



WESTERN SYDNEY
UNIVERSITY

MODERN SLAVERY STATEMENT

JANUARY 2024–DECEMBER 2024





acknowledgement of country

With respect for Aboriginal cultural protocol and out of recognition that its campuses occupy their traditional lands, Western Sydney University acknowledges the Darug, Eora, Dharawal (also referred to as Tharawal) and Wiradjuri peoples and thanks them for their support of its work in their lands (Greater Western Sydney and beyond).

We pay our respects to their Elders past and present and commit to ensuring Western Sydney University operates in a fair and ethical manner that respects First Nations peoples' rights and interests.

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REPORTING MODERN SLAVERY CONCERNS

The University has safe reporting channels you can use to raise concerns about modern slavery and seek support. Contact the police on **000** in an emergency. Concerns about modern slavery can also be raised with the Office of the New South Wales Anti-Slavery Commissioner by calling **1800 FREEDOM (1800 3733366)** or emailing antislavery@dcj.nsw.gov.au

STUDENT WELLBEING AND COUNSELLING SERVICES
counselling@westernsydney.edu.au
or **1300 668 370**

THE JUSTICE CLINIC
All Western students can access a free legal advice and referral service via the Justice Clinic
studentlegalservices@westernsydney.edu.au or **02 9685 4788**

WHISTLEBLOWING POLICY
Staff and Students can report concerns under the Whistleblowing Policy. All reports and any associated investigations are treated confidentially.

about this statement

This Modern Slavery Statement (the Statement) has been prepared by Western Sydney University (Western) to meet the requirements of the *Modern Slavery Act 2018* (Cth) (MSA) for the period 01 January 2024 to 31 December 2024 (the reporting period).

Serving as our fifth statement, it is issued on behalf of Western Sydney University (ABN 53 014 069 881), which is the sole reporting entity for the purposes of the MSA. The statement also includes information where relevant about Western Sydney University's affiliated entities (listed below). References to "we", "us", "our", "Western" or "the University" in this statement are intended to encompass both Western Sydney University and its affiliated entities, except where information is identified as relevant to specific entities.

- Whitlam Institute within Western Sydney University Limited (ABN/ACN 50 100 342 309)
- The Trustee for Whitlam Institute within Western Sydney University Trust (ABN/ACN 42 247 216 279)
- Western Sydney University Enterprises Pty Limited trading as Western Sydney University The College (ABN/ACN 44 003 474 468)
- Western Sydney University Early Learning Limited (ABN/ACN 39 155 993 445)

- Western Growth Developments (Innovation Hub Parramatta) Pty Limited (ABN/ACN 36 626 590 029)
- Western Growth Developments (Westmead) Pty Limited (ABN/ACN 93 625 406 411)
- Western Sydney University International College Pty Limited trading as Western Sydney University International College (International College) (ABN/ACN 25 604 796 189)
- Yayasan Western Sydney University Indonesia (Western Sydney University Indonesia Foundation)

This statement was developed through consultation with the owned or controlled entities (affiliated entities) listed above. The consultation process is outlined on page 29. As a single statement made by one reporting entity, the MSA's requirement to describe consultation with other reporting entities does not apply.

This Modern Slavery Statement was subsequently approved in May 2025 by the Board of Trustees of Western Sydney University, as the peak governing body of the University. The statement has been signed by Professor Jennifer Westacott AO, Chancellor as the Chair of the Board of Trustees and Distinguished Professor George Williams AO, Vice-Chancellor and University President.



message from our chancellor and vice-chancellor



We are pleased to present Western Sydney University's 2024 Modern Slavery Statement. As a university, our mission is deeply focused on serving our students and our community.

We strive for student success, impactful research, and stronger Western Sydney communities. Our efforts to address modern slavery risks are a key part of our people-centred approach and reflect our broader commitment to driving positive social, economic and environmental outcomes. Like all organisations we recognise we may be exposed to a diverse range of potential modern slavery risks – whether through the goods and services we procure, our third-party service providers, research partnerships, or investment activities. We also acknowledge the unique vulnerabilities faced by our international students who may be at greater risk of exploitation by third parties and in 2024, we took proactive steps to better understand and address these risks. Guided by our Modern Slavery Working Group, we took significant steps to strengthen our modern slavery response in 2024. Key actions included:

- Development of an interactive modern slavery e-learning module for relevant staff and all students.
- Development of a draft Social Procurement Charter which reinforces our commitment to ethical sourcing and will strengthen efforts to identify and address modern slavery risks across our supply chains.
- Engaging with our international student community to better understand potential risk exposures, including participation in the 2024 National Temporary Migrant Survey.

- Providing ongoing pro bono legal services to victim-survivors of modern slavery through Western's Justice Clinic, which also released a practical guide to supporting individuals affected by domestic violence, sexual assault, and modern slavery in New South Wales.
- Commencing the development of Western's first Human Rights Policy.

We were also honoured to host the NSW Anti-Slavery Commissioner, Dr James Cockayne at our Parramatta South Campus, where he met with senior leaders and members of our Modern Slavery Working Group.

Looking ahead, we remain committed to strengthening our response to modern slavery. In 2025, our key priorities include the finalising our Human Rights Policy which aligns with our commitment to implement the United Nations Guiding Principles on Business and Human Rights, operationalising our Social Procurement Framework, and rolling out the new e-learning module across the University.

Together, we are advancing a culture of accountability, care and respect, that reflects our values and deepens our commitment to human rights across Western's operations and supply chains.

Professor Jennifer Westacott AO
Chancellor, Western Sydney University

Distinguished Professor George Williams AO
Vice-Chancellor and President, Western Sydney University

our 2024 progress and future priorities



OUR COMMITMENT

OUR PROGRESS

Policies and governance

Develop a Social Procurement Charter embedding key modern slavery considerations.

We developed a draft Social Procurement Charter, which underwent consultation with relevant internal stakeholders and external industry experts to ensure its relevance, effectiveness, and alignment with best practices. The Charter will be circulated for wider feedback with plans to implement in the later part of 2025.



Develop a Human Rights Policy.

We commenced the development of a draft Human Rights Policy, in alignment with our plans to implement the United Nation's Guiding Principles on Business and Human Rights (UNGPs). The draft was developed in partnership with internal stakeholders across our Environmental Sustainability team, General Counsel, and the Justice Clinic. The draft policy is scheduled for wider circulation and feedback in 2025.



Supplier due diligence

Further strengthen our approach to monitoring and managing high risk suppliers and industries.

A dedicated resource for Contracts and Supplier Relationship Management has been identified within the Procurement team, once recruited this resource will support our work in managing modern slavery risks across the vendor lifecycle.



Develop our Supplier Risk Heat Map to gain insights into our supply chain and potential risks.

We further refined and continued to apply our Supplier Risk Heat Map over 2024 to assist us with managing risks across our supply chain. Following the implementation of a procurement system in 2025/2026, we will deep dive into the risks identified in our Heat Map and set clear KPI's for improvement across our tier one suppliers.



Roll out supplier assessment questionnaires to existing and new suppliers as part of our supplier screening process.

We participated in the Australian Universities Procurement Network (AUPN) supplier assessment questionnaire (SAQ) pilot and established our own SAQ's in 2024. Following the implementation of a procurement system in 2025/2026 we will formalise our SAQ and utilise new supplier insights to inform our procurement decisions.



Update tender documents and roll out modern slavery requirements and questionnaires across all tenders

We strengthened our modern slavery evaluation processes in market activities, with a particular focus on integrating them into activities for our substantial procurement initiatives.



OUR COMMITMENT

OUR PROGRESS

Training and awareness raising

Develop framework and awareness tools to provide specific and targeted support to international students who have been identified as a vulnerable group for modern slavery across the sector.

We commenced development of an International Student Survey to assess the recruitment experience of international students and better understand their awareness of their rights in Australia and the support mechanisms available to them. Once released in 2025, the survey findings will help inform and strengthen our safety measures.



The Working Group held discussions on strengthening supplier due diligence processes related to student placement arrangements, with a focus on identifying and addressing potential modern slavery risks. Enhancing these due diligence practices remains a key priority for 2025.

Roll out and embed mandatory modern slavery training across University staff and contractors.

We developed tailored modern slavery e-learning modules for relevant staff and all students. The modules will be fully implemented over 2025



Extend information sharing and awareness communications for University staff responsible for managing high-risk categories and contractual operations within our supply chain.

We continued to drive information and raise awareness of modern slavery risks across key business functions within the University, including through internal procurement forums and meetings. The implementation of our Social Procurement Charter will further support these efforts and continue to drive engagement in 2025.



Raise awareness and accessibility of grievance and whistleblowing mechanisms across University staff, students and contractors.

Our new modern slavery e-learning modules include information about the University's grievance and whistleblowing mechanisms, including how to report actual or suspected instances of modern slavery. In 2025, we plan to further promote support services and reporting channels through the University's internal social platform Viva Engage.



Industry and stakeholder collaboration

Ongoing collaboration with the AUPN to strengthen modern slavery responses to risks across the sector.

We participated in the AUPN's SAQ pilot and continued with initiatives led and supported by the AUPN, including the 2024 National Temporary Migrant Work Survey from the Migrant Justice Institute. AUPN meetings also included engagement with civil society groups who work with potentially affected stakeholders, which may include international students. This included the Australian Red Cross and the Australian Catholic Religious Against Trafficking in Humans, this valuable peer collaboration will continue into 2025.



Partner and collaborate with suppliers to strengthen their response and our response to risks of modern slavery.

This remains an ongoing area of focus for the University. The implementation of our Social Procurement Charter, the formalisation of our Supplier Assessment Questionnaires (SAQs), and the introduction of our new procurement system will collectively strengthen our control measures, generate more valuable insights, and streamline our supplier due diligence processes. These developments will also enhance supplier collaboration and improve our ability to capture and manage information that supports our social procurement objectives.






SIX
MASSALL STREET



about western sydney university

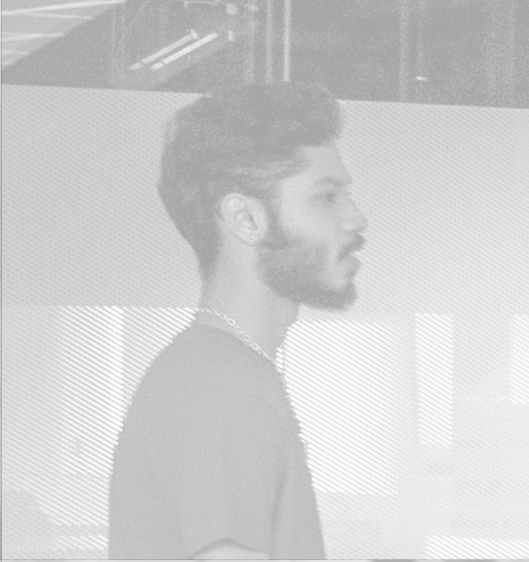


Western Sydney University is a multi-campus, research-led university established under the *Western Sydney University Act 1997*. We were ranked the world's number one university for sustainability in the 2024 Times Higher Education Impact Rankings.

The University is governed by a Board of Trustees chaired by the Chancellor. The Vice-Chancellor is the University President and CEO, responsible for managing all academic and administrative areas of the University.

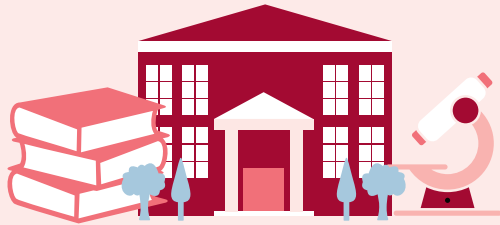
We have integrated sites throughout Western Sydney, including Parramatta, Penrith, Campbelltown, Bankstown, Richmond and Liverpool. In addition, we have an international campus in Surabaya and an offshore delivery location in Vietnam.

Further information about our affiliated entities is set out in Appendix 1.

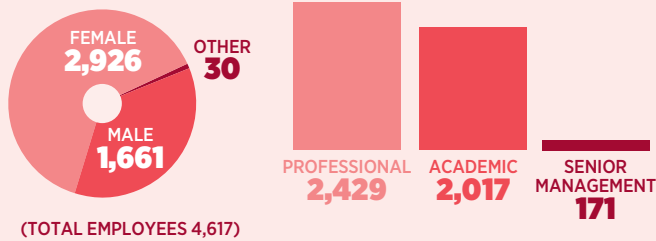


our operations at a glance

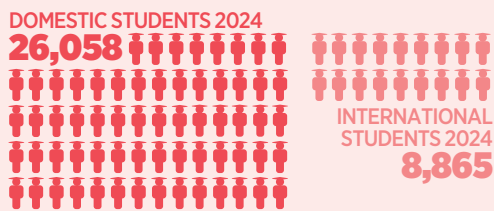
13 CAMPUSES



EMPLOYEES



NOTABLE WORLD PERFORMANCE IN SDG CATEGORIES



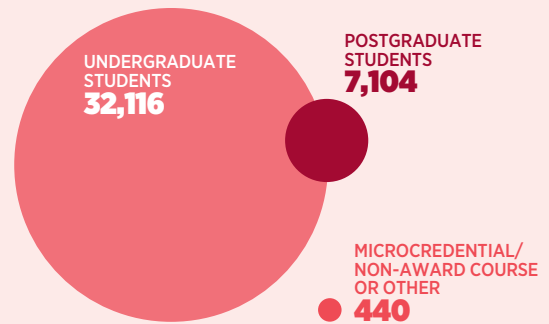
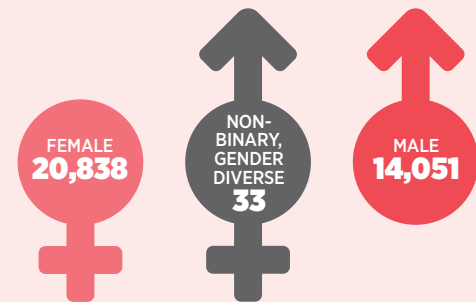
OVER 400 COURSES



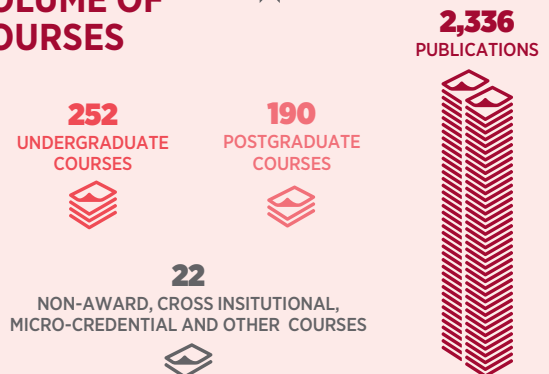
OFFERED ACROSS 9 SCHOOLS



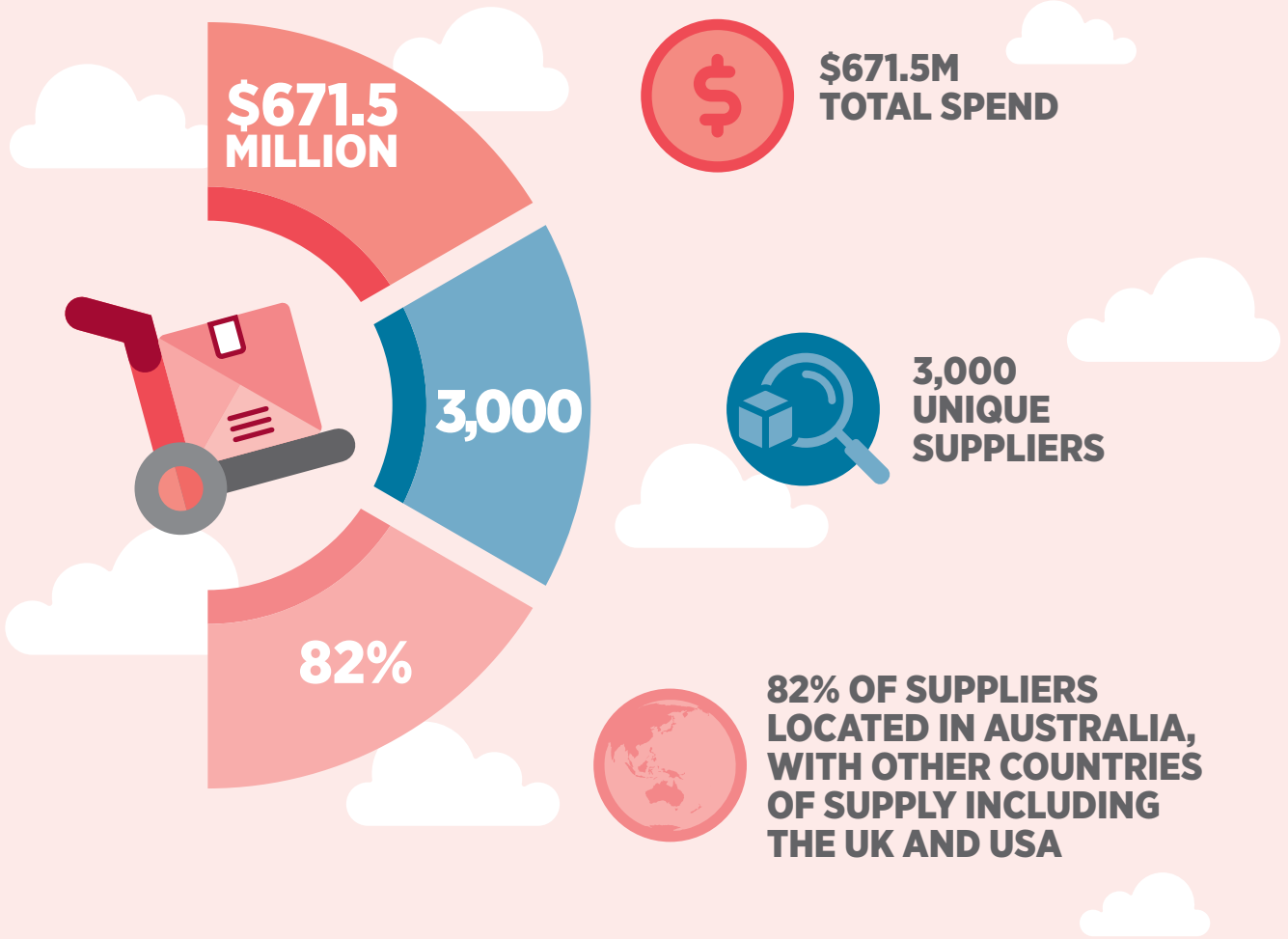
STUDENT HEADCOUNT BY GENDER



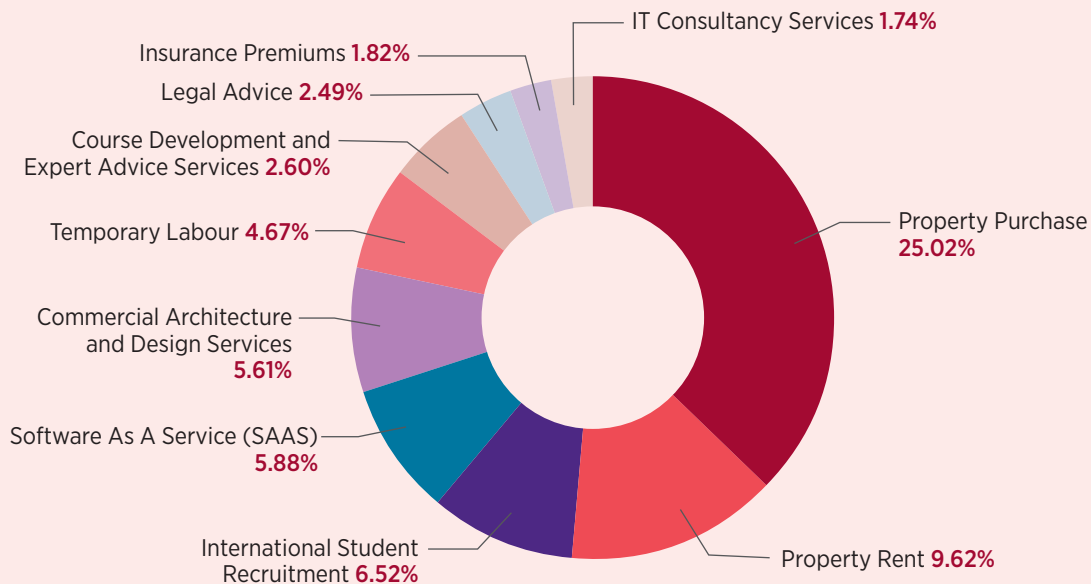
VOLUME OF COURSES



our supply chain at a glance



TOP TEN CATEGORY SPENDS



identifying our modern slavery risks

Universities can be exposed to a complex range of modern slavery risks. This reflects the breadth and diversity of our activities and supply chain.

MODERN SLAVERY RISKS IN OUR OPERATIONS

While we assess that the most severe modern slavery risks are likely to arise within our supply chains, we acknowledge that certain areas of our operations may also carry inherent risks. These operational risk areas are outlined over the following pages.

It is important to note that our relationship to these risks will vary depending on the specific context. For instance, in cases involving the exploitation of international students, we may be directly linked to the harm through our operations or partnerships. In some circumstances, we could also contribute to the risk, particularly if we do not take appropriate action

in response to reports or indicators of exploitation. We do not consider that our direct engagement of workers presents modern slavery risks. Our academic and professional staff are engaged in accordance with relevant workplace laws and are free to bargain collectively, join unions, and leave their employment without material restrictions. Additionally, all staff have access to reporting channels to enable them to safely raise concerns, including our whistleblower framework. Our policy framework and employee training program also support us to maintain a safe and respectful workplace, including by addressing issues such as discrimination and harassment that may create an enabling environment for modern slavery.



¹ The UNGPs are the global authoritative standard that set out expectations for businesses around respecting human rights.

HOW WE APPLY THE UNGPs CONTINUUM OF INVOLVEMENT

CAUSE

An entity is considered to cause modern slavery where its own operations or activities directly result in modern slavery practices. This may mean employment practices that lead to forced labour or exploitative conditions within its workforce.

CONTRIBUTE

An entity contributes to modern slavery when its actions or business practices enable, encourage, or facilitate modern slavery, even if it does not directly cause the harm. This can occur, for example, through poor purchasing practices, unrealistic delivery timeframes, or lack of oversight that contributes to exploitative conditions in a supplier's operations.

DIRECTLY LINKED

An entity is directly linked to modern slavery when the harm is caused by a business relationship, such as a supplier, contractor, or other third party, through its products, services, or operations, even if the entity has not caused or contributed to the harm. While the link may be indirect, the organisation still holds a responsibility to take reasonable steps to address the risk.

HOW WE ACCESS OUR MODERN SLAVERY RISKS

INFORMATION SOURCES

- Global Slavery Index and other Resources
- Ibis World Industry Research
- Peer Networks
- Australian Government and NSW Anti-Slavery Commissioner
- Human Rights Organisations
- Relevant Media Sources

OUR UNDERSTANDING OF OUR RISK PROFILE

INCLUDING POTENTIAL LEVEL OF INVOLVEMENT AS PER THE UNGPs

KEY RISK AREAS FOR OUR OPERATIONS

KEY RISK AREAS FOR OUR SUPPLY CHAINS

identifying our modern slavery risks (continued)

POTENTIAL HIGH RISK AREA: INTERNATIONAL STUDENTS

International students are recognised as a group who may be vulnerable to modern slavery and other forms of exploitation. The New South Wales (NSW) Anti-Slavery Commissioner has also raised the vulnerability of international students to modern slavery as a ‘significant issue’ for universities under section 31(1)(a) of the NSW Modern Slavery Act 2018. These risks can occur in several contexts.

In some circumstances, international students may be subject to unethical or fraudulent practices by international recruiters or scammers posing as recruitment agents. This may include situations of debt bondage (a form of modern slavery), where students are coerced or deceived into paying excessive fees to obtain visas or to lodge fake enrolment applications. We have implemented several controls to protect the integrity of our offshore student recruitment processes, including providing information to students about support services, including modern slavery clauses in our International Student Recruitment Agreements and engaging with students about their experiences through a tailored survey.

We focus on providing safe environments for all our students, including when they undertake third party work placements. However, international students may be vulnerable to exploitation when engaging in work outside of their course of study, such as casual or part time work. In Australia, international may seek positions in sectors where there are higher risks of modern slavery, such as hospitality. They may also be unsure of their workplace rights and how to safely raise concerns.

The development of the International Student Survey will play a key role in capturing insights into students’ experiences during the recruitment process, including their interactions with education agents. The survey will also assess students’ awareness of their rights in Australia, identify whether they require additional support, and provide information on how to access these support services. In addition, the rollout of the dedicated Student Modern Slavery Training module in 2025 will further support prevention efforts by equipping students with knowledge of modern slavery, their rights, and the mechanisms available for seeking help or reporting concerns.

POTENTIAL LOW RISK AREA: WORKERS UNDER THE AGE OF EIGHTEEN

Workers under the age of eighteen may be especially vulnerable to adverse human rights impacts. This can include where young workers are exposed to hazardous situations, which can constitute the worst forms of child labour (a form of modern slavery).

Western may engage with trainees under the age of eighteen through The College’s work as a Registered Training Organisation (RTO).

The College, has the responsibility of the development and delivery of the Training Plan, monitoring the trainee’s progress in their formal training, and providing necessary support. Ensuring safe and fair working conditions is primarily the responsibility of the employer, with Apprentice Connect Australia Providers (ACAPs) facilitating the sign-up process, explaining roles and responsibilities, and offering ongoing support to both employers and trainees.

To ensure the workplace is safe for training delivery, The College conducts an initial site visit or holds a virtual meeting to confirm that the workplace is suitable for carrying out the tasks associated with the qualification. If The College becomes aware of any issues related to workplace exploitation or unsafe conditions, it takes appropriate follow up action and refers concerns to the relevant authorities such as Training Services NSW or ACAPs that signed up the trainee or apprentice. The College has committed to implement the following risk control measures in 2025:

- 1. Wellbeing and Safety Checks** – These will be integrated into existing fortnightly one-on-one student support sessions.
- 2. Training and Awareness** – All teachers will receive a fact sheet outlining key responsibilities when working with students under 18.
- 3. Incident Reporting** – A clear escalation process will be established to ensure concerns are reported and addressed promptly and appropriately.
- 4. Parents/Guardian Communication** – Protocols will be established for engaging parents/guardians where it is appropriate and necessary to do so.

Western also engages with trainees who may be under the age of eighteen through the University's Ignite Indigenous Traineeship Program. This is an internship initiative for anyone identifying as Aboriginal and/ or Torres Strait Islander and currently targets school leavers. The program is delivered by the Office of the Deputy Vice-Chancellor Indigenous Leadership and is offered as a one-year fixed term of employment in combination with enrolment into a Certificate III in Business Administration traineeship provided by The College. As a risk control measure, interns are provided training, induction sessions, access to Indigenous staff wellbeing programs and mentoring to support their ongoing safety and wellbeing during the Ignite Program.

POTENTIAL LOW RISK AREA: INVESTMENTS

The University has an investment portfolio which is managed by an external fund manager which acts in accordance with its own modern slavery objectives. The fund manager also acts on behalf of the University to ensure that it manages the investment portfolio within the ESG framework set by the University. Outcomes and compliance to the framework is reported to the University's Finance and Investment Committee on an annual basis.

The University is committed to responsible investment and works closely with its fund manager to help ensure environmental, social and governance risks are integrated into the development and implementation of the University's investment portfolios (see page 25 for further details).

POTENTIAL LOW RISK AREA: LABOUR HIRE AND TEMPORARY WORKFORCE

We recognise there are modern slavery risks associated with the use of labour hire and temporary workers in Australia. To mitigate these risks, Western utilises the BuyNSW Talent Acquisition Scheme for temporary workforce and labour hire. This scheme offers a list of prequalified suppliers to source, assess and select talent for executive and non-executive roles.

Using the scheme supports us to undertake the procurement of talent ethically, transparently, and with safeguards in place for potential employees. It also helps reduce risks associated with worker exploitation, non-compliance, and unfair employment conditions, while ensuring that providers adhere to modern slavery regulations and ethical hiring practices.

POTENTIAL LOW RISK AREA: RESEARCH PARTNERSHIPS AND CLINICAL TRIALS

Western is committed to championing research that aligns with the United Nations Sustainable Development Goals (SDGs). Our global research footprint, including partnerships with external bodies, helps to drive this work. We recognise that in some contexts, external partnerships may pose modern slavery risks, including in situations where this may limit our visibility and control over how modern slavery controls are implemented. As outlined on page 23, we take a range of steps to manage risks in this space.

In addition to broader research partnerships, another potential area of modern slavery risk for universities can include clinical trials. While we recognise clinical trials may present modern slavery and broader human rights risks in certain circumstances (such as around identification of participants), we consider modern slavery risks in our clinical trials to be low for a range of reasons.

Importantly, our clinical trials are reviewed by either the University Human Research Ethics Committee (HREC) in line with the National Statement on Ethical Conduct in Human Research, or an external ethics committee. This includes consideration of any potential risks associated with any outsourced components, such as identifying participants. The National Statement on Ethical Conduct in Human Research explicitly addresses coercion and pressure and the requirement and importance of voluntary consent of participants. Research participants are also provided with a Participant Information Sheet, which outlines the project details, how the trial will be conducted and contact information for raising concerns or complaints.

Most clinical trials conducted by University staff are also undertaken in public health settings, such as hospitals and it is a requirement for all clinical trials that a University staff member be appointed as a Chief Investigator who is accountable for the trial's conduct.

identifying our modern slavery risks (continued)

SPOTLIGHT: DECEPTIVE RECRUITMENT OF INTERNATIONAL STUDENTS

Deceptive recruitment refers to the recruitment of individuals for labour or services under false pretences.

In July 2023, several media outlets reported that users of Chinese social media apps were allegedly being misled with false promises of permanent residency in Australia. One reported case involved a prospective international university student, who was allegedly exploited in a factory setting. While the concerns raised in the media did not relate to specific students at Western, the University identified that a migration agency named in the reporting had been used for the recruitment of international students at Western.

Upon becoming aware of this incident, internal discussions commenced between Western’s Procurement team and the International Student Recruitment team to assess the situation involving the known supplier. In 2024, Western engaged directly with this agency to gain a clearer understanding of the issues raised, including the nature of its interactions with the affected individual and its broader business practices. The supplier provided additional context and while Western was satisfied with the supplier’s response, we moved to implement monitoring processes and commenced discussions with the International Recruitment team around potential enhancements which could be applied to Student Recruitment Agreements and due diligence measures. Monitoring of this supplier and implementation of enhanced modern slavery contract clauses and due diligence actions will continue in 2025.



MODERN SLAVERY RISKS IN OUR SUPPLY CHAIN

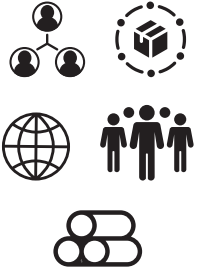
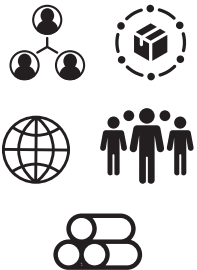

Through our risk assessments, we have identified that our greatest exposure to risks of modern slavery is through our supply chain. The table below outlines the key risk areas we have identified across our supply chain, including relevant modern slavery risk factors. While we assess these risks are present across our supply chain, we recognise they may be heightened for sourcing we undertake in offshore geographies. To support us to manage these risks, we have developed specific procurement procedures for our Surabaya Campus in Indonesia that include modern slavery-related requirements.


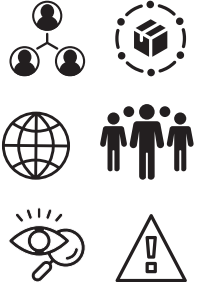
Examples of Modern Slavery Risk Factors

Reliance On Subcontracting	Reliance On Temporary/ Migrant Workers	Limited Supply Chain Visibility	Raw Material Risks	Sourcing From High-Risk Geographies	Challenges Monitoring Working Conditions For Workers On Our Sites	Reliance On Lower-Skilled Labour	Unsafe Working Conditions

KEY RISK AREA ²	MODERN SLAVERY RISK FACTORS	HYPOTHETICAL EXAMPLES	OUR RELATIONSHIP TO THE RISK	OUR INDICATIVE LEVERAGE
Facilities management (cleaning, security, catering, landscaping and other services) 5.4% of spend.		Cleaners at a university campus are repeatedly forced to work excessively long shifts without appropriate breaks, experience significant underpayment, and are not provided with adequate PPE by the cleaning provider.	Directly linked.	We typically have a higher degree of leverage with relevant service providers, due to the volume of our spend and as services are provided on our sites.
Logistics and warehousing services (freight and logistics services across the supply chain) 1.33% of spend.		A construction provider engaged by a university utilises logistics services that exploit its workers.	Directly linked.	We typically have a lower degree of leverage in this area, including as service providers are generally selected and managed by suppliers or sub-suppliers deeper in the supply chain.

Identifying our modern slavery risks (continued)

KEY RISK AREA ²	MODERN SLAVERY RISK FACTORS	HYPOTHETICAL EXAMPLES	OUR RELATIONSHIP TO THE RISK	OUR INDICATIVE LEVERAGE
<p>IT hardware and software (including offshore support services) 9.08% of spend.</p>		<p>A university procures desktop computers, laptops, and mobile phones which contain raw materials that were mined using the worst forms of child labour.</p>	<p>Directly linked.</p>	<p>We typically have a lower degree of leverage in this area, as these goods tend to have long and complex supply chains and are produced by large global companies for whom our volume of spend is not significant. Support services are generally outsourced by suppliers to providers operating offshore, which can limit our visibility of working conditions.</p>
<p>Apparel (including uniforms, PPE and branded merchandise and promotional items) 0.20% of spend.</p>		<p>A university procures uniforms for staff using an Australian-based supplier that sources its products offshore. Migrant workers at the offshore factory have their identity documents confiscated, are forced to work and are threatened with deportation if they seek assistance from authorities.</p>	<p>Directly linked.</p>	<p>We typically have a moderate to lower degree of leverage in this area, which reflects factors such as the volume of our spend, as well as the high levels of subcontracting in the apparel supply chain.</p>
<p>Teaching and research consumables (including medical and scientific equipment and laboratory consumables, including rubber gloves) 2.55% of spend.</p>		<p>Consumables used for teaching, laboratory, and research purposes are manufactured by workers who are exploited through forced labour and are unable to leave the factory complex.</p>	<p>Directly linked.</p>	<p>We typically have a lower degree of leverage in this area, as our suppliers of these goods generally source products that are manufactured offshore, reducing our visibility of these supply chains.</p>

KEY RISK AREA ²	MODERN SLAVERY RISK FACTORS	HYPOTHETICAL EXAMPLES	OUR RELATIONSHIP TO THE RISK	OUR INDICATIVE LEVERAGE
Solar panels 0.35% of spend.		A university procures solar panels as part of upgrades to a precinct. The solar panels have been manufactured using raw materials sourced using forced labour.	Directly linked.	We typically have a lower degree of leverage in this area due to the level of market concentration and the comparatively low volume of our spend in this area.
Construction labour and materials 7.93% of spend.		Workers undertaking demolition work at a construction site on a university campus are transported to and from the work site and have their movements restricted when at the offsite accommodation.	Directly linked.	We may have a moderate to higher degree of leverage with construction companies due to the volume of our spend, ability to specify the types of materials used and as services are provided on our sites.

CASE STUDY

POTENTIAL UNDERPAYMENT OF SERVICE PROVIDER

In late 2023 a matter was raised with the University concerning the provision of and payment for certain services provided to the University. The matter was investigated into 2024 as a potential modern slavery case. As part of our investigation the Office of General Counsel engaged the assistance of external specialists. The investigation did not identify any evidence to support the concerns raised in the disclosure.

The investigation also found that the University has suitable controls in place to mitigate against the risks associated with the potential underpayment of relevant service providers and for the monitoring of the services performed, and that the university had undertaken reasonable due diligence procedures in respect of the services tender and contract process. The University continues to encourage reporting similar concerns so they can be appropriately investigated.

our actions to address our modern slavery risks

At Western, we are working to address our modern slavery risks guided by our Modern Slavery Roadmap.

We continue to undertake targeted initiatives to mitigate our modern slavery risks and prioritise continuous improvement.

GOVERNANCE FRAMEWORK

Our response to modern slavery is supported by our governance framework. As detailed below, our governance framework allocates responsibility for managing and overseeing our modern slavery response, with our day-to-day response driven by our Modern Slavery Working Group.



MODERN SLAVERY WORKING GROUP

The Modern Slavery Working Group was established in 2023 to drive Western’s response to modern slavery risks within its operations and supply chains. It comprises representatives from Procurement, General Counsel, Compliance, Student Success, Infrastructure and Commercial, Human Resources, International, The College, Research, WSU Early Learning, Centre for Western Sydney, the Whitlam Institute, Environmental Sustainability, the Justice Clinic and the School of Law.

During the reporting period, the Working Group met six times and discussed a wide range of topics, including:

- Plans to further embed the UNGPs within Western’s modern slavery risk management approach, including due diligence, risk assessment and information sharing initiatives.
- Modern slavery risks for international students, including when undertaking placements, as well as related initiatives such as the International Student Recruitment Survey and engagement with international student recruitment agents.
- The development and roll out of new modern slavery e-learning modules for staff and students, as well as other training opportunities.

- Opportunities to further enhance key tools and processes, including Western’s Social Procurement Charter and Supplier Risk Heatmap.
- Key developments in NSW and across Australia, including relevant reports from the NSW Anti-Slavery Commissioner and the appointment of Australia’s national Anti-Slavery Commissioner.

Relevant Working Group members also met with the NSW Anti-Slavery Commissioner as part of his visit to Western (see page 21).

OUR POLICY FRAMEWORK

Western’s governance framework is underpinned by a range of policies. Our policies help to ensure material risks, including those associated with modern slavery, are escalated to the Board of Trustees through our executive leadership, Office of Risk and the audit and risk committee. They also articulate our expectations for our staff, contractors, students and other stakeholders around modern slavery and broader human rights issues (such as health and safety) and establish a complaints framework. The table below sets out our key policies relevant to modern slavery.

POLICY	PURPOSE AND RELEVANCE TO MODERN SLAVERY	HOW WE COMMUNICATE THIS POLICY
Code of Conduct	Sets out principles to guide the behaviour expected of Western’s staff, students employed by the University, and affiliates in line with the University’s values, which include integrity, equity, and accountability. The principles in the Code also apply to clients, colleagues and partners engaged in employment or partnerships with the University.	The Code of Conduct is available on our website and communicated to all staff through staff onboarding (including new employees’ Letter of Offer).
Complaint Management Policy	Explains how the University deals with complaints from current and prospective students, staff and members of the public, which could include modern slavery related matters.	The Complaints Policy is available on our website.
Health, Safety and Wellbeing Policy	Outlines the University’s commitment to the physical and psychological safety of our staff, students and all University community members. The Policy outlines our commitment to ensuring a safe and healthy working environment.	The Health, Safety and Wellbeing Policy is available on our website.
Modern Slavery Prevention Policy	Sets out the University’s approach to addressing modern slavery, including a commitment to undertake due diligence and work with suppliers. It also prohibits employees from any involvement in modern slavery.	The Modern Slavery Prevention Policy is available on our website.
Investment Policy	Sets out the steps for monitoring and reporting the investment and performance of all investments made by the University. The Policy includes a section on Responsible Investments that articulates the University’s commitment to being a sustainable University investor.	The Investment Policy is available on our website.
Whistleblowing Policy	Establishes a framework for reporting and managing reports of serious wrongdoing. Modern slavery-related matters may be brought forward as part of reports raised under the Whistleblowing Policy. The Policy is supported by a procedure that sets out how complaints should be investigated.	The Whistleblowing Policy is available on our website.

our actions to address our modern slavery risks (continued)

SPOTLIGHT: DEVELOPING WESTERN'S FIRST HUMAN RIGHTS POLICY

As a key step toward implementing the UNGPs, the Modern Slavery Working Group identified the need for Western to develop a broader Human Rights Policy to complement our existing Modern Slavery Policy.

The development of the Human Rights Policy marks a significant step in Western's work to strengthen our human rights due diligence and remediation approach, in alignment with the UNGPs. Our aim is for the Human Rights Policy to provide a holistic framework for Western's approach to human rights due diligence and remediation, governance and accountability, and continuous improvement.

The development of the Human Rights Policy aligns with Western's strategic goals and its commitment to the SDGs. Over the reporting period, a draft Human Rights Policy was developed in collaboration with Western Sydney University's Environmental Sustainability team and the Justice Clinic. This cross-functional partnership supported us to take a robust and evidence-based approach that draws on our University's legal expertise around human rights and addresses the intersections between human rights and the environment.

In 2025, the Policy will be circulated more broadly for review and feedback across the University. This inclusive consultation process will help us to refine the policy to ensure it effectively integrates human rights considerations into the University's approach to governance, operations, and engagement with external stakeholders.



SUPPLIER DUE DILIGENCE

As many of our key modern slavery risks are in our supply chain, supplier due diligence is a key element of our modern slavery response.

Our supplier due diligence approach includes the following actions which we implement where appropriate based on the modern slavery risk level of the procurement:

- Contractual terms that set out specific obligations for suppliers in relation to modern slavery, including to take reasonable endeavours to ensure modern slavery does not occur in their supply chains. This clause is included in new contracts that use our terms and conditions, or when a contract is renewed.
- Continuing to identify and map our supplier risks for our Tier 1 suppliers.
- Application of a modern slavery heatmap to support us to prioritise our due diligence actions based on supplier risk and spend. The heatmap incorporates assessments of modern slavery risk based on factors such as geography, the nature of the product/services sourced, and suppliers' sector or industry. Inclusion of modern slavery questions in returnable schedules for requests (tender documents) and evaluating responses against the Office of the NSW Anti-Slavery Commissioner's Guidance on Reasonable Steps scoring.
- Utilising media reports and external third-party sources to undertake supplier due diligence checks as part of our evaluation processes.
- Completion of a modern slavery SAQ by selected suppliers of laboratory and medical supplies as part of a pilot through the AUPN. Following an assessment of suppliers' responses, AUPN members are working with relevant suppliers identified as requiring support in 2025 to enhance their modern slavery response.
- Ad hoc engagement with higher risk suppliers on a case-by-case basis.
- In 2025, we will implement a Social Procurement Framework to enhance our supplier due diligence. The Framework will embed social procurement practices into procurement decision making, including in relation to modern slavery. The Framework will also link to relevant initiatives and commitments in other key strategic documents, including our Decadal Strategy: Sustainability and Resilience 2023, our Emissions Reduction Strategy, and our commitment to the SDGs.

We also anticipate further strengthening our supplier due diligence in the next reporting period as we implement a new procurement system.

OUR EFFORTS TO SUPPORT A JUST TRANSITION

We recognise that modern slavery practices, such as forced labour and the worst forms of child labour, may be present in global renewable energy supply chains, such as solar panels. These supply chains have an important role to play in global efforts to transition towards renewable energy and it is important that workers and communities in these supply chains are treated fairly and are not left behind in their access to, and co-design of, appropriate technologies, nature-based solutions, and supporting intellectual property and institutional frameworks.

As part of the ongoing development of our Social Procurement Framework, we will implement strategies and practices to support a just transition to environmentally sustainable and inclusive societies, in line with the UN SGD 2030 agenda. This will include consideration of how Western can prioritise organisations and communities within our value chain that contribute to global just transition efforts through inclusive, collaborative practices, including access to and co-design of appropriate technologies. This approach also aligns with our pledges for climate action and nature-positive solutions.

DUE DILIGENCE FOR RESEARCH PARTNERSHIPS

In addition to due diligence checks for our suppliers, Western also conducts due diligence on research projects, partnerships, and recruitment of project personnel, both domestically and internationally to assess potential modern slavery risks.

These due diligence checks can include reviewing research agreements and memorandums of understanding to identify potential risks, such as modern slavery concerns in supply chains, historical issues linked to partner entities, and any legal disputes. We also utilise a mandatory Research Risk Form to help detect potential modern slavery risks by examining supplier relationships, funding sources, and collaborations. Where appropriate, we use global indices such as the Corruption Perceptions Index, Academic Freedom Index, Democracies Index, Freedom House Index, and Human Rights Index, to assess risks associated with specific countries and partners. This due diligence is supported by training for staff on ethical research practices and regular audits of research partnerships against key standards, which can include modern slavery.

our actions to address our modern slavery risks (continued)

TRAINING AND AWARENESS

In 2024, our focus for modern slavery training and awareness, was developing an interactive e-learning module for staff and students (see spotlight below).

We also upskilled our Modern Slavery Working Group through a training session on the United Nations Guiding Principles on Business and Human Rights (UNGPs). This session provided an overview of what the UNGPs are and situated Western's modern slavery risk management approach within the UNGPs framework. The session also included discussion of our Roadmap for Implementation, which sets out our key modern slavery and broader human rights-related focus areas for the coming years. Additionally, Western has registered to participate in the 2025 Business & Human Rights (BHR) Accelerator, coordinated by the United Nations Global Compact. This initiative will serve as a highly valuable resource in strengthening and expediting our efforts to implement the UNGPs.

SUPPORT FOR STUDENTS

Students may be vulnerable to a range of modern slavery risks, as outlined on page 12. Western has implemented safeguards to support our domestic and international students, including:

- Promoting the 2024 National Temporary Migrant Survey to University students to inform the development of an evidence base around risks for students. Western achieved a high level of responses which will enable the researchers to provide us with a report specific to our student cohort.
- Provision of information to students about the University's wellbeing services such as counselling services and our pro bono legal service through the Justice Clinic. This includes information provided through student orientations.
- Vetting of university-sanctioned work placements undertaken as part of a course of study to help ensure workplaces are safe for students.
- Commencing development of a new International Student Survey to better understand our students' knowledge of relevant support and services available to them and identify areas where additional support or training could be provided.
- Including modern slavery clauses in our International Student Recruitment Agreements. Clauses set out obligations for approved agents around modern slavery, including taking reasonable steps to identify, assess and address modern slavery risks and notifying Western of any actual or suspected instances of modern slavery in the agent's operations or supply chain.

SPOTLIGHT: DEVELOPING A MODERN SLAVERY E-LEARNING MODULE FOR STAFF AND STUDENTS

During the reporting period, we developed a tailored 15-minute modern slavery e-learning module for the University's staff and students.

The module includes content to help staff and students understand what modern slavery is, why it is important the University takes action to address modern slavery, red flags to look out for, and how to report concerns. The training also sets out the types of modern slavery risks that exist for the University and how they are being managed.

To encourage engagement with the content, the modules feature interactive elements embedded throughout, as well as a short knowledge check quiz tailored to staff and students for completion at the end of the module. We also included a separate survey for participants to share their feedback which will assist us in assessing the effectiveness of the training and how we can ensure it remains fit-for-purpose.

The e-learning modules were finalised in 2024 and piloted with a select group of participants. In 2025, the training will be formally launched and made mandatory for all students. It will also be delivered to relevant staff, including Financial Delegates and those involved in procurement activities.

RESPONSIBLE INVESTMENTS

The University is committed to Responsible Investment and seeks to ensure ESG issues such as modern slavery are integrated into the development and implementation of the University's investment portfolios. The University is a signatory to the SDGs and seeks to support these through its investments where possible.

The University has appointed Mercer as its implemented consultant. Mercer Group is a founding signatory to the Principles for Responsible Investment (PRI), which began in 2006 as a United Nations-supported network of investors.

In keeping with the requirements of the Modern Slavery Act and our commitment to protecting human rights, Western reviewed its listed investments for any potential exposure to modern slavery incidents or risks. As of 30 June 2024, the University's portfolio was found to have no holdings with modern slavery red flags.

STAKEHOLDER COLLABORATION

Collaborating with our peers and other stakeholders enables us to share good practice and maximise our impact.

During 2024, we continued to connect and collaborate with the AUPN. As a member of the AUPN, Western connects with other universities via monthly collaborative sessions to discuss and identify key initiatives. During 2024, this included:

- Engaging with selected suppliers of laboratory and medical supplies around their modern slavery risk management through an SAQ process administered by the AUPN.
- Addressing potential risks around exploitation of international students, including through engagement with the 2024 National Temporary Migrant Survey.
- Engaging with civil society groups such as the Australian Red Cross to adapt resources to international students and the Australian Catholic Religious Against Trafficking in Humans around micro-credentials for students.
- Sharing of case studies and other examples from universities' work to encourage discussion of insights and good practice.
- Engaging with experts around modern slavery from a range of external organisations and groups, including other industry groups.

SPOTLIGHT: ENGAGING WITH THE NSW ANTI-SLAVERY COMMISSIONER

In August 2024, the University was honoured to host the NSW Anti-Slavery Commissioner, Dr James Cockayne at our Parramatta South Campus.

The visit formed part of ongoing engagement between the University's Office of Procurement, the Justice Clinic, and the Commissioner's office.

The meeting was attended by Vice-Chancellor and President, Professor George Williams, Board of Trustees member and Deputy Chancellor Kerry Stubbs, and Vice-President and Chief Financial Officer Darren Greentree, along with key members of the University's Modern Slavery Working Group.

This engagement provided a valuable opportunity to share details of Western's modern slavery response, explore sector wide challenges facing the higher education sector, and discuss opportunities for future collaboration.

In 2025, we will continue to explore practical opportunities for further engagement with the Commissioner.

our actions to address our modern slavery risks (continued)

GRIEVANCE MECHANISMS AND REMEDIATION

At Western, we have a range of avenues for staff, students, and other stakeholders to raise concerns in-person or anonymously in relation to modern slavery. The chart below sets out the various reporting channels stakeholders can use to report modern slavery concerns and outlines how we may respond to reports received via our Whistleblowing mechanism.

We aim to take a ‘no wrong door’ approach to reports which could relate to modern slavery. We encourage staff, students, and any affected stakeholders from Western’s community to raise concerns, no matter which channel they report through. Our priority is to listen and provide appropriate support.





**SPOTLIGHT:
WESTERN
SYDNEY
UNIVERSITY'S
JUSTICE CLINIC**

The Western Sydney University Justice Clinic is the University's community legal service and School of Law's experiential learning program.

Throughout the reporting period, the Justice Clinic continued to provide pro bono legal advice and services to victim-survivors of modern slavery through a referral pathway established with the Salvation Army's Trafficking and Slavery Safe House. The Safe House programs provide specialist supported accommodation and complex case management for people who have experienced modern slavery including forced marriage, forced labour, trafficking, servitude and other slavery-like practices. Justice Clinic lawyers work with victim-survivors of modern slavery to remediate their modern slavery experiences by accessing support through Victims Services NSW and other jurisdictions, where applicable.

The Western Sydney University Justice Clinic possesses a deep understanding of modern slavery legal frameworks and reporting regimes, dedication to access to justice for victim-survivors, practical experience in responding and delivering modern slavery-related legal services, and involvement in modern slavery research and law reform activities. On International Human Rights Day in 2024, the Justice Clinic released a new practical guide to assist case managers and advocates supporting victims of domestic violence, sexual assault, and modern slavery in New South Wales. Representatives of the Justice Clinic also continued to teach students about modern slavery through content in academic modules.

During 2024, the Justice Clinic's Director also remained an invited member of professional and expert bodies – the Commonwealth Attorney-General's Forced Marriage Civil Society Consultation Group, the Australian Institute of Criminology's Human Trafficking and Modern Slavery Research Network, and the NSW Law Society's Human Rights Committee.

assessing the effectiveness of our actions

We assess the effectiveness of our actions to manage modern slavery risks to understand our impact and identify opportunities for improvement.

We understand an effective response to modern slavery in the university sector to include:

- Maintaining an accurate understanding of potential modern slavery risk areas across our operations and supply chain
- Taking meaningful actions to manage identified risks; and
- Providing safe and accessible reporting channels for stakeholders to raise concerns.

AREA	CONTROLS	INDICATORS
Governance framework	<ul style="list-style-type: none"> → Modern Slavery Working Group. → Engagement with the Board and Board Committees. → Policies and procedures. 	<ul style="list-style-type: none"> → Quality of actions progressed and implemented by the Working Group. → Attendance and active participation in meetings by Working Group members. → Targeted engagement on modern slavery with the Board and Board Committees. → Regular review of policies and guidelines relating to modern slavery.
Supplier due diligence	<ul style="list-style-type: none"> → Integration of modern slavery considerations into procurement processes (i.e. Supplier Risk Heatmap, SAQs, and tender and contract clauses). 	<ul style="list-style-type: none"> → Inclusion of modern slavery-related requirements into all procurement requirements directly managed by the Procurement team. → Suppliers' provision of evidence of their ability to meet Western's policies and guidelines. → Tender schedules for major activities, with tenderers to provide details on their approach to mitigating modern slavery risks.
Training and awareness	<ul style="list-style-type: none"> → Modern slavery e-Learning modules for staff and students. → Procurement Roadshows. 	<ul style="list-style-type: none"> → Completion rates of modern slavery e-Learning modules. → Feedback received from end of e-Learning module surveys to staff and students. → Frequency of Procurement Roadshow presentations and feedback received.
Support for students	<ul style="list-style-type: none"> → The Justice Clinic. → Student Legal Services. → Student Welfare Services. → Complaint Resolution Unit. 	<ul style="list-style-type: none"> → Student awareness of available support services. → Level of student engagement with support services.
Research partnerships	<ul style="list-style-type: none"> → Due diligence on research partnerships. 	<ul style="list-style-type: none"> → Number of due diligence assessments undertaken and proportion of results showing modern slavery concerns.
Investments	<ul style="list-style-type: none"> → Integration of ESG issues, including modern slavery, into the development and implementation of the University's investment portfolios. 	<ul style="list-style-type: none"> → Level of engagement on human rights-related issues, including modern slavery, in investment decision making.
Stakeholder collaboration	<ul style="list-style-type: none"> → External collaboration and benchmarking. 	<ul style="list-style-type: none"> → Collaboration with sector peers and informal benchmarking of progress and initiatives against the sector.
Grievance mechanisms and remediation	<ul style="list-style-type: none"> → Whistleblowing mechanism. → Complaint Management Policy. → The Justice Clinic. 	<ul style="list-style-type: none"> → Number of reports received through grievance channels related to modern slavery. → Review of the effectiveness of Western's grievance mechanisms in line with the UNGPs' effectiveness criteria for non-judicial grievance mechanisms.

consultation

The reporting entity and its affiliates (which constitute owned or controlled entities for the purposes of the MSA) operate under the direction and governance of the University.

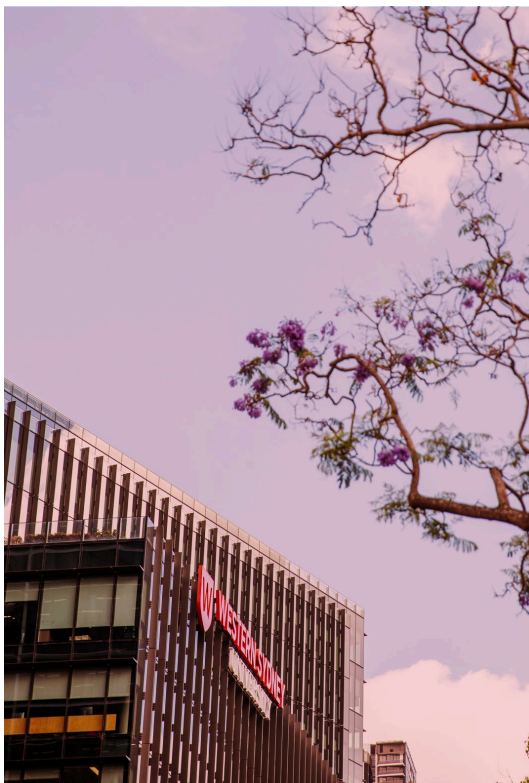
CONSULTATION WITH REPORTING ENTITIES

As this statement only covers a single reporting entity, the MSA’s requirement to consult with other reporting entities is not applicable.

CONSULTATION WITH OWNED AND CONTROLLED ENTITIES

This statement was developed in consultation with Western’s affiliates. The primary mechanism for consultation was through the Modern Slavery Working Group, which comprises representatives with roles and responsibilities that cover Western’s affiliates. A draft of the statement was also shared with other relevant stakeholders across Western.

CRITERION	SECTION OF STATEMENT WHICH ADDRESSES THIS CRITERION
Details of reporting entity	→ About this statement [Page 4] → About Western Sydney University [Page 9]
Reporting entities’ structure, operations and supply chain	→ About this statement [Page 4] → Our structure, operations and supply chain [Pages 10 & 11]
Modern slavery risks in operations and supply chain	→ Identifying our modern slavery risks [Page 12]
Actions taken to assess and address risks	→ Our actions to address our modern slavery risks [Page 20]
Assessing effectiveness of actions	→ Assessing the effectiveness of our actions [Page 28]
Consultation process with reporting entities	→ Consultation [Page 29]
Any other relevant information	→ About Western Sydney University [Page 9]



appendix 1: our reporting entities

THE WHITLAM INSTITUTE

The Whitlam Institute within Western Sydney University is a dynamic research and public policy think tank, prime ministerial archive, and public museum that commemorates and is inspired by the life and work of the Hon Gough Whitlam AC QC, Australia's twenty-first Prime Minister. The Institute advances the contemporary relevance of Mr. Whitlam's ideas and pursues the causes he and his Government championed.

WESTERN SYDNEY UNIVERSITY THE COLLEGE

Western Sydney University The College provides students with high-quality academic pathways to further their studies at Western Sydney University through University Preparation and Diploma programs. The English Language Centre offers language proficiency training and testing services, and vocational programs are offered by The College's Registered Training Organisation (RTO).

WESTERN SYDNEY UNIVERSITY EARLY LEARNING LTD

Western Sydney University Early Learning Ltd delivers high-quality care and education for children in their early years, providing a strong foundation for a lifetime of learning. Through sites across the Western campus network, Western Sydney University's Early Learning follows the latest research and best-practice models, including the National Quality Framework.

WESTERN SYDNEY UNIVERSITY INTERNATIONAL COLLEGE

The Joint Venture between Western Sydney University Enterprises Pty Ltd and Navitas to operate the Western Sydney University International College (WSUIC) in Parramatta has entered its eighth year of operation. WSUIC transitioned to independent operations, with WSUIC obtaining accreditation for its Diploma in Engineering. All commencing WSUIC students now enrol into the College's own TEQSA-accredited diplomas and Foundation Studies Program.

WESTERN GROWTH DEVELOPMENTS (PARRAMATTA INNOVATION HUB) PTY LTD

Western Growth Developments (Innovation Hub Parramatta) Pty Ltd was incorporated on 4 June 2018 to pursue its purpose of promoting scholarship, research, free inquiry, the interaction of research and teaching, and academic excellence. Principally, the entity was the co-developer with respect to the Parramatta Innovation Hub project. The entity divested its interest in the development to realise returns at project completion.

WESTERN GROWTH DEVELOPMENTS (WESTMEAD) PTY LTD

Western Growth Developments (Westmead) Pty Ltd was incorporated on 5 April 2018 to pursue its purpose of promoting scholarship, research, free inquiry, the interaction of research and teaching, and academic excellence. Principally, the entity is the co-developer with respect to the Westmead Innovation Quarter project. The entity divested its interest in stage one of the development to realise returns at project completion. The entity will operate the completed project (stages 2 and 3) to generate returns for the purpose of pursuing its objectives.

YAYASAN WESTERN SYDNEY UNIVERSITY INDONESIA (WESTERN SYDNEY UNIVERSITY INDONESIA FOUNDATION)

Western Sydney University officially opened its Surabaya campus in Indonesia on 13 February 2025. The campus welcomed its first cohort of students in September 2024. Located in Pakuwon Tower in the heart of Surabaya, East Java, the campus offers internationally recognised degrees in high-demand fields such as business, data science, information and communications technology, and computer science. Starting in September 2025, the University plans to introduce undergraduate specialisations in cyber security and business analytics, as well as flagship postgraduate programs in data engineering, information communication technology, and business administration.

appendix 2: grs annual reporting

The information in this Appendix has been provided to support our reporting obligation under the New South Wales (NSW) *Modern Slavery Act 2018* (NSW Act) and in line with the *NSW Anti-Slavery Commissioner’s Guidance on Reasonable Steps to Manage Modern Slavery Risks in Operations and Supply-Chains* (NSW Commissioner’s Guidance). This Appendix includes information about steps taken by the University and its affiliated entities, Whitlam Institute within Western Sydney University Limited (ABN/ACN 50 100 342 309), Whitlam Trust within Western Sydney University Trust (ABN/ACN 42 247 216 279), Western Sydney University Enterprises Pty Limited trading as Western Sydney University The College (ABN/ACN 44 003 474 468), Western Sydney University Early Learning Limited (ABN/ACN 39 155 993 445), Western Growth Developments (Parramatta Innovation Hub) Pty Limited (ABN/ACN 36 626 590 029), Western Growth Developments (Westmead) Pty Limited (ABN/ACN 93 625 406 411) to address the vulnerability of international students to modern slavery in response to the NSW Anti-Slavery Commissioner raising this as a ‘significant issue’ for universities under section 31(1)(a) of the NSW Act.

REPORTING CRITERIA UNDER THE NSW COMMISSIONER’S GUIDANCE	RELEVANT SECTION IN OUR MODERN SLAVERY STATEMENT*	INFORMATION ABOUT WESTERN SYDNEY UNIVERSITY’S RESPONSE
*Due to differences in the timing between the publication of this Annual Report and Western Sydney University’s Modern Slavery Statement, the title of sections in the Modern Slavery Statement may vary from those shown below.		
Total procurement spend	About Western Sydney University	Between 1 January 2024 and 31 December 2024, the University’s total procurement spend was approximately \$671.5M.
1. Commit		
1.1 Stakeholder Engagement		
What steps did your entity take to engage with stakeholders during this reporting period in relation to modern slavery?	Stakeholder Collaboration	<p>In line with the NSW Commissioner’s guidance, we recognise that addressing modern slavery requires collective action. During 2024, our main focus for collaboration and engagement was the Australian University Procurement Network (AUPN). As a member of the AUPN, Western connects with other universities through regular collaborative sessions to discuss and identify key initiatives. During 2024, this included a focus on engagement with selected suppliers through a pilot Supplier Assessment Questionnaire (SAQ) process. Another focus area was addressing potential exploitation of international students, including through engagement with the 2024 National Temporary Migrant Survey. Western promoted this survey to our students and also commenced development of a new International Student Survey.</p> <p>AUPN meetings also included engagement with civil society groups who work with potentially affected stakeholders, which may include international students. This included the Australian Red Cross and the Australian Catholic Religious Against Trafficking in Humans.</p>
Did you engage with external stakeholders on modern slavery risks in this reporting period?	Stakeholder Collaboration	<p>Yes. In August 2024, the University hosted the NSW Anti-Slavery Commissioner, Dr James Cockayne, at our Parramatta South Campus. Meeting participants included the Deputy Chancellor, Vice-Chancellor, and Chief Financial Officer, as well as key members of our Modern Slavery Working Group. The meeting provided an important opportunity to explain our modern slavery response, discuss sector wide challenges for the university sector, and options for potential collaboration. In 2025, we will continue to explore practical opportunities for further engagement with the Commissioner and other stakeholders. We also engaged with our international students by promoting the 2024 National Temporary Migrant Survey to inform the development of an evidence base around modern slavery and other risks for students.</p>

appendix 2: grs annual reporting (continued)

REPORTING CRITERIA UNDER THE NSW COMMISSIONER'S GUIDANCE	RELEVANT SECTION IN OUR MODERN SLAVERY STATEMENT*	INFORMATION ABOUT WESTERN SYDNEY UNIVERSITY'S RESPONSE
*Due to differences in the timing between the publication of this Annual Report and Western Sydney University's Modern Slavery Statement, the title of sections in the Modern Slavery Statement may vary from those shown below.		
1.2 Identify salient risks at the organisational level		
What steps did your entity take to identify salient modern slavery risks at the organisational level (i.e. across all operational and procurement activities) during this reporting period?	Identifying our modern slavery risks	At Western, we seek to target our modern slavery response to address our most severe modern slavery risks (which are outlined in our Modern Slavery Statement). Consistent with the NSW Commissioner's Guidance, this includes considering how we may cause, contribute or be directly linked to risks of modern slavery in line with the UNGPs. We also draw on a range of information sources to help us understand our exposure to modern slavery risks across our operations and supply chains and how these risks may evolve over time. These sources include The Global Slavery Index, peer networks, resources from the NSW Anti-Slavery Commissioner (including the Inherent Risk Identification Tool), guidance from the Australian Government, as well as credible publications from human rights organisations and the media.
Did you conduct or update a Salient Modern Slavery Risk Assessment in this reporting period?	N/A	During the reporting period, Western did not conduct or update a formal Salient Modern Slavery Risk Assessment. As outlined above, we continued to review our risk profile to better understand the modern slavery risks across our operations and supply chains.
1.3 Modern Slavery Policy		
What steps did your entity take to adopt a Modern Slavery Policy during this reporting period?	Governance Framework	During the reporting period, Western maintained a strong governance framework around modern slavery, underpinned by our Modern Slavery Prevention Policy (Prevention Policy). This Policy sets out the University's approach to addressing modern slavery, including a commitment to undertake due diligence and work with suppliers. It also prohibits employees from any involvement in modern slavery. As outlined in our Modern Slavery Statement, we are also exploring the development of a broader Human Rights Policy.
Do you have a modern slavery policy, approved by your senior governing body (e.g. Agency Head/ Secretary), in place?	Governance Framework	Western's Modern Slavery Prevention Policy was approved by the University's then Vice-Chancellor and President on 1 March 2022 and was most recently revised and re-approved by the then Vice-Chancellor and President on 9 April 2024.
1.4 Modern Slavery Risk Management Plan		
What steps did your entity take to adopt a Modern Slavery Risk Management Plan during this reporting period?	Our actions to address our modern slavery risks	Western does not currently have a formalised 'Modern Slavery Risk Management Plan'. We do, however, have clear governance structures and policy frameworks in place to support our management of modern slavery risks. We have also developed an internal Roadmap for Implementation, which sets out our key modern slavery and broader human rights-related focus areas for the coming years.
Do you have a modern slavery risk management plan, approved by your senior management, in place?	N/A	No. Please see further context about our response above.

REPORTING CRITERIA UNDER THE NSW COMMISSIONER'S GUIDANCE	RELEVANT SECTION IN OUR MODERN SLAVERY STATEMENT*	INFORMATION ABOUT WESTERN SYDNEY UNIVERSITY'S RESPONSE
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*Due to differences in the timing between the publication of this Annual Report and Western Sydney University's Modern Slavery Statement, the title of sections in the Modern Slavery Statement may vary from those shown below.

2. Plan

2.1 Identify and map your supply-chain risks for each procurement

<p>What steps did your entity take to identify and map your modern slavery risks at the supply-chain level during this reporting period?</p>	<p>Identifying our modern slavery risks</p>	<p>Consistent with the NSW Commissioner's Guidance, we consider how we may cause, contribute or be directly linked to risks of modern slavery in line with the UNGPs. We also continued to draw on a range of information sources to help us understand our exposure to modern slavery risks across our operations and supply chains and how these risks may evolve over time. These sources include The Global Slavery Index, peer networks, resources from the NSW Anti-Slavery Commissioner (including the Inherent Risk Identification Tool), guidance from the Australian Government, as well as credible publications from human rights organisations and the media. Our key modern slavery risks related to our supply chain are detailed in our Modern Slavery Statement.</p>
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2.2 Develop a risk-reducing sourcing strategy

<p>What steps did your entity take to develop a modern slavery risk-reducing sourcing strategy during this reporting period?</p>	<p>Supplier Due Diligence</p>	<p>At Western, we are working to integrate modern slavery considerations into our sourcing decision-making. Our supplier due diligence approach includes the following key actions:</p> <ul style="list-style-type: none"> → Application of a modern slavery heatmap to support us to prioritise our due diligence actions based on supplier risk and spend. → Completion of an SAQ by selected suppliers as part of a pilot through the AUPN. → Inclusion of modern slavery considerations in relevant tender schedules. → Contractual terms that set out specific obligations for suppliers in relation to modern slavery. → Ad hoc engagement with higher risk suppliers on a case-by-case basis. <p>In 2025, we plan to implement a Social Procurement Framework to enhance our supplier due diligence. The Framework will embed social procurement practices into procurement decision making, including in relation to modern slavery.</p>
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3. Source

3.1 Select appropriate suppliers

<p>What steps did your entity take to address modern slavery risks when selecting suppliers during this reporting period?</p>	<p>Supplier Due Diligence</p>	<p>Please refer to the description of our supplier due diligence approach in response to question 2.2.</p>
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3.2 Adopt a shared responsibility approach to contracting

<p>What steps did your entity take to adopt a shared responsibility approach to modern slavery risks, in contracting during this reporting period?</p>	<p>N/A</p>	<p>Western has reviewed the guidance and template clauses developed by the Commissioner's Office and is considering how a shared responsibility approach could be integrated into future contracting processes.</p>
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appendix 2: grs annual reporting (continued)

REPORTING CRITERIA UNDER THE NSW COMMISSIONER'S GUIDANCE	RELEVANT SECTION IN OUR MODERN SLAVERY STATEMENT*	INFORMATION ABOUT WESTERN SYDNEY UNIVERSITY'S RESPONSE
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4. Manage

4.1 Monitor and evaluate supplier performance

What steps did your entity take to monitor and evaluate supplier performance relating to modern slavery, during this reporting period?	N/A	Western engaged with selected suppliers of laboratory and medical supplies around their modern slavery risk management through an SAQ process administered by the AUPN. Following an assessment of suppliers' responses, AUPN members are working with relevant suppliers identified as requiring support in 2025 to enhance their modern slavery response. Western is involved in this process and will report on this engagement in the next reporting cycle.
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Has your entity required any of your Tier 1 suppliers to undergo an audit addressing modern slavery risks in this reporting period?	N/A	Western did not require any suppliers to undergo an audit addressing modern slavery risks during the reporting period. As noted above, Western did engage with suppliers through an SAQ process and through ad hoc engagement with suppliers where appropriate (see response to question 5.3). Western is considering scope for enhanced engagement with suppliers going forward, which may include potential audits.
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4.2 Develop supplier capabilities

What steps did your entity take to develop supplier capabilities relating to modern slavery risks during this reporting period?	N/A	During the reporting period, Western did not take specific steps to develop supplier capabilities relating to modern slavery risks. Western is considering scope for enhanced engagement with suppliers going forward.
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5. Remedy

5.1 Provide or enable access to effective grievance mechanisms

What steps did your entity take to provide or enable access to effective modern slavery grievance mechanisms during this reporting period?	Grievance Mechanisms and Remediation	At Western, we maintain a range of avenues for staff, students, and other stakeholders to raise concerns in-person or anonymously in relation to modern slavery. Reporting channels available to relevant stakeholders to report modern slavery concerns and, where appropriate, enable remediation include the Student Services Hub, Counselling Service, The Justice Clinic, and our Whistleblowing Policy. We recognise the importance of ensuring these reporting channels are effective, including that they are trusted by and accessible to stakeholders. For example, we promote these reporting channels via the University's modern slavery webpage and have also included information about reporting concerns in our modern slavery e-Learning module which we intend to roll out to staff and students in 2025.
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5.2 Take safe immediate steps to remedy harm

What steps did your entity take to safely and immediately remedy modern slavery harms to which you were connected during this reporting period?	N/A	Western did not identify any specific instances of modern slavery harm to which we identified we were connected during the reporting period. In late 2023 a matter was raised with the University concerning the provision of and payment for certain services provided to the University. The matter was investigated as a potential modern slavery case. As part of our investigation the Office of General Counsel engaged the assistance of external specialists. The investigation did not identify any evidence to support the concerns raised in the disclosure. The investigation also found that the University has suitable controls in place to mitigate against the risks associated with the potential underpayment of relevant service providers and for the monitoring of the services performed, and that the University had undertaken reasonable due diligence procedures in respect of the services tender and contract process. The University continues to encourage reporting similar concerns so they can be appropriately investigated.
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5.3 Use leverage to remediate deficient practices

<p>What steps did your entity take to use leverage to remediate deficient modern slavery risk management practices during this reporting period?</p>	<p>N/A</p>	<p>Western did not identify any specific instances of deficient modern slavery risk management practices in relation to a supplier or sub-supplier during the reporting period. However, we do engage with suppliers in relation to their modern slavery risk management practices where relevant. For example, in July 2023, several media outlets reported that users of Chinese social media apps were being allegedly tricked into coming to Australia using false promises of permanent residency. In one reported case, this included a prospective international university student, who was allegedly exploited in a retail setting. While the concerns raised in the media reporting did not relate to specific students at Western, we identified that a migration agency named in the reporting may also be used by international students at Western. We subsequently engaged with this agency to better understand the issues raised and their response.</p>
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5.4 Withdraw responsibly

<p>What steps did your entity take to withdraw responsibly during this reporting period, in connection to modern slavery risks?</p>	<p>N/A</p>	<p>Western did not identify connections to any modern slavery harm or significant levels of modern slavery risk involving another entity during the reporting period in relation to which we needed to consider withdrawing responsibly.</p>
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6. Report

6.1 Establish a victim-centred reporting protocol

<p>What steps did your entity take to establish a victim-centred modern slavery reporting protocol during this reporting period?</p>	<p>Grievance Mechanisms and Remediation</p>	<p>Should we identify a potential modern slavery incident, we would seek to respond in line with the expectations outlined in the NSW Commissioner's guidance. This would include prioritising the wellbeing of victim-survivors. At Western, we have a range of avenues for staff, students, and other stakeholders to raise concerns in-person or anonymously in relation to modern slavery (see response to question 5.1). The University also maintains a range of internal guidance to inform our responses to concerns raised with us through channels such as our Whistleblowing Policy. Western Sydney University's Justice Clinic also provides pro bono legal advice and services to victim-survivors of modern slavery. In December 2024, the Justice Clinic released a practical guide to assist case managers and advocates supporting victims of domestic violence, sexual assault, and modern slavery in New South Wales.</p>
<p>Do you have a modern slavery reporting protocol in place that prioritises the interests of the victim/survivor?</p>	<p>Grievance Mechanisms and Remediation</p>	<p>Yes. <i>(This is a yes/no question)</i></p>

appendix 2: grs annual reporting (continued)

REPORTING CRITERIA UNDER THE NSW COMMISSIONER'S GUIDANCE	RELEVANT SECTION IN OUR MODERN SLAVERY STATEMENT*	INFORMATION ABOUT WESTERN SYDNEY UNIVERSITY'S RESPONSE
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6.2 Report on your modern slavery risk management efforts		
What steps did your entity take to report on your modern slavery risk management efforts during this reporting period?	Commonwealth Modern Slavery Statement	Western prepared a Modern Slavery Statement, to comply with our obligations under the <i>Modern Slavery Act 2018 (Cth)</i> .
Did your entity report on modern slavery in its prior Annual Report?	Annual Report 2023	Yes. Western included information on its modern slavery response in its past Annual Report.
During the period, did your entity comply with its obligations to report heightened modern slavery due diligence (HMSDD) procurements valued at \$150,000 (inc. GST) or more within 45 days?	N/A	<i>Not applicable. The Commissioner has postponed the introduction of detailed HMSDD reporting.</i>
7. Improve		
7.1 Learn lessons from your performance and others'		
What steps did your entity take to learn lessons from your modern slavery performance and others' during this reporting period?	Stakeholder Collaboration Assessing the effectiveness of our actions	During the reporting period, we engaged with the Office of the NSW Anti-Slavery Commissioner to discuss sector wide challenges for the university sector and with our peers through the AUPN. This engagement helped us learn more about our own modern slavery performance and that of our peers. We have also further refined our framework to measure the effectiveness of our actions, including through developing new indicators to measure progress against key controls. Our effectiveness framework is set out in the 'Assessing the effectiveness of our actions' section of our 2024 Modern Slavery Statement.
Has your entity updated its modern slavery policies or procedures based on stakeholder feedback or lessons from a grievance mechanism during this period?	N/A	<i>This is a yes/no question. No.</i>

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7.2 Train your workforce

<p>What steps did your entity take to train your workforce during this reporting period?</p>	<p>Training and Awareness</p>	<p>During the reporting period, our focus for modern slavery training and awareness was developing a tailored, interactive e-Learning module for staff and students. We expect this will be rolled out in 2025.</p> <p>We also upskilled our Modern Slavery Working Group through a training session on the UNGPs. This session provided an overview of what the UNGPs are and situated Western's modern slavery risk management approach within the UNGPs framework. The session also included discussion of our Roadmap for Implementation, which sets out our key modern slavery and broader human rights-related focus areas for the coming years.</p> <p>In addition, our Procurement team delivered several ad-hoc, internal 'Roadshows' to functions about Western's procurement processes. These sessions included information about social procurement including content on Western's modern slavery response.</p>
<p>What percentage of your workforce received modern slavery training in the period?</p>	<p>N/A</p>	<p>During the reporting period, we focused on targeted training for selected staff. Following the anticipated roll out of the e-learning module in 2025, we will report on the percentage of our workforce trained.</p>

7.3 Cooperate with the NSW Anti-Slavery Commissioner

<p>What steps did your entity take to cooperate with the Anti-Slavery Commissioner during this reporting period?</p>	<p>Stakeholder Collaboration</p>	<p>During the reporting period, we engaged with the Office of the NSW Anti-Slavery Commissioner to discuss sector wide challenges for the university sector, discuss Western's modern slavery response and options for potential collaboration (see our response to question 1.1). In 2025, we will continue to explore practical opportunities for further engagement with the Commissioner.</p>
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