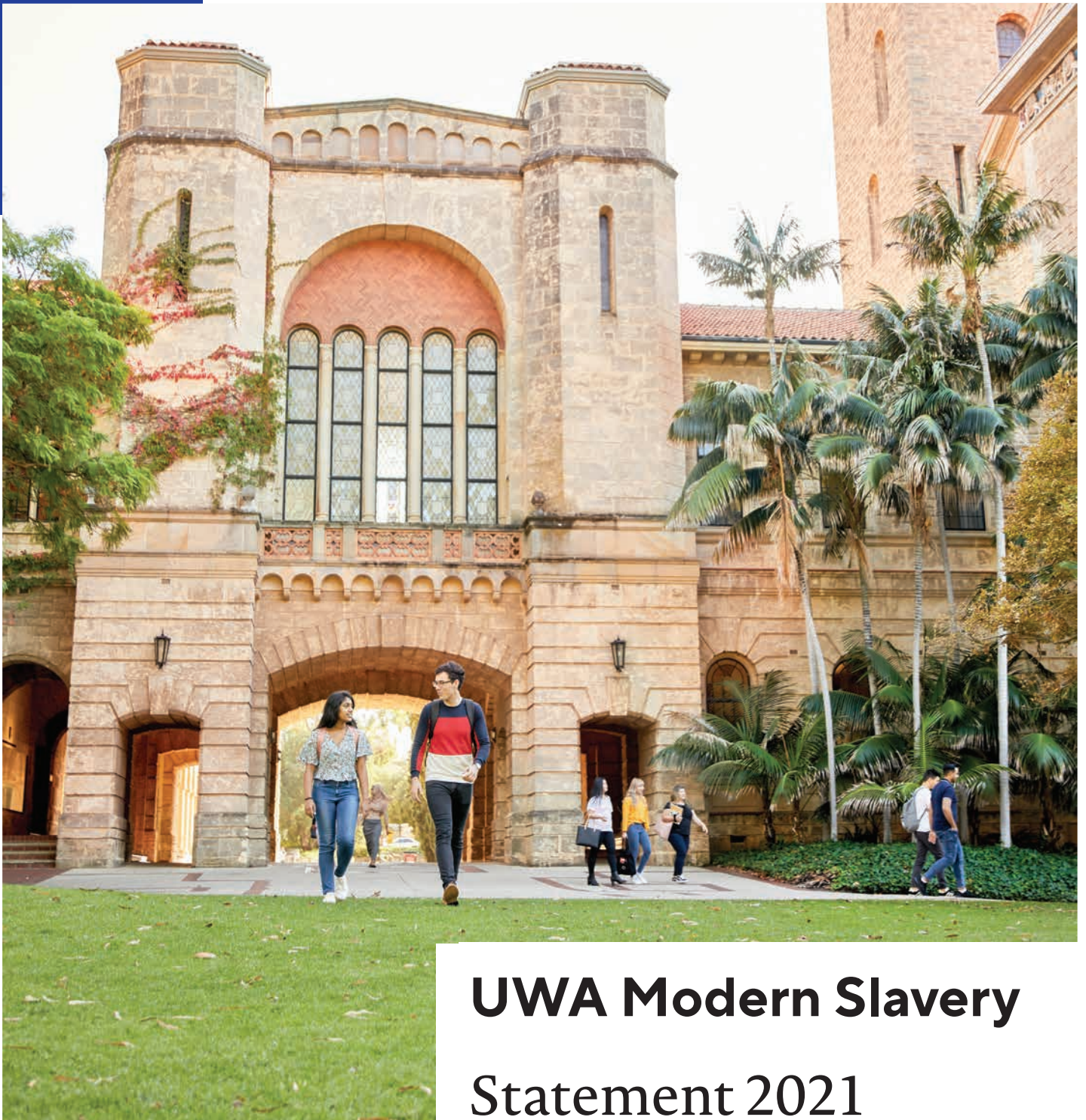




THE UNIVERSITY OF
**WESTERN
AUSTRALIA**



UWA Modern Slavery Statement 2021

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The University of Western Australia acknowledges that its campuses are situated on Noongar land, and that Noongar people remain the spiritual and cultural custodians of their land, and continue to practise their values, languages, beliefs and knowledge.

Opening Statement from the Vice-Chancellor

The Commonwealth Modern Slavery Act 2018 (Cth) (the Act) established Australia's national modern slavery reporting requirement. Under the reporting requirement, certain large entities must publish annual modern slavery statements describing their actions to assess and address modern slavery risks. The University of Western Australia (UWA) is a reporting entity under the requirements of the Act and we recognise our responsibility to address all forms of modern slavery associated with our operations and supply chains.

This Statement is the University's second Modern Slavery Statement, covering the period from January to December 2021 and encompassing UWA and its subsidiaries, including:

- The University Club of Western Australia Pty Ltd
- UWA Sport Pty Ltd
- UWA Accommodation Services Pty Ltd
- Perth International Arts Festival Ltd
- Young Lives Matter Foundation UWA Limited

This Statement has been prepared in consultation with the offices of each Executive portfolio and approved by the University's governing body, the Senate. It represents a commitment by the University at the highest level.

The University acknowledges the risk of modern slavery occurring in our operations and supply chains and is committed to continuously monitor, investigate and address these risks.

I thank and acknowledge the ongoing efforts of all staff and students in recognising and addressing modern slavery in all its guises.



Professor Amit Chakma
Vice-Chancellor

Executive Summary

The University is committed to its responsibility to staff, students, suppliers and community to ensure that modern slavery risks are identified and addressed within our operations and supply chains.

This Statement reflects that commitment and reports on the steps taken to assess and address the risks of modern slavery within our operations and supply chains for the period 1 January 2021 to 31 December 2021.

The University has undertaken assessment of our policies and practices through consultation and inquiry across the University, as well as surveys and analysis of our supply chains. While the risk of modern slavery within our operations and supply chains is deemed to be low, we will continue efforts to enhance and improve on our policies, practices and culture on modern slavery across the University.

The University is developing a three-year plan aimed at enhancing transparency and developing our assessment and reporting capabilities to actively manage risks of modern slavery within our operations and supply chains.

DEFINITION OF MODERN SLAVERY

Modern slavery is defined by the Department of Home Affairs as situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom.

The term modern slavery encompasses instances of human trafficking, slavery or slavery-like practices, debt bondage, forced labour, forced marriage and the worst forms of child labour.

The Global Slavery Index 2018 estimated that 40.3 million people globally were living in some form of modern slavery with over half of those identified as being subject to forced labour.

Despite the majority of countries declaring modern slavery illegal, very few G20 countries have formally enacted laws, policies or practices to stop business

and government sourcing goods and services produced by forced labour. Modern slavery still exists at an alarming and unacceptable scale.

APPROACH TO REVIEW AND DEVELOP OUR STATEMENT

The UWA Modern Slavery Working Group, comprising representatives across key operational areas, was established to lead the planning and implementation of programs and processes to identify and address the risk of modern slavery.

The Working Group operate under the direction of the Office of the Chief Financial Officer within the Executive group.

In developing this Statement, the University recognises that various facets of our operations may be subject to risk of modern slavery and accordingly, has engaged with our operational areas to identify current mitigations in place and future actions to address those risks.

These facets of our operations include:

- Current and future students
- Employees
- Investments
- Supply chain
- Subsidiaries

This Statement recognises areas of risk within our supply chain which have been assessed through targeted analysis encompassing geographical location and spend analytics of high risk supply categories, being Facilities Management (incorporating construction), Information and Communication Technologies and Equipment and Consumables. The Statement has benefitted from our collaboration with the Australian Universities Procurement Network and the UWA Modern Slavery Research Cluster.

Through this engagement, collaboration and analysis, the University has assessed our overall modern slavery risk rating as low. The University does however acknowledge the work yet to be done to fully interrogate and mitigate these risks

and to remediate any occurrences of modern slavery should they be identified. A three-year plan is being developed to expand the breadth and depth of the scope reported within the Statement.

2021 HIGHLIGHTS

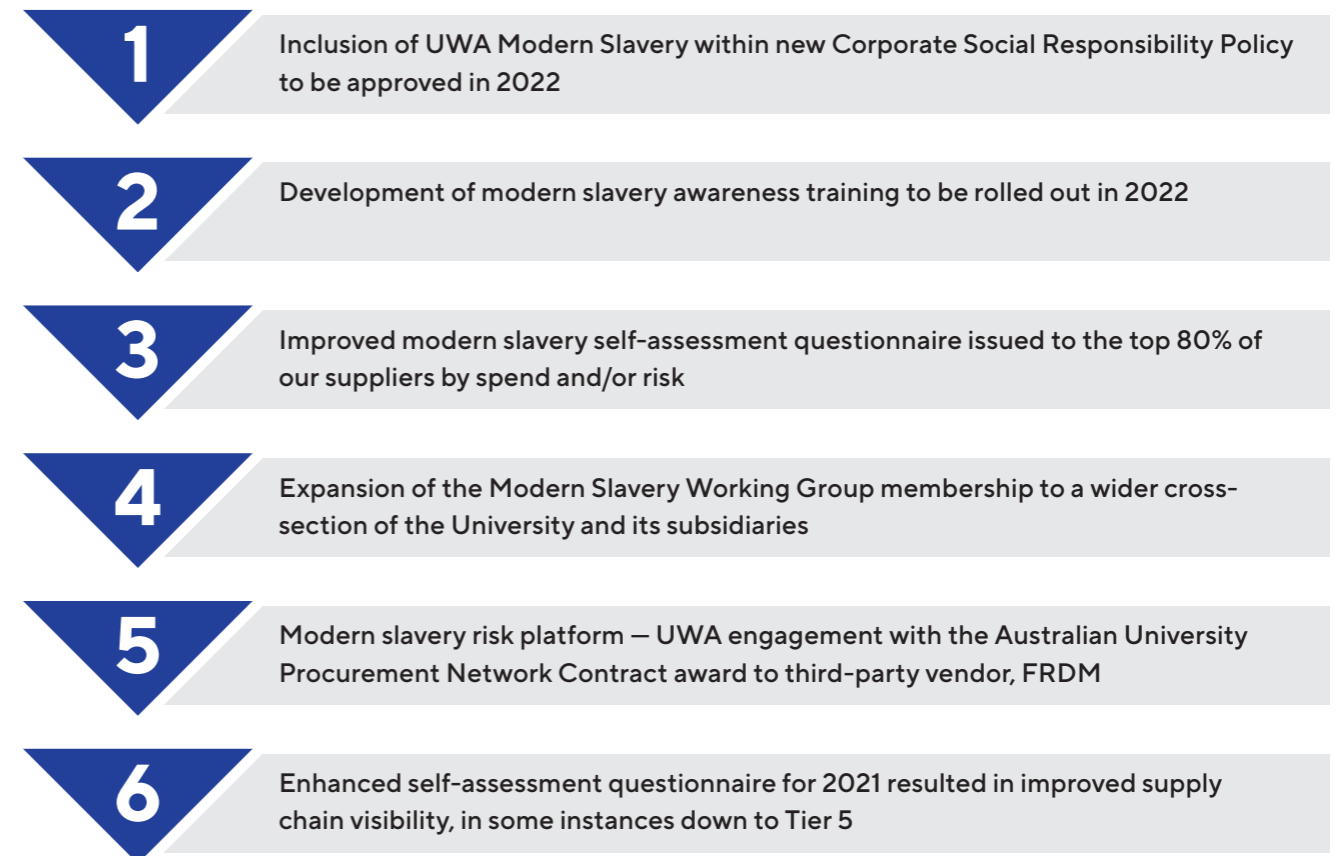


Figure 1. UWA modern slavery highlights 2021



Our University Structure, Operations and Supply Chains

ABOUT UWA

Established in 1911 as the State's first university, The University of Western Australia (UWA) was also the first free university in the British Empire, actively promoting equal access to tertiary education for all social classes. Today UWA is ranked in the world's top 100 universities and number one in Western Australia.

UWA has an international reputation for remarkable and life-changing contributions across research, learning and teaching. In 2021, UWA educated more than 25,000 students from across 100 countries.

As one of Australia's leading research-intensive universities UWA operates more than 40 intensive research centres and 22 schools, in addition to having a broad range of successful industry partnerships.

The University is a member of the internationally recognised Australian Group of Eight universities and a foundation member of the Matariki Network of high-quality, research-intensive universities with a particular focus on student experience.

UWA has a strong connection to industry and government, supports communities both locally and internationally, and is driven to make the most of its collective potential and contribute to the world's advancement.

Our Locations

Perth/Crawley campus

Set on 65-hectares, UWA's historic main campus sits on the banks of the Swan River, next to Kings Park and just minutes from Perth's central business district, with additional facilities in Claremont and Nedlands.

UWA Health Campus

Located at the Queen Elizabeth II Medical Centre grounds in Nedlands, the UWA Health Campus connects students and researchers with hospitals, medical research institutes and healthcare providers.

UWA Albany Centre

Based in the state's Great Southern region and situated in a biodiversity hotspot, the UWA Albany Centre allows students to experience all that regional WA has to offer. In addition to being able to complete an undergraduate degree in the region, there are opportunities for students to participate in research projects in the fields of environmental research and wave energy.

OUR AREAS OF STUDY

The University offers its students tertiary degrees in the following 12 areas of study:

- Agriculture, Environmental and Biological Sciences
- Architecture, Design and Planning
- Business and Commerce
- Data and Computer Science
- Education
- Engineering
- Health and Biomedical Sciences
- Humanities and Social Sciences
- Law
- Music and Fine Arts
- Physical Sciences and Mathematics
- Psychology

Our Research Institutes and Centres

Collaboration through Research Institutes and Centres from large-scale multidisciplinary collaboration in institutes, to more focused research centres, UWA staff partner with industry, government and researchers globally to help solve not only today's problems, but those of the future.

For a full list of Research Institutes, Centres, CRC Centres of Excellence, Collaborative Centres, Affiliated Research Institutes, School Endorsed Groups and Research Infrastructure Centres visit the [UWA Research and Institutes website](#).

Mission

To provide world-class education, research and community engagement for the advancement of the prosperity and welfare of our communities.

Vision

Creating the next generation of global leaders through experience-rich education and world-leading, trustworthy research.

Motto

Seek Wisdom

Our Promise

As a university we will:

- Prepare our students to be globally relevant and responsible leaders
- Enable and promote trustworthy and influential research
- Build just and equitable societies
- Work closely with our communities to improve our environment
- Recognise and value Indigenous peoples' rights, knowledge, culture and values

Values

Excellence

We consistently pursue the highest levels of achievement, creating the best outcomes possible.

Integrity

We are honest and ethical and show respect for, and appreciate, each other, our partners and our communities – valuing our differences.

Innovation

We are constantly, and creatively, improving and adapting.

Collaboration

We share our collective intelligence to achieve more.

Equity

We are committed to providing everyone at UWA equality of opportunity, experience and access.

OUR GOVERNANCE

Senate

The University of Western Australia Act 1911 gives the Senate powers to act in the interests of the University through the making of statutes, regulations, and by-laws and through the management of income and expenditure. It provides powers of delegation for the Senate, so that day-to-day management can be delegated to officers employed by UWA.

UWA is responsible to the State Minister for Education for the proper conduct of its business under the State legislation. However, the majority of our funding is invested by the Commonwealth and UWA is therefore responsible to the Commonwealth Minister for Education for the delivery of our teaching and research programs, and for the provision of adequate infrastructure to support those programs.

Senate membership and information on the number of meetings held can be found on the [UWA governance website](#).

Executive

The Senate appoints the Vice-Chancellor and works in partnership with the incumbent in this role to maximise the University's capacity and performance, and to ensure our fiscal viability.

The Vice-Chancellor is delegated operational responsibility of the University. The Vice-Chancellor appoints an executive group to assist with responsibilities for the academic, financial, administrative and other business of the University.

OUR OPERATIONS

As a higher education institution, UWA's core activities of teaching, research and community engagement are highly dependent on the calibre and integrity of its people. The University therefore, has a responsibility to ensure that its workforce and students are provided with safeguards and mechanisms to mitigate modern slavery risks.

Education

UWA students actively engage in a learning experience delivered through our flexible course structure that includes engagement in service learning and opportunities to provide input and feedback on their experience at UWA.

Responsibility for the quality and delivery of education at UWA primarily lies with our schools. They design and deliver courses and units and are accountable for quality of teaching and student satisfaction with their educational experience. The Deputy Vice-Chancellor (Education) leads the University's academic programs and education mission.

Research and Innovation

UWA has acquired an international reputation for excellence and enterprise in its research impact. It is regarded as one of Australia's top research institutions, attracting researchers of world standing across the range of disciplines, with international leaders in many diverse fields.

Responsibility for the quality and delivery of research at UWA lies with our schools, institutes and centres. They foster collaborative and multidisciplinary research teams that resolve real-world challenges that are critical to the planet and its people. The Deputy Vice-Chancellor (Research) leads the University's research mission and programs.

Global Partnerships

UWA is passionate about its partnerships and creating positive change for the wider community. It embodies this through support for a wide range of initiatives in key development areas of art, culture, sport, education and philanthropy.

Sustainable Environments

UWA is recognised as one of the most beautiful campuses in the world with our 'campus in a park' ethos, the carefully planned and executed heritage landscape and biodiversity is treasured by our staff, students and the wider community.

Management of UWA's sustainable environments, including our campus planning, capital development and the operations and maintenance of its grounds and facilities is the responsibility of Campus Management under the leadership of the Senior Deputy Vice-Chancellor.

With the continued practice of online learning and working from home, the digital environment was recognised as a vital part of University operations. Looking forward, it is recognised that off-campus support of both students and staff is likely to require increased attention. Our focus on information technology and complementary on-campus learning and working requirements will be further developed to support that evolution.



OUR SUPPLY CHAIN

Our procurement activities apply to the acquisition of goods and services, whether purchased or leased, for all business units, across all sources of funding. These activities are guided by our procurement principles of probity, fair competition, value for money, sustainable procurement and risk managed procurement.

Procurement activities are informed by the Finance Policy and the Procurement Financial Control Document. Looking forward, purchases that are assessed through the UWA risk management toolkit to be high risk will undergo a formal tender process irrespective of the total dollar value of the resulting contract.

UWA non-employee related annual spend for 2021 was \$326 million, across 3,750 vendors through active contracts, purchase orders or credit card expenditure ranging from one-off research equipment purchases to large value, multi-year contracts.

UWA classifies its external spend across six key category areas to support those varied business needs of its College of Schools as well as the operational business units.

UWA is committed to transparency across our processes and policies to drive up standards and highlight issues across our supply chain. UWA recognises the need for continuous improvement in the identification of risks beyond Tier 1 suppliers, the influence exerted in the actions we take to remediate, and the development of our people and culture to further understand and address modern slavery in our procurement and operations.

UWA is informed by and adheres to the ever-increasing body of advice available through the Australian government and market leaders in the identification and mitigation of modern slavery in Australian supply chains across all industries.

More specifically, UWA's engagement with the Australian University Procurement Network (AUPN) and the initiatives developed by the AUPN Modern Slavery Working Group serves to inform the University's approach to dealing with modern slavery independently but also from an industry platform, leveraging the collective procurement spend of approximately \$16 billion annually across 38 participating universities.

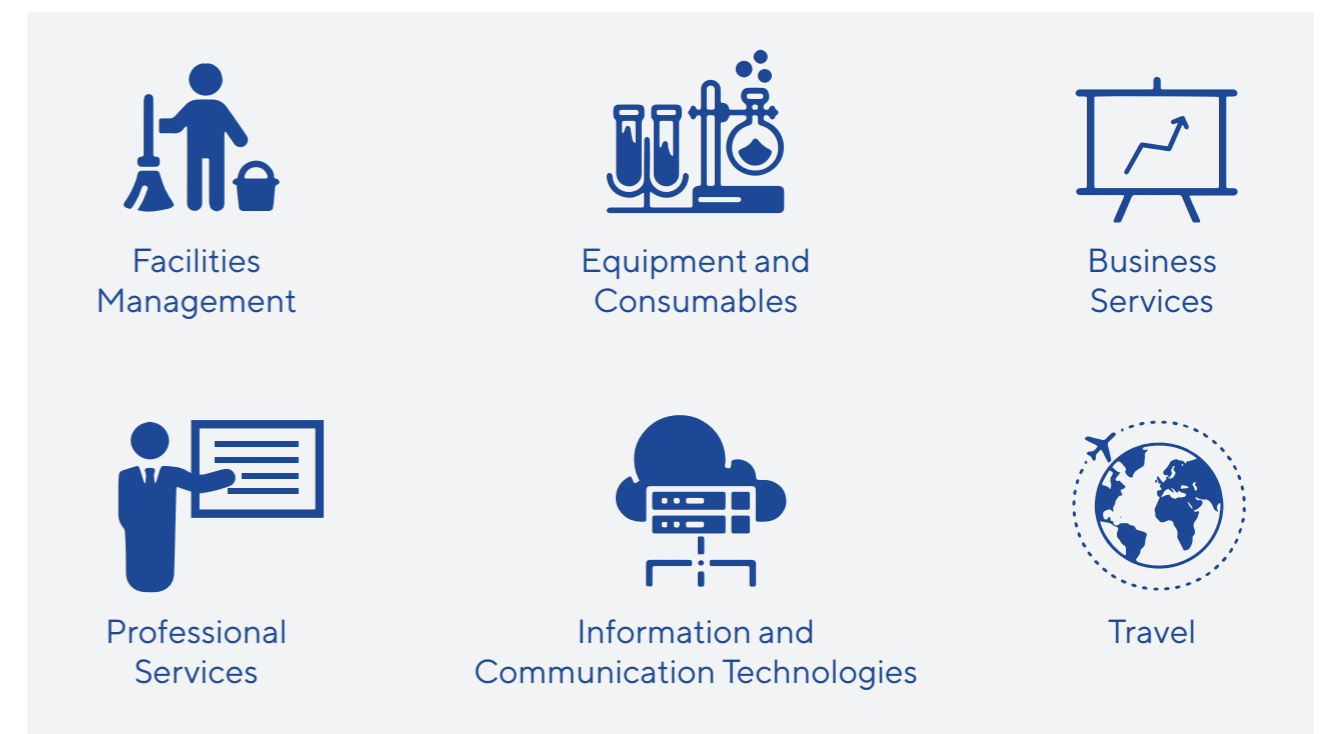


Figure 2: UWA Procurement categories

Risks of Modern Slavery Practices in Our Operations and Supply Chains

Using the data and information available from our supply chain and through our wider consultation processes with our directorates, schools and subsidiaries, UWA assesses our risk of modern slavery in our operations and supply chain at this time to be low.

OUR STUDENTS

In 2021, 27,116 students were enrolled at UWA, with an equivalent full-time student load of 19,756.

UWA implements a range of policy and procedures upholding the rights and freedoms of all our students in line with national legislation and international commitments.

The [University Charter of Student Rights and Responsibilities](#) sets out the fundamental rights and responsibilities of students and their organisations at UWA.

Within the Office of the Deputy Vice-Chancellor (Education), **Student Life** encompasses services to students across student administration functions from enrolment through to graduation. Health and wellbeing services, social and academic support and the provision of participation opportunities through dedicated student equity programs.

University Hall provides a comprehensive on-campus residential student experience. Additional off-campus accommodation services, childcare services and sport and recreation programs, activities and clubs are provided through affiliate relationships also reporting into the Student Life portfolio. Supply chains in key aspects of the Student Life portfolio are managed through University delivered procurement and purchasing services including student employees, who are recruited under relevant Awards and UWA processes.

Student classroom learning is supported via experiential learning opportunities facilitated by the University through:

- paid and unpaid placements/internships - undertaken for both credit and not-for-credit
- overseas placements with host organisations
- placements undertaken via third-party providers.

University approved Student Placement Agreements comprise obligations under the *Fair Work Act 2009* (Cth) and students are counselled prior to embarking on Placement Agreements. International students are also supported through the provision of a dedicated International Student Support team, which includes an identified advisor for students with federal scholarships through the Department of Foreign Affairs and Trade and third-party sponsorship agreements.

OUR EMPLOYEES

In 2021, UWA's full-time staff equivalent was 3,270 with 3,786 employees employed by the University.

UWA's terms and conditions of employment, which are set out in employment contracts and Enterprise Agreements, meet all relevant legislative and common law obligations and provided to all employees when they are engaged by UWA. At a minimum, the engagement of employees at the University complies with the *Fair Work Act 2009* (Cth) and any other relevant legislation.

The vast majority of University employees' employment is governed by one of the University's Enterprise Agreements:

- The University of Western Australia Academic Employees Agreement 2017
- The University of Western Australia Professional and General Employees Agreement 2017
- The University of Western Australia ELICOS Teachers Agreement 2018
- The University of Western Australia Child Care Employees' Collective Agreement 2015

(collectively, **the Enterprise Agreements**).

These Enterprise Agreements provide the minimum terms and conditions of employment, for the individuals covered by them. Each of the Enterprise Agreements have been approved by the Fair Work Commission.

Senior employees have individual employment contracts which are drafted to comply with current legislation.

UWA does not tolerate slavery, human trafficking, child or forced labour of any kind and has a suite of policies, procedures and practices in place which assist in managing human rights, promoting diversity and ensuring compliance with relevant legislation.

UWA has a comprehensive people-focused policy suite that provides protection for prospective employees (during recruitment and selection), and for employees during their employment. These policies are designed to ensure a safe working environment, protection from mistreatment at work, and aim to provide a workplace free of intimidation,

threats, actual or threatened physical and/or sexual violence, forced labour and abusive working conditions.

These UWA policies include:

- Selection for Appointment
- Academic Appointments
- Immigration
- Casual Appointments Academic
- Casual Employment Professional and General
- **University Code of Conduct and Code of Ethics**
- Flexible Work and Leave Practices
- Hours of Work
- Parental Leave (including Partner Leave)
- Research Integrity
- Home Based Work
- Managing Misconduct
- Professional Relationships in the Workplace
- Sexual Misconduct
- Prevention and Resolution of Bullying on Campus
- Public Interest Disclosures - **Whistle-blower Process**

Policies are available to employees through the [University's Policy Library](#). Employees are required to comply with the University's policies at all times. Any failure to do so may result in disciplinary action.

There are also a range of mechanisms in place for employees to make enquiries or complaints regarding their employment without fear of prejudice or adverse consequence.

UWA has a dedicated Human Resources team to assist employees with enquiries or complaints, and if employees remain unsatisfied or do not feel comfortable to approach Human Resources, then they are able to lodge a dispute or grievance under the Enterprise Agreements.



OUR SUPPLY CHAIN

Geographic Risks

The Global Slavery Index 2018 presents national-level estimates for 167 countries based on the proportion of the population that is estimated to be in some form of modern slavery. The 10 countries with the highest prevalence of modern slavery are identified in Figure 3 below. Pakistan was one of the countries to score above 90 per cent in the Vulnerability Model which measures systematic, individual and environmental risk factors.

In 2021, analysis provided by the FRDM modern slavery risk management tool evaluated risk of modern slavery in identified UWA spend with vendors in Pakistan. This was revealed through a deep dive by the FRDM tool to evaluate the risk of modern slavery beyond Tier 1 suppliers. The services engaged represent 0.004 per cent of the annual non-employee expenditure for the 2021 reporting period. The area of spend, marketing and media services, which falls under the UWA spend category within one of our schools was deemed to be low risk.

As the data available to the FRDM tool improves and the capabilities of the tool advances, UWA anticipates a greatly increased opportunity to identify geographic risks of modern slavery within our supply chain. In the interim period, UWA has analysed the country of purchase based upon registered location provided by suppliers and have identified over 99 per cent of our spend is purchased from suppliers located in low risk geographic locations. Additionally, data from the improved Supplier Self-Assessment Questionnaire indicated a low risk beyond Tier 1 for those entities that responded.

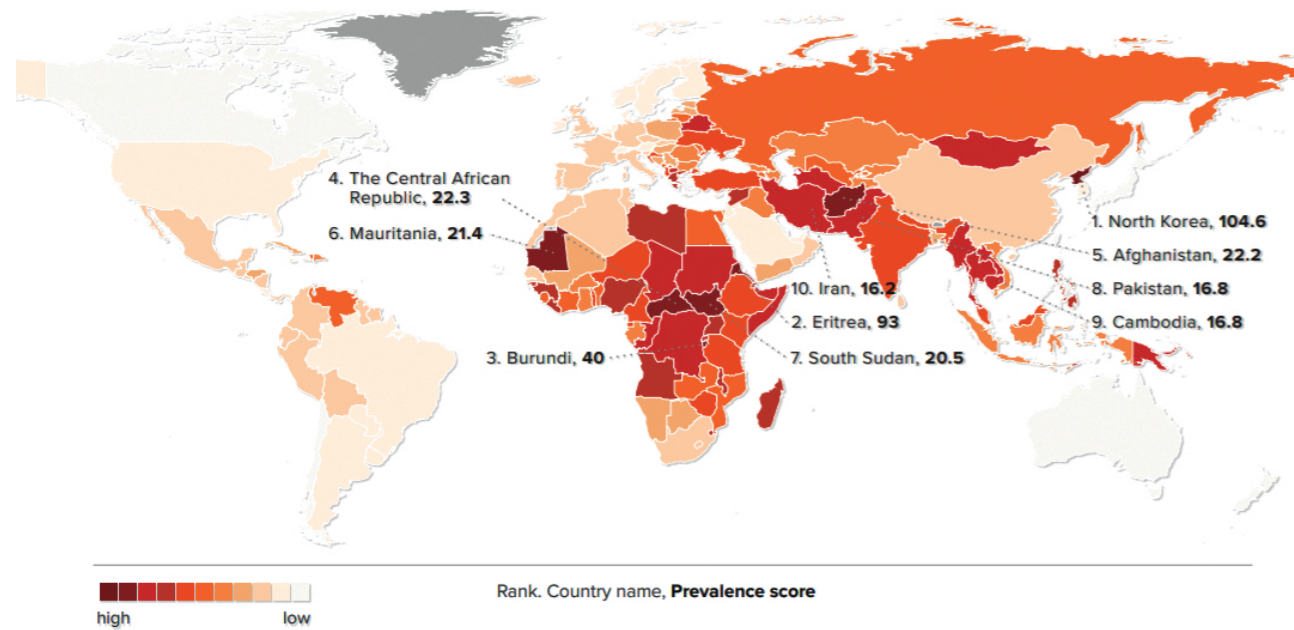
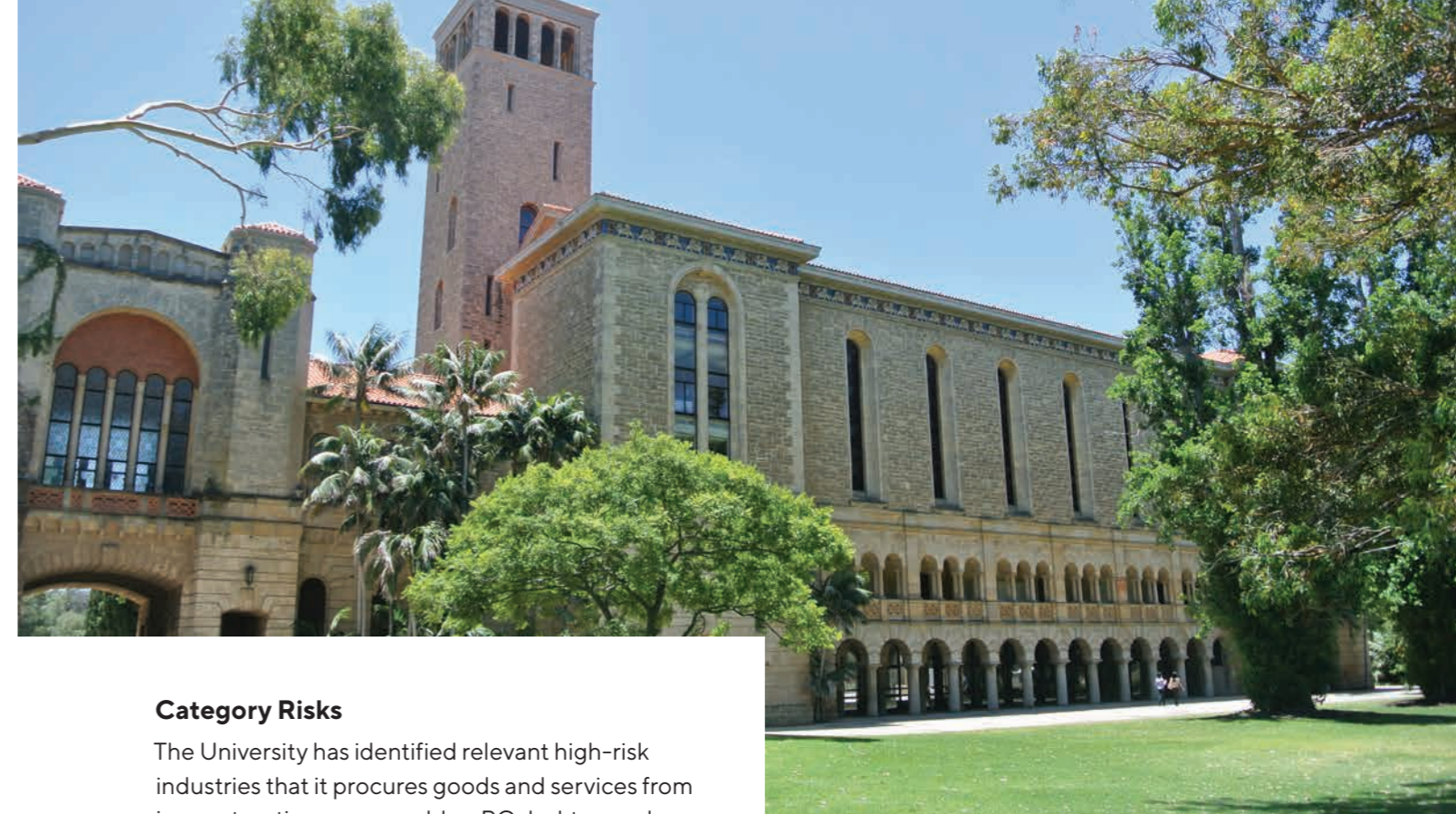


Figure 3: Estimated prevalence of modern slavery by country (noting 10 countries with highest prevalence, estimated victims per 1,000 population)



Category Risks

The University has identified relevant high-risk industries that it procures goods and services from in construction, consumables, PC desktop and notebooks, cleaning and waste, and security.

Through further engagement with UWA subsidiaries, specifically UWA Sport and the University Club of Western Australia, UWA has also identified potential risk categories of spend in the garment manufacturing industry, the manufacture of gym equipment and food industries.

Procurement Process Risks

UWA has worked collaboratively through its Modern Slavery Working Group and the AUPN to identify further improvement opportunities to our current processes and practices. These have been captured and prioritised in the UWA Modern Slavery three-year plan that is being developed. Activities identified to date include:

- Development of modern slavery KPI's for inclusion in supplier contractual agreements
- Inclusion of modern slavery evaluation criteria in tender documentation and associated due diligence processes
- Development of a modern slavery risk assessment tool and remediation process
- Development and delivery of modern slavery awareness training.

COVID-19 Risks

"The COVID-19 pandemic is a public health emergency – but it is far more. It is an economic crisis. A social crisis. And a human crisis that is fast becoming a human rights crisis." *Antonio Guterres, Secretary-General, United Nations*

The risks of modern slavery caused by the pandemic have seen increased vulnerability of migrant workers who find themselves suddenly jobless and stranded due to lockdowns and travel restrictions. Their vulnerability is further compounded by restricted access to testing, healthcare and sick leave causing higher transmission and, in some countries, reduced scrutiny of labour standards leading to increased instances of forced labour, debt bondage, human trafficking and modern slavery practices.

While these risks are more prevalent beyond Tier 1, UWA also recognises the risk to spend categories such as cleaning and security. Industries including, agriculture, health, fishing and garments are amongst those specifically identified by the Walk Free publication *Protecting people in a Pandemic* and also fall into UWA categories of spend.

Actions Taken to Assess and Address Risks

OUR MODERN SLAVERY WORKING GROUP

The role of the Modern Slavery Working Group is to provide a governance structure, under the direction of the Office of the Chief Financial Officer to address the risk of modern slavery.

Under this framework the Working Group identified areas across the University's operations and supply chains with potential exposure to the risk of modern slavery and engaged with representatives from a broad cross-section of the University to enable adequate understanding and oversight of those risks.

The Working Group comprises:

- Governance
- Legal
- Finance
- Human Resources
- UWA Modern Slavery Research Cluster
- Student Life
- Campus Management
- The University Club of Western Australia
- UWA Sport
- Perth Festival
- Young Lives Matter Foundation
- UWA Accommodation
- Complaints Resolution Unit

This Working Group and the identified representatives are responsible for the coordination and preparation of this Statement as well as the future planning and oversight of modern slavery risk mitigations and remedies.

The Working Group is working towards finalising the development of the University's three-year plan to meet those responsibilities. In accordance with UWA's commitment to continuous improvement, it will be an agile plan. This will enable the University

to re-prioritise actions to meet the needs of the business and to ensure the focus of the activities align with current and future legislative requirements in modern slavery reporting.

OUR STUDENTS

Managing modern slavery risks for our students

The primary risk of student exploitation exists across arrangements in which students independently enter into unpaid placements or internships that are not-for-credit with external organisations.

For international students this also includes employment in Australia, which may be exploitative, or involve sophisticated scams that could result in modern slavery.

Elevated risk has been identified across placements undertaken with host organisations overseas, placements undertaken via third party providers, and external employment arrangements for international students and potential scams.

UWA is working towards developing appraisal processes of independent providers of work experience and placement opportunities. It is intended that prior to approval, third party providers of co-curricular activities seeking official badging recognition are asked to self-declare their observance of guidelines under the *Modern Slavery Act* and publication on the Modern Slavery Register (as applicable). To mitigate risk and raise awareness of exploitation, UWA advises international students of the potential risks when undertaking employment in Australia during their orientation and onboarding. UWA also provides information of ongoing support services available.

Managing modern slavery risks in student recruitment

As well as ensuring employees are aware of their obligations to comply with UWA policies, the

University seeks to ensure that legal obligations are complied with at every stage of the employment life cycle from recruitment and onboarding to employment.

UWA seeks to undertake due diligence on scholarship/sponsorship body/organisation/individual (entity) with whom UWA enters into a contract.

Should the due diligence or any review during the duration of agreement identify concerns or acts of modern slavery, UWA is committed to appropriately addressing these with the contracted party.

UWA Future Students Recruitment portfolio within the Office of the Deputy Vice-Chancellor (Education) ensures compliance with Education Services for Overseas Students (ESOS) and ESOS National Code, working only with education agents and third parties who have been vetted, and who have references from other tertiary institutions.

UWA's in-market teams, agents and on-campus staff advise students appropriately of their rights and obligations and respond promptly to and investigate complaints or concerns students raise. The University's engagement network with other Australian institutions such as the Australian Universities and the International Directors Forum, also allows for broader awareness and identification of any industry concerns of modern slavery.

Student Services and Engagement

UWA reviews all advertisements prior to publishing to students via CareerHub. These are reviewed with consideration to ensure meaningful employment, clear when it is volunteering, or an internship/ placement in accordance with the *Fair Work Act*.

All Work Integrated Learning (WIL) placements are assessed by the WIL team or associated placements office. Students are only placed where there is a formal agreement between the host and the University in effect. There are several check-in points with students on their placements and a post-placement evaluation.

UWA is monitored through the TEQSA compliance framework with regard to universities meeting their obligations under ESOS and the National Code. UWA undertook an external review late 2021 which confirmed "...the University's systems, and

processes of its international student program, in all significant aspects, are adequate to ensure the University is compliant with the National Code."

OUR EMPLOYEES

Managing modern slavery risks in employment as well as ensuring employees are aware of their obligations to comply with UWA policies, the University ensures that all legal obligations are complied with at every stage of the employment life cycle from recruitment and onboarding to employment.

UWA does not charge employees for the costs associated with their recruitment or engagement, and ensures employees have the appropriate working rights to work in the country within which they are working.

The University is committed to continuous improvement and will conduct reviews of its employment policies to ensure ongoing compliance with the relevant legislation and minimise risks of modern slavery in its workforce.

This will be done through a review of all employment policies in 2022. The University will also continue to review and update its policies to incorporate any changes to the legislation as needed.

To minimise the risks associated with unpaid appointments (volunteering, vocational placements or work experience), the University is committed to assessing its current practice over the next three years and introduce appropriate mechanisms to ensure a person is a genuine volunteer or intern and would not be entitled to payments or other entitlements under the University's Enterprise Agreements or policies.

OUR INVESTMENTS

The University has Environmental, Social and Governance (ESG) risks and considerations outlined in its Investment Policy Statement (IPS), this incorporates the requirements of the University under the *Modern Slavery Act* and the expectations of our Implemented Consultant and Investment Manager(s) to assess and address this risk and report on the issue in line with the regulations and with the IPS policy.

OUR SUPPLY CHAIN

Vendor Evaluation

UWA enhanced its modern slavery questionnaire distributed to the top 80 per cent spend category vendors. Selected vendors assessed through the UWA Risk Management toolkit within high-risk industries and services were also requested to complete the questionnaire regardless of total spend.

The University analysed the spend category breakdown of the top 80 per cent spend. This high level analysis identified the high-risk categories of Facilities Management (including construction, cleaning and security), PC Desktop/Notebook and Consumables (including medical equipment suppliers) and represented 29 per cent of the total non-employee related spend in 2021 as shown in Figure 4.

UWA Category Spend 2021 – High Risk Categories

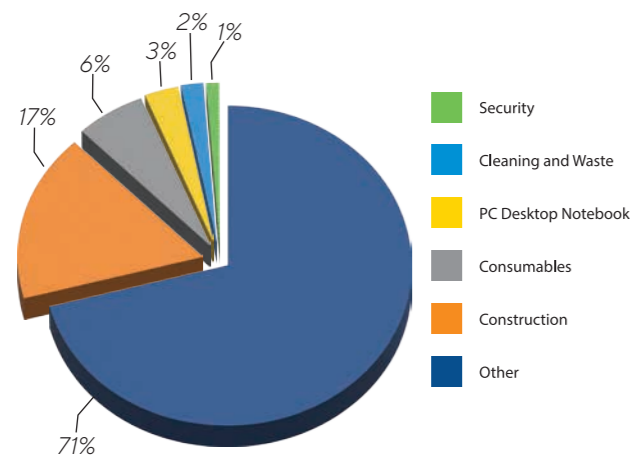


Figure 4: Top 80 per cent spend categorised as percentage of total non-employee spend 2021

The University assessed the geographical risk of vendors in the top 80 per cent spend as shown in Figure 5. The geographic risk by countries of purchase in 2021 for Tier 1 suppliers was almost 100 per cent low risk.

Country of Purchase	Percentage of Total Spend
Australia	99.733%
China	0.038%
Germany	0.003%
Indonesia	0.002%
Ireland	0.001%
New Zealand	0.061%
Singapore	0.006%
United Kingdom	0.007%
United States	0.148%

Figure 5: Geographic risk of vendors in the top 80 per cent spend 2021

COVID-19

Operations and global supply chains continued to be drastically affected by the COVID-19 pandemic. UWA is committed to responsible sourcing and has worked to identify industry spend which may be affected by the increased risks caused by the pandemic. For contracts for spend areas such as cleaning and security, UWA will continue to maintain its supplier relationships and open communications around any COVID-19 risks to its supply chain.

AUPN Engagement and Modern Slavery Risk Platform

UWA participated as a member of the AUPN in their Modern Slavery program, which provides synergy with other universities in making a larger impact in identifying and addressing modern slavery in our supply chains. AUPN awarded a contract to FRDM to introduce the FRDM modern slavery risk platform to its members.

UWA Procurement has actively sought to upskill its team in understanding modern slavery, the legislation surrounding modern slavery and the ramifications to our supply chain and operations. This has been, and will continue to be, achieved through collaboration with the AUPN, through participation in forums, webinars and conferences

and through extensive research of publications, toolkits and assessments provided by independent bodies such as Walk Free, Fair Supply and Unchained Solutions.

The resulting knowledge bank is shared across UWA via the UWA Modern Slavery Working Group and the initiatives identified by that group.



Assessment of the Effectiveness of Our Actions

OUR STUDENTS

The University is satisfied that its current policies and procedures have been effective in minimising risks of modern slavery to the student body. To date, the University has not identified any instances of modern slavery and has not received any grievances from any prospective or current students that they may have been subject to modern slavery.

OUR EMPLOYEES

The University is satisfied that its current policies and procedures have been effective in minimising risks of modern slavery in its workforce. To date, the University has not yet identified any instances of modern slavery and has not received any grievances from any prospective employees or current employees that they may have been subject to modern slavery.

OUR SUPPLY CHAIN

Supplier Self-Assessment Questionnaire (SAQ)

In 2021 UWA achieved an SAQ response of 32 per cent, an increase of 11 per cent from 2020. A non-response rate of 68 per cent clearly identifies that there are still many gaps to be addressed with respect to understanding the importance of modern slavery assessment and mitigation amongst our suppliers. Lessons learnt through this process will be applied in 2022 to increase the response rate and value of the data received. A key element of this improvement is the partnership with the AUPN and the planned rollout through FRDM of a centralised SAQ process. The percentage of suppliers conducting due diligence and training, and with a remediation process in place is encouraging. However only 10 per cent identified having risks

in their supply chain which suggests their current processes for identification, like many other entities new to these reporting requirements, are limited to Tier 1.

As part of the enhancements to the SAQ in 2021, the University requested suppliers identify the location of sourcing and manufacture of the items they provided. This enabled the University to not only report on the practices of suppliers with regard to their approach to mitigating modern slavery as a Tier 1 supplier to the University, but also provided insights into their deeper supply chain, in some instances down to Tier 5. It was identified that 86 per cent of the Tier 1 goods and services provided to the University were deemed to be manufactured in countries with a low risk categorisation for instances of modern slavery.

Looking forward, UWA reporting for 2022 and beyond will be further enhanced through the development of an SAQ in the AUPN FRDM tool. The AUPN Modern Slavery Working Group intend to begin work towards a single SAQ to be issued via the FRDM tool in 2022. This collaborative approach across the 38 participating universities will reduce the resistance in the market to the multiple SAQ's issued for completion. It will act as a one stop shop for responding to all the universities, will be run through the FRDM tool, and will enhance industry insights into our respective supply chains.

UWA Modern Slavery Three-Year Plan

As a reporting entity and as an institute of learning it is vital that a university endeavours to lead the way in terms of best practice in their own practices, policies and procedures but also encourages and builds relationships further down the supply chain to address modern slavery and the wider ESG responsibilities.

Through the development of the UWA three-year plan and through the AUPN engagement, the mechanisms and measures identified within this statement will be developed to further investigate our supply chain with a focus on medium to high risk supply.

UWA is committed to identify, assess, mitigate or remediate any real or perceived instances of modern slavery within its operations and supply chain and will continue to improve through the engagement across the University, through the Modern Slavery Working Group.



Our Process of Consultation with Controlled Entities

OUR SUBSIDIARIES

UWA's subsidiaries are:

- **The University Club of Western Australia Pty Ltd** – Principal Activity – Events and Function Centre
- **Perth International Arts Festival Ltd** – Principal Activity – Arts and Culture Events
- **UWA Sport Pty Ltd** – Principal Activity – Sports and Recreational Activities
- **UWA Accommodation Services Pty Ltd** – Principal Activity – Student Accommodation
- **Young Lives Matter Foundation UWA Limited*** – Principal Activity – Youth Suicide Prevention Research

*Limited by guarantee

For the purposes of this Statement, subsidiaries were asked to provide details of current policies, processes and activities in place to address the risk of modern slavery. All subsidiaries will engage further with the Working Group and UWA Procurement to identify and mitigate supply chain risks going forward.



The University Club of Western Australia Pty Ltd (University Club)

Supply Chain

The University Club has identified the international farming of coffee beans as being at risk of potential modern slavery activities. The University Club supplier is however certified as Fair Trade and has given a commitment that products are sourced and manufactured ethically. Where possible the University Club aims to source locally within Western Australia or within wider Australia minimising the risk of unethical agricultural practices. The University Club also remains aligned with industry award and National Employment Standards conditions to ensure fair treatment of all staff, including non-resident visa holders.

With regard to sourcing processes, the University Club is committed to using the UWA sourcing and contract templates and participating in future supplier Self-Assessment Questionnaires and contributing to the three-year plan.

Employees

The University Club is committed to promoting equal treatment of all employees and conducts all recruitment and selection processes in a fair and confidential manner while aligning to the *Fair Work Act (Cth)* and the requirements of the vacant position.

Perth International Arts Festival Ltd (Perth Festival)

Perth Festival's risk assessment of current activity is deemed to be minimal in relation to modern slavery. The Perth Festival acknowledges that in the arts there is risk of non-payment to performers and other artists, however it is vigilant in ensuring that these practices do not happen. The Perth Festival places high value on its people and has a dedicated Head of People and Culture to ensure fairness in all aspects of their activities. This is the only role of its kind at any festival in Australia. Perth Festival diligently focuses on ensuring that all their employees are paid correctly and at the appropriate rates by undertaking regular contract reviews, confirming salary advice with Live Performance Australia and having a system of checks and balances across its operations.

UWA Sport Pty Ltd (UWA Sport)

Employees of UWA Sport are covered under the appropriate safeguards and agreements applied by UWA.

UWA Sport also has functions dedicated to People, Culture and Inclusion to oversee the safety and wellbeing of its staff. While UWA Sport's supply chain includes some high risk categories such as sporting goods and uniform suppliers, it endeavours to source locally where possible to reduce exposure to modern slavery risks in overseas countries where employment safeguards may not be as stringent. Additionally, UWA procurement processes and systems are used for large acquisitions and projects.



UWA Accommodation Services Pty Ltd

This subsidiary does not have any employees and is not an operating entity. This entity processes incentives under the National Rental Affordability Scheme Incentive, that the University receives from the government as part of an accommodation affordability scheme. Operation and management of the property and tenancy management services are performed by the University.

Young Lives Matter Foundation UWA Ltd (Young Lives Matter Foundation)

Young Lives Matter Foundation does not engage employees directly but is an establishment of a board of UWA researchers and industry professionals committed to raise awareness and prevention of youth suicide.

Other Information

OUR SUSTAINABILITY COMMITMENT

In the broader areas of sustainability embodied by the United Nations Sustainable Development Goals, the University continued to demonstrate leadership and commitment in 2021:

- UWA Business School submitted its fourth UN Principles for Responsible Management Education (PRME) Sharing Information Progress Report. As a signatory to the UN PRME, the University is committed to progressing the implementation of the PRME principles in the development of current and future managers.
- The University committed to emission targets of carbon neutrality for scope 1 and 2 greenhouse gas emissions by 2025 plus a commitment to achieve net zero emissions for scope 1, 2 and 3 sources by no later than 2040.

- The University committed to developing a Sustainability Strategy by 2023 which will outline our path towards addressing the UN Sustainable Development Goals.
- The University continued to progress the efforts of the Sustainability Committee, the Climate Change Community of Practice, the Grand Challenges initiative and the Environmental Sustainability Strategy.

Looking Ahead

AUPN 2022 Priorities and Deliverables

AUPN Modern Slavery Program 2022 Priorities and Deliverables

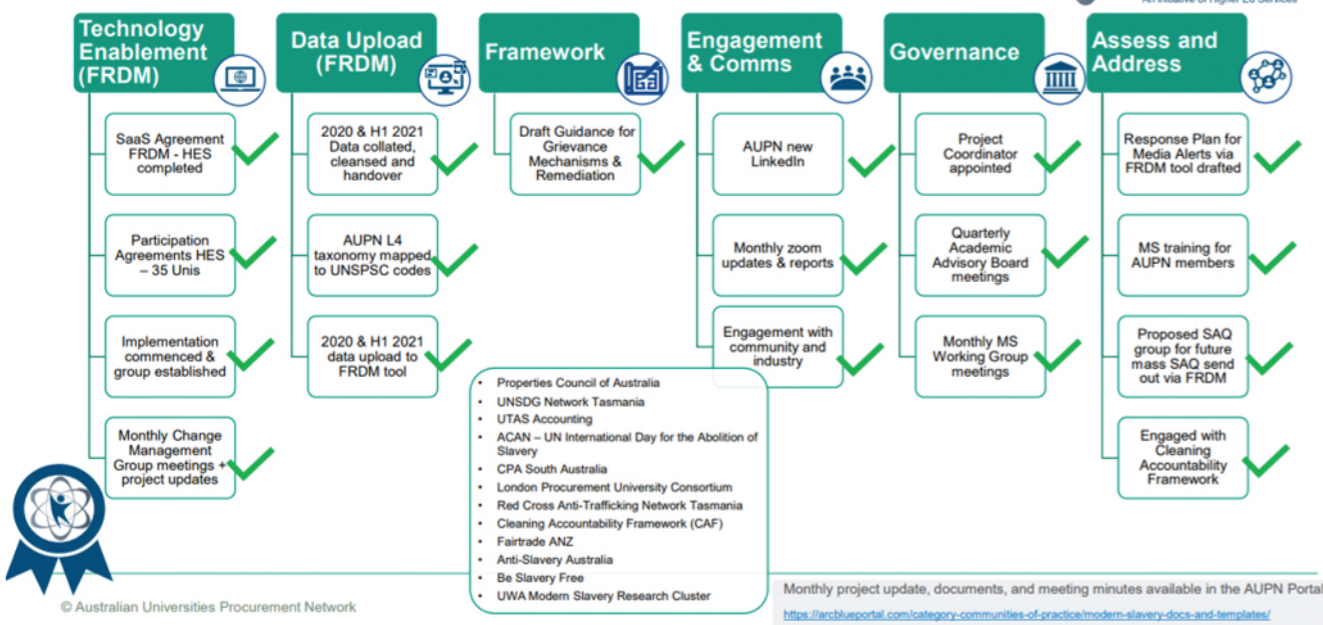


Embed FRDM	<ul style="list-style-type: none"> • Monthly University MS Forum meetings • Response to high-risk media alerts and issues • FRDM process guidelines • Clear strategy on SAQ roll out
Data Improvement	<ul style="list-style-type: none"> • Data workshop with FRDM & Arc Blue to provide individualised summary feedback on data, recommendations for improvement at source • 1-2 check-ins during the year
Supplier Engagement	<ul style="list-style-type: none"> • Leverage FRDM to re-engage with suppliers • Execute SAQ wave 1 roll-out • Review findings & insights
Statement Maturity	<ul style="list-style-type: none"> • University statement review for trends and recommendations in H2 • MS Training & Capacity Building for staff

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AUPN Modern Slavery Program – 2021 Achievements

2021 AUPN MSWG Key Achievements



UWA 2022 Priorities and Deliverables

UWA is developing a three-year plan in the areas of governance, our students, our employees, our subsidiaries, our investments and our supply chain to achieve our desired outcomes of transparency, oversight and development of our reporting capabilities.

The initial focus of the three-year plan will be in training and induction of our stakeholders and process improvements to UWA procurement documentation. Training in some areas has already begun.



THE UNIVERSITY OF
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