

Modern Slavery Statement

Reporting Period
1 January 2025 to 31 December 2025

The University of Canberra's statement of compliance with the *Modern Slavery Act 2018* (Cth).

Contents

Introduction	3
Our Commitment	3
About the University of Canberra	3
Structure, Operations and Supply Chain	4
Our Organisational Structure	4
Council	4
Committees of Council	4
Our Controlled Entities	4
Our Operations	5
Our Students	5
Our People	5
Our Supply Chain	6
Risks of Modern Slavery Practices	7
Operational Risks	7
International Students	7
Enterprise Partners and Agents	8
Supply Chain Risks	9
Location	10
Industry	11
Ongoing Actions Taken	12
Treatment Actions	12
Due Diligence	12
Governance Framework	14
University Internal and External Networks	15
Case Study	16

Effectiveness of 2025 actions	17
Consultation	17
Other Information	19
Annexure A – University Organisation Chart	20

Figures

1. Modern Slavery is an Umbrella Term	3
2. University of Canberra Corporate and Academic Governance Structure	4
3. Gender breakdown of University of Canberra employees	5
4. Map of University of Canberra 2025 Spend by Country	6
5. Map of International Student source countries	8
6. Global Supply Chain Risk Analysis	9

Tables

1. Gender breakdown of University of Canberra students	5
2. International Student source countries	7
3. Summary of ArcBlue Inherent Risk Assessment Analysis	10
4. University Spend by Percentage	10
5. Goods and Services purchased by the University	11

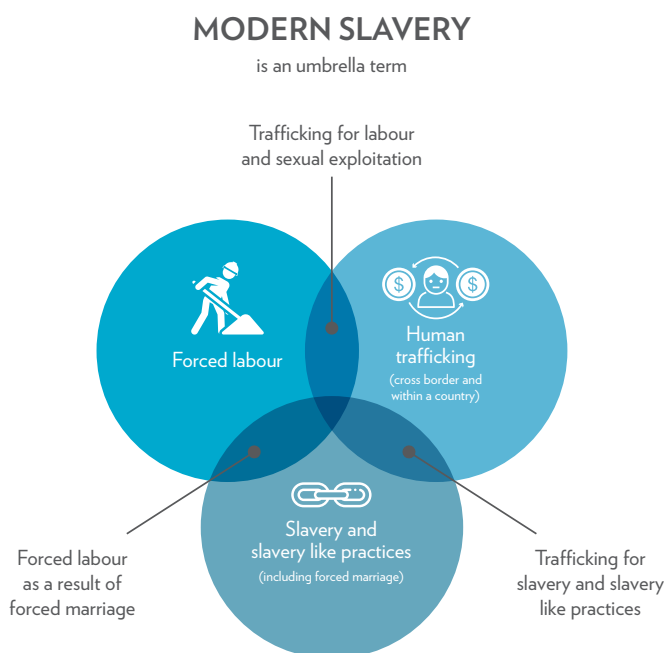
Introduction

The University of Canberra (**University**) has prepared this Modern Slavery Statement (**Statement**) in accordance with section 13 of the *Modern Slavery Act 2018* (Cth) (**Modern Slavery Act**).

Modern slavery refers to situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom. These practices include human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services, and child labour. Modern Slavery and human trafficking are serious crimes and constitute grave violation of a person's fundamental human rights.

Figure 1 provides an overview of the umbrella term 'modern slavery' as provided by the Walk Free Foundation's Global Slavery Index 2018¹ (**Global Slavery Index**), indicating the range of exploitative practices captured within this definition.

Figure 1: Modern slavery overview



Our Commitment

The University's ambition, as outlined in 'Connected', the University's decadal strategic plan 2023-2032 (Plan), is to be the most accessible university in Australia and a global leader in driving equality of opportunity.²

The University ranked number one in the *Times Higher Education* Impact Rankings in 2021³, 2022⁴, fourth in 2023⁵, seventh in 2024⁶ and 10th in 2025⁷

for reducing inequalities. This included the University's research on social inequalities, policies addressing discrimination and commitment to recruiting staff and students from under-represented groups.

The University is committed to actively addressing modern slavery by continuously reviewing and assessing its operations, supply chains and international student recruitment to prevent any involvement in, contribution to, or facilitation of modern slavery. Additionally, the University expects its suppliers, collaborators and business associates to share and uphold this commitment to reducing modern slavery risks.

About the University of Canberra

The University is a body corporate established by the *University of Canberra Act 1989* (ACT) (the Act). Section 6 of the Act defines the functions and powers of the University.

The University's primary campus is located in Bruce, in the Australian Capital Territory (ACT). In addition, in 2025, a University of Canberra degree could be studied in Sydney, Brisbane or internationally in China, Vietnam, India, Singapore, or Bhutan, through the University's global education partnerships with international institutions. Additionally, certain courses can be studied online, or in-person through the University's Third-Party Providers.

The University is a young and well-regarded Australian higher education institution. The Times Higher Education (THE) World University Rankings for 2025 ranked the University within the top 500 of all universities globally.⁸

The University's Plan supports the University to continue pursuing success and building on its achievements. The Plan weaves together three overarching themes:

- partner for community wellbeing and sustainability;
- becoming the future workforce provider of choice; and
- enhancing research and local impact.

¹ Walk Free Foundation, *The Global Slavery Index (Report, 2018)*

² University of Canberra, *Connected, A Decadal Strategy 2023-2032*

³ Times Higher Education, *Impact Rankings 2021 by SDG: reduced inequalities*

⁴ Times Higher Education, *Impact Rankings 2022 by SDG: reduced inequalities*

⁵ Times Higher Education, *Impact Rankings 2023 by SDG: reduced inequalities*

⁶ Times Higher Education, *Impact Rankings 2024 by SDG: reduced inequalities*

⁷ Times Higher Education, *Impact Rankings 2025 by SDG: reduced inequalities*

⁸ Times Higher Education, *Explore Rankings Data for University of Canberra*

Structure, Operations and Supply Chain

Our Organisational Structure

The University's organisation chart is **attached** and labelled Annexure A.

Council

The University's governing body, the Council, is established under the Act and is responsible for the University's governance, management and setting strategic direction.

The Council is required to act on all matters concerning the University in a way it considers will best promote the interests of the University.

Council is responsible for appointing the Chancellor, Deputy Chancellor, and Vice-Chancellor (and President) of the University. The Vice-Chancellor is the primary source of advice to Council and accountable to Council for the overall management of the University, within the University's legislative framework and any resolutions of Council.

Committees of Council

The University's **Academic Board** (Board) is established pursuant to the Act (Division 2.3) and is responsible, under the Council, for all academic matters relating to the University.

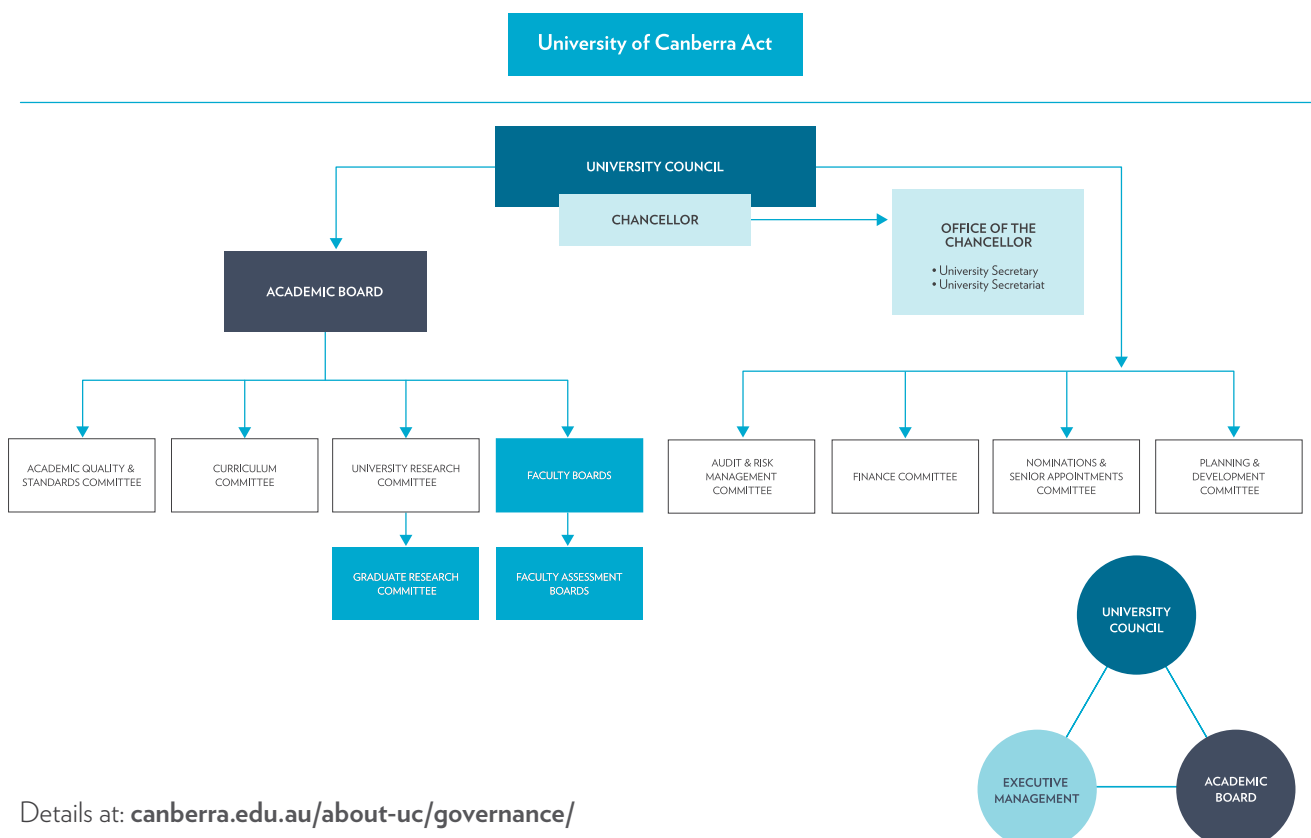
The Council and Academic Board have a number of established sub committees to support the delivery of their responsibilities. Figure 2 below outlines the University's Corporate and Academic Governance structure:

Our Controlled Entities

The University has two wholly owned subsidiary companies, namely

- UCX Ltd (UCX) (ACN 119 755 627), a not-for-profit public company, the primary purpose of which is to provide activities which support and enhance student life at the University; and
- UC Global Pty Ltd (UC Global) (ACN 095 483 686), an Australian private company in the education and research sector, providing social and economic research, modelling, and instructional/educational services.

Figure 2: University of Canberra Corporate and Academic Governance Structure



Our Operations

The University undertakes academic, research, and commercial activities in multiple countries, and works closely with government and community partners to educate the future workforce, address complex research challenges, and contribute to the prosperity and wellbeing of the ACT and surrounding region.

Our Students

In 2025, the University reported a total of 19,343 students across its campuses and online programs, including 5,613 international students - around 29% of the total number of students. Female students outnumbered male students in 2025, as detailed in Table 1 below.

Our People

In 2025, the University employed a total of 2,520 employees on either a continuing, fixed term, casual or sessional basis, of which 45 individuals were employed by UCX. The gender-based breakdown of these employees is detailed in Figure 3 below.

Table 1: Gender breakdown of University of Canberra students

Female	Male	X Gender	Unknown
11,428	7,750	94	71

Figure 3: Gender breakdown of University of Canberra employees

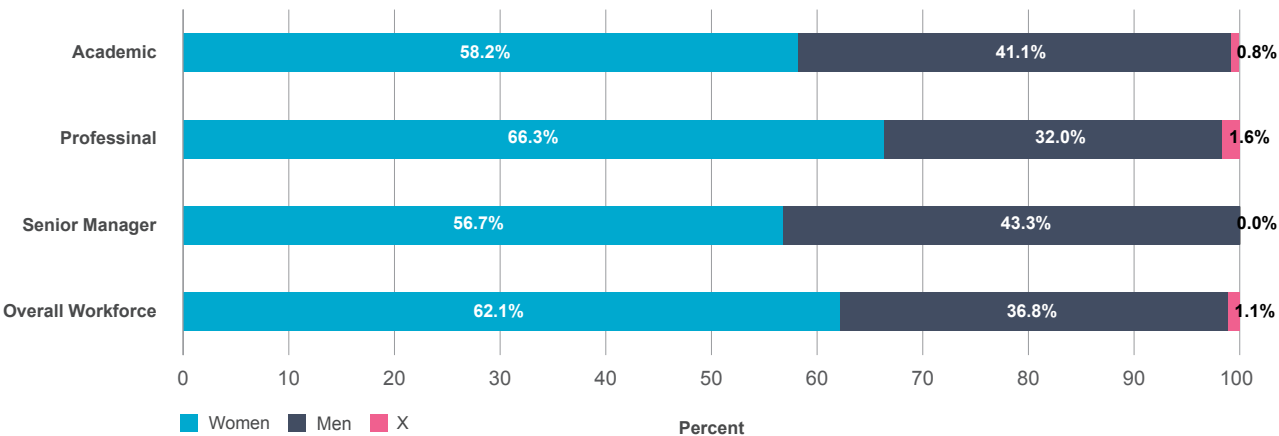
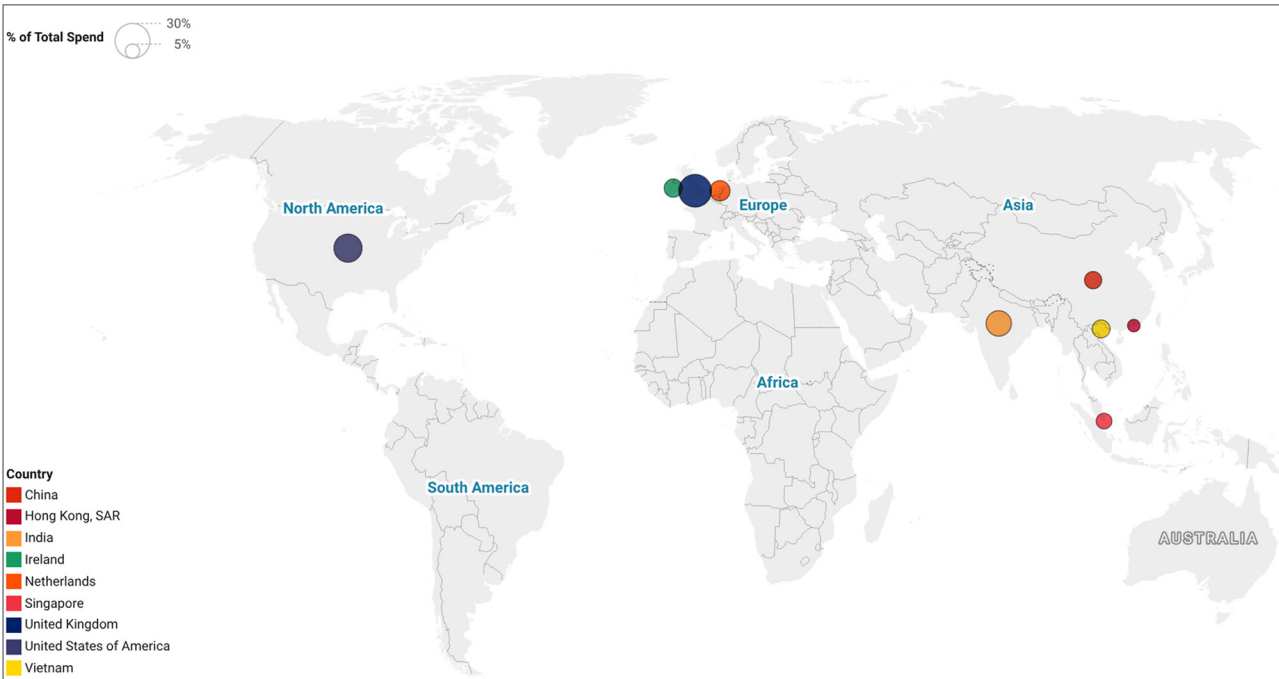


Figure 4: Map of University of Canberra 2025 Spend by Country (excluding Australia)



Research

The University is a member of Innovative Research Universities (IRU) and has a growing research capacity and reputation, advancing the early implementation of its Research Impact Framework in 2025. The University performs research activities in a range of fields including health, governance and policy analysis, education, or science and during the 2025 calendar year the University generated a total of \$15.1 million in research income. Of this income 39% was generated by the Faculty of Education (\$5.9m), 22% by the Faculty of Health (\$3.4m), and 20% by the Faculty of Science & Technology (\$2.9m) with the balance earned by the remaining faculties. Significant research income in 2025 included the University's Faculty of

- Education being awarded \$3.5m from the Australian Centre for International Agricultural Research (ACIAR) for the development of an inclusive co-design process for strengthening food security in Western Province, Papua New Guinea;
- Education receiving \$1.2m in Australian Research Council (ARC) funding for work in STEM for All: Empowering Early Childhood STEM Learning and Engagement; and
- Science & Technology being awarded \$0.7m in funding from the Riverview Group for work on Ginninderry Water Quality monitoring.

Our Supply Chain

In support of its operations, the University procures a wide range of goods and services from both domestic and international supply chains, through a range of suppliers, contractors, partners and affiliates.

In the 2025 calendar year, the University engaged in financial transactions with approximately 2,625 suppliers representing twenty-seven countries. The above heatmap displays the countries with which the University transacted in 2025, categorised by total spend with companies in each country, excluding Australia.

Risks of Modern Slavery Practices

Operational Risks

Academic excellence—reflected in the quality of our programs, the success of our students, and the impact of our research—is central to the University of Canberra’s mission. To sustain and enhance this excellence, the University fosters a broad network of collaborative partnerships across the globe.

International Students

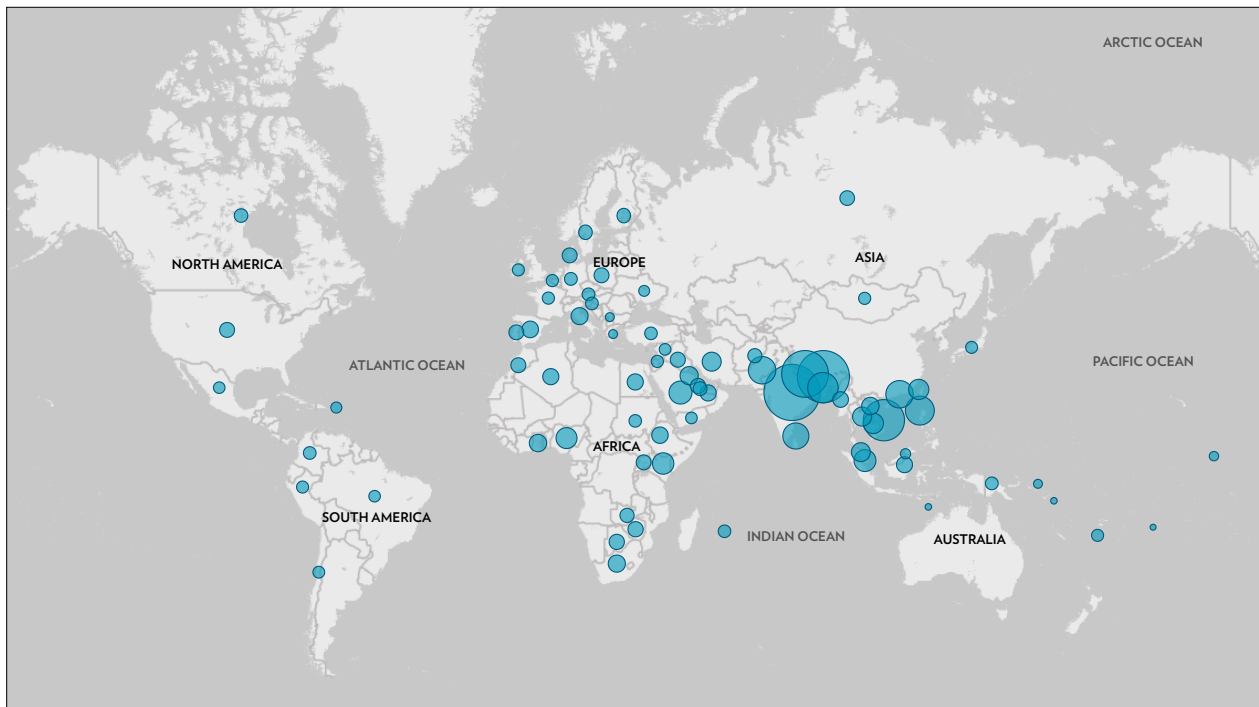
In 2025, the University had a total international student cohort of 5,613 individuals. Table 2 below details the top 14 source countries of these international students.

Figure 5 illustrates the global distribution of University of Canberra international student source countries in 2025.

Table 2: International Student source countries

Home Country	Student Count
1. India	1055
2. China (excludes SARS and Taiwan)	1012
3. Bhutan	651
4. Nepal	589
5. Vietnam	428
6. Bangladesh	183
7. Philippines	134
8. Pakistan	92
9. Korea, Republic of (South)	89
10. Sri Lanka	87
11. Hong Kong (SAR of China)	86
12. Indonesia	50
13. Singapore	48
14. Saudi Arabia	44

Figure 5: Map of International Student source countries



Student Recruitment

The University acknowledges that many of its international students come from countries where Modern Slavery practices are highly prevalent. These students are therefore vulnerable to either direct or indirect exposure to, or involvement in, incidents of modern slavery and represent a cohort requiring ongoing diligence to ensure that all students—particularly those studying far from their home countries—are protected from vulnerabilities associated with modern slavery risks.

A report by the NSW Anti-slavery Commissioner in 2023 highlighted the vulnerability of international students to Modern Slavery practices. This vulnerability is present within student recruitment, placements and international student worker exploitation. The identified risks to students include human trafficking, deceptive recruitment, poor labour practices and working conditions, forced labour (including being forced to work through threat or coercion), debt bondage resulting from predatory loan sharks, and/or the ongoing cost-of-living pressures leading students to accept high risk work opportunities.

International students may be at heightened vulnerability to modern slavery practices due to language and cultural barriers, social and cultural isolation, along with a lack of understanding of local working conditions/ labour rights.

This underscores the importance of maintaining robust processes to identify and mitigate potential modern slavery risks affecting the University's diverse student community.

Enterprise Partners and Agents

The University engages in a wide range of activities with its partners and agents, including research cooperation and joint research, the delivery of courses, provision of education pathways for international students, staff and student exchange opportunities, study abroad opportunities and study tours. The University acknowledges that some of our partners and agents operate in countries where modern slavery is highly prevalent. This poses a risk that University employees engaged in these countries may directly or indirectly experience or become involved in incidents of modern slavery. The identified risks to these employees include human trafficking, poor labour practices and forced labour.

All University employees are bound by the University's Charter of Conduct and Values. This enforceable Charter sets out the ethical framework that guides expected employee behaviours and clearly articulates the University's obligations and commitments. These standards are reinforced by the University's values and strategic direction, which promote an ethical, collaborative, and innovative organisational culture.

Additionally, the University’s Partnership Governance Framework provides whole-of-University guidance to support partnership development practices and ongoing partnership management, evaluation and renewal.

Supply Chain Risks

The University recognises that, as a global entity, it may be directly or indirectly exposed to modern slavery practices in its varied supply chains.

Throughout 2025, the University enhanced its modern slavery risk management framework by maintaining its collaboration with the Australasian Universities Procurement Network (AUPN) and applying the independent ArcBlue Inherent Risk Assessment tool to evaluate supply chain risks among its tier-one suppliers.

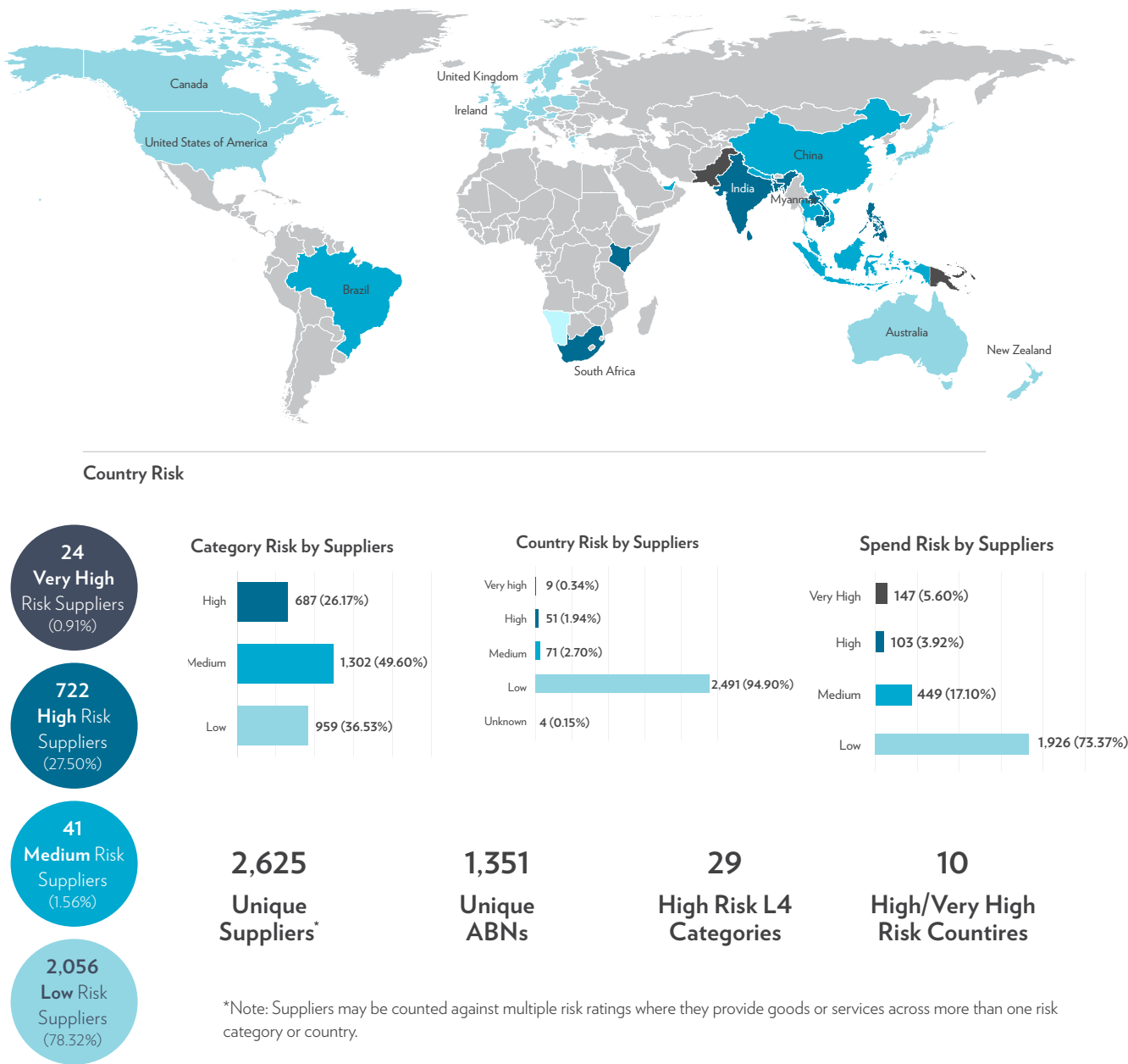
By consolidating national university spend data and aligning it with AUPN’s aggregated risk ratings—derived from supplier category, country exposure, and spend volume—the University obtained a robust and evidence-based view of modern slavery risks within its tier-one supply base. This analysis informed the University’s understanding of its inherent modern slavery risk level.

University of Canberra Global Supply Chain Risk Analysis

In 2025, the University engaged with 2,625 suppliers across its supply chain.

Figure 6 below represents a summary of the University’s global supply chain risk analysis.

Figure 6: Global Supply Chain Risk Analysis



The risk analysis undertaken by the ArcBlue Inherent Risk Assessment tool details the University’s inherent modern slavery risks in relation to country of transaction, supplier and category of goods/ services procured. The modelled University of Canberra procurement data provided by the ArcBlue Inherent Risk Assessment tool is summarised in Table 3 below.

The data below demonstrates that the majority of the University’s spend by country and by supplier fall within in the ‘low’ risk category. In relation to the category of goods/services procured, most of the transactions are at the ‘medium’ risk level. Additionally, it was identified that the University purchases goods/ services in 29 High risk categories and from 10 High/Very High-risk countries.

Location

Around 92% of the University’s total spend occurs with suppliers which are based in Australia. While the vast majority of the University’s suppliers are located domestically, the University acknowledges that some of its domestic suppliers rely on offshore suppliers who produce goods from countries where modern slavery practices are common. Additionally, by total spend India, a country which is reported to have a High/Very High risk of modern slavery, is ranked in the top three international countries from which the University procures goods and services.

Table 4 details the percentage of the University’s total spend by country, for the top 10 countries with which the University conducted financial transactions in 2025.

Table 3: Summary of ArcBlue Inherent Risk Assessment Analysis

	Very High		High		Medium		Low	
Country	9	0.34%	51	1.94%	71	2.70%	2,491	94.90%
Suppliers	24	0.91%	722	27.50%	41	1.56%	2,056	78.32%
Goods/Services Category	–	–	687	26.17%	1,302	49.60%	959	36.53%

Table 4: University Spend by Percentage

Country	Percentage of total spend
Australia	91.97%
United Kingdom	1.72%
United States of America	1.25%
India	0.99%
Netherlands	0.60%
Ireland	0.47%
Vietnam	0.45%
China	0.42%
Singapore	0.34%
Hong Kong (SAR China)	0.20%
All other countries	1.59%

Industry

Analysis of the University's annual expenditure identifies that many of the University's procurement categories align with industries identified as having heightened vulnerability to modern slavery practices. Consequently, the University recognises the potential for both direct and indirect exposure to modern slavery risks within these supply chains.

Table 5 represents the University's purchasing in inherently High-risk categories of goods and services by risk level of suppliers in 2025.

Table 5: Goods and Services purchased by the University

	Low	Medium	High
IT Services	4.85%		95.15%
Stationery, Office Supplies & Clothing			100%
Facilities Maintenance			100%
Logistics & Storage			100%
Laboratories & Research		0.65%	99.35%
Recruitment	75.31%		24.69%
Security Equipment & Services			100%
Property Management			100%
IT Software			100%
IT Hardware			100%
Infrastructure		16.67%	83.33%

Ongoing Actions Taken

Treatment Actions

Throughout 2025, the University sustained its commitment to minimising modern slavery risks by maintaining and enhancing its established processes, policies, and procedures across all areas of operation. The University's Modern Slavery Policy requires that the university "will seek to only do business with people and organisations who fully comply with this Policy, and those who are taking verifiable steps towards compliance." Further mitigation actions were informed and strengthened through the University's collaboration with sector specific experts, including active engagement with the AUPN Modern Slavery Program, through which the University contributed to the development of additional targeted mitigation measures.

Due Diligence

Supply Chain Visibility

The University possesses a comprehensive understanding of its supply chains, which supports its ability to engage constructively with suppliers and encourage the adoption of preventative measures to mitigate modern slavery risks. When a 'Very High' likelihood of modern slavery is identified, or an incident is detected, the University collaborates closely with the relevant supplier to implement remediation steps and reduce the likelihood of future occurrences.

2025 actions

- Membership of ArcBlue Inherent Risk Assessment tool;
- embedded a requirement for tendering companies to provide a Self-Assessment Questionnaire (SAQ) in relation to their modern slavery risks and mitigation practices;
- embedded a requirement for tendering companies to provide an Ethical Employment and Labour Rights Questionnaire to be included in evaluation for all procurements above a set financial threshold, where the procurement is within an industry with a High risk of modern slavery practices, including construction, cleaning, traffic management, security and Information and Communications Technology (ICT);
- increased level of engagement to include very high risk and high-risk suppliers;
- monitored proposed mitigation for very high-risk suppliers; and
- review of policy for high-risk suppliers.

Proposed 2026 actions

- Establishment of a University of Canberra Anti-Slavery Working Group, reporting through the University's existing governance framework, to ensure compliance with the Modern Slavery Act 2018 (Cth) and strengthen the University's ability to identify, manage, and mitigate modern slavery risks across its operations, supply chains, partnerships, and controlled entities;
- provide input to the AUPN's Modern Slavery Program sector-wide risk assessments to identify and prioritise investigation and treatment of supply chain categories with the highest potential impact;
- map and monitor modern slavery risks across procurement activities, enabling targeted intervention, where required; and
- deepen supplier engagement through the provision of the AUPN's Supplier anti-slavery tool kit to select University Suppliers. This tool kit incorporates six recommendations suppliers can take to improve their modern slavery awareness and risks.

Raising awareness and understanding of Modern Slavery

The University remains committed to enhancing awareness and education on modern slavery risks across all staff and student cohorts. By disseminating relevant information, providing access to specialised training, and promoting ongoing dialogue, the University empowers its workforce—especially those in high-risk operational and procurement roles—to identify vulnerabilities, exercise informed judgment, and actively contribute to the mitigation of modern slavery risks.

2025 actions

- Updated the University's previous Modern Slavery Questionnaire to a sector-wide Self-Assessment Questionnaire (SAQ) which has been reviewed and considered appropriate for use by a number of Australian universities;
- review of the Partnership information and contracts on an ongoing basis;
- explored the introduction of 'Education for Change' micro-credentials by Australian Catholic Religious Against Trafficking in Humans (ACRATH) to educate employees on understanding and identifying Modern Slavery; and

- made information on Modern Slavery risks and practices available and easily accessible to both staff and students on the University's internal online platforms.

Proposed 2026 actions

- Establishment of a University of Canberra Anti-Slavery Working Group, reporting through the University's existing governance framework, to ensure compliance with the Modern Slavery Act 2018 (Cth) and strengthen the University's ability to identify, manage, and mitigate modern slavery risks across its operations, supply chains, partnerships, and controlled entities;
- investment in ongoing professional development and knowledge sharing to strengthen sector-wide capability in addressing modern slavery risks, including through attendance at dedicated forums with expert speakers, survivor advocates and procurement professionals;
- provision of comprehensive modern slavery information—including indicators and warning signs—on the University's internal online platforms to support Procurement Officers and frontline student facing employees in identifying and escalating potential modern slavery concerns;
- dissemination to relevant University employees of the AUPN's regular newsletters, university case studies, and monthly updates to facilitate continuous learning and improvement; and
- facilitate the uptake of formalised modern slavery training opportunities, including the 'Education for Change' micro-credentials by Australian Catholic Religious Against Trafficking in Humans (ACRATH), to educate staff and/or students on understanding and identifying modern slavery practices, university-specific risks and provide practical sector guidance.

International Students

The University recognises that international students may be disproportionately exposed to modern slavery risks. By providing accessible information, insights, and practical guidance to all students, the University aims to build awareness of how modern slavery practices may manifest, empowering individuals to make informed decisions, seek support safely, and better navigate potential risks.

2025 actions

- Explored the introduction of 'Education for Change' micro-credentials by Australian Catholic Religious Against Trafficking in Humans (ACRATH) to educate students on understanding and identifying modern slavery.

Proposed 2026 actions

- Establishment of a University of Canberra Anti-Slavery Working Group, reporting through the University's existing governance framework, to ensure compliance with the Modern Slavery Act 2018 (Cth) and strengthen the University's ability to identify, manage, and mitigate modern slavery risks across its operations, supply chains, partnerships, and controlled entities;
- attendance and contribution to the AUPN's Safeguarding Students Against Modern Slavery Roundtable, which will bring together university stakeholders and experts to address risks which face students across their journey, from recruitment outside of Australia to their experiences on our campus;
- propagation of the University of Sydney Safeguarding Students against Modern Slavery operational guidance toolkit amongst relevant University staff;
- development of University guidance material covering student protections, to be made available to both University staff and students, to promote better understanding of the risks faced by international students both at the University and other tertiary education providers nationally;
- update the Report to UC - University of Canberra Intranet functionality to include specific modern slavery information and a reporting tool;
- promulgation, both online and on campus, of information regarding the assistance resources available to students who might be experiencing modern slavery, including
 - Anti-Slavery Australia;
 - the Salvation Army; and
 - My Blue Sky; and
- facilitate the uptake of formalised modern slavery training opportunities, including the 'Education for Change' micro-credentials by Australian Catholic Religious Against Trafficking in Humans (ACRATH), to educate staff and/or students on understanding and identifying modern slavery practices, university-specific risks and provide practical sector guidance.

Collaboration Across Sector

The University is an active member of the University Anti-Slavery Group, participating in monthly forums that facilitate knowledge sharing and collective problem solving. This engagement supports a collaborative, sector wide approach to identifying, managing and mitigating modern slavery risks. Through these shared efforts, the Group works to encourage suppliers to remediate identified issues within their supply chains, address risks at their source, and promote a culture of accountability and responsible practice.

2025 actions

- Sector supplier SAQ remediation plan response developed to ensure a unified approach and consistent messaging to suppliers. A pilot process was initiated with five (5) suppliers at the end of 2024, with plans to scale further following refinement;
- AUPN sector-wide laboratory consumables and medical equipment risk assessment approach;
- established a process to leverage collective university resources to create a transparent, effective, and scalable process to manage and remediate shared suppliers' Modern Slavery risk;
- reviewed and updated the University's Risk Assessment Tool; and
- identified and addressed international student worker exploitation risks with ACRATH, Migrant Justice Institute and Australian Red Cross.

Proposed 2026 actions

- Establishment of a University of Canberra Anti-Slavery Working Group, reporting through the University's existing governance framework, to ensure compliance with the Modern Slavery Act 2018 (Cth) and strengthen the University's ability to identify, manage, and mitigate modern slavery risks across its operations, supply chains, partnerships, and controlled entities;
- attendance and contribution to the AUPN's Safeguarding Students Against Modern Slavery Roundtable, which will bring together university stakeholders and experts to address risks which face students across their journey, from recruitment outside of Australia to their experiences on our campus;
- continue the University's contribution to sector-wide collaboration through the AUPN Modern Slavery Program to establish a robust foundation for collective action, continuous improvement, and sector-wide capability uplift;

- expand modern slavery risk assessments and analytics capabilities through increased collaboration in the tertiary education sector and available third-party systems;
- leverage sector-wide resources to assess risks, share best practice, and develop standardised systems for risk management and remediation to optimise transparency and accountability; and
- contribute to the AUPN's objectives to
 - collaborate on risks and issues for greater impact, including building collective leverage with suppliers and stakeholders to drive systemic change; and
 - work collectively to build capability and awareness across university suppliers, employees, and students, and lead the sector in transparent, responsible supply chains.

Governance Framework

The University maintains a suite of policies and procedures which underpin the University's commitment to mitigating modern slavery risks across its operations and supply chains.

Modern Slavery Policy

The University's *Modern Slavery Policy* formalises its commitment to preventing and addressing modern slavery practices and risks. The Policy sets clear expectations that the University, along with its partners, suppliers, contractors, and all entities with whom it engages, uphold and demonstrate the University's standards in identifying, managing, and reducing modern slavery risks within their own operations and supply chains.

Human Rights and Discrimination Policy

The University's Human Rights and Discrimination Policy

- affirms the rights of all people, asserting the University's commitment to act against individuals who engage in conduct that limits the legislative rights of others⁹; and
- affirms that all University decisions will be made, and policies will be written and enacted, with due consideration to human rights as expressed in the *Human Rights Act 2004 (ACT)*.

⁹ See Human Rights Act 2004 (ACT).

Complaints and Grievances

The University maintains a range of processes to support the reporting and management of grievances and other concerns. This includes mechanisms for addressing human rights related issues, such as an online reporting tool that enables individuals to lodge concerns—either anonymously or by name—at any time. Upon receiving a report, the University commits to initiating action within 24 business hours.

Students are encouraged to refer to the University's *Student Grievance Resolution Policy*, while staff may access guidance through the *Respect at Work (Prevention of Bullying) Policy* and the procedures set out in the University of Canberra *Enterprise Agreement*. These frameworks provide clear pathways for raising concerns and seeking resolution.

Members of the University or public may express dissatisfaction with decisions, policies and/or processes of the University in writing to the Vice-Chancellor.

The University actively encourages staff and other persons to report suspected corrupt conduct and maladministration, including conduct that may breach the University's commitments to addressing modern slavery and safeguarding human rights. Employees are protected when making such disclosures under the *Public Interest Disclosure Act 2012 (ACT)*, which provides statutory safeguards for individuals who report wrongdoing.

Procurement Framework

In 2025, the University undertook a series of initiatives to update its Procurement Framework, with these revisions currently progressing through final review and approval processes. The Framework is designed to support the University's commitment to achieving value for money through a holistic and responsible procurement approach. This approach prioritises not only financial considerations but also sustainability, ethical practice, and risk reduction—including the mitigation of modern slavery risks.

The Framework comprises a suite of policies, guidelines, tools, and templates that outline the required due diligence activities at each stage of the procurement lifecycle. This includes the mandatory requirement for suppliers to complete a Modern Slavery Self-Assessment Questionnaire as part of all procurement responses. Additionally, where the risk of exploitation is considered high, or where the procurement relates to goods or services commonly associated with modern slavery exposure, respondents are required to complete a Labour Rights Questionnaire to support the University's deeper risk analysis.

The University's standard contractual terms and conditions were updated in 2023 to include strengthened modern slavery obligations. These clauses clearly articulate suppliers' responsibilities for identifying, managing, and mitigating modern slavery risks within their operations and supply chains, providing the University with a key risk indicator and an important control mechanism.

Academic Freedom and Freedom of Speech Policy

The *Academic Freedom and Freedom of Speech Policy* affirms the University's commitment to upholding the fundamental human right to freedom of expression and the pursuit of critical and open inquiry. The University encourages all members of its community to engage in informed, respectful, and intellectually rigorous discourse, particularly on matters of public importance, including modern slavery risks.

Investment Policy

The University's *Investment Policy* requires that the University be a socially responsible institution and investor, and includes the requirement to avoid any investment opportunities that could cause social injury, including modern slavery practices. Where an organisation is deemed to have behaved in a manner inconsistent with the *Investment Policy*, the University may exclude that organisation and all associated holdings from the University's investment portfolio.

University Internal and External Networks

In 2026, the University intends to establish a University of Canberra Anti-Slavery Working Group to bring together key stakeholders from across the institution to identify and implement effective strategies for mitigating modern slavery risks affecting both students and the University's supply chains.

The Working Group will provide a dedicated forum for raising awareness, sharing insights, and coordinating actions across the University. Membership is expected to include representatives from high impact operational areas, including:

- Strategic Procurement;
- Legal and Policy;
- Risk Management;
- Student Wellbeing;
- Campus Estate; and
- Executive leadership.

By drawing together expertise from these areas, the Working Group will strengthen the University's capacity to proactively address modern slavery risks and support a consistent, institution-wide approach to prevention and mitigation.

Additionally, the University engages with a range of external networks that support sector-wide collaboration, enabling the sharing of information, resources, and leading practices relevant to modern slavery risk management. These networks include, but are not limited to:

- Australasian University Procurement Network (AUPN) (discussed below);
- Universities Australia (UA);
- Innovative Research Universities (IRU);
- Student Experience Network (SEN);
- Society of University Lawyers (SOUL);
- Tertiary Education Facilities Management Association (TEFMA);
- Council of Australian Directors of Information Technology (CAUDIT);
- Association of Chief Security Officers – UK (AUCSO);
- Society for College and University Planners – Canada (SCUP);
- University Risk Management & Insurance Association – USA (URMIA);
- Australasian Tertiary Education Management (ATEM);
- Gartner (for Legal, Risk, Audit, Health & Safety and IT); and
- ANZSSA – Australian and New Zealand Student Services Association.

These networks offer valuable forums for members to exchange insights on supplier performance and to collaborate on matters of shared importance across the tertiary sector, including the identification and mitigation of modern slavery risks.

Case Study

AUPN – Australasian Universities Procurement Network Modern Slavery Program

The Australasian Universities Procurement Network (AUPN) Modern Slavery Program is a higher education sector wide initiative involving 41 universities across Australia and New Zealand. The Program leverages the collective spend, market influence and shared expertise of participating institutions to maximise purchasing power, promote ethical procurement, and support compliance with the Modern Slavery Act 2018 (Cth).

Built on strong sector collaboration, the Program provides a coordinated approach to identifying risks, sharing insights, and developing best practice responses. Through its membership in the AUPN, the University worked closely with other Australian universities to exchange information, strengthen capability, and contribute to shared modern slavery mitigation strategies.

The AUPN Modern Slavery Program has established a robust foundation for collective action and continuous improvement across the higher education sector. In 2025, the AUPN undertook a Supplier Assessment Questionnaire (SAQ) program, focusing on laboratory and medical consumables. This assessment revealed varied levels of supplier understanding regarding modern slavery practices. Following this analysis, the AUPN undertook targeted engagement with five (5) suppliers identified as presenting the highest risk in this category.

Further, the AUPN commenced an in-depth review of modern slavery risks within the medical gloves sector—an area previously examined in 2021. This updated review is expected to be finalised in 2026 and will inform stronger mitigation measures across the sector.

The University has also benefited from AUPN's partnerships with global organisations such as Electronics Watch, which provides independent monitoring, transparency, and remediation support within electronics supply chains. These partnerships ensure that the University has access to credible evidence, global expertise, and contemporary training materials designed to enhance its ability to identify, prevent, and address modern slavery risks effectively.

Looking ahead, the AUPN has identified several priority areas for further sector uplift, including the expansion of risk assessment programs, deeper supplier engagement, the development of sector-specific guidance relating to student protections, and exploration of enhanced analytics capabilities through third-party systems.

Effectiveness of 2025 actions

The University acknowledges that, despite the range of mitigation strategies implemented in 2025, there remains a residual risk that its partners and agents may still be directly or indirectly involved in modern slavery practices, including through coercion, deception, or undue influence in the recruitment of international students, or through risks embedded within their broader supply chains.

To assess the effectiveness of its modern slavery mitigation measures, the University continues to monitor and evaluate a range of activities, including:

- **the introduction of the SAQ and updated contract clauses**, which help initiate informed discussions with suppliers, prevent perpetration of modern slavery practices in procurement and enhance awareness of modern slavery risks within the University's extended supply chain;
- **feedback from employees** regarding the utility and effectiveness of due diligence processes in relation to identifying and reacting to modern slavery risks in relation to both the University's supply chain and student cohort, including opportunities for strengthening these processes;
- **feedback from students** on their level of awareness and understanding of modern slavery risks, including their ability to recognise potential indicators and seek redress, where appropriate;

- **the frequency and depth of modern slavery related discussions** occurring across the University workplaces, including instances where advice is sought or risk assessments are undertaken;
- **the adoption of enhanced tools, training, and resources** to support staff in fulfilling the University's modern slavery commitments; and
- **ongoing learning and continuous improvement resulting from the University's engagement with the AUPN and its member network**, which continues to inform training, guidance materials, and sector wide best practice.

The University recognises that efforts to address modern slavery risks must remain dynamic and responsive. Accordingly, work in this area is ongoing and subject to regular oversight through internal governance mechanisms, including reporting to the Audit and Risk Committee and the Anti-Slavery Working Group (to be established in 2026). To further strengthen accountability and continuous improvement, the University intends to introduce key performance indicators to assess the effectiveness of its actions.

While meaningful steps have been taken to mitigate modern slavery risks affecting both the University's students and its supply chains, the University acknowledges that further work is required and remains committed to advancing these efforts.

Consultation

Throughout 2025, the University engaged with its controlled entities—UCX and UC Global—to raise awareness of modern slavery risks affecting both student facing activities and supply chains, and to gain a clearer understanding of the measures these entities have implemented to reduce the likelihood and impact of modern slavery practices.

While the University maintains overarching governance, performance, and reporting responsibilities for its controlled entities, each entity operates under its own board and constitution, ensuring that risk management responsibilities are appropriately discharged, and statutory obligations and fiduciary duties are fulfilled appropriately.





Other Information

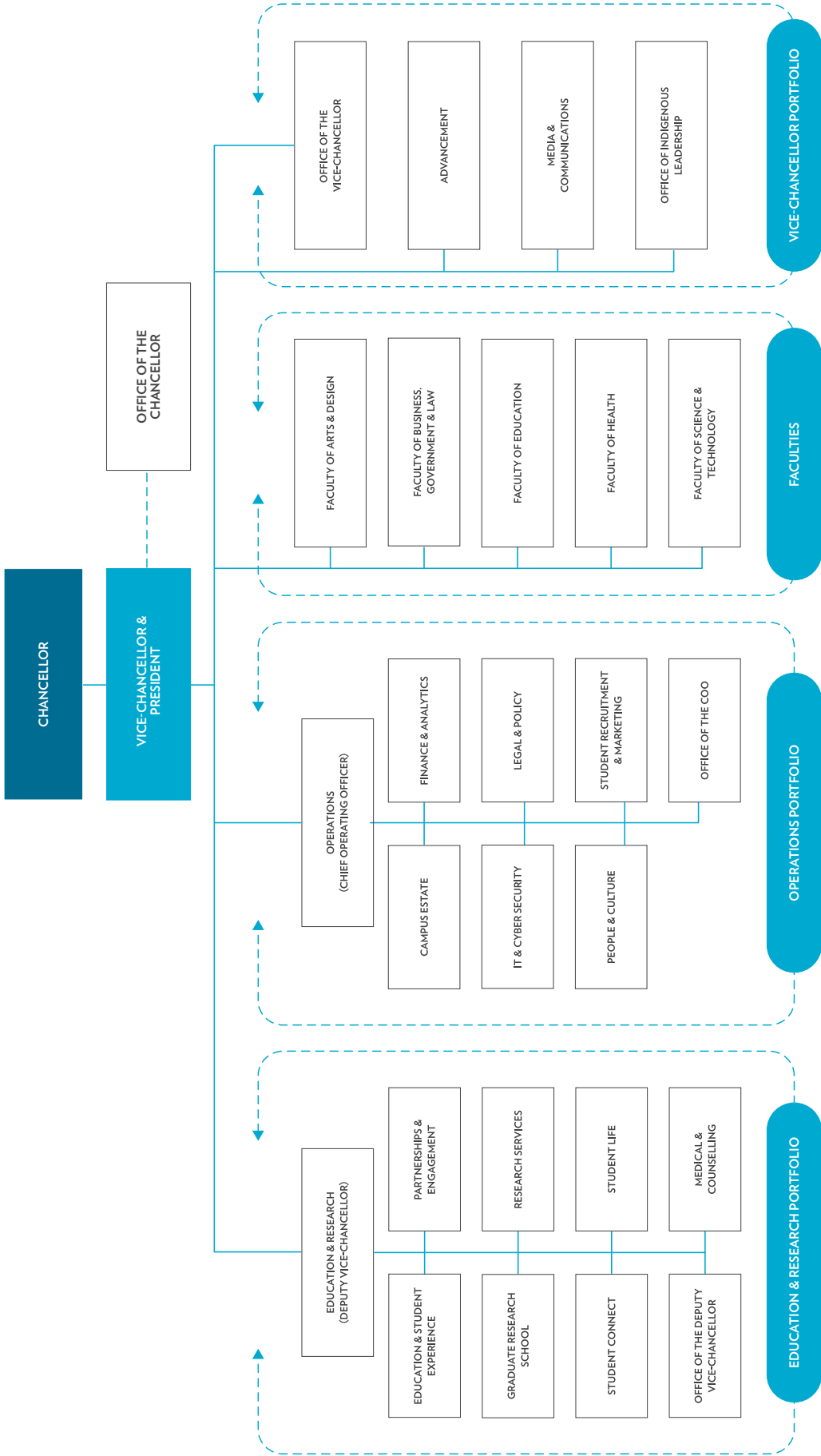
This statement is made pursuant to section 13 of the *Modern Slavery Act 2018* (Cth) and constitutes the University of Canberra's Modern Slavery Statement for the calendar year ending 31 December 2025. This Statement has been approved for release by the Council of the University of Canberra, at a meeting on 07/05/2026.



Professor The Hon. Bill Shorten

*Vice-Chancellor and President
University of Canberra*

Annexure A – University Organisation Chart







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