

# Modern Slavery Statement 2025



THE UNIVERSITY OF  
SYDNEY



# Support Services

This statement contains information about modern slavery that some people may find distressing. If you need to talk to someone, or if you or someone you know is unsafe, please know that help is available.

If you are in immediate danger, or feel concerned for someone else's safety, call Emergency Services (000).

If you feel unsafe on campus, contact Protective Services on 9351 3333 (24 hours, 7 days a week).

24-hour free phone counselling is available from the following community resources:

- **Lifeline** 13 11 14
- **Mental Health Line NSW** 1800 011 511

Call Translating and Interpreting Service on 131 450 for free and confidential interpreter services to help speak with service providers in your own language.

## To report modern slavery:

- Raise a concern, anonymously if you wish, via the **University's Modern Slavery Incident Reporting Form**.
- For reports unrelated to the University, or if you do not feel comfortable reporting to the University:
  - **The Australian Federal Police** can keep you safe, provide advice and refer you to other services that provide accommodation, financial support, counselling, legal and immigration advice.  
Call: 131 444, 24 hours, 7 days a week.
  - **The Office of the NSW Anti-slavery Commissioner** provides confidential support and assistance.  
Call: 1800 FREEDOM (1800 373 3366)  
Email: [antislavery@dcj.nsw.gov.au](mailto:antislavery@dcj.nsw.gov.au)

## To access support:

The University provides confidential advice and assistance for staff, students, and affiliates.

- Contact the Modern Slavery Unit for information on University support and other specialist services:  
[anti.slavery@sydney.edu.au](mailto:anti.slavery@sydney.edu.au)

If you are a **student** at the University of Sydney:

- Contact the **Safer Communities Office**  
Email: [safer-communities.officer@sydney.edu.au](mailto:safer-communities.officer@sydney.edu.au)  
Call: +61 2 8627 6808 or  
1800 SYD HLP (1800 793 457)  
from 9am to 5pm, Monday to Friday

If you are a **staff member** at the University of Sydney:

- Contact the **Employee Assistance Program (EAP) for confidential, independent counselling**:  
Call: 1300 687 327, 24 hours, 7 days a week  
Book online or Live Chat with a counsellor by visiting [www.convergeinternational.com.au](http://www.convergeinternational.com.au)

# Acknowledgement of Country

The University of Sydney's Camperdown campus is on the lands of the Gadigal, with campuses, teaching and research facilities on the lands of the Gamaraygal, Dharug, Wangal, Darkinyung, Burramadagal, Dharawal, Gandangara, Gamilaraay, Barkindji, Bundjalung, Wiradjuri, Ngunawal, Gureng Gureng and Gagadju peoples.

We recognise and pay respect to the Elders and communities of these lands, past and present, who for thousands of years have shared and exchanged knowledges across innumerable generations, for the benefit of all.

We recognise and acknowledge Australia's First Peoples and their survival of policies and practices that today we call modern slavery, including forced labour, removals, segregation, servitude, sexual servitude, child labour and forced marriage. These wrongs remain unresolved and remain, shamefully, part of the Unfinished Business of the Land.

As the first Australian university, we acknowledge the history and legacies of racism and ongoing injustices experienced by Aboriginal and Torres Strait Islander peoples of Australia, and the University's part in that history. We also recognise the University may have received funds from donors whose wealth was built on the exploitation of unfree labour or other forms of exploitation.

The University has established a working party of leading scholars, including key Indigenous scholars, to oversee a 'truth-telling' project, to facilitate a deeper understanding of the University's past and its accountability in relation to benefitting from and perpetuating forms of Indigenous dispossession, unfree labour, racist ideologies and the practices arising from these forms of discrimination. The working party aims to deepen the understanding of and appreciation for the importance of the highest standards of ethical research and teaching practice.





# Modern Slavery Statement

## *Contents*

### About this statement

The University of Sydney (ABN 15 211 513 464) is a statutory corporation established in New South Wales pursuant to the University of Sydney Act 1989 (NSW). Our principal address is the University of Sydney, NSW, 2006. We are registered with the Australian Charities and Not-for-profits Commission. Our CRICOS (Commonwealth Register of Institutions and Courses for Overseas Students) number is 00026A.

This is the University of Sydney's Modern Slavery Statement 2025, pursuant to its obligations under section 13 of Australia's Modern Slavery Act 2018 (Cth). This statement is made on behalf of the University of Sydney and its controlled entities for the calendar year ended 31 December 2025.

The statement has been approved by the Senate of the University at its meeting on 8 May 2026.

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# From the Chancellor and Vice-Chancellor

As we mark six years since the University of Sydney’s first Modern Slavery Statement, we remain deeply committed to respecting human rights and taking meaningful action to address modern slavery. Our approach is informed by internationally recognised standards, such as the UN Guiding Principles on Business and Human Rights (UNGPs). Through world-class education, research, strategic partnerships, and rigorous human rights due diligence, we aim to lead by example in global efforts to eradicate modern slavery.

Safeguarding our students remains a core priority. Over 19,000 students have completed our Anti-Slavery Awareness training since its launch in 2019, and in 2025 we engaged more than 1,000 students through tailored programs, events, and campaigns. We also launched the Student Anti-Slavery Ambassador program, empowering students as peer educators, and rolled out a University-wide work rights campaign.

As a large and complex organisation with over \$1 billion in procurement spend on products and services, we recognise the influence of our purchasing practices. We are working towards updating and embedding our modern slavery due diligence, in line with the NSW Anti-slavery Commissioner’s good practice guidance, across our procurement.

In 2025, we developed a new risk screening tool and due diligence toolkit, commencing implementation with university infrastructure projects. We are committed to prioritising actions based on the most severe risks to people, taking a shared responsibility approach with our suppliers. This year we conducted tailored modern slavery due diligence on over 20 procurement projects, including solar panels, electric vehicles, and lab and teaching consumables.

Building our staff capacity remains central to our approach. Since 2019, more than 27,700 staff have completed mandatory anti-slavery training, with more than 150 staff receiving bespoke training in 2025. These efforts ensure our community is equipped to identify and respond to modern slavery risks.

As Chair of the Australasian Universities Procurement Network’s Modern Slavery Program, the University continued to collaborate with the sector to address risks and shared challenges. We are committed to uplifting transparency and identification of lessons learnt. We shared our approach to addressing modern slavery risks in solar panels in several multi-stakeholder forums and have published our due diligence toolkit and impact measurement framework.

Modern slavery is a profound violation of human dignity. As a global institution, we recognise our responsibility to act decisively and collaboratively. Together—with our staff, students, partners, and the wider community—we reaffirm our commitment to creating a future where human rights are respected and exploitation has no place.



Mr David Thodey AO, FTSE  
Chancellor

A handwritten signature in black ink that reads "David Thodey". The signature is written in a cursive, slightly stylized font.



Professor Mark Scott AO  
Vice-Chancellor and  
President

A handwritten signature in black ink that reads "Mark Scott". The signature is written in a cursive, slightly stylized font.

“Modern slavery is a profound violation of human dignity. As a global institution, we recognise our responsibility to act decisively and collaboratively”



# Who We Are

We are Australia's first University, founded in 1850, and a world-renowned teaching and research institution. We educate students from Australia and around the world at teaching and research facilities primarily across New South Wales.

Our research combines the expertise and talents of scholars from many disciplines – and we are dedicated to delivering a transformational student experience.

Our largest campus is located at Camperdown/Darlington in Sydney, encompassing 72 hectares of teaching and research, facilities, and social infrastructure. We are a statutory corporation pursuant to the *University of Sydney Act 1989* (NSW) and were established by the Parliament of New South Wales in 1850.

\*Data as of 31 March 2025 unless otherwise indicated



## Our People

# 15

**Fellows of the Senate, the University's governing authority, chaired by the Chancellor.**

# 20

**Members of the University Executive\*:**

- Vice-Chancellor
- Senior Deputy Vice-Chancellor and Provost
- Education and Students
- Indigenous Strategy and Services
- Community and Leadership
- Research
- Advancement
- External Engagement
- Operations
- Strategy
- General Counsel
- Additional 9 members, representing faculties and schools and other business units

\*As of 31 December 2025

# 27,920\*

**University staff**

\*Based on unique headcount

**Staff numbers by role**  
(some staff may hold multiple roles)

- 13,205 Casual staff
- 6,075 Professional staff
- 4,195 Academic staff
- 5,965 Affiliates

**Staff demographics**

- 291 staff identify as Aboriginal or Torres Strait Islander
- 400 staff with a disability
- 8,894 staff identify as Non-Anglo Celtic

**74,128 Students**

- 38,317 Domestic students
- 35,811 International students from 138 countries



## Our Spaces and Operations

# 7

**Campuses**

- Camden
- Camperdown (including Mallett Street)
- Dubbo
- Lidcombe (Cumberland)
- Surry Hills
- Sydney
- Westmead

# 1

**Educational Facility**

- Parramatta

**Teaching and Research locations include:**

- One Tree Island Research Station
- Sydney Medical School Campuses and Teaching Hospitals
- Narrabri and Nowley
- Arthursleigh
- Wildlife Health and Conservation Hospital

ALL data as of 27 November 2025

# 6

**Offshore Centres\***

- Centre in China
- Sydney Vietnam Institute
- French School of Asian Studies Cambodia
- Mataika House in Fiji
- Power Institute Studio France
- Australian Archeological Institute Greece

\*As of 31 December 2025

**566 Campus Buildings\***

\*As of 31 December 2025

**14 Residential Colleges or Student Residences\***

\*As of 31 December 2025



## Our Education and Research

5

### Faculties\*

Faculty of Arts and Social Sciences  
 Faculty of Engineering  
 Faculty of Medicine and Health  
 Faculty of Science  
 The University of Sydney Business School

\*As of 25 November 2025

3

### Schools\*

Sydney Conservatorium of Music  
 The University of Sydney Law School  
 The University of Sydney School of  
 Architecture, Design and Planning

\*As of 25 November 2025

836

### Award Courses (excludes cross-institutional)\*

\*As of 24 November 2025

90

### Research and Teaching Centres\*

\*As of 18 November 2025

**\$398,784,433** awarded in research grants and fellowships\*

\*For period 1 January 2024 - 31 December 2024



## Our Community

200+

### Student Clubs and Societies

3

### University student organisations

University of Sydney Union (USU)  
 Students' Representative Council (SRC)  
 Sydney University Postgraduate  
 Representative Association (SUPRA)

250+

### Exchange partners\*

\*As of 1 December 2025

121

exchange partners ranked in the Top 200 universities (Times Higher Education World University Rankings 2026)\*

\*As of 1 December 2025



## Our Controlled Entities

4

### 4 Controlled Entities

#### Operating in Australia

Westmead IVF Pty Ltd (Westmead Fertility Centre) – Australian company providing affordable access to fertility treatments, based at Westmead Hospital in Sydney's West.

#### Operating Overseas

Suzhou Xi Su Commercial Consulting Co., Limited (Centre in China) – Delivering central University strategies in-country.

The University of Sydney Vietnam Institute Company Limited (Sydney Vietnam Institute) – Facilitating research and engagement between Australia and Vietnam.

A14 Holdings Pty Ltd – Holding company for the Centre in China and the Sydney Vietnam Institute, wholly owned and controlled by the University.



## Our Supply Chain\*

**\$1.31 billion**

spend on suppliers

232

product and service types

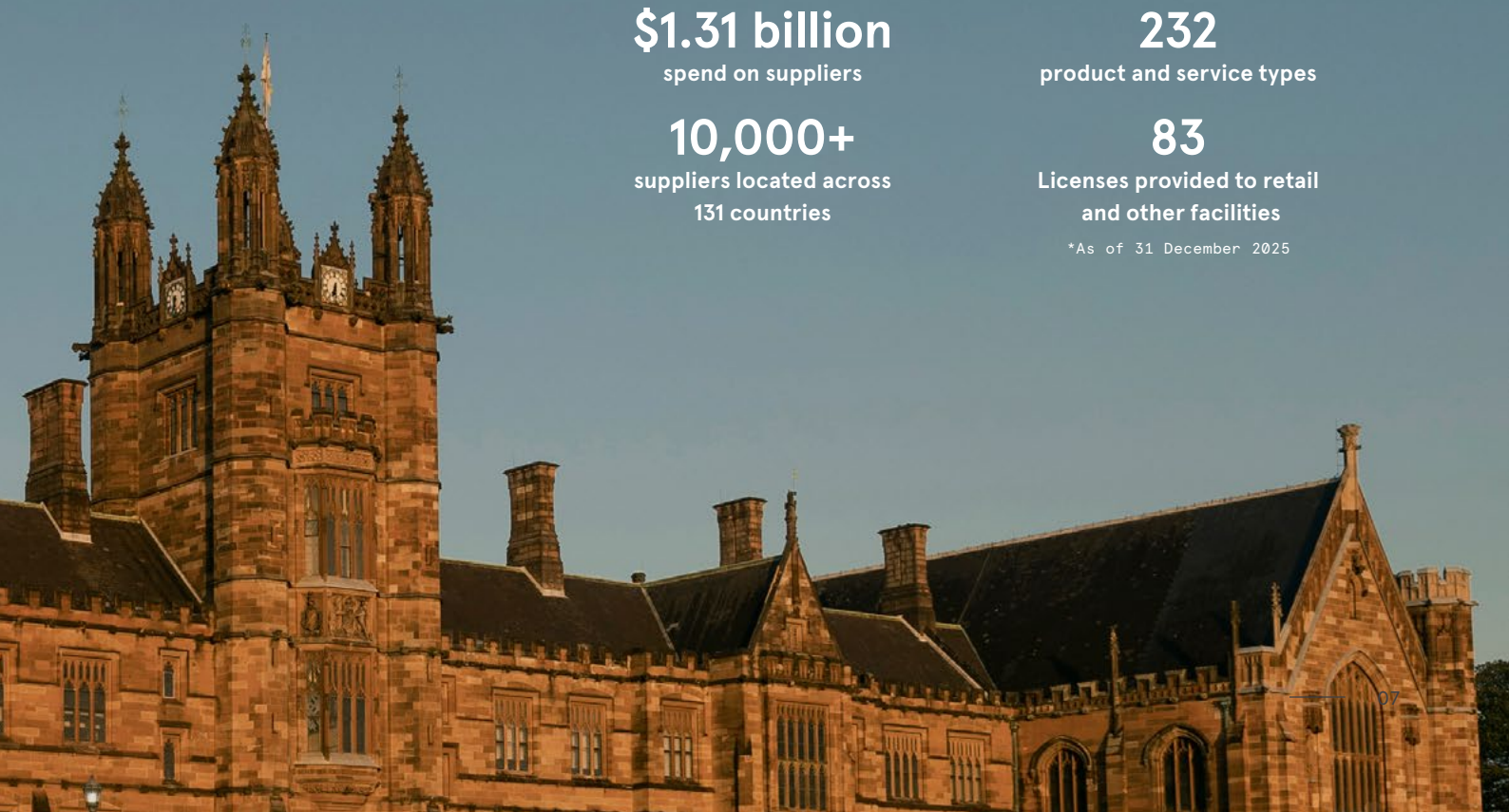
10,000+

suppliers located across 131 countries

83

Licenses provided to retail and other facilities

\*As of 31 December 2025



## Our journey so far

As we mark six years since we began reporting under the Modern Slavery Act, we remain committed to taking a human-centred approach to identifying modern slavery across the University. A key part of our approach is building the confidence and capability across our community including our staff, students, partners and suppliers to recognise modern slavery risk indicators and to report them.

### 2020

#### Laying governance, strategy and policy foundations

- Leadership commitment
- Modern Slavery Policy setting out clear accountabilities and responsibilities
- Modern Slavery Project Team set up to enable organisation-wide approach
- Commitments incorporated into policies and contracts
- Identified and mapped salient modern slavery risks
- Identified and engaged key stakeholders
- Staff and student online training developed

### 2021

#### Understanding our risks and impact

- Due diligence methodology, risk assessment processes and tools (focused on risks to people)
- Modern Slavery Unit established
- Tier 1 supply chain mapping
- Action plans for operational teams and controlled entities developed
- In-depth modern slavery risk assessments for high-risk suppliers and research projects commenced
- Student Human Rights Network established
- Grievance mechanism rolled out

### 2022 & 2023

#### Integrating and embedding due diligence

- Scaling due diligence to include investments
- Development of the bespoke Know Your Partner & Project Tool
- Proof of concept and inaugural OASIS assessment of the University's supply chain
- Affiliated with Electronics Watch
- Over 18,000 staff and close to 16,000 students completed anti-slavery training
- Student engagement and awareness campaigns and training expanded
- Launched the Modern Slavery Academic Network to accelerate human rights research and education excellence
- Shared our tools and frameworks to contribute to best practice

### 2024

#### Innovating and expanding our reach and impact

- Mapping beyond Tier 1 suppliers
- Embedded student risk assessment and response procedure
- Know Your Partner & Project Tool roll out
- 50+ tailored due diligence assessments of high-risk research and procurement projects
- 18 modern slavery risk guides developed for staff
- Revised modern slavery contract clause bank
- Contributed to public discourse, advocacy and government reviews
- 900+ students engaged through training and campaigns

### 2025

#### Reviewing and refreshing our methodology and approach

- Refined and published our Modern Slavery Due Diligence Framework
- Revised Modern Slavery Policy
- Developed a long-term impact measurement framework
- Developed a bespoke Modern Slavery Procurement Risk Tool
- 12,000+ searches on the Know Your Partner & Project Tool
- 30+ tailored due diligence assessments of high-risk research and procurement projects
- 5 info sheets published on high-risk research categories
- Initiated review of grievance mechanism
- Over 27,000 staff and 19,000 students completed anti-slavery training
- 1,000+ students engaged through campaigns and outreach programs

# Our Due Diligence Framework

As part of our commitment to transparency and collaboration, we have published our Due Diligence Framework, including our Theory of Change and Impact Measurement Framework, along with key resources on modern slavery risks in the university sector, on [our website](#).



## How we delivered on our 2025 commitments

Objectives	Activities we committed to deliver in 2025	Status
Embed human rights due diligence	<b>Ongoing uplift of our governance and policy framework.</b> <ul style="list-style-type: none"> <li>– Commenced review of our Modern Slavery Policy.</li> <li>– Finalised our Impact Measurement Framework.</li> <li>– Finalised our Theory of Change.</li> </ul>	Ongoing
	<b>Review our high-risk procurement and research categories.</b> <ul style="list-style-type: none"> <li>– Developed a bespoke Modern Slavery Procurement Risk Tool.</li> <li>– Reviewed our high-risk research categories and developed <a href="#">key resources</a> on risk indicators.</li> </ul>	Completed
	<b>Strengthen modern slavery risk screening and assessment in research activities and partnerships.</b> <ul style="list-style-type: none"> <li>– 7 faculties and schools and 5+ business units use our Know Your Partner &amp; Project Tool to identify modern slavery and related risks in research projects and partnerships.</li> <li>– Updated the Tool to more proactively identify risks and refer for specialist assessments.</li> <li>– 30+ tailored due diligence assessments for high-risk research and procurement projects.</li> </ul>	Ongoing
	<b>Deepen our engagement with suppliers.</b>	Commence in 2026
	<b>Implement a new supplier assessment platform to enhance visibility beyond Tier 1 of our supply chain.</b> <ul style="list-style-type: none"> <li>– Joined Sedex to identify, monitor and address modern slavery risks with our suppliers.</li> <li>– 13 strategic direct and indirect suppliers linked with on Sedex through initial implementation.</li> </ul>	Ongoing
	<b>Review the University's grievance mechanism.</b> <ul style="list-style-type: none"> <li>– Initiated review, including consultation with students, civil society and people with lived experience.</li> </ul>	Ongoing
Equip our staff and students to identify and report modern slavery	<b>Engage students and build awareness of modern slavery risks.</b> <ul style="list-style-type: none"> <li>– 19,000+ students have voluntarily completed our Anti-Slavery Awareness module since it launched in 2019.</li> <li>– Engaged 1,000+ students on modern slavery risks, through trainings, events and our Student Anti-Slavery Ambassador Program.</li> </ul>	Ongoing
	<b>Continue to build the capacity of staff to identify risk indicators.</b> <ul style="list-style-type: none"> <li>– 27,700+ staff and affiliates have completed the Anti-Slavery Awareness module since its launch in 2019.</li> <li>– 80.1% of the 23,951 current staff who were assigned the module have completed it.</li> <li>– 150+ staff, including in procurement and student placements, received bespoke training on modern slavery.</li> </ul>	Ongoing
	<b>Foster engagement with civil society partners and integrate perspectives of people with lived experience.</b> <ul style="list-style-type: none"> <li>– Hosted a roundtable, alongside Monash University, with civil society partners on good practice approaches to modern slavery grievances.</li> <li>– Collaborated with the Australian Red Cross, The Salvation Army, and Redfern Legal Centre on training and resources to address risks to students.</li> <li>– Engaged people with lived experience to review our modern slavery grievance mechanism.</li> </ul>	Ongoing
	<b>Refresh our Anti-Slavery Awareness training module for staff.</b>	Commence in 2026

Objectives	Activities we committed to deliver in 2025	Status
Contribute to multi-stakeholder collaboration to influence change	<p><b>Continue to collaborate with government and other partners.</b></p> <ul style="list-style-type: none"> <li>– Engaged with federal and NSW government departments to share our due diligence framework and identify opportunities for collaboration.</li> <li>– Participated in the NSW Anti-slavery Commissioner’s Health Working Group.</li> <li>– Contributed to government consultations on modern slavery reforms.</li> </ul>	Ongoing
	<p><b>Foster best practice in the university sector.</b></p> <ul style="list-style-type: none"> <li>– Chaired the Australasian Universities Procurement Network’s (AUPN) Modern Slavery Program.</li> <li>– Led collaborative supplier assessments and engagements with AUPN members, including in medical and laboratory consumables, ICT, business services and housekeeping products.</li> <li>– Hosted a roundtable with 44 attendees representing 11 Australian universities to develop shared approaches to student risks.</li> </ul>	Ongoing
	<p><b>Build on the University’s research, practice, and thought leadership, through events and other forums.</b></p> <ul style="list-style-type: none"> <li>– Collaborated with Monash University on development of a good practice framework for modern slavery grievance mechanisms.</li> <li>– Joined the UN Global Compact Network Australia’s Modern Slavery Working Group.</li> </ul>	Ongoing
	<p><b>Strengthen and share our impact management framework and theory of change.</b></p> <ul style="list-style-type: none"> <li>– Refined and published our <u>Due Diligence Framework</u>, including how we assess the effectiveness of our actions.</li> </ul>	Completed
Enable our academics to inform evidence-based practice on human rights	<p><b>Grow and enhance the University of Sydney’s Modern Slavery Academic Network.</b></p> <ul style="list-style-type: none"> <li>– 6 new members joined the Modern Slavery Academic Network, taking the total to 29 across 6 disciplines.</li> <li>– Hosted our first network event.</li> </ul>	Ongoing
	<p><b>Facilitate opportunities to leverage the University’s expertise and deepen connections between academics, government, business and industry, civil society and people with lived experience.</b></p> <ul style="list-style-type: none"> <li>– Established collaboration opportunities between the University and the Australian Anti-Slavery Commissioner.</li> </ul>	Ongoing



# Identifying, Assessing and Addressing Our Modern Slavery Risks

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## Our Potential Risks to People

We undertake an annual assessment to identify our salient modern slavery risks to people, drawing on diverse sources, including human rights experts, government sanctions, legal action and engagement with affected stakeholders.

To prioritise our actions, we assess whether the University may cause, contribute to, or be directly linked to the modern slavery risk. More information on our risk assessment methodology can be found in our [Due Diligence Framework](#).

Potential involvement	Cause	Contribute	Directly Linked
<b>Definition</b>	<i>An entity's operations may directly result in modern slavery.</i>	<i>An entity's operations or actions in its value chain may contribute to modern slavery, including acts or omissions that may incentivise modern slavery.</i>	<i>An entity's operations, products or services may be connected to modern slavery through the activities of another entity it has a business relationship with.</i>
<b>These examples are intended for illustrative purposes and do not represent any specific incidents of modern slavery across the University.</b>			
<b>As an employer</b>	<b>Impact on our people</b> <i>Cause</i> e.g. <i>Cause</i> modern slavery through a research assistant experiencing threats and withholding of their passport by their supervisor.		
<b>As a buyer of goods and services</b>	<b>Impact on people in our supply chain</b> <i>Contribute to / Directly Linked</i> e.g. <i>Directly linked</i> to modern slavery through a supplier for cleaning services on campus who engages in forced labour of its workers.		
<b>As a research institute</b>	<b>Impact of our research projects and partnerships</b> <i>Cause / Contribute to / Directly Linked</i> e.g. <i>Contribute to</i> modern slavery through sourcing human tissue for a research project through a third party that engages in trafficking of human biomaterials.		
<b>As a higher education institute</b>	<b>Impact on our students</b> <i>Contribute to / Directly Linked</i> e.g. <i>Contribute to</i> modern slavery through inadequate due diligence of a placement partner where the student experiences exploitative conditions.		
<b>As a provider of services</b>	<b>Impact of our offshore centres and controlled entities</b> <i>Cause / Contribute to / Directly Linked</i> e.g. <i>Directly linked</i> to modern slavery through a patient at our Westmead Fertility Centre, who is being coerced into treatment and donation of gametes by a family member.		
<b>As an investor, collaborator and partner</b>	<b>Impact of our partnerships, investments and donors</b> <i>Contribute to / Directly Linked</i> e.g. <i>Directly linked</i> to modern slavery through a partner with reports of involvement in human rights abuses.		

# Modern Slavery Risks in Our Value Chain



## Our People

The University of Sydney employs a dynamic workforce of more than 27,000 individuals across a range of roles, including permanent, fixed-term, and casual academic, professional, and affiliate positions. Our people are central to our mission of transforming lives through world-class research and teaching.

Our workforce is highly diverse, with employees from varied backgrounds and over 13,000 casual staff making a meaningful contributing to our operations. **When assessing the risk of modern slavery within our operations, our direct employees are considered low risk.** Staff are engaged under transparent employment conditions that comply with all legislative requirements. Recruitment processes are rigorous, incorporating background checks, and all employment is voluntary. We are committed to fostering a safe, inclusive, and supportive workplace that prioritises staff wellbeing and professional growth.

The University offers a comprehensive suite of initiatives to support staff, including:

- **Flexible work arrangements** to support work-life balance.
- **Mandatory anti-slavery training** for all employees, designed to build awareness and provide guidance on where to seek assistance. In 2025, 3,934 staff completed our Anti-Slavery Awareness training, taking the total to more than 27,700 staff since the module launched in 2019. \*

- **Clear and accessible grievance mechanisms** enabling staff to confidentially report concerns related to modern slavery, workplace exploitation, sexual misconduct and other issues. Reports are investigated in line with our [Due Diligence Framework](#), with a focus on the trauma-informed principles of safety, trustworthiness, choice and empowerment.

The University's dedicated anti-slavery team collaborates closely with Human Resources, Work Health and Safety, Internal Audit, and Risk to ensure that any reports received through grievance channels are thoroughly investigated and, where appropriate, remedy is provided.



# Our Supply Chain

The University’s supply chain is diverse and complex, with over \$1.3 billion spent in 2025 on goods and services from over 10,000 suppliers from 131 countries.

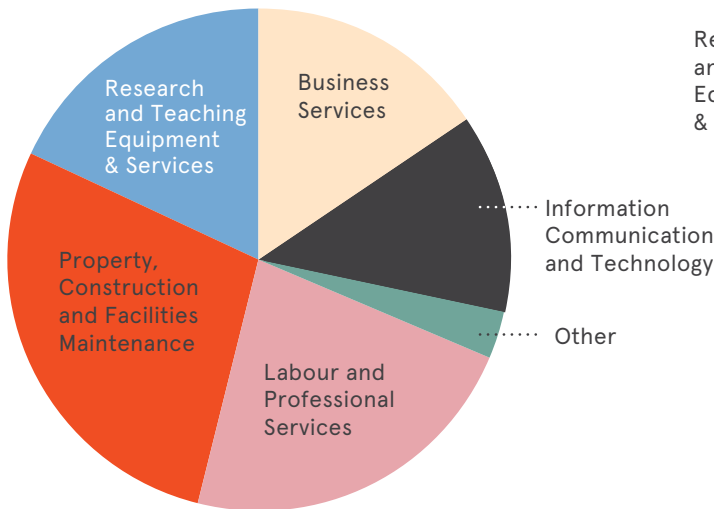
In 2025, we developed a new risk tool to identify the inherent modern slavery risk in the goods and services we procure. The tool draws on several credible sources, including the NSW Anti-slavery Commissioner’s Inherent Risk Identification Tool, developed in collaboration

with the University of Sydney Business School. We are progressively rolling out our Modern Slavery Procurement Risk Tool, prioritising high-risk procurement categories, including construction, campus services and ICT.

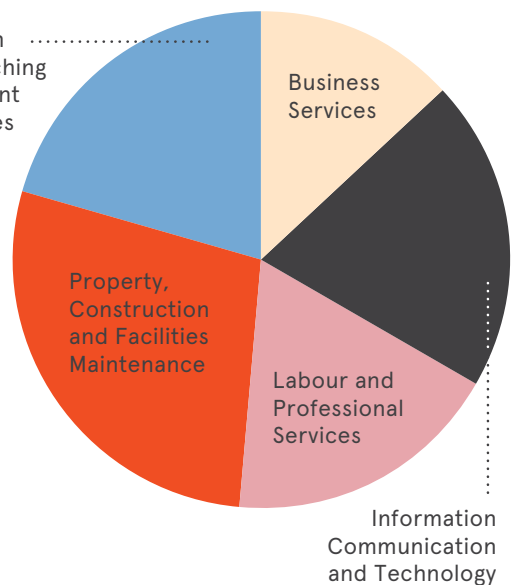
## Breakdown of 2025 procurement spend

*The following data cannot be compared with previous Modern Slavery Statements, as it is based on analysis by our new Modern Slavery Procurement Risk Tool.*

**Total procurement spend**



**High-risk category procurement spend**



**Business Services**

15.67% of total procurement spend  
13.20% of the the high-risk categories

**Information Communication and Technology**

12.88% of total procurement spend  
20.30% of the the high-risk categories

**Labour and Professional Services**

22.52% of total procurement spend  
18.08% of the the high-risk categories

**Property, Construction and Facilities Maintenance**

28.12% of total procurement spend  
27.94% of the the high-risk categories

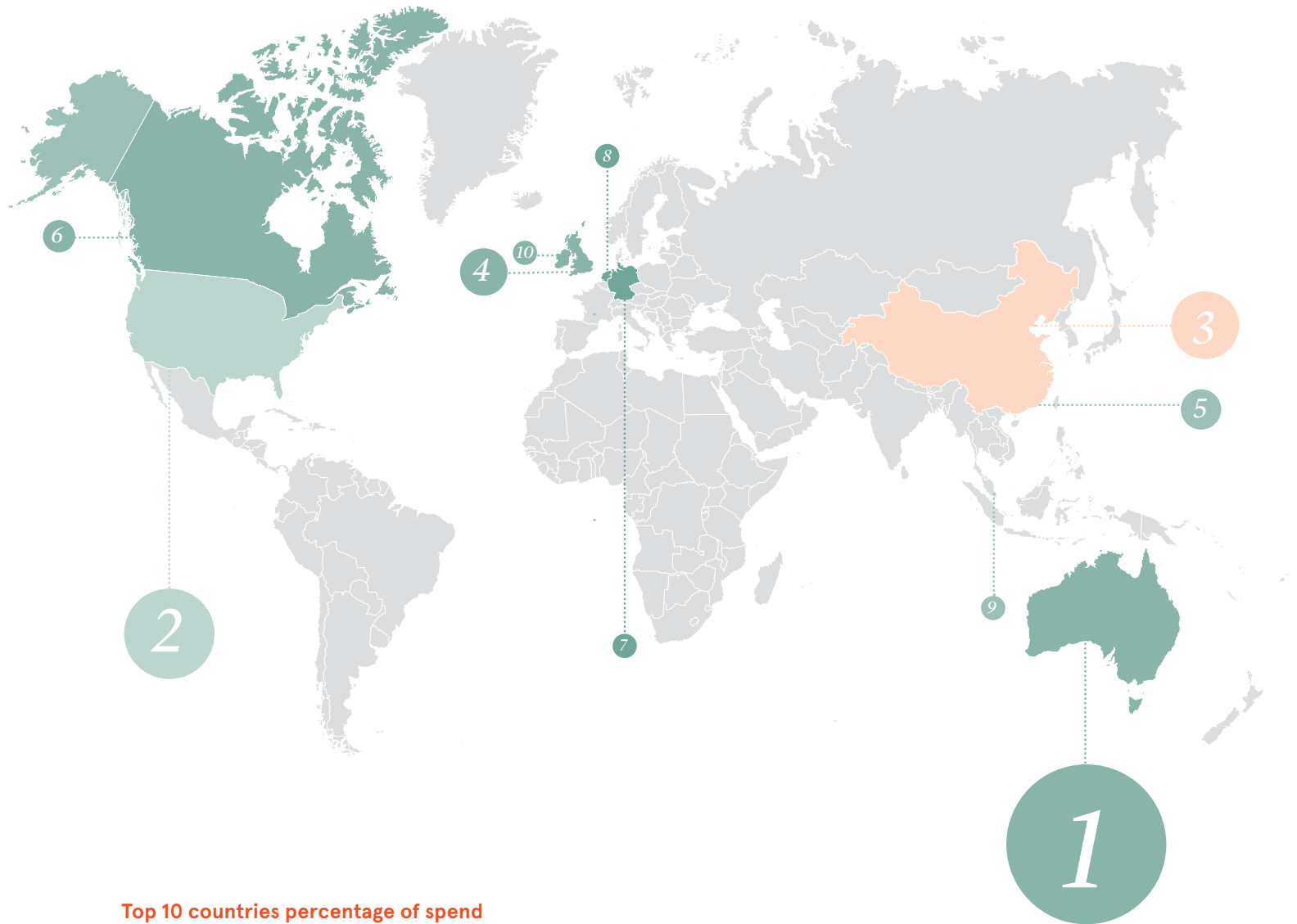
**Research and Teaching Equipment & Services**

17.78% of total procurement spend  
20.48% of the the high-risk categories

**Other**

3.03% of total procurement spend  
N/A of the the high-risk categories

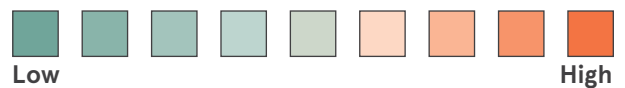
## Modern slavery risk for top 10 countries of procurement spend



### Top 10 countries percentage of spend

Map legend	Country	Percentage
1	Australia	89.11%
2	United States	3.00%
3	China	1.76%
4	United Kingdom	1.21%
5	Hong Kong	0.92%
6	Canada	0.53%
7	Germany	0.46%
8	Netherlands	0.39%
9	Singapore	0.25%
10	Ireland	0.22%

### Estimated Prevalence of Modern Slavery



\*Source: Global Slavery Index, Walk Free, 2023

# Our Supply Chain

Our Objective	We delivered	We will measure
<p><b>Embed human rights due diligence</b></p>	<p><b>Updates to our modern slavery due diligence procurement toolkit, in line with good practice, including development of:</b></p> <ul style="list-style-type: none"> <li>- A bespoke tool to identify modern slavery risks in the products and services we purchase.</li> <li>- Resources to assess suppliers’ maturity in identifying and addressing risks.</li> <li>- Sector-specific guidance for procurement staff.</li> <li>- Updated contract clauses that take a shared responsibility approach to addressing modern slavery with our suppliers.</li> <li>- <a href="#">See Case study – Applying human rights due diligence to identify modern slavery risks in our supply chain.</a></li> </ul> <p><b>Ongoing due diligence of products and services that are high-risk for modern slavery.</b></p> <ul style="list-style-type: none"> <li>- 67 of procurement tenders had modern slavery questions, reflecting all high value, open market tenders released by the University’s procurement team. This excludes purchases under master agreements, small, one off Requests for Tender, or use of existing NSW Government contracts, where our modern slavery questions may not be used.</li> <li>- 326 of new or renewed contracts with suppliers had modern slavery clauses.</li> <li>- 22 tailored assessments of high-risk procurement activities, including for guarding and concierge services, student accommodation, student recruitment, and facilities management.</li> <li>- Due diligence actions included evaluation of suppliers’ risk management approaches, development of bespoke tender questions and briefing sessions for suppliers.</li> <li>- Specialist risk assessment and due diligence plan for the University’s transition plan to electric vehicles (commencing 2026).</li> <li>- Worker driven monitoring of our ICT supply chain, through our affiliation with <a href="#">Electronics Watch</a> (see <a href="#">Case study – Identifying forced labour in our supply chain through our affiliation with Electronics Watch</a>)</li> </ul>	<p>#/% of procurement projects over \$250k identified as inherent high-risk for modern slavery</p> <p>#/% of inherent high-risk procurement projects where the University reduced the residual risk</p> <p><i>Data collection to commence in 2026</i></p>
<p><b>Equip our staff and students to identify and report modern slavery</b></p>	<p><b>Training, guidance and tools for procurement staff to identify and address modern slavery risks.</b></p> <ul style="list-style-type: none"> <li>- Workshop on modern slavery risks in solar procurement for staff in construction, campus facilities, legal and sustainability.</li> <li>- 6 staff in ICT procurement trained on sector-specific modern slavery risks and our due diligence process.</li> <li>- 3 staff in construction and facilities management procurement trained on how to use and evaluate modern slavery tender questions.</li> <li>- Access to labour rights resources through our membership with the Cleaning Accountability Framework.</li> </ul>	<p>#/% of staff in high-risk roles that demonstrate increased awareness of how to identify and report modern slavery risks</p> <p><i>Data collection to commence in 2026</i></p>
<p><b>Contribute to multi-stakeholder collaboration to influence change</b></p>	<p><b>Participated in the Australasian Universities Procurement Network (AUPN)</b></p> <ul style="list-style-type: none"> <li>- Chaired the AUPN Modern Slavery Program.</li> <li>- Contributed to spend data analytics to support sector-wide risk assessments.</li> <li>- Led joint procurement activities to enhance sector-wide impact on modern slavery risks, including in medical and laboratory consumables, ICT, business services and housekeeping products.</li> <li>- Engaged directly with suppliers to the higher education sector to support capability uplift in modern slavery due diligence.</li> </ul> <p><b>Continued to deepen our engagement with suppliers as part of our shared responsibility approach to addressing modern slavery.</b></p> <ul style="list-style-type: none"> <li>- Facilitated regular industry briefings to raise awareness of the University’s expectations regarding modern slavery risks.</li> <li>- Worked closely with key suppliers, including in construction, ICT and medical PPE, to review and strengthen their due diligence processes, including assessment of labour practices, reporting mechanisms and remediation.</li> <li>- Conducted targeted supplier surveys and follow-up engagements to monitor ongoing compliance and support continuous improvement.</li> </ul>	<p>Case studies on supplier engagement on modern slavery risks</p> <p><i>Data collection to commence in 2026</i></p>

# Implementing Sedex for Supplier Due Diligence

The University has joined Sedex to identify, monitor and address modern slavery risks in our supply chain. Sedex membership enables us to leverage their self-assessment questionnaire for suppliers, industry risk assessment capabilities and SMETA audit function to ensure that suppliers meet our ethical standards.

## Initial implementation of SEDEX

We developed an implementation plan to embed Sedex across our procurement practices, with several initial actions in 2025:

- Linked with 13 strategic suppliers (both directly and indirectly supplying the University)
- Focused on engaging suppliers in high-risk categories, including ICT, laboratory supplies, construction and facilities management, solar panels and business services.
- Utilised data from SMETA audits to gain insights on products in high-risk categories, offering us a detailed view into the labour practices of our suppliers.

In 2026, we plan to implement Sedex more widely to assess our supply chain risks and conduct due diligence in supply chain.



## Case Study

### *Applying human rights due diligence to identify modern slavery risks in our supply chain*

In 2025, we strengthened our procurement processes to align with the NSW Anti-slavery Commissioner’s Guidance on Reasonable Steps and the UN Guiding Principles on Business and Human Rights. The few modern slavery cases identified in our supply chain to date indicated there were opportunities to strengthen our approach, given the breadth and complexity of the University’s purchasing.

Following a review of good practice, lessons learned, and consultation with procurement teams, we developed a **Due Diligence Toolkit** designed to:

- **Prioritise risks to people**, focusing on sector-specific risks and deep impact rather than ‘tick box’ compliance.
- **Integrate into existing systems**, ensuring staff can apply it effectively and consistently.
- **Focus on where we have the greatest influence to affect change**, considering scale of our procurement, existing risk management requirements, and supplier capacity.

We are adopting a **staged approach** over 2025 and 2026, piloting the toolkit with procurement staff, who will use it to identify and address modern slavery risks in the sourcing of goods and services in construction, cleaning and facilities management and ICT hardware.

#### **Focus Area: University Infrastructure Projects**

In 2025, we embedded the Due Diligence Toolkit into the procurement process for sourcing construction services and products for University infrastructure projects. Construction carries heightened modern slavery risks due to complex supply chains, reliance on low-skilled migrant labour, and subcontracting practices that can obscure exploitation. The University invested \$370 million in property, construction and facilities maintenance, representing approximately 30% of total procurement spend.



Photo: Etienne Girarde

## Modern Slavery Due Diligence for University Infrastructure Projects



Identify the inherent modern slavery risk for the procurement activity, using a new risk screening tool, which integrates the NSW Anti-slavery Commissioner's Inherent Risk Identification Tool

Standard Risk

High Risk



Screen suppliers using the **Know Your Partner & Project Tool**

Screen suppliers using the **Know Your Partner & Project Tool**

- The KYPPT is an in-house screening tool, identifying sanctions, human rights and business misconduct concerns.
- Red flags are referred to the University's anti-slavery team to assess and recommend due diligence actions.

Include **modern slavery criteria** in the supplier evaluation

Issue suppliers with **standard risk questions** and evaluate responses

For appointment of suppliers to a panel, issue suppliers with full set of **high-risk questions** and evaluate responses

For supplier selection, issue suppliers with a tailored set of questions to **identify project-specific risks**

- Supplier questions updated to reflect sector and product-specific risks, including construction, services, ICT and solar panels.
- Guidance to assess maturity of suppliers' due diligence.
- In 2026 we will pilot these questions across University infrastructure projects and provide training to staff on assessing responses.



Include the standard risk **modern slavery clauses** in the contract

Include the high-risk **modern slavery clauses** in the contract

- Contract clauses updated to take a shared responsibility approach between the University and our suppliers to address modern slavery.
- Developed custom clauses for high-risk products requiring enhanced due diligence (e.g. solar panels).



Engage with the supplier, with the support of Ethical and Sustainable Procurement, to **address residual modern slavery risks through contract management**

- Pilot approach in 2026 focusing on high-risk, high priority contracts, to evaluate effectiveness in addressing risks to people.
- Due diligence may include supplier engagement, modern slavery KPIs in contract management, engagement with workers or requirements for supply chain mapping.



## Case Study

### *Identifying forced labour in our supply chain through our affiliation with Electronics Watch*

In 2025, 23 factories\* in the University’s electronics supply chain were monitored for forced labour, along with labour rights violations, including hazardous handling of chemicals, discrimination in hiring and violence and harassment.

Electronics Watch, an industry-independent organisation representing more than 1,500 public buyers, undertakes worker-driven monitoring through its civil society and trade union partners. Electronics Watch’s monitoring focuses on worker testimonies from interviews and focus groups, complemented with a review of documentation, including payslips, company policies, media and accounts from those who witnessed violations.

In 2025, **Electronics Watch identified forced labour in 26% (6) of monitored factories in our supply chain. They have initiated remediation in the majority of factories (5),** with one case suspended, as remedy was not obtained for workers and new monitoring began at the site in 2025.

#### 2025 Electronics Watch monitoring of our electronics supply chain\*

Location	Factory	Worker	Findings	Outcome
China	Tier 2: components (e.g. batteries)	Remote monitoring	Forced labour; other labour rights violations	Remediation in progress
China	Tier 2: components	Remote monitoring, including of online posts by workers	Risk of forced labour; other labour rights violations	Remediation in progress
China	Tier 2: components (e.g. plastics)	Remote monitoring, including of online posts by workers	Forced labour	Remediation in progress
China	Tier 2: component supplier	Remote monitoring, including of online posts by workers	Risk of forced labour; other labour rights violations	Remediation in progress
China	Tier 2: components (e.g. casings for notebooks)	Remote monitoring, including of online posts by workers	Risk of forced labour; other labour rights violations	Remediation in progress
China	Tier 2: components	Remote monitoring, including of online posts by workers	Forced labour; other labour rights violations	Remediation in progress
China	Tier 1 and 2: brand-owned final assembly and components	Worker interviews	Risk of forced labour; risk of other labour rights violations	Remediation in progress

\* Data from Q1 – Q3, 2025

Location	Factory	Worker	Findings	Outcome
China	Tier 1 and 2: final assembly and components	Worker interviews	Risk of forced labour; other labour rights violations	Remediation in progress
China	Tier 1 and 2: final assembly and components	Remote monitoring, including of employee testimonies	Risk of labour rights violations	Suspended
China	Tier 1: final assembly	Remote monitoring, including of online posts by workers	Risk of forced labour; other labour rights violations	Remediation in progress
China	Tier 1: final assembly	Worker interviews	Forced labour; other labour rights violations	Suspended
China	Tier 2: components (e.g. lithium and nickel hybrid batteries)	Remote monitoring, including of online posts by workers	Risk of labour rights violations	Suspended
China	Tier 2: components (e.g. batteries)	Remote monitoring, including of comments by workers	Risk of labour rights violations	Suspended
China	Tier 2: components (e.g. LCD screens)	Remote monitoring, including of online posts by workers	Risk of labour rights violations	Suspended
China	Tier 2: components (e.g. printed circuit boards)	Remote worker interviews	Risk of forced labour; other labour rights violations	Remediation in progress
DRC	Mineral extraction: cobalt and copper	Worker interviews	Labour rights violations	Remediation in progress
Hungary	Tier 1: brand-owned final assembly and testing	Worker interviews	Risk of forced labour; other labour rights violations	Remediation in progress
India	Tier 1 and 2: final assembly and components	Worker interviews	Labour rights violations	Remediation in progress
India	Tier 1: testing and assembly unit	Worker interviews	Labour rights violations	Remediation in progress
Malaysia	Tier 2: components (e.g. semiconductors)	Union investigation	Labour rights violations	Remediation in progress
Malaysia	Tier 2: components (e.g. printed circuit boards)	Worker interviews	Forced labour; other labour rights violations	Remediation in progress
Malaysia	Tier 2: components (e.g. semiconductors)	Worker training	Labour rights violations	Remediation in progress
Taiwan	Tier 2: components and semiconductor assembly and test services	Worker interviews	Forced labour; other labour rights violations	Remediation in progress

In addition, in 2025 Electronics Watch identified links between our ICT hardware procurement and two factories in China with reported state-sponsored forced labour. As we are sourcing through third-party distributors and have limited capacity for due diligence in these factories, we are exploring ways to influence change. We are participating in an Electronics Watch working group with other universities and public agencies internationally to use

our shared leverage to influence the major buyer linked to these factories. We have also joined the AUPN Electronics Watch pilot to pool our ICT spend and jointly engage with suppliers.

## Case Study

### *Collaborating with other universities to address modern slavery risks associated with disposable glove manufacturing*

In 2025, a complaint was made at the Australian National Contact Point for Responsible Business Conduct against a major manufacturer of personal protective equipment (PPE) regarding alleged inadequate due diligence and forced labour of workers in its supply chain. The University sources disposable gloves made by this supplier to support our research, operational and clinical activities.

Modern slavery risks, including forced labour and debt bondage, have been well documented in the manufacturing of disposable gloves, given the sector's reliance on migrant workers, high production turnover and limited oversight of working conditions. Several major global suppliers of disposable gloves have previously been banned from importing into the U.S. over forced labour concerns.

Recognising the systemic risks across the sector and the strength in a collective response, the University is leading a coordinated approach with the AUPN, focusing on the disposable glove sector, rather than just the supplier of concern. This collaborative effort aims to:

- Map the sector's exposure to high-risk suppliers.
- Conduct market and supply chain research to inform supplier risk assessments.
- Develop guidance for procurement teams across the sector.

Under the AUPN, the University established a cross sector working group comprised of representatives



from ten university procurement teams and chaired by the University of Sydney. This group was tasked to share knowledge and information on category specific modern slavery risks and best practice modern slavery due diligence. This information was presented at the AUPN forum in November 2025 to over 30 universities.

In addition, the working group intends to build a comprehensive database on modern slavery due diligence in the medical glove manufacturing sector. To achieve this, 15 universities provided detailed product and

supplier information to the AUPN. With this information, the AUPN engaged directly with major suppliers across the sector to seek clarity on modern slavery due diligence in their supply chain and operations.

The engagement will continue in 2026, focusing on: (i) developing guidance for universities to inform their risk mitigation and decision making in medical glove procurement and (ii) leveraging shared spend to influence suppliers and reduce modern slavery risks.

# Our Research Activities

The University of Sydney’s research expertise spans a broad and varied range of disciplines, with projects as diverse as printing artificial bones, trialling psychiatric drugs, using robotics in agriculture, enhancing renewable energy storage devices and employing AI to enhance health care.

Since launching the Know Your Partner & Project Tool (KYPPT) in 2023, the University has progressively implemented screening of research projects and partners for modern slavery and human rights risks. The KYPPT brings together publicly available, reputable risk sources to identify human rights violations, sanctions, legal action and business misconduct for over 20,000 entities,

individuals and locations. Through established escalation pathways, projects that are flagged for modern slavery or other risk indicators, such as the use of sensitive technologies, are referred to specialist functions, including Legal, Research Risk & Security and the Modern Slavery Unit, for review.

Our Objectives	We Delivered	We will measure
<p><b>Embed human rights due diligence</b></p>	<p><b>Risk screening of research projects and partners using the Know Your Partner &amp; Project Tool.</b></p> <ul style="list-style-type: none"> <li>- 10,044 searches on the KYPPT from 120 staff members.</li> <li>- 7 faculties and schools and 5+ other teams (Pre-Award business development managers, Legal, Global &amp; Research Engagement, Commercialisation) used the tool.</li> </ul> <p><b>Assessed projects flagged for modern slavery and related human rights risks and provided due diligence plans.</b></p> <ul style="list-style-type: none"> <li>- 44 searches (less than 1%) on the KYPPT were flagged for risks and referred for specialist assessment.</li> <li>- 11 projects received dedicated modern slavery assessments, referred by the KYPPT and other sources. These included research in high-risk locations and projects involving children, clinical trials overseas, AI, biotechnologies and solar energy.</li> <li>- Risk mitigants implemented with relevant partners included high-risk modern slavery clauses in partner contracts and request for information on their due diligence processes, along with providing researchers with resources on managing risks.</li> </ul>	<p>#/% of research support teams screening research projects for human rights violations.</p> <p>Case studies on high-risk research projects where the University reduced the residual risk, through implementation of mitigants.</p> <p><i>Data collection to commence in 2026.</i></p>
<p><b>Equip our staff and students to identify and report modern slavery</b></p>	<p><b>Continued rollout and enhancement of the KYPPT.</b></p> <ul style="list-style-type: none"> <li>- Engaged with 5 faculties and schools to raise awareness of the KYPPT.</li> <li>- Initiated rollout of the KYPPT to other teams engaging with external partners, such as External Engagement.</li> </ul>	<p>#/% of researchers and research support staff engaged that demonstrate increased understanding of how to identify and report modern slavery risks in research.</p> <p><i>Data collection to commence in 2026.</i></p>

## Case Study

### *Improving due diligence of human rights risks in research*

In 2025, we continued implementation of our Due Diligence Framework across the research pipeline, focusing on improving early identification and mitigation of adverse human rights impacts.



#### **Expanded the scope of our Know Your Partner & Project Tool**

We added new sources to our KYPPT to identify prospective research partners who are not well prepared to address modern slavery risks. This expanded our screening from reactive assessments of known human rights violations to proactive assessments of partners' capacity for prevention, drawing on sources such as the Corporate Human Rights Benchmark and KnowTheChain.

We also strengthened our process for reviewing new sources of risk information, developing criteria for inclusion in the KYPPT. The criteria included assessing sources for their relevancy and credibility, including whether they are developed by people with expert knowledge or firsthand testimony.

#### **Planned engagement with faculties and schools on modern slavery risks**

We reviewed our high-risk research categories for new human rights concerns and published modern slavery information sheets, including on AI, surveillance, renewable energy and biotechnologies.

Looking ahead to 2026, we will collaborate with the Office of Child Safety and Research Risk and Security to integrate due diligence for modern slavery and intersecting risks (e.g. sanctions, sensitive technologies, foreign interference, and child safety) into faculty and school processes, starting with targeted training for the Faculty of Science and the Faculty of Engineering.



## Our Support to Students

Our diverse student community brings together more than 135 nationalities and 32 cultural groups. The University employs specialist staff with experience in providing support for modern slavery, sexual misconduct and domestic and family violence. Through this skilled workforce we offer a range of help for students, including confidential counselling and case management.

In 2025, safeguarding our students remained a core priority. Over 19,000 students have voluntarily completed our Anti-Slavery Awareness training since its launch in 2019, and this year alone we engaged more than 1,000 students through tailored programs, events, and campaigns.

Our Objectives	We Delivered	We will measure
<p><b>Embed human rights due diligence</b></p>	<p><b>Participated in five advisory and working groups on student wellbeing, experience, and safety</b>, sharing evidence-based data to strengthen the University’s safeguarding response.</p> <p><b>Enhanced risk screening of our student placement providers.</b></p> <ul style="list-style-type: none"> <li>- Included our Know Your Partner &amp; Project Tool as one of the pre-placement checks to screen providers for sanctions, human rights violations, legal action and business misconduct.</li> </ul>	<p>#/% of due diligence actions implemented to address salient modern slavery risks.</p> <p>#/% of reports to the University with modern slavery indicators that were addressed.</p> <p><i>Data collection to commence in 2026.</i></p>
<p><b>Equip our staff and students to identify and report modern slavery</b></p>	<p><b>University-wide training for students on modern slavery risks and where to access support.</b></p> <ul style="list-style-type: none"> <li>- 3,483 students voluntarily completed our Anti-Slavery Awareness module in 2025, bringing the total to more than 19,000 students.</li> </ul> <p><b>Bespoke training to student support teams.</b></p> <ul style="list-style-type: none"> <li>- 38 student-facing staff attended scenario-based training by Australian Red Cross, The Salvation Army, and Redfern Legal Centre on safeguarding students from labour exploitation.</li> <li>- 78 staff from the Centre for English Teaching trained on modern slavery risks in pathway courses.</li> </ul> <p><b>Launched our Student Anti-Slavery Ambassador program</b></p> <ul style="list-style-type: none"> <li>- Appointed four Peer Support Advisors (PSA) as Student Ambassadors, providing peer support and advocacy.</li> </ul> <p><b>Actively engaged with over 1,000 students on campus, building their capacity to identify and report modern slavery.</b></p> <ul style="list-style-type: none"> <li>- 650 students engaged through our stall at Welcome Weeks, with 85% of students reporting good knowledge of modern slavery risks post-engagement, compared to 33% before engagement.</li> <li>- 104 students accessed information on their workplace rights information at our International Student Fair stall.</li> <li>- 17 international students attended the Know Your Rights workshop on employment and tenancy rights.</li> <li>- Over 250 students, including Higher Degree by Research students and international students, attended information sessions on modern slavery risks, their rights and where to access support.</li> </ul>	<p>#/% of students and student-facing staff engaged that demonstrate increased awareness of modern slavery and increased confidence in seeking or referring to support.</p> <p><i>Data collection to commence in 2026.</i></p>



“Learning about modern slavery has given me a whole new perspective on many things I take for granted on a daily basis. It may be behind the clothes we buy, the electronics we use, and even some unpaid internships that “seem normal.” As a business school student, I began to realise that business decisions are not just about profit, but also about human rights and social responsibility. In the future, I hope I can be more conscious to understand the impact behind the supply chain and the employment system and make more responsible choices. This is not only a moral issue, but also an issue that our generation must confront.”

A student on the impact of our bespoke online Anti-Slavery Awareness training module



Top: Staff and Anti-Slavery Ambassadors with the Australian Federal Police Human Exploitation and Community Officer NSW doing outreach to new and current students. Photo: The University of Sydney

Bottom: Rollin and DoLores, our Anti-Slavery Ambassadors educating peers during the University Welcome Program. Photo: The University of Sydney

## Case Study

### *Universities unite for collective impact: Addressing modern slavery risks among students as a sector*

The University of Sydney's Modern Slavery Unit, in partnership with the AUPN, hosted a roundtable with 44 participants, including academic and government leaders, people with lived experience, students, civil society and practitioners from 11 universities, to address the risks of modern slavery faced by international students in Australia.

Dr James Cockayne, NSW Anti-slavery Commissioner, opened the discussion by underscoring the critical role universities play in prevention and response. The roundtable heard a powerful testimony from a former student with lived experience, reminding participants that universities can be safe spaces—but only when trust, choice, and practical support are prioritised. The roundtable also included representatives from the Australian Federal Police, Australian Red Cross, the Migrant Justice Institute and Educating for Change who shared insights and resources on engaging with students in culturally sensitive and trauma-informed ways.

The roundtable discussions explored how universities can better identify and mitigate risks, from employment and housing vulnerabilities to early intervention through pre-departure education. Participants stressed the need for

clear, accessible language that resonates with students. Ideas included student-led digital resources, training and tools for student facing teams, and targeted awareness campaigns.

This event marked a significant step forward in the sector's collective response to modern slavery. As one participant noted, "These forums inspire action and strengthen networks across universities." A follow up roundtable has been planned for 2026 to co-design a university sector operational guide on safeguarding students.

NSW Anti-slavery Commissioner Dr James Cockayne, with University of Sydney Vice Provost Professor Susan Rowland, Modern Slavery Unit Director Esty Marcu, Senior Anti-Slavery Manager Clare Bartram, Anti-Slavery Program and Engagement Lead Sylvia Vuong and Ethical and Sustainable Procurement Manager Jonathan Gold. Photo: University of Sydney



# Our Investments

The University applies our Due Diligence Framework to identify and address modern slavery risks in our investment portfolio. Our portfolio is made up of diverse assets, including Australian and international equity, private equity, debt and property.

In 2025, alongside our ongoing human rights screening of our public and private portfolios, we developed an engagement strategy for our fund managers, focused on sector-specific risks and tailored due diligence actions.

Our Objectives	We Delivered	We will measure
<p><b>Embed human rights due diligence</b></p>	<p><b>Screening of our investment portfolio for human rights impacts, including sanctions, lawsuits and allegations.</b></p> <ul style="list-style-type: none"> <li>- 100% of the publicly listed portfolio screened quarterly, with no red flags identified.</li> <li>- 100% of our private equity portfolio screened annually, with no new red flags identified.</li> <li>- In 2023, a private equity company, held in a fund of fund investment and managed by a third-party administrator, was flagged during our screening. Our interest in this company was sold in June 2024.</li> </ul> <p><b>Detailed risk assessments to inform fund manager selection and engagement.</b></p> <ul style="list-style-type: none"> <li>- Assessment of a prospective manager with investments in a company with potential links to the Xinjiang Region in China, including development of engagement questions.</li> <li>- Assessment of portfolio exposure to modern slavery risks in electronics manufacturing (<a href="#">see Case study: Identifying portfolio links to modern slavery risks in electronics manufacturing</a>)</li> </ul>	<p>100% of the University's portfolio screened for human rights violations.</p>
<p><b>Contribute to multi-stakeholder collaboration to influence change</b></p>	<p><b>A review of our fund managers' approach to modern slavery risks, through our annual ESG assessment report.</b></p> <ul style="list-style-type: none"> <li>- 32 managers (84% of relevant assets<sup>1</sup>; 65% total assets) have a policy to manage the risk of modern slavery, compared to 33 managers in 2024.</li> <li>- 43 managers (86% of relevant assets; 71% of total assets) integrate human rights issues into investment decisions.</li> <li>- 28 managers prohibit or otherwise limit investments contributing to modern slavery or human rights abuses (no change from 2024).</li> <li>- 17 managers (32% of relevant assets; 26% of total assets) tracked and reported human rights related engagements with companies, compared to 5 managers in 2024.</li> </ul>	<p>#/% of managers with high-risk holdings engaged on modern slavery risk.</p> <p>#/% of managers with high-risk holdings that demonstrate a maturity in their approach to managing modern slavery risks, following engagement.</p> <p><i>Data collection to commence in 2026.</i></p>

<sup>1</sup> Relevant assets for modern slavery and human rights risks: Private equity, funds of funds, venture capital, listed equities, infrastructure, real estate, private credit, litigation funds and senior loans. Excludes: Asset backed securities, insurance-linked securities, sovereign bonds, cash and managed derivatives.

## Case Study

### *Identifying investment portfolio links to modern slavery risks in electronics manufacturing*

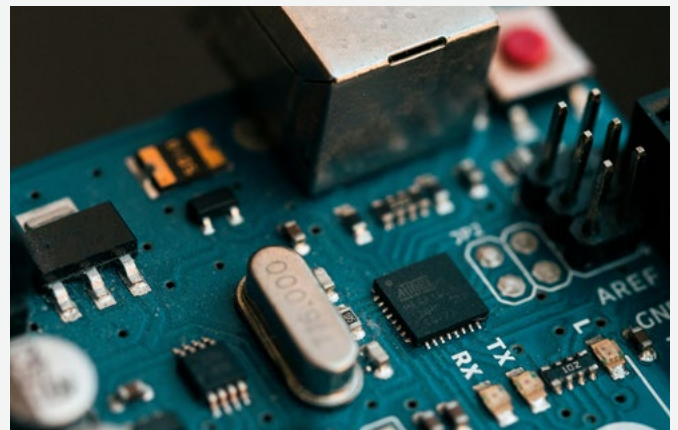
In 2025 and 2026, we are focusing on engagement with fund managers with publicly listed investments in the electronics sector. The sector has well-documented exposure to modern slavery risks, including forced and child labour in raw materials extraction and exploitation of migrant workers in manufacturing.

To prioritise managers for engagement in 2026, we undertook a detailed risk assessment of our portfolio, identifying 26 manufacturers of electronic hardware and semiconductors, held by six managers (as of 31/10/2025).

Our assessment considered:

- Manufacturing in high-risk locations: China, Taiwan, Malaysia and India
- Allegations of forced labour and other adverse human rights impacts in the supply chain
- Modern slavery reporting under Australian and international legislation
- Companies' risk management maturity, drawing on international human rights benchmarks.

We developed an engagement strategy for fund managers to improve transparency of risks in the supply chain and integration of human rights into the investment lifecycle. Progress will be measured against our [Human Rights Maturity Framework](#).



## Human Rights Maturity Framework – electronics sector

Human Rights Due Diligence Steps				
Questions For Fund Managers	Identifying & Monitoring	Assessing & Integrating	Measuring & Evaluating	Engaging With
<p>Do you take steps to identify portfolio exposure to companies and regions with reported human rights violations in the electronics sector, including but not limited to the Xinjiang Uyghur Autonomous Region in China and Taiwan and Malaysia?</p> <p><i>If "yes", please indicate how regularly you undertake these steps, provide details and the outcomes of your finding</i></p>	<p>Aware of human rights risks in the electronics sector but no screening process in place.</p>			<p>Proportional to manager's capacity and resources, engages with portfolio companies, at least annually, to proactively identify exposure to human rights violations and reports publicly on the outcome.</p>
	<p>Monitors media and other sources ad hoc for human rights violations involving companies in the electronics sector.</p>	<p>At least annual screening of companies in the electronics sector for exposure to human rights violations, drawing on a variety of sources.</p>		
<p>What visibility do you have of electronic companies' supply chains? Do you take steps to encourage electronic companies to publish their supplier list?</p>	<p>Aware of human rights risks in the electronics sector but limited visibility of portfolio companies' supply chains.</p>	<p>Requests supply chain information from portfolio companies and uses it to assess companies' risk profiles.</p>		<p>Proportional to manager's capacity and resources, engages with portfolio companies to communicate expectations for transparency and encourage them to publish their supplier list.</p>
	<p>Requests some supply chain information from portfolio companies.</p>			
<p>Are human rights considerations integrated into investment decisions and stewardship activities with portfolio companies in the electronics sector?</p> <p><i>If yes, please provide examples.</i></p>	<p>Aware of human rights risks in the electronics sector but no established process to consider risks in the investment lifecycle.</p>	<p>Integrates human rights into some stages of the investment lifecycle (e.g. negative screening).</p>	<p>Proportional to manager's capacity and resources, integrates human rights across the investment lifecycle, with companies evaluated on their identification, mitigation and remediation of human rights risks.</p>	
		<p>Integrates human rights into investment decisions to prioritise portfolio companies for engagement.</p>		
<p>Have you engaged with any companies in the electronics sector on human rights violations and/or risks in the past year?</p> <p><i>Please provide details and the outcome of the engagement.</i></p>				<p>Requests comment from portfolio companies on their response to identified human rights concerns.</p>
				<p>Discusses response to human rights concerns with portfolio companies.</p>
				<p>Ongoing dialogue with portfolio companies on their approach to identifying, addressing and remediating human rights concerns.</p>
				<p>Proportional to manager's capacity and resources, engages with portfolio companies on risks (based on company profile, sector, product exposure etc), not just incidents, and communicates expectations for management of risks in line with the UNGPs.</p>

- Awareness Building
- Initiating
- Developing
- Developed

## Our Controlled Entities

The University collaborates with our controlled entities to develop a shared approach to modern slavery risks and consults on the development of our Modern Slavery Statement.

In 2025, we reviewed our controlled entities’ saliency risk assessments, drawing on human rights sources and staff input. In line with our Due Diligence Framework, the assessment identified potential links to modern slavery, based on risks inherent to the activity, product, service or partnership. We prioritised actions based on identified risks, focusing on building staff capacity and aligning controlled entities’ due diligence with the University’s framework.

### Salient Modern Slavery Risks for our Controlled Entities\*

**Student placements**

- Exploitative practices at placements in China, particularly in electronics and AI

*Risk: Forced labour*

**Clinical trials**

- Engagement of vulnerable populations, including culturally and linguistically diverse people and children

*Risk: Issues of informed consent*

**Research materials**

- Sourcing of human biomaterials

*Risk: Organ trafficking*

**Patients**

- Patient experiencing modern slavery practices
- Coercion or deception in the donation of gametes

*Risks: Forced marriage, forced labour, forced surrogacy*

**Procurement**

- ICT hardware
- Lab consumables
- Medical equipment
- Cleaning

*Risks: Forced labour, child labour, debt bondage*



\* These examples are intended for illustrative purposes and do not represent any specific incidents at our controlled entities.

Our Objectives	We Delivered	We will measure
<p><b>Embed human rights due diligence</b></p>	<p><b>Westmead Fertility Centre</b></p> <ul style="list-style-type: none"> <li>- Update to the Clinical Governance Committee (Westmead Fertility Centre’s board subcommittee) from the CEO on modern slavery risks and activities.</li> <li>- <u>Policy commitment and approach</u> shared on Westmead Fertility Centre’s website.</li> <li>- Reviewed saliency modern slavery risk assessment and included risks related to clinical trials and sourcing of research materials.</li> <li>- One additional risk area (fertility related research) added to the risk register to be monitored.</li> <li>- All suppliers (204) screened using the KYPPT, with no red flags requiring further assessment.</li> </ul> <p><b>Centre in China – A14 Holdings Pty Ltd</b></p> <ul style="list-style-type: none"> <li>- Provided updates to the Board on modern slavery reporting obligations.</li> <li>- Reviewed saliency risk assessment and developed due diligence actions. Two key priority areas identified following the Centre’s renewed strategic direction: student placements and procurement.</li> <li>- Suppliers screening using the KYPPT, with no red flags identified.</li> </ul> <p><b>Sydney Vietnam Institute – A14 Holdings Pty Ltd</b></p> <ul style="list-style-type: none"> <li>- Eight engagements with Sydney Vietnam Institute’s Executive Director and the Member’s Council on modern slavery risks.</li> <li>- Four engagements with Sydney Vietnam Institute’s Executive Director and the A14 Holdings Board on modern slavery risks.</li> <li>- <u>Policy commitment</u> shared on Sydney Vietnam Institute’s website.</li> <li>- Reviewed the saliency risk assessment, with two key priority areas identified: procurement and research.</li> <li>- Modern slavery risks added to the risk register to be monitored and reviewed regularly.</li> <li>- High value suppliers and all research partners were screened using the KYPPT, with no red flags identified. This represents 26% (21 out of 80) of new partners and vendors.</li> <li>- All high value suppliers completed tender questions on risks of exploitation and compliance with Vietnamese labour law. This represents 6% (4 out of 67) of new vendors.</li> </ul>	<p>#/% of due diligence actions implemented to mitigate identified salient modern slavery risks</p> <p><i>Data collection to commence in 2026.</i></p>
<p><b>Equip our staff and students to identify and report modern slavery</b></p>	<p><b>Westmead Fertility Centre</b></p> <ul style="list-style-type: none"> <li>- Two consultation sessions between Westmead Fertility Centre and the University’s anti-slavery team on modern slavery due diligence.</li> <li>- 15 staff attended training with Dr Jamie Burrows, Visiting Medical Officer and Research Fellow on modern slavery in the healthcare sector.</li> </ul> <p><b>Centre in China</b></p> <ul style="list-style-type: none"> <li>- Three consultation sessions between the Centre in China and the University’s anti-slavery team on modern slavery due diligence.</li> </ul> <p><b>Sydney Vietnam Institute</b></p> <ul style="list-style-type: none"> <li>- Four consultation sessions between Sydney Vietnam Institute and the University’s anti-slavery team on modern slavery due diligence.</li> <li>- 83% of staff (57 of 69) completed the anti-slavery awareness course on identifying and addressing modern slavery risks in the university sector.</li> </ul>	<p>#/% of controlled entity staff engaged that demonstrate increased awareness of modern slavery</p> <p><i>Data collection to commence in 2026.</i></p>

## Modern Slavery as a Public Health Issue



In 2025, seven Westmead Fertility Centre staff attended a Charity Dinner and Seminar, organised by Dr Jamie Burrows, emergency physician and modern slavery researcher. The event highlighted how modern slavery is a public health issue and raised vital funds for Survivor Connections, the first survivor-led, formal peer support initiative in the Australian anti-slavery sector. Staff learnt how to identify indicators of modern slavery in their patients, where to refer reports and how survivors experience the healthcare system in Australia.

“The Modern Slavery Charity dinner was an amazing insightful evening for our team. We learned from the 25 anti-slavery experts who presented and the lived experience voice that cemented the importance of this work.”

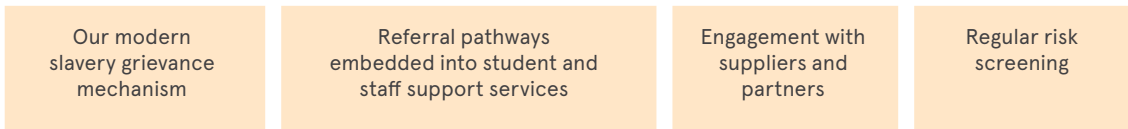
Rosie Gallagher, Patient Care Manager,  
Westmead Fertility Centre

# Grievance and Remedy

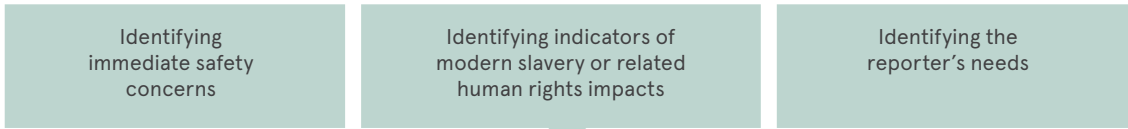
The University is committed to providing an accessible, person-centred and trusted process for reporting concerns about modern slavery or related adverse human rights impacts. We rely on multiple reporting channels to identify potential modern slavery linked to the University, including our grievance mechanism, third-party reporting options, and public reporting.

## Our response to reports of modern slavery

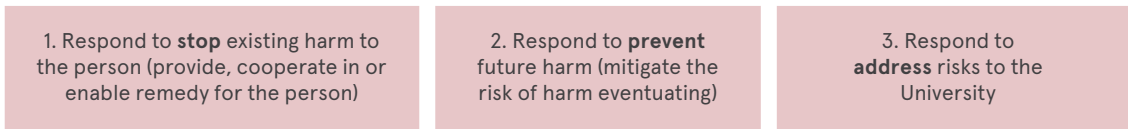
Modern slavery or related human rights report raised via our...



We assess the impact to the person through...



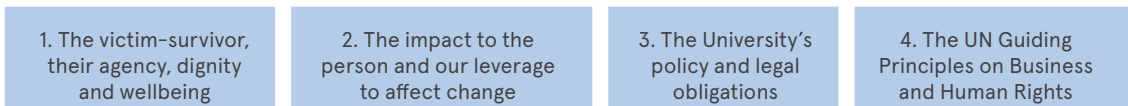
We take action to...



We are committed to remediating modern slavery...



We are informed by...



## 2025 reports with indicators of modern slavery or exploitation

### In 2025, we had 38 reports with potential indicators of modern slavery or exploitation:

- 29% (11) reports were made through our dedicated modern slavery grievance mechanism, our [Modern Slavery Incident Reporting Form](#).
- 71% (27) reports were from other sources, including from our student support services and our collaborations with civil society.
- Most closed cases (15) have been addressed:
  - Where appropriate, remedy has been provided (33%; 5 reports) or support has been offered to the victim-survivor (53%; 8 reports).
  - Two reports were not progressed, due to insufficient information or the reporter’s choice.
- Three additional reports were received in 2025 that did not have any indicators of modern slavery or exploitation.

In 2025, we commenced a comprehensive review to strengthen our modern slavery grievance mechanism. The review included consultations with civil society, worker engagement officers from the Cleaning Accountability Framework and people with lived experience. Over 2026 this feedback will be incorporated into a revised grievance mechanism.

Reports from our grievance mechanism			
Area	Potential indicators of modern slavery or exploitation*	Status	Outcome
<b>Students</b> Reported in 2024, ongoing in 2025	<ul style="list-style-type: none"> <li>- Forced marriage</li> <li>- Parental control</li> <li>- Surveillance</li> </ul>	Closed	<ul style="list-style-type: none"> <li>- Referred to specialist student support services.</li> <li>- Student did not respond to attempts to contact by support services.</li> </ul>
<b>Supply Chain</b> Reported in 2024, ongoing in 2025	<ul style="list-style-type: none"> <li>- Underpayment of wages and entitlements</li> <li>- Lack of payslips</li> </ul>	Closed	<ul style="list-style-type: none"> <li>- Worked with procurement staff and supplier to address issues, including compensation of workers.</li> <li>- Provided supplier with guidance on labour standards and supporting staff to report concerns.</li> <li>- Supplier strengthened their systems to avoid the issues recurring.</li> </ul>
<b>Staff</b>	<ul style="list-style-type: none"> <li>- Excessive overtime</li> <li>- Threats</li> </ul>	Closed	<ul style="list-style-type: none"> <li>- HR investigated case.</li> <li>- No substantiated findings.</li> <li>- HR addressed the concerns with the reporter.</li> </ul>
<b>Students</b>	<ul style="list-style-type: none"> <li>- Underpayment of wages</li> </ul>	Closed	<ul style="list-style-type: none"> <li>- Anonymous report with insufficient information to progress.</li> </ul>
<b>External (community)</b>	<ul style="list-style-type: none"> <li>- Deception</li> <li>- Human trafficking</li> </ul>	Closed	<ul style="list-style-type: none"> <li>- Referred to NSW Anti-slavery Commissioner.</li> </ul>
<b>External (alumni)</b> 3 reports regarding the same concerns	<ul style="list-style-type: none"> <li>- Human trafficking</li> <li>- Labour exploitation</li> <li>- Sexual violence</li> </ul>	Closed	<ul style="list-style-type: none"> <li>- Former student offered support from the University’s student support services.</li> <li>- Case previously reported to the Police.</li> <li>- Provided the reporter with additional anti-slavery support services in the country they are located.</li> </ul>
<b>Staff</b>	<ul style="list-style-type: none"> <li>- Excessive overtime</li> <li>- Fear of speaking up</li> </ul>	Closed	<ul style="list-style-type: none"> <li>- Staff member offered counselling and support to progress report with HR; declined taking report further.</li> <li>- Concerns (de-identified) will be raised with Faculty in 2026.</li> </ul>
<b>Staff</b>	<ul style="list-style-type: none"> <li>- Excessive overtime</li> <li>- Coercion</li> <li>- Psychological harm</li> </ul>	Open	<ul style="list-style-type: none"> <li>- Staff member receiving support from HR, Health &amp; Safety and Union, along with external psychosocial support.</li> <li>- Concerns (de-identified) will be raised with Faculty in 2026.</li> </ul>
<b>Student Placements</b>	<ul style="list-style-type: none"> <li>- Overnight, unpaid work, not within scope of placement</li> </ul>	Open	<ul style="list-style-type: none"> <li>- Under review.</li> </ul>

\*Indicators of modern slavery or exploitation based on reported concerns, not substantiated findings.

## Reports from other sources

Area	Source	Potential indicators of modern slavery or exploitation*	Status	Outcome
<b>Students</b> Reported in 2024, ongoing in 2025	Office of General Counsel	<ul style="list-style-type: none"> <li>- Forced marriage</li> </ul>	Closed	<ul style="list-style-type: none"> <li>- Provided advice to reporter, a staff member, on wellbeing checks on students.</li> <li>- Provided resources on Anti-Slavery Australia and My Blue Sky.</li> <li>- Provided training to relevant staff (Student Administration Services and Justices of the Peace) on forced marriage.</li> </ul>
<b>Students</b> Reported in 2024, ongoing in 2025	Safer Communities Office	<ul style="list-style-type: none"> <li>- Underpayment of wages</li> <li>- Verbal harassment</li> <li>- Threats</li> </ul>	Closed	<ul style="list-style-type: none"> <li>- Referred students to legal support and Anti-Slavery Australia.</li> </ul>
<b>Students</b> Reported in 2024, ongoing in 2025	Students' Representative Council	<ul style="list-style-type: none"> <li>- Scams to gather personal details and request money</li> </ul>	Closed	<ul style="list-style-type: none"> <li>- Students provided with casework and legal support.</li> <li>- Referred to external resources on scams.</li> </ul>
<b>Students</b> Reported in 2024, ongoing in 2025	Safer Communities Office	<ul style="list-style-type: none"> <li>- Forced marriage</li> </ul>	Closed	<ul style="list-style-type: none"> <li>- Student supported by the University's specialist support services.</li> <li>- Referred to Anti-Slavery Australia and Salvation Army.</li> </ul>
<b>Higher Degree Research Student</b> Reported in 2024, ongoing in 2025	Safer Communities Office	<ul style="list-style-type: none"> <li>- Excessive overtime</li> <li>- Fear of speaking up</li> </ul>	Closed	<ul style="list-style-type: none"> <li>- Student supported by Student Counselling Service and provided with resources from the University's anti-slavery team.</li> <li>- Discussed a referral to the University's specialist support services but student was not ready to engage.</li> </ul>
<b>Staff</b>	Email to Modern Slavery Unit	<ul style="list-style-type: none"> <li>- Underpayment of entitlements</li> </ul>	Closed	<ul style="list-style-type: none"> <li>- Referred to HR.</li> <li>- Staff member compensated.</li> </ul>
<b>OECD National Contact Point Complaint against disposable glove supplier</b>	Media	<ul style="list-style-type: none"> <li>- Forced labour</li> </ul>	Open	<ul style="list-style-type: none"> <li>- Collaborative approach with the AUPN (<a href="#">see Case study – Collaborating with other universities to address modern slavery risks associated with disposable gloves</a>).</li> </ul>
<b>Factory monitoring of our ICT supply chain by Electronics Watch</b> Data from Q1 – Q3 2025	Electronics Watch	<ul style="list-style-type: none"> <li>- 20 factories in our ICT supply chain with identified forced labour and/or other labour rights violations, including potential links to 2 factories with reported state-sponsored forced labour in China.</li> </ul>	Open	<ul style="list-style-type: none"> <li>- Electronics Watch has initiated remediation in 85% (17) of factories.</li> <li>- One case suspended, as remedy was not obtained for workers and new monitoring began at the site in 2025.</li> <li>- Exploring options for collaborative responses with other ICT buyers to address concerns of state-sponsored forced labour.</li> </ul>

\*Indicators of modern slavery or exploitation based on reported concerns, not substantiated findings.

## Collaboration and Engagement

As part of our commitment to shared solutions to address modern slavery, in 2025 we collaborated with civil society, academic institutions, industry and government. We participated in over 30 initiatives, forums and meetings with external stakeholders to share perspectives, best practice and learnings.

Our Objectives	We Delivered	We will measure
<p><b>Contribute to multi-stakeholder collaboration to influence change</b></p>	<p><b>Collaboration with universities</b></p> <ul style="list-style-type: none"> <li>- Collaborated with Monash University Centre for Financial Studies on a good practice framework for modern slavery grievance mechanisms.</li> <li>- Worked with universities, QUT, Macquarie, Griffith, and Melbourne, through the Red Cross Steering Committee to support the <u>Student Work Right Hub</u>.</li> <li>- Hosted a sector-wide roundtable with 44 attendees from 11 universities on international student modern slavery risks.</li> </ul> <p><b>Engagement with Industry &amp; Government</b></p> <ul style="list-style-type: none"> <li>- Engaged with the NSW Office of the Anti-slavery Commissioner through the Health Working Group.</li> <li>- Contributed to consultations for the Australian Anti-Slavery Commissioner’s Strategic Plan and the Australian Government’s Modern Slavery Act reforms.</li> <li>- Engaged with federal and NSW government stakeholders, including the Department of Foreign Affairs and Trade, the Department of Climate Change, Energy, the Environment and Water and Transport for NSW.</li> <li>- Presented to 35 Clean Energy Council members on the University’s approach to addressing human rights risks in renewable energy procurement.</li> <li>- Presented to 30 participants at the Australian Government Human Trafficking &amp; Modern Slavery Research Network on our approach to addressing modern slavery risks in research.</li> <li>- Delivered a student-focused presentation, alongside the Fair Work Ombudsman, Red Cross Australia, and Youth Law NSW.</li> </ul> <p><b>Contributed to shared solutions to address modern slavery.</b></p> <ul style="list-style-type: none"> <li>- Hosted a <u>roundtable</u>, alongside Monash University, with Anti-Slavery Australia, the Australian Red Cross, International Justice Mission, The Salvation Army, Be Slavery Free, Australian Catholic Anti-slavery Network, the Cleaning Accountability Framework and Electronics Watch, to identify trauma-informed, transparent approaches to modern slavery grievance mechanisms.</li> <li>- Raised awareness of modern slavery in the everyday products we buy through a display of Anti-Slavery Australia’s interactive <u>Human Mart</u> exhibition at the University of Sydney Community Festival, with 91% attendees saying they would take action, including researching and supporting ethical business.</li> <li>- Participated in a roundtable on responsible procurement in renewable energy technology, hosted by the University of Sydney and the Australian Anti-Slavery Commissioner.</li> <li>- Joined the UN Global Compact Network Australia’s Modern Slavery Working Group.</li> </ul>	<p># of contributions by the Modern Slavery Unit to policy development, business practice or community initiatives on human rights.</p> <p><i>Data collection to commence in 2026.</i></p>

Our Objectives	We Delivered	We will measure
<p><b>Enable our academics to inform evidence-based practice on human rights</b></p>	<p><b>Enabled our anti-slavery academics to contribute to policy, business and community initiatives on human rights</b></p> <ul style="list-style-type: none"> <li>- 6 new members joined the University's Modern Slavery Academic Network, taking the total to 29 across 6 disciplines.</li> <li>- Held our first Research Spotlight to connect academics across the University and share current research.</li> <li>- Led a review of opportunities for research and education acceleration in modern slavery and human rights, with input from our academics and industry and civil society partners, including ASEAN-ACT and the UK Modern Slavery and Human Rights Policy and Evidence Centre (MS PEC).</li> </ul>	<p># of academics actively participating in our Modern Slavery Academic Network</p> <p>#/% of anti-slavery academics that have contributed to policy development, business practice or community initiatives on human rights</p> <p><i>Data collection to commence in 2026</i></p>



Anti-Slavery Australia's Human Mart exhibition at the University of Sydney Community Festival. Photo: University of Sydney



# Assessing Our Effectiveness

Our Theory of Change

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Our Impact Measurement Framework

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## Our Theory of Change

Our Theory of Change provides our long-term vision for tackling modern slavery and respecting human rights across the University community. It provides a roadmap for how we will progress meaningful impact over the next five years, which will be measured using our Impact Measurement Framework.

# Our Theory of Change

Our vision is to have a meaningful impact on the global challenge of modern slavery.

We will achieve this if we...

## OUTCOMES



Find modern slavery in the University's operations and supply chains and address it

Contribute to solution-focused modern slavery research, education and partnerships

which will only be possible if we...

## OBJECTIVES



1. Embed human rights due diligence University-wide

2. Equip our staff and students to identify and report modern slavery

3. Contribute to multi-stakeholder collaboration to influence change

4. Enable our academics to inform evidence-based practice on human rights

which will require us to deliver...

## ACTIVITIES



- Modern Slavery policy and governance framework
- Due diligence framework
- Annual saliency risk assessment
- Risk-based due diligence plans
- Worker-driven monitoring
- Modern Slavery Statement

- University-wide mandatory staff training
- Risk-based staff training
- Student engagement and training
- Student support services
- Risk identification tools and resources
- Grievance mechanism

- University sector collaboration
- Engagement with government, business and civil society
- Enabling people with lived experience to contribute to solutions
- Shared responsibility with our suppliers and partners
- Shared resources and tools
- UN Global Compact membership

- Modern Slavery Academic Network
- Facilitate engagement opportunities with government, business and civil society
- Evidence-based tools
- Policy relevant research
- Public events

which we will evaluate using....

## IMPACT INDICATORS



### Our Impact Measurement Framework

%/# of modern slavery risks and impacts to the University that were addressed

#/% of collaborators who report engagement with the University of Sydney has improved their approach to modern slavery and related human rights impacts

Indicators on the effectiveness of our due diligence across our supply chain, research, partnerships, investments and controlled entities

Indicators on the effectiveness of our staff and student training

Indicators on contributions by our anti-slavery experts to policy, business and community initiatives on human rights

which will be guided by....

Our key stakeholders: Staff, students, partners, community and people with lived experience

The UN Guiding Principles on Business and Human Rights

Commonwealth and NSW modern slavery obligations and guidance

Our values: Trust, Accountability, Excellence

Sydney in 2032 Strategy

## Our Impact Measurement Framework




**OUTCOME: Find modern slavery in the University's operations and supply chains and address it**


Evaluated by...



#/% of modern slavery risks and impacts to the University that were addressed

Which will be measured by our effectiveness in achieving our objectives...

	<b>Objective 1: Embed human rights due diligence University-wide</b>	
	We will measure...	We will demonstrate this through...
<b>GRIEVANCE MECHANISM</b>	#/% of reports with modern slavery indicators to the University that were addressed.	<ul style="list-style-type: none"> <li>– Reports via our grievance mechanism and other channels.</li> <li>– Feedback from affected stakeholders on response and remedy.</li> </ul>
<b>SUPPLY CHAIN</b>	#/% of procurement projects over \$250k identified as inherent high risk for modern slavery.	– Screening using the Know Your Partner & Project Tool.*
	#/% of inherent high risk procurement projects where the University reduced the residual risk.	– Implementation of our high risk due diligence process.
<b>RESEARCH</b>	#/% of teams engaging with external entities screening projects and partners for human rights impacts.	– Screening using the Know Your Partner & Project Tool.*
	Case studies on high risk research projects where the University reduced the residual risk, through implementation of mitigants.	<ul style="list-style-type: none"> <li>– Development of risk-based due diligence actions.</li> <li>– Engagement with researchers and research support staff on implementation of mitigants.</li> </ul>
<b>INVESTMENTS</b>	% of the University's investment portfolio screened for human rights violations.	– Quarterly screening of our publicly listed portfolio and annual screening of our private equity portfolio using our Know Your Partner & Project database.*
<b>CONTROLLED ENTITIES</b>	#/% of due diligence actions implemented by our controlled entities to mitigate identified salient modern slavery risks.	<ul style="list-style-type: none"> <li>– Annual saliency risk assessment.</li> <li>– Implementation of risk-based due diligence plans.</li> </ul>

	<b>Objective 2: Equip our staff and students to identify and report modern slavery</b>	
	We will measure...	We will demonstrate this through...
<b>ENGAGEMENT &amp; TRAINING</b>	#/% of staff in high risk roles that demonstrate increased awareness of how to identify and report modern slavery risks. <i>Includes Procurement, Research and Controlled Entities.</i>	– Pre and post training surveys.
	#/% of students and student-facing staff engaged that demonstrate increased awareness of modern slavery and increased confidence in seeking or referring to support.	– Pre and post training surveys.




**OUTCOME: Contribute to solution-focused modern slavery research, education and partnerships**


Evaluated by...



**#/% of partners and collaborators who report engagement with the University of Sydney improved their approach to modern slavery and related human rights impacts.**

Which will be measured by our effectiveness in achieving our objectives...

	<b>Objective 3: Contribute to multi-stakeholder collaboration to influence change</b>	
	We will measure...	We will demonstrate this through...
<b>SUPPLIER ENGAGEMENT</b>	Case studies on supplier engagement on modern slavery risks.	<ul style="list-style-type: none"> <li>– Engagement with procurement and suppliers on changes to their approach to modern slavery, following engagement.</li> </ul>
<b>INVESTMENT FUND MANAGER ENGAGEMENT</b>	#/% of managers with high risk holdings engaged on modern slavery risk.	<ul style="list-style-type: none"> <li>– Analysis of our portfolio for sector-specific risks.</li> <li>– Engagement with fund managers.</li> </ul>
	#/% of managers with high risk holdings that demonstrate a maturity in their approach to managing modern slavery risks, following engagement.	<ul style="list-style-type: none"> <li>– Fund managers' progress on our Human Rights Maturity Framework.</li> </ul>
<b>EXTERNAL ENGAGEMENT</b>	# of contributions by the Modern Slavery Unit to policy development, business practice or community initiatives on human rights.	<ul style="list-style-type: none"> <li>– Partnerships and collaborations with government, business and civil society.</li> <li>– Feedback from partners.</li> </ul>

	<b>Objective 4: Enable our academics to inform evidence-base practice on human rights</b>	
	We will measure...	We will demonstrate this through...
<b>ACADEMIC ENGAGEMENT</b>	# of academics actively participating in our Modern Slavery Academic Network.	<ul style="list-style-type: none"> <li>– Participation in one or more initiative annually (e.g. government consultation, event).</li> </ul>
	#/% of anti-slavery academics that have contributed to policy development, business practice or community initiatives on human rights.	<ul style="list-style-type: none"> <li>– Annual engagement survey with Modern Slavery Academic Network.</li> <li>– Feedback from partners.</li> </ul>

\* *The Know Your Partner & Project Tool* was developed by the University of Sydney to screen prospective partners and projects for human rights violations, sanctions, legal action and business misconduct. It brings together publicly available, reputable sources to identify risks in over 20,000 entities, individuals and locations.

In 2025 we updated our Impact Measurement Framework. Data collection and reporting will commence in 2026.



# Our Action Plan for 2026

As we continue to strengthen the University’s approach to identifying and addressing modern slavery risks, we are committed to work that is meaningful, transparent, and aligned with the outcomes set out in our Due Diligence Framework.

Our Outcome	Our objectives & priorities
Find modern slavery in the University’s operations and supply chains and address it	<p>Embed human rights due diligence by:</p> <ol style="list-style-type: none"> <li><b>1. Identifying risks</b> <ul style="list-style-type: none"> <li>– Conduct an annual review of salient modern slavery risks.</li> <li>– Strengthen our risk screening and assessment for high-risk research activities, partnerships and suppliers.</li> <li>– Expand uptake of the Know Your Partner &amp; Project Tool across faculties and schools.</li> </ul> </li> <li><b>2. Engaging suppliers and partners</b> <ul style="list-style-type: none"> <li>– Deepen engagement and shared responsibility with suppliers.</li> <li>– Engage directly with workers in our supply chain to better understand their experiences and the impact of our actions on the ground.</li> </ul> </li> <li><b>3. Strengthening our grievance identification and remediation</b> <ul style="list-style-type: none"> <li>– Update the University’s grievance mechanism to align with best practice and incorporate feedback from affected stakeholders.</li> </ul> </li> </ol> <hr/> <p><b>Equip our staff and students to identify and report modern slavery</b></p> <ul style="list-style-type: none"> <li>– Continue building the capability of research, procurement and student support staff to identify risk indicators and access support pathways.</li> <li>– Refresh the Anti-Slavery Awareness training module for staff.</li> </ul>
Contribute to solution-focused research, education and partnerships	<p><b>Contribute to multi-stakeholder collaboration to influence change</b></p> <ul style="list-style-type: none"> <li>– Embed lived experience perspectives into program design, research and training.</li> <li>– Publish our methodologies, tools and sector guidance to support sector knowledge-building.</li> </ul> <hr/> <p><b>Enable our academics to inform evidence-based practice on human rights</b></p> <ul style="list-style-type: none"> <li>– Continue to develop the University’s Modern Slavery Academic Network and incorporate academic expertise into our due diligence.</li> <li>– Create opportunities for engagement and partnerships between academics, government, industry, civil society and people with lived experience.</li> </ul>

# Glossary

<b>Affiliate</b>	Has the meaning given in the <i>Modern Slavery Policy</i> .
<b>AFP</b>	Australian Federal Police.
<b>AFP HECO</b>	Australian Federal Police Human Exploitation Community Officers.
<b>AUPN</b>	Australasian Universities Procurement Network.
<b>Controlled entity</b>	Has the meaning given in the <i>Modern Slavery Policy</i> .
<b>Due Diligence Framework</b>	Our <u>principles and methodology</u> for identifying, assessing, addressing and remediating modern slavery and related human rights impacts across our operations, supply chain, partnerships, investments and controlled entities.
<b>ESG</b>	Environmental, social and corporate governance.
<b>Electronics Watch</b>	Electronics Watch uses public procurement leverage to promote and protect the rights of workers in global supply chains. Together with their affiliated public authorities and civil society monitoring partners, they coordinate industry-independent supply chain monitoring and facilitate the remediation of human rights abuses in public sector ICT and low-emission vehicle (LEV) supply chains.
<b>Grievance mechanism / Modern Slavery Incident Reporting Form</b>	<p>The University of Sydney’s confidential <u>online form</u> to report cases of suspected modern slavery linked to the University. The form is open to staff, students, partners, suppliers and members of the public.</p> <p>Reports are investigated in line with our Due Diligence Framework, with a focus on the trauma-informed principles of safety, trustworthiness, choice and empowerment.</p> <p>The University’s dedicated anti-slavery team manages the form and works closely with internal and external specialist support to ensure that any reports received through grievance channels are thoroughly investigated and, where appropriate, remedy is provided.</p>
<b>Human rights due diligence</b>	<p>According to the UNGPs, human rights due diligence involves assessing actual and potential human rights impacts, integrating and acting upon the findings, tracking responses, and communicating how impacts are addressed.</p> <p>Human rights due diligence:</p> <ul style="list-style-type: none"> <li>– Should cover adverse human rights impacts that the business enterprise may cause or contribute to through its own activities, or which may be directly linked to its operations, products or services through its business relationships;</li> <li>– Will vary in complexity with the size of the business enterprise, the risk of severe human rights impacts, and the nature and context of its operations;</li> <li>– Should be ongoing, recognising that the human rights risks may change over time as the business enterprise’s operations and operating context evolve.</li> </ul>
<b>KYPPT</b>	Know Your Partner & Project Tool, the University of Sydney’s bespoke risk screening tool for research, procurement, investments and other third-party partnerships and engagements. The KYPPT brings together publicly available, reputable risk sources to identify human rights violations, sanctions, legal action and business misconduct for over 20,000 entities, individuals and locations.
<b>Lived experience</b>	A ‘person with lived experience’ describes someone who has directly experienced modern slavery. This definition is consistent with the Australian Government’s guidance on <i>Modern Slavery Lived Experience Engagement and Empowerment</i> (2024). We recognise that other terms, including but not limited to, ‘victim’, ‘survivor’, ‘victim-survivor’, ‘survivor leader’, and ‘survivor advocate’ may also be used. We also recognise that individuals have preferences on how they self-identify, and these terms may not resonate with some people.
<b>Modern slavery</b>	Has the meaning given in the <i>Modern Slavery Policy</i> .

<b>Modern Slavery Act</b>	Means the <i>Modern Slavery Act 2018</i> (Cth).
<b>Modern Slavery Act (NSW)</b>	Means the <i>Modern Slavery Act 2018</i> (NSW).
<b>Partner</b>	Has the meaning given in the <i>Modern Slavery Policy</i> .
<b>PSA</b>	University of Sydney Peer Support Advisor.
<b>Saliency</b>	According to the UNGPs, the saliency of an adverse human rights impact considers: Severity of the risk to people, based on: <ul style="list-style-type: none"> <li>- Scale – the gravity of the adverse impact.</li> <li>- Scope – the reach of the impact, for example the number of individuals that are or will be affected.</li> <li>- Irremediable character – how hard it would be to remedy the harm.</li> </ul> And the likelihood of the risk to occur.
<b>Sedex</b>	Sedex is a technology company that uses data analysis to provide risk assessments of supply chains, identifying any human rights or sustainability risks, and provides solutions to manage these risks.
<b>SMETA Audit</b>	The SMETA Audit is a social audit of a supply chain undertaken by Sedex. It is aimed at increasing transparency of labour and ethical standards within a supply chain, identifying any risks or abuses of workers' rights (e.g. forced labour) and suggesting corrective action so they can be remedied.
<b>SRC</b>	University of Sydney Students' Representative Council
<b>Supplier</b>	Has the meaning given in the <i>Modern Slavery Policy</i> .
<b>SUPRA</b>	Sydney University Postgraduate Representative Association
<b>UNGPs</b>	The United Nations Guiding Principles on Business and Human Rights are a set of principles that outline to States and businesses their obligations to protect human rights.
<b>USU</b>	University of Sydney Union

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The following list outlines where information related to each mandatory reporting criterion in the Modern Slavery Act can be located within our statement.

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<b>Describe the reporting entity's structure, operations and supply chain</b>	Who we are (p. 6) Identifying, Assessing and Addressing our Modern Slavery Risks – Our People (p. 16) – Our Supply Chain (p. 18) – Our Investments (p. 33) – Our Controlled Entities (p. 36)
<b>Describe the risks of modern slavery practices in the operations and supply chain of the reporting entity and any entities it owns or controls</b>	Identifying, Assessing and Addressing our Modern Slavery Risks: – Our Potential Risks to People (p. 14) – Modern Slavery Risks in Our Value Chain (p. 15) – Our People (p. 16) – Our Supply Chain (p. 18) – Our Research Activities (p. 27) – Our Support to Students (p. 30) – Our Investments (p. 33) – Our Controlled Entities (p. 36)
<b>Describe the actions taken by the reporting entity and the entities it owns or controls to assess and address these risks, including due diligence and remediation processes</b>	Our Approach to Addressing Modern Slavery: – Our journey so far (p. 8) – Our Due Diligence Framework (p. 9) – How we delivered on our 2025 commitments (p. 10) Identifying, Assessing and Addressing our Modern Slavery Risks: – Our People (p. 16) – Our Supply Chain (p. 18) – Our Research Activities (p. 27) – Our Support to Students (p. 30) – Our Investments (p. 33) – Our Controlled Entities (p. 36) – Grievance and Remedy (p. 39) – Collaboration and Engagement (p. 41)
<b>Describe how the reporting entity assesses the effectiveness of these actions</b>	Our Approach to Addressing Modern Slavery: – Our Due Diligence Framework (p. 9) – How we delivered on our 2025 commitments (p. 10) Identifying, Assessing and Addressing our Modern Slavery Risks: – Our Supply Chain (p. 18) – Our Research Activities (p. 27) – Our Support to Students (p. 30) – Our Investments (p. 33) – Our Controlled Entities (p. 36) – Grievance and Remedy (p. 39) Assessing our Effectiveness: – Our Theory of Change (p. 46) – Our Impact Measurement Framework (p. 48)
<b>Describe the process of consultation with any entities the reporting entity owns or controls</b>	Who we are (p. 6) Our Controlled Entities (p. 36)
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