might increase the risk.

Similarly, we evaluated the risk of modern slavery for our international students. It's worth noting that within the sector, some international students are recruited via overseas agencies, which can pose modern slavery risks. These risks may arise from various factors such as exorbitant fees charged by recruitment agencies or financial support provided, potentially leading students into situations of debt bondage or exploitation, including substandard working conditions, extended work hours beyond agreements or wages lower than promised.

Criterion 4: Actions Taken to Assess and Address Risks

Collaborative Approach across Australian Higher Education Sector

Curtin has worked with the Australian and international higher education industry (through the collaboration with AUPN) to ensure we develop a best practice research-informed approach to maximise our impact on reducing modern slavery as an industry. AUPN currently has 41 member institutions (38 Australian and three New Zealand universities) working together to improve both procurement practices and the skills of procurement professionals in the higher education sector. Since 2019, the Modern Slavery Working Group has been working under AUPN to develop an aligned set of objectives and a program of activities to respond to the passing of the Modern Slavery Act 2018.

 The key workstreams under the AUPN program include:

- **Technology Enablement Workstream:** This workstream included selecting and enabling a collaboration platform (FRDM) to share supply chain analysis, due diligence, media alerts and risks across the higher education sector and its suppliers. It enables the sector to drill down through the multiple tiers of its supply chain over time and share the results.

- **Framework and Documentation Workstream:** This workstream provided various procurement and contracting templates, risk analysis, policies, processes and guidelines to enable the sector to implement governance in a consistent way, to enable collaboration and reduce rework for the sector and its suppliers.

- **Data Analysis Workstream:** This workstream analysed the supply chain data across the sector providing a common categorisation and risk analysis framework.

- **Engagement and Communications:** This workstream developed an online portal for universities to share information and included regular forums and updates to communicate progress and feedback on issues. The forum has also been used to improve communication on modern slavery issues between procurement professionals in the sector and to accelerate progress through collaboration.

- **Governance:** this workstream established a working group to create a roadmap, make decisions and allocate resources to the sector wide program. It included establishment of an Academic Advisory Board with the country's leading academics in modern slavery to ensure its approach was best practice and research informed.

In 2024, the key achievements of the program included:

- Continued updates and utilisation of the AUPN Modern Slavery reporting platform and engagement of ArcBlue for Modern Slavery Risk dashboard updates.

- Addressing the risks in our international student cohort through engagement, education and collaborating in research.

- Engagement with community and industry including the ACRATH, Cleaning Accountability Framework, Red Cross, the Migrant Justice institute and Electronics Watch.

Spotlight on Collaborative Action: Supply Chain Mapping Technology

AUPN has collaborated with ArcBlue to introduce a comprehensive technology solution aimed at combating modern slavery within our supply chains. ArcBlue, a subsidiary of Bain, is the AUPN partner and a leading procurement strategy firm specialising in university supply chains. This partnership empowers individual universities, as well as the sector as a whole, to make well-informed decisions and take proactive steps to mitigate modern slavery risks.

Throughout 2024, 33 participating universities submitted supplier data, covering more than $12.8 billion of spend and 91,000 suppliers were assessed for modern slavery risks. The 2024 dashboard was published in February 2025, providing real-time insights and actionable intelligence.

In previous years, the sector used FRDM platform for supply chain analysis, however after feedback from the universities, the sector migrated to the ArcBlue tool in 2024.

Spotlight on Curtin Action: IT Hardware

In 2020, Curtin identified that a key risk of modern slavery in our supply chain was in the purchase of technology hardware, including servers, network equipment, end user computing and telephones. In 2021, Curtin became the first organisation in Australia to join Electronics Watch. Currently, more than 1500 organisations in Australia and Europe are affiliated with Electronics Watch.

The mission of Electronics Watch is to enable organisations to collaborate with local agencies that are monitoring local electronics manufacturing and production workforces in high-risk regions. By coordinating independent monitoring and remediation, Electronics Watch supports its affiliates to establish supply chain transparency for procured product models which protects the rights of workers in the supply chain. Factory disclosures for final assembly (Tier 1) and component production (Tier 2) give affiliates details on location of factories and allow Electronics Watch to deliver a general risk assessment. Electronics Watch also monitors selected factories to document potential risk and rights violations.

Monitoring is implemented by monitoring partners – local civil society organisations – using the Electronics Watch Worker-Driven Monitoring Methodology. Guided by workers' rights and priorities, this methodology delivers high quality data that enables Electronics Watch to write a monitoring report on rights violations and risks for a specific factory.

To start the remediation process, the monitoring report is shared with the manufacturer and the brand(s) linked to the specific factory. Electronic Watch works with companies and the Responsible Business Alliance to improve compliance with relevant labour regulation and internationally recognised codes and worker rights standards. Since 2021 Electronics Watch has a formalised process that takes place after a monitoring report has been shared with the industry. Throughout the process, affiliates have full transparency on process, methods, data and impact.

In 2024, Curtin continued working with its technology vendors to introduce the relevant contractual framework required for Electronics Watch to implement their process for those vendors. Curtin has commenced providing data and reporting to Electronics Watch on purchases within this category and Curtin is working with Electronics Watch to refine the validation and remediation process.

Furthermore, Curtin aided Electronics Watch through providing information to a working group that aims to provide greater supply chain transparency.

Spotlight on Curtin Action: Laboratory and Medical Consumables

Throughout 2024, Curtin continued to manage the common contract framework for engagement with laboratory consumable suppliers. These contracts include standard clauses, in line with AUPN recommendations, which enable supply chain transparency and consequently reduce the risk of modern slavery in these supply chains.

We have also continued our use of an e-marketplace for the acquisition of these goods, facilitating a curated selection of supplier catalogues exclusively accessible to our faculty and students. This oversight of the e-marketplace involves careful management of product additions to the catalogue, ensuring transparent approval processes and timely removal of items as needed.

During 2024, AUPN established a "Medical Equipment and Laboratory Suppliers" risk category working group and 72 suppliers were selected for a deeper due diligence process. 47 suppliers completed the surveys, covering 22% of spend across the sector. After reviewing the results, five suppliers were approached to participate in pilot collaborative remediation plans.

Spotlight on Curtin Action: Cleaning

Throughout 2024, Curtin has continued to integrate the evaluation and mitigation of modern slavery risks into contract reviews for current cleaning suppliers. In 2024, this contract review process also began to include a review of salary rates paid to employed cleaners, in comparison to newly updated award rates. Curtin has subsequently built in, where necessary, updates to wages as part of any variation or agreement with cleaning suppliers.

Furthermore, within all procurement planning and strategic processes, modern slavery risks are explicitly identified, with corresponding requirements incorporated into the request for tender, contract development and supplier evaluation phases.

Spotlight on Curtin Action: Responsible Investment

The University is dedicated to responsible investing, which encompasses the management of risks and opportunities associated with environmental, social and governance (ESG) matters, and incorporates responsible investing principles into its overarching investment strategy. As part of this commitment, the University continues to actively track various metrics for the managed funds in which it invests, including ESG ratings, carbon footprints, proxy voting records and evaluations of compliance with the UN Principles for Responsible Investment.

Spotlight on Curtin Action: Support for International Students

To address the risk of exploitation and slavery amongst international students by recruitment agencies Curtin undertakes ongoing reviews of current agency contracts as part of a continuous improvement process aimed at meeting Curtin's requirements, including those related to modern slavery.

Given that international students in Australia may possess limited knowledge of their rights and protections under Australian law, coupled with potential fears of repercussions such as deportation or visa-related penalties for speaking out, proactive measures are taken to educate students about their rights within the regulatory framework.

These proactive measures include the introduction of a section in the International Student Orientation sessions, which contain information about employment rights and conditions in Australia. This session also provides resources for students to access, as needed, with further details around student and workers' rights, alongside contact information.

As part of the AUPN program, together with the Red Cross and the Migrant Justice Institute (MJI), various university representatives formed a steering committee to address international student worker exploitation. During 2024, a National Temporary Migrant Survey was initiated and circulated to international students across Australia including Curtin, to create transparency regarding any exploitation and slavery risks that are faced by this cohort. The results of the survey will be released in 2025.

AUPN also collaborated with the Red Cross on the development of the Work Right Hub. The Work Right Hub (WRH) is an Australian digital platform aimed at preventing and addressing criminal labour exploitation by informing and empowering workers and frontline responders about the risks of exploitation and the avenues of support. A steering committee was formed by six universities, and a consultation process was performed with 30 student facing staff and 30 international students to customise the WRH resources. The international student WRH resources were published in September 2024.

Spotlight on Curtin Action: Training for all students

AUPN collaborated with ACRATH (Australian Catholic Religious Against Trafficking in Humans) on the "Education for Change" initiative. The program developed six modules of online training aimed to educate university students on understanding and identifying modern slavery across various industries, to be delivered as micro-credentials.

The program has six online modules that are 30 minutes each with a downloadable credential / certificate. Universities have been invited to include the micro-credentials in their course material.

Criterion 5: Assessment of Effectiveness

Effectiveness of University Sector-Wide Collaboration

Evidence from the UK and Europe demonstrates that cooperation within the university sector proves effective in mitigating the risk of modern slavery. By facilitating the exchange of knowledge and resources, collaborative efforts empower universities to collectively tackle shared obstacles and address modern slavery challenges more effectively.

The key area of focus for collaboration across the Australian university sector over the last four years has been through the development of data analytics and tools to enable transparency for modern slavery risks in university supply chains. Australian universities are working together to develop common approaches to supply chain due diligence and to share information about suppliers and supply chain risks. The primary example of this has been through the implementation of and continued reporting to the AUPN Modern Slavery reporting tool.

Collaboration has also been effective in engaging with other industry associations, such as Electronics Watch. Through working together, universities are becoming more able to leverage a collective voice and influence, to drive change and promote best practices in addressing modern slavery.

Effectiveness of Curtin's Approach

In 2024, Curtin's commitment to managing and proactively addressing modern slavery risks in its supply chain has continued to yield significant progress and achievements.

Building upon the groundwork laid in previous years, Curtin has further refined its approach to modern slavery risk management. Through a comprehensive risk management and compliance framework, Curtin conducts thorough analysis to identify and prioritise spending categories vulnerable to modern slavery risks, aligning with industry standards.

An essential aspect of Curtin's strategy involves integrating measures to combat modern slavery into its standard contracting and procurement methodologies. This proactive approach has resulted in a notable transition of suppliers within high-risk categories to contracts compliant with updated template requirements, demonstrating Curtin's commitment to ethical sourcing practices.

Specifically, in high-risk categories such as IT hardware, Curtin has proactively engaged with organisations like Electronics Watch, demonstrating its dedication to adopting best practices and staying ahead of industry standards to mitigate modern slavery risks effectively.

Furthermore, Curtin has expanded its efforts to address modern slavery risks across various sectors, including cleaning and lab consumables. By incorporating assessments of modern slavery risks and mitigation strategies into contract reviews for existing suppliers, Curtin ensures that ethical considerations are integrated into its procurement processes.

Criterion 6: Owned and Controlled Entities

Curtin does not own or control any other entities.

Criterion 7: Other

Curtin recognises the importance of continually developing our reporting and remediation framework to measure the effectiveness of our approach in addressing modern slavery risks and enabling a program of continuous improvement. Curtin will continue to leverage the benefits of a central Strategic Procurement function to implement structural improvements to our supplier engagement framework as well as leveraging the sector wide collaboration to identify, monitor and mitigate risk as well as implement remediation strategies as required.

For our international campuses, we will maintain collaborative efforts with the campus operators to comprehensively assess and address any potential modern slavery risks.

Curtin will continue to enhance our grievance reporting mechanisms and remediation processes, ensuring there are robust and identifiable mechanisms for stakeholders to report instances, or suspected instances, of exploitation or abuse. Improving grievance reporting channels will empower stakeholders to voice concerns and seek assistance when needed.

Curtin University

Curtin University acknowledges all First Nations of this place we call Australia and recognises the many nations who have looked after Country for more than 60,000 years.

We are honoured and grateful for the privilege to maintain campuses operating in Boorloo (Perth) and Karlkurla (Kalgoorlie) in Australia. We pay our respects to Elders past and present as Custodians and Owners of these lands. We recognise their deep knowledge and their cultural, spiritual and educational practices, and aspire to learn and teach in partnership with them.

Curtin also acknowledges First Nations peoples connected with our global campuses. We are committed to working in partnership with all Custodians and Owners to strengthen and embed First Nations' voices and perspectives in our decision-making, now and into the future.

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