



Australian
National
University

Modern Slavery Statement 2025

Reporting period
1 January 2025 - 31 December 2025



Content Warning

This statement may refer to exploitation, forced labour, forced marriage, trafficking and other serious abuses related to modern slavery which some readers may find distressing. Seeking assistance for feelings of distress or emotional difficulty is always encouraged, and support services are readily available.

Support Services

Modern slavery takes on a multitude of forms and can occur suddenly or very gradually. If you are currently, or have ever been, subject to coercion, violence, deception or any other worrying conduct, you can contact the support services below.

For emergency situations, please contact **Emergency Services on 000 (or 0000 if dialing from an internal phone)**.

ANU Campus Security is available should you feel unsafe on campus. They operate 24 hours, 7 days a week, and can also assist in emergencies following a 000 call. They can be contacted by dialing +61 2 52249.

Free 24-hour community counselling resources include:

- **Lifeline** – 13 11 14
- **Beyond Blue** - 1300 22 4636

Students at the University can access:

- **The ANU Wellbeing and Support Line** by calling 1300 050 327 or texting 0488 884 170. They are free and available 24 hours to help with situational stress, emotional difficulties and mental health concerns. The service can also be used to provide debriefing support and assistance.
- **The University's Harmful Behaviours Disclosure Tool** to report any incidences of exploitation, misconduct, violence, bullying or harassment. This can be found on the ANU website under *Health, Safety and Wellbeing – getting help at ANU*.

For free interpreter services, call Translating and Interpreting Service on 131 450.

Alternatively, you can escalate the matter to one of the following providers:

- **Anti-Slavery Australia** (+61 2 9514 8115; asalegal@uts.edu.au)
- **Legal Aid ACT Helpline** (1300 654 314)
- **The Salvation Army Additional Referral Pathway** – for human trafficking assistance (1800 000 277; arp@salvationarmy.org.au)
- **Life Without Barriers** – for specialised forced marriage support (1800 403 413)

Modern Slavery Risk Management

The University Risk Office collates modern slavery risk management activities and recommends improvements where necessary to the University's current framework for due diligence, reporting mechanisms and awareness.

They can be contacted by emailing riskoffice@anu.edu.au.

Acknowledgement of Country

The Australian National University (ANU) acknowledges the Ngunnawal and Ngambri-Kamberri people, who are the Traditional Owners of the land upon which the University's Acton campus is located.

This Ngunnawal and Ngambri-Kamberri land supports students and staff throughout their time at the University. It will continue to hold a space for future generations to come together and learn from Country and one another.

We pay our respects to all Aboriginal and Torres Strait Islander peoples, Indigenous peoples, past and present, and acknowledge that this land from which we benefit has an ancient history that is both rich and sacred.

The University community makes a commitment to respect the land upon which we stand and to ensure that the voices of this land's Indigenous peoples are heard and listened to, so that we may move towards a future marked by cooperation and mutual respect.

The University also acknowledges the historical and ongoing impacts of colonisation on Aboriginal and Torres Strait Island people. This helps to inform our commitment to approach modern slavery risk management with respect, care, and accountability.

The University acknowledges people with lived experience of modern slavery and serious exploitation, including forced labor, human trafficking, forced marriage, debt bondage, servitude and the worst forms of child labour. We recognize the dignity, strength and expertise of survivors and affected communities, and the importance of respectful and trauma-informed approaches to identifying and responding to modern slavery risks.

Table of Contents

Acknowledgement of Country.....	2
About this Statement	4
2025 Snapshot.....	5
Section 1 Who We Are, Our Governance and Our Value Chain	7
Our Role	7
Our Functions.....	7
Our Values	7
Structure and Governance.....	8
ANU Structure	9
Supply Chain Profile	11
Our Wholly Owned Entities.....	14
Section 2 Our Risk-Based Approach to Modern Slavery.....	16
Section 3 Modern Slavery Risks and Mitigants Taken In 2025	17
Value Chain Areas Overview	17
Workforce and Employment	20
Our Procurement and Campus Services.....	21
Students, Recruitment and Educational Placements.....	23
Research Contracts and Partnerships	25
Investments.....	25
Philanthropy and gifts	26
Controlled Entities.....	27
Grievance, Remediation, and Response	28
Teaching, Learning and Research Contribution	28
Section 4 How the University Assessed Effectiveness.....	29
Section 5 Our Anti-Slavery Action Plan for 2026.....	30

About this Statement

This Modern Slavery Statement is made on behalf of The Australian National University, its subsidiaries and group entities over which it exercises control. For the purposes of this Statement, these entities include:

- ANU Enterprise Pty Ltd;
- ANU International Holdings;
- ANU(UK) Foundation

This Statement identifies The Australian National University (ANU) as the reporting entity and addresses the mandatory criteria in section 16 of the *Modern Slavery Act 2018* (Cth) for the reporting period 1 January to 31 December 2025.

It describes the University's structure, operations and supply chains; the modern slavery risks the University has identified; the actions taken during 2025 to assess and address those risks; and how the University assessed the effectiveness of those actions.

The University recognizes that modern slavery risks can exist beyond direct contractual relationships, particularly where supply chains are complex, goods are manufactured offshore, or labor-intensive activities are outsourced. This Statement reflects both information available through direct University systems and consultation with relevant portfolios and controlled entities, while acknowledging that visibility may vary across different parts of the University's operations, supply chains and broader value chain.

Important Judgement

The University did not treat the absence of reported human rights matters as evidence that risk was absent.

Modern slavery is frequently hidden, underreported, and difficult to detect. The University therefore combines reported information with risk indicators, contextual judgement, and a focus on where people may be most vulnerable.

2025 Snapshot

The figures below provide a snapshot of the scale and coverage of the University operations and activities relevant to this Statement.

Our people

23,677 Enrolled students 14,050 Domestic Students 9,643 International Students	3,072 Domestic commencing enrolments	3,281 International commencing enrolments
4,769 Staff Professional and academic workforce	3,693 Ongoing employees 1,076 Non-ongoing employees	Over 148,000 Alumni Global alumni community

Our Education and Research Activities

801 / 219 Placement providers / agreements 374 students secured placements or internships in 2025	544 Students on exchange From more than 123 partner institutions in 26 countries	829 Total number of research projects
---	--	--

Our Campus and Operations

Over \$12M Maintenance expenditure in 2025	\$36 million Capital works expenditure in 2025	388 Buildings managed 500,000 m2 of floor
17,031 Maintenance work orders were raised during 2025	2,300 CCTV cameras across campus	21,477 Facilities work orders raised and completed
Student residences 13 ANU-managed 2 Outsourced	Over 5700* Beds available on campus	2,547 Events held across campus
\$71.50m Philanthropic support secured	97.1% The Long-Term Investment Pool (LTIP) manager statement coverage Share of LTIP assets covered by managers that provided a modern slavery statement	

Our Supply Chain

\$ 428.1M Total 2025 procurement spend (\$)	5100+ Vendors used in 2025 Across 81 supplier countries	92% Spend with Australia-based suppliers Major offshore concentration remains IT hardware.
--	---	--

Our Controlled Entities

16 FTE ANU Enterprise workforce Supported by around 60 to 80 academic subcontractors per year	8 FTE ANU International Holdings Engages local vendors: schools, universities, agents, event organisers	4 FTE ANU (UK) Foundation £472K Total Donations and Gifts received in 2025
---	---	--

Section 1 Who We Are, Our Governance and Our Value Chain

Our Role

The Australian National University (ANU) was established in 1946 by federal legislation and is the first and only national university in Australia. Founded to provide our nation and our region with the research and education foundations required to build capacity and support national prosperity, the University continues to fulfil a mission of enduring national significance.

Since our establishment, the University has addressed some of most complex challenges facing Australia and the world, by bringing together leading experts with a strong interdisciplinary focus. This approach has enabled transformational discoveries and outcomes that benefit the nation and contribute to global progress. It is both our privilege and responsibility.

Our Functions

In line with the *Australian National University Act 1991*, the functions of the University include:

- advancing and transmitting knowledge;
- encouraging and providing facilities for research and post-graduate study;
- providing facilities for university education generally, including in the visual and performing arts;
- awarding and conferring degrees and diplomas;
- providing opportunities for those with post-secondary qualifications to obtain higher education qualifications; and
- engaging in extension activities.

In performing our functions, we must pay attention to the University's national and international roles and to the needs of the Australian Capital Territory (ACT) and surrounding regions.

As we progress through the second quarter of the 21st century, the University must continue to generate the knowledge, insight and leadership required to shape Australia's future. Central to this is our commitment to knowing the Country on which we stand, understanding its rich history, and embedding First Nations languages, cultures and knowledge throughout our university and across our campus.

Our Values

Our values underpin our institutional culture, guide the work of our staff and students, and shape the activities we undertake. These values are:

- Academic freedom and integrity;
- Fairness and justice;
- Respecting, celebrating and learning from First Nations Peoples;
- Safety and wellbeing;
- Truth-seeking, transparency and accountability;
- Inclusion, equity and diversity; and
- Respectful collegiality.

These values support the University's commitment to identifying, assessing and addressing modern slavery risks across its operations, supply chain and broader value chain.

Structure and Governance

The University is governed under the auspices of the University Act and the *Public Governance, Performance & Accountability Act 2013* (PGPA Act). Under the University Act, the governing authority of the University is the University Council which comprises the Chancellor¹; members appointed by the Commonwealth Minister for Education; and members elected from within the University community of staff and students.

The governance arrangements of the University operate to provide assurance to Council, via its committees and the Internal Audit Program in respect of risk oversight, management and reporting. Each committee of Council has a publicly accessible charter that outlines its membership and responsibilities.

The University's governance arrangements support oversight of modern slavery risk through existing risk, assurance and reporting mechanisms. Council, as the University's principal governing body, is responsible for approving the Modern Slavery Statement. The Audit, Finance and Risk Committee supports Council by providing independent assurance, advice and assistance in relation to risk oversight, financial management and performance reporting.

The Council oversees the strategic direction of the University and ensures that effective governance and responsible financial and risk management are maintained. The Council appoints the Vice-Chancellor and, except where restricted by the University Act, delegates management of the University to the Vice-Chancellor, as principal academic and Chief Executive Officer of the University.

- Professor Genevieve Bell AO FTSE FAHA FASSA was appointed as the 13th Vice-Chancellor and President of the University until 10 September 2025.
- Professor Rebekah Brown FASSA commenced as Interim Vice-Chancellor and President of the University in September 2025.

In 2025, the University established the University Risk Office within the Legal, Governance and Risk Division and assigned the Chief Risk Officer responsibility to provide guidance on the University's modern slavery risk management approach, including coordination of the University's annual Modern Slavery Statement and continuous improvement activities.

Operational responsibility for implementing controls relevant to the mitigation of modern slavery risk vests across multiple portfolios, including procurement and campus operations, student recruitment and support, placement and mobility programs, research contracts, finance and investments, advancement and controlled entities. This reflects exposure to modern slavery risk is distributed across the University's value chain, rather than confined to one business unit.

¹ The Hon. Julie Bishop was appointed as the 13th Chancellor of the Australian National University in 2020 for an initial three-year term. In 2021, the Council extended her appointment for a further four years. Ms Bishop resigned from the position on 7 May 2026.

ANU Structure

The University has six academic Colleges, each housing schools and research centres. The Colleges are responsible for delivering the core functions of undergraduate and postgraduate education and research within their respective fields.

- ANU College of Arts and Social Sciences;
- ANU College of Asia and the Pacific;
- ANU College of Business and Economics;
- ANU College of Law, Governance and Policy;
- ANU College of Systems and Society; and
- ANU College of Science and Medicine.

Operational Footprint and Value Chain

The University operates three sites in the Australian Capital Territory (ACT); Acton, Mt Stromlo Observatory and Spring Valley Farm. There are three other campus locations across Australia; Kioloa Coastal Campus and Siding Spring Observatory in New South Wales (NSW), and the North Australia Research Unit (NARU) in Northern Territory. The University also operates several rural clinical schools in NSW (Eurobodalla, Bega, Cooma, Cowra, Goulburn and Young).

The University has 15 student residences located on or near our Acton campus in Canberra. Two of the residences are affiliated, meaning they are owned and staffed independently of the University. The remaining student residences are owned and operated in a hybrid model. These are managed by the University, with some services contracted to UniLodge.

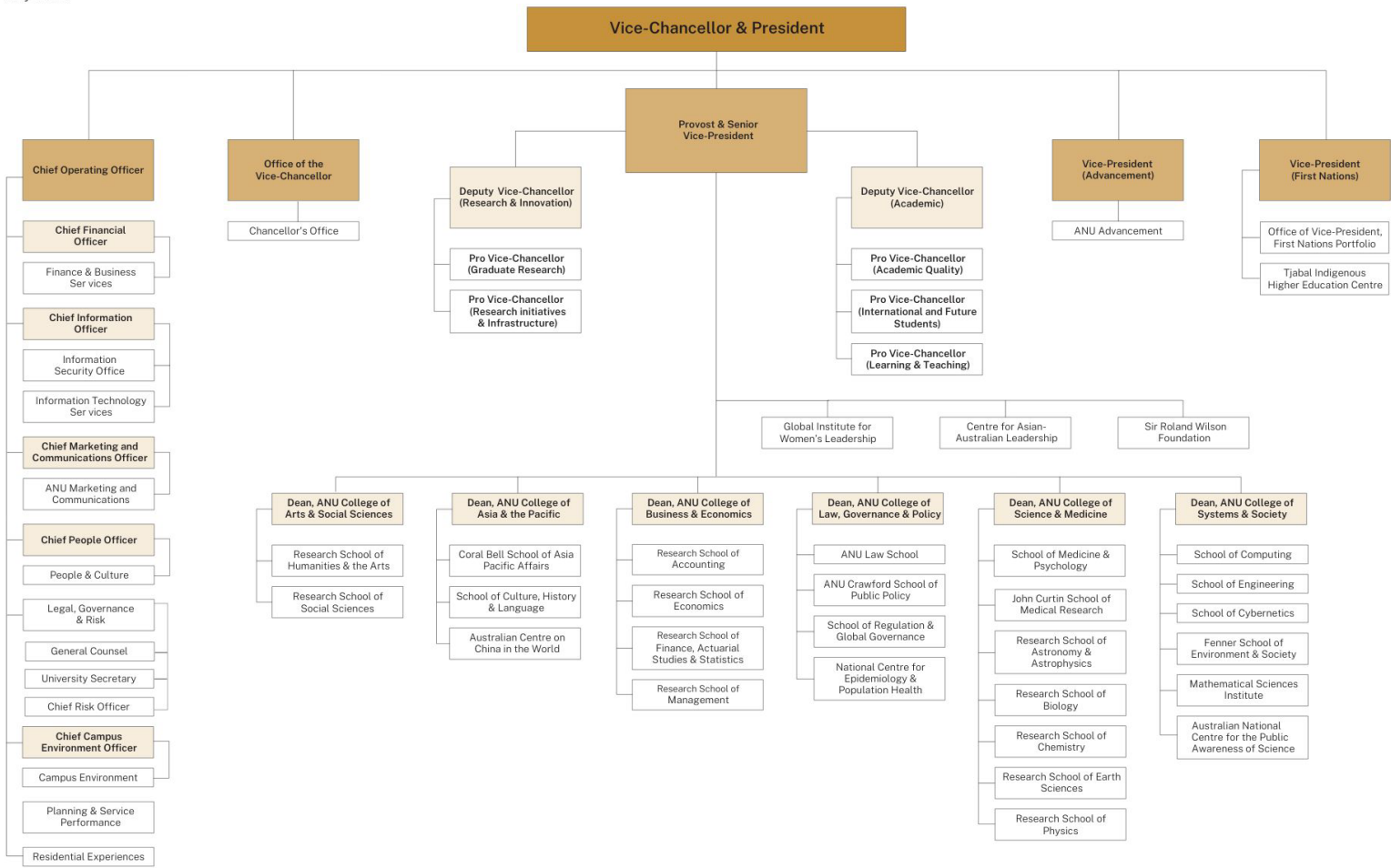
During the reporting period, the University had a number of commercial tenants that operated on our sites, including 89 on the Acton site, 5 across other ACT locations, and 34 on sites outside of the ACT.

Our operations create a wide range of procurement and labour-related relationships, including for construction, maintenance, cleaning, security, Information & Communications Technology (ICT), laboratory and scientific supplies, hospitality, travel and other services. These relationships are generally managed through the University's procurement, contracting and operational processes.

The University's broader value chain includes third-party relationships, with education agents, placement hosts, research collaborators, donors, investment managers, mobility partners, international business relationships and controlled entities. Responsibility for contracting due diligence and ongoing management of these relationships sits with the relevant functional areas. The University recognises that these relationships may also create modern slavery risks, particularly where operations involve vulnerable students, overseas delivery, subcontracting, international partners, donor relationships or limited visibility over third-party practices.

ANU Executive

July 2025



Supply Chain Profile

The University is a major procurer of a wide range of services, goods and capital works necessary to support the operations of the University. Procurement at the University is guided by our *Procurement: Policy and Procurement Procedure*. The University recognises that modern slavery risks are not limited by geographic location.

The University has over 5,100 vendors incorporated both domestically and internationally, with the majority of University supplier spend occurring with Australian-based companies. The major exception to this is in relation to IT hardware.

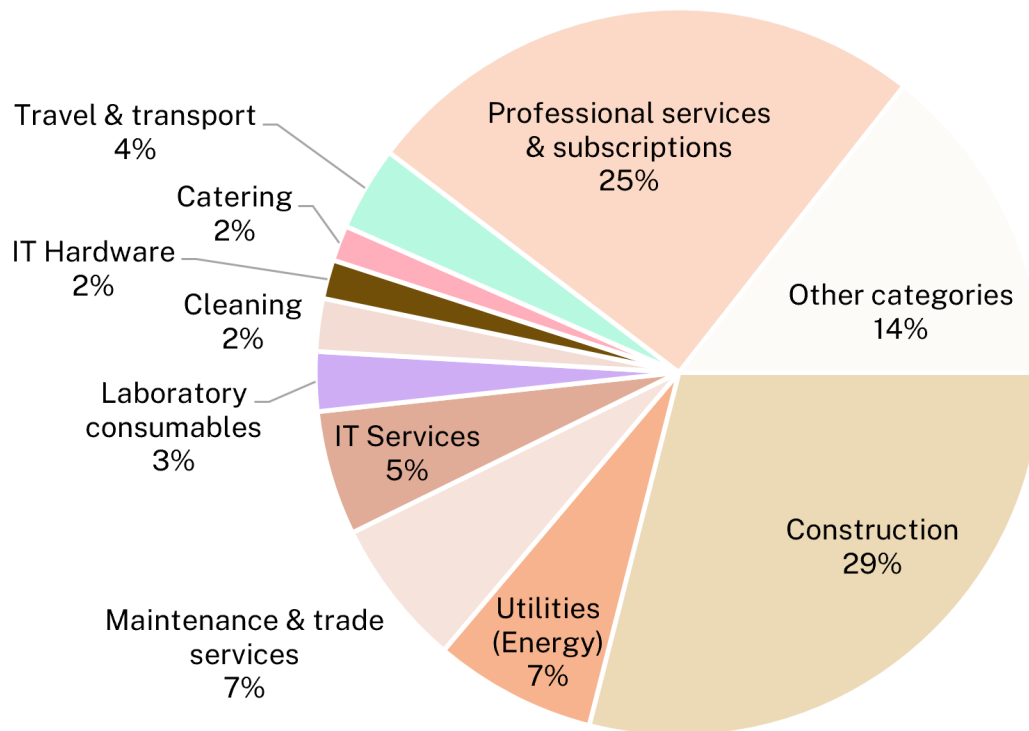
The University's procurement activities involve a combination of short-term and longer-term supplier arrangements. A list of university-wide contracts is available on the University website.

	Total 2025 procurement spend \$428,147,889	Top countries by spend ✓ Australia (92%) ✓ United States of America (1.8%) ✓ China (1.7%) ✓ Hong Kong (1.0%)
---	--	--

Our supply chain spend can be split into the following broad categories:

	Property and facilities	• Construction • Cleaning • Security • Catering • Energy
	Business Services	• Investment Services • Marketing and Media • Travel • Information Technology Services • IT Hardware • Research & Teaching • Laboratory and Animal Care Supplies • Library supplies

Distribution of the University Procurement Spend in 2025



Distribution of High-Risk Procurement in 2025²

Construction
28.97% of total procurement spend
52.70% of the high-risk categories

Utilities (Energy)
7.22% of total procurement spend
13.14% of the high-risk categories

Maintenance
6.56% of total procurement spend
11.93% of the high-risk categories

IT Services
5.53% of total procurement spend
10.05% of the high-risk categories

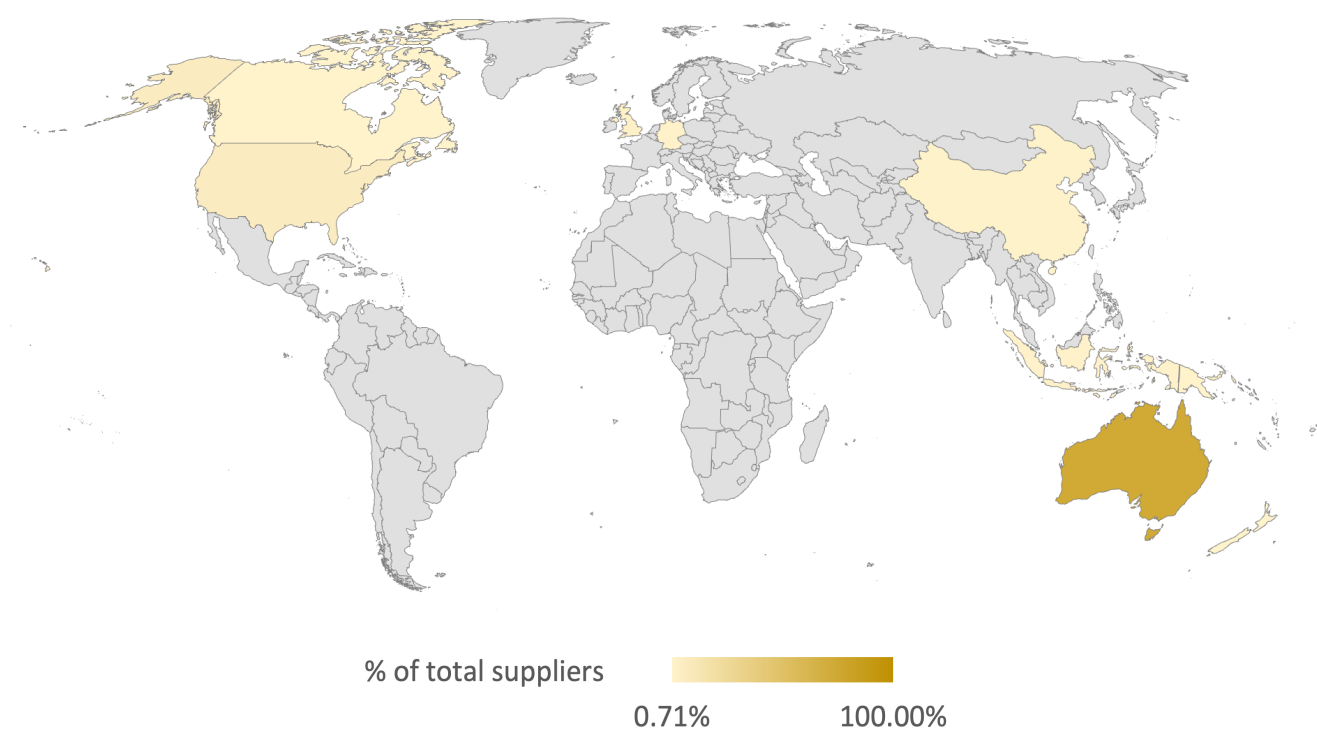
Lab & Teaching Consumables
2.64% of total procurement spend
4.80% of the high-risk categories

IT Hardware
1.73% of total procurement spend
3.15% of the high-risk categories

Cleaning
2.34% of total procurement spend
4.26% of the high-risk categories

² Further detail on why these areas have been assessed as higher risk is provided on page 21 of this Statement.

Top 10 Countries by Procurement Spend³



<i>Country</i>	<i>Number of suppliers</i>	<i>% of total suppliers</i>
Australia	3,843	74.11%
United States	337	6.50%
United Kingdom	136	2.62%
China	98	1.89%
Indonesia	75	1.45%
Germany	69	1.33%
Papua New Guinea	48	0.93%
New Zealand	44	0.85%
Singapore	41	0.79%
Canada	37	0.71%
Other countries	459	8.85%
Total	5,187	100%

³ Further detail on why these areas have been assessed as higher risk countries is provided on page 21 of this Statement.

Our Wholly Owned Entities

ANU Enterprise Pty Ltd

ANU Enterprise Pty Ltd is a wholly owned subsidiary of the University. It was established in 1979 as a not-for-profit, for-purpose company. Its sole purpose is to provide value to the University through a multitude of services, measured against performance indicators (financial and non-financial) as approved by the University council. ANU Enterprise supports ANU Research and Innovation and Academic Portfolios. They provide engagement, tender and project management services tailored to meet the needs of academics. These services enable researchers to focus on their academic expertise while maximising the societal impact and commercial potential of the University research. It employed 16 FTE staff and around 60 to 80 subcontractors in 2025, all of whom are ANU academics or researchers.

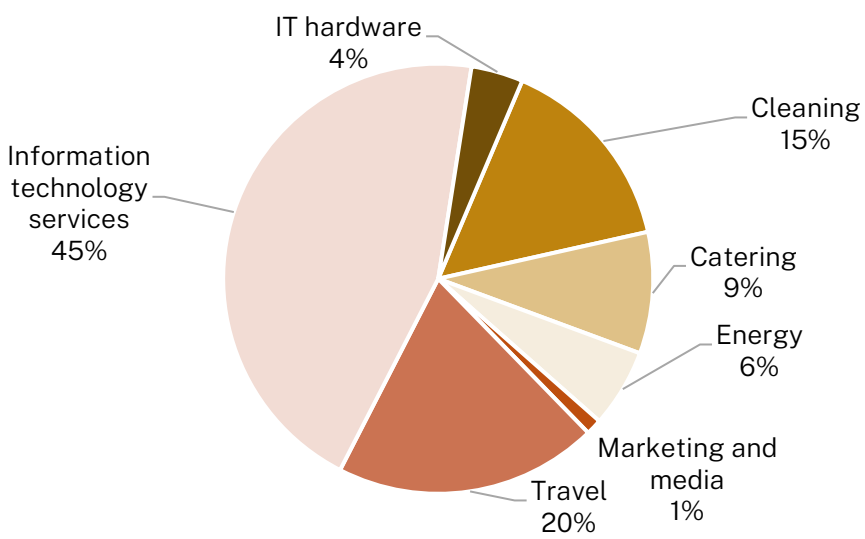
ANU Enterprise Pty Ltd and its subsidiaries form part of the broader University operational and governance structure. Relevant activities undertaken by these entities are reflected within the operational profile and reporting scope of this Statement, unless otherwise specified.

ANU Enterprise Pty Ltd oversees two subsidiaries:

- **The Social Research Centre Pty Ltd** – Acquired in 2014, the Social Research Centre (SRC) is a for-profit organisation delivering innovative social research and evaluation services to researchers, policymakers, academics and business leaders. SRC collaborates closely with ANU academic units, including POLIS: The Centre for Social Policy Research and the National Centre for Epidemiology and Population Health, and aims to be Australia’s leading provider of high-quality social research.
- **Australian Scientific Instruments Pty Ltd** – Established in 1997, ASI originally manufactured and commercialized specialized scientific instruments developed by the ANU Research School of Earth Sciences. Following the sale of its business lines, ASI ceased operations effective 1 January 2024. However, it remains a registered entity to maintain licensing and royalty flows to the University.

During the 2025 reporting period, the total reported spend across the categories reviewed was \$201,042. A breakdown of expenditure by procurement category is provided below.

2025 ANU Enterprise Procurement Spend



ANU (UK) Foundation

The ANU (UK) Foundation, constituted in England and Wales, facilitates grants, donations and bequests on behalf of the University, in alignment with the University's strategies. Its purpose is to strengthen the University's global engagement and philanthropic reach within the United Kingdom by maintaining strong connections with alumni across the United Kingdom and Europe, promoting excellence in education and research, and supporting initiatives that foster knowledge exchange, collaboration and student mobility with leading United Kingdom and European universities.

Current focus areas for the (UK) Foundation are:

- the London Alumni Scholarship, supporting students from disadvantaged backgrounds to study at Australian National University
- the Sustainable Farms Initiative, advancing research and practices for environmental sustainability
- postgraduate scholarships for students in the ANU Research School of Earth Science.

The (UK) Foundation is a registered charity established under the UK Companies Act 1985 and does not currently meet the UK Modern Slavery Act 2015 section 54 mandatory reporting threshold.

ANU International Holdings

ANU International Holdings Pty Ltd is a wholly owned subsidiary of the University, incorporated in Australia. It provides a legal and operational framework for supporting University's international activities. ANU International Holdings Pty Ltd owns Beijing ANU International Business Consulting Co. Ltd, a wholly owned foreign entity incorporated in China.

Through the China Liaison Office, ANU International Holdings supports the University activities in China, including liaison, events, marketing, recruitment, government relations and alumni engagement. The China Liaison Office reports to the Pro Vice-Chancellor (International & Future Students). The Director of the China Liaison Office is responsible for identifying, escalating and managing human rights and modern slavery risks relevant to the Office's activities.

The China Liaison Office engages eight locally employed staff under written employment contracts. It also works with local vendors to support professional services, including schools, universities, agents through the ANU International and Future Students Division, and event organisers. Supplier checks include formal service agreements and verification of supplier legal qualifications and business licences through Chinese authority websites.

Section 2 Our Risk-Based Approach to Modern Slavery

The University recognises that modern slavery is a grave human rights abuse and a serious crime. In 2025, the University continued to broaden its modern slavery risk management approach beyond procurement, with increased attention to risks across operations, supply chains, partnerships, students, research, investments and controlled entities.

The University understands the potential to cause, contribute to, or be linked to modern slavery through our operations and supply chains and is committed to taking meaningful and appropriate action to address the risks identified. Central to this commitment is:

- a continually improving policy framework which embeds ethical conduct and risk management in all relevant policies;
- building internal capacity to recognise and respond to modern slavery indicators through the provision of targeted training and awareness raising;
- undertaking screening and due diligence activities to mitigate potential risks introduced with partner engagement; and
- collaborating with other universities to address sector-specific risks. Key risks and mitigants⁴ are detailed in section 3.

The University prioritises risks by looking at the severity of potential impact on people. Severity is considered with reference to three questions:

- Scale – how serious could the impact be?
- Scope – how many people could be affected?
- Remediation – how hard would it be to put the harm right?

This approach helps University prioritise attention on the risk areas most likely to involve serious exploitation, even where the University has limited direct leverage or incomplete visibility.

How the University identified, managed and monitored modern slavery risks in 2025

Identify and assess	Mitigants	Track, review and communicate
The University used spend data, contract review, questionnaire responses, placement screening, manager reviews and stakeholder insight to identify where people may be vulnerable to modern slavery practices.	The University used contractual controls, screening tools, host approval processes, donor due diligence, investment expectations, training and escalation pathways to prevent, reduce or respond to risk.	The University monitored output such as screening coverage, training completion, supplier engagement, placement checks, investment manager statements and governance reporting, then reported publicly and identified priorities for improvement.

The University recognises the importance of meaningful stakeholder engagement, accessible reporting pathways, and a role in remediation where the University has caused or contributed to harm. These elements are maturing, with work underway to continuously improving and embedding our practices consistently across the University.

⁴ The University refers to actions as mitigants within this statement

Section 3 Modern Slavery Risks and Mitigants Taken In 2025

Value Chain Areas Overview

The priority risk areas noted in the table over reflect the University's current understanding of where inherent modern slavery risks may arise across its operations, supply chains and broader value chains. These areas were identified using available information from procurement spend data, contract review, questionnaire responses, portfolio consultations, stakeholder input and existing control processes.

The University recognises that our approach to modern slavery risk management is still maturing, and that risk identification is not yet applied consistently across all operations, third-party relationships and controlled entities.

In considering modern slavery risks across its value chain, the University had regard to risk factors commonly used in modern slavery guidance and sector practice:

- **Sector, product and service risk** – whether the activity involves sectors, goods or services with known modern slavery indicators, including labor-intensive services, offshore manufacturing, complex supply chains, subcontracting, or goods linked to forced labour or child labour.
- **Geographic risk** – whether goods, services or activities are connected to countries or regions with higher vulnerability to modern slavery due to governance, labour rights, migration, conflict, poverty or documented exploitation.
- **Workforce and vulnerable population risk** – whether workers, students or other affected people may have reduced bargaining power, limited knowledge of their rights, migration-related vulnerability, financial pressure, dependence on sponsors or hosts, or limited confidence to report concerns.
- **Third-party and partner risk** – whether suppliers, contractors, agents, placement hosts, research collaborators, donors, investment managers or controlled entities have limited transparency, weak governance, adverse human rights indicators or limited visibility over their own operations and supply chains.
- **Visibility and leverage risk** – whether the University has limited visibility beyond its direct contractual relationship, including beyond tier-one suppliers, or limited practical ability to influence the conduct of subcontractors, offshore manufacturers or downstream partners.

Value chain area	Why risk may arise	Reason for prioritising
Workforce and employment	Employment-related risk may arise where workers have limited bargaining power, migration-related vulnerability, labour hire dependence, or reduced visibility in outsourced, casual or contractor arrangements.	Exploitation in workforce arrangements can involve serious harm to workers in or linked to the University operations. The University has practical influence through employment settings, labour hire oversight, procurement controls and internal reporting pathways.
Procurement and campus services	Procurement and campus services may involve goods and services with higher inherent modern slavery risk due to labour-intensive service delivery, subcontracting, offshore manufacturing, complex global supply chains and limited visibility beyond direct suppliers. Higher-risk procurement categories identified in 2025 included building repair and construction, information and communications technology, scientific equipment and laboratory supplies, international student recruitment and commercial cleaning.	The University's scale of spending supplier breadth and concentration in labour-intensive and globally sourced categories create exposure to potentially severe harm. Procurement and contracting processes provide practical leverage to strengthen supplier expectations, contractual controls and risk-based engagement.
Students, recruitment and educational placements	Students may be vulnerable to deception, improper charging, sponsor pressure, underpayment, unsafe work, migration-related leverage, or dependence on host organisations.	Students may face serious harm through recruitment, sponsorship, work and host-placement arrangements. The University has direct leverage through agent contracts, placement approvals, student support settings and program design.
Research contracts and partnerships	Complex delivery models, overseas partners, fieldwork, and limited data on subcontracting can reduce visibility over labour practices in research-related activity.	Research activity can involve higher-risk jurisdictions, partners, subcontracting and field delivery models with limited visibility. The University has practical leverage through contract screening, approval processes, contractual terms and escalation pathways.
Philanthropy and gifts	The University may be linked to exploitation through the source of donated funds, donor conduct or weaknesses in due diligence over high-value or sensitive gifts.	Philanthropic relationships may create reputational and human rights exposure. The University has practical influence through donor due diligence, gift acceptance processes and governance escalation.

Investments	The University may be linked to exploitation through investee company conduct, external manager practices or operations and supply chains linked to underlying investments.	Investment-related risks may occur beyond the University's direct operations. The University has leverage through manager engagement, investment screening, contractual expectations and governance oversight.
Controlled entities	Controlled entities and international operating arrangements may involve local employment, local procurement, subcontractors, recruitment-related activity, student-facing engagement, events, local vendors or third-party service providers outside central system.	These entities form part of University's broader reporting boundary and may have distinct risk profiles due to their operating model, location, or third-party relationships. The University retains influence through ownership, governance expectations, targeted consultation, reporting and escalation arrangements.

Workforce and Employment

The University employs a diverse workforce across academic and professional roles that support the University’s teaching, research and operational activities. Our direct workforce is employed predominantly within Australia and under operations an established legal and industrial relations frameworks. This reduces, but does not remove, the risk of modern slavery practices in University’s operations. Workforce-related risk is more likely to arise where individuals have limited bargaining power or reduced confidence in raising concerns, including in labour hire, contracting, outsourced services, casual engagement and other contingent workforce arrangements. Whilst not eliminated Australian workers benefit from better protections.

In 2025, our workforce-related controls were primarily compliance-based. These included standard recruitment and onboarding processes, central employment policies and procedures, compliance with workplace laws and industrial instruments, and access to existing complaints, misconduct, integrity and work health and safety channels. The University acknowledges the existence of these baseline controls does not fully eliminate employment-related modern slavery risk. Improvement work has already been identified for labour hire, contractor oversight, worker awareness and clearer escalation pathways.

Work Health and Safety

Work health and safety processes form part of the University is broader control environment for identifying and responding to workplace harm, including unsafe work, coercion, harassment or other indicators that may overlap with modern slavery risk. While these mechanisms are not modern slavery-specific, they provide existing pathways through which staff, contractors or other workers may raise concerns about unsafe or exploitative conditions.

Complaints and Issue Resolution Mechanisms

The University also maintains formal internal grievance procedures to support the fair, timely and transparent resolution of concerns. Staff may raise concerns through the *Staff Grievance Resolution Policy* and associated procedures, and additional reporting pathways are available under the *Public Interest Disclosure Framework*.

2025 Key Mitigants	
Direct employment framework	The workforce is employed within the Australian legal and industrial relations framework, with central employment policies and procedures applying across employment arrangements.
Recruitment and employment compliance	The University applies to standard recruitment, pre-employment and onboarding processes, together with compliance obligations under workplace laws and industrial instruments.
Worker reporting pathways	Staff are able to access existing complaints, misconduct, integrity and work health and safety pathways relevant to workplace concerns. The University is in the process of inserting specific modern slavery grievance channels into existing processes.

Labour hire and indirect workforce practices	The University recognises that employment-related modern slavery risk may be higher in labour hire, contractor, and casual arrangements which are mitigated through our workforce-related controls.
Education & Training	The University provides training and awareness activities that support staff capability and promote informed risk behaviour across the University community.

Our Procurement and Campus Services

The University's procurement and campus services remained a priority risk area in 2025 due to the University's scale of spend, supplier breadth, labour-intensive service categories and reliance on goods with complex global supply chains.

For procurement and campus services, the University also considered category, country and supplier-level exposure. In 2025, this assessment was supported by the Arc-Blue Modern Slavery Risk Rating Tool, which draws on external risk data and sector guidance, including the Global Slavery Index, anti-slavery resources and relevant government procurement guidance.

This tool combines an assessment of:

- **Category risk** using data obtained from:
 - The Global Slavery Index (Walk Free Foundation);
 - RESEPECT (Responsible and Ethical Private Sector Coalition against Trafficking);
 - ACAN (Australian Catholic Anti-Slavery Network); and
 - Guidance on Reasonable Steps to manage modern slavery risks (NSW Anti-slavery Commissioner).
- **Country risk**
 - Based on the Global Slavery Index data by country using the Total Vulnerability Score (out of 100).
- **Supplier risk**
 - A model that takes country, category and risk into consideration.

The tool then assigns an aggregated AUPN perceived risk for a (normalised) supplier to support an overall procurement risk rating.

This approach helped identify procurement categories with higher inherent modern slavery risk, including building repair and construction, Information and Communications Technology, scientific equipment and laboratory supplies, international student recruitment and commercial cleaning. These categories are associated with one or more risk factors, including labor-intensive service delivery, subcontracting, offshore manufacturing, complex global supply chains and limited visibility beyond direct suppliers.

The University Procurement team and central services are aware that modern slavery may be present in our supply chain, particularly with respect to the provision of hardware manufactured offshore in countries with large amounts of low skilled labour, where modern slavery has been identified as occurring or likely to occur.

Further insight from the supplier engagement activities indicates that common challenges include limited understanding and managing modern slavery indicators, gaps in supply chain transparency, and a need for clearer guidance on practical risk mitigation techniques.

The University has implemented a number of mitigants and due diligence measures to manage modern slavery risks within procurement activities, as outlined below.

2025 Key Mitigants	
Contractual controls	Modern slavery clauses remained embedded in the University legal procurement precedents, with additional provisions applied to higher-risk contracts. Clauses were also considered when extending agreements or accepting supplier terms, supporting consistent contractual safeguards across procurement activities.
Training and internal capability	Modern Slavery Awareness Training remained established practice in Information Technology Services, Campus Environment, and Finance and Business Services. New staff in these procurement areas are expected to complete training within their first three months, improving awareness of red flags and due diligence expectations.
Sector and 3rd party collaboration through AUPN	Engagement participated in expert-led sessions and forums through the Australian University Procurement Network (AUPN), covering due diligence frameworks, lived experience insights, risk identification tools and sector benchmarking. These engagements, including contributions from the NSW Anti-Slavery Commissioner, Electronics Watch and Fair Supply, strengthened internal capability and awareness of emerging modern slavery risks.
Medical and laboratory consumables engagement	Targeted engagement was undertaken with five high-risk suppliers identified through the SAQ program, including the University co-leading dialogue with one supplier in partnership with University of Sydney. In response, the University created a short easy-to-use suppliers anti-slavery toolkit with six recommendations suppliers can take to improve their modern slavery awareness and risks. Universities have access to this tool and can send it to suppliers as required. Further to this, AUPN began a detailed review into modern slavery risks in the medical gloves sector. This process builds on a review conducted in 2021 and will be finalised in 2026.
ICT supply chain transparency	The University joined 22 universities in an Electronics Watch pilot monitoring 27 factories across seven countries. Common issues identified included legal wages, health and safety, discrimination, excessive hours and forced labour. Remediation was underway in 13 cases, with two cases requiring direct university engagement.

Students, Recruitment and Educational Placements

We recognise modern slavery risk for students can arise through third-party recruitment practices, sponsor dependence, financial pressure, workplace exploitation, poorly designed placements, and overseas or external learning experiences where students may have limited bargaining power. Some students may be vulnerable due to migration status, unfamiliarity with workplace rights or dependence on host organisations to complete course requirements.

Student Recruitment

International and Future Students advised no specific modern slavery issues were reported in student recruitment processes in 2025. Existing monitoring and assurance processes did not identify any concerns during the reporting period.

The University continues to treat student recruitment as a priority risk area, recognising that students may be vulnerable to a range of practices that could increase their exposure to modern slavery risks including, but not limited to, recruitment processes, financial arrangements and third-party interactions.

2025 Key Mitigants	
Agent agreements and contractual expectations	All education agent agreements include modern slavery terms. These require agents to take reasonable steps to identify, record, report, govern and plan against modern slavery risks.
Monitoring and consequences	The University uses ongoing monitoring and reporting to the University committees on agent performance, with sanctions available for non-compliant agents up to and including contract termination.
Local market visibility	The University maintained in-country representatives across key recruitment markets including China, Malaysia and Singapore, Indonesia, India, Vietnam and North America, giving the University a trusted point of contact and additional visibility in local markets.
Training and direct student support	Agents, in-country representatives and Canberra-based staff receive regular training in identifying, escalating and responding to modern slavery concerns. Prospective students also have access to direct support and verified information on programs, fees, admissions and visa processes without needing to pay extra charges to the University -aligned staff.

Placements, internships and overseas programs

Work-integrated learning and placements expanded as a reporting focus in 2025. The University reported 801 placement providers and 219 placement agreements through the In-Place system, enabling 374 students across four colleges to secure placements and internships. The University delivered 58 internship opportunities through the College of Science and Medicine and the College of Business and Economics programs and sent 544 students on exchange to more than 123 partner institutions in 26 countries.

The University noted placement hours do not count toward international student visa work limits in several settings. This reduces a potential source of leverage or coercion by host organisations.

2025 Key Mitigants	
Host vetting and formalisation	Across colleges, host organisations are screened before placements proceed. Controls include meetings with hosts, review of previous engagement, mandatory documentation such as codes of conduct and public liability insurance, formal host agreements, and approval of project scopes by academic convenors.
Student preparation and reporting pathways	Students receive orientation and guidance on expectations, safe workplaces, reporting options and support pathways. Programs also use evaluations, tutor or convenor contact, workshops, careers consultations and wellbeing check-ins to detect or respond to concerns.
Engineering placements	For ENGN3200 and ENGN6200 Engineering Internship, placements must be paid and paid placements must meet Fair Work minimum rates. Unpaid engineering practical experience is limited, documented and subject to Fair Work compliance clauses. Students are advised not to exceed required course hours for unpaid placement.
Law internships and clinical placements	Law internship hosts are screened for legitimacy and suitability. Hosts are reminded that unpaid interns should not perform the duties of regular employees. Clinical placements operate under formal agreements or Memorandums of Understanding (MoUs) and established host relationships.
Overseas and high-context programs	For the Law and Development Clinic in Cambodia, the University relies on established NGO partners, New Colombo Plan risk requirements, pre-departure briefings and weekly support sessions. For exchange activity more broadly, the University generally uses partner institutions and organisations with an existing relationship with the University, supported by pre-departure guidance and welfare arrangements.

Research Contracts and Partnerships

In 2025, modern slavery risk considerations were incorporated into existing Research Contracts Office review processes, rather than through a standalone modern slavery-specific screening tool. The review relied on available contract and project information, including the nature of the project, collaborators, jurisdictions involved and contractual arrangements.

The research portfolio acknowledges that this process was dependent on the quality of available information and that stronger data capture, including use of an e-form system and improved governance records, has been identified as a priority for 2026.

2025 Key Mitigants	
Risk screening and assessment of research activities	The Research Contracts Office screened 829 local and international research contracts or projects for modern slavery risk in 2025. The University treats this outcome cautiously. It reflects the contracts screened and the quality of available data, rather than establishing that research-related modern slavery risk is absent
Identification of higher-risk matters	No projects were identified as higher risk through the screening process.
Escalation pathways	No matters were escalated to the DVC(RI), Legal or Ethics Committees on modern slavery grounds in 2025.
Nature of collaborators	Collaborators were generally described as established organisations in lower-risk countries.
Exposure to top-tier risk jurisdictions	No projects were reported in top-tier risk countries through the 2025 screening process.
Contractual controls	Modern slavery clauses are included as standard in all subcontracts, collaboration and services contracts issued by the University.

Investments

The University holds an investment portfolio and recognises that modern slavery risk can arise through investee company conduct, portfolio manager practices and operations or supply chains linked to underlying investments. The University's external asset managers are contractually required, where relevant, to comply with applicable modern slavery laws and maintain their own statements, policies and procedures. This requirement applies to asset managers with segregated mandates, currently covering two asset managers and approximately 50% of Long-Term Investment Pool assets.

The Investment Office undertakes modern slavery-related activities through contractual requirements, annual review of external manager documentation, targeted risk assessment for managers outside modern slavery reporting regimes, and positive screening within equity portfolios.

2025 Key Mitigants	
Manager's statement review	The Investment Office conducts an annual review of modern slavery statements from all external asset managers. As of 31 December 2025, 97.1% of LTIP assets covered by managers were managed by entities that had provided a modern slavery statement.
Review of out-of-scope manager controls	For out-of-scope managers, the approach includes proactive controversy monitoring, direct company engagement, supply chain due diligence, constructive recommendation to companies where improvement pathways exist, and ongoing monitoring of regulatory developments, disclosure and third-party controversy flags.
Positive screening in equity portfolios	In 2025, the University introduced a positive screen aligned to UN Global Compact Principles 4 and 5. In practice, this aims to increase capital allocation toward companies demonstrating commitments to eliminating forced labour and child labour, while reducing portfolio exposure companies with higher indicators of poor worker treatment and weak compliance systems.
Legacy exposure monitoring	Pre-2018 private equity exposure remained below 0.1% of LTIP assets, limiting residual legacy exposure outside the current reporting architecture.

Philanthropy and gifts

In 2025, the University secured approximately \$71.50 million in philanthropic support. The University recognises that modern slavery risks may arise in connection with philanthropy and gifts and undertakes due diligence to support the traceability of financial and in-kind contributions and to assess and address the risk that they may be connected to modern slavery misconduct.

2025 Key Mitigants	
Due diligence for major gifts	Every prospective donor giving \$250,000 or more is subject to due diligence research. Factors reviewed include foreign arrangements, foreign interference, gambling, greenhouse gas intensive industries, tobacco, alleged or confirmed criminality, alleged or confirmed civil disputes, modern slavery, the sex trade, weapons and political activity.
Governance and escalation	The Advancement Division manages the solicitation and stewardship of gifts within the University's <i>Gifts and Fundraising Policy</i> framework and determines whether sensitive or precedent-setting gifts are appropriate for the University. They are not aware of any gifts declined in 2025 for modern slavery reasons.

Controlled Entities

Ongoing consultation and maturity uplift

The University regards consultation with controlled entities as an area of continuing maturity. The direct responses received from ANU Enterprise Pty Ltd, ANU(UK) Foundation and ANU International Holdings strengthened entity-level visibility in 2025. The University's wholly controlled entities have different operating models and risk profiles.

ANU Enterprise Pty Ltd

2025 Key Mitigants	
Due diligence and controls	ANU Enterprise advised that it uses ABN, ASIC and ABR checks together with blacklist searches on international agencies before engaging relevant external parties. Its contracts and standard terms include conduct, labour standards, modern slavery, compliance and audit provisions.
Known issues and next steps	ANU Enterprise reported no known allegations or indicators of labour exploitation, poor working conditions or related ethical concerns. It identified clearer escalation guidance and refresher training as priorities for the next 12 months.

ANU International Holdings (China Liaison Office)

2025 Key Mitigants	
Governance and escalation	This year, the University Risk Office consulted with this entity as part of its modern slavery risk management activities. The Director of the China Liaison Office is accountable for overseeing the identification, escalation and management of modern slavery risks. The Office operates in alignment with applicable Chinese labour and employment requirements, the University staff conduct expectations and the local staff handbook, with escalation pathways to the Pro Vice-Chancellor (International & Future Students) where appropriate.
Student-facing activities and local operations	The China Liaison Office advised that no complaints or warning signs had arisen in relation to recruitment, and that activities involving minors or other vulnerable groups are conducted under applicable Chinese legal requirements and the University expectations. Local procurement covers routine office and operational services such as administration, events, transport and ICT, with formal service agreements and checks of supplier legal qualifications and business licences through Chinese authority websites. No third-party cleaners, drivers, security or similar workers were reported during 2025, no workforce-related concerns were identified in the past three years, and no modern slavery concerns were reported. The Office indicated that further online training using the University clauses, policies and guidance would help strengthen capability.

Grievance, Remediation, and Response

Current Approach

In 2025 we relied on a range of existing grievance mechanisms, including whistleblower, behavioural integrity, student support, work health and safety, placement incident, complaints and contract management pathways. These pathways can identify or escalate concerns connected with exploitation, unsafe work, coercion, wage theft, improper recruitment or other conduct that may intersect with modern slavery risk.

If the University identifies a concern	Response options currently available
Suppliers and contractors	The University may seek further information, pause work, review contract performance, require corrective action, rely on contractual rights, or terminate the arrangement where appropriate.
Students and placements	The University may provide wellbeing support, facilitate discussions with the host, adjust project scope, change supervisors or hosts, provide alternative assessment arrangements, or withdraw the student from an unsafe environment.
Research or international activity	The University may seek legal or specialist advice, revisit approval settings, strengthen contractual controls, suspend activity, or escalate matters to relevant internal committees or external authorities.
Potential victim support and referrals	Where there is reason to believe that a person may have experienced serious exploitation, the University may consider support referrals, safeguarding steps and contact with external agencies consistent with the circumstances and the person's safety.

The University recognises that this response architecture is still uneven and can be difficult to navigate and that it did not operate a dedicated modern slavery reporting channel in 2025.

Teaching, Learning and Research Contribution

The University's response to modern slavery is not limited to compliance. The University also contributes through teaching, research and student engagement. Modern slavery continues to be integrated into parts of the curriculum in the College of Business and Economics, including accounting and management discussions about reporting, labour standards and ethical supply chains.

During 2025, the University Law students continued to contribute to a partnership with Walk Free and Wiki Rate under academic supervision by Professor Jolyon Ford. Students supported evaluation of modern slavery reporting and related research activity, including for-credit internship work that helped build practical capability in analysis, advocacy and corporate accountability.

Section 4 How the University Assessed Effectiveness

The University assessed effectiveness in 2025 using a mix of coverage measures, governance oversight, practical follow-up and qualitative judgement from the teams responsible for implementation. These measures provide a foundation for a more mature framework.

Key Value Chain Areas	How the University assessed effectiveness in 2025	Current limitation
Workforce and Employment	The University relied on general employment compliance settings, recruitment and onboarding processes, central employment policies, and existing complaints, integrity and work health and safety pathways as indicators of foundational workforce control coverage.	The University had not yet completed a dedicated labour hire and contingent workforce modern slavery risk assessment in 2025, and workforce-specific effectiveness measures remain underdeveloped.
Procurement	The University reviewed higher-risk categories, embedded training in key procurement teams, used AUPN collaboration, and received visibility into supplier remediation activity through sector initiatives.	Coverage remains strongest at direct supplier and category level. Deeper tier visibility and impact measures are still limited.
Students and placements	The University relied on host screening, formal agreements, student orientation, evaluations, convenor and tutor oversight, well-being check-ins and incident pathways to identify emerging concerns.	Data and controls are not yet captured in one enterprise-wide system across all student-facing activities.
Research contracts	The Research Contracts Office tracked screening coverage centrally.	Nil higher-risk findings may reflect data and screening limitations, especially for fieldwork, subcontracting and delivery contexts not readily visible in current systems.
Controlled entities	The University obtained dedicated responses from our Wholly Owned Entities and considered central governance materials.	Entity-level metrics, consultation cadence and escalation expectations are not yet fully standardised across all entities the University owns or controls.

Section 5 Our Anti-Slavery Action Plan for 2026

The University's modern slavery risk management approach is continuing to mature. Through engagement with internal stakeholders and sector-wide initiatives, the University has identified opportunities to strengthen awareness, prevention, risk identification, escalation and response measures across areas that may affect students, staff, suppliers, partners and other members of the University community.

Action Focus for 2026

❖ Clear Reporting and Support Pathways

The University will publish a simple guide for staff, students, suppliers and contractors explaining modern slavery indicators, where to raise concerns, and how matters will be referred for support and action. This will include clear information on the role of the University's Integrity Office, which will be set up as the central pathway for receiving, triaging and escalating concerns, including those that may relate to modern slavery. This responds to the current finding that reporting pathways are uneven and can be difficult to navigate and supports a more victim- and survivor-centred response.

❖ Workforce and Labour Hire Checks

The University will add a small set of modern slavery checks to labour hire, contractor and outsourced service onboarding and contract renewal processes. This will focus on worker recruitment practices, passport and identity document handling, wage payment, accommodation arrangements where relevant, and complaint pathways.

❖ Targeted Supplier Due Diligence in High-Risk Categories

The University will pilot enhanced due diligence for a manageable number of higher-risk categories, starting with areas already identified in this Statement such as ICT, laboratory consumables, construction and commercial cleaning. This will include asking selected suppliers for basic information on recruitment practices, subcontracting, and supply chain visibility beyond tier one.

❖ Practical Contract and Supplier Management Improvements

The University will update relevant procurement templates and guidance so that higher-risk procurements include clear modern slavery expectations, escalation requirements and review points during contract management. This is intended to give suppliers clearer guidance on practical risk mitigation and improve consistency in how the University responds to identified risks.

❖ Student Awareness and Response Pathways

The University will work with relevant student-facing teams to prepare simple awareness material for students on workplace exploitation and modern slavery risks, especially for international students, placements and other vulnerable cohorts. We will also map existing referral pathways so student concerns can be directed quickly to the right support service.

❖ Better Screening for Research and Third-Party Relationships

The University will introduce a basic modern slavery prompt into relevant research contract and partnership intake processes so that higher-risk jurisdictions, sectors, delivery models or counterparties can be identified earlier. This is intended to improve data capture and support more consistent governance records.

❖ **Stronger Consultation with Controlled Entities and Central Oversight**

The University will use a short annual questionnaire for controlled entities to capture key information on workforce arrangements, procurement, third-party relationships, incidents and reporting pathways. This will help improve visibility over entity-level risks and identify where central guidance or support is needed.

❖ **University-Wide Risk Assessment and Action Tracking**

The University Risk Office will conduct a university-wide modern slavery risk assessment and maintain a simple action tracker for 2026 commitments. This will help prioritise the most severe risks, monitor progress, and prepare the University for stronger due diligence expectations under Australia's evolving anti-slavery framework.

Appendix A – Modern Slavery Act 2018 - Section 16 Index

Mandatory criterion	Where addressed in this Statement	Notes
s16(1)(a) Identify the reporting entity	About this statement; Section 1	The reporting entity is The Australian National University.
s16(1)(b) Describe structure, operations and supply chains	Section 1; 2025 snapshot	Includes governance, operational footprint, supply chain profile and controlled entities.
s16(1)(c) Describe risks of modern slavery practices	Sections 2 and 3	Risks are framed as salient risks across operations, supply chains and broader business relationships.
s16(1)(d) Describe actions to assess and address risks, including due diligence and remediation	Section 2	Includes procurement, student-facing activity, research contracts, gifts, investments, controlled entities and response pathways.
s16(1)(e) Describe how effectiveness is assessed	Section 4	Separates activity from effectiveness and identifies limitations.
s16(1)(f) Describe the process of consultation with owned or controlled entities	Sections 2 and 3	Section 3 records direct consultation and consideration of central governance materials relevant to ANU Enterprise Pty Ltd, ANU International Holdings, and the ANU (UK) Foundation.
s16(1)(g) Include any other relevant information	Section 5;	Includes teaching, research, sector collaboration, priorities and external reference points that informed the framing of the Statement.

Approval

This document is a Modern Slavery Statement for The Australian National University for the reporting period 1 January to 31 December 2025.

This report was approved by the ANU Council on 19 June 2026.

Reporting entity	The Australian National University
Reporting period	1 January - 31 December 2025
Approval by Council	19 June 2026
Responsible member	Dr Larry Marshall, Interim Chancellor



Dr Larry Marshall
Interim Chancellor
Australian National University
19 June 2026