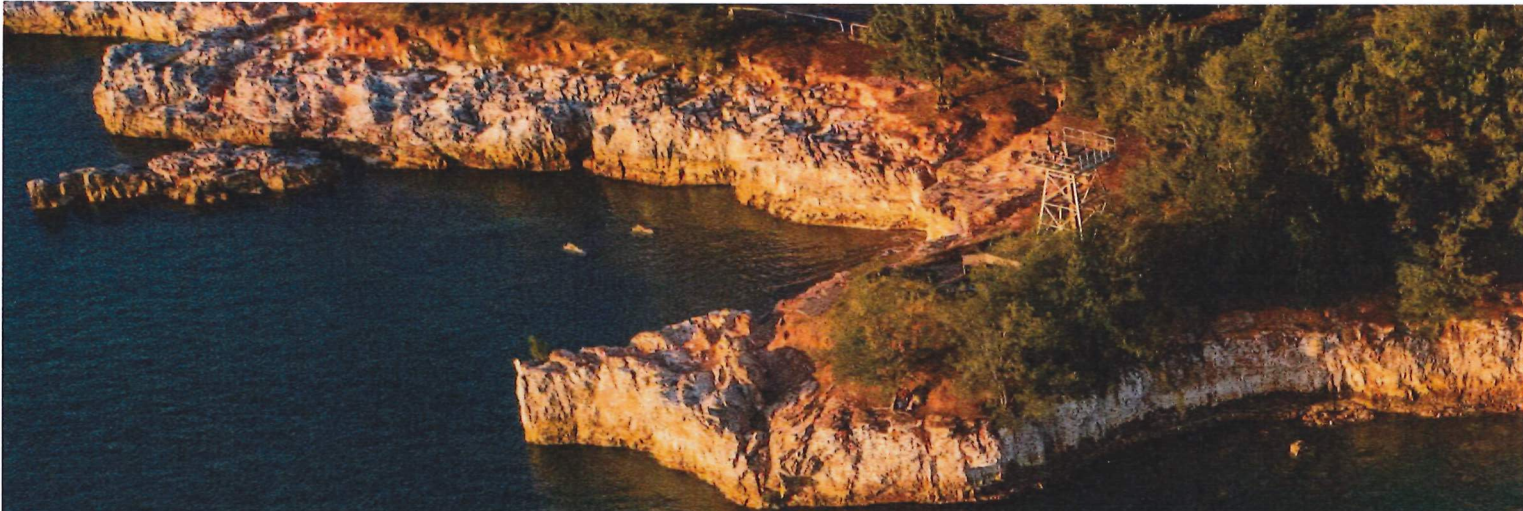




Modern Slavery Statement 2025

Charles Darwin University





Acknowledgement of Country

Charles Darwin University acknowledges and respects the many Australian First Nations traditional custodians of the lands upon which our campuses and centres are located.

We acknowledge and pay our respect to the Larrakia who are the traditional custodians of the lands upon which our Education and Community Precinct, Casuarina, Waterfront, and Palmerston campuses and centres are located.

We acknowledge and pay our respect to the Arrernte who are the traditional custodians of the lands upon which our Alice Springs campus is located.

We acknowledge and pay our respect to the Jawoyn, Wardaman and Dagomon who are the traditional custodians of the lands upon which our Katherine campuses are located.

We acknowledge and pay our respect to the Gadigal who are the traditional custodians of the lands upon which our Sydney campus is located.

We acknowledge and pay our respect to the Turrbal and Yuggera who are the traditional custodians of the lands upon which our Brisbane centre is located.

We acknowledge and pay our respect to the Warumungu who are the traditional custodians of the lands upon which our Tennant Creek centre is located.

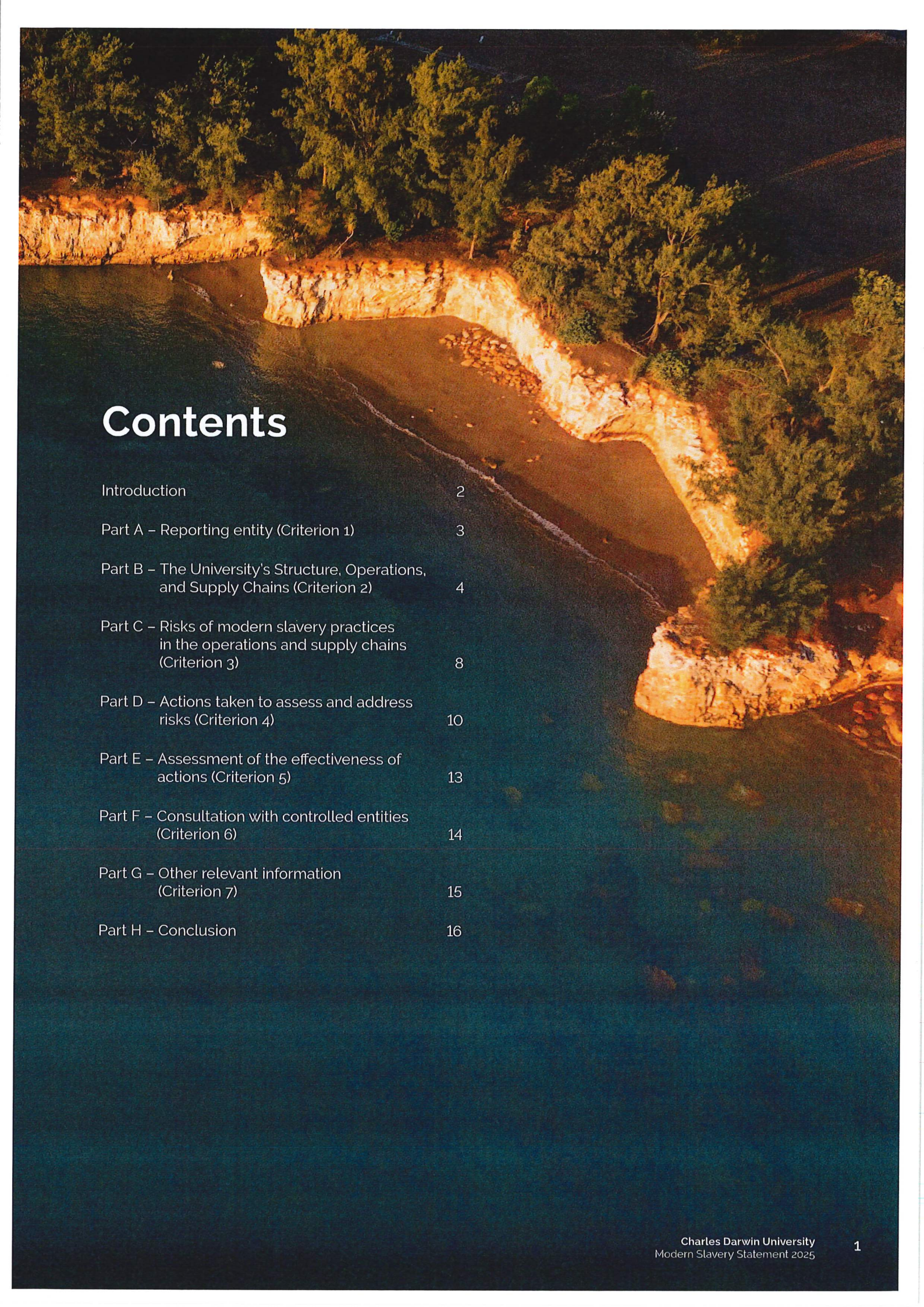
We acknowledge and pay our respect to the Yolngu who are the traditional custodians of the lands upon which our Nhulunbuy centre is located.

We also acknowledge and pay our respect to the Mirrarr (Jabiru), the Kungarakana and Warrai (Batchelor and Adelaide River), the Anindilyakwa (Groote Eylandt) and the Tiwi (Tiwi Islands) people.

We acknowledge Australian First Nations peoples' long tradition of sustaining their communities and environments over thousands of years. They are the first educators and first innovators.

They are the holders of knowledge that makes an important contribution to the improvement of our local, national and global communities.

We extend our respect to Elders - past, present and emerging - and to all First Nations people.

An aerial photograph of a rugged coastline. The top half of the image shows a dense forest of green trees on a hillside. Below the trees, a series of white, eroded cliffs drop down to a dark, sandy beach. The ocean is a deep blue, with white foam from waves visible near the shore. The overall lighting is warm, suggesting late afternoon or early morning.

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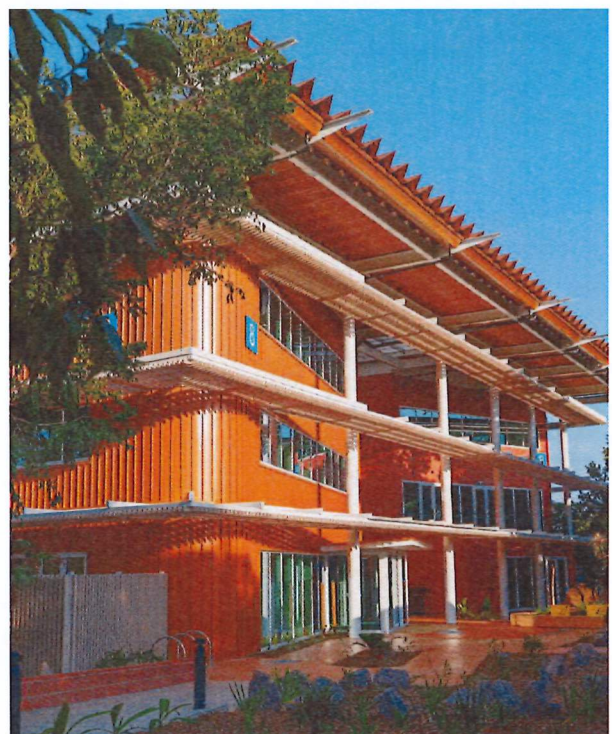
Introduction

Charles Darwin University (CDU) provides this statement in accordance with the *Modern Slavery Act 2018 (Cth)*. This is our fifth statement under the Act covering the period 1 January 2025 to 31 December 2025.

CDU is committed to eliminating all forms of modern slavery where coercion, threats or deception are used to exploit victims and undermine their freedom. Modern slavery is a complex global matter and can occur in various forms, such as slavery, servitude, human trafficking, forced marriage, forced labour, debt bondage and child labour. CDU acknowledges its responsibility as a higher and vocational education provider, researcher, employer, and a buyer/consumer of goods and services to safeguard human rights.

CDU is deeply committed to operating ethically and establishing processes to identify and mitigate the risks of modern slavery in our operations and supply chains.

The modern slavery risks inherent in the operations of CDU are identified in Part C. The role that the University can play as an educator in highlighting awareness of modern slavery within its sphere of influence is set out in Part D.



Part A – Reporting entity (Criterion 1)

Charles Darwin University Group consists of the following entities:

Charles Darwin University Menzies School of Health Research (Menzies)

Charles Darwin University was founded in 2003 after merging the Northern Territory University (including the Centralian College of Alice Springs, Katherine Rural College, and the University College of NT) and the Menzies School of Health Research.

CDU is a sustainable, innovative, creative and inclusive university. We offer more than 300 degrees, diplomas, certificates and short courses across a wide range of fields such as health, nursing, education, environmental science, business, the arts, Indigenous knowledge systems, and more.

We are a dual-sector university committed to our core business of vocational skills and training, higher education teaching and learning, research and engagement. We are student-centered, industry-relevant, and deeply connected to our communities and our partners.

Located in the Northern Territory, CDU is the largest tertiary education provider in the Territory and offers both academic and vocational education programs in Australia and around the globe through flexible, online learning at 12 campuses and training centres, and in over 100 regional and remote locations.

Menzies was established in 1985 as a body corporate of the Northern Territory Government under the *Menzies Act 1985*. This Act was amended in 2004 to formalise the relationship with Charles Darwin University (CDU). Menzies is now a major partner of CDU and constitutes a school within the University's Institute of Advanced Studies.

Menzies is one of Australia's leading medical research institutes dedicated to improving the health and well-being of Aboriginal and Torres Strait Islander peoples. They are also a leader in global and tropical health research into life-threatening diseases. Through effective partnerships with communities across northern Australia and the Asia-Pacific region, we aim to translate our research into real change.



Part B – The University's Structure, Operations, and Supply Chains (Criterion 2)

Structure

CDU is a body corporate enacted on 5 November 2003 by the *Charles Darwin University Act 2003 (CDU Act)*. We are the parent entity domiciled in Australia with approximately 1426 full-time equivalent employees. Staff are employed under the CDU Enterprise Agreement 2025 and governed by the staff Code of Conduct.

For the purpose of the *Modern Slavery Act 2018*, the governing authority of CDU is the Charles Darwin University Council (the Council).

The Council, comprising 15 members, is the principal governing body of the University. It was established under the *Charles Darwin University Act 2003*, led by the Chancellor and a Deputy Chancellor (elected by the Council members). Many of the members are appointed by the Administrator of the Northern Territory. The Council is responsible for the governance of the University, acts in its best interest, drives performance through strategy and stewardship, provides overall strategic guidance, and oversees senior management in carrying out that strategic direction.

The Council is supported by four sub-committees:

- Executive Committee of Council, which supports the Vice-Chancellor and the University's senior executive team to identify challenges and opportunities for the University as they arise.
- Finance and Infrastructure Development Committee, which reviews financial planning and reporting, people and culture, infrastructure reporting, risk management, and compliance.
- Audit, Risk, and Compliance Committee, which reviews financial reporting, external/internal audit, risk management, fraud, internal controls and compliance.
- Nominations, Honorary Awards, and Legislation Committee, which acts as a selection panel for various nominations and honorary awards.

Operations

CDU is a dual-sector university committed to our core activities of vocational skills and training, higher education teaching and learning, research, and engagement.

The University supports a diverse student cohort across its Higher Education and TAFE operations. At end of 2025, international students represented approximately 36% of Higher Education enrolments, with students originating from 69 countries, alongside a smaller but diverse international presence in TAFE spanning 39 countries. Student cohorts are predominantly drawn from the Asia region, accounting for approximately 85% of Higher Education international students and around 62% of TAFE international students, reflecting the University's international education footprint. In Higher Education, enrolments are relatively concentrated, with Nepal 29%, India 23% and Bangladesh 15% together accounting for approximately two thirds of international students, while TAFE enrolments are more broadly distributed across countries, with the largest cohorts from Indonesia, Vietnam and China. The University delivers programs across 39 Higher Education disciplines and 18 TAFE industry groups, contributing to the diversity of its operations.

CDU is a deeply connected university, working in partnership and collaboration with First Nations peoples, our communities and industries, government, and alumni to address the needs of the Northern Territory and regional, rural, and remote people nationally and globally.



Supply Chain

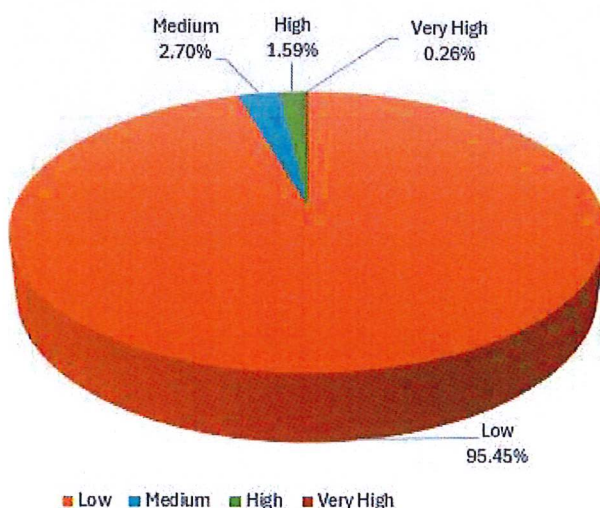
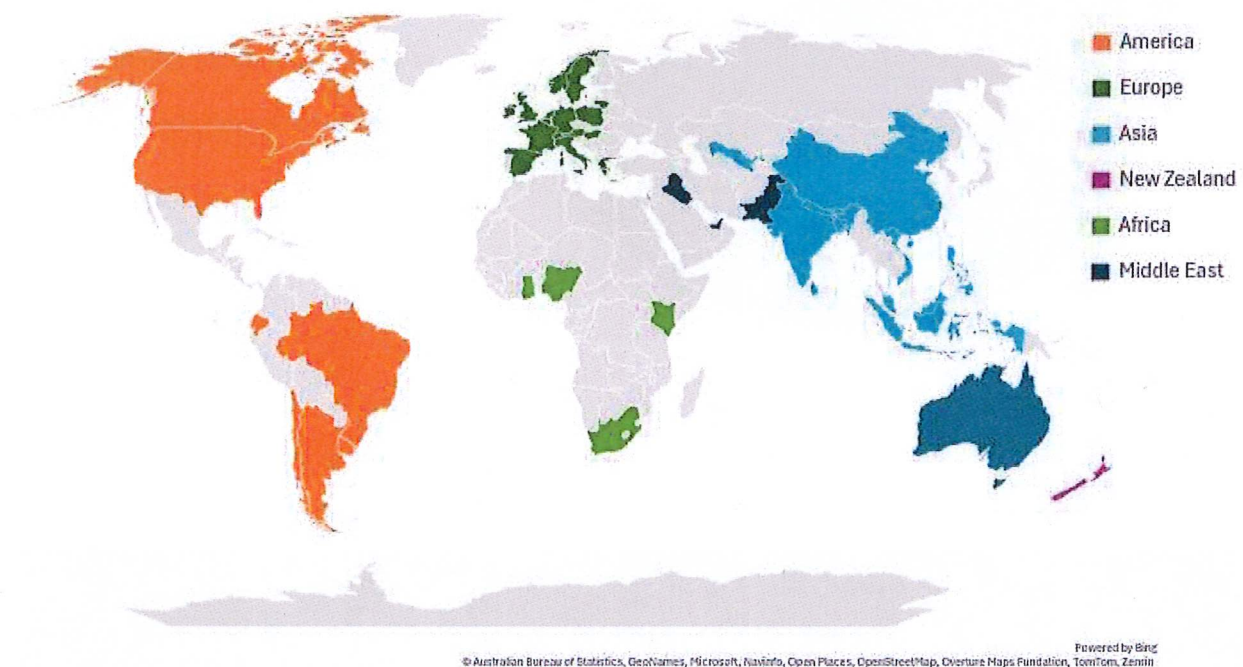
CDU is a significant purchaser of a wide variety of goods, services, and capital works essential to supporting the University's operational and strategic goals. Our procurement practices are governed by CDU's Procurement Policy and Procurement Procedure, which ensure ethical, transparent, and value-driven outcomes.

The AUPN is leading a sector-wide collaboration to help member universities enhance human rights transparency and manage modern slavery risks in their supply chains and operations. This initiative supports compliance with the Modern Slavery Act 2018 (Cth) while reducing duplication of efforts and associated costs across universities.

As more suppliers complete the modern slavery questionnaire, our visibility of potential risks improves, enabling CDU to enhance its approach to addressing modern slavery across our procurement activities.

In 2025, CDU engaged with 2,705 suppliers, both domestic and international, with the majority based in Australia. In 2025, the University's procurement spend totalled \$196 million, distributed across suppliers in 49 countries. 89% of this spend was within Australia, with the remaining allocated as follows: 4% in Asia, 3% in America, 3% in Europe, and less than 1% in New Zealand, Middle East and Africa.

Spend by Continent

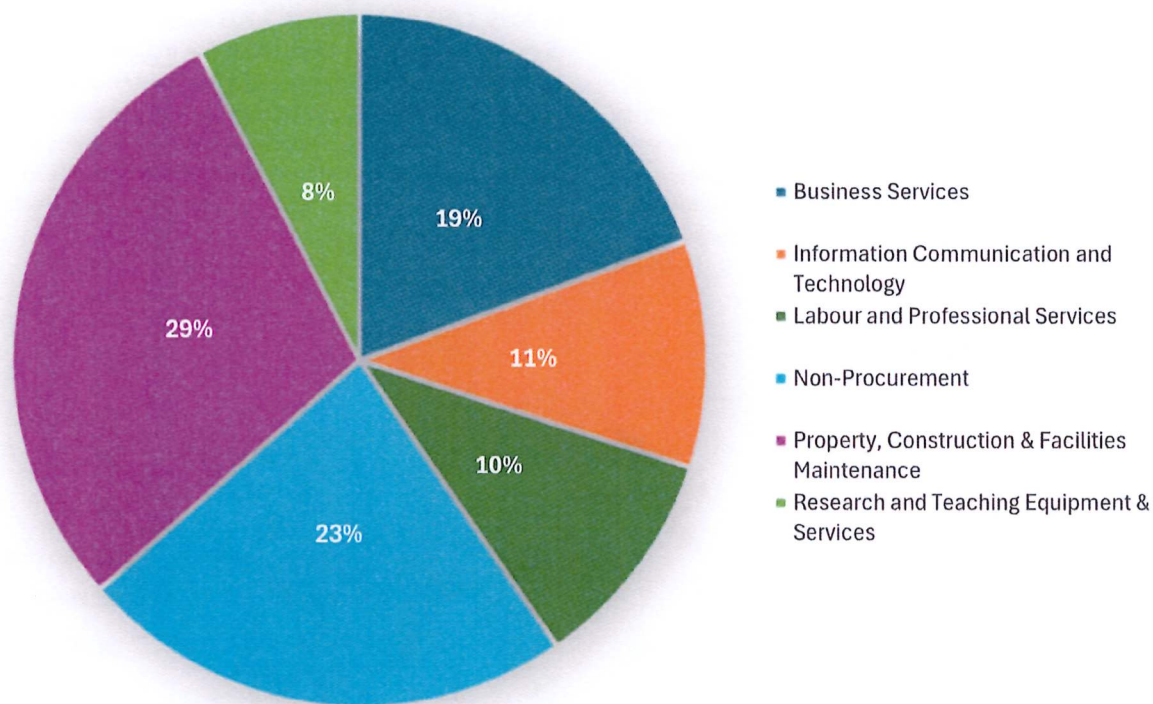


Country risk of suppliers is as follows:

- Low 95.45%
- Medium 2.70%
- High 1.59%
- Very High 0.26%

While less than 2% of our suppliers are located in countries assessed as high to very high-risk for modern slavery, CDU recognises that risk may still exist within broader supply chains, regardless of the immediate supplier's location. We are committed to identifying, understanding, and mitigating the risks of modern slavery throughout our procurement processes.

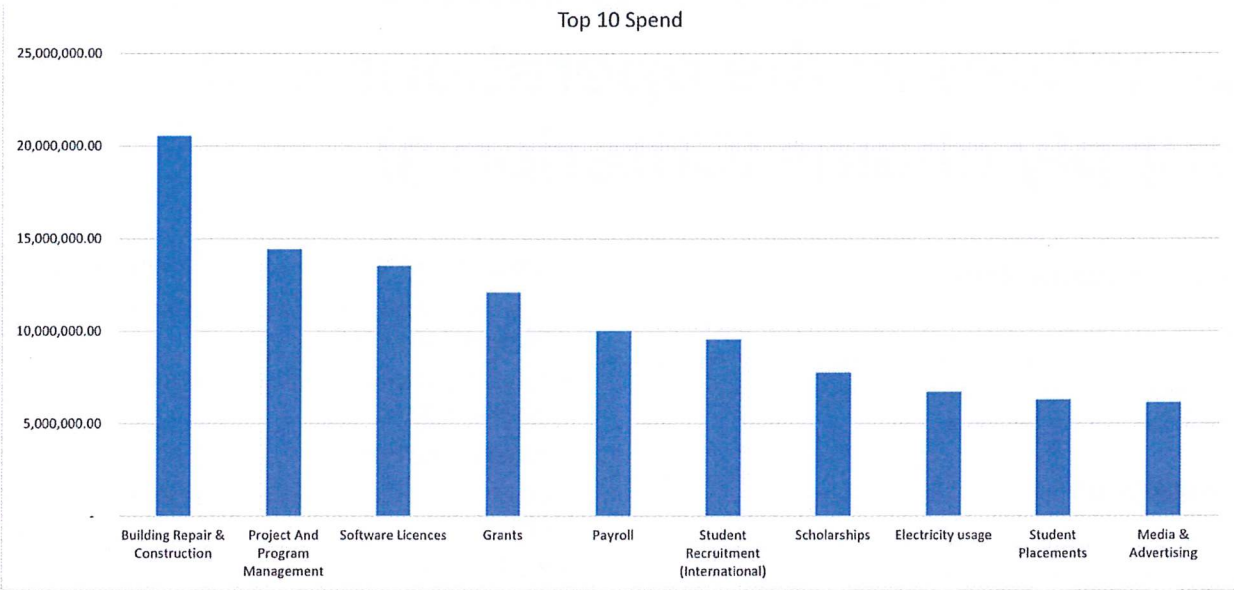
We source a broad and diverse portfolio of goods and services to support our operations and project delivery. In alignment with the AUPN taxonomy codes, our expenditure can be broadly classified into the following high-level categories:



The table below presents the subcategories aligned to each primary classification. “Non-Procurement” has been excluded, as it does not have any defined subcategories.

 Business Services • Corporate Services • Logistics & Storage • Marketing & Events • Stationery, Office Supplies & Clothing • Travel & Fleet	 Information Communication and Technology • IT Hardware • IT Services • IT Software • Telecommunications	 Labour and Professional Services • Contracted Services/Advice • Recruitment • Training & Development	 Property, Construction & Facilities Maintenance • Energy & Utilities • Facilities Maintenance • Infrastructure • Property Management • Security Equipment & Services	 Research and Teaching Equipment & Services • Collaborations • Education Services • Laboratories & Research • Lecturer & Teaching Expenses • Library Services • Student Services
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The top 10 expenditure categories within CDU's supply chain were as follows:



• **Building Repair & Construction:** Although overall procurement spending declined following completion of the Danala City Campus in 2024, CDU continues to deliver several capital works projects through 2025. These include the completed Centre for Better Health Futures, ongoing air conditioning chiller refurbishment works at Casuarina, and the Nursing Simulation Laboratory in Melbourne.

In addition, routine repair and construction activities continue across campuses. As a result, this remains CDU's highest spend category and a higher-risk area for modern slavery. This reflects the construction industry's complex supply chains, reliance on subcontracting, and use of low-skilled and potentially vulnerable workers.

Project and Program Management (Consulting Services): CDU continues to invest in a major systems transformation program to improve student and staff experience. This has resulted in sustained high spending on project and program management services, largely delivered by external consultants.

While consulting services generally present lower modern slavery risk than sectors like construction, risks can still emerge through labour hire, offshore delivery, and subcontracting arrangements, which may reduce visibility of working conditions.

• **Software Licences:** Spending on software licences remains steady, reflecting CDU's reliance on enterprise systems and digital platforms.

This category is typically lower risk for modern slavery; however, risks may exist within global supply chains, including outsourced development, technical support, and hardware manufacturing, where labour practices may be less visible.

CDU recognises these differing risk levels and continues to apply a risk-based approach to procurement, including supplier onboarding, contractual requirements, and ongoing engagement to identify and manage modern slavery risks.



Part C – Risks of modern slavery practices in the operations and supply chains (Criterion 3)

Risks in operations

The risk of modern slavery practices being caused by, or directly linked to, CDU and its controlled entities through current operations has been assessed as low, based on the following considerations:

Employees

In respect to the direct employment of our people, one of our goals in the Strategic Plan 2021-2026 is to be an employer of choice where people feel supported and happy. The risk of employment practices leading to modern slavery is low as most staff employed by the University are protected under the conditions in the CDU and Menzies Enterprise Agreements 2025 (EA). The EA provides support for our staff and requires the University to meet the employment conditions as a minimum. Most CDU & Menzies employees are employed directly on a permanent, fixed term or casual basis through standard contracts of employment administered centrally by CDU's People and Culture team and the Menzies HR team. CDU acknowledges the vital role of both mental and physical wellbeing and is dedicated to promoting a holistic, integrated approach to employee health. This dedication is demonstrated through a variety of initiatives, such as wellbeing events, online learning resources, and confidential support via the Employee Assistance Program. CDU provides a supportive and flexible workplace for those balancing families, has cultural and religious commitments, and promotes career growth. We are committed to maintaining a safe, family-friendly, environmentally conscious, and culturally respectful workplace with equal opportunities for everyone.

In addition, the University has policies directly related to the safety and well-being of people including:

- Academic Freedom and Freedom of Speech Policy
- Anti-Racism Policy
- Bullying, Harassment and Discrimination Policy
- Child Abuse Allegation and Reporting Procedure
- Child Safety Policy
- Code of Conduct – Staff
- Code of Conduct – Students
- Diversity, Equity and Inclusion Policy

- Enterprise Risk Management Policy and Procedure
- International Students – Welfare of International Students U18 Procedure
- Sexual Exploitation Abuse and Harassment Prevention Policy
- Sustainability Policy
- Whistleblower Reporting (Improper Conduct) Procedure
- Work Health and Safety Policy

Further to the above, CDU continues to be a values-led organisation. Our Strategic Plan 2021-2026 sets out the values in which we will engage with our people and stakeholders. Three of the values below are at the forefront in how we interact with people in our business operations:

- **Courage** – we make courageous decisions to act in the best interests of our students, our people and our communities.
- **Kindness** – in all things we act with respect, decency, and integrity and strive to understand each other's differences and points of view.
- **Openness** – we communicate and listen openly and frankly in a way that is honest and respectful. We share information with candour and empower our people with knowledge.





Students

Students may be vulnerable during the recruitment process, especially if they are persuaded to pay agents for application assistance or visa services that exceed the fees set by the Australian Government. Additionally, students face risks in their relationships with sponsors who provide fees and stipends, particularly if they are coerced into agreements that offer minimal financial support in exchange for admission sponsorship. To minimise the risk to students during the recruitment process, CDU only engages with reputable agents and also has some in-country representatives based in India, China, Vietnam and Indonesia to assist students with their application process. The in-country representatives also provide training for the local agents that help students with their submissions.

Many students, both domestic and international, support their university studies through employment. Some degree pathways require industry-related employment, while in other cases, CDU arranges work-related learning opportunities as part of the degree program or for general work experience. In all these situations, students may be at risk of very low wages and exploitative working conditions. CDU conducts appropriate due diligence on student placement agreements and partners only with reputable placement providers to mitigate the risk of students being unfairly treated. CDU's Work Integrating Learning Policy and CDU Host Organisation Agreement highlight the roles and responsibilities of placement providers to ensure a safe learning environment for students whilst on placement.

Risks in supply chain

CDU recognises that its supply chain may reveal instances of modern slavery, especially concerning materials produced in countries with a high prevalence of low-skilled labour, where modern slavery has been identified or is likely to occur.

CDU is also aware that modern slavery may occur within its domestically based supply chains with the highest risk sectors being information technology, cleaning and maintenance, and building construction.

Procurement of goods and services at CDU is governed by the Procurement Policy and Procedure. The policy enables departments to undertake their own purchasing requirements with relevant endorsement by senior staff/executives and specialists against four benchmark principles of procurement. One of the principles details the assessment of modern slavery risks.

Part D – Actions taken to assess and address risks (Criterion 4)

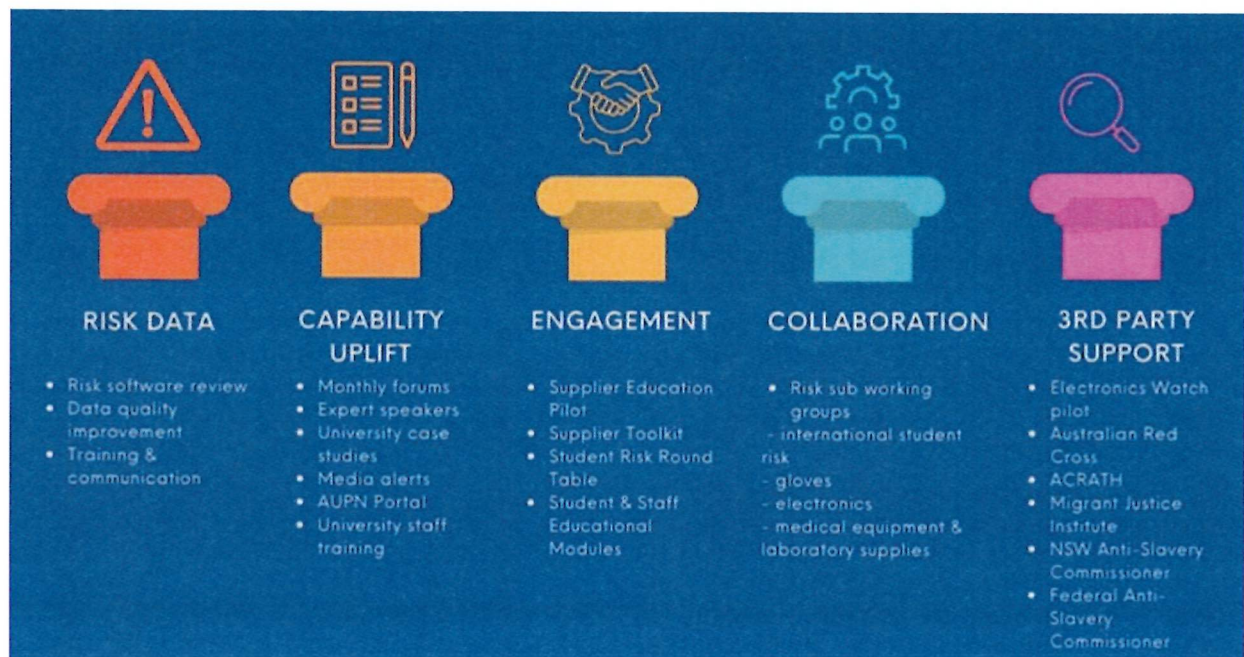
Our approach is founded on a culture of continuous improvement, ensuring that CDU comprehends our modern slavery risks. Key staff in the procurement team continue to receive monthly training and awareness to effectively identify and address these risks, and we integrate essential modern slavery principles into our contracts and procurement guidelines and equip student-facing staff with relevant information, enabling them to raise awareness of the realities of modern slavery that students may encounter. Staff are encouraged to promote student participation in the Student Advocate Program, which offers online training and group discussions to build knowledge, skills, and confidence in recognising and discussing modern slavery.

Our continuous focus is to enhance our core capabilities for the identification of and response to modern slavery risks.

Collaboration with the Australian University Procurement Network (AUPN)

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 our collective spend and market influence as well as expertise to maximize purchasing power, drive ethical procurement, and ensure compliance with the Modern Slavery Act 2018 (Cth).

In 2025, the AUPN Modern Slavery program operates under 5 program pillars:



1. Risk Data

AUPN's Modern Slavery Program undertakes sector-wide risk assessments to identify high-risk supply chain categories. In 2025, over 180,000 suppliers were reviewed across member universities, representing \$14 billion in spend. This supports targeted risk management and compliance with the *Modern Slavery Act 2018 (Cth)*, with focus areas including medical equipment, ICT, and international student recruitment.

2. Capability Uplift

The program builds sector capability through training and knowledge sharing. In 2025, nine forums addressed key topics such as ethical procurement and risk tools, supported by regular updates and case studies. ACRATH's *Educating for Change* micro-credentials - six free online modules - have been adopted by 32 universities, strengthening awareness and practical understanding.

3. Supplier Engagement

Supplier assessments in laboratory and medical consumables revealed varying levels of modern slavery awareness. In 2025, engagement focused on five higher-risk suppliers, alongside a detailed review of the medical gloves sector (to be finalised in 2026). In ICT, 22 universities participated in an Electronics Watch pilot covering 27 factories across seven countries. Risks identified included wages, safety, discrimination, excessive hours, and forced labour, with remediation underway.

4. Industry Collaboration

Collaboration remains central to the program. In 2025, 18 universities contributed over 150 responses to a temporary migrant survey, informing future guidance and identifying key risks and barriers. The International Student Risk Roundtable brought together 11 universities and sector experts to address risks across the student lifecycle.

5. Third Party Support

Partnerships with organisations such as ACRATH and Electronics Watch provide training, monitoring, and specialist expertise. These collaborations strengthen universities' ability to identify and address modern slavery risks.

The AUPN Modern Slavery Program continues to strengthen sector-wide capability through risk assessment, supplier engagement, and collaboration, with future priorities including expanded analytics, deeper supplier engagement, and guidance on student protections.





In addition to collaboration with AUPN, CDU undertook the following actions to address risks in 2025:

Student Support

There are a range of CDU support services available to students who may be experiencing exploitation or unsafe working conditions. They can access free and confidential emotional, psychological, and wellbeing support through our Counselling service and can access Student Advocacy services if the conditions experienced are in any way related to their studies at CDU (and warm referrals if they are not related). Students are able to access a CDU 24/7 Wellbeing Support Line to discuss and disclose anything that may be impacting their wellbeing and causing distress via phone or text. Depending on the nature of the exploitation or unsafe working conditions, a range of other supports may be possible i.e., Access and Inclusion where a student has experienced trauma or significant distress impacting mental health as a result of their experiences, where they can access reasonable adjustments, or Safer Communities where they are experiencing any form of gender-based violence. We have a Student Support representative (from Student Advocacy, Safer Communities, or Associate Director Student Support) who attends and contributes to the Northern Territory Anti-Trafficking Working Group which meets regularly throughout the year.

Student Orientation/onboarding

In our pre-arrival module, Successful Graduate, there is a section on Your Work and Internship Rights which outlines such areas as students having the same rights and payments as other workers in Australia, what an award/agreement means, the concept of minimum rate of pay and where to seek assistance if needed (Fair Work Ombudsman). At orientation sessions, we include information on workers' rights and how to

connect with the Fair Work Ombudsman. We also feature CDU Complaints services, the National Student Ombudsman (for information on confidential reporting processes internally and externally to CDU) and Darwin Legal Services as part of our community stalls program. Through workshops delivered early each semester the Careers Centre is committed to supporting safe, fair, and lawful employment experiences for students. We provide education about workplace rights and responsibilities, help students recognise exploitative practices, and advise students about Australian Fairwork Legislation and appropriate support services including the Fair Work Ombudsman where concerns arise.

Employee health and wellbeing

The People & Culture department at the University has conducted several information sessions for staff on employment provisions in the EA and has an employee assistance program.

Procurement and contracts

The University incorporates modern slavery provisions into its standard contract documents provided to all suppliers. These provisions require organisations supplying goods and services to CDU to:

- It must take reasonable steps to identify, assess and address the risks of Modern Slavery practices in the operations and supply chains used in the provision of the supplies.
- Conform with the goals and requirements of the *Modern Slavery Act*.
- Assure that neither they nor their subcontractors have been convicted of offenses involving modern slavery and, to the best of their knowledge, are not currently under investigation, review, or legal proceedings by any authority regarding such offenses.

Part E – Assessment of the effectiveness of actions (Criterion 5)

Throughout 2025, Charles Darwin University focused on strengthening the effectiveness of its approach to identifying, managing, and mitigating modern slavery risks across its operations and supply chains. Effectiveness is assessed through a combination of governance oversight, data quality, supplier risk visibility, internal capability uplift, and engagement outcomes.

CDU's ongoing participation in the Australian Universities Procurement Network (AUPN) Modern Slavery Program continues to play an important role in strengthening effectiveness. Insights gained through sector wide risk assessments, supplier questionnaires, and targeted category reviews inform CDU's internal risk management approach and procurement decision making. The University actively monitors outcomes arising from these initiatives, including supplier responses, engagement efforts, and identified remediation activities across the sector where relevant to CDU's supply base.

Internal capability uplift also remains a key indicator of effectiveness. In 2025, CDU delivered targeted modern slavery training to procurement and key professional staff, improving awareness of risk indicators and

strengthening the ability to identify and escalate potential concerns. Student facing staff were supported with tailored awareness resources and referral pathways to assist students who may be vulnerable to exploitation in employment or recruitment contexts.

Effectiveness is further monitored through governance and oversight mechanisms, including reporting to senior management and ongoing engagement with controlled entities. During 2025, CDU established a dedicated focus group to examine modern slavery risks across governance, procurement, student engagement, and workforce practices, supporting coordinated and consistent responses across the University.

CDU recognises that assessing effectiveness is an evolving process and that continued improvement is required. In future reporting periods, the University aims to strengthen outcome based measures, including tracking supplier engagement outcomes, contract coverage, training participation, and risk mitigation actions, to further demonstrate progress in embedding modern slavery risk management into core business practices.





Part F – Consultation with controlled entities (Criterion 6)

CDU's controlled entity, Menzies, was consulted during the development of this report. During the reporting period, consultation focused on gaining a better understanding of Menzies' operations and supply chains, including identifying suppliers of higher-risk goods and services. CDU also continued to engage with Menzies throughout 2025 through awareness initiatives.

Menzies continued monitoring its suppliers for modern slavery-related alerts, with minimal risks identified. In 2026, CDU will work with Menzies to embed reporting functionality from the new finance system, enabling the assignment of risk ratings to suppliers.





Part G – Other relevant information (Criterion 7)

We are dedicated to continuously adapting, improving, and reviewing our processes to meet our modern slavery obligations effectively. This commitment includes enhancing our collaborative efforts to ensure that our mechanisms for mitigating modern slavery risk are both sustainable and effective. In 2026, CDU will implement the following focused measures:

- Incorporate personnel from controlled entities into the AUPN Modern Slavery Program to increase awareness and promote consistent understanding of modern slavery risks and obligations across the organisation.
- Work with our controlled entities on a common reporting functionality from our respective finance systems.
- Continue engagement with controlled entities, stakeholders, including students.
- Improve staff awareness of modern slavery risks and improve capability via training and leveraging subject matter experts.
- Promote student-specific programs so that students can develop their knowledge, skills and confidence to have conversations about modern slavery and important human rights issues.
- Continue reviewing contract renewals and update those that require modern slavery provisions.
- Benchmark University's modern slavery statements to support continuous improvement.
- Commence drafting best practice guidelines and templates.

Part H – Conclusion

While Charles Darwin University considers the risk of modern slavery in its activities to be low, it is proactively working to fulfill its obligations under the *Modern Slavery Act*, especially regarding its supply chains, by actively identifying, managing, and reducing the risks.

We recognise that eliminating modern slavery requires a sustained and long-term commitment. While we have made particular progress in enhancing the maturity of our practices, continued strategic and focused efforts are essential to further advance our approach in the coming years. We remain dedicated to this cause and will persist in our efforts to ensure the highest standards of ethical practice throughout our operations and supply chains.

Approval

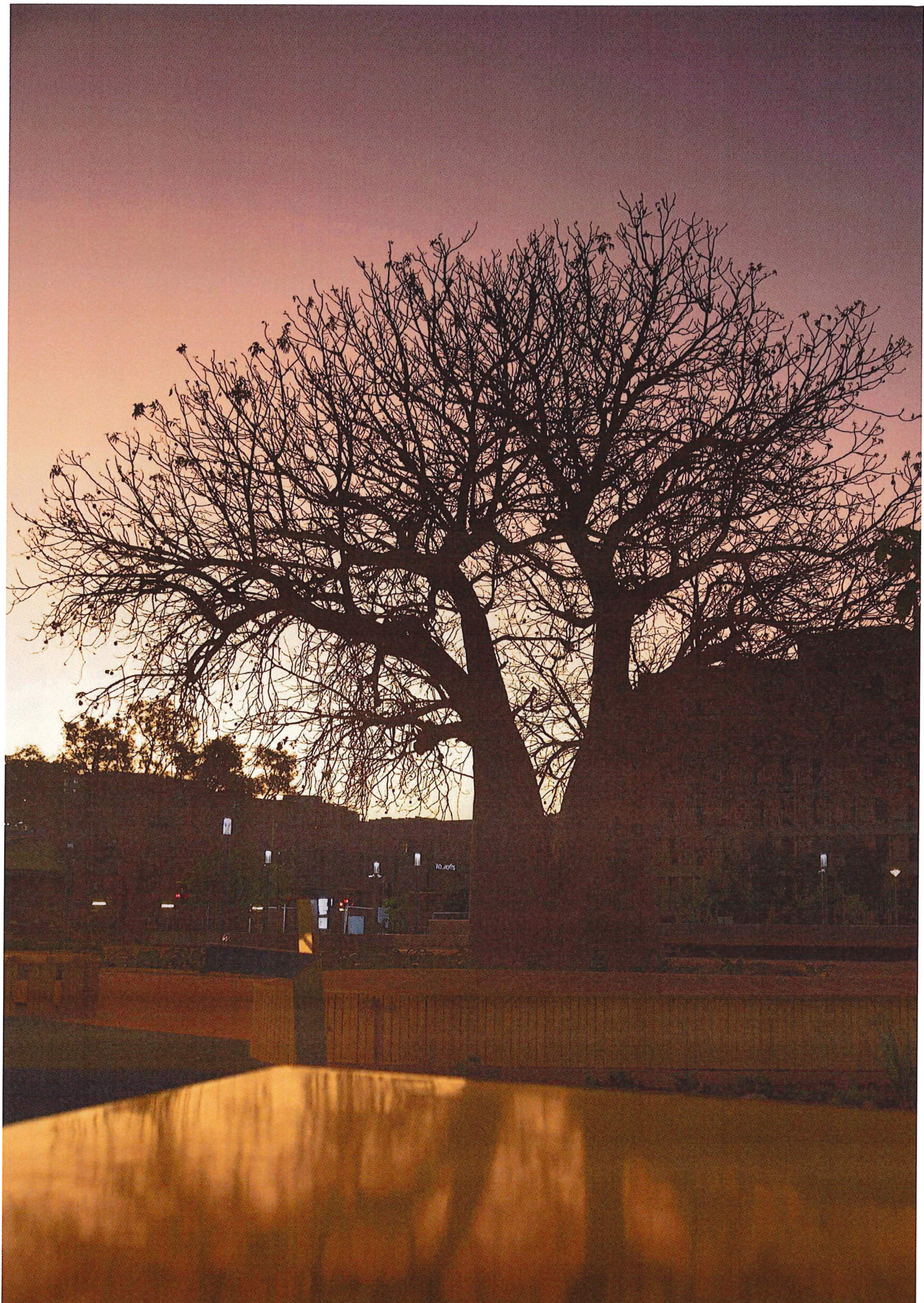
On the 11th June 2026 the CDU Council approved this Modern Slavery Statement for the year ending 31 December 2025 on behalf of CDU and its controlled entities pursuant to the *Modern Slavery Act 2018 (Cth)*.



The Hon. Trevor Riley AO
Chancellor



Professor Fiona Coulson AO
Interim Vice-Chancellor and President



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You make CDU



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